Appendix D
Archaeological Resources Assessment Report

ESA

CROSSINGS CAMPUS, CULVER CITY AND CITY OF LOS ANGELES, CALIFORNIA

Archaeological Resources Assessment Report

Prepared for
Culver Crossings Properties LLC
2221 Rosecrans Avenue, Suite 200
El Segundo, CA 90245

July 2022

ESA

CROSSINGS CAMPUS, CULVER CITY AND CITY OF LOS ANGELES, CALIFORNIA

Archaeological Resources Assessment Report

Prepared for:
Culver Crossings Properties LLC
2221 Rosecrans Avenue, Suite 200
El Segundo, CA 90245

July 2022

Project Director:
Monica Strauss, M.A., RPA

Project Manager:
Kyle Garcia, M.A., RPA

Report Author:
Fatima Clark, B.A.

Project Location:
Beverly Hills (CA) USGS 7.5-minute Topographic Quad
Township 2 South, Range 14 West, Unsectioned

Acreage: 4.46 acres

Assessor Parcel Numbers: 4312-015-005 and 4312-015-006

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
www.esassoc.com

ESA

Bend	Orlando	San Jose
Camarillo	Pasadena	Santa Monica
Delray Beach	Petaluma	Sarasota
Destin	Portland	Seattle
Irvine	Sacramento	Tampa
Los Angeles	San Diego	
Oakland	San Francisco	

D202100410.01

OUR COMMITMENT TO SUSTAINABILITY | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

TABLE OF CONTENTS

Crossings Campus – Archaeological Resources Assessment Report

Page

List of Figures

List of Tables

EXECUTIVE SUMMARY

Crossings Campus – Archaeological Resources Assessment Report

Culver Crossings Properties LLC, the Applicant, proposes to develop an office project (Project) on an approximately 4.46-acre site (Project Site) comprised of two properties: one 1.63-acre parcel is located in the City of Culver City (City), while the second 2.83-acre parcel is located in the City of Los Angeles. **Environmental Science Associates (ESA)** has prepared this archaeological resources assessment to identify and evaluate the potential impacts to archaeological resources associated with the Project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included conducting land use history research, 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 (NAHC), review of the geotechnical report for the Project, geologic map review, a pedestrian survey of the Project Site, a subsurface sensitivity assessment, and the recommendation of mitigation measures to reduce impacts from the Project to archaeological resources to a less than significant level. The City is the lead agency pursuant to CEQA.

The records search through the CHRIS-SCCIC revealed that no prehistoric archaeological resources have been previously recorded within the Project Site or 0.50-mile radius; however, one historic-period archaeological resource was previously recorded within 100 feet of the Project Site. This resource, CA-LAN-4829, consists of 13 features including the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s. Additionally, a recent construction project located 0.40 miles from Project Site yielded the identification of two prehistoric metate artifacts within the upper six feet of disturbed fill sediments. These resources were not evaluated as tribal cultural resources. Lastly, another construction project located 50 feet from the Project Site yielded the identification of three isolated historic-period artifacts consisting of glass bottle containers.

The records search through NAHC's SLF yielded negative results; however, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area. The City is conducting consultation with appropriate tribes per Assembly Bill (AB) 52 requirements and the results of this consultation will be summarized in the Draft Environmental Impact Report for the Project.

ESA did not identify any surface evidence of archaeological resources during the pedestrian survey of the Project Site; however, surface visibility was impeded due to the Project Site being largely developed with surface parking lots and buildings.

Geoarchaeological review was conducted to assess the subsurface sensitivity of the Project Site for both prehistoric archaeology and historic-period archaeology. Sediments within the Project Site are mapped as Quaternary alluvium, which have the potential to yield prehistoric archaeological resources because they date back to the late Pleistocene and Holocene (11,700 years ago to present)—the period for which there is widely accepted evidence for human occupation of southern California. The alluvial sediments were deposited on the ancient floodplain of the Los Angeles River and consist of well-sorted silts and sands, interbedded with stream channel deposits of sands and gravels (Dibblee and Ehrenspeck, 1991). The former Los Angeles River (now Ballona Creek) located approximately 0.50 miles east of the Project Site would have attracted prehistoric inhabitants to the area along with flora and fauna resources that would have been exploited by them. Moreover, alluvial deposition often results in the burial and preservation of prehistoric archaeological materials.

The sensitivity assessment identified historic land uses in the southern portion of the Project Site (Culver City Parcel) including a two-story structure originally called the Green Mill (and subsequently the Cotton Club House and Zuccas Opera House) which featured a round three-foot deep concrete pool, a restaurant and club for dining and dancing dating to the period between 1924 to at least 1949. This portion of the Project Site is currently developed with surface parking which is unlikely to have been subject to deep excavations that would have displaced or destroyed historic period resources. Additionally, as noted above, one historic-period archaeological resource (CA-LAN-4829) is known to be located approximately 100 feet southwest of the Project Site that was encountered during construction of a developed parcel. Lastly, another recent construction project within 50 feet of the Project Site yielded the identification of three isolated historic-period artifacts (consisting of whole glass bottle containers) within the upper five feet of disturbed fill sediments that exhibited a similar land use history as the Project Site. Only the southern portion of the Project Site (Culver City Parcel) has been documented to have prior improvements with a building originally known as Green Mill and later Cotton Club and Zuccas Opera. Based on these findings, the potential to encounter prehistoric archaeological resources is moderate across the Project Site while the potential for historic-period archaeological resources, especially in the southern portion of the Project Site (Culver City Parcel), is considered moderate to high. The northern portion of the Project Site is assigned a low sensitivity since no known previous uses existed in this area.

ESA recommends implementation of mitigation measures to reduce impacts to archaeological resources, which are provided in the *Summary of Results and Recommended Mitigation Measures* section of this report. With implementation of these measures, impacts to archaeological resources would be less than significant under CEQA.

CROSSINGS CAMPUS

Archaeological Resources Assessment Report

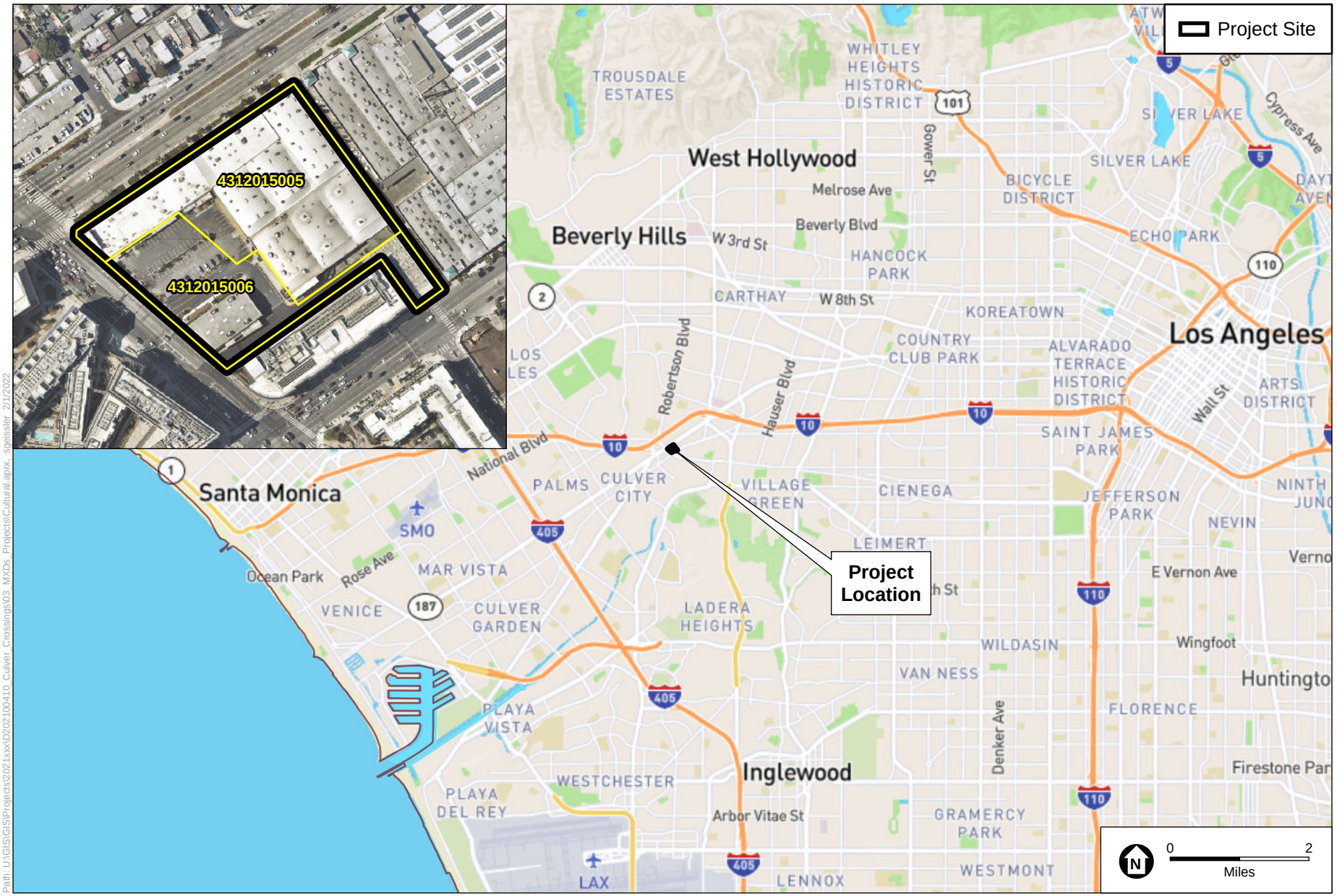
Introduction

Culver Crossings Properties LLC, the Applicant, proposes to develop an office project (Project) on an approximately 4.46-acre site (Project Site) comprised of two properties: one 1.63-acre parcel is located in the City of Culver City (City), while the second 2.83-acre parcel is located in the City of Los Angeles. ESA has prepared this archaeological resources assessment to identify and evaluate the potential impacts to archaeological resources associated with the proposed Project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included conducting land use history research, a cultural resources records search through the California Historical Resources Information Center-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the Native America Heritage Commission (NAHC), review of the geotechnical report for the Project, geologic map review, a pedestrian survey of the Project Site, a subsurface sensitivity assessment, and the recommendation of mitigation measures to reduce impacts from the Project to archaeological resources to a less than significant level. The City of Culver City (City) is the lead agency pursuant to CEQA.

ESA personnel involved in the preparation of this Report are as follows: Monica Strauss, M.A., RPA., project director; Kyle Garcia, M.A., RPA, Principal Investigator; Fatima Clark, B.A., report author and archaeological surveyor; and Stephan Geissler, GIS specialist. Resumes of key personnel are included in **Appendix A**.

Project Location

The Project Site is located at 8825 National Boulevard and 8871 Washington in Culver City, California (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California (Los Angeles Parcel) (**Figure 1**). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east (**Figure 2**). It is also situated within an unsectioned area of Township 2 South, Range 14 West on the Beverly Hills, CA U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (**Figure 3**).

