

D-3 Archaeological and Paleontological Resources Assessment



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April 25, 2018

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Subject: Archaeological and Paleontological Resources Assessment for the Proposed 6220 West Yucca Street Project, City of Los Angeles, California.

Dear Mr. Beck:

This letter presents the results of an archaeological and paleontological resources assessment conducted by **Environmental Science Associates (ESA)** for the above-referenced project.

1.0 Project Description and Scope of Study

PCR (currently ESA) conducted an archaeological and paleontological resources assessment for the proposed 6220 West Yucca Street Project (the “Project”) to identify the potential impacts to archaeological and paleontological resources associated with the proposed Project for the purpose of complying with the California Environmental Quality Act (CEQA). The Project would include the redevelopment of an approximately 1.16-acre property (Project Site) with a mixed-use residential, hotel, and commercial/restaurant. The Project Site is currently improved with one single-family residence, one duplex with a detached garage and a studio apartment over the garage, and three, two-story apartment buildings with associated carports and paved surface parking areas, all of which would be demolished and removed to allow development of the Project. Building 1 of the Project (proposed at the southwest corner of Yucca Street and Argyle Avenue) would occupy the majority of the Project Site and would include a six-level podium parking structure with: two fully subterranean levels; two semi-subterranean levels; and two entirely above ground levels. Atop the highest above ground level (Level 3), Building 1 would include Levels 4 through 20. Building 1 would be 20 stories tall and would include a mix of commercial, hotel and residential uses. Building 2 (proposed at the southeast corner of Yucca Street and Vista Del Mar Avenue), would include three residential levels over a 2-story podium parking structure, which would include one subterranean parking level and one semi-subterranean parking level, which warrant excavation to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. Building 2 would consist of only residential uses.

The scope of work for this assessment included a cultural resources records search through the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the Native American Heritage Commission and a paleontological resources records search through the Natural History Museum of Los Angeles County (NHMLAC). In addition, ESA reviewed available Sanborn Maps, historic aerial imagery, and the *Historical Resources Assessment and Environmental Impact Analysis* report in order to understand the land use history at the Project Site. Since the Project Site is developed with buildings and paved areas (lacking exposed ground surface), a pedestrian survey for the Project Site was not conducted.



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2.0 Project Location

The Project Site is located in the Hollywood community of the City of Los Angeles, California and approximately 160 feet south of U.S. Highway 101 (**Figure 1, Regional and Vicinity Location Map**, attached). The Project Site is bounded by Yucca Street to the north; vacant land, single-family residences and duplexes to the south, North Vista Del Mar Avenue and single-family residences and duplexes to the east; and Argyle Avenue and commercial uses to the west (**Figure 2, Aerial Photograph**, attached). It is located in Section 7 of Township 1 South, Range 14 West of the Hollywood, CA United States Geological Survey 7.5' topographic quadrangle map (**Figure 3, Location Map**, attached).

3.0 Cultural Setting

3.1 Prehistoric Background

Archaeology is the recovery and study of material evidence of human life and culture. Over time, this material evidence becomes buried, fragmented or scattered, or otherwise hidden from view. In urban areas such as the Project Site and environs, archaeological resources may include both prehistoric remains (before 1769 A.D.) and remains dating to the region's historical period (1769 to 1950 A.D.). Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and burials. Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and burials and are generally associated in California with the Spanish Mission Period (after 1769) to the mid-20th century of the American Period. Archaeologists generally divide the human history of the southern California coast region into three major time intervals: Prehistoric, Protohistoric, and Historic (refer to **Table 1, Cultural Chronology of the Southern California Coast Region**, below). Prehistory is subdivided into the Paleocoastal, Milling Stone, Intermediate, and Late Prehistoric periods. History is subdivided into the Spanish, Mexican, and American periods.

**TABLE 1
 CULTURAL CHRONOLOGY OF THE SOUTHERN CALIFORNIA COAST REGION**

Date Range	Period
AD 1847-1960	American
AD 1822-1847	Mexican
A.D. 1769-1822	Spanish
A.D. 1542-1769	Protohistoric
1500 BP ^a to AD 1542	Late Prehistoric
4,000-1,500 BP	Intermediate



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7,000-4,000 BP	Milling Stone
More Than 7,000 BP	Paleocoastal

^a BP = Before Present. By convention, "present" is set at AD 1950

Source: Adapted from Elsasser (1978) and Schuyler (1978), and modified.

The cultural chronology of the region is a subject of ongoing investigation. The dating of cultural change continues to undergo refinement using the results of new excavations, as does our understanding of the processes of cultural change. The need for further research accounts for the use of some broad date ranges and the presentation of some key but untested hypotheses within the following discussion.

3.1.1 Prehistory, Early Holocene to AD 1542

The Project Site is located in the coastal zone of the northernmost Peninsular Ranges portion of the Southern California Coast prehistoric culture area, which encompasses the Transverse Ranges, the northern Peninsular Ranges, and the coastal zone and near-shore islands from Point Conception in the north to San Diego Bay in the south (Elsasser 1978). The subsistence of prehistoric hunter-gatherers in the coastal zone and near-shore islands depended on marine shellfish, fish, and mammals, supplemented with terrestrial game and a variety of terrestrial plants. Further inland, subsistence opportunities were limited to terrestrial plants and animals.

