

Phase I Cultural Resources Assessment Griswold Residential Development Project Unincorporated Los Angeles County, California

USGS *Baldwin Park, California* 7.5-minute Quadrangle Map
Township 1 South, Range 10 West, Section 16
Assessor's Identification Number (AIN) 8435-006-900

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MANAGEMENT SUMMARY

At the request of the MLC Holdings, Inc., FirstCarbon Solutions (FCS) conducted a Phase I Cultural Resources Assessment (Phase I CRA) of the proposed development of 48 residential dwelling units on a 9.6-acre project site located in unincorporated Los Angeles County near the City of Covina, California. The purpose of this assessment is to identify the presence or absence of potentially significant cultural resources within the project area and, if impacted by the proposed development, propose recommendations for mitigation. Completion of this investigation fulfills the requirements associated with the California Environmental Quality Act (CEQA). This report follows the California Office of Historic Preservation (OHP) procedures for cultural resource surveys and the OHP's Archaeological Resource Management Report (ARMR) format for archaeological reports.

On February 26, 2020, a record search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. To identify any historic properties or resources, the current inventories of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Landmarks (CHL) list, the California Points of Historical Interest (CPHI) list, and the California Historical Resources Inventory (HRI) were reviewed to determine the existence of previously documented local historical resources. Results from the SCCIC indicate that two historic resources have been recorded within 0.5-mile radius, neither of which are within the project boundaries. In addition, six area-specific survey reports are on file with the SCCIC for the search radius; but not within the project site. This indicates that the project site has not been previously surveyed for cultural resources.

On November 2, 2020, FCS sent a letter to the Native American Heritage Commission (NAHC) in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on December 15, 2020, indicating that the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate project area. The NAHC included a list of seven tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential Tribal Cultural Resources (TCRs) that may be affected by the project are addressed, a letter containing project information and requesting any additional information was sent to each tribal representative on December 15, 2020. No responses have been received to date.

On November 5, 2020, FCS Staff Archaeologist, Stefanie Griffin, MA, conducted a pedestrian survey for unrecorded cultural resources at the project site. The surveyed covered the field behind Griswold School using north/south transects spaced at 15-meter intervals. All areas of proposed development were closely inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. Overall ground visibility was poor to moderate, ranging from 20 to 90 percent across areas with decayed vegetation. Soils in sections of poor visibility were intermittently inspected using a hand trowel. No prehistoric resources or materials used in the production of said resources (e.g., obsidian, Franciscan chert) were observed during the course of the pedestrian survey. Potentially historic-era glass bottle topper, blue/white ceramic fragments were found and were unearthed by rodent activity. These historic-era isolates do not qualify as historic resources under CEQA, however their presence within the project area increases the possibility that

undiscovered sub-surface archaeological deposits may be present. Also, GPA Consulting conducted a historic assessment of Griswold School and determined that the property did not meet the historic resource eligibility requirements to be listed in the CRHR, NRHP, or the Los Angeles County Landmark.

Based on the results of the records searches, Native American correspondence, architectural assessment and pedestrian survey, FCS considers the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be moderate to low. Poor soil visibility and the identification of historic-era isolates during the pedestrian survey increase the possibility that undiscovered sub-surface cultural resources may be impacted during excavation activities. FCS therefore recommends that an Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology should be present during initial grubbing and scraping of the project site. The Archaeologist should inspect soils in the cleared development areas for any indications of a sub-surface deposit or other potential archaeological features. This initial inspection may be followed by regular periodic or “spot-check” archaeological monitoring as determined necessary by the Archaeologist, however full-time monitoring is not recommended at this time. Standard procedures for the inadvertent discovery of human remains or cultural resources should be followed, and are included in the recommendations section of this report.

SECTION 1: INTRODUCTION

1.1 - Project Location and Description

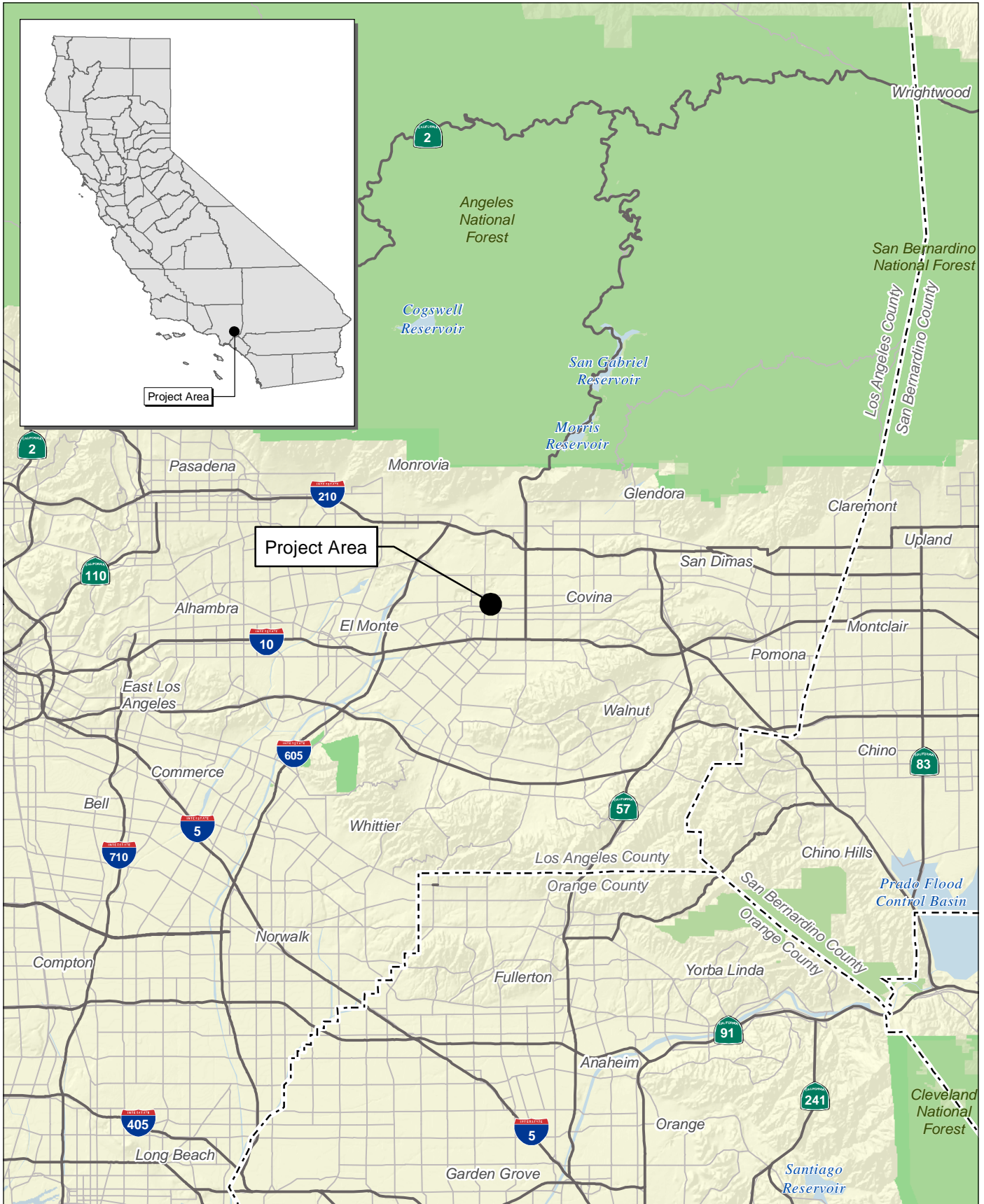
The project site is located in unincorporated Los Angeles County, California (Exhibit 1). The project site is located on the *Baldwin Park*, California United States Geological Survey (USGS) 7.5-minute topographic quadrangle, Township 1 South, Range 10 West, Section 16 (Exhibit 2). The project site is bounded by residential communities, Vincent Avenue (east), Edna Place (north), San Bernardino Road (south), and Irwindale Avenue (west) (Exhibit 3).

The proposed project consists of the development of 48 residential dwelling units on 9.6 acres, identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

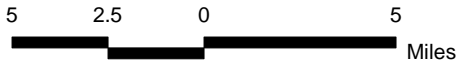
1.2 - Assessment Team

FCS Staff Archaeologist, Stefanie Griffin, MA, authored this report and conducted the pedestrian survey. Ms. Griffin exceeds the professional standards set for their respective roles by the Secretary of the Interior. Professional qualifications for Ms. Griffin can be found in Appendix A.

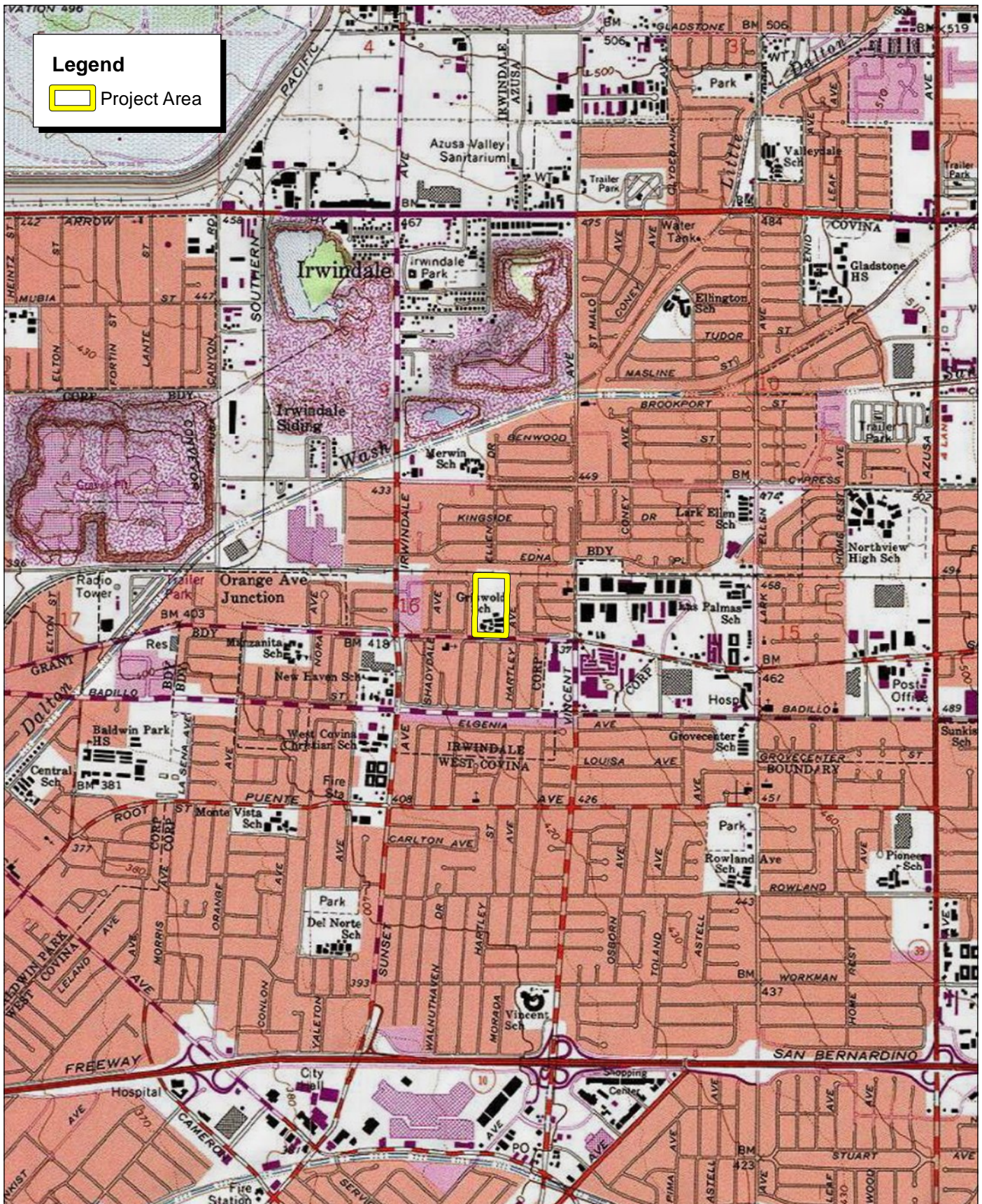
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Source: Census 2000 Data, The California Spatial Information Library (CaSIL).



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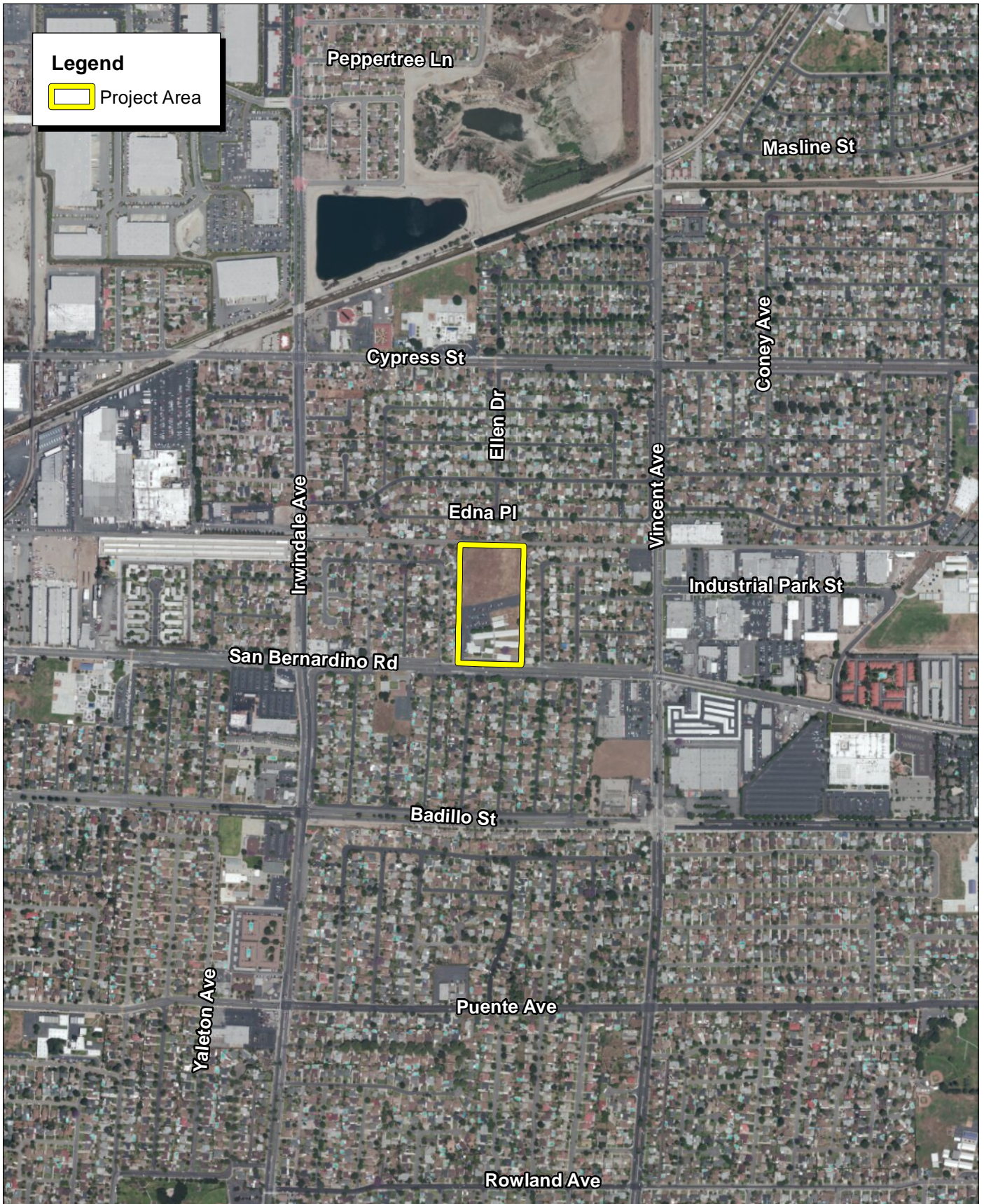


Source: USGS Baldwin Park 7.5' Quadrangle / T01S R10W Section 16



Exhibit 2 Local Vicinity Map Topographic Base

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Source: ESRI Aerial Imagery.