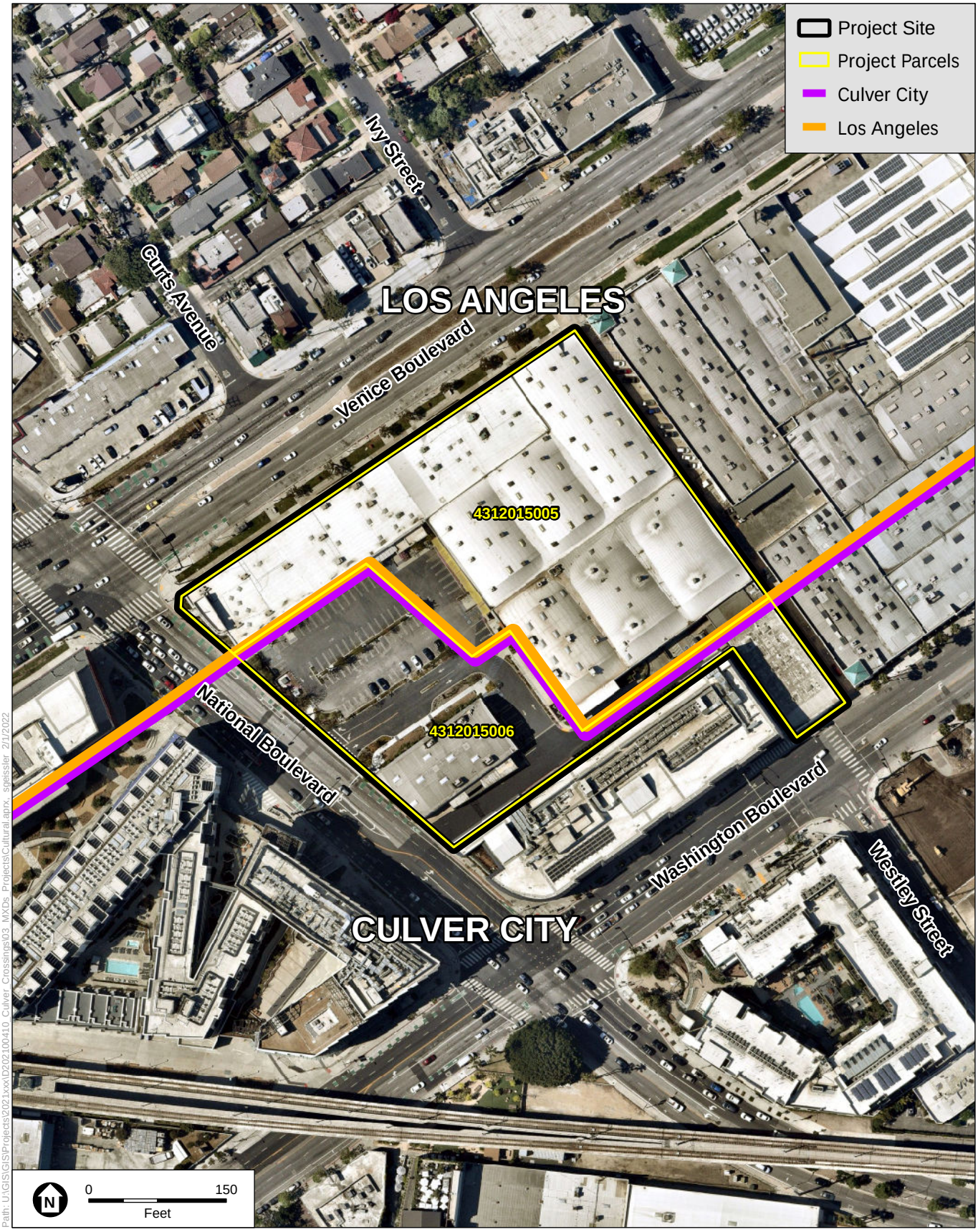


Path: U:\GIS\GIS\Projects\2021xxx\D202100410_Culver_Crossings\03_MXDs_Projects\Cultural.aprx, sgeissler 2/1/2022

SOURCE: Mapbox, 2021; ESA, 2022

Project Crossings

Figure 1
Project Location and Regional Vicinity



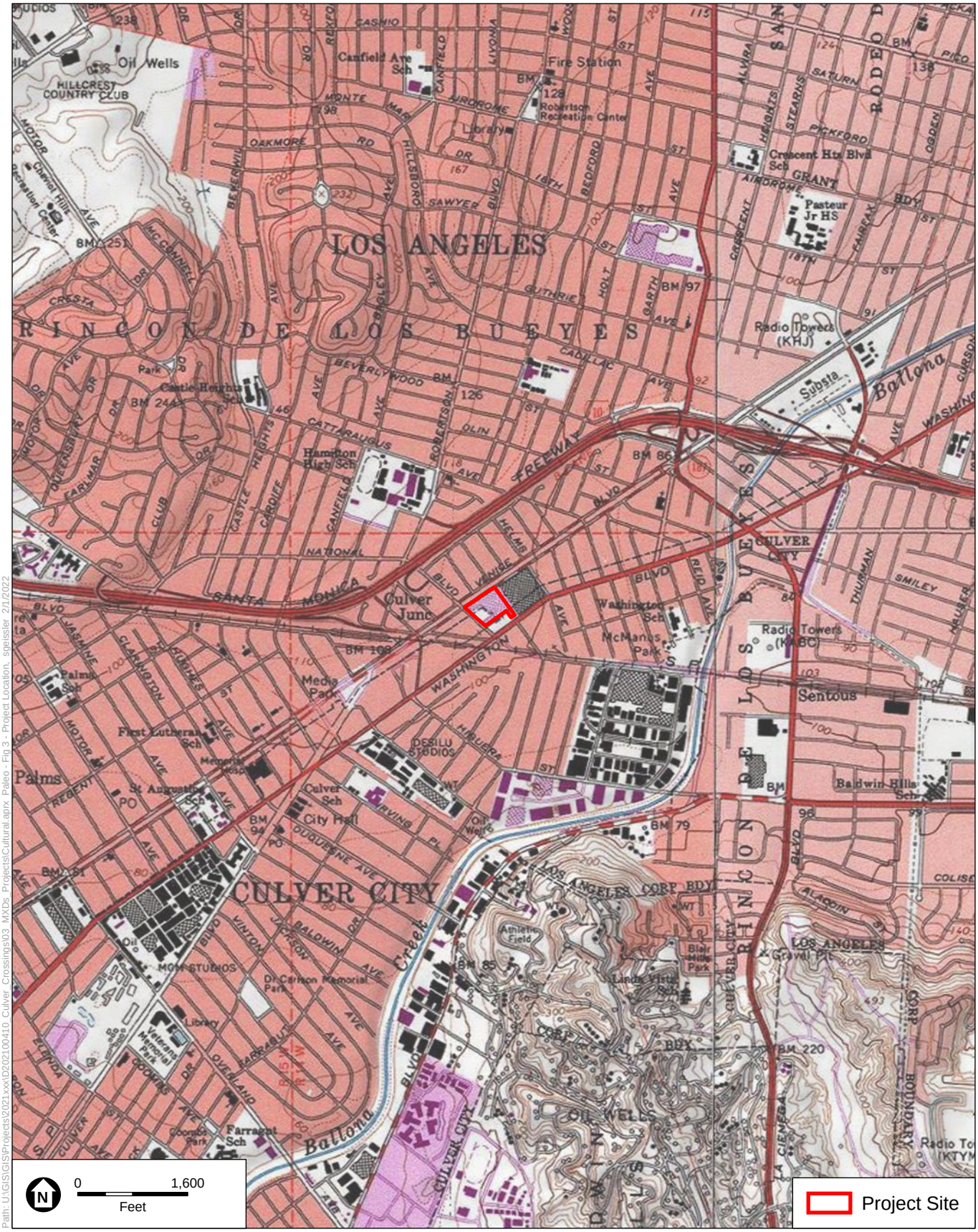
Path: U:\GIS\GIS\Projects\2021xxx\D2021004 10 Culver Crossings\03_MXDs_Projects\Cultural.aprx, speissler 2/1/2022

SOURCE: Nearmap, 2021

Project Crossings

Figure 2
Culver City and Los Angeles City Boundaries

ESA



Path: U:\GIS\GIS\Projects\2021xxx\D202100410 Culver Crossings\03 MXDs Projects\Cultural.aprx Paleo - Fig 3 - Project Location, sgeissler 2/1/2022

SOURCE: Beverly Hills Quad, 2013; ESA, 2022

Project Crossings

Figure 3
Project Location

ESA

Project Description

The Project Site is currently improved with low-rise warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. The Project Site is mostly flat with gradual sloping from north to south. Landscaping on the Project Site is limited to parking medians, street edge, and building perimeter planting.

The Culver City Parcel is currently developed with two warehouse buildings, surface parking and vehicular access that supports the existing uses on the Project Site. The one warehouse building is vacant while the other is used for storage. Vehicular access to the Culver City Parcel is provided along National Boulevard. Pedestrian access to the Culver City Parcel is provided along National Boulevard and on Washington Boulevard at the southern edge of the Project Site. The Los Angeles Parcel is currently improved with a single warehouse building that has been partitioned into six separate spaces consisting of a combination of office and retail uses, and 70 spaces of enclosed vehicular parking. Vehicular access to the Los Angeles Parcel is provided via the Culver City Parcel from National Boulevard. Pedestrian access is provided along the western edge on National Boulevard and via the northern edge of the site along Venice Boulevard.

The Project would involve demolition of the three existing buildings on the Project Site, totaling 105,047 square feet (sf), to support the proposed integrated office complex. The Project would construct two buildings, one on each of the two parcels that comprise the Project Site. The building to be constructed on the Culver City Parcel is identified as Building 1 consisting of a 167,000-sf office building. Building 1 would be four stories, measuring up to 56 feet in height to the top of the roof, with a three-level subterranean garage containing 478 vehicular parking spaces and 51 bicycle parking spaces. The maximum depth of ground disturbance for Building 1 is expected to reach depths of up to 50 feet below ground surface (bgs). The building to be constructed on the Los Angeles Parcel is identified as Building 2 consisting of a 369,000-sf office building. Building 2 would be four to five stories, measuring 56 feet to 71 feet in height to the top of the roof, with a three-level subterranean garage containing 738 vehicular parking spaces and 124 bicycle parking spaces. The maximum depth of ground disturbance for Building 2 is expected to reach depths of up to 50 feet bgs.

Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include the following:

- The California Environmental Quality Act
- The California Register of Historical Resources
- The California Health and Safety Code
- The California Public Resources Code

- Assembly Bill 52 and Related Public Resources Code Sections
- The City of Los Angeles General Plan
- City of Culver City General Plan

State

California Environmental Quality Act

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

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be

made to permit any or all of these resources to be preserved in place.[1] If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.[2]

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired".[3] According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant.[4]

California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[5] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register of Historic Places

1 California Public Resources Code Section 21083.1(a), http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21083.2. Accessed February 9, 2021.

2 State CEQA Statute and Guidelines, Section 15064.5(c)(4).

3 State CEQA Guidelines, Section 15064.5(b)(1).

4 State CEQA Guidelines, 15064.5(b)(3).

5 California Public Resources Code, Section 5024.1[a]. http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1. Accessed February 9, 2021.