The prehistoric chronology of the region is traditionally divided into Milling Stone, Intermediate and Late Prehistoric periods, but more currently into Early, Middle, and Late Holocene periods (Altschul and Grenda 2002). In recent years, some conclusive evidence has emerged supporting human occupation during the late Pleistocene and earliest Holocene periods. The Pleistocene is the geological epoch which started from approximately 2,588,000 to 11, 700 years ago; while the Holocene epoch started approximately 11,650 years BP and continues today. Some of the oldest human skeletons found in the Americas were discovered at the Haverty Site, only about 9.3 miles south-southeast of the Project Site (Brooks et al. 1990). A more recent study of the Haverty skeletons concludes that at least some of the skeletons may be of "terminal Pleistocene age." (*Ibid*) Human bone collected from Santa Rosa Island in 1959 has recently been dated to 10,000-11,500 BP (Johnson et al. 2002) and is contemporaneous with pygmy mammoth bone also found on the island (Agenbroad et al. 2005). Human and domestic dog bone, collected in 1994 from La Brea Tar Pits about 7.5 miles south-southeast of the Project Site, has been dated to the beginning of the Holocene, but radiocarbon dating complications make the date uncertain (Erlandson 1994). The Milling Stone Horizon marks a shift from a subsistence strategy which emphasized big game hunting (of which large, fluted spear points, and the bones of butchered large mammals are hallmarks) to one which, for inland populations, emphasized plant seeds (as represented by the manos and metates used to mill them, and carbonized seeds) (Wallace 1955). This presumably adaptive change occurred perhaps as early as 7,000 years BP and no later than about 4,000 or 3,000 BP (Elsasser 1978).

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More elaborate material culture represents the subsequent Intermediate period, about 4,000 or 3,000 BP to about 1,500 BP: basket hopper mortars, bowl mortars, pestles, broad leaf-shaped blades, heavy side-notched and leaf-shaped spear points, stemmed atlatl dart points, implements and ornaments of bone, horn, shell, asphalt, and steatite, and inhumations with red ocher and stone cairns. This elaboration of material culture may reflect burgeoning and aggregating populations, and intensified social and political interaction.

The Late Prehistoric period, circa 1,500 BP, marks the advent of the bow and arrow as evidenced by finely chipped, stemless, concave- and convex-based arrow points, and steatite arrow straighteners. Also added to the material culture were steatite containers and shell, bone, and stone ornaments. Inhumations included abundant and diverse grave goods. The bow and arrow may have been adopted or developed primarily as a weapon rather than as a hunting tool, suggesting the full realization of population pressure and territoriality. Laboriously manufactured and visually attractive containers and ornaments, and mortuary customs requiring the sacrifice of considerably valuable material possessions, suggest a fully developed concept of wealth. Warfare, territoriality, and wealth all point to incipient tribalism.

3.1.2 Protohistory, AD 1542-1769

The Protohistoric period is the time between initial contact and subsequent, tenuous and peripheral contact with a literate culture to the full establishment of a local literate culture. In the Southern California Coast culture area, the advent of protohistory is marked by the maritime explorations of Juan Rodriguez Cabrillo in AD 1542. During the following 227 years, direct contact between local indigenous people and Europeans was limited to occasional European visits by sea. Spanish exploration and the establishment of Spanish colonies in Mexico, including along the Baja California Peninsula, afforded opportunities for brief episodes of direct contact and for peripheral contact such as “down-the-line” or “neighbor-to-neighbor” exchange of information and goods (Lightfoot and Simmons 1998).

European artifacts, although rare, are found in protohistoric archaeological deposits (King 1978). Glass trade beads are the most common. One example, albeit from farther north along the California coast, is that of China ceramic fragments from an AD 1595 Spanish shipwreck which were collected and reworked by the Coast Miwok for generations (Starr 2005). European diseases likely took a toll on indigenous populations during protohistory (Erlandson and Bartoy 1995). Historical documentation of local people and events began with the overland Portolá expedition in 1769 and the establishment of Spanish missions in the 1770s.

In 1542, when Cabrillo, leader of the first European exploration of the California coast, sailed his ships into the San Pedro and Santa Monica bays, a “great number of Indian villages” were observed (Walker 1951):

Villages were situated all along the Pacific shore wherever fresh water was available from flowing springs or cañon streams. In this semi-arid land established villages were almost inevitable wherever there was a stretch of level land along the banks of the Los Angeles River and the few other streams



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within the county area. In the mountains, the cañons usually were too narrow to afford sites for villages; but settlement sites are to be found where the cañons open out and the land levels off.

It is notable that the courses of the rivers of the Los Angeles Basin, prior to modern, artificial channelization, fluctuated horizontally as sediments built up, or were transported and shifted due to storm waters and, at their estuaries, tidal and wave forces. Prehistoric village site locations, hence, may correlate with former, pluvial river channels rather than with current channels. Prior to floods in 1824-1825, for example, the Los Angeles River emptied into Santa Monica Bay, not San Pedro Bay (Johnston 1962).