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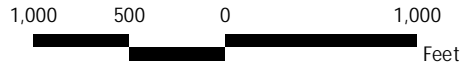


Exhibit 3
Local Vicinity Map
Aerial Base

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SECTION 2: CULTURAL SETTING

Following is a brief overview of the prehistory, ethnography, and historic background, providing context in which to understand the background and relevance of sites found in the general project area. This section is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview.

Further details can be found in ethnographic studies, mission records, and major published sources, including Beardsley (1948), Bennyhoff (1950), Fredrickson (1973), Kroeber (1925), Chartkoff and Chartkoff (1984), and Moratto (1984).

2.1 - Prehistoric and Ethnographic Background

Fagan (2003), Moratto (1984), and Chartkoff and Chartkoff (1984) provide recent overviews of California archaeology and historical reviews of the inland Southern California coast, among other locales. An early and widely used regional chronology for coastal Southern California is Wallace's four-part Horizon format (1955), which was later updated and revised by Warren (1968) and more recently by Chartkoff and Chartkoff (1984), and King (1990 and 2000). The sequence provides a framework that relates societal change to change in material culture; the advantages and weaknesses of Southern California chronological sequences are reviewed by Warren (in Moratto 1984), Chartkoff and Chartkoff (1984), and Heizer (ed. 1978).

2.1.1 - Paleoamericans

In North America, radiocarbon dates from existing samples of archaeological materials demonstrates human presence as early as 15,000 years Before Present (BP) (Waters et al. 2018). The lithics from the earliest documented sites in North America (14,000 to 15,000 BP) include cores, flakes and flake tools (e.g., 5 blades, 14 bladelets, 12 bifaces, one discoidal flake core, 23 edge-modified tools including scrapers and graters from the Debra L. Friedkin site in Texas) with an absence of projectile points (Waters et al. 2011, 2018). The first known projectile points in North America are from 13,000 years BP, with lanceolate fluted points (Clovis Complex) in sites from central and eastern North America, and stemmed projectile points from sites in non-glaciated areas of western North America (Jenkins et al. 2012; Beck and Jones 2010). Glennan (1972) provides an early study of the hypothesis of Pre-Clovis in Southern California. The oldest California radiocarbon date from archaeological materials, as of 2007, confirms a human presence in the northeastern part of the State (from site CA-SIS-218) as early as 13500 years BP (Jones and Klar 2007). The radiocarbon date corresponds to the period of fluted points and fluted points have been found throughout California (Rondeau et al. 2007; Rondeau 2009) although projectile points and other chronologically and culturally informative materials are absent from the SIS-218 sample.

Pleistocene flora and fauna are regularly uncovered from sediments at the La Brea Tar Pits, deep construction-related excavations in coastal Orange County, and the Santa Ana watershed. Such studies reinforce the idea that much of Southern California exhibited a climate similar to that of

Monterey or the San Francisco Bay area during this Period (Chartkoff and Chartkoff 1984), with slightly drier conditions away from the coast.

2.1.2 - Millingstone Complex or Early Period

During the early Post-Glacial Period, after 8500 BP, the Southern California climate became warmer and drier (Fagan 2003). Groundstone artifacts that include manos and metates correspond to the Early Period. The Early Period in Southern California begins as early or earlier than 8000 BP and ends by about 2800 BP (King 1990). The Early Period corresponds to the earliest known sites in Southern California with year-round habitation and cemeteries. Manos and metates consist of a variety of types. Mano and metates of the Early Period in Southern California correspond to types from studies in the U.S. Southwest that efficiently grind small, oily annual and biennial wild seeds (Adams 1999; Ciolek-Torello 1995; Gilman 1988; Lancaster 1984; Whittlesey 1995). Most annual and biennial wild seed plant types in Southern California are best adapted for warm and dry environments (e.g., *Hemizonia fasciculata*, which is a summer seed source). Annual and biennial seed crops are highly reliable, nutritious, and productive. Annual and biennial seed producers are also, diverse and afford reliable seed production throughout the year. Compared to later periods, utilitarian artifacts are most frequently found with Early Period burials.

Manos and metates are “kitchen tools” and concentrate within residential areas of Early Period habitation sites in Southern California (King and Merrill 2002; Merrill 2015). Other kinds of lithics that correspond to the Early Period include many kinds of core tools (e.g., hammers, choppers, and scraper planes), knives, bifaces, scrapers (many types), graters, burins, dart points, and compound bone fishhooks. Sedentism apparently increased in areas with abundant resources that were available for longer periods. Arid inland regions and offshore desert islands (e.g., San Nicolas Island) provided less opportunity for long term residence without trade and possibly for more mobile subsistence. The Early Period ends about 2800 BP (King 1990).

2.1.3 - Middle Period

The Middle Period lasted from about 2800 BP to 750 BP (King 1990). Excavated assemblages retain many attributes of the Early Period but with more diverse artifact types. Middle Period sites can contain large-stemmed or notched small projectile points suggestive of bow and arrow use, especially near the end of the Period, and the use of portable grinding tools continued. Intensive use of mortar and pestles signaled processing of acorns as the primary vegetative staple as opposed to a mixed diet of seeds and acorns. Because of a general lack of data, neither the settlement and subsistence systems nor the cultural evolution of this Period are well understood, but it is very likely that the nomadic ways continued. It has been proposed that sedentism increased with the exploitation of storable food resources, such as acorns, but coastal sites from the Period exhibit higher fishing activity than in previous periods. The first permanently occupied villages make their appearance in this Period (Chartkoff and Chartkoff 1984).

2.1.4 - Late Prehistoric

Extending from 750 BP to Spanish Contact in 1769, the Late Prehistoric includes changes in trade networks and political and secular economic subsystems. There was also a differentiation of types of

political economies. Exploitation of marine resources continued to intensify. Assemblages characteristically contain projectile points, and toward the end of the Period the size of the points decreased and notched and stemmed bases appeared, which implies the use of the bow and arrow. Use of personal ornaments such as shell beads, were widely distributed east of the coast, suggesting well-organized and codified trade networks. Additional assemblages in this Period included steatite bowls, asphaltum, grave goods, and elaborate shell ornaments. The use of bedrock milling stations was widespread during this horizon. Increased hunting efficiency and widespread exploitation of acorns provided reliable and storable food resources. Village size increased during this time, and some of these villages may have held 1,500 or more residents (Chartkoff and Chartkoff 1984). Analyses of skeletons showed that the first signs of malnutrition appeared in this Period, signaling greater competition for food resources (Fagan 2003).

The earliest part of this Period may have seen an incursion of Cupan-Takic speakers from the Great Basin (the “Shoshonean wedge” of Kroeber 1925) may have replaced the Hokan speakers in the area. At the time of Spanish conquest, Cupan-Takic speakers were distributed throughout Orange County, western Riverside County, and the Los Angeles Basin (Gabrieliño, Juaneño, and Cahuilla peoples). Serran-Takic speakers are now represented by the Serranos in the San Bernardino Mountains. Recent work (O’Neil 2002) suggests that the “Shoshonean wedge” is misnamed—the original Los Angeles inhabitants replaced by the incoming Takic-speakers may have actually been Yuman speakers (similar to those in the California Delta region of the Colorado River) and not Hokan Salinan-Seri (Chumash) speakers as was suggested by Kroeber.

At the time of Spanish conquest, local indigenous groups were composed of constantly moving and shifting clans and cultures. Early ethnographers applied the concept of territorial boundaries to local indigenous groups purely as a conceptualization device, and the data was based on fragmented information provided to them from second-hand sources.

2.1.5 - The Tongva (Gabrieliño)

Ethnographic accounts of Native Americans indicate that the Tongva (or Gabrieliño) once occupied the region that encompasses the project area. At the time of contact with Europeans, the Tongva were the main occupants of the southern Channel Islands, the Los Angeles basin, much of Orange County, and extended as far east as the western San Bernardino Valley. The term “Gabrieliño” came from the group’s association with Mission San Gabriel Arcangel, established in 1771. However, today the group prefers to be known by their ancestral name, Tongva. The Tongva are believed to have been one of the most populous and wealthy Native American tribes in Southern California prior to European contact, second only to the Chumash (Bean and Smith 1978; McCawley 1996; Moratto 1984).

The Tongva occupied numerous villages with populations ranging from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Tongva society was organized by kinship groups, with each group composed of several related families who together owned hunting and gathering territories. Settlement patterns varied according to the availability of floral and faunal resources (Bean and Smith 1978; McCawley 1996; Miller 1991). Vegetable staples consisted of acorns, chia, seeds, piñon nuts, sage, cacti, roots,

and bulbs. Animals hunted included deer, antelope, coyote, rabbits, squirrels, rodents, birds, snakes, and the Tongva also fished (Bean and Smith 1978; McCawley 1996; Miller 1991).

By the late 18th Century, Tongva population had significantly dwindled due to the introduction of diseases and dietary deficiencies. Tongva communities near the missions disintegrated as individuals succumbed to Spanish control, fled the region, or died. Later, many of the Tongva fell into indentured servitude to Anglo-Americans. By the early 1900s, few Tongva people had survived and much of their culture had been lost (Bean and Smith 1978; McCawley 1996; Miller 1991). However, in the 1970s, a revival of the Tongva culture began which continues today with growing interest and support.

2.2 - Regional Historic Background

2.2.1 - Spanish and Mexican Exploration and Settlement

The Spanish Period (1769-1821)

The first Europeans to pass through the region, what is modern day Los Angeles County, was Captain Gaspar de Portola, during the Portola expedition. Portola was accompanied by Father Juan Crespi, who played a central role in mapping the early routes of California (Beck and Hasse 1974, Hyslop 2019)). Portola and his expedition arrived in present day San Gabriel Valley on July 30, 1769, with a 64-person garrison, before continuing on their route to Monterey Bay. In 1771, the region was visited by Father Francisco Garces, who arrived at modern day San Gabriel Valley, in search of mission sites. His trek from Colorado to modern day Los Angeles county became the main overland route during the Spanish Period. On January 8, 1774, Juan Bautista de Anza, accompanied by Father Garces and Father Juan Diaz, engaged in the De Anza Expedition whose goal was to establish a colony and scout locations for Spanish Missions. Reaching Mission San Gabriel Arcangel, de Anza and 30 Spanish families form one of the first colonies in California (San Diego and San Jose supersede Mission San Gabriel), paving the way for the establishment of El Pueblo de la Reina de Los Angeles Sobre el Rio de la Porciuncula. As the influence of Mission San Gabriel grew, so did the land that it controlled. At its height, Mission San Gabriel controlled roughly 1,500,000 acres of land, extending from the ocean to the San Bernardino Mountains.

In addition to the growth of Mission influence, Los Angeles was expanding as well following the assignment of the first three land grants to three soldiers and by 1810, the population of Los Angeles County had grown to 2,537. The region continued to grow, and the success of the citrus orchards brought a lot of prosperity to the region. Nevertheless, civil unrest and fear of the liberal regime that had taken control of Spain sparked the flames of the Mexican Revolution (Beck and Williams 1972).

The Mexican Period (1821-1848)

In 1821, Mexico overthrew Spanish rule and the monopoly that the missions had in the area began to decline. By 1833, the Mexican government passed The Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings (Beattie and Beattie 1974). In an act of rebellion against The Secularization Act, Mission fathers ordered the slaughter of over 100,000 cattle (laalmanac.com 2020). Following The Secularization Act, the Mexican government initially planned on redistributing the land to the Native Americans; instead, they were redistributed to prominent citizens. The large ranchos became important financial and social centers with the focus going

towards cattle and agriculture. The prosperity in the region attracted Americans from the east to the region seeking to make their own fortune. The influx of American settlers raised tension in the region eventually leading to the Mexican-American War (1846-1848), with Mexico ceding its northern territories to the United States after the Treaty of Guadalupe Hidalgo.

2.2.2 - Los Angeles County

Los Angeles County was incorporated on February 18, 1850 as one of the original 27 counties that were incorporated following the annexation of California to the United States. Prior to European contact, Los Angeles County was originally inhabited by the Ventureño, Gabrieleño, and Fernandeano tribes (lanaic.gov 2020). The first European to enter present day Los Angeles County was Captain Gaspar de Portola, who entered the region in 1769 in what is known as the Portola Expedition. The party was on route to Northern California from San Diego in an excursion to claim the Southern and Northern California for Spain (nps.gov 2019). This was followed the establishment of the first community centered around Mission San Gabriel, which was founded by Father Junipero Serra in 1771. 10 years after the establishment of the mission, a group of 10 poblano families, recruited from Mexico, settled in a spot selected by Alta California Governor Felipe de Neve in effort to establish a new pueblo. The name of the new pueblo would be El Pueblo de la Reyna de Los Angeles (lacounty.gov 2020). The new settlement started off small, however, after the establishment of Mission San Fernando Rey de España in 1797 in the northern San Fernando Valley, drew an influx of settlers into the region. After Mexico gained its independence from Spain, trade with the United States became much more frequent as did the trade with the vessel that docked off San Pedro Harbor. During this Period, the region experienced a growth in commerce and population and by the 1840s, Los Angeles was the largest town in Southern California.