(National Register) criteria.[6] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

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

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

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

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

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

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

6 California Public Resources Code, Section 5024.1[b] http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024.1. Accessed February 9, 2021.

California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code

PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by California State Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014. The act amended PRC Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

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

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

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

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

Local

City of Los Angeles General Plan

Conservation Element

The City of Los Angeles General Plan Conservation Element (Conservation Element), adopted in September 2001, includes policies for the protection of archaeological resources. As stated in Section 3, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City of Los Angeles' responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources

potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.[7]

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the Los Angeles City Council as a Historic Preservation Overlay Zone (HPOZ)

City of Culver City General Plan

The City of Culver City's General Plan does not include policies, goals, and objectives for archaeological resources; however, the City is currently preparing a General Plan update that will consider archaeological resources.

Cultural Setting

Prehistoric Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal[8] B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. (Byrd and Raab, 2007). During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab, 2007).

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson, 1994; Wallace 1955; Warren, 1968). The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson, 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab, 2007).

7 City of Los Angeles, Conservation Element of the General Plan, pages II-3 to II-5. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6- dfa967b2a1ee/Conservation_Element.pdf. Accessed February 9, 2021.

8 The word 'cal' is used to signify a calibrated date.

Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA) (Jones et al., 1999). While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected (McCawley, 1996). This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited (McCawley, 1996). Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources (McCawley, 1996).

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (*Pimu* or *Pimugna)* and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl (Byrd and Raab, 2007).

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Kroeber, 1925). Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith, 1978). The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber, 1925).

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino (Wallace, 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith, 1978).

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht, 2001). The closest named settlements to the Project Site are *Saa'anga* and *Waachnga.* Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley (1996) indicates that the settlement of *Saa'anga* was located approximately 2.15 miles southeast of the Project Site, while the settlement of *Waachnga* was situated approximately 4.35 miles south. Both of these settlements are depicted as located close to Ballona Creek.

Historic Setting

History and Early Development of Los Angeles

The Gabrielino were virtually ignored between the time of Cabrillo's visit and the Spanish Period, which began in 1769 when Gaspar de Portolá and a small Spanish contingent began their exploratory journey along the California coast from San Diego to Monterey. Passing through the Los Angeles area, they reached the San Gabriel Valley on August 2 and traveled west through a pass between two hills where they encountered the Los Angeles River and camped on its east bank near the present-day North Broadway Bridge and the entrance to Elysian Park (approximately 9 miles northeast of the Project Site). This location has been designated California Historic Landmark Number 655, the Portolá Trail Campsite. Father Crespi (a member of Portolá's party) indicated in his diaries that on that day they "entered a spacious valley, well grown with cottonwoods and alders, among which ran a beautiful river. This plain where the river runs is very extensive and…is the most suitable site for a large settlement" (The River Project 2001). He goes on to describe this "green, lush valley"; its "very full flowing, wide river"; the "riot of color" in the hills; and the abundance of native grapevines, wild roses, grizzly, antelope, quail and steelhead trout. Crespi observed that the soil was rich and "capable of supporting every kind of grain and fruit which may be planted." The river was named *El Rio y Valle de Nuestra Señora La Reina de Los Ángeles de la Porciúncula*.

Missions were established in the years that followed the Portolá expedition, the fourth being the Mission San Gabriel Arcángel founded in 1771 near the present-day City of Montebello, approximately 16.5 miles northeast of the Project Site. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system. The Gabrielino inhabiting Los Angeles County were under the jurisdiction of either Mission San Gabriel or Mission San Fernando. Due to the effects of colonization traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing (Jackson, 1999).

On September 4, 1781, which was 12 years after Crespi's initial visit, the *Pueblo de la Reina de los Ángeles* was established not far from the site where Portolá and his men camped. Watered by the river's ample flow and the area's rich soils, the original pueblo occupied 28 square miles and consisted of a central square, surrounded by 12 houses, and a series of 36 agricultural fields occupying 250 acres, plotted to the east between the town and the river (Gumprecht, 2001).

An irrigation system that would carry water from the river to the fields and the pueblo was the communities' first priority and was constructed almost immediately. The main irrigation ditch, or *Zanja Madre*, was completed by the end of October 1781. It was constructed in the area of present-day Elysian Park, and carried water south to the agricultural lands situated just east of the pueblo (Gumprecht, 2001).

By 1786, the flourishing pueblo attained self-sufficiency and funding by the Spanish government ceased. Fed by a steady supply of water and an expanding irrigation system, agriculture and ranching grew, and by the early 1800s the pueblo produced 47 cultigens. Among the most popular were grapes used for the production of wine. Vineyards blanketed the landscape between present-day San Pedro Street and the Los Angeles River. By 1830 an estimated 100,000 vines were being cultivated at 26 Los Angeles vineyards. Over 8,300 acres of land were being irrigated by the *zanjas* during the 1880s (Gumprecht, 2001).

Alta California became a state of Mexico when Mexico won its independence from Spain in 1821. Independence and the removal of economic restrictions attracted settlers to Los Angeles, and it slowly grew in size and expanded to the south and west. The population nearly doubled during this period, increasing from 650 to 1,250 between 1822 and 1845 (Weber 1982:226). Until 1832, Los Angeles was essentially a military post, with all able-bodied males listed on the muster rolls and required to perform guard duty and field duty whenever circumstances required (Los Angeles County 1963). The Mexican Congress elevated Los Angeles from pueblo to city status in 1835, declaring it the new state capital (Robinson, 1979:238–239).

The authority of the California missions gradually declined, culminating with their secularization in 1834. Although the Mexican government directed that each mission's lands, livestock, and equipment be divided among its converts, the majority of these holdings quickly fell into non-Indigenous hands. Mission buildings were abandoned and quickly fell into decay. Secularization further disenfranchised Native Americans who had become dependent on mission life. After secularization, "nearly all of the Gabrielinos went north while those of San Diego, San Luis, and San Juan overran this county, filling the Angeles and surrounding ranchos with more servants than were required" (Reid, 1977 [1851]:104).

The first party of U.S. immigrants arrived in Los Angeles in 1841, although surreptitious commerce had previously been conducted between Mexican California and residents of the United States and its territories. Included in this first wave of immigrants were William Workman and John Rowland, who soon became influential landowners. As the possibility of a takeover of California by the United States loomed large, the Mexican government increased the number of land grants in an effort to keep the land in the hands of upper-class *Californios* like the Domínguez, Lugo, and Sepúlveda families (Wilkman and Wilkman, 2006:14–17). Governor Pío

Pico and his predecessors made more than 600 rancho grants between 1833 and 1846, putting most of the state's lands into private ownership for the first time (Gumprecht, 2001). Having been established as a pueblo, property within Los Angeles could not be dispersed by the governor, and this task instead fell under the city council's jurisdiction (Robinson, 1979).

When Los Angeles was connected to the transcontinental railroad via San Francisco on September 5, 1876, it experienced a significant boost in population. The city would experience its greatest growth in the 1880s when two more direct rail connections to the East Coast were constructed. The Southern Pacific Railroad Company (Southern Pacific) completed its second transcontinental railway, the Sunset Route from Los Angeles to New Orleans, in 1883 (Orsi, 2005). In 1885, the Santa Fe Railroad completed a competing transcontinental railway to San Diego, with connecting service to Los Angeles (Mullaly and Petty, 2002). The resulting fare wars led to an unprecedented real estate boom, as well as affordable cross-country fares for immigrants. Despite a subsequent collapse of the real estate market, the population of Los Angeles increased 350 percent in the decade between 1880 and 1890 (Dinkelspiel, 2008).

The population boom of the 1880s drove the demand for real estate in Los Angeles. Farmland south and east of the City began to be replaced by residential and commercial development. Large tracts of agricultural land, now far more valuable for residential development, were subdivided and sold (Gumprecht, 2001).

A constant struggle to bring water to the residents of the pueblo necessitated the construction of Echo Park Reservoir, the Silverlake Reservoir, and the further expansion of the *zanja* irrigation ditches. When these measures proved insufficient, a more permanent solution to Los Angeles' water shortage was sought. Under the direction of City engineer William Mulholland, the Los Angeles Bureau of Water Works and Supply constructed the 238-mile-long Los Angeles Aqueduct. This 5-year project, completed in 1913, employed the labor of more than 5,000 workers and brought millions of gallons of water into the San Fernando (now Van Norman) Reservoir (Gumprecht, 2001). Now able to offer water and sewer service at a grand scale, many smaller cities were voluntarily incorporated by Los Angeles (Robinson, 1979:244).

From 1920 to 1930, Los Angeles experienced another population explosion, along with the rise of automobile transportation and the development of the entertainment industry. All told, between 1890 and 1930, the population of Los Angeles increased from 50,000 to 1.2 million people (Wild, 2005).

History and Early Development of Culver City

Harry H. Culver (1880 -1946), the founder of Culver City, was born in Milford, Nebraska on January 22, 1880. The middle child of five, Culver was raised on a farm along with three brothers and a sister. His father, Jacob Hazel Culver, was a brigadier general in the National Guard and a strict disciplinarian. Culver followed in his father's footsteps, enlisting in the military during the Spanish-American War. He studied at Doane College before spending three years at the University of Nebraska. In 1901, Culver traveled to the Philippines where he began working in the mercantile business, worked as a reporter for the Manila Times, and served as a special agent for the customs department. After more than three years in the Philippines, Culver

returned to the United States, performing his customs duties in Detroit and Saint Louis. He resigned from the customs department in 1910 when he moved to California and began working for real estate giant I.N. Van Nuys. “As the story goes, after Van Nuys offered to make him a manager because of his exemplary work, Culver decided to venture out on his own. After intense study, Harry Culver pinpointed the area between Los Angeles and Abbot Kinney’s resort of Venice for his city” (Cerra, 2013).

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

Culver City continued to grow and finally incorporated in 1917 (Cerra, 2013). The City grew outward from the downtown commercial area and adjacent film studios. This area saw commercial development along Culver Boulevard in the 1920s and 1930s, and spread to Washington Boulevard in the 1940s and 1950s, and was surrounded by residential neighborhoods. Downtown Culver City was centered on a main street (Washington Boulevard) anchored by a six-story hotel, Fire and Police Departments, a city hall, banks, restaurants, and stores. The early economics of Culver City were supported by movie studios. Industry came in the form of Western Stove in 1922, then the Helms Bakeries in 1930, and then the Hayden Industrial Tract was established in the 1940s. During the 1950s Washington Boulevard would be improved with a number of car dealerships. Over the years, more than forty annexations increased the size of the city from 1.2 square miles to about five square miles (Cerra, 2004).