3.1.3 Ethnohistory, Early History, AD 1769-1847

The Project Site is located in the heart of Gabrielino¹ tribal territory which, at the start of the Spanish Period included the Los Angeles Basin and adjacent areas, and San Clemente, Santa Catalina, and San Nicolas islands. Their mainland territory extended from the San Fernando Valley and the San Gabriel Mountains in the north to Aliso Creek and the Santa Ana Mountains in the south, and from Mount Rubidoux in the east to Topanga Canyon in the west. This territory included mountain, foothill, prairie, coastal zones, and the islands, which offered a variety of resources to Gabrielino foragers.

There were possibly more than 100 mainland villages and Spanish reports suggest that village populations ranged from 50 to 200 people (Bean and Smith 1978). Prior to actual Spanish contact, the Gabrielino population had been decimated by diseases, probably spread by early Spanish maritime explorers (Tac 1930). A map of Gabrielino villages, based on documents from the Portola expedition in 1769 and other ethnographic records, indicates that the closest Gabrielino site to the Project Site is the village and sacred site of *Kawegna*, the source of the name for Cahuenga Boulevard. This site is located approximately three miles northwest of the Project Site in the general area of Toluca Lake and Universal City. The next closest village to the Project Site is the village of *Maungna*, once situated at the current location of Rancho Los Feliz, about 3.5 miles northeast of the Project Site.

The Gabrielino relied on gathered wild plants and trapped or hunted animals² for food. Acorns and piñon nuts were food staples found only in the mountains and foothills. On the islands and coast, marine resources, especially shellfish, fish, and sea mammals, greatly supplemented terrestrial resources. Plants also provided building material and raw material for craft manufacturing such as basket making. Animal bone, skin, fur, and feathers were also used as raw material for craft manufacturing. Whale bones were sometimes used in building windbreaks and houses. Certain types of stone were quarried and asphaltum³ was gathered for tool and container

¹ The Gabrielino (alternatively spelled Gabrieleño) are so called for their aggregation at the Mission San Gabriel Arcángel during the early Spanish Period. Currently, many Gabrielinos prefer the term Gabrielino-Tongva, or simply Tongva, or Kizh.

² Plants were not domesticated and domesticated animals were limited to dogs. Archaeological data collected to date does not suggest that dogs were used for food.

³ Asphaltum is a tar-like substance that washes ashore from natural, undersea oil seepages.

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manufacturing, and for water-proofing boats. Santa Catalina Island provided abundant steatite⁴ which was valued as a raw material for bowls and an array of other items, notably body ornaments.

The Gabrielino interaction sphere was considerably larger than their tribal territory *per se* (Bean and Smith 1978):

With the possible exception of the Chumash [their westward neighbors], the Gabrielino were the wealthiest, most populous, and most powerful ethnic nationality in aboriginal southern California, their influence spreading as far north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California.

The Gabrielino spoke several dialects of a Cupan language in the Takic family, and neighboring tribes to the north, east, and south also spoke languages in the Takic family (Shiple 1978).

Spain established two Franciscan missions in Gabrielino tribal territory: Mission San Gabriel Arcángel, founded in 1771 in the north-central Los Angeles Basin, and Mission San Fernando Rey de España, founded 1797 in the north-central San Fernando Valley. Prior to aggregation at the missions, the Gabrielino settlement pattern included primary villages and secondary camps; both villages and camps were situated alongside fresh waterways or springs.

For the Gabrielino and other Native Americans, Euro-American exploration and settlement, and the Spanish mission system, meant disease, strife, capture, displacement, and population decline from first contact until the 20th century (Castillo 1978).

During the Spanish and Mexican periods, from the time of the overland Portolá expedition until the culmination of the Mexican-American War, the Project Site was not far from the centers of population and commerce. El Pueblo de La Reina de Los Angeles, established in 1781, was about 5 miles to the southeast, and Mission San Gabriel was about 12 miles to the east (Beck and Haase 1974).

CA-LAN-159 (“La Brea Woman”)

In 1914, the remains of La Brea Woman (or CA-LAN-159) were discovered at the La Brea Tar Pits approximately two miles southwest of the Project Site approximately six to nine feet below the ground surface (Heizer 1949). Speculations have been made that La Brea Woman was between 25 to 30 years old at death, although her age has not been scientifically confirmed (Kennedy 1989). A number of resources included with the find consist of several bones of Pleistocene fauna, a mano, shell beads, and domestic dog remains from that time. The shell beads have been estimated to date an early Holocene age (i.e., 12,000 to 8,000 years before present).

Due to the relatively long history of urban development in the Project vicinity, the full extent and density of Gabrielino occupation of the Project area are unknown. However, the known presence of two villages nearby and

⁴ A soft rock consisting largely of talc and also known as steatite.



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CA-LAN-159, reveals that the region did have extended occupation by the Gabrielino and earlier prehistoric inhabitants.

3.2 Historic Background

In the beginning of the nineteenth century, Spaniards who had worked at the missions began to set up what would later be known as the Ranchos. During the Rancho era of California history, the state was divided into large parcels of land encompassing thousands of acres apiece and ruled over in a semi-feudal manner by men who had been deeded the land by the Spanish crown and, later, the Mexican government. In 1821 Mexico won independence from Spain and began to dismantle California's mission system. As the missions began to secularize, they were transformed into small towns and most Gabrielino were eventually marginalized on reservations or integrated into American society. Many American Californians married into the Rancho families, a development that would transform land ownership in Mexican California. By the time the United States annexed California after the Mexican-American War, many of the Rancho lands were already in the hands of Americans. Residential and commercial development of the immediate Project Site was underway by the late 19th century.