After the annexation of California and the discovery of gold in the hills southwest of the Antelope Valley, the population of Los Angeles County grew by the thousands. The exponential growth continued when gold was found in the mountains north of Los Angeles, bringing industry, trade, and commerce to the several communities that formed following the discovery of gold. After the end of the Civil War, Los Angeles County had grown to 34,520 square miles, reaching the banks of the Colorado River; however, as counties continued to form, portions of Los Angeles went to Kern County (1851), San Bernardino (1853), and Orange County (1889). Following the incorporation of Los Angeles County, the City of Los Angeles became its first city and its county seat in 1850.

The late 1860s saw a population boom as the marketing to “Go West” caught on. With the completion of the Southern Pacific Railroad in 1880 and the Santa Fe Railroad in 1886, thousands of people came to Los Angeles County, purchased land, and re-sold it thus creating a booming real estate industry. However, after the sudden collapse of financial growth in 1889, many Los Angelinos were forced to sell and/or abandon their homes. The mass exodus was short lived, as the event prompted for the creation of the Chamber of Commerce, which campaigned to bring citizens back into the county. The new settlers then benefited from prime real estate as well as fully formed local irrigation districts and numerous civic improvements (lacounty.gov 2020)

As more cities began to form within Los Angeles County, so did industry and population. The first motion picture studio to open up was the Nestor Film Company, which opened its doors in 1911 in

Hollywood and by 1930 the motion picture industry was a fully established force in the region. The establishment of Long Beach in 1911 and San Pedro Harbor and the several connecting railroad lines, facilitated the distribution of imported and local goods. Today there are 88 cities within the county and an additional 140 unincorporated communities, with a total population of 10,039,107 as of 2019 (census.gov 2020).

2.2.3 - City of Covina

The City of Covina was founded in 1882 and is located approximately 22 miles east of Downtown Los Angeles in the eastern end of Southern California’s San Gabriel Valley. Covina was named by Los Angeles Engineer Frederick Eaton, who derived the name from “cove of vines.” The City of Covina was originally part of Rancho La Puente, a 48,791-acre rancho purchased for 1,000 dollars in gold by John Rowland in 1842 (Hall 2007). Following the annexation of the California from Mexico to the United States, the Covina area, also known as “The Azusa Valley,” experienced a large wave of settlers. Two of those settlers were Antonio and Julian Badillo, who purchased 5,500 acres from John Rowlands widow with the intent to start a coffee plantation. However, in 1882 after their coffee venture failed, the Badillo brothers sold 2,000 acres to Joseph Swift Phillips, who went on to subdivide the tract and laid out the plans that would eventually become the City of Covina (TownSquare Publications 2020). In an effort to aid the arrival of settlers in the region following the Civil War, Phillips dug a water ditch from the San Gabriel Canyon to help the aspiring farmers that had to change their expectations of planting crops similar to the way that they had done in the Midwest, to crops that were able to successfully grow in the Southern California climate. This change bought forth the popularity and success of Covina’s citrus industry.

As the town of Covina grew, the first newspaper, *The Covina Independent*, was established in 1882 after Phillips offered 10-acres and 5 town lots to any journalist that would take the offer. *The Covina Independent* was the first commercial building in town. This was followed by the establishment of a grade school in 1883, which Joseph Phillips donated land and supplies for and was subsequently named after him. With the success of the Covina’s citrus industry and several other business ventures, Southern Pacific Railroad built a depot in 1895, which helped expediate the import and export of goods. This was followed by the construction of an opera house built directly across the street from the train depot. Several different businesses and trades opened up soon after, prompting citizens to push for the incorporation of the city, which occurred on August 3, 1901 (Hall 2007; TownSquare Publications 2020). Downtown Covina, with its shopping centers, hotels, restaurants, and banks became the main shopping destination for citizens of the eastern end of the San Gabriel Valley. Following World War II, the citrus industry was in decline due to a lethal virus that decimated the crops, leading growers to lose over 50 percent of their yield causing a fatal blow to their income. Several farmers were forced to sell their land, thus making way for residential neighborhoods to pop up, which were quickly filled following the end of the war. Today, Covina has grown into a modern city, specializing in retail, manufacturing, and high-tech industry, making Covina an attractive place to live.

SECTION 3: RESULTS

3.1 - Records Search

3.1.1 - South Central Coastal Information Center Records Search

On February 26, 2020, a record search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the SCCIC located at California State University, Fullerton. To identify any historic properties or resources, the current inventories of the NRHP, the CRHR, the CHL list, the CPHI list, and the HRI for San Bernardino County were also reviewed to determine the existence of previously documented local historical resources.

The results from the SCCIC indicate that two historic resources have been recorded within 0.5 mile of the project boundaries (Table 1). In addition, six area-specific survey reports are on file with the SCCIC for the search radius. The lack of recorded cultural resources or area-specific survey reports within the project site indicate that the project boundaries have not been previously surveyed for cultural resources (Table 2). SCCIC records search result can be found in Appendix B.

Table 1: Recorded Cultural Resources within a 0.50-mile Radius of the Project Site

Site Number	Resource Name/Description	Date Recorded
P-19-187085	The Mojave Road: HP37 Highway/trail	1989, 2014
P-19-187977	Foxdale Bethany Baptist Church: HP16 Religious building	2005

Source: SCCIC Record Search. February 26, 2020.

Table 2: Previous Investigations within 0.5-mile of the Project Site

Report No.	Report Title/Project Focus	Author	Date
LA-08076	Archaeological–Historical Resources Assessment of Bloomington Park and Recreation District–Two Locations.	Wayne H. Bonner	2005
LA-08149	Cultural Resources Overview: California Portion, Proposed Pacific Texas Pipeline Project.	Dana E. Supernowicz	2005
LA-08673	Verizon Site Larch, Bloomington, California. 9PP.	Wayne H. Bonner	2006
LA-09672	Cultural Resource Assessment for AT&T Wireless Facility 950-003-035, Located at 10974 Cedar Avenue, City of Bloomington, San Bernardino County, California. 23PP.	Wayne H. Bonner	2008
LA-10268	Class III Cultural Resources Survey Addendum for the Proposed Calnev Expansion Project, California Portion San Bernardino County, California.	Wayne H. Bonner and Arabesque Said	2009
LA-10641	Historical/Archaeological Resources Survey	Bai “Tom” Tang	2010

Report No.	Report Title/Project Focus	Author	Date
	Report Assessor’s Parcel Nos. 0257-021-28, 0257-031-12, and 0257-031-35 Bloomington Area, San Bernardino County, California.		
Source: SCCIC Record Search, February 26, 2020.			

3.1.2 - Historic Aerials

A review of 19 historic aerial photographs depicting the project site from 1948 until 2016 indicate that from the earliest aerial in 1948 and sometime before 1954 the project site and the surrounding general land areas were undeveloped and used for agricultural purposes (Historic Aerials 2020). The 1964 image depicts the Griswold Elementary School that was built sometime before 1964, and surrounding area depicts residential development within the City of Covina. Between 1965 and 2016 the area became more urbanized and residential development was prevalent throughout the area surrounding the project boundaries. Aerials from 1964 to 2016 exhibit the continuing development of the City.

3.1.3 - Native American Heritage Commission Record Search

On November 2, 2020, FCS sent a letter to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on December 15, 2020, indicating that the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate project area. The NAHC included a list of seven tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the project are addressed, a letter containing project information and requesting any additional information was sent to each tribal representative on December 15, 2020. No responses have been received to date. NAHC and Tribal correspondence can be found in Appendix C.

3.2 - Pedestrian Survey

On November 5, 2020, FCS Staff Archaeologist, Stefanie Griffin, MA, conducted a pedestrian survey for unrecorded cultural resources at the project site. The survey covered the field behind Griswold School (evaluated by GPA Consulting, March 2020), beginning in the southwestern corner of the field adjacent to the deteriorated parking lot, using north/south transects spaced at 15-meter intervals. Visibility during the survey was poor to moderate due to decayed vegetation and the ground was relatively flat. Soil visibility ranged from 20 to 50 percent in the areas covered by dense decayed vegetation and 90 percent in other areas containing rodent holes and modern debris. Observed soils were largely composed of light/medium brown silt sand with small gravels. The field contain four baseball diamonds located in each corner of the field. The survey was documented using digital photography and field notes. A Historic Resource Evaluation Report (HRER), conducted by GPA Consulting, of the Griswold Elementary School Campus (Griswold School) indicated that although constructed in 1953 and decommissioned in 1974 is not currently listed on the CRHR. The property is over 45 years of age and thus was evaluated as a potential resource under CEQA. GPA Consulting

determined that Griswold School did not meet any of the four criteria and concluded that the property is ineligible for listing in CRHR, NRHP, or the Los Angeles County Landmark.

During the survey, Ms. Griffin examined the exposed surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics) soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). No historic or prehistoric cultural resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were observed. Potentially historic glass bottle topper, blue/white ceramic fragments were found and were unearthed by rodent activity. These historic-era isolates do not qualify as historic resources under CEQA, however their presence within the project area increases the possibility that undiscovered sub-surface archaeological deposits may be present. Survey photographs can be found in Appendix D and the GPA Consulting HRER can be found in Appendix E.

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SECTION 4: SUMMARY AND RECOMMENDATIONS

4.1 - Summary

In accordance with CEQA Guidelines, FCS assessed the effects of development for the proposed project site. Results from the SCCIC indicate that two historic resources are on file for the 0.5 mile search radius. In addition, six area-specific survey reports are on file with the SCCIC for the search radius; but not in the project site itself, suggesting the proposed project site has not been previously surveyed for cultural resources.

The results of the NAHC Sacred Lands File search failed to identify potential TCRs that may be adversely affected by the proposed project. No responses regarding potential TCRs that may be adversely affected by the proposed project have been received to date. However, poor soil visibility and the discovery of potentially historic resources during of the field survey indicates that cultural resources may be impacted during excavation activities.

4.2 - Recommendations

Based on the results of the records searches, Native American correspondence, architectural assessment and pedestrian survey, FCS considers the potential for the proposed project to have an adverse effect on historic or prehistoric cultural resources to be moderate to low. Poor soil visibility and the identification of historic-era isolates during the pedestrian survey increase the possibility that undiscovered sub-surface cultural resources may be impacted during excavation activities. FCS therefore recommends that an Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology should be present during initial grubbing and scraping of the project site. The Archaeologist should inspect soils in the cleared development areas for any indications of a sub-surface deposit or other potential archaeological features. This initial inspection may be followed by regular periodic or “spot-check” archaeological monitoring as determined necessary by the Archaeologist, however full-time monitoring is not recommended at this time.

Additional procedures for the inadvertent discoveries of human remains and cultural resources are provided below.

4.3 - Inadvertent Discovery Procedures

4.3.1 - Accidental Discovery of Cultural Resources

It is always possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified Archaeologist shall be consulted to determine whether the resource requires further study. The qualified Archeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood,

or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the Archaeological Monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study.

4.3.2 - Accidental Discovery of Human Remains

There is always the possibility that ground-disturbing activities during construction may uncover previously unknown, buried human remains. Should this occur, Section 7050.5 of the California Health and Safety Code applies, and the following procedures shall be followed.

In the event of the accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98, or
2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission;
 - The descendant identified fails to make a recommendation; or

- The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

When an initial study identifies the existence of, or the probable likelihood of, Native American Remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains, and any items associated with Native American Burials with the appropriate Native Americans as identified by the NAHC.

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**Appendix A:
Personnel Qualifications**

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STEFANIE E. GRIFFIN, MA—STAFF ARCHAEOLOGIST

OVERVIEW

- More than 13 years of experience

Education

- Master of Arts, Interdisciplinary Studies in Prehistoric Archaeology, California State University, Stanislaus, CA
- Bachelor of Arts, Anthropology, Concentration in Prehistoric Archaeology, California State University, Stanislaus, CA

Programs

- ESRI Arc View and Arc Map

Professional Affiliations

- President, National Board of Directors, Upsilon Kappa Delta Multicultural Sorority, Inc., 2009–2015

Stefanie E. Griffin, MA, has more than 13 years of experience in anthropology and archaeology, which she gained from laboratory and field experience. She has worked with private companies and public agencies throughout California and this strengthened her knowledge of CEQA and NEPA policies. She has excellent writing, research, and organizational skills which have aided her when assigning primary and trinomial numbers for archaeological projects for counties in Central California and the development and application of cataloging systems.

RELATED EXPERIENCE AND CLIENT SUMMARY

Ritz-Carlton Napa Valley Resort Hotel Napa Data Recovery of CA-NAP-928, Napa, CA

FCS is currently assisting the US Army Corps of Engineers (USACE) with the data recovery of CA-NAP-928. FCS's Dana DePietro, PhD, RPA, as Principal Investigator, is implementing the Memorandum of Agreement (MOA) and Historic Properties Treatment Plan (HPTP) for the Ritz-Carlton Napa Valley Resort Project, which was determined to have an adverse effect on the prehistoric site CA-NAP-928. The project proponent is a private developer whose application for the hotel site (which included a wetland) prompted Section 106 review by the USACE, San Francisco District. The project would result in the complete displacement of CA-NAP-928, which was determined eligible for listing in the National Register of Historic Places under criterion D for its data potential. To address this adverse effect, the USACE and the California State Historic Preservation Office executed a MOA calling for the implementation of the HPTP. Treatment includes data recovery of the large, complex, multi-period site, involving the analysis of macrobotanical remains, lithics, fire-affected rock, obsidian hydration analysis, C-14 dating, and the treatment and recovery of faunal and human osteological remains. FCS is also working closely with Scott Gabaldon, the Chairperson of the Mishewal Wappo Tribe of Alexander Valley, who has been designated Most Likely Descendant by the Native American Heritage Commission. Mr. Gabaldon has assigned one Native American monitor to be present at the site during all ground-disturbing activities. Ms. Griffin serves as Laboratory Director and Coordinator, developing and applying a cataloging system for all

STEFANIE E. GRIFFIN, MA—STAFF ARCHAEOLOGIST

features, artifacts, and ecofacts associated with field and laboratory processing. She also facilitates data sets for the initial write-ups for phases two to five of excavation and budgeting.

Basin “EN” Construction Project Cultural Resources for the Fresno Metropolitan Flood Control District, City of Fresno, CA

The Fresno Metropolitan Flood Control District is proposing to acquire and construct a stormwater basin adjacent to Garfield and Gettysburg Avenues in Fresno, California. The project site is 16.80 acres and involves phased excavation to 25 feet below ground surface for the purposes of capturing and recharging stormwater. FCS is providing biological and cultural resource services to evaluate the potential biological effects of the project, and whether any cultural resources are present at the site for the purposes of complying with CEQA. Ms. Griffin will assist the District by providing assessments for cultural resources.