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

Land Use History of the Project Site

Historic maps, Sanborn maps, and aerial photographs were examined to provide historical information about land uses of the Project Site and to contribute to an assessment of the Project Site’s archaeological sensitivity. Available topographic maps include the 1894 and 1900 Los Angeles; and the 1896, 1898 and 1920 Santa Monica 15-minute quadrangles. Sanborn maps for

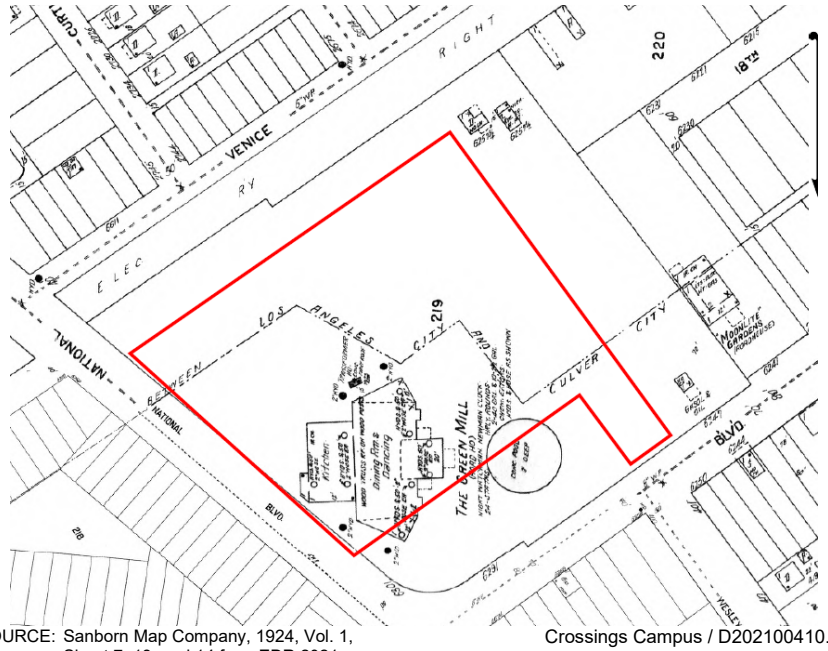
the following years were reviewed: 1924, 1929, 1949, and 1970. Aerial photographs from 1923, 1954, 1964, 1977, 1989, 2002, 2012, 2016, and 2021 (EDR, 2021).

The 1894, 1896, 1898, and 1900 historic maps show that the Project Site was undeveloped during these years and located within *Rancho Rincón de los Bueyes*. Ballona Creek and marshlands are depicted as located approximately 0.50 miles east of the Project Site, while the Southern Ivy Pacific Railroad is shown as located approximately 300 feet south of the Project Site. The 1920 historic map continues showing the Project Site as undeveloped; however, by this time, another track of the Pacific Electric is observed as following immediately adjacent to the western portion of the Project Site.

Review of the 1923 aerial photograph shows the Project Site as undeveloped while the Sanborn map from 1924 (**Figure 4**) shows that the southern portion of the Project Site (Culver City Parcel) was developed with a two-story structure called The Green Mill which featured a round three-foot deep concrete pool, a restaurant and club for dining and dancing. It is unknown as to whether this structure had a basement. The remainder of the Project Site was undeveloped. The 1929 Sanborn map (**Figure 5**) no longer depicts the pool and The Green Mill building which by then was now known as the Cotton Club Roadhouse. This building is known as the Zuccas Opera House in the 1949 Sanborn while the remainder of the Project is still undeveloped (**Figure 6**).

By 1954, the Project Site had changed dramatically. An aerial photograph from that year (**Figure 7**) shows that the opera house had been demolished and a configuration of large warehouse or industrial buildings similar to the Project Site's current configuration was present across the northern portion of the Project Site. Neither of these buildings appear to have a basement. A surface parking lot is located south of the buildings along National Boulevard and Washington Boulevard. The 1964 aerial photograph shows a new building in the southern portion of the Project Site, closest to Washington Boulevard. The 1970 Sanborn map (**Figure 8**) shows that the Project Site developed with the Dohrmann Hotel Supply Company, a retail store, manufacturing facilities for MFG Restaurant Equipment, and a garage and service building for a car lot located to the adjacent but not within the Project Site. The parking lot along the southern portion of the Project Site and fronting National Boulevard appears to be smaller than the parking lot depicted in the 1954 aerial photograph.

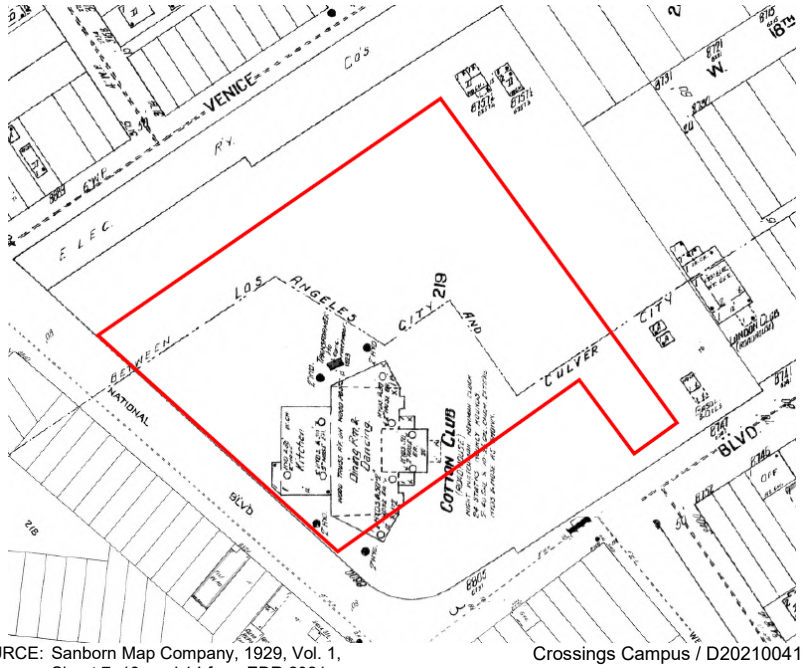
The aerial photographs from 1977, 1989, 2002, and 2012 show that the footprint of buildings within the Project Site remained unchanged. The aerial photograph from 2016 shows that one structure facing National Boulevard was removed within the Project Site to make room for parking. The 2021 aerial photograph shows that a small portion of a structure (that is located along National Boulevard) was demolished and the area was paved.



SOURCE: Sanborn Map Company, 1924, Vol. 1, Sheet 7, 18, and 14 from EDR 2021

Crossings Campus / D202100410.01

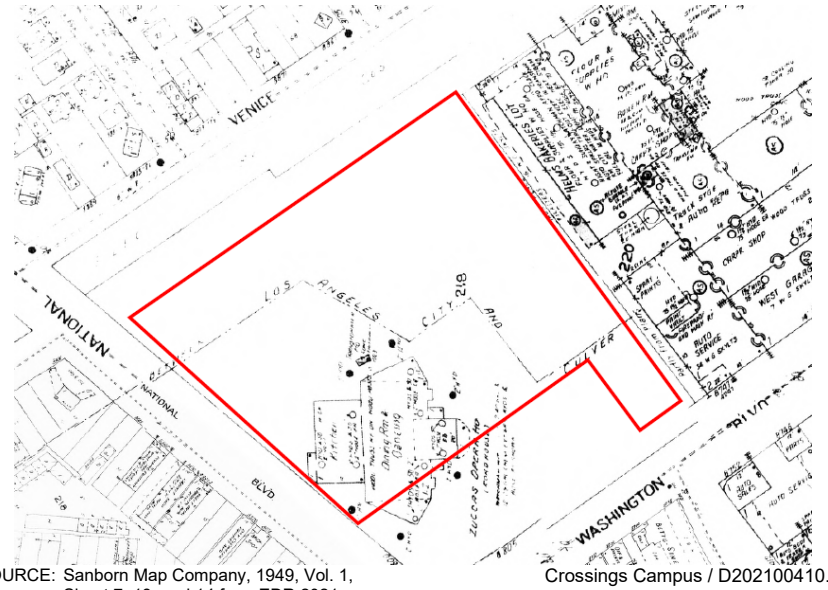
Figure 4
Excerpt of 1924 Sanborn map of the Project Site, outlined in red.



SOURCE: Sanborn Map Company, 1929, Vol. 1, Sheet 7, 18, and 14 from EDR 2021

Crossings Campus / D202100410.01

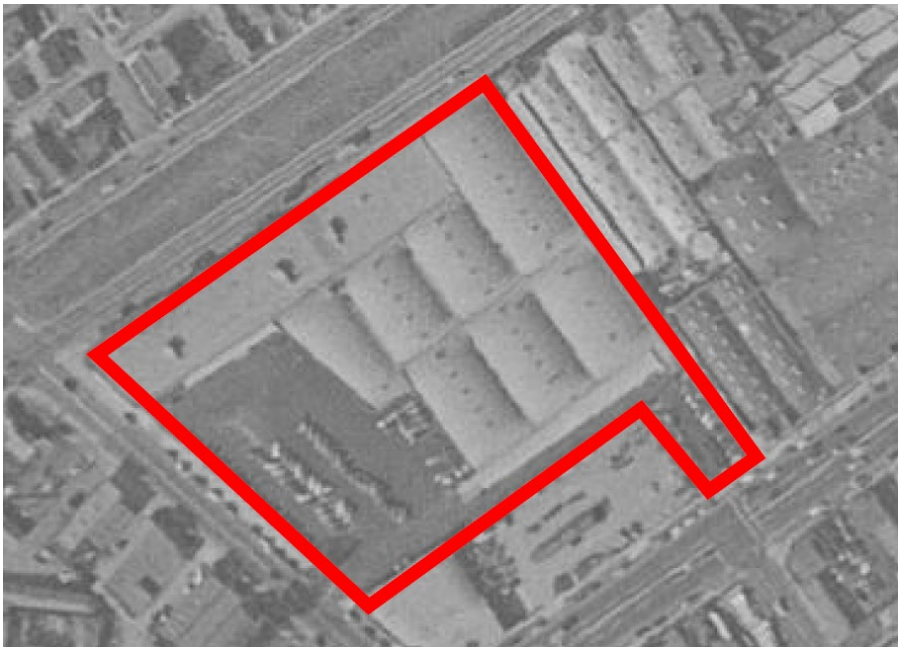
Figure 5
Excerpt of 1929 Sanborn map of the Project Site, outlined in red.



SOURCE: Sanborn Map Company, 1949, Vol. 1, Sheet 7, 18, and 14 from EDR 2021

Crossings Campus / D202100410.01

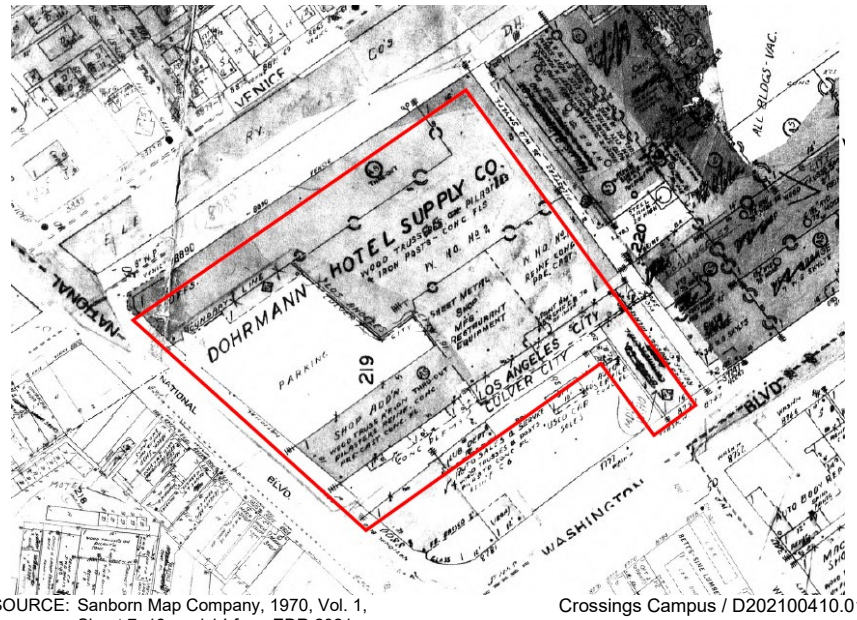
Figure 6
Excerpt of 1949 Sanborn map of the Project Site, outlined in red.