4.0 Methods

4.1 Cultural Resources Record Search

On July 2, 2015, ESA archaeologist, Fatima Clark, conducted a cultural resource records search at the CHRIS-SCCIC at the California State University, Fullerton. This records search included a review of all recorded built environment and archaeological resources within a half-mile radius of the Project Site as well as a review of cultural resource reports and historic topographic maps on file. In addition, ESA reviewed the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register of Historic Places (California Register), the National Register of Historic Places (National Register), and the California State Historic Resources Inventory listings (HRI). The purpose of the records search is to determine whether or not there are previously recorded archaeological or built environment resources within the Project Site that require evaluation. The results also provide a basis for assessing the sensitivity of the Project Site for additional and buried resources.

4.2 Sacred Lands File Search and Native American Consultation

On July 1, 2015, ESA archaeologist, Fatima Clark, commissioned a SLF search of the Project Site through the NAHC. The letter to the NAHC included information such as Project Site location and a brief description of the proposed development. Results of the search will provide information as to the nature and location of additional prehistoric or Native American resources to be incorporated in the impact analysis whose records may not be available at the CHRIS-SCCIC.



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Pursuant to NAHC suggested procedure, ESA sent follow-up letters via certified mail and via email on August 19, 2015 to the Native American individuals and organizations identified by the NAHC as being affiliated with the vicinity of the Project Site to request any additional information or concerns they may have about Native American cultural resources that may be affected by the Project.

4.3 Land Use History Research

ESA reviewed available Sanborn Maps from 1907, 1913 and 1950 acquired through Los Angeles Public Library; historic aerial imagery through NETR Online; and review of the *Historical Resources Assessment and Environmental Impact Analysis* (HRA) for the Project (Jerabek et al. 2017) to understand the land use history of the Project Site.

4.4 Paleontological Resources Record Search

ESA reviewed a previously commissioned paleontological resources records search (conducted through the NHMLAC) for the Palladium Residences Project which is located nearby. This records search entailed an examination of current geologic maps and known fossil localities within the general vicinity of the Project Site. The purpose of the records search is to determine whether or not there are previously recorded paleontological resources or fossiliferous geological formations within the Project Site that require evaluation. The results also provide a basis for assessing the sensitivity of the Project Site for additional and buried resources.

5.0 Results

5.1 Cultural Resources Record Search

Results of the cultural resources records search indicate that a total of 29 cultural resource studies have been conducted within a one-half mile radius of the Project Site. One of these studies, a Historic Resources Survey for the Hollywood Redevelopment Project has previously encompassed the Project Site. A total of 25 built environment resources have been recorded within a one-half mile radius of the Project Site. Of the 25 resources, two parcels within the Project Site with the addresses of 1765 and 1771 Vista del Mar Avenue are situated within the Vista del Mar/Carlos Historic District (19-176308). According to the Department of Parks and Recreation Form (Continuation Sheet) for 19-176308, the Vista del Mar-Carlos District was built between 1913 and 1922 (Heumann and McAvoy 1984). Another District resource (19-174178) known as the Hollywood Boulevard Commercial and Entertainment District is also located within close proximity and approximately 300 feet southwest of the Project Site (URS Corp. 2010). These resources and additional surveys are discussed further in the HRA for the Project (Jerabek et al. 2017). Apart from built historic resources, the SCCIC records search identified no known historic or prehistoric archaeological resources within a one-half mile radius of the Project Site.



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5.2 Sacred Lands File Search and Native American Consultation

Results of a SLF search through the NAHC did not indicate any known Native American cultural resources from the NAHC archives within the Project Site (Sanchez 2015). As previously mentioned and pursuant to NAHC suggested procedure, follow-up letters were sent via certified mail and via email on August 19, 2015 to the Native American individuals and organizations identified by the NAHC as being affiliated with the vicinity of the Project Site. On August 20, 2015, Mr. John Tommy Rosas from the Tongva Ancestral Territorial Tribal Nation replied via email. Mr. Rosas requested specific Project information including excavation depths/plans and lead agency contact information for further consultation regarding the Project. On September 8, 2015, PCR replied via email and provided Mr. Rosas with excavation depths and the lead agency contact. Mr. Rosas' response is provided in Appendix A of this report. In accordance with Assembly Bill (AB) 52, the City provided the required notice and conducted additional Native American consultations which are discussed further in the *Record Search Report and Tribal Consultation Summary for the Proposed 6220 West Yucca Street Project*, prepared by ESA, dated December 20, 2017. Pursuant to the City's AB 52 notification for the Project, representatives from the Fernandeano Tataviam Band of Mission Indians first requested, then withdrew their request, for consultation.