7190 Trenton/Healdsburg Road Project Biological and Cultural Resources Assessments for Green Qi, Sonoma County, CA

Ms. Griffin supported cultural resource assessment efforts for the 7190 Trenton/Healdsburg Road Project. The proposed project includes the renovation and expansion of an existing barn and cultivation of approximately 1 acre. The exact locations of these facilities have not yet been determined. As such, a comprehensive study was conducted.

Elk Grove Mixed-Use Development Air Quality and Cultural Studies for The Planning Associates Group, City of Sacramento, CA

Ms. Griffin provided cultural resource assessment services for a 2.57-acre site consisting of undeveloped land located in Sacramento, California. The site is bounded by a commercial development to the north, multifamily residential development to the south, and West Stockton Boulevard to the east. The project applicant is proposing to develop a four-story, 92-unit building with 5,200 square feet of commercial space, an 800-square-foot leasing office, and a 3,560-square-foot clubhouse.

Field Technician III, Stockton East Water District Project, InContext, City of Stockton, CA

Ms. Griffin performed Phase I initial shovel testing for municipal infrastructure development.

Field Technician, Borello Excavation Project, LSA Associates, Inc., City of Morgan Hill, CA

Ms. Griffin assisted with the rapid recovery excavation of human remains in compliance with Section 106.

Field Technician/Monitor, Southern California Edison 16-1002 Hazardous Tree Removal Program and Drought-Related Hazardous Tree Program, Environmental Intelligence, LLC, Sequoia National Forest and Sierra National Forest, CA

Ms. Griffin was first credential selection for the archaeological division of the company to lead the tree removal program in Sequoia and Sierra National Forests.

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Field Technician, #2159 Sunpower SCL-68, Far Western Anthropological Research Group, Inc., City of San Jose, CA

Ms. Griffin assisted with the excavation project for a previously recorded prehistoric site.

Field Technician, Crowder Canyon Data Recovery, Cogstone Resource Management, Inc. and Applied EarthWorks, Inc., Phelan, CA

Ms. Griffin performed excavation and data recovery of previously recorded prehistoric sites that were to be demolished for the California Department of Transportation expansion highway project.

Field Technician A, BUT 1123 Feather River West Levee Project, Far Western Anthropological Research Group, Inc., Biggs, CA

Ms. Griffin performed excavation, data recovery, laboratory analysis, and artifact processing for the USACE and Enterprise Tribal Group.

Field Technician, Forebay Dam Project 21250.01, ASM Affiliates, Inc., Pollock Pines, CA

Ms. Griffin tested and evaluated a 20th century work camp site in El Dorado County, located within the area of potential effects of the El Dorado Forebay Dam Modification Project.

Field Technician A, Feather River West Levee Project, Far Western Anthropological Research Group, Inc., Gridley, CA

Ms. Griffin reviewed residual materials, sent from the field to the laboratory, to identify all cultural artifacts; inventoried field unit artifacts in preparation for entry into the access database; performed records management; and organized and prepared artifacts to be transported and analyzed.

Field Technician B, #1944 Moke 3700-Acre Survey, Far Western Anthropological Research Group, Inc., Pioneer, CA

For Bear River Lake Resorts, Inc.'s project, Ms. Griffin conducted an archaeological survey for the US Forest Service.

Field Technician, Middle Creek Stewardship Project 23190, ASM Affiliates, Inc., Susanville, CA

Ms. Griffin assisted with Class II and Class III pedestrian surveys of 6,491 acres for the Bureau of Land Management project.

Field Technician, #1868 Mendocino Headlands Project, Far Western Anthropological Research Group, Inc., Mendocino, CA

Ms. Griffin performed exploratory excavation of shovel test units of prehistoric and historic sites.

Field Technician, #1873 Pacific Gas & Electric L107 Fremont Test Project, Far Western Anthropological Research Group, Inc., Fremont, CA

Ms. Griffin assisted in the excavation of a prehistoric site.

STEFANIE E. GRIFFIN, MA—STAFF ARCHAEOLOGIST

Field Technician A, Feather River West Levee Project, Far Western Anthropological Research Group, Inc., Live Oak, CA

Ms. Griffin participated in monitoring backhoe excavation for construction purposes, unit excavation of prehistoric and historic artifacts, review of residual materials sent from the field to the laboratory to identify all cultural artifacts, preparation of inventory of field unit artifacts for entry into the access database, records management, and organization and preparation of artifacts to be transported for analysis.

Field Technician, Sand Pass Project, Enviroscientists, Inc., Winnemucca, NV

Ms. Griffin performed a 650-acre survey of previously recorded historic sites outside Winnemucca, Nevada, particularly on a private land in Silver State Valley.

Field Technician, NAS Base Fallon Project, ASM Affiliates, Inc., Fallon, NV

Ms. Griffin performed testing and data recovery on training ranges in 37 sites, which ranged from the Paleoindian to Late Archaic eras and included historic materials.

Field Technician, Summit Exploration Survey, ASM Affiliates, Inc., Wells, NV

Ms. Griffin participated in a notice-level clearance survey of five drill pads and associated access roads of a Class III inventory of 750 acres.

Jordan Archaeological Project of La Sierra University, Riverside, Jordan

Ms. Griffin participated in the excavation field school's program, which involves one of three archaeological sites currently being excavated by the Madaba Plains Project in Jordan.

Proyecto Arqueológico Regional El Paraiso, Honduras

Ms. Griffin participated in this Honduras archaeological project, which entailed excavations at several Late Classic Period (425–825 AD) sites. She also conducted raw mineral surveys of El Paraiso Valley.

Anthropological Studies Center, Sonoma State University, City of Rohnert Park, CA

As Laboratory Assistant II, Ms. Griffin processed artifacts through cleaning, sorting and inventory. She also performed historic artifact reconstruction and collection management.

Central California Information Center, California Historical Resources Information System, California State University, Stanislaus, City of Turlock, CA

As Student Intern and Student Assistant, Ms. Griffin participated in the operations of the Central California Information Center by overseeing seven counties in Central Valley. This role entailed data processing of reports, records, and hard-copy and electronic database entries. She also directed Geographic Information System data input, such as mapping and scanning of documents, and performed quality control. Ms. Griffin conducted archaeological investigations, specifically field surveys, excavations, and laboratory analysis, for California Department of Forestry and Fire Protection (CAL FIRE) projects.

STEFANIE E. GRIFFIN, MA—STAFF ARCHAEOLOGIST

California Department of Transportation District 10, City of Stockton, CA

As Student Intern for the Environmental Planner-Archaeologist, Ms. Griffin assisted in the completion of projects and, to ensure efficiency of day-to-day tasks, filed and maintained the inventory of tracking systems of project materials. She assisted the Archaeologist with writing letters to Native American tribe consultants/monitors and participated in archaeological field surveys.

Previous Administrative Experience

Central California Information Center, City of Turlock, CA

Ms. Griffin served as Assistant Administrator where she managed the processing of archaeological reports for cultural resource management firms and corresponded with the California State Historic Preservation Office to comply with Section 106 of the Historical Preservation Act (HPA). In her previous role as Assistant Lab Administrator, she processed archaeological material for CAL FIRE to comply with Section 106 of the HPA.

California Department of Transportation District 10

Ms. Griffin was an Office Assistant to the Environmental Planner for Archaeology where she wrote correspondences to the Tribal Historical Preservation Office.

Publications

E Griffin, Stefanie (2013) “Building the Maya World: Raw Materials, Trade Routes, and Procurement Strategies in the El Paraiso Valley, Copan, Honduras”, California State University Stanislaus Press.

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**Appendix B:
South Central Coastal Information Center Records Search Results**

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Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-08076		2005	Bonner, Wayne H.	Cultural Resource Records Search and Site Visit Results for T-mobile Telecommunications Facility Candidate le5404 (sc404 Sci Covina), 500 Cutter Way, Covina, Los Angeles County, California	Michael Brandman Associates	
LA-08149		2005	Supernowicz, Dana E.	Cultural Resources Study of the Foxdale Bethany Baptist Church of West Covina Project Nextel Site No. Ca5541, 763 North Sunset Avenue, West Covina, Los Angeles County, California 91790	Historic Resource Associates	
LA-08673		2006	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, Llc Telecommunications Facility Candidate La0422a (praise Christian Fellowship Church), 1437 West Badillo Street, West Covina, Los Angeles County, California	Michael Brandman Associates	
LA-09672		2008	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for American Tower Corporation Candidate 302244 (Covina), 1476 Industrial Park Street, Covina, Los Angeles County, California	Micheal Brandman Associates	
LA-10268		2009	Bonner, Wayne H. and Arabesque Said	Cultural Resource Records Search and Site Visit Results for Verizon Wireless Candidate Morris, Lark Ellen Substation, Intersection of East Badillo St. and North Vincent Ave., Covina, Los Angeles County, CA.	MBA	19-187977
LA-10641		2010	Tang, Bai "Tom"	Preliminary Historical/Archaeological Resources Study, San Bernadino Line Positive Train Control Project, Southern California Regional Rail Authority, Counties of Los Angeles and San Bernadino	CRM Tech	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-187085		Resource Name - The Mojave Rd;	Structure, Other	Historic	HP37 (Highway/trail)	1989 (S. Elder); 2014 (Marc Beherec, AECOM)	LA-12788, LA-12808, LA-13259
P-19-187977		Resource Name - Foxdale Bethany Baptist Church	Building	Historic	HP16 (Religious building)	2005 (D. Supernowicz, Historic Resource Associates)	LA-10268

**Appendix C:
Native American Heritage Commission and Tribal Correspondence**

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Local Government Tribal Consultation List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Type of List Requested

CEQA Tribal Consultation List (AB 52) – *Per Public Resources Code § 21080.3.1, subs. (b), (d), (e) and 21080.3.2*

General Plan (SB 18) - *Per Government Code § 65352.3.*

Local Action Type:

General Plan **General Plan Element** **General Plan Amendment**

Specific Plan **Specific Plan Amendment** **Pre-planning Outreach Activity**

Required Information

Project Title: 4940.0019 Griswold Residential Development Project _____

Local Government/Lead Agency: Los Angeles County _____

Contact Person: Stefanie Griffin _____

Street Address: 650 East Hospitality Lane, Suite 125 _____

City: San Bernardino _____ **Zip:** 92408 _____

Phone: 209-608-0028 _____ **Fax:** _____

Email: sgriffin@fcs-intl.com _____

Specific Area Subject to Proposed Action

County: Los Angeles _____ **City/Community:** Covina, CA _____

Project Description:

The proposed project consists of development of an approximately 9.6-acre site, identified as Assessor's Identification Number (AIN) 8435-006-900, into a residential neighborhood (proposed project). The project site is located at 16209 West San Bernardino Road near the City of Covina, in Los Angeles County, California. Portions of the project site are currently developed with Griswold School. The remaining portion of the site is vacant. The proposed project would include the development of 71 residential dwelling units. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Additional Request

Sacred Lands File Search - Required Information:

USGS Quadrangle Name(s): Baldwin Park _____

Township: 1 S _____ **Range:** 10 W _____

Section(s): 9, 10, 15, 16 _____

NATIVE AMERICAN HERITAGE COMMISSION

December 15, 2020

Stefanie Griffin
Los Angeles County

Via Email to: sgriffin@fcs-intl.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, 4940.0019 Griswold Residential Development Project, Los Angeles County

Dear Ms. Griffin:

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

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

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

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

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

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



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Andrew Green
Cultural Resources Analyst

Attachment

December 15, 2020

Andrew Salas, Chairperson
Gabrieleno Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Chairperson Salas:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Enclosed is a Records Search map with a 0.5-mile buffer around the site for your reference.

As part of the cultural resources assessment, FCS conducted a Sacred Lands File search, which indicated negative results. In addition, FCS conducted a California Historical Resources Information System (CHRIS) search at the CCIC, which indicated no known resources are within the project site. FCS contacted the Native American Heritage Commission (NAHC), and they suggested you might be able to provide further information. If you have any additional information regarding potential historic or cultural resources in proximity or relation to the proposed project area, we would greatly appreciate your input.

Please note that this letter is a request for information pertaining to a cultural resources assessment and is not notification of a project under Senate Bill (SB) 18, Assembly Bill (AB) 52 or Section 106 of the National Historic Preservation Act. Designated lead agencies under CEQA and NEPA are handling project notification and consultation requirements. Please feel free to contact me at 209.608.0028 or via email at sgriffin@fcs-intl.com and thank you for your valuable assistance.

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Malaysia
Tel: +603 74902112
Fax: +603 79606977
15-7, Block A, Jaya ONE
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46200 Petaling Jaya
Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Anthony Morales, Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Chairperson Morales:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Enclosed is a Records Search map with a 0.5-mile buffer around the site for your reference.

As part of the cultural resources assessment, FCS conducted a Sacred Lands File search, which indicated negative results. In addition, FCS conducted a California Historical Resources Information System (CHRIS) search at the CCIC, which indicated no known resources are within the project site. FCS contacted the Native American Heritage Commission (NAHC), and they suggested you might be able to provide further information. If you have any additional information regarding potential historic or cultural resources in proximity or relation to the proposed project area, we would greatly appreciate your input.

Please note that this letter is a request for information pertaining to a cultural resources assessment and is not notification of a project under Senate Bill (SB) 18, Assembly Bill (AB) 52 or Section 106 of the National Historic Preservation Act. Designated lead agencies under CEQA and NEPA are handling project notification and consultation requirements. Please feel free to contact me at 209.608.0028 or via email at sgriffin@fcs-intl.com and thank you for your valuable assistance.

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Malaysia
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Fax: +603 79606977
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46200 Petaling Jaya
Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Robert Dorame, Chairperson
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA, 90707

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Chairperson Dorame:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Enclosed is a Records Search map with a 0.5-mile buffer around the site for your reference.

As part of the cultural resources assessment, FCS conducted a Sacred Lands File search, which indicated negative results. In addition, FCS conducted a California Historical Resources Information System (CHRIS) search at the CCIC, which indicated no known resources are within the project site. FCS contacted the Native American Heritage Commission (NAHC), and they suggested you might be able to provide further information. If you have any additional information regarding potential historic or cultural resources in proximity or relation to the proposed project area, we would greatly appreciate your input.

Please note that this letter is a request for information pertaining to a cultural resources assessment and is not notification of a project under Senate Bill (SB) 18, Assembly Bill (AB) 52 or Section 106 of the National Historic Preservation Act. Designated lead agencies under CEQA and NEPA are handling project notification and consultation requirements. Please feel free to contact me at 209.608.0028 or via email at sgriffin@fcs-intl.com and thank you for your valuable assistance.