SOURCE: United States Department of Agriculture from EDR

Crossings Campus / D202100410.01

Figure 7
Excerpt of 1954 aerial photograph of the Project Site, outlined in red.



SOURCE: Sanborn Map Company, 1970, Vol. 1, Sheet 7, 18, and 14 from EDR 2021

Crossings Campus / D202100410.01

Figure 8
Excerpt of 1970 Sanborn map of the Project Site, outlined in red.

Archival Research

SCCIC Records Search

A records search for the Project Site was conducted on December 20, 2021, at the CHRIS-SCCIC housed at California State University, Fullerton. The records search included a review of all recorded cultural resources and previous studies within the Project Site and a 0.50-mile radius.

Previous Cultural Resources Investigations

The records search results indicate that eight cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 10 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments. Of the eight previous studies, none overlap the Project Site.

Previously Recorded Cultural Resources

The records search results indicate that a total of eight cultural resources have been recorded within the 0.50-mile radius. Of the eight resources, one is a multicomponent (including both historic architectural and historic archaeological components) resource (CA-LAN-3803); one is a historic-period archaeological resource (CA-LAN-4829); and six are historic architectural resources (P-19-162271, -175298, -177336, -177338, -186673, and -187052) (**Table 1**). None of these resources are located within the Project Site; however, one (CA-LAN-4829) is located within 100 feet of the Project Site. None of these resources have been evaluated as a tribal cultural resource and it is unlikely that they would qualify as they are not Native American or prehistoric in origin.

TABLE 1
PREVIOUSLY RECORDED CULTURAL RESOURCES

P-Number (P-19-)	Permanent Trinomial (CA-LAN-)	Other Designation	Description	Recording Events	Approx. Distance from Project Site
003803	3803	Santa Monica Air Line Segment; Los Angeles & Independence RR; Los Angeles Pacific RR; Pacific Electric; Southern Pacific RR	Multicomponent resource: 0.60-mile-segment of the Southern Pacific Railroad including historic architectural components (visible sections of track, standard gauge rail, electrical box, signs, bridges, etc), and historic-period archaeological components (buried sections of track)	2008	0.20 mi
004829	4829	Ivy Station Site	Historic-period archaeological site: resource consists of 13 features including the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s	2007	100 ft
162271	—	—	Historic architectural resource: Los Angeles Pacific Company Ivy Park Substation	1981; 2008	0.35 mi
175298	—	—	Historic architectural resource: Hamilton High School	1996	0.25 mi
177336	—	—	Historic architectural resource: Culver City Studios	1976	0.40 mi
177338	—	—	Historic architectural resource: Citizen Publishing Company Building (California Point of Historical Interest)	1986	0.45 mi
186673	—	—	Historic architectural resource: Pacific Bell Switching Building	2001	0.50 mi
187052	—	—	Historic architectural resource: Horizon School/Washington School/Echo School	1994	0.42 mi

SOURCE: SCCIC, 2021

Other Research

Additional archaeological resources (the report for which have not yet been archived at the CHRIS-SCCIC as it is still in progress) were identified approximately 0.40 miles from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City (ESA, 2022). These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. These resources were not evaluated as tribal cultural resources. Moreover, three isolated historic-period artifacts (glass bottle containers for soda and liquor) were recovered during construction of an adjacent development project (immediately to the south) in the upper five feet of disturbed fill sediments (ESA, 2021). None of these historic-period artifacts have been evaluated as a tribal cultural resource and it is unlikely that they would qualify as they are not Native American or prehistoric in origin. The report for this project has also yet to be submitted to the CHRIS-SCCIC. Both of these properties had a similar land use history as the Project Site.

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on October 18, 2021, to request a search of the SLF. The NAHC responded to the request in a letter dated November 29, 2021, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area (**Appendix B**). The City is conducting consultation with appropriate tribes per AB 52 and the results of this consultation will be summarized in the Tribal Cultural Resources Section of the EIR.

Geologic Map Review

Review of the geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles indicates that the Project Site is underlain by Quaternary alluvium deposits (Qa) and described as made up of alluvial "gravel, sand and silt-clay, derived mostly from Santa Monica Mountains; gravel and sand of stream channels" (Dibblee and Ehrenspeck, 1991).

Geotechnical Report Review

In order to understand the subsurface geological conditions at the Project Site, ESA reviewed the *Phase I Geotechnical Engineering Investigation* (Geotechnical Report) (Geotechnologies, Inc., 2021). Geotechnologies, Inc (2021) drilled two borings (B1 and B2) in August 2021 within portions of the Project Site (northern and southeastern) down to a depth of 80 feet below existing grade. Fill was found from the surface down to approximately 3 and 5 feet below existing grade, respectively. The fill was underlain by native alluvial soils consisting of sand, silt, and clay with varying composition (**Table 2**).

TABLE 2
GEOTECHNOLOGIES, INC. BORINGS (AUGUST 2021)

Boring No.	Type	Diameter	Depth	Location	Soil Observations
B1	Hollow stem	8 in	80 ft	Northern portion	0–5 ft: Fill 5–80 ft: Native soils (mixture of sands, silts, and clays with varying composition)
B2	Hollow stem	8 in	80 ft	Southeastern portion	0–9 in: Concrete 9in–3 ft: Fill 3–80 ft: Native soils (mixture of sands, silts, and clays with varying composition)

Geotechnologies, Inc (2021) indicates that in June of 2021 their firm also worked on two investigations within portions of the Project Site (southern, western and central), which pertained to the design of previous phases of the Project. Two borings and three test pits were excavated as part of these investigations. Borings were drilled to a depth of 90 feet below existing grade and test pits were excavated to depths between 10 and 20 feet below existing grade. In the borings, fill soils were observed between 3 and 11 ½ feet below existing grade. For the test pits, fill soils were observed between 3 ½ and 4 feet below grade (**Table 3**).

TABLE 3
GEOTECHNOLOGIES, INC. BORINGS/TEST PITS (JUNE/JULY 2021)

Boring No./ Test Pit	Type	Diameter	Depth	Location within Project Site	Soil Observations
B1	Hollow stem	8 in	90 ft	Western portion (along National Blvd)	0–1 ft: 5-inch asphalt over 7.5-inch base 1–3 ft: Fill 3–90 ft: Native soils (mixture of sands, silts, and clays with varying composition)
B2	Hollow stem	8 in	90 ft	Central portion (parking lot area)	0–5.5 in: Asphalt, no base 5.5 in–11.5 ft: Fill 11.5–90 ft: Native soils (mixture of sands, silts, and clays with varying composition)
TP1	N/A	N/A	20 ft	Central portion (inside buildings in area immediately east of parking lot)	0–4 in: Concrete slab 4 in–4 ft: Fill with brick and concrete fragments
TP2	N/A	N/A	10 ft	Central portion (inside buildings, north of TP1)	0–6 in: concrete slab 6 in–4 ft: Fill, construction debris fragments 4–10 ft: Native soils (mixture of sands, silts, and clays with varying composition)
TP3	N/A	N/A	17.5 ft	Southern portion (near a service entrance area)	0–4.5 in: Concrete slab 4.5 in–4 ft: Fill with minor construction debris 4–17.5 ft: Native soils (mixture of sands, silts, and clays with varying composition)

Geotechnologies, Inc. (2021) also mentions that a geotechnical exploration was conducted by Environmental Managers & Auditors, Inc. (2014) within portions of the Project Site (southern, central, eastern, and southwestern) where five exploratory borings were drilled to depths ranging between 5 and 51 ½ feet below existing site grade. In these borings, fill materials were observed from depths between 6 inches and 5 feet below grade. Fill materials were underlain by native alluvial soils (**Table 4**).

TABLE 4
MANAGERS & AUDITORS, INC. BORINGS (OCTOBER 2014)

Boring No.	Type	Diameter	Depth	Location within Project Site	Soil Observations
B1	Hollow stem	8 in	51.5 ft	Southern portion	0–6 in: Asphalt concrete 6 in–2 ft: Fill 2–51.5 ft: Native soils (mixture of sands, silts, and clays with varying composition)
B2	Hollow stem	8 in	51.5 ft	Central portion	0–6 in: Asphalt concrete 6 in–2 ft: Fill 2–51.5 ft: Native soils (mixture of sands, silts, and clays with varying composition)
B3	Hollow stem	8 in	5 ft	Southwestern portion	0–6 in: Asphalt concrete 6 in–2 ft: Fill 2–5 ft: alluvium (Silty clay).

Boring No.	Type	Diameter	Depth	Location within Project Site	Soil Observations
B4	Hollow stem	8	5	Eastern portion	0–8 in: concrete asphalt 8 in–5 ft: Fill
P1	Hollow stem	8	12.75 ft	Southern portion	0–6 in: Asphalt concrete 6 in–2 ft: Fill 2–9 ft: Silty clay 9–12.75 ft: Alluvium (Silty sand)

Pedestrian Survey

An archaeological survey of the Project Site was conducted on October 29, 2021, by ESA staff Fatima Clark, B.A. The survey was aimed at identifying surface evidence of archaeological resources within the Project Site.

Approximately 5 percent of the Project Site was subject to an opportunistic survey that targeted areas with exposed ground surface, such as landscaped areas. Ground surface visibility within the landscaped areas ranged from approximately 0–10 percent, due to grass, leaf litter, and mulch that covered the ground (**Figures 9–11**). The remaining 95 percent of the Project Site was not surveyed as it is currently developed with buildings and pavement. No archaeological resources or other indicators of archaeological materials, such as midden soils or shell, were observed within the areas surveyed.

SOURCE: ESA Crossings Campus / D202100410.01

Figure 9
Overview of landscaping along northwestern portion of Project Site (along Venice Boulevard), facing southwest.

SOURCE: ESA Crossings Campus / D202100410.01

Figure 10
Overview of landscaping along the southern portion of Project Site (along National Boulevard), facing southeast.

SOURCE: ESA Crossings Campus / D202100410.01

Figure 11
Overview of landscaped area in south central portion of Project Site, view south.