5.3 Land Use History Research

Review of the 1907 Sanborn Map indicates that the Project Site was previously developed with a dwelling and an outbuilding, a garage, and a hen house. Review of the 1913 Sanborn Map indicates that the dwelling and private garage still existed within the Project Site; however, the hen house appears to have been modified. According to a review of the HRA, the Project Site was owned by Albert G. Bartlett, the owner of Bartlett Sheet Music in downtown Los Angeles, who built a large home on the then seven-acre parcel, where he lived until his death in 1923. "Many considered the fifteen-thousand-square-foot Bartlett home one of the finest of the era. It had a reception room, a library and a music hall that seated an audience of two-hundred-and-fifty for Mr. Bartlett's opera-singing daughter" (Williams n.d.; Jerabek et al. 2017). Surrounding the extravagant home were gardens exhibiting Bartlett's interest in botany. In 1929, six years after Bartlett's passing, the area was re-subdivided as Tract 10149. The new layout included Argyle Avenue as it is seen today and divided the Bartlett property into four lots (Jerabek et al. 2017). According to historic aerial imagery review, the Bartlett residence was razed between 1923 and 1948 (NETR Online 2015). A 1950 Sanborn map shows the former Bartlett property occupied by the Country Church of Hollywood in lot 2 of the new subdivision. Between 1952 and 1954, the two apartment buildings that currently exist within the Project Site were constructed in the former location of the Bartlett residence (NETR Online 2015). The other two buildings that currently exist within the Project Site were constructed in 1918 (1765 N. Vista del Mar Avenue) and 1920 (1765 N. Vista del Mar Avenue) as single-family residences and have been improved over the years (Jerabek et al. 2017). These buildings are described further in the HRA for the Project.



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5.4 Paleontological Resources Record Search

Results of the previously conducted paleontological resources records search for the Palladium Residences Project (located one quarter-mile south of the Project Site) indicate that no vertebrate fossil localities from the NHMLAC archives have been recorded within the Project Site and surrounding vicinity. Surface deposits found at the Project Site consist of soil on top of terrestrial older Quaternary Alluvium derived from the Hollywood Hills and several fossil localities from these older Quaternary sediments have been documented in the general vicinity of the Project Site. The closest localities (LACM 6297-6300) from Late Pleistocene deposits are located approximately one half-mile east of the Project Site, along Hollywood Boulevard and between the Hollywood Freeway (US-101) and Western Avenue. LACM 6297-6300 yielded fossil specimens of a horse, bison, camel and mastodon at depths of 47 and 80 feet below the surface during work for the Metro Red Line tunnels and stations. Other fossil localities (LACM 5845, LACM 3250 and LACM 3371) have also been recorded approximately two to three miles south of the Project Site. LACM 5845 is located near the intersection of Western Avenue and Council Street and it produced a fossil specimen of a mastodon at depths of five to six feet below surface. LACM 3250 located at the intersection of Madison Avenue and Middlebury Street yielded a fossil specimen of a mammoth at a depth of eight feet below street level. LACM 3371 is situated near the intersection of Sierra Bonita Avenue and Oakwood Avenue, which yielded a fossil specimen of a bison at a depth of 12 feet below the surface (McLeod 2013). The paleontological resource records search results letter from the NHMLAC is provided in Appendix B of this report.

6.0 Summary of Results and Impact Analyses

6.1 Archaeological Resources

The results of the records search through the SCCIC indicated that no known historic archaeological or prehistoric archaeological resources have been recorded within the Project Site or within a half-mile radius of the Project Site. Review of the HRA indicated that the residence of Albert G. Bartlett, the owner of Bartlett Sheet Music in downtown Los Angeles, was formerly located within the Project Site and was considered one of the finest of the era. Review of historic aerial imagery revealed that the Bartlett residence was razed between 1923 and 1948. Between 1952 and 1954, the three apartment buildings that currently exist within the Project Site were constructed in former location of the Bartlett residence. Since the apartment buildings do not have basements, there is potential that historic archaeological resources associated with the Bartlett residence (e.g. refuse pits, privies, structural remains, etc.) have been preserved below the foundations of the apartments and below the surface parking lot within the Project Site. The other two buildings that currently exist within the Project Site were constructed in 1918 (1765 N. Vista del Mar Avenue) and 1920 (1765 N. Vista del Mar Avenue) as single-family residences and have been improved over the years. Since the Project Site has the potential to retain buried historic archaeological resources associated with the Bartlett residence that have at least some the potential of being historical or unique archaeological resources, the potential to encounter such subsurface archaeological resources during the construction of the Project is considered moderate. Therefore, Mitigation Measures ARCH-1 through ARCH-3 are



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prescribed below that would reduce potentially significant impacts to buried/unknown archaeological resources to a less than significant level.

6.2 Human Remains

The results of the record searches from the SCCIC and the NAHC indicated that no human remains have been recorded within the Project Site or within a one-half mile radius. Moreover, it is possible that the original construction of the former and existing uses at the Project Site has displaced human remains or other types of cultural resources. However, the negative results of the SCCIC and NAHC records search and the developed nature of the Project Site does not preclude the existence of buried human remains that may be encountered during construction. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code 5097.98, and Section 15064.5(e) of the California Code of Regulations. These regulations outline the procedures to follow in the event of a human remains discovery in any location. These procedures require the immediate halting of construction or ground-disturbing activities and notification of the County Coroner. If the remains are determined to be Native American in origin, a “Most Likely Descendent” would be contacted to assist in determining appropriate treatment for the remains. Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, compliance with applicable regulatory requirements would ensure impacts are less than significant.