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Malaysia
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Fax: +603 79606977
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46200 Petaling Jaya
Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Sandonne Goad, Chairperson
Gabrielino /Tongva Nation
106 1/2 Judge John Aiso St., #231
Los Angeles, CA, 90012

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Chairperson Goad:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Enclosed is a Records Search map with a 0.5-mile buffer around the site for your reference.

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46200 Petaling Jaya
Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Charles Alvarez
Gabrielino-Tongva Tribe
23454 Vanowen Street
West Hills, CA, 91307

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Mr. Alvarez:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

Enclosed is a Records Search map with a 0.5-mile buffer around the site for your reference.

As part of the cultural resources assessment, FCS conducted a Sacred Lands File search, which indicated negative results. In addition, FCS conducted a California Historical Resources Information System (CHRIS) search at the CCIC, which indicated no known resources are within the project site. FCS contacted the Native American Heritage Commission (NAHC), and they suggested you might be able to provide further information. If you have any additional information regarding potential historic or cultural resources in proximity or relation to the proposed project area, we would greatly appreciate your input.

Please note that this letter is a request for information pertaining to a cultural resources assessment and is not notification of a project under Senate Bill (SB) 18, Assembly Bill (AB) 52 or Section 106 of the National Historic Preservation Act. Designated lead agencies under CEQA and NEPA are handling project notification and consultation requirements. Please feel free to contact me at 209.608.0028 or via email at sgriffin@fcs-intl.com and thank you for your valuable assistance.

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Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Lovina Redner
Santa Rosa Band of Cahuilla Indians
P.O. Box 391820
Anza, CA 92539

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Ms. Redner:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

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Selangor, Malaysia

Sincerely,



Stefanie Estelle Griffin, M.A.
Archaeologist
FirstCarbon Solutions
250 Commerce, Suite 250
Irvine, CA 92602

Enc: Attachment A: Project location map

December 15, 2020

Scott Cozart, Chairperson
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92583

Subject: Griswold Residential Development Project, Unincorporated Los Angeles County, California

Dear Chairperson Cozart:

FirstCarbon Solutions (FCS) is preparing a Phase I Cultural Resources Assessment for the proposed Griswold Residential Development Project on behalf of MLC Holdings, Inc. As part of the environmental review process, we are conducting a cultural analysis.

The proposed project involves the development of 48 residential dwelling units on 9.6 acres identified as Assessor's Identification Number (AIN) 8435-006-900. The project site is located at 16209 West San Bernardino Road in unincorporated Los Angeles County, near Covina on the north side of West San Bernardino Road between North Walnuthaven Drive and North Hartley Avenue, south of the Southern Pacific Railway right-of-way. The project site is designated as P-Public in the General Plan. The project site is currently zoned for Light Agricultural (A-1-6000).

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Central Valley
7265 N First Street, Suite 101
Fresno, CA 93720
Inland Empire
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San Bernardino, CA 92408
Sacramento Valley
2204 Plaza Drive, Suite 210
Rocklin, CA 95765
Connecticut
2 Corporate Drive, Suite 450
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Sincerely,



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Enc: Attachment A: Project location map

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**Appendix D:
Project Area Photographs**

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Photograph 1: Overview of the former field and baseball diamonds located behind Griswold School passed the deteriorated parking lot, facing north.



Photograph 2: Overview of field with the parking lot in the foreground, facing northeast



Photograph 3: View of the survey area with baseball diamonds and residential properties in the background; facing west



Photograph 4: View of the field with Griswold School in the background; facing south.



Photograph 5: View of the field with residential properties in the background; facing east



Photograph 6: View of the field with Griswold School in the background and a baseball diamond in the foreground; facing southwest



Photograph 7: Detailed view of the blue and white ceramic fragments and the glass bottle topper .



Photograph 8: Detailed view of rodent/gopher holes present throughout surveyed area .

**Appendix E:
GPA Consulting Historic Resource Evaluation Report**

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Griswold School
16209 E. San Bernardino Road
Los Angeles County, California



Historical Resource Evaluation Report

Prepared by:
CONSULTING

G P A

March 2020



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EXECUTIVE SUMMARY

The purpose of this report is to analyze whether or not a future redevelopment project would impact historical resources defined by the California Environmental Quality Act (CEQA). The proposed project site is located at 16209 E. San Bernardino Road in Vincent, CA, a census-designated place in unincorporated Los Angeles County. The property consists of the Griswold Elementary School Campus (Griswold School) constructed in 1953. Although decommissioned as an elementary school in 1974, it remains a property within the Covina-Valley Unified School District.

The property is not currently listed under national, state, or county landmark or historic district programs. It has not been identified in any previous historic resources surveys. A records search prepared by the South Central Coastal Information Center did not indicate any prior evaluations of the property. Because the property is over 45 years of age, it was evaluated as a potential historical resource under CEQA.

After careful inspection, investigation, and evaluation, GPA has concluded that the property is ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, as well as ineligible for designation as a Los Angeles County Landmark for lack of historical significance and architectural distinction. Thus, the property is not a historical resource as defined by CEQA.

1. INTRODUCTION

1.1 Purpose

The purpose of this report is to analyze whether or not a future redevelopment project would impact historical resources as defined by the California Environmental Quality Act (CEQA). The potential project site consists of one property located at 16209 E. San Bernardino Road in Vincent, CA, a census-designated place in unincorporated Los Angeles County. The property is associated with Assessor Parcel No. 8435-006-900 and is comprised of a decommissioned public school, the Griswold School, in the Covina-Valley Unified School District (**Figure 1**).



Figure 1: Project location.

GPA Consulting (GPA) was retained to evaluate the property as a potential historical resource as it is over 45 years of age, the industry standard for the evaluation of properties as potential historical resources.

1.2 Methodology

In preparing this report, GPA performed the following tasks:



1. Reviewed records search results from the South Central Coastal Information Center (SCCIC), conducted on February 26, 2020, to determine whether or not the property is currently listed under national, state, or county landmark or historic district programs and whether or not it has been previously identified or evaluated as a potential historical resource. This involved a review of the California Historic Resources Inventory System (CHRIS), which includes data on properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities. The records search results confirmed that there were no prior evaluations of the property.
2. Conducted an intensive field inspection of the property, during which GPA assessed the general condition and physical integrity of the Griswold School campus. Digital photographs of the exterior of each building were taken during the field inspection.
3. Conducted research into the history of the property. Sources referenced included school district cards archived by the Department of General Services, Division of the State Architect, historic aerial photographs, newspaper archives, and the *Los Angeles Times* newspaper archives, available through the Los Angeles Public Library. The Covina-Valley Unified School District Maintenance, Operations, Facilities and Transportation Department were also contacted by GPA to obtain any building permit records, architectural drawings, or any other documentation on the construction history of the school campus. No records were received as of the date of this report.
4. Conducted research into the history of the surrounding area to determine the appropriate historic contexts under which to evaluate the property.
5. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to national, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the property as a potential historical resource.

1.3 Qualifications of Preparers

Audrey von Ahrens was responsible for the preparation of this report. She fulfills the qualifications for a historic preservation professional outlined in Title 36 of the Code of Federal Regulations, Part 61. Her résumé is included in **Appendix A**.

2. REGULATORY FRAMEWORK

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain statutory criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹ A lead agency may also treat a resource as historic if it meets statutory requirements and substantial evidence supports the conclusion. The National Register, California Register, and Los Angeles County Register are discussed below.

2.1 National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."²

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:³

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

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. "National Register Bulletin 15" states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is

¹ Public Resources Code §5024.1 and 14 California Code of Regulations §4850 & §15064.5(a)(2).

² Title 36 Code of Federal Regulations Part 60.2.

³ Title 36 Code of Federal Regulations Part 60.4.



made clear."⁴ A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in "National Register Bulletin 15" as "the ability of a property to convey its significance."⁵ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

Historic Districts

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."⁶

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.⁷

A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.⁸

⁴ "National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation," U.S. Department of the Interior, National Park Service, Cultural Resources, eds. Patrick Andrus and Rebecca Shrimpton, accessed August 21, 2019, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, 7-8.

⁵ "National Register Bulletin 15," 44-45.

⁶ *Ibid.*, 5.

⁷ Title 36 Code of Federal Regulations Part 60.3(d).

⁸ "National Register Bulletin 21: Defining Boundaries for National Register Properties Form," Donna J. Seifert, U.S. Department of the Interior, National Park Services, Cultural Resources, 1997, accessed January 29, 2020, <https://www.nps.gov/subjects/nationalregister/upload/Boundaries-Completed.pdf>, 12.



Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.⁹

Criteria Consideration F

Certain types of properties are not usually eligible for listing in the National Register. These properties include buildings and sites that are purely commemorative in intent. Because commemorative properties are typically designed or constructed after the occurrence of an important historic event or after the life of an important person, they would not be considered significant under Criterion A or B for lack of direct association with that significant person or event. In addition to being over fifty years old, these properties must meet a special requirement called a criteria consideration in order to be eligible for listing in the National Register. There are seven criteria considerations. Criteria Consideration F states "a property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance."¹⁰ Properties that must meet Criteria Consideration F are those whose sole purpose or primary function is commemorative.

2.2 California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹¹

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹²

⁹ "National Register Bulletin 16A: How to Complete the National Register Registration Form," U.S. Department of the Interior, National Park Service, Cultural Resources, 1997, accessed January 29, 2020, <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>, 16.

¹⁰ "National Register Bulletin 15," 39.

¹¹ Public Resources Code §5024.1 (a).

¹² Public Resources Code §5024.1 (d).



Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹³

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹⁴

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its Instructions for Recording Historical Resources provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports.

¹³ Public Resources Code §4852.

¹⁴ Public Resources Code §5024.1.



The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this report are as follows:

- 6Z** Found ineligible for National Register, California Register, or local designation through survey evaluation.

2.3 Los Angeles County Historic Preservation Ordinance

The Historic Preservation Ordinance of Los Angeles County seeks to preserve distinctive historical, architectural, and landscape characteristics that are part of the County's overall history and includes criteria and procedures for the designation of landmarks within unincorporated Los Angeles County, as well as County-owned properties.

A structure, site, object, tree, landscape, or natural land feature may be designated as a Los Angeles County Landmark if it is 50 years of age or older and satisfies one or more of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, state, county, or community in which it is located;
2. It is associated with the lives of persons who are significant in the history of the nation, state, county, or community in which it is located;
3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, state, county, or community in which it is located; or possesses artistic values of significance to the nation, state, county, or community in which it is located;
4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, state, county, or community in which it is located;



5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;
6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with an historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

A property less than 50 years of age may be designated as a County Landmark if it meets one or more of the above criteria and exhibits exceptional importance. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may be designated as a Landmark or included in the Landmark designation of a property if the space qualifies for designation as a Landmark under the applicable criteria.

In addition to one of the seven criteria above, a historic district must meet one of the following criteria:

- Concentrated or unified site with historic or thematic qualities, or
- Distinctive geographic or settlement patterns.

The County Ordinance also recognizes integrity as a requirement for designation.

3. ENVIRONMENTAL SETTING

3.1 Brief History of the Area

The Griswold School is closely surrounded by the city boundaries of West Covina to the south, Covina to the east, and Irwindale on the west (see **Figure 1**).



Figure 2: Historic aerial photograph showing project site outlined in yellow. 1934. Source: UCSB.



Figure 3: Historic aerial photograph showing project site outlined in yellow. 1960. Source: UCSB.

As depicted in historic aerials, the property and surrounding area were primarily cultivated with orchards in the 1920s and remained as such into the 1940s (see **Figure 2**). The adjacent cities began experiencing a housing boom in the late 1940s. Once residential development started, it boomed and quickly spread outside of established city boundaries. In the early 1950s, the hinterland was subdivided and developed with housing tracts (see **Figure 3**).

3.2 Description and History of the Property

Description of the Property



Figure 4: Griswold School campus, looking northeast from San Bernardino Road. March 2020. Source: GPA.

The property is located on the north side of E. San Bernardino Road on a rectangular parcel bound by the Southern Pacific Railroad tracks on the north and tract housing development to the east and west. The buildings on the school campus are all on the southern portion of the parcel such that the campus fronts E. San Bernardino Road. The campus is setback from the four-lane thoroughfare by a narrow front lawn and driveway. The long, east-west driveway has an entrance curb cut near the center of the south property line and exit curb cut at the southwest corner of the property. The asphalt driveway extends north, about half-way along the west property line before turning about 45-degrees to the west, wrapping the rear of the school campus with surface

parking. The northern half of the parcel is open field with chain-link fence batting cages at each corner the only remnants of baseball fields now overgrown. The parcel is partially enclosed on the east and west property lines by chain-link fence. A concrete wall is along the north property line.



Figure 5: Griswold School campus, looking northeast from San Bernardino Road. March 2020. Source: GPA.

The school campus consists of five buildings labeled A to G and a sixth Library building (**Figure 6**). Buildings A to G are all one-story in height and rectangular in plan, running east-west in length. The Library building is located near the center of the cluster of buildings. Unlike the other buildings, it runs north-south in length.

The buildings are all connected by covered walkways with flat roofs supported by angled metal arches. Walkways are scored concrete and are occasionally lined with metal pipe railings.

The primary materials throughout the buildings are concrete, sprayed-on stucco, metal window walls, metal louvered vents and brise soleil, and wood and metal slab doors.

It should be noted that Buildings C through G are all classroom buildings and although they vary slightly in size and number of openings, they are generally the same in composition. Nonetheless, each building is described individually below.



Figure 6: Base map courtesy of Google.

Building A: Office



Figure 7: Building A. South elevation above and north and west elevation below. 2020. Source: GPA.

Building A is the main office building. It is located near the center of the campus, oriented to the south, facing E. San Bernardino Road. The building is one-story in height, with a low pitch gabled roof with shallow, boxed eaves. The roof appears to be clad in composition roofing and exterior walls are clad in stucco.

There are four entrances on the primary (south) elevation. Each door is hollow wood slab. Fenestration on the north and south elevations consists of rows of metal, multi-light window-walls. There is one opening on the east elevation where a partially glazed, single-light wood door is located off-center from the gable peak. There are no other openings on the side (east and west) elevations.

Building B: Cafétorium



Figure 8: Building B. South and west elevation above and north and east elevation below. 2020. Source: GPA.

Building B houses the "cafetorium," which is presumably the cafeteria and auditorium space. The building is located on the southwest corner of the campus, overlooking the east driveway. The building is one-and-a-half-stories in height, with multiple, low-pitch gabled roofs with shallow, boxed eaves. A cupola with a louvered metal vent is located on the west end of the roof. The roof appears to be clad in composition roofing and exterior walls are clad in stucco.