Subsurface Sensitivity Assessment

Prehistoric Archaeological Analysis

Review of the Geotechnical Report indicates that fill soils occur within the Project Site at varying depths from surface to 11.5 feet bgs with the majority ranging in depth between 0 and 4 feet, and that fill soils are underlain by "native soils". Review of geologic maps indicates these "native soils" consist of Quaternary alluvium which is a geologic unit dating to the time period between the late Pleistocene and Holocene (11,700 years ago to present) – the period for which there is widely accepted evidence for human occupation of southern California (Byrd and Raab, 2007). The alluvial sediments were deposited on the ancient floodplain of the Los Angeles River and consist of well-sorted silts and sands, interbedded with stream channel deposits of sands and gravels (Dibblee and Ehrenspeck, 1991). The former Los Angeles River (now Ballona Creek) would have attracted prehistoric inhabitants to the area along with flora and fauna resources that would have been exploited by them. Moreover, alluvial deposition often results in the burial and preservation of prehistoric archaeological materials. Although the Project Site is developed, construction of the warehouse buildings dating to the 1950s would not likely have involved particularly deep excavation and no basements are known to be associated with them. In cases where later development does disturb native sediments, archaeological materials can become intermixed within historic fill such as in the case with the two prehistoric metates encountered during monitoring (in the upper six feet of disturbed fill sediments) in connection with a development project in Downtown Culver City located approximately 0.40 miles from the Project Site in a similar geologic setting and underneath similar mid-century warehouse buildings. Additionally, during AB 52 consultation for the Project, the Gabrieleño Band of Mission Indians—Kizh Nation indicated that the Project Site was once located in the vicinity of many prehistoric trade routes. This statement was confirmed by reviewing the Kirkman-Harriman Pictorial and Historical Map of Los Angeles County (1938) provided by the tribe, which shows that the Project Site was once located in the vicinity of old/ancient roads which could have been possibly used as prehistoric trade routes. Moreover, the Native American villages of *Saa'anga* and *Waachnga* were formerly located approximately 2.15 miles southeast and 4.35 miles south of the Project Site in the immediate vicinity of Ballona Creek (McCawley 1996), which demonstrates that prehistoric occupation has occurred in this region in an environmental setting similar to that of the Project Site's. For these reasons, there is at least a *moderate* potential for prehistoric archaeological materials to be encountered as a result of Project-related ground-disturbing activities.

Historical Archaeological Analysis

Development of the Project Site began in the 1920s with all of the development from this time period occurring in the southern portion of the Project Site (Culver City Parcel). The development included a two-story structure originally called the Green Mill (and subsequently the Cotton Club House and Zuccas Opera House) which featured a round three-foot deep concrete pool, a restaurant and club for dining and dancing. During the 1950s the Project Site was redeveloped for industrial uses, including a warehouse and manufacturing building with offices for the Dohrmann Hotel Supply Company (none of which appears to contain basements), and a surface parking lot located to the south of the buildings along National Boulevard and Washington Boulevard. Currently, the southern portion of the Project Site (along National Boulevard) is developed with a

surface parking lot. Parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for parking lots are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the asphalt pavement could have served as a barrier that could have prevented further impacts to any such resources. Additionally, one historic-period archaeological resource (CA-LAN-4829) is located approximately 100 feet southwest of the Project Site and was discovered during construction of a development project (ESA, 2018). This resource consists of 13 features including the remnants of two wells/cisterns, structural remnants, two metal tanks, and eight refuse deposits dating from the 1880s to the 1920s. None of these resources have been evaluated as a tribal cultural resource and it is unlikely that they would qualify as they are not Native American or prehistoric in origin. Lastly, construction activities for another adjacent project within 50 of the Project Site yielded the identification of three isolated historic-period artifacts (consisting of whole glass bottle containers) within the upper five feet of disturbed fill sediments at a property that had a similar land use history as the Project Site. Given the identification of historic-period archaeological resources in the vicinity and the potential for past and current land uses to have capped and sealed archaeological resources, the potential to encounter historic-period archaeological resources, especially in the southern portion of the Project Site, is considered moderate to high.

Summary of Results and Recommended Mitigation Measures

The archaeological sensitivity assessment has indicated that the potential for encountering prehistoric archaeological resources is moderate across the Project Site while the potential for historic-period archaeological resources, especially in the southern portion of the Project Site, is considered moderate to high. The northern portion of the Project Site is assigned a low sensitivity since no known previous uses existed in this area. Therefore, impacts to previously unknown buried archaeological resources would be potentially significant, and the following mitigation measures are provided in order to reduce impacts to archaeological resources to a less-than-significant level under CEQA.

- Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.

  Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological

resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

- In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

  All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find 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 of Culver City (City) to develop a reasonable and feasible 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. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

  If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that 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; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

- The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

References

Bean, Lowell J., and Charles R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Brooks, Sheilagh, Richard H. Brooks, G.E. Kennedy, J. Austin, James R. Firby, Louis A. Payen, Peter J. Slota, Jr., Christine A. Prior, and R.E. Taylor. 1990. The Haverty Human Skeletons: Morphological, Depositional, and Geochronological Characteristics, *Journal of Great Basin Anthropology* 12(1): 60-83.

Byrd, Brian F., and Mark L. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp 215-227.

Cerra, Julie Lugo. 2004. *Images of America: Culver City*, Arcadia Publishing, Charleston.

Cerra, Julie Lugo. 2013. *Culver City Chronicles.* Charleston, History Press.

Dibblee, T.W., and H.E. Ehrenspeck. 1991. Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1: 24,000. Accessed at https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15, on December 13, 2021.

Dinkelspiel, Frances. 2008. Towers of Gold, St. Martin's Press, New York.

Douglass, John G., Seetha N. Reddy, Richard Ciolek-Torello, and Donn R. Grenda, 2016, editors, *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California*, Statistical Research, Inc., Technical Series 94, Tucson, Arizona and Redlands, California.

Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York.

ESA. 2018. Archaeological and Paleontological Monitoring Results for the Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles, California. Report on file with the CHRIS-SCCIC, Fullerton, CA.

ESA. 2021. Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

ESA. 2022. (*in progress*) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

Geotechnologies, Inc. 2021. *Geotechnical Engineering Investigation*, Proposed Commercial Office Development, 8876 through 8888 West Venice Boulevard, and 8829 West National Boulevard, Los Angeles, California.

Grimmer, E. Anne. 2017. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings. Washington, D.C.: U.S. Department of the Interior National Park Services: Technical Preservation Services.

Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth,* The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

Homburg, Jeffrey A., Douglass, John G., and Seetha N. Reddy, editors. 2014. *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California*, Volume 1. Statistical Research, Inc., Technical Series 94, Tucson, Arizona and Redlands, California.

Jackson, Robert H., Agriculture. 1999. Drought & Chumash Congregation in the California Missions (1782-1834), Articles, California Mission Studies Association Newsletter, 1999.

Johnson, J. R., and D. D. Earle. 1990. Tataviam Geography and Ethnohistory. *Journal of California and Great Basin Anthropology*, Vol. 12, No. 2, pp. 191-214.

Kirkman, George W. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County; 1860 A.D. -1937 A.D. Copyright 1938.

Koerper, H.C., R.D. Mason, and M.L. Peterson. 2002. Complexity, Demography, and Change in Late Holocene Orange County. In *Catalysts to Complexity: Late Holocene Societies of the California Coast*, edited by J.M. Erlandson and T.L. Jones, pp. 63-81. Perspectives in California Archaeology Volume 6. University of California, Los Angeles.

Kroeber, A. L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78. Smithsonian Institution, Washington, D.C.

McCawley, William.1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California.

McWilliams, Carey. 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.

Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz. 2009. *Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

Mullaly, Larry and Bruce Petty. 2002. *The Southern Pacific in Los Angeles, 1873-1996*, Golden West Books and the Los Angeles Railroad Heritage Foundation, San Marino, California.

Orsi, Richard J. 2005. Sunset Limited: *The Southern Pacific Railroad and the Development of the American West, 1850–1930*, University of California Press, Berkeley and Los Angeles.

Pitt, Leonard. 1994. *The Decline of the Californios. A Social History of the Spanish-Speaking Californians, 1846–1890*. University of California Press. Berkeley, Los Angeles, London.

Pollard, A. Mark, and Carl Heron. 2008. *Archaeological Chemistry*, The Royal Society of Chemistry, Cambridge, United Kingdom.

Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3–27.

Starr, Kevin. 2007. *California: A History*. Modern Library, New York.

Wallace, William J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214-230.

Warren, Claude N. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast. In Archaic Prehistory in the Western United States, C. Irwin-Williams, ed, pp. 1-4. *Eastern New Mexico University* Contributions *in Anthropology*. Portales.

Yerkes, R. F., T. H. McCulloh, J. E. Schoellhamer, and J. G. Vedder. 1965. *Geology of the Los Angeles Basin – An Introduction.* U.S. Geological Survey Professional paper 420-A. 64 pp.

Appendix A
Personnel

Monica Strauss, RPA

Director, Southern California Cultural Resources Group

EDUCATION

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

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

AA, Humanities, Los Angeles Pierce College

19 YEARS EXPERIENCE

SPECIALIZED EXPERIENCE

Treatment of Historic and Prehistoric Human Remains

Archaeological Monitoring

Complex Shell Midden Sites

Groundstone Analysis

PROFESSIONAL AFFILIATIONS

Register of Professional Archaeologists (RPA), #12805

Society for California Archaeology (SCA)

Society for American Archaeology (SAA)

QUALIFICATIONS

Exceeds Secretary of Interior Standards

CA State BLM Permitted

Monica has successfully completed dozens of cultural resources projects throughout California and the greater southwest, where she assists clients in navigating cultural resources compliance issues in the context of CEQA, NEPA, and Section 106. Monica has extensive experience with archaeological resources, historic buildings and infrastructure, landscapes, and Tribal resources, including Traditional Cultural Properties. Monica manages a staff of cultural resources specialists throughout the region who conduct Phase 1 archaeological/ paleontological and historic architectural surveys, construction monitoring, Native American consultation, archaeological testing and treatment, historic resource significance evaluations, and large-scale data recovery programs. She maintains excellent relationships with agency staff and Tribal representatives. Additionally, Monica manages a general compliance monitoring team who support clients and agencies in ensuring the daily in-field compliance of overall project mitigation measures.

Relevant Experience

County of Los Angeles, Department of Public Works, Rancho Los Amigos South Campus EIR, Downey. CA. *Project Manager.* The County of Los Angeles (County) proposes redevelopment of a portion of the Rancho Los Amigos (RLA) South Campus which is located in the City of Downey. The 74-acre RLA South Campus was the home of the "Los Angeles County Poor Farm" that was established in 1880s to provide room and board to indigent citizens in exchange for agricultural labor, then served as an infirmary and later evolved into a hospital facility in 1932. The RLA South Campus functioned as a major hospital complex from 1956 to the 1990s, when it was abandoned. The RLA South Campus is currently unoccupied and has been designated as the RLA Historic District in the National Register of Historic Places. The County is proposing redevelopment of a 21-acre portion of the RLA South Campus with County uses, including a Sheriff's Station Crime Laboratory, Internal Services Department Headquarters, and Probation Department Headquarters. The project will include supporting parking and installation of utilities and other features on a site that has been abandoned for nearly 30 years. Building demolition and/or repurposing or relocation of existing buildings will be required. ESA is leading the CEQA process on behalf of the County, including preparation of all technical studies in support of a full-scope EIR for the RLA South Campus Project. This includes a Historic District Evaluation, archaeological surveys, traffic, water supply, arborist services, and all other CEQA-required topics. ESA is also serving in an Executive Consultant role to the County, to advise on other potential future projects at the RLA Campus.