6.3 Paleontological Resources

The paleontological records search results indicated that the Project Site may potentially contain fossiliferous older Quaternary alluvial fan and fluvial deposits that underlie surficial deposits. Numerous fossil specimens (horse, camel, mastodon, mammoth, and bison) from these deposits have been encountered relatively near the Project Site from depths between five to 12 feet below surface and 47 and 80 feet below the surface. The Project would include excavation to potential depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending down to approximately 40 feet below ground surface. As a result of these findings, Project grading and excavation in older Quaternary Alluvium deposits has high potential to encounter fossils. As a result, impacts on paleontological resources are considered potentially significant. Therefore, Mitigation Measures PALEO-1 to PALEO-3 have been prescribed to reduce this potentially significant impact to buried/unknown paleontological resources a less than significant level.

7.0 Recommended Mitigation Measures

The following mitigation measures are prescribed to reduce potentially significant impacts on buried/unknown archaeological resources and paleontological resources to a less than significant level pursuant to CEQA:



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7.1 Archaeological Resources and Human Remains:

- **MM-ARCH-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.
- **MM-ARCH-2:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.
- **MM-ARCH-3:** Prior to the release of the grading bond, the qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research,



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and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.

7.2 Paleontological Resources

- **MM-PALEO-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter the fossiliferous older Quaternary alluvium deposits (associated with sediments below five feet deep across the Project Site). The Paleontologist shall attend a pre-grade meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present during construction excavations into older Quaternary alluvium deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the qualified Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older Quaternary alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified Paleontologist.
- **MM-PALEO-2:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the qualified Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. If preservation in place is not a feasible treatment measure, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from the Project Site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Los Angeles County Natural History Museum, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.
- **MM-PALEO-3:** Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be



Mr. Greg Beck
April 25, 2018
Page 14

submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

Please contact us if you have any questions about the results and recommendations presented in this report.

Sincerely,

Fatima Clark
Archaeologist

Kyle Garcia
Senior Archaeologist I

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Mr. Greg Beck
April 25, 2018
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Mr. Greg Beck
April 25, 2018
Page 16

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Appendix A

NAHC Sacred Lands File Search Results Letter and Native American Consultation

NATIVE AMERICAN HERITAGE COMMISSION

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



August 6, 2015

Fatima Clark
PCR Services Corporation
2121 Alton Parkway, Suite 100
Irvine, CA 92606

Email to: f.clark@pcrnet.com

RE: Yucca Street Project: Hollywood Community, Los Angeles County.

Dear Ms. Clark,

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 373-3712.

Sincerely,

A handwritten signature in cursive script that reads "Katy Sanchez".

Katy Sanchez
Associate Government Program Analyst

**Native American Contact List
Los Angeles County
August 6, 2015**

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
(310) 570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
1999 Avenue of the Stars, Suite 1100 Gabrielino
Los Angeles , CA 90067
(310) 428-5690 Cell

Gabrielino/Tongva San Gabriel Band of Mission Indian
Anthony Morales, Chairperson
P.O. Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTtribalcouncil@aol.com
(626) 483-3564 Cell
(626) 286-1262 Fax

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
1999 Avenue of the Stars, Suite 1100 Gabrielino
Los Angeles , CA 90067
(626) 676-1184 Cell

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

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

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
(562) 761-6417 Voice/Fax

Gabrielino-Tongva Tribe
Conrad Acuna
1999 Avenue of the Stars, Suite 1100 Gabrielino
Los Angeles , CA 90067

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the 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 contacting local Native Americans with regard to cultural resources for the proposed Yucca Street Project: Hollywood Community, Los Angeles County.

**Native American Contact List
Los Angeles County
August 6, 2015**

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
(909) 262-9351

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the 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 contacting local Native Americans with regard to cultural resources for the proposed Yucca Street Project: Hollywood Community, Los Angeles County.

August 19, 2015



Andrew Salas, Chairperson
**GABRIELENO BAND OF MISSION
INDIANS – KIZH NATION**
P.O. BOX 393
Covina, CA 91723

**RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS
ANGELES COUNTY, CALIFORNIA**

Dear Mr. Salas:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

In order to ensure that any areas containing cultural resources or sacred lands are considered, PCR requests any information you are willing to share regarding Native American resources (including properties, places, or archaeological sites) in the vicinity of the project site that may be affected by the proposed project. The project site is located in Section 11 of Township 1 South, Range 14 West of the Hollywood, California United States Geologic Society 7.5’ topographic quadrangle map (see Figure 1).

Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 753-7001 or via email at f.clark@pcrnet.com

Sincerely,
PCR SERVICES CORPORATION

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Anthony Morales, Chairperson
**GABRIELENO/TONGVA SAN GABRIEL
BAND OF MISSION INDIANS**
P.O. BOX 693
San Gabriel, CA 91778

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Morales:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Sincerely,

PCR SERVICES CORPORATION

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Bernie Acuna, Co-Chairperson
GABRIELINO-TONGVA TRIBE
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Acuna:

PCR Services Corporation ("PCR") is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 753-7001 or via email at f.clark@pcrnet.com

Sincerely,
PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read "Fatima Clark".