There is one entrance on the east elevation consisting of hollow wood slab double-doors sheltered beneath the covered walkway. On the north end of the elevation are vertical, full-height pivot shades. On the north elevation, fenestration consists of vertically stacked multi-light metal windows within engaged pilasters. On the west end of the elevation is a

one-story projecting volume with flat roof where a second entrance is sheltered within a boxed entryway. The sidewalls of the volume are multi-light windows. The west elevation consists of a one-story projection with multiple entrances. There are metal slab and partially glazed wood

doors. A loading dock with metal double-doors is on the south end. Pairs of short windows and metal louvered vents are distributed across the elevation.

Building C: Classroom



Figure 9: Building C. North elevation above and west elevation below. 2020. Source: GPA.

Building C is a classroom building. It is the northeastern most building on the campus. It is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances. There are four partially glazed doors and two hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows.

There is an entrance centered on each of the side elevations.

Building D: Classroom



Figure 10: Building D. South and east elevation above and north and west elevation below. 2020. Source: GPA.

Building D is a classroom building. It is located at the southeast corner of the campus. The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances.

Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows.

The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

There are no openings on the side elevations.

Building E: Classroom



Figure 11: Building E. South and east elevation above and north elevation below. 2020. Source: GPA.

Building E is a classroom building. It is located on the east side of the campus, between Building D (south) and Building F (north). The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances.

Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows. The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the

roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

Building F: Classroom



Figure 12: Building F. South elevation above and north elevation below. 2020. Source: GPA.

Building F is a classroom building. It is located on the east side of the campus, between Building E (south) and building G (north). The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances.

Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows. The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the

roofline windows are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

Building G: Classroom



Figure 13: Building G. South elevation above and north and west elevation below. 2020. Source: GPA.

Building G is a classroom building. It is located north of the other buildings, overlooking a concrete slab with painted track adjacent to a playset. The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the gable ends and wide, overhanging eaves with fascia board on the gable sides. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the eaves on the north and south elevation are classroom entrances. There are four slab doors on the north elevation incorporated within a window-wall consisting of metal, multi-light windows.

On the south elevation, the classrooms are separated by projecting partition walls. Rows of short windows beneath the roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats.

Library Building



Figure 14: Library Building. East and north elevation. 2020. Source: GPA.

The Library building at the center of the cluster of buildings on the campus is trapezoidal in massing. It is oriented toward the east. It has a flat roof with flush eaves on the north and south. Overhanging eaves shelter a row of clerestory windows on the east and west. There is a single entrance on the east elevation consisting of a hollow metal slab door beneath a row of metal, multi-light transom windows that extend the length of the elevation. There are no openings on the side elevations.

Construction History

As stated above, the property was utilized as agricultural land before it was developed as a public school in 1953. The Griswold School was originally operated by the Covina School District.¹⁵ According to district cards for Covina-Valley, archived by the Department of General Services, Division of the State Architect, the school was designed by architect Henry L. Gogerty and constructed by contractor Wm. C. Cromwell Company. The Library building near the center of

¹⁵ "Tots may Sign up for Kindergarten," *Los Angeles Times*, May 9, 1954, H10.



the campus was constructed later. According to district cards for Covina-Valley, this building was one of eight identical libraries constructed within the District in 1961.¹⁶ The architect for the libraries was also H.L. Gogerty. In 1964, the Covina School District became the Covina-Valley Unified School District.¹⁷ In 1974, the Griswold School closed.¹⁸ It was re-opened for use by Tri-Community Adult Education by 1978.¹⁹ Research did not reveal any other major alterations to the campus.

¹⁶ Department of General Services, Division of the State Architect, Covina-Valley School District, County of Los Angeles, district cards.

¹⁷ "The Week in Review," *Los Angeles Times*, July 5, 1964, SG2.

¹⁸ "Trustees Vote to Close School," *Los Angeles Times*, March 31, 1974, SG2.

¹⁹ "Adult Education Sessions Open for Counseling Help," *Los Angeles Times*, December 28, 1978, SG6.

5. EVALUATION OF PROPERTY

5.1 National Register of Historic Places

Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history or the pattern of events or historic trends that made a significant contribution to the development of a community. The contexts considered in this evaluation for Criterion A are civic improvements and post-World War II school develop in Los Angeles County.

Up through the 1940s, this portion of Los Angeles County remained rural. Town centers were clustered around railroad stops, and there was little else in between. Individual schoolhouses were often constructed near these town centers and catered to a much larger region. In the late 1940s and early 1950s, these railroad towns and small cities experienced a postwar population boom. Student enrollment in the vicinity grew exponentially. School districts formed and used state funds to construct new schools to cater to the rising demand. In the 1950s, at least nine schools were constructed in the nearby city of West Covina alone.²⁰ Throughout the postwar period, the surrounding cities struggled to construct enough schools to keep pace with the population boom. School construction relied heavily on State funding. In the early 1960s, the State of California began providing incentives to eliminate small school districts by offering additional state funding for the first five years after a unified school district formed. In 1964, the Covina School District became the Covina-Valley Unified School District, which included grade schools and high schools under a single administrative umbrella and crossed city and county boundaries.²¹

The Griswold School campus was constructed in 1953. Research indicates that the construction of the campus was merely part of an ongoing trend of postwar school construction. Research did not reveal any evidence that the campus has an association with an important individual event. Mere association with a trend, in this case, the need for school construction to meet a growing population, is not sufficient for significance under National Register Criterion A. The association must also be significant. Therefore, it does not appear to be significant under Criterion A.

Criterion B

To be eligible for listing in the National Register under Criterion B, a property must be associated with the lives of persons significant in our past. Research did not reveal an association with specific individuals that might be significant to the history of the area. There were various principals, such as James Collins in 1957 and Delbert Smeltzer in 1958.²² While numerous people have worked at the Griswold School campus since its construction, collaborative efforts like these are better evaluated under Criteria A. The Griswold School was named after May Evangeline Griswold (Dec. 28, 1875-Dec. 1967).²³ Griswold's family were pioneers of the area and she was a long-time

²⁰ Barbara Pronin, *West Covina: Fulfilling the Promise*, (Chatsworth, CA: Windsor Publications, 1989), 75.

²¹ "The Week in Review," *Los Angeles Times*, July 5, 1964, SGA2.

²² "In the Spotlight," *Los Angeles Times*, February 17, 1957, I10; "School Principals in Covina will Change Posts," *Los Angeles Times*, June 8, 1958, SG14.

²³ "Miss May Griswold; Daughter of Pioneer," *Los Angeles Times*, December 13, 1967, B8.



schoolteacher. The following is excerpted from a *Los Angeles Times* article published in 1967 around the time of her death:

She was born in Wisconsin and came with her parents to Covina in 1879 where her father purchased land and started an orange grove. Griswold began teaching mathematics in Covina in 1906 and taught in the city's system until her retirement in 1946. Covina Griswold School was named after her.²⁴

Whether or not Griswold was an important person and significant to the history of the area, the campus would not be considered significant for an association with her or her family. According to "National Register Bulletin 15," Criterion B "is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements...Properties that pre- or post-date an individual's significant accomplishments are usually not eligible."²⁵ Because the campus was constructed after she retired as a schoolteacher, she has no direct association with the property other than her name. Therefore, the campus does not appear to be significant under Criterion B.

Criterion C

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction. Under Criterion C, the Griswold School campus was evaluated within the contexts of post-World War II school campus planning, Mid-Century Modern architecture, and the work of Henry L. Gogerty.

Individual public-school buildings and larger public-school campuses composed of numerous buildings and related features, like playgrounds and stadiums are typical of the time. Some public schools have been renamed or converted for use as charter schools or reused by the County for adult education. These postwar schools are typically located along major cross-streets in otherwise residential areas. Mid-Century Modern was the dominant architectural style for postwar school campuses. Common materials and features include brick masonry, stucco, low-pitched gabled and flat roofs, large groups of steel sash windows, clerestory windows, and covered outdoor walkways. Site planning was often emphasized over the architectural details in the design of school campuses. Campuses typically have modular or radial site planning, consisting of multiple identical, or nearly identical, buildings that are regularly arranged and connected by covered outdoor walkways.

The Griswold School campus possesses characteristics of the Mid-Century Modern style, but it is a typical example of postwar school construction conducted on a large scale using similar stylistic features and materials throughout the region. The commonly seen combination of design details and materials of this campus does not exemplify the distinctive characteristics of a type, period, or method of construction, because it is not an important example of building practices from a particular time in history. Schools of similar design and form are extant throughout Southern California and research did not reveal any reason to suggest that this campus had an impact on

²⁴ Ibid.

²⁵ "National Register Bulletin 15," 14.

this type of construction, nor does it represent an evolution or transition. Therefore, the campus is not significant under Criterion C as a type, period, or method of construction.

The architect Henry L. Gogerty designed the school campus and the individual buildings. Gogerty was hired by the school district to design a number of campuses after World War II. His schools were noted for their incorporation of flexible walls, a technique for which he was awarded a national achievement award by the American Institute of Architects.²⁶ While the Griswold School incorporates this type of design, such as the pivot-shades on the east elevation of the Cafétorium (Building B), it was typical of all his school designs. Furthermore, there is no evidence to suggest that the Griswold School was the first, or earliest extant example of his use of this technique.

Griswold designed approximately 25 projects for the Covina-Valley Unified School District, as well as many others including approximately 20 projects for the Compton Unified School District. While Gogerty is undoubtedly considered a master architect, the Griswold School campus is unlikely to be considered an important representation of his extensive portfolio of work. Within the Covina-Valley Union School District alone, it is one of many similar campus designs Gogerty completed.²⁷ The cafeteria building at the Barranca School (727 S Barranca Avenue, 1948-1953), for example, is nearly identical to that of the Griswold School (see **Figure 15**). Therefore, the Griswold School campus does not appear to be significant under Criterion C as representative of the notable work of a builder, designer or architect.



Figure 15: Barranca School. 2020. Source: Google.

While the campus is a geographically definable area containing a significant concentration of buildings united aesthetically by a plan, it is not significant as a historic district. To be eligible under this component of Criterion C, a property must also be significant under Criterion A, B, and/or another component of Criterion C, which is not the case.

While the campus is a geographically definable area containing a significant concentration of buildings united aesthetically by a plan, it is not significant as a historic district. To be eligible under this component of Criterion C, a property must also be significant under Criterion A, B, and/or another component of Criterion C, which is not the case.

Criterion D

National Register Criterion D generally applies to archaeological resources but may apply to a built resource in instances where a property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the elementary school campus. Therefore, it does not appear to be significant under Criterion D.

Criteria Consideration F

Properties that commemorate a person's achievements may be eligible under Criterion Consideration F. Criterion Consideration F specifically applies to properties "whose sole or primary

²⁶ PCAD, "Henry L. Gogerty (Architect)," accessed March 10, 2010, <http://pcad.lib.washington.edu/person/1414/>.

²⁷ Ibid.



function is commemorative or in which the commemorative function is of primary significance.”²⁸ The Griswold School campus was designed and constructed as part of an ongoing trend of postwar school construction. Many of the schools constructed at the time were named after individuals that were considered important in the community. The Griswold School's primary function is non-commemorative. Therefore, it does not appear to be significant under Criteria Consideration F.

Integrity

The property does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not necessary.

Conclusion

The Griswold School campus does not appear to be significant under National Register Criteria A, B, C, or D; therefore, it is ineligible for listing in the National Register.

5.2 California Register of Historical Resources

The California Register criteria for eligibility mirror those of the National Register. Therefore, the school campus is ineligible for listing in the California Register for the same reasons outlined above.

5.3 Los Angeles County Historic Preservation Ordinance

Likewise, because the County of Los Angeles' criteria were modeled on the National and California Registers criteria, the Griswold School campus is ineligible for designation as a Landmark for the same reasons outlined under the National Register evaluation.

²⁸ “National Register Bulletin 15,” 39.



6. CONCLUSIONS

The property is not currently designated under national, state, or local landmark programs. Furthermore, it was not identified in any previous surveys. The property was evaluated as a potential historical resource in anticipation of a proposed project in compliance with CEQA.

GPA concludes that the property does not appear to be eligible for listing in the National, California, or Los Angeles County Registers due to a lack of significance. The recommended Status Code for the property is 6Z, ineligible for designation at the national, state, and local levels through survey evaluation. Therefore, the property is not a historical resource subject to CEQA.



7. REFERENCES

Ancestry.com. Los Angeles County Voters Registration. Various Dates.

California Code of Regulations, California Office of Administrative Law, State of California Government.

California State Office of Historic Preservation, Department of Parks & Recreation. "Technical Assistance Bulletin #8: User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory." Accessed November 2019. <http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.

Code of Federal Regulations, Title 36: Parks, Forests, and Public Property. Office of the Federal Register, National Archives and Records Administration, United States Government.

Los Angeles Times. Various dates.

"National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation." National Park Service, Cultural Resources. Edited by Patrick Andrus and Rebecca Shrimpton. Accessed August 2019. <https://www.nps.gov/nr/publications/bulletins/nrb15/>.

"National Register Bulletin 16: How to Complete the National Register Registration Form." National Park Service, Cultural Resources. Linda McClelland, Carol D. Shull, James Charleton, et al. Accessed August 2019. <https://www.nps.gov/nr/publications/bulletins/nrb16a/>.

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PCAD. "Henry L. Gogerty (Architect)." Accessed March 10, 2010. <http://pcad.lib.washington.edu/person/1414/>.

Pronin, Barbara. West Covina: Fulfilling the Promise. Chatsworth, CA: Windsor Publications, 1989.

Sanborn Map Company. Various Dates. Accessed December 2019, www.proquest.com.

UCSB Library, Special Research Collections, University of California Santa Barbara. "FrameFinder Air Photos." Accessed January 2020. http://mil.library.ucsb.edu/ap_indexes/FrameFinder/.



Appendix A – Résumé



Audrey von Ahrens is an Architectural Historian II at GPA. She has been involved in the field of historic preservation since 2013. Audrey graduated from the University of Pennsylvania with a Master of Science in Historic Preservation and City Planning where she focused on preservation planning and community economic development. She has since worked in private historic preservation consulting in California. Audrey joined GPA in 2017 and her experience has included the preparation of environmental compliance documents in accordance with the California Environmental Quality Act and Section 106 of the National Historic Preservation Act; historic context statements; Secretary of the Interior's Standards analysis; large-scale historic resources surveys; and evaluations of eligibility for a wide variety of projects and property types throughout Southern California. Audrey is also experienced in coordinating with property owners and local governments in the preparation and review of Mills Act Property Contract applications and the inspection and reporting of properties applying for or with existing contracts.