County of Los Angeles, Department of Public Works, Arroyo Seco Bike Path Phase I Cultural Resources Evaluation, Los Angeles, CA. *Project Director.* Working for the County of Los Angeles, Department of Public Works in connection with a project to make improvements to the Arroyo Seco Channel, Monica

managed all aspects of Section 106 review in accordance with Caltrans Cultural Resources Environmental guidelines. Monica and her team evaluated the Arroyo Seco Channel, identified character-defining features, informed the design of channel improvements to retain such features, and addressed the channels' potential for eligibility as part of a larger Los Angeles Country water management district. She developed the research strategy, directed the field teams, and prepared cultural resources assessment documentation for approval by Caltrans and FHWA, as well as the cultural resources section for a Mitigated Negative Declaration.

Los Angeles Department of Water and Power La Kretz Innovation Campus, Los Angeles County, CA. *Project Director.* The project involved the rehabilitation of the 61,000-square-foot building located at 518-524 Colyton Street, demolition of the building located at 537-551 Hewitt Street, and construction of an open space public plaza and surface parking lot, and involved compliance with Section 106 of the National Historic Preservation Act and consultation with the California State Historic Preservation Officer. ESA is providing archaeological monitoring and data recovery services and is assisting LADWP with meeting their requirements for Section 106 of the National Historic Preservation Act. Monica is providing oversight to archaeological monitors and crew conducting resource data recovery and laboratory analysis, and is providing guidance to LADWP on meeting Section 106 requirements.

Los Angeles Unified School District (LAUSD) Florence Nightingale Middle School Historic Architectural Review, Los Angeles County, CA. *Cultural Resources Project Director.* Monica managed the historical analysis of the LAUSD Florence Nightingale Middle School. The analysis included a cultural resources survey that photo-documented buildings that would be affected by the project. The project includes HVAC replacement to a 1967 Classroom Buildings, kitchen upgrades within the 1937 Domestic Science/Cafeteria Building, and improvements to the 1965 chiller yard. Florence Nightingale Middle School was previously recommended eligible for listing in the California Register.

Viewpoint School, Tennis Courts and Park, Calabasas, CA. *Cultural Resources Project Director.* ESA is working with the City of Calabasas to prepare an IS/MND to support the development of the proposed Viewpoint School Tennis Courts and Parking Lots project, which includes the development of three sites (Peters, Brown, and Castle Oak) that would become part of the school campus property. Improvements entail installation of six tennis courts (including an accessory building), additional campus parking in three areas, and the renovation of two existing residential structures, one to accommodate offices for school administration and the second to provide a primary residence to the school principal. The project would remove the Peter's property building and appurtenant structures, redevelop the interior of the Castle Oaks property to accommodate the administrative offices, and update the Brown residence to accommodate the principal's primary residence. ESA is preparing three technical studies to support the IS/MND, including air quality, cultural resources, greenhouse gas emissions, and noise. ESA peer reviewed the biological resource reports and traffic study that were prepared to support the document. Monica provided technical and compliance oversight to the cultural resources staff.

Kyle Garcia, M.A., RPA

Principal Archaeologist

EDUCATION

M.A., Anthropology (Archaeology Option), California State University Los Angeles,

B.A., Anthropology, (Physical/ Biological Emphasis), University of California, Santa Barbara

18 YEARS EXPERIENCE

CERTIFICATIONS/ REGISTRATION

Register of Professional Archaeologists

Riverside County Registered Archaeologist and Paleontologist

Orange County-Certified Archaeologist and Paleontologist

40-Hour HAZWOPER Training – Update, 2019

PROFESSIONAL AFFILIATIONS

Society for American Archaeology

Society for California Archaeology

Pacific Coast Archaeological Society

Kyle Garcia has 18 years of experience in the archaeology and prehistory of southern California, with a specialization in faunal analysis. During his career, he has authored or contributed to more than 800 projects subject to the requirements of the California Environmental Quality Act, the National Environmental Policy Act (NEPA), and regulations implementing Section 106 of the National Historic Preservation Act (Section 106 of the NHPA). He is well-versed in the archaeological resources of California's coastal, interior, and island settings. He is skilled in evaluation historic and prehistoric archaeological resources; agency and Native American consultation; pedestrian surveys, testing and evaluation excavations as well as archaeological and paleontological construction monitoring, and laboratory processing. During his tenure, he has authored or contributed to more than 500 technical reports and sections to support all levels of CEQA and NEPA documents. Kyle's portfolio of projects includes energy, water, and transportation infrastructure as well as residential, commercial, mixed-use, institutional, and urban redevelopment serving public and private sector clients. Kyle has conducted archaeological work throughout California and is a certified archaeologist and paleontologist in Riverside and Orange counties.

Representative Experience

Archaeological/Paleontological Monitoring. Kyle has managed more than 120 archaeological and/or paleontological construction monitoring projects in Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. His recent monitoring experience in Culver City for mixed-use development projects include Ivy Station, Culver Studios (9336 Washington Blvd), 8888 Washington Blvd, and 8777 Washington Bvld projects. His recent monitoring experience in the City of Los Angeles for mixed-use development projects include the Park Fifth Apartments (437 Hill St), Essex Hollywood (6250 Sunset Blvd), 6th and Virgil Project, 1500 Figueroa, 1340 Figueroa, and 10000 Santa Monica Blvd.

Paleontology. In addition to his archaeological work, Kyle has been cross-trained in paleontological mitigation monitoring and assisted in the excavations of a Miocene whale fossil near Irvine and a new species of extinct tuna in Laguna Niguel, California. Kyle has also managed or conducted more than 200 paleontological assessments and 40 paleontological monitoring projects throughout southern California. He has assisted ESA's paleontologists with the preparation of paleontological reports in compliance with CEQA and local paleontological guidelines, including guidelines for the Society for Vertebrate Paleontology.

Large-Scale Development Projects. Kyle directed the 1,400-acre field survey and the successful site recordation of over 150 prehistoric and historic archaeological resources per the Section 106 Process for a confidential project in

Riverside County; served as the Deputy Project Manager for the 240-acre Archaeological Treatment & Restoration Plan for The Cove project that was subject to Section 106, responsible for the field survey, Native American consultation, final report, and supervised the thorough recordation and documentation of over 350 significant artifacts. In Arizona, he led crews on a pedestrian survey and site recordation of more than 200 historic and prehistoric archaeological resources during a Class III Inventory on an 11,000-acre portion of the La Osa Ranch Project site in Pinal County.

Water Infrastructure. Kyle has performed the archaeological and paleontological resources surveys and assessments for a number of regional water infrastructure projects including the Reservoir No. 1 Reconstruction Project MND for Burbank; the Pasadena Groundwater Storage Program; and recycled water facilities projects for San Clemente, Pasadena, the Town of Rosamond, and Palmdale.

Transportation Infrastructure. Kyle is often sought after to conduct Peer Review services of controversial projects across southern California including the Needles Highway Safety Realignment Project for the County of San Bernardino, various infrastructure projects for Caltrans/San Bernardino Associated Governments, and the I-710 Corridor Project Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the City of Commerce.

In addition to road projects, Kyle has provided archaeological and paleontological services—cultural resources assessments and monitoring—on and around the Los Angeles International Airport (LAX). Among these include the cultural resources assessment of the proposed concrete pad/apron area and staging area within the southwest portion of LAX, known as the Southwest Remain Overnight Apron Project/West Aircraft Maintenance Area Project. He was also the ESA PCR cultural resources task manager for the EIR and Archaeological/Paleontological Monitoring for the LAX Central Utility Plant Replacement Project. Finally, Kyle was the PCR project manager for the archaeological and paleontological monitoring services during earthmoving operations associated with the development of the Crossfield Taxiway project. Monitoring was in compliance with the mitigation measures outlined in the Master Plan EIS/EIR pursuant to CEQA, NEPA, and Section 106.

Energy Projects. Kyle is well-versed in the potential effects of energy production projects on Southern California Archaeology through his service as an on-call consultant to Southern California Edison (SCE), where he has served as the Project Director and Manager for over 100 SCE projects and managed SCE purchase order contracts in excess of $1.5 million. These projects were subject to requirements of CEQA, Section 106 of the NHPA, and other local ordinances. These projects included deteriorated pole replacements, conduit and vault installations, and distribution circuit installations (aboveground and underground) located throughout SCE's service area in Central and Southern California. Kyle not only managed the budgets and supervised the work for these projects but also conducted most of the record searches, surveys, report writing, site recordation, and client/agency coordination for these projects. In addition to his SCE work, Kyle was the project manager for a 150-acre ground-mounted solar

power project in San Bernardino County and assisted with a 245-acre confidential petroleum exploration project on California's Central Coast.

Education Facilities. Kyle's academic experience includes conducting cultural and paleontological records searches in support of an Initial Study/MND for the proposed John Thomas Dye School Improvement project in the Bel Air Community of the city of Los Angeles; the Long Beach Unified School District's District-Wide Cultural Resources Assessment; and the University High School Beautification project. In addition, Kyle has supervised ESA PCR staff paleontologists during paleontological monitoring services for the Stephen S. Wise Middle School Relocation project in the city of Los Angeles; he also supervised the subsequent fossil identification/analysis and final report preparation services for this project. These services have been conducted pursuant to a Mitigation Monitoring and Reporting Program that was established to implement the mitigation measures identified in the EIR for the project.

Cultural Resources Sensitivity Training. He is well-versed in conducting Cultural Resources Sensitivity Training Sessions to government staff, applicants, contractors, engineers, and construction personnel with regard to the procedures to implement in the event that archaeological or paleontological resources are encountered during construction.

Geographic Information Systems. Kyle has also gained valuable experience with recording historic and prehistoric archaeological sites with Garmin, Magellan, and sub-meter Trimble GeoXT Global Positioning System (GPS) units. He has worked with GIS software such as ArcPad, ArcGIS, and ArcView and developed methods for using these products to accurately and efficiently record archaeological sites.

Presentations. Kyle presented a paper at the 72nd Annual Meeting for the Society of American Archaeology Conference in Austin, Texas in 2007. The paper focused on prehistoric 'yoni' features encountered on a project site proposed to be developed in western Riverside County, California. The project was subject to requirements of CEQA and Section 106 of the NHPA. Kyle has also presented a poster at the Society of California Archaeology Conference in Fish Camp, California in 2016 titled *Urban Archaeology Strikes Again! - 250 Years of Los Angeles History and Archaeology Uncovered in One Downtown City Block*. Kyle also presented a paper on historic archaeology and CEQA at a 2015 workshop for the California Preservation Foundation in Los Angeles.

Fatima Clark

Archaeologist

EDUCATION

BA, Anthropology, California State University, Fullerton

12 YEARS OF EXPERIENCE

PROFESSIONAL AFFILIATIONS

Society for California Archaeology

SPECIALIZED TRAINING

Section 106 Webinar, 2016

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

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

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

CERTIFICATIONS/ REGISTRATION

Orange County Certified Archaeologist

Fatima has 12 years of hands-on archaeological experience and is practiced in project management and client and agency coordination. Her field experience is complimented by the course study and participation in numerous archaeological excavations in California, Arizona, and Peru. Fatima has written California Environmental Quality Act (CEQA)-level technical reports, Environmental Impact Report (EIR) sections, Initial Study (IS) sections, archaeological peer reviews, archaeological monitoring reports, and reports pursuant to California Department of Transportation (Caltrans) requirements. She is also experienced in performing archaeological testing, site recordation, laboratory analysis, pedestrian surveys, records searches through several California Historical Resources Information Systems-Information Centers, and monitoring for a wide variety of projects, including mixed-use, residential, and energy, water, and road infrastructure projects. In addition to her archaeology background, Fatima has been cross-trained in conducting paleontological surveys and monitoring and has co-authored and managed associated reports.

Relevant Experience

Hillcrest Real Estate, LLC., Universal Hilton City, Universal City, CA (2020). *Archaeologist*. Fatima was in charge of preparing the Cultural Resources Assessment and EIR section for the project pertaining to CEQA. Fatima also coordinated the preparation of the Paleontological Resources Assessment. The project will include a new 20-story Hotel Expansion Building (with 395 guest rooms and a spa limited to guests and 250 non-guest members) with a new single-level lobby connecting to the Existing Hotel Building. The Project is located near the entrance of Universal Studios.

Irvine Ranch Water District, Syphon Reservoir Improvement Project, Orange County, CA (2018-2019). *Archaeologist.* Fatima was in charge of conducting archival research, pedestrian survey, and served as one of the lead authors of the Cultural Resources Assessment Report, pursuant to CEQA and Section 106. The survey for the study led to the relocation of two previously recorded prehistoric archaeological sites and the recordation of five additional resources, including one prehistoric isolate, one historic-period archaeological resource, and three historic architectural resources.

City of Santa Monica, Miramar Hotel Redevelopment EIR, Santa Monica, CA (2019). *Archaeologist*. Fatima was in charge of conducting archival research and preparing the Phase I Archaeological Resources Assessment for the project pertaining to CEQA. Fatima also coordinated the preparation of the Paleontological Resources Assessment. The project includes adaptive reuse of the historic Palisades Building and replacement of other buildings in order to provide a mixed-use luxury hotel with new food and beverage facilities, open space, spa,

meeting facilities, and retail space, along with residential units on the upper floors of the new buildings.

California Pacific Homes, Oaks at Monte Nido, Santa Monica Mountains, Unincorporated Los Angeles County, CA (2019-2020). *Archaeologist.* Fatima was in charge of conducting archival research, the archaeological and paleontological pedestrian survey, the preparation of the Phase I Archaeological Resources Assessment pertaining to CEQA, and assisted with the preparation of Paleontological Resources Assessment. The pedestrian survey yielded the identification of a sandstone boulder that contains a fossil impression of the skull of a small-toothed cetacean "dolphin" and the identification of fossilized shells of pelecypods (e.g., bivalves such as clams, mussels, oysters, and cockles) and gastropods (e.g., snails and slugs). The project proposes the development of 15 single-family residences on separate individual recorded parcels within the Monte Nido Community, along the scenic route of Piuma Road.

Sandstone Properties, Inc., 11469 Jefferson Hotel Project, Culver City, CA (2019). *Archaeologist.* Fatima was in charge of conducting the archival research, survey, and subsurface sensitivity assessment for archaeological resources. The project is within an area of archaeological sensitivity, and the study identified those areas with a higher likelihood to contain subsurface resources based on a review of environmental, geologic, and historic data. The project would develop a five-story, 175-room boutique hotel with below-grade parking, and would require demolition of existing commercial structures.

California Department of Water Resources, Lake Perris Seepage Recovery, Riverside County, CA (2019). *Archaeologist.* Fatima was in charge of the following tasks: archival research, survey, subsurface archaeological sensitivity assessment, analysis of direct and indirect effects to the National Register-Colorado River Aqueduct, and preparation of the Cultural Resources Assessment Report in compliance with CEQA. The proposed project would collect water that is currently seeping out of Lake Perris through an integrated recovery well system, and then provide the recovered water to the Metropolitan Water District of Southern California.

Los Angeles Department of Water and Power, Manhattan Wellfield On-Site Hypochlorite Generation Station, Los Angeles, CA (2019). *Archaeologist*. Fatima was in charge of preparing the Cultural Resources Assessment Report in compliance with CEQA and Section 106. Tasks included delineation of an Area of Potential Effects (APE), archival research, Native American outreach, desktop geoarchaeological review and subsurface sensitivity assessment, survey, reporting. The project would upgrade the existing chlorination station at Manhattan Wellfield to an on-site hypochlorite.

City of Burbank, Avion Project, Burbank, CA (2018). *Archaeologist.* Fatima was the lead author for the Cultural Resources Assessment Report and prepared the Cultural Resources section for the EIR. The project is a mixed-use development consisting of creative offices, creative industrial, retail, and a hotel located within a 61-acre Project area, which was once developed with the Lockheed-Martin B-6 site.

California Department of Water Resources, Los Robles Road Bridge Seismic Retrofit Project, Quail Lake, Los Angeles County (2018). *Archaeologist.* Fatima conducted the archival research, pedestrian survey and was the lead author for the Archaeological Resources Survey Report for the project, which pertains to CEQA. The project consisted of the seismic retrofitting of the existing Los Robles Road Bridge, which crosses the West Branch of the California Aqueduct.

Los Angeles Unified School District, San Pedro High School Comprehensive Modernization Project, Los Angeles, CA (2017-2018). *Archaeologist*. Fatima was the lead author for the Archaeological and Paleontological Resources report for the project pursuant to CEQA. The project is a site-specific school upgrade and modernization project being completed by the Los Angeles Unified School District under the School Upgrade Program. In addition to writing the report, Fatima was also the lead preparer of the Cultural Resources section of the EIR.

Los Angeles Unified School District, Burroughs Middle School Comprehensive Modernization Project, Los Angeles, CA (2018). *Archaeologist*. Fatima was the lead author for the Archaeological and Paleontological Resources report for the project pursuant to CEQA. The project would include: demolition of the Shop Building, Cafeteria/classroom buildings, and approximately 14 classrooms located in portable (relocatable) buildings; and construction of approximately 34 general and specialty classrooms, support spaces, and a new Food Services Building and Lunch Shelter. The proposed project would also include modernization and seismic retrofits to the Administration/auditorium Building, the Classroom Building, and the Gymnasium Building.

City of Burbank, Town Center Project, Burbank, CA (2018). *Archaeologist.* Fatima was in charge of preparing the Cultural Resources Assessment Report for the project. The Project is a comprehensive redevelopment of the Burbank Town Center property that would introduce a new mix of uses intended to create an integrated urban community atmosphere promoting live, work and play in Downtown Burbank.

California Water Service Company, Palos Verdes Peninsula Water Reliability Project, Palos Verdes Peninsula, CA (2017). *Archaeologist*. Fatima assisted in the preparation of the Phase I Cultural Resources Assessment report, conducted records searches and conducted the pedestrian survey for this project pursuant to Section 106. The project proposed to construct new potable water pipelines and a new booster pump station to improve overall system reliability in the Palos Verdes Peninsula.

Santa Margarita Water District, San Juan Watershed Project, San Juan Capistrano and Dana Point, CA (2017). *Archaeologist.* Fatima was the lead author for the Phase I Cultural Resources Studies for the project compliant with CEQA and Section 106 of the National Historic Preservation Act. Besides being the lead author for the report, Fatima conducted the records searches, pedestrian survey, prepared the Cultural Resources section of the EIR, and conducted

coordination with the Orange County Flood Control District in order to acquire an encroachment permit to conduct the pedestrian survey. The project is to be constructed in multiple phases. The first phase (Phase I) would include installation of three rubber dams and control buildings within San Juan Creek. Subsequent phases include additional dams within San Juan Creek and Arroyo Trabuco, recycled water recharge facilities, and additional upgrades to existing groundwater recovery facilities.

California Department of Transportation, La Costa Chevron, Encinitas, CA (2013-2017). *Project Manager.* Fatima led the archaeological services for the La Costa Chevron Project in Encinitas, which addressed Chevron-created erosion onto a Caltrans right-of-way. Because of the project site's location within a recognized archaeological site, Caltrans required an Extended Phase I (XPI). ESA conducted an XPI archaeological excavation to determine the presence or absence of archaeological deposits (and their horizontal and vertical extent) where the drainage improvements were expected to occur. Managing the company's role as a subcontractor to a larger engineering firm, Fatima coordinated with the prime consultant, the Native American groups in the area, and Caltrans. She was in charge of conducting archaeological testing, served as the primary author of the XPI, prepared the Environmentally Sensitive Area Action Plan and the Historic Resources Compliance Report.

Lennar Homes, Aidlin Property Residential Project, Los Angeles County, CA (2016). *Archaeologist.* Fatima was in charge of preparing the Section 106 report for the project. The proposed project would include the development of 102 single-family dwellings, three parks, the widening of Pico Canyon Road, and associated supporting infrastructure including local roadways, water tanks and a pump station, water quality treatment basins, and an emergency secondary fire access road. The project would also require the grading of natural topography, including slopes in order to remediate existing geologic conditions and to create stable building pads and roadways.

Lennar Homes, Aidlin Property Residential Project, Los Angeles County, CA (2014). *Archaeologist.* Fatima conducted the historical records searches through the CHRIS, pedestrian survey, the preparation of the CEQA cultural resources assessment report. The proposed project consists of a residential development on approximately 230 acres of land in an unincorporated area of Los Angeles County, California.

Southern California Edison, Archaeological Services/Contingent Employee (2008–2013), Southern California, CA. Fatima worked at Southern California Edison (SCE) as a full-time in-house consulting archaeologist in the Deteriorated Poles Program, GO 131-D Program and for the Valley South Subtransmission Project (VSSP). Fatima was in charge of managing work sent to outside consultants for surveys and preparation of archaeological reports and coordinating with consultants and SCE staff. Fatima also conducted over 100 archaeological reviews, including records searches, field surveys, project coordination, report writing for projects subject to the rules and regulations of the California Public Utilities Commission (CPUC) and thus also following CEQA-mandated requirements.

Appendix B
Sacred Lands File Search

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

November 29, 2021

Fatima Clark
ESA

Via Email to: fclark@esassoc.com

Re: Culver Crossings Project, Los Angeles County

Dear Ms. Clark:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF 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.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
11/29/2021

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393 — Gabrieleno
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693 — Gabrieleno
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

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

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490 — Gabrielino
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

Gabrielino Tongva Indians of California Tribal Council
Christina Conley, Tribal Consultant and Administrator
P.O. Box 941078 — Gabrielino
Simi Valley, CA, 93094
Phone: (626) 407 - 8761
christina.marsden@alumni.usc.edu

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

Santa Rosa Band of Cahuilla Indians
Lovina Redner, Tribal Chair
P.O. Box 391820 — Cahuilla
Anza, CA, 92539
Phone: (951) 659 - 2700
Fax: (951) 659-2228
lsaul@santarosa-nsn.gov

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

Soboba Band of Luiseno Indians
Isaiah Vivanco, Chairperson
P. O. Box 487 — Cahuilla
San Jacinto, CA, 92581 — Luiseno
Phone: (951) 654 - 5544
Fax: (951) 654-4198
ivivanco@soboba-nsn.gov

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

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