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Conrad Acuna
GABRIELINO-TONGVA TRIBE
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Acuna:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

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Sincerely,
PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read "Fatima Clark", is positioned below the typed name.

Fatima Clark
Archaeologist

Attachment

August 19, 2015



John Tommy Rosas, Tribal Admin.
**TONGVA ANCESTRAL
TERRITORIAL TRIBAL NATION**
tattnlaw@gmail.com

**RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS
ANGELES COUNTY, CALIFORNIA**

Dear Mr. Rosas:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

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Sincerely,
PCR SERVICES CORPORATION

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Linda Candelaria, Co-Chairperson
GABRIELENO-TONGVA TRIBE
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Ms. Candelaria:

PCR Services Corporation ("PCR") is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 753-7001 or via email at f.clark@pcrnet.com

Sincerely,
PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read "Fatima Clark", is positioned above the typed name.

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Robert F. Dorame, Tribal Chair/Cultural Resources
**GABRIELINO TONGVA INDIANS
OF CALIFORNIA TRIBAL COUNCIL**
P.O. BOX 490
Bellflower, CA 90707

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Dorame:

PCR Services Corporation ("PCR") is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 753-7001 or via email at f.clark@pcrnet.com

Sincerely,

PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read "Fatima Clark", is positioned above the typed name.

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Sam Dunlap, Cultural Resources Director
GABRIELINO/TONGVA NATION
P.O. BOX 86908
Los Angeles, CA 90086

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Mr. Dunlap:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Sincerely,
PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read 'Fatima Clark', written over a white background.

Fatima Clark
Archaeologist

Attachment

August 19, 2015



Sandonne Goad, Chairperson
GABRIELINO/TONGVA NATION
106 ½ Judge John Aiso
Los Angeles, CA 90012

RE: PROPOSED 6220 YUCCA STREET PROJECT; HOLLYWOOD COMMUNITY, LOS ANGELES COUNTY, CALIFORNIA

Dear Ms. Goad:

PCR Services Corporation (“PCR”) is preparing environmental documentation for the proposed 6220 Yucca Street Project in the Hollywood community, Los Angeles County, California.

The project site is currently improved with two single-family residences and three, two-story apartment buildings and associated carports and paved surface parking areas. The proposed project would remove the existing on-site facilities to construct one, 32-story high-rise tower (Building 1) and one, 6-story building (Building 2) to include a mix of residential, hotel and commercial uses. The project would include between approximately 191 to 284 residential units, approximately 260 hotel rooms, and approximately 7,000 square feet of ground floor commercial space, with a Floor Area Ratio of 8:1. One level of subterranean parking and four-levels of above-ground podium parking would be provided for the project.

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Sincerely,
PCR SERVICES CORPORATION

A handwritten signature in black ink, appearing to read "Fatima Clark", is positioned below the typed name.

Fatima Clark
Archaeologist

Attachment

Fatima Clark

From: Fatima Clark
Sent: Tuesday, September 08, 2015 1:23 PM
To: 'Johntommy Rosas'
Cc: Kyle Garcia
Subject: RE: 6220 Yucca St. Project: Native American Consultation letter

Mr. Rosas

Please contact the lead agency directly regarding your comments/requests for tribal records search consultation.

Thank you.

Fatima

From: Johntommy Rosas [mailto:tattnlaw@gmail.com]
Sent: Tuesday, September 08, 2015 1:17 PM
To: Fatima Clark
Subject: Re: 6220 Yucca St. Project: Native American Consultation letter

you skipped this part ///

we charge \$50- per hour for those services your requesting -tribal records search
consultation will be same price ytbtd -
estimated time is 4 hours =\$200-invoice total- tribal records search
please confirm approval or refusal to compensate in violation of ACHP guidance documents including
discrimination laws-
thanks jt

On Tue, Sep 8, 2015 at 12:52 PM, Fatima Clark <F.Clark@pcrnet.com> wrote:

Dear Mr. Rosas

Thank you for providing your comments on the 6220 Yucca St. Project.

Excavation for the Project is anticipated to be approximately 60,000 CY. Maximum depth of excavation will be approximately 15 feet.

While alternatives to the project have yet to be defined, PCR assumes that alternatives with additional subterranean parking could be considered in the EIR. If so, it is estimated by PCR that any such alternatives would require an additional 12 feet of excavation for each subterranean level. Each additional level would require approximately 13,000 CY of excavation.

The site is currently entirely improved with urbanized uses (residential buildings and surface paved parking areas). There are no biological resources or water courses on the site. Thus, no federal or state biology related permits are needed.

Please contact the City planner for conceptual grading plans or/and any additional questions you may have regarding this project. All further communications should be with the City pursuant to AB 52. The contact information is provided below:

Lead Agency Contact:

William Lamborn

Major Projects

Department of City Planning

200 N. Spring Street, Rm 750

Ph: [213.978.1470](tel:213.978.1470)

e-mail: william.lamborn@lacity.org

Please let me know if you have any further questions or comments. Thank you!