Educational Background:

- M.S., Historic Preservation and Master of City Planning, University of Pennsylvania, 2016
- B.A., Architectural Studies and B.A., Urban Studies University of Pittsburgh, 2013

Professional Experience:

- GPA Consulting, Architectural Historian II, 2017-Present
- Heritage Consulting, Inc., Intern, 2015-2016
- Tacony Community Development Corp., Intern, 2014
- Pittsburgh History & Landmarks Foundation, Intern, 2013
- University of Pittsburgh, Teaching Assistant, 2012-2013
- Pittsburgh Planning Department, Intern, 2012
- Pittsburgh Downtown Partnership, Intern, 2011

Qualifications:

- Meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Activities:

- Downtown Los Angeles Neighborhood Council, Planning and Land Use Committee, Public Member Seat, 2018-present
- Downtown Los Angeles Neighborhood Council, Board of Directors, Area Wide Alternate, 2019-present

Selected Projects:

- Late 19th and Early 20th Century Residential Architecture, Los Angeles Citywide Historic Context Statement, 2019
- West Covina Historic Resources Survey and Context Statement Update, 2018-19
- CF Braun & Company Plant, Alhambra, CEQA Historical Resource Technical Report, 2018-19
- Westlake 619, Los Angeles, CEQA Historical Resource Technical Report, 2018
- Broadway Federal, Midtown Branch, CEQA Historical Resource Technical Report, 2018
- High Speed Rail, Burbank to Los Angeles Project Section, CEQA/NEPA Historical Resource Evaluation Report, 2017-2018
- Golden Avenue Bridge Replacement, Section 106 Historical Resource Evaluation Report, 2017
- Los Angeles Mills Act Program, Inspection Reports, 2017-2019
- Laguna Beach Mills Act Program, Application Reports, 2017-2019
- 91/605, Los Angeles County, Section 106 Historical Resource Evaluation Report, 2017
- 1360 N. Vine Street, Los Angeles CEQA Historical Resource Technical Report, 2017
- Sunset & Western, Los Angeles, CEQA Historical Resource Technical Report, 2017
- Hollywood Roosevelt, Los Angeles, Preservation Plan, 2017
- African American History, Los Angeles Citywide Historic Context Statement, 2017



Appendix B – DPR Forms

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Griswold Elementary School; Griswold Center

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE ¼ of SE ¼ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The property is located on the north side of E. San Bernardino Road on a rectangular parcel bound by the Southern Pacific Railroad tracks on the north and tract housing development to the east and west. The buildings on the school campus are all on the southern portion of the parcel such that the campus fronts E. San Bernardino Road. The campus is setback from the four-lane thoroughfare by a narrow front lawn and driveway. The long, east-west driveway has an entrance curb cut near the center of the south property line and exit curb cut at the southwest corner of the property. The asphalt driveway extends north, about half-way along the west property line before turning about 45-degrees to the west, wrapping the rear of the school campus with surface parking. The northern half of the parcel is open field with chain-link fence batting cages at each corner the only remnants of baseballs fields now overgrown. The parcel is partially enclosed on the east and west property lines by chain-link fence. A concrete wall is along the north property line. (See Continuation Sheet on page 3).

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking northeast, 02/05/2020

*P6. Date Constructed/Age and Source: Historic Prehistoric
 Both

1953/1961; Source: HistoricAerials.com

*P7. Owner and Address:
Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

State of California - The Resources Agency Primary #
 DEPARTMENT OF PARKS AND RECREATION HRI#
BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # (Assigned by recorder) Griswold School *NRHP Status Code 6Z
 Page 2 of 14

B1. Historic Name: Griswold School
 B2. Common Name: Same
 B3. Original Use: School B4. Present Use: Vacant
 *B5. Architectural Style: Mid-Century Modern
 *B6. Construction History: (Construction date, alterations, and date of alterations)

School campus and Buildings A-G designed and constructed in 1953; Library building constructed in 1961.

*B7. Moved? No Yes Unknown Date: _____ Original Location: _____
 *B8. Related Features: surface parking, playground equipment, baseball field batting cages.

B9a. Architect: Henry L. Gogerty b. Builder: Wm. C. Cromwell Company
 *B10. Significance: Theme post-World War II school campus planning Area Los Angeles County
 Period of Significance N/A Property Type School Applicable Criteria N/A (Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

The property was utilized as agricultural land before it was developed as a public school in 1953. The Griswold School was originally operated by the Covina School District. According to district cards for Covina-Valley, archived by the Department of General Services, Division of the State Architect, the school was designed by architect Henry L. Gogerty and constructed by contractor Wm. C. Cromwell Company. The Library building near the center of the campus was constructed later. According to district cards for Covina-Valley, this building was one of eight identical libraries constructed within the District in 1961. The architect for the libraries was also H.L. Gogerty. In 1964, the Covina School District became the Covina-Valley Unified School District. In 1974, the Griswold School closed. It was re-opened for use by Tri-Community Adult Education by 1978. (See Continuation Sheet, page 3.)

B11. Additional Resource Attributes: (List attributes and codes) None

*B12. References:
 See Continuation Sheet, page 6.

B13. Remarks:
 None

*B14. Evaluator: Audrey von Ahrens
 *Date of Evaluation: March 2020

(This space reserved for official comments.)



CONTINUATION SHEET

Property Name: Griswold School

Page 3 of 14

P3a. Description (continued from page 1)

The school campus consists of five buildings labeled A to G and a sixth Library building. Buildings A to G are all one-story in height and rectangular in plan, running east-west in length. The Library building is located near the center of the cluster of buildings. Unlike the other buildings, it runs north-south in length.

The buildings are all connected by covered walkways with flat roofs supported by angled metal arches. Walkways are scored concrete and are occasionally lined with metal pipe railings.

The primary materials throughout the buildings are concrete, sprayed-on stucco, metal window walls, metal louvered vents and brise soleil, and wood and metal slab doors.

It should be noted that Buildings C through G are all classroom buildings and although they vary slightly in size and number of openings, they are generally the same in composition. Nonetheless, each building is described individually on attached records.

B10. Significance (continued from page 2)

National Register of Historic Places

Criterion A

The contexts considered in this evaluation for Criterion A are civic improvements and post-World War II school develop in Los Angeles County.

Up through the 1940s, this portion of Los Angeles County remained rural. Town centers were clustered around railroad stops, and there was little else in between. Individual schoolhouses were often constructed near these town centers and catered to a much larger region. In the late 1940s and early 1950s, these railroad towns and small cities experienced a postwar population boom. Student enrollment in the vicinity grew exponentially. School districts formed and used state funds to construct new schools to cater to the rising demand. In the 1950s, at least nine schools were constructed in the nearby city of West Covina alone. Throughout the postwar period, the surrounding cities struggled to construct enough schools to keep pace with the population boom. School construction relied heavily on State funding. In the early 1960s, the State of California began providing incentives to eliminate small school districts by offering additional state funding for the first five years after a unified school district formed. In 1964, the Covina School District became the Covina-Valley Unified School District, which included grade schools and high schools under a single administrative umbrella and crossed city and county boundaries.

The Griswold School campus was constructed in 1953. Research indicates that the construction of the campus was merely part of an ongoing trend of postwar school construction. Research did not reveal any evidence that the campus has an association with an important individual event. Mere association with a trend, in this case, the need for school construction to meet a growing population, is not sufficient for significance under National Register Criterion A. The association must also be significant. Therefore, it does not appear to be significant under Criterion A.

Criterion B

Research did not reveal an association with specific individuals that might be significant to the history of the area. There were various principals, such as James Collins in 1957 and Delbert Smeltzer in 1958. While

CONTINUATION SHEET

Property Name: Griswold School

Page 4 of 14

numerous people have worked at the Griswold School campus since its construction, collaborative efforts like these are better evaluated under Criteria A. The Griswold School was named after May Evangeline Griswold (Dec. 28, 1875-Dec. 1967). Griswold's family were pioneers of the area and she was a long-time schoolteacher.

Whether or not Griswold was an important person and significant to the history of the area, the campus would not be considered significant for an association with her or her family. According to "National Register Bulletin 15," Criterion B "is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements...Properties that pre- or post-date an individual's significant accomplishments are usually not eligible." Because the campus was constructed after she retired as a schoolteacher, she has no direct association with the property other than her name. Therefore, the campus does not appear to be significant under Criterion B.

Criterion C

Under Criterion C, the Griswold School campus was evaluated within the contexts of post-World War II school campus planning, Mid-Century Modern architecture, and the work of Henry L. Gogerty.

Individual public-school buildings and larger public-school campuses composed of numerous buildings and related features, like playgrounds and stadiums are typical of the time. Some public schools have been renamed or converted for use as charter schools or reused by the County for adult education. These postwar schools are typically located along major cross-streets in otherwise residential areas. Mid-Century Modern was the dominant architectural style for postwar school campuses. Common materials and features include brick masonry, stucco, low-pitched gabled and flat roofs, large groups of steel sash windows, clerestory windows, and covered outdoor walkways. Site planning was often emphasized over the architectural details in the design of school campuses. Campuses typically have modular or radial site planning, consisting of multiple identical, or nearly identical, buildings that are regularly arranged and connected by covered outdoor walkways.

The Griswold School campus possesses characteristics of the Mid-Century Modern style, but it is a typical example of postwar school construction conducted on a large scale using similar stylistic features and materials throughout the region. The commonly seen combination of design details and materials of this campus does not exemplify the distinctive characteristics of a type, period, or method of construction, because it is not an important example of building practices from a particular time in history. Schools of similar design and form are extant throughout Southern California and research did not reveal any reason to suggest that this campus had an impact on this type of construction, nor does it represent an evolution or transition. Therefore, the campus is not significant under Criterion C as a type, period, or method of construction.

The architect Henry L. Gogerty designed the school campus and the individual buildings. Gogerty was hired by the school district to design a number of campuses after World War II. His schools were noted for their incorporation of flexible walls, a technique for which he was awarded a national achievement award by the American Institute of Architects. While the Griswold School incorporates this type of design, such as the pivot-shades on the east elevation of the Cafétorium (Building B), it was typical of all his school designs. Furthermore, there is no evidence to suggest that the Griswold School was the first, or earliest extant example of his use of this technique.

Griswold designed approximately 25 projects for the Covina-Valley Unified School District, as well as many others including approximately 20 projects for the Compton Unified School District. While Gogerty is undoubtedly considered a master architect, the Griswold School campus is unlikely to be considered an important representation of his extensive portfolio of work. Within the Covina-Valley Union School District

CONTINUATION SHEET

Property Name: Griswold School

Page 5 of 14

alone, it is one of many similar campus designs Gogerty completed. The cafeteria building at the Barranca School (727 S Barranca Avenue, 1948-1953), for example, is nearly identical to that of the Griswold School.

Therefore, the Griswold School campus does not appear to be significant under Criterion C as representative of the notable work of a builder, designer or architect.

While the campus is a geographically definable area containing a significant concentration of buildings united aesthetically by a plan, it is not significant as a historic district. To be eligible under this component of Criterion C, a property must also be significant under Criterion A, B, and/or another component of Criterion C, which is not the case.

Criterion D

National Register Criterion D generally applies to archaeological resources but may apply to a built resource in instances where a property may contain important information about such topics as construction techniques or human activity. In any case, the property must be the principal source of information. This is unlikely to be true for the elementary school campus. Therefore, it does not appear to be significant under Criterion D.

Criteria Consideration F

Properties that commemorate a person's achievements may be eligible under Criterion Consideration F. Criterion Consideration F specifically applies to properties "whose sole or primary function is commemorative or in which the commemorative function is of primary significance" ("National Register Bulletin 15", 39). The Griswold School campus was designed and constructed as part of an ongoing trend of postwar school construction. Many of the schools constructed at the time were named after individuals that were considered important in the community. The Griswold School's primary function is non-commemorative. Therefore, it does not appear to be significant under Criteria Consideration F.

Integrity

The property does not have historic significance; therefore, a discussion of its integrity, or its ability to convey significance, is not necessary.

Conclusion

The Griswold School campus does not appear to be significant under National Register Criteria A, B, C, or D; therefore, it is ineligible for listing in the National Register.

California Register of Historical Resources

The California Register criteria for eligibility mirror those of the National Register. Therefore, the school campus is ineligible for listing in the California Register for the same reasons outlined above.

Los Angeles County Historic Preservation Ordinance

Likewise, because the County of Los Angeles' criteria were modeled on the National and California Registers criteria, the Griswold School campus is ineligible for designation as a Landmark for the same reasons outlined under the National Register evaluation.

CONTINUATION SHEET

Property Name: Griswold School

Page 6 of 14

***B12. References:** (continued from page 2)

Ancestry.com. Los Angeles County Voters Registration. Various Dates.

California Code of Regulations, California Office of Administrative Law, State of California Government.

California State Office of Historic Preservation, Department of Parks & Recreation. "Technical Assistance Bulletin #8: User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory." Accessed November 2019.
<http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.

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UCSB Library, Special Research Collections, University of California Santa Barbara. "FrameFinder Air Photos." Accessed January 2020. http://mil.library.ucsb.edu/ap_indexes/FrameFinder/.

State of California - The Resources Agency
 DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
 HRI #
 Trinomial
NRHP Status Code 6Z

Other Listings
 Review Code

Reviewer

Date

Page 7 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building A

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building A is the main office building. It is located near the center of the campus, oriented to the south, facing E. San Bernardino Road. The building is one-story in height, with a low pitch gabled roof with shallow, boxed eaves. The roof appears to be clad in composition roofing and exterior walls are clad in stucco.

There are four entrances on the primary (south) elevation. Each door is hollow wood slab. Fenestration on the north and south elevations consists of rows of metal, multi-light window-walls. There is one opening on the east elevation where a partially glazed, single-light wood door is located off-center from the gable peak. There are no other openings on the side (east and west) elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
 Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking north, 02/05/2020

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

1953; Source: HistoricAerials.com

*P7. Owner and Address:

Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens

GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 8 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building B

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE ¼ of SE ¼ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building B houses the "cafetorium," which is presumably the cafeteria and auditorium space. The building is located on the southwest corner of the campus, overlooking the east driveway. It is one-and-a-half-stories in height, with multiple, low-pitch gabled roofs with shallow, boxed eaves. A cupola with a louvered metal vent is located on the west end of the roof. The roof appears to be clad in composition roofing and exterior walls are clad in stucco.

One entrance on the east elevation consists of hollow wood slab double-doors sheltered beneath the covered walkway. The north end has vertical, full-height pivot shades. The north elevation fenestration consists of vertically stacked multi-light metal windows within engaged pilasters. On the west end is a one-story projecting volume with flat roof and a second entrance sheltered within a boxed entryway. The sidewalls of the volume are multi-light windows. The west elevation consists of a one-story projection with multiple entrances. Doors are metal slab and partially glazed wood. A loading dock with metal double-doors is on the south end. Pairs of short windows and metal louvered vents are distributed across the elevation.

*P3b. Resource Attributes: (List attributes and codes) HP15.

Educational Building

*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking southwest, 02/05/2020

*P6. Date Constructed/Age and Source: Historic Prehistoric
 Both

1953; Source: HistoricAerials.com

*P7. Owner and Address: Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P10. Survey Type: (Describe)

Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 9 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building C

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building C is a classroom building. It is the northeastern most building on the campus. It is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances. There are four partially glazed doors and two hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows. There is an entrance centered on each of the side elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking south, 02/05/2020

*P6. Date Constructed/Age and Source: Historic Prehistoric
 Both
1953; Source: HistoricAerials.com

*P7. Owner and Address:
Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 10 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building D

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE ¼ of SE ¼ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building D is a classroom building. It is located at the southeast corner of the campus. The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances. Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows.

The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking northwest, 02/05/2020

*P6. Date Constructed/Age and Source: Historic Prehistoric
 Both
1953; Source: HistoricAerials.com

*P7. Owner and Address:
Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 11 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building E

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE ¼ of SE ¼ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building E is a classroom building. It is located on the east side of the campus, between Building D (south) and Building F (north). The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances.

Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows. The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking southeast, 02/05/2020

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

1953; Source: HistoricAerials.com

*P7. Owner and Address:

Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting

617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 12 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building F

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE ¼ of SE ¼ of Sec 16; San Bernardino B.M.B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building F is a classroom building. It is located on the east side of the campus, between Building E (south) and building G (north). The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the south, east, and west elevations, and a wide, overhanging eave with fascia board on the north elevation. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the overhanging eave on the north elevation are classroom entrances.

Partially glazed and hollow-slab doors are incorporated within a window-wall consisting of metal, multi-light windows. The south elevation is recessed from the roofline, sheltered beneath the eaves which are supported by projecting concrete partition walls. Rows of short windows beneath the roofline windows are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats. There are no openings on the side elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking northeast, 02/05/2020

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

1953; Source: HistoricAerials.com

*P7. Owner and Address:

Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting

617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

**State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD**

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 13 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Building G

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 16; San Bernardino **BB.M.**

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Building C is a classroom building. It is located north of the other buildings, overlooking a concrete slab with painted track adjacent to a playset. The building is one-story in height with a low pitch gabled roof with shallow boxed eaves on the gable ends and wide, overhanging eaves with fascia board on the gable sides. The roof appears to be clad in composition roofing and exterior walls are clad in stucco. Sheltered beneath the eaves on the north and south elevation are classroom entrances. There are four slab doors on the north elevation incorporated within a window-wall consisting of metal, multi-light windows.

On the south elevation, the classrooms are separated by projecting partition walls. Rows of short windows beneath the roofline are partially concealed by a brise soleil that extends down from the perimeter of the roof consisting of louvered metal slats.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P4. Resources Present: Building
 Structure Object Site District
Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking southeast, 02/05/2020

*P6. Date Constructed/Age and Source: Historic Prehistoric
 Both
1953; Source: HistoricAerials.com

*P7. Owner and Address:
Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting
617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 14 of 14 *Resource Name or #: (Assigned by recorder) Griswold School

P1. Other Identifier: Library

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad Baldwin Park Date 2018 T 1S; R 10W; NE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 16; San Bernardino B.M.

c. Address 16209 E. San Bernardino Road City Vincent (unincorporated LA Co.) Zip 91722

d. UTM: (Give more than one for large and/or linear resources) Zone , mE/ mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

APN: 8435-006-900

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The Library building at the center of the cluster of buildings on the campus is trapezoidal in massing. It is oriented toward the east. It has a flat roof with flush eaves on the north and south. Overhanging eaves shelter a row of clerestory windows on the east and west. There is a single entrance on the east elevation consisting of a hollow metal slab door beneath a row of metal, multi-light transom windows that extend the length of the elevation. There are no openings on the side elevations.

*P3b. Resource Attributes: (List attributes and codes) HP15. Educational Building

*P4. Resources Present: Building Structure Object Site District Element of District Other (Isolates, etc.)

P5b. Description of Photo: (view, date, accession #) View looking southwest, 02/05/2020



*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both

1961; Source: Division of the State Architect

*P7. Owner and Address:

Covina Valley Unified School District
519 E. Badillo Street
Covina, CA 91723

*P8. Recorded by: (Name, affiliation, and address) Audrey von Ahrens
GPA Consulting

617 S. Olive Street, Suite 910
Los Angeles, CA 90014

*P9. Date Recorded: 03/10/2020

*P10. Survey Type: (Describe)
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
GPA Consulting. Historical Resources Evaluation Report. 16209 E. San Bernardino Road, Los Angeles County, California. Los Angeles County: March 2020.

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List): _____

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**Appendix F:
Regulatory Framework**

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REGULATORY FRAMEWORK

Local, state, and federal government agencies have developed laws and regulations designed to protect significant cultural resources that may be affected by projects regulated, funded, or undertaken by the agency. Federal and state laws that govern the preservation of historic and archaeological resources of national, state, regional, and local significance include the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), and the California Environmental Quality Act (CEQA). In addition, laws specific to work conducted on federal lands include the Archaeological Resources Protection Act, the American Antiquities Act, and the Native American Graves Protection and Repatriation Act.

The following federal or CEQA criteria were used to evaluate the significance of potential impacts on cultural resources for the proposed project. An impact is considered significant if it would affect a resource eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), or if it is identified as a unique archaeological resource.

Federal-Level Evaluations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA), as amended, established the NRHP, which contains an inventory of the nation's significant prehistoric and historic properties. Under 36 Code of Federal Regulations 60, a property is recommended for possible inclusion on the NRHP if it is at least 50 years old, has integrity, and meets one of the following criteria:

- It is associated with significant events in history, or broad patterns of events;
- It is associated with significant people in the past;
- It embodies the distinctive characteristics of an architectural type, period, or method of construction; or it is the work of a master or possesses high artistic value; or it represents a significant and distinguishable entity whose components may lack individual distinction; or
- It has yielded, or may yield, information important in history or prehistory.

Certain types of properties are usually excluded from consideration for listing in the NRHP, but they can be considered if they meet special requirements in addition to meeting the criteria listed above. Such properties include religious sites, relocated properties, graves and cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) amended the Antiquities Act of 1906 (16 United States Code [USC] §§ 431–433) and set a broad policy that archaeological resources are important to the nation and should be protected and required special permits before the excavation or removal of archaeological resources from public or Indian lands. The purpose of the ARPA was to secure, for the

present and future benefit of the American people, the protection of archaeological resources and sites that are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) established federal policy to protect and preserve the inherent rights of freedom for Native American groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

State-Level Evaluation Processes

An archaeological site may be considered a historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California per Public Resources Code (PRC) Section 5020.1(j) or, if it meets the criteria for listing on the CRHR per the California Code of Regulations (CCR) at Title 14 CCR Section 4850.

The most recent amendments to the CEQA Guidelines direct lead agencies to first evaluate an archaeological site to determine if it meets the criteria for listing in the CRHR. If an archaeological site is a historical resource, in that it is listed or eligible for listing in the CRHR, potential adverse impacts to it must be considered as stated in PRC Sections 21084.1 and 21083.2(l). If an archaeological site is considered not to be a historical resource but meets the definition of a “unique archeological resource” as defined in PRC Section 21083.2, then it would be treated in accordance with the provisions of that section.

With reference to PRC Section 21083.2, each site found within a project area will be evaluated to determine if it is a unique archaeological resource. A unique archaeological resource is described as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

As used in this report, a “non-unique archaeological resource” means an archaeological artifact, object, or site that does not meet the criteria for eligibility for listing on the CRHR, as noted in subdivision (g) of PRC Section 21083.2. A non-unique archaeological resource requires no further consideration, other than the simple recording of its components and features. Isolated artifacts are typically considered non-unique archaeological resources. Historic structures that have had their superstructures demolished or removed can be considered historic archaeological sites and are evaluated following the processes used for prehistoric sites. Finally, the California State Office of Historic Preservation recognizes an age threshold of 45 years. Cultural resources built less than 45 years ago may qualify for consideration, but only under the most extraordinary circumstances.

Title 14 of the CCR, Chapter 3, Section 15064.5, is associated with determining the significance of impacts to archaeological and historical resources. Here, the term historical resource includes the following:

1. A resource listed in, or determined eligible by the State Historical Resources Commission, for listing in the CRHR (PRC § 5024.1; Title 14 CCR § 4850, et seq.).
2. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the PRC Section 5024.1(g) requirements, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the CRHR (PRC § 5024.1; Title 14 CCR § 4852) including the following:
 - A. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
 - B. Is associated with the lives of persons important in our past.
 - C. 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.
 - D. Has yielded, or may be likely to yield, information important in prehistory or history.

Typically, archaeological sites exhibiting significant features qualify for the CRHR under Criterion D because such features have information important to the prehistory of California. A lead agency may

determine that a resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1, even if it is:

- Not listed in or determined to be eligible for listing in the CRHR.
- Not included in a local register of historical resources pursuant to PRC Section 5020.1(k).
- Identified in a historical resources survey per PRC Section 5024.1(g).

California Register of Historical Resources

As defined by Section 15064.5(a)(3)(A-D) of the California Environmental Quality Act (CEQA) Guidelines, a resource shall be considered historically significant if the resource meets the criteria for listing on the CRHR. The CRHR and many local preservation ordinances have employed the criteria for eligibility to the NRHP as a model, since the NHPA provides the highest standard for evaluating the significance of historic resources. A resource that meets the NRHP criteria is clearly significant. In addition, a resource that does not meet the NRHP standards may still be considered historically significant at a local or State level.

California Environmental Quality Act

The CEQA Guidelines state that a resource need not be listed on any register to be found historically significant. CEQA Guidelines direct lead agencies to evaluate archaeological sites to determine if they meet the criteria for listing in the CRHR. If an archaeological site is a historical resource, in that it is listed or eligible for listing in the CRHR, potential adverse impacts to it must be considered. If an archaeological site is considered not to be a historical resource but meets the definition of a “unique archeological resource” as defined in Public Resources Code Section 21083.2, then it would be treated in accordance with the provisions of that section.

Native American Heritage Commission Sacred Lands Inventory

Section 5097.91 of the Public Resources Code established whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. This inventory is referred to as the NAHC Sacred Lands File. Under Section 5097.9 of the Public Resources Code, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the Public Resources Code specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a County Coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Assembly Bill 52—Effects on Tribal Cultural Resources

AB 52 was signed into law on September 25, 2014, and provides that any public or private “project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” TCRs include “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local

register of historical resources.” Under prior law, TCRs were typically addressed under the umbrella of “cultural resources,” as discussed above. AB 52 formally added the category of “tribal cultural resources” to CEQA, and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to Senate Bill 18 (SB 18) as discussed above.

The parties must consult in good faith, and consultation is deemed concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists); or (2) when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place.
- Protecting the cultural character and integrity of the resource.
- Protecting the traditional use of the resource.
- Protecting the confidentiality of the resource.
- Permanent conservation easements with culturally appropriate management criteria.

Threshold of Significance

If a project will have a significant impact on a cultural resource, several steps must be taken to determine if the cultural resource is a “unique archaeological resource” under CEQA. If analysis and/or testing determine that the resource is a unique archaeological resource and therefore subject to mitigation prior to development, a threshold of significance should be developed. The threshold of significance is a point where the qualities of significance are defined, and the resource is determined to be unique under CEQA. A significant impact is regarded as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource will be reduced to a point that it no longer meets the significance criteria. Should analysis indicate that project development will destroy the unique elements of a resource; CEQA Guidelines require that the project implement appropriate and feasible mitigation measures. The preferred form of mitigation is to preserve the resource in place, in an undisturbed state. However, as that is not always possible or feasible, appropriate mitigation measures may include, but are not limited to:

1. Planning construction to avoid the resource.
2. Deeding conservation easements.
3. Capping the site prior to construction.

If a resource is determined to be a “non-unique archaeological resource,” no further consideration of the resource by the lead agency is necessary.

Tribal Consultation

The following serves as an overview of the procedures and timeframes for the Tribal Consultation process, for the complete Tribal Consultation Guidelines, please refer to the State of California Office of Planning and Research website.

Prior to the amendment or adoption of general or specific plans, local governments must notify the appropriate tribes of the opportunity to conduct consultation for the purpose of preserving or mitigating impacts to cultural places located on land within the local government's jurisdiction that is affected by the plan adoption or amendment. The tribal contacts for this list are maintained by the NAHC and are distinct from the Most Likely Descendent (MLD) list. It is suggested that local governments send written notice by certified mail with return receipt requested. The tribes have 90 days from the date they receive notification to request consultation. In addition, prior to adoption or amendment of a general or specific plan, local government must refer the proposed action to tribes on the NAHC list that have traditional lands located within the city or county's jurisdiction. Notice must be sent regardless of prior consultation. The referral must allow a 45-day comment period.

In brief, notices from the local government to the tribes should include:

- A clear statement of purpose.
- A description of the proposed general or specific plan, the reason for the proposal, and the specific geographic areas affected.
- Detailed maps to accompany the description.
- Deadline date for the tribes to respond.
- Government representative(s) contact information.
- Contact information for project proponent/applicant, if applicable.

The basic schedule for this process is:

- **30 days:** time the NAHC has to provide tribal contact information to the local government; this is recommended, not mandatory.
- **90 days:** time the tribe has to respond indicating whether or not they want to consult. Note: tribes can agree to a shorter timeframe. In addition, consultation does not begin until/unless requested by the tribe within 90 days of receiving notice of the opportunity to consult. The consultation period, if requested, is open-ended. The tribes and local governments can discuss issues for as long as necessary or productive, and need not result in agreement.
- **45 days:** time the local government has to refer proposed action, such as adoption or amendment to a general or specific plan, to agencies, including the tribes. Referral is required even if there has been prior consultation. This opens the 45-day comment period.
- **10 days:** time the local government has to provide the tribes with notice of a public hearing.

California Assembly Bill 52—Effects on Tribal Cultural Resources

AB 52 amended the CEQA statute to identify an additional category of resource to be considered under CEQA, called “tribal cultural resources.” It added PRC Section 21074, which defines “tribal cultural resources” as follows:

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

Local Regulations

Los Angeles County Regulations General Plan 2035

Goals and Policies for Historic, Cultural, and Paleontological Resources

Historic, cultural, and paleontological resources are an important part of Los Angeles County’s identity. This section sets forth goals and policies for the management and preservation of historic, cultural, and paleontological resources in the unincorporated areas.

Goal/Policies C/NR 14: Protected historic, cultural, and paleontological resources.

- Policy C/NR 14.1** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Policy C/NR 14.2** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- Policy C/NR 14.3** Support the preservation and rehabilitation of historic buildings.
- Policy C/NR 14.4** Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004 Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.
- Policy C/NR 14.6** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

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