-Fatima

From: Johntommy Rosas [mailto:tattnlaw@gmail.com]

Sent: Thursday, August 20, 2015 3:46 PM

To: Fatima Clark

Subject: Re: 6220 Yucca St. Project: Native American Consultation letter

thanks [expand email and show all text /attachments]

your letter doesnt express or contain any required sec 106 nhpa/ab52 /ajr 42 -undrip tribal consultation compliance language-please amend /correct -

we have significant land and water rights, preemptive/preexisting claims on that project ape and beyond including sacred sites that are documented-

your letter also excludes the total amounts of estimated excavations so please provide them- [in cubic yards is fine]

also please send the construction/excavation plans to us by email to me -

please provide lead agency contact or project manager so we can ask some direct questions that are confidential-

your letter doesnt disclose fed permits either or state permits-ie sec 404/408 and any rwqcb water board permits etc sec 401-

and if its a mitigation/remediation /or by order so please explain the projects permits applications

we have some older arch/reports of that area that we can let you folks use from our database under strict conditional use /license-

we charge \$50- per hour for those services your requesting -tribal records search

consultation will be same price ytbd -

estimated time is 4 hours =\$200-invoice total- tribal records search

please confirm approval or refusal to compensate in violation of ACHP guidance documents including discrimination laws-

thanks jt

On Thu, Aug 20, 2015 at 9:05 AM, Fatima Clark <F.Clark@pcrnet.com> wrote:

Dear Mr. Rosas

Attached is a Native American consultation letter & location map for the proposed 6220 Yucca St. Project in the City of Los Angeles. Thank you for your assistance.

-Fatima

Fatima Clark

Archaeologist



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2121 Alton Parkway, Suite 100 | Irvine, California 92606 | T: [949.753.7001](tel:949.753.7001) | www.pcrnet.com

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--

JOHN TOMMY ROSAS

TRIBAL ADMINISTRATOR

TRIBAL LITIGATOR

TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER UNDRIP

AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AJ52-AJR 42

25 U.S. Code § 1679 - Public Law 85-671

August 18, 1958 | [H. R. 2824] 72 Stat. 619

Tribal sovereignty in the United States is the inherent authority of indigenous tribes to govern themselves within and outside the borders and waters of the United States of America .

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Appendix B
**Paleontological Resources Record Search
Results**

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org



Vertebrate Paleontology Section
Telephone: (213) 763-3325
Fax: (213) 746-7431
e-mail: smcleod@nhm.org

27 August 2013

Planning Consultants Research
201 Santa Monica Boulevard, Suite 500
Santa Monica, CA 90401

Attn: Matthew Gonzalez, Associate Archaeologist / Paleontologist

re: Paleontological Records Search for the proposed Palladium Residences Project, in the City of
Los Angeles, Los Angeles County, project area

Dear Matt:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Palladium Residences Project, in the City of Los Angeles, Los Angeles County, project area as outlined on the portion of the Hollywood USGS topographic quadrangle map that you sent to me via e-mail on 15 August 2013. We do not have any fossil vertebrate localities that lie directly within the boundaries of the proposed project area, but we do have localities nearby that occur in the same sedimentary deposits that occur on the project property.

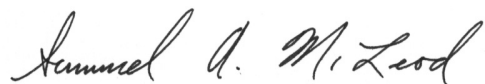
Surface deposits throughout the entire proposed project area consist of soil on top of terrestrial older Quaternary Alluvium, derived as alluvial fan deposits from the Hollywood Hills to the north. The uppermost layers of these deposits in the area typically do not contain significant fossil vertebrate remains. Just east-northeast east of the proposed project area east of the Hollywood Freeway (Highway 101), however, we have four vertebrate fossil localities, LACM 6297-6300, collected from these Late Pleistocene deposits at depths between 47 and 80 feet below the surface along Hollywood Boulevard between the Hollywood Freeway (Highway 101) and Western Avenue during excavations for the Metrorail Red Line tunnels and stations. Fossil horse, *Equus*, bison, *Bison*, camel, *Camelops*, and mastodon, *Mammuth americanum* specimens were recovered from these localities.

Further afield, especially to the south-southwest near the Rancho La Brea asphalt deposits in the Hancock Park region, fossil vertebrates have been recovered at shallower depths. Our closest vertebrate fossil locality in these older Quaternary sediments at shallow depth is LACM 5845, south-southeast of the proposed project area near the intersection of Western Avenue and Council Street, that produced a specimen of fossil mastodon, *Mammutidae*, at a depth of only 5-6 feet below the surface. To the southeast of the proposed project area, east-northeast of locality LACM 5845 at about the intersection of Madison Avenue and Middlebury Street, our vertebrate fossil locality LACM 3250, produced a fossil specimen of mammoth, *Mammuthus*, at a depth of about eight feet below street level. To the south-southwest of the proposed project area, near the intersection of Sierra Bonita Avenue and Oakwood Avenue, our vertebrate fossil locality LACM 3371 produced specimens of fossil bison, *Bison antiquus*, at a depth of 12 feet below the surface.

Surface grading or excavations at very shallow depth in the uppermost layers of soil and Quaternary deposits in the proposed project area are not likely to uncover significant vertebrate fossils. Deeper excavations, however, may well encounter significant remains of fossil vertebrates. Any substantial excavations in the proposed project area, therefore, should be monitored closely to quickly and professionally recover any vertebrate fossils without impeding development. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

A handwritten signature in cursive script that reads "Samuel A. McLeod".

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice