

Appendix J

Tribal Cultural Resources

Appendix J.1

TCR Assessment

TECHNICAL MEMORANDUM

To: Dan Coté
NREA-TRA 700, LLC
700 S Flower Street, Suite 450
Los Angeles, California 90017

From: Chris Millington, Senior Archaeologist
David K. Sayre, Staff Archaeologist
Erica Nicolay, Project Manager

Date: December 19, 2023

Re: **Tribal Cultural Resources Assessment for The Bloc Residential Tower and Sign Supplemental Use District Project, City of Los Angeles, California**

INTRODUCTION

NREA-TRC 700, LLC (Project Applicant) retained SWCA Environmental Consultants (SWCA) to prepare a tribal cultural resources review for the proposed construction of a new residential high-rise tower and Sign Supplemental Use District (Project) in the Central City Community Plan (Community Plan) area of the City of Los Angeles (City). The Project site is a 186,674-square-foot (4.285-acre) property known as The Bloc, which is located at 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street (Project Site). The new 53-story tower address will be 775 South Hope Street. The Project Site comprises an entire City block that is currently developed with hotel and commercial uses and associated parking and contains a portal to the 7th Street/Metro Central rail station. The proposed development of a new tower will occur within the southern half of the Project Site (the Development Area) within the footprint of the existing podium building and extending multiple stories above the existing podium, which will be expanded to 12 stories. Parking spaces will be included in eight above ground parking levels in the expanded podium building and in one existing basement level. The Project also proposes a Sign Supplemental Use District (SUD) that establishes signage standards for the entire Project Site and includes digital display signs, non-digital identification signs, and digital kiosks.

The Project is subject to review under the California Environmental Quality Act (CEQA), and the City of Los Angeles (City) is the lead CEQA agency. This technical memorandum provides a review of available evidence for any known tribal cultural resources within the Project Site and analyzes the likelihood (i.e., sensitivity) of as-yet unknown tribal cultural resources that could be present in the Project Site as a buried deposit. The results of this study are intended to provide a basis upon which the potential for impacts to tribal cultural resources can be determined in accordance with the significance thresholds in Appendix G of CEQA Guidelines. This study includes a summary of resources identified in the California Historical Resources Information System (CHRIS) by the South Central Coastal Information Center (SCCIC), the results of a Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC), and background research used to assess the potential for a buried resource. The CHRIS and SLF results are included in Attachments A and B, respectively.

The report also assessed information submitted by one California Native American tribe, Gabrieleño Band of Mission Indians – Kizh Nation, who requested consultation with the City pursuant to Public Resources Code (PRC) Section 21082.3.1, as amended by Assembly Bill (AB) 52. This memorandum includes a summary of the City’s compliance with applicable tribal consultation requirements. SWCA’s analysis also includes a review of confidential information submitted during the tribal consultation as a means of providing a factual basis upon which the City can determine whether substantial information exists for a tribal cultural resource, and thereby inform the analysis of potential for impacts and, if necessary, ensure that appropriate means of mitigation and treatment have been identified. Among the materials submitted during tribal consultation are some information that is already publicly available, which meets the exemption criteria described in PRC 21082.3(c)(2) and allows for public disclosure as part of the environmental review process; however, because the Gabrieleño Band of Mission Indians – Kizh Nation specifically requested all information be treated as confidential, the entire correspondence record and attachments are designated here in a confidential appendix that shall be omitted from publicly circulated drafts of this report, as well as copies submitted to the Project Applicant. Otherwise, this report includes a generalized summary of information submitted during consultation but omits the details contained therein.

The legislative intent published with AB 52 (Gatto 2014) makes it clear that when determining impacts and mitigation to a tribal cultural resource, tribal values are intended to be considered *in addition to* scientific and archaeological values. Accordingly, the analysis and conclusions put forward here are not intended to substitute for tribal expertise and may not necessarily reflect tribal values. Rather, this memorandum is based upon SWCA’s archaeological expertise, focuses on archaeological sources of evidence, and historical data, and uses scientific methods that are consistent with standard industry practices.

This report was prepared by David K. Sayre, B.A., Chris Millington, M.A., Registered Professional Archaeologist, and Erica Nicolay, M.A. Mr. Millington meets the Secretary of the Interior Professional Qualification Standards in archaeology and the Society for California Archaeology’s standards for a principal investigator. Copies of this report are on file with the Project Applicant, City Planning, and the SCCIC at California State University, Fullerton. All background materials are on file with SWCA’s office in Pasadena, California, and is referenced under project 75519 and report no. 22-853.

PROJECT LOCATION

The Project Site is in the downtown area of Los Angeles and occupies a block that is bound by 7th Street to the north, 8th Street to the south, Flower Street to the west, and Hope Street to the east (Figure 1 and Figure 2). The Project Site comprises one parcel designated as Assessor’s Parcel Number (APN) 5144-010-401, -405, -408, -421, -422, -423 and -425. The Project is in Sections 29 and 32 of Township 1 South, Range 13 West, and is plotted on the U.S. Geological Survey (USGS) Hollywood, California, quadrangle (Figure 3).



Figure 1. Project vicinity.



Figure 2. Project location plotted on a 2017 aerial photograph.

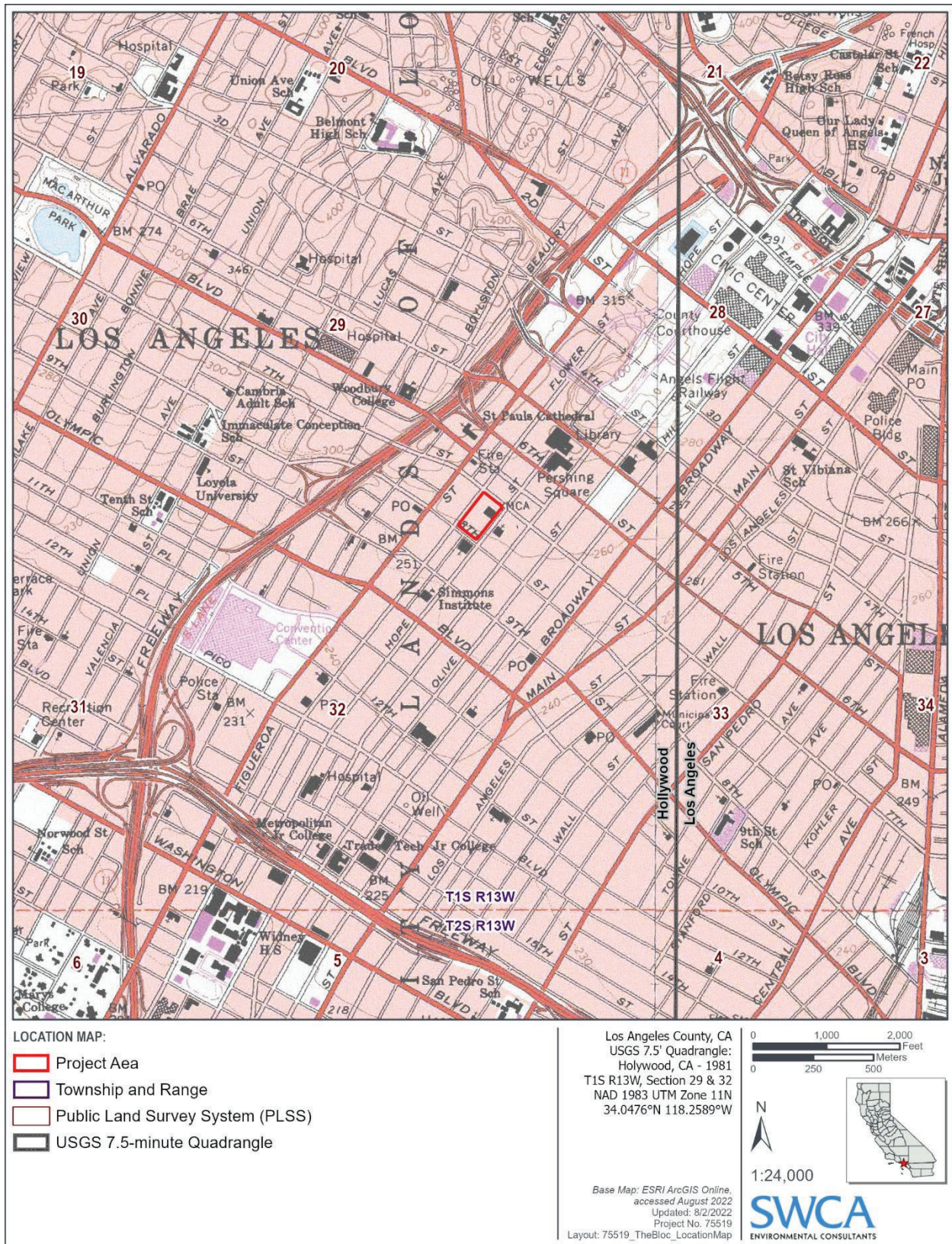


Figure 3. Project location plotted on USGS Hollywood, California 7.5-minute quadrangle.

REGULATORY SETTING

State Regulations

Assembly Bill 52

AB 52 (Gatto 2014) went into effect on January 1, 2015. The bill amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 21074(a) provides the following set of criteria defining a tribal cultural resource as 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 California Register of Historical Resources.
 - (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.

Subdivision (b) of PRC Section 21074 adds that a tribal cultural resource may also be a cultural landscape provided if it meets the criteria of subdivision (a), so long as the landscape is geographically defined in size and scope. Subdivision (c) of PRC Section 21074 clarifies that so long as the criteria in subdivision (a) are satisfied, the status as a unique or non-unique archaeological resource is not factored into the determination of whether a resource is a tribal cultural resource.

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 added Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that will avoid significant impacts to a tribal cultural resource.”

AB 52 TRIBAL CONSULTATION

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the NAHC, regardless of federal recognition. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency makes a decision to undertake a project, the lead agency has 14 days to formally notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given Project Site who had requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contact information for the agency contact, and notice that the California Native American tribe has 30 days to request, in writing, consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe’s request for consultation. Furthermore, consultation must be initiated prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

Consistent with the stipulations stated in Senate Bill 18 (Government Code Section 65352.4), consultation pursuant to PRC Section 21080.3.1 may include discussion concerning the type of environmental review, the significance of the project's impacts on the tribal cultural resources, and, if necessary, project alternatives or the appropriate measures for preservation and mitigation that the California Native American tribe may recommend to the lead agency (PRC Section 21080.3.2[a]).

The consultation shall be considered concluded under either of the two following conditions: (1) the parties agree to measures mitigating or avoiding a significant effect, if one exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that agreement cannot be reached (PRC Section 21082.3.2[b]).

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

California Register of Historical Resources

Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP) and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR. According to PRC Section 5024.1(c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- **Criterion 2:** It is associated with the lives of persons important in our past.
- **Criterion 3:** It 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.
- **Criterion 4:** It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR.

Most Native American archaeological sites that may be a tribal cultural resource lack identifiable or important association with specific persons or events of regional or national history (Criteria 1 and 2), and/or lack the formal and structural attributes necessary to qualify as eligible under Criterion 3.

A Native American archaeological site may be considered significant (and by extension be considered a tribal cultural resource) if it displays one or more of the following attributes (OHR 1991): chronologically diagnostic, functionally diagnostic, or exotic artifacts; datable materials; definable activity areas; multiple components; faunal or floral remains; archaeological features; notable complexity, size, integrity, time span, or depth; or stratified deposits. Determining the period(s) of occupation at a site provides a context for the types of activities undertaken and may well supply a link with other sites and cultural processes in the region. Further, well-defined temporal parameters can help illuminate processes of culture change and continuity in relation to natural environmental factors and interactions with other cultural groups. Finally, chronological controls might provide a link to regionally important research questions and topics of more general theoretical relevance. As a result, the ability to determine the temporal parameters of a site's occupation is critical for a finding of eligibility under Criterion 4 (information potential). A site that cannot be dated is unlikely to possess the quality of significance required for CRHR eligibility. The content of an archaeological site provides information regarding its cultural affiliations, temporal periods of use, functionality, and other aspects of its occupation history. The range and variability of artifacts present in the site can allow for reconstruction of changes in diet, social structure, technology, and other aspects of culture.

Treatment of Human Remains

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code Section 7050.5. More specifically, remains suspected to be Native American are treated under CEQA at CCR Section 15064.5; PRC Section 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedures shall be observed.

- Stop immediately and contact the County Coroner:
1104 North Mission Road
Los Angeles, California 90033
(323) 343-0512 (8:00 a.m. to 5:00 p.m. Monday through Friday) or
(323) 343-0714 (after hours, Saturday, Sunday, and holidays)
- If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

ENVIRONMENTAL SETTING

The Project Site is in the Los Angeles Basin, a broad, level plain defined by the Pacific Ocean to the west, the Santa Monica Mountains and Puente Hills to the north, and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments (California Geological Survey 2010; Dibblee 1991). The Project Site is mapped within geological units defined as undivided young alluvial fan deposits (Qyf) (Yerkes and Campbell 2005). The Qyf unit is composed of unconsolidated gravel, sand and silt deposited primarily from flooding streams and debris flows (Yerkes and Campbell 2005:7).

The Los Angeles Basin is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana rivers. The Project Site is located approximately 4.2 km (2.6 miles) south of the confluence of the Los Angeles River and the Arroyo Seco. Largely thanks to the reliable flow of water from these sources, the location has been ideal for human habitation, both before and after the arrival of European settlers. The Project Site is located at an elevation of ranging approximately 79 to 82 m (260–269 feet) above mean sea level.

Historically, the Los Angeles River shifted course with frequency across the basin and inundated large areas within its flood plain. The now-channelized course of the Los Angeles River is located approximately 2.6 km (1.6 miles) east of the Project Site, though historically the channel has shifted courses several times during flood events. The first recorded shift of the river occurred in 1815 when floodwaters overflowed the former channel, shifting the course at least 0.8 km (0.5 mile) to the southwest, near the present route of Spring Street. That flood is reported to have destroyed structures built as part of the original Los Angeles Pueblo (Gumprecht 2001:139–141) and may have also flooded all or parts of the Native American site of Yaanga, which is believed to have been located nearby (discussed below).

Some of the shifts in the river’s course were more dramatic. Before 1825, the river flowed west from what is now downtown Los Angeles and discharged into the Ballona Wetlands in what is now Playa del Rey. The river followed a western course approximated by Washington Boulevard and then turned southwest at the Baldwin Hills, flowing along the northwest-facing side of the slopes—the course now occupied by Ballona Creek (Gumprecht 2001:17). Heavy rains in 1825 caused the channel to overflow its banks and the Los Angeles River shifted its course fully south, emptying into the bay near San Pedro, where the river has discharged ever since. In subsequent years, the river will frequently shift its course within the southern floodplain, which in some areas measures up to 2 miles wide (Gumprecht 2001:16). However, these more dramatic shifts between the western and southern routes are likely to have occurred during most of the life of the watercourse, and certainly over during the last 13,000 years—the period in which there is evidence of Native Americans in southern California. Flood events such as those recorded in more recent history have produced massive deposits of alluvial sediments within the respective floodplains. Alluvial terraces formed where flooding water eroded into uplifted landforms. In the downtown Los Angeles area, the backslopes in the location of Bunker Hill delineate the edge of the historical floodplain.

CULTURAL SETTING

Native American Archaeological Record

Numerous chronological sequences have been devised to aid in understanding cultural changes within southern California. The Native American archaeological record in California is generally divided into three broad temporal periods (i.e., Paleoindian, Archaic, and Emergent periods; see Fredrickson 1973, 1974, 1994) that reflect similar cultural characteristics throughout the state and were generally governed by climatic and environmental variables, such as the drying of pluvial lakes at the transition from the Paleoindian to the Lower Archaic. Numerous chronological sequences were also devised to aid in understanding cultural changes on a smaller scale, within the subregion of southern California specifically. Building on early studies and focusing on data synthesis and artifact types, Wallace (1955, 1978) developed a chronology for southern California comprised of four sequential horizons: Early Man (Horizon I); Milling Stone (Horizon II); Intermediate (Horizon III); and Late Prehistoric (Horizon IV). The regional cultural chronology is summarized in Table 1 (adapted from Wallace 1955, 1978). This original synthesis lacked chronological precision initially, however, the advent of radiocarbon dating in the 1950s allowed researchers to further refine and revise these periods as radiocarbon datasets grew and additional analyses were conducted resulting in more refined chronologies and sequences (e.g., Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2002; Mason and Peterson 1994; see also

Moratto 1984). Additional primary syntheses for the Native American archaeological record in southern California were developed by Warren (1968) and King (1981, 1990), which utilized the growing archaeological datasets of specific subregions within southern California to define increasingly localized cultural sequences.

Table 1. Native American Archaeological Chronology

Period	Key Characteristics	Date Range
Early Man	<ul style="list-style-type: none"> • Diverse mixture of hunting and gathering • Greater emphasis on hunting 	ca. 10,000–6000 B.C.
Milling Stone	<ul style="list-style-type: none"> • Subsistence strategies centered on collecting plant foods and small animals • Extended and loosely flexed burials 	6000–3000 B.C.
Intermediate	<ul style="list-style-type: none"> • Shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods • Trend toward greater adaptation to regional or local resources • Fully flexed burials, placed facedown or faceup, and oriented toward the north or west 	3000 B.C.–A.D. 500
Late Prehistoric	<ul style="list-style-type: none"> • Increase in the use of plant food resources, as well as an increase in land and sea mammal hunting • Increase in the diversity and complexity of material culture • Increased usage of the bow and arrow • Increase in population size, accompanied by the advent of larger, more permanent villages 	A.D. 500–ca. 1769

Ethnographic Overview

The Project Site is in an area historically occupied by the Gabrielino (Bean and Smith 1978:538; Kroeber 1925:Plate 57). Surrounding Native American groups included the Chumash to the northwest, the Tataviam/Alliklik to the north, who traditionally occupied the San Fernando Valley and some of the surrounding areas, the Serrano to the east, and the Luiseño/Juaneño to the south (Figure 4). There was well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name “Gabrielino” (sometimes spelled Gabrieleno or Gabrieleño) is a term designated through Spanish custom, which named local tribes according to an affiliated mission. Native Americans affiliated with Mission San Gabriel Arcángel were named “Gabrielino,” and those affiliated with Mission San Fernando were historically referred to as “Fernandeño” (Kroeber 1925:Plate 57). There is little evidence that the people we call Gabrielino had a broad term for their group (Dakin 1978:222). Instead, they reportedly identified themselves as inhabitants of a specific community with locational suffixes; for example, a resident of Yaanga was referred to as a Yabit, much the same way that a resident of New York is called a New Yorker (Johnston 1962:10).



Figure 4. Native American territorial boundaries based on ethnographic and tribal sources.

Native words suggested as labels for the broader group of Native Americans indigenous to the Los Angeles region include (or Tong-v; Merriam 1955:7–86) and Kizh (Kij or Kichereño; Heizer 1968:105). Tongva, or Tong-vā (Merriam 1955:77–86), was a term for the people living near Tejon, but the similar sounding Tōṅwe was the name for a village near San Gabriel. Tobikhar may have been used to denote the people living near San Gabriel, which means “settlers,” and is possibly derived from tobohar or tovaar, meaning “earth” (McCawley 1996:9). Kizh, Kij, or Kichereño (Kroeber 1907:141; Sugranes 1909:29) may be derived from the word meaning “houses.” The term was first recorded by Horatio Hale between 1838 and 1842 as the name of the language spoken at San Gabriel Mission (Barrows 1900:12). One of Harrington’s (1942) native advisors specifically attached the name to people living in the Whittier Narrows area, near San Gabriel Mission’s original location, stating that “Kichereño is not a placename, but a tribename, the name of a kind of people” (McCawley 1996:43).

Many present-day descendants of these people have taken on Tongva and Kizh as a preferred group name, in part because of the Native American rather than Spanish origin (King 1994:12). Because there is no agreement over the most appropriate indigenous term for this group, the term Gabrielino is used in the remainder of this report to designate Native people of the Los Angeles Basin and southern Channel Islands and their descendants.

Gabrielino lands encompassed the greater Los Angeles Basin and three Channel Islands: San Clemente, San Nicolas, and Santa Catalina. Their mainland territory was bounded on the northwest by the Chumash at Topanga Creek, the Serrano at the San Gabriel Mountains in the east, and the Juaneño on the south at Aliso Creek (Bean and Smith 1978:538; Kroeber 1925:636). The mainland area occupied by the Gabrielino included four macro-environmental zones (Interior Mountains/Adjacent Foothills, Prairie, Exposed Coast, and Sheltered Coast) that encompass the watersheds of the Los Angeles, Santa Ana, and San Gabriel Rivers (Bean and Smith 1978:538).

The Gabrielino subsistence economy centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like for most Native Californians, acorns were their staple food (an established industry by the time of the Early Intermediate period). Inhabitants supplemented acorns with the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978:546; Kroeber 1925:631–632; McCawley 1996:119–123, 128–131).

The Gabrielino used a variety of tools and implements to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996:7). Gabrielino people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925:629; McCawley 1996:129–138).

At the time of Spanish contact, the basis of Gabrielino religious life was the Chinigchinich religion, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions and also taught the people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925:637–638). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the southern Takic groups even as Christian missions were being built and may represent a mixture of Native and Christian belief and practices (McCawley 1996:143–144).

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996:157). Remains were buried in distinct burial areas, either associated with villages or without apparent village association (see Stanton et al. 2016). Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966:27), as well as scattered among broken ground stone implements (Cleland et al. 2007). Archaeological data such as these correspond to ethnographic descriptions of an elaborate mourning ceremony that included a variety of offerings, such as seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (Dakin 1978:234–365; Johnston 1962:52–54; McCawley 1996:155–165).

Relocating Former Native American Settlements

In general, it has proven difficult to establish the precise location of Native American settlements occupied immediately preceding and following Spanish arrival in California approximately 250 years ago (McCawley 1996:31–32). Many of the settlements and so-called villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point Native American lifeways had been irrevocably changed. McCawley quotes Kroeber (1925:616) in his remarks on the subject, writing that “the opportunity to prepare a true map of village locations ‘passed away 50 years ago’” (McCawley 1996:32).

Several factors have confounded efforts at relocating former Native American settlements. Firstly, many settlements were recorded with alternative names and spellings. Second, there have been conflicting reports on the meaning and locational reference of the placenames. In addition to differences in the interpretation of a given word, some of the placenames refer to a site using relatively vague terms that could fit several possible locations, or the word may reference a natural feature that no longer exists, such as a type of plant that once grew in an area now fully urbanized.

Third and perhaps most importantly, Native American placenames recorded in historic records and reported in oral histories did not necessarily represent a continually occupied settlement within a discrete location, which is how the term ‘village’ is commonly understood today. Instead, in at least some cases, the settlements were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features that were subject to change over generations (Ciolek-Torello and Garraty 2016; Johnston 1962:122). Furthermore, the criteria for what constitutes a village site has been especially lacking in consistency and specificity, even within a strictly academic context (see summary by Ciolek-Torello and Garraty [2016:69]). Much of the debate in this regard concerns whether sites were occupied on a permanent or temporary basis, and archaeological data do not always provide unequivocal evidence to make a reliable classification for a given site.

Within the range of terms put forth to characterize different types of Native American settlements, there are conventions and core insights shared among scholars. Native American archaeological sites in coastal California, for example, are commonly referenced in archaeological sources as residential sites, habitation sites, and seasonal camps, whereas the term village is more often used to reference Mission period settlements such as the Chumash site of Humaliwo, Helo’, and Muwu, or Luiseño sites such as Topomai (Ciolek-Torello and Garraty 2016:69). These Spanish and Mexican period sites are also known as rancherías—a term with connotations for a more permanent settlement, which is often used synonymously with village.

Native American Communities in the Downtown Los Angeles Area

Although the precise location of any given Native American settlement or placename is subject to some speculation, ethnographic sources and contemporary oral histories of descendant communities have recorded the names and approximate locations of former settlements across the Los Angeles Basin. Supplementing these placenames with archaeological and historical data helps to expand the picture of Native American land uses and settlement patterns over time. Figure 5 shows some of the named settlements and a sample of archaeological sites included in the CHRIS. Among the named settlements occupied prior to Spanish colonization, three are commonly reported as having been located the downtown Los Angeles area (in order of distance from the Project Site): Geveronga, Yaanga, and Maawnga. In addition to these pre-Spanish settlements, several so-called rancheria sites were established in the downtown area during the early to middle parts of the nineteenth century. The rancherias were occupied by Gabrielino as well as members of other tribes from the surrounding region and are discussed in further detail below. The map shown in Figure 6 shows the location of these rancheria sites, as well as various landmarks mentioned in the discussion of Yaanga.

Yaanga is commonly characterized as having been the most prominent of the pre-Spanish Gabrielino settlements within the Los Angeles Basin and has been the subject of more intensive study. By comparison, very little is known about Geveronga, which has also been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles. The estimated location for Geveronga is approximately 0.8 km (0.5 mile) north-northeast of the Project Site. The settlement is believed to have been situated west of Yaanga, but little else is known beyond the citations included in mission registers that describe its location as adjoining the Los Angeles Pueblo (McCawley 1996:57). A research program by Hackel et al. (2015) known as the Early California Cultural Atlas (ECCA) includes approximate locations for Native American settlements. Figure 6 shows the location for Geveronga given in the ECCA data plotted on a map with reconstructed topographic contours for the downtown Los Angeles area (Crandell 2010), which places the settlement in a drainage basin formed along the toeslopes of the Elysian Hills.

Alternative spellings and names for Yaanga include Yang-na, Yangna, and Yabit. Though the actual location is disputed, generally Yaanga is believed to have been located near present-day Union Station, approximately 1.9 km (1.2 mile) northeast of the Project Site (McCawley 1996:57; Morris et al. 2016). Historical records place Yaanga near Los Angeles's original plaza, near present-day Union Station (see Figure 6). Historians and archaeologists have presented multiple possible village locations in this general area; however, like the pueblo itself, it is likely that the village was relocated from time to time due to major shifts of the Los Angeles River during years of intense flooding. Dillon (1994) presented an exhaustive review of the potential locations, most within several blocks of the pueblo plaza. Johnston (1962:122) concluded that "in all probability *Yangna* lay scattered in a fairly wide zone along the whole arc [from the base of Fort Moore Hill to Union Station], and its bailiwick included as well seed-gathering grounds and oak groves where seasonal camps were set up."



Figure 5. Native American settlements, sites, and placenames. (Sources are cited in the footer.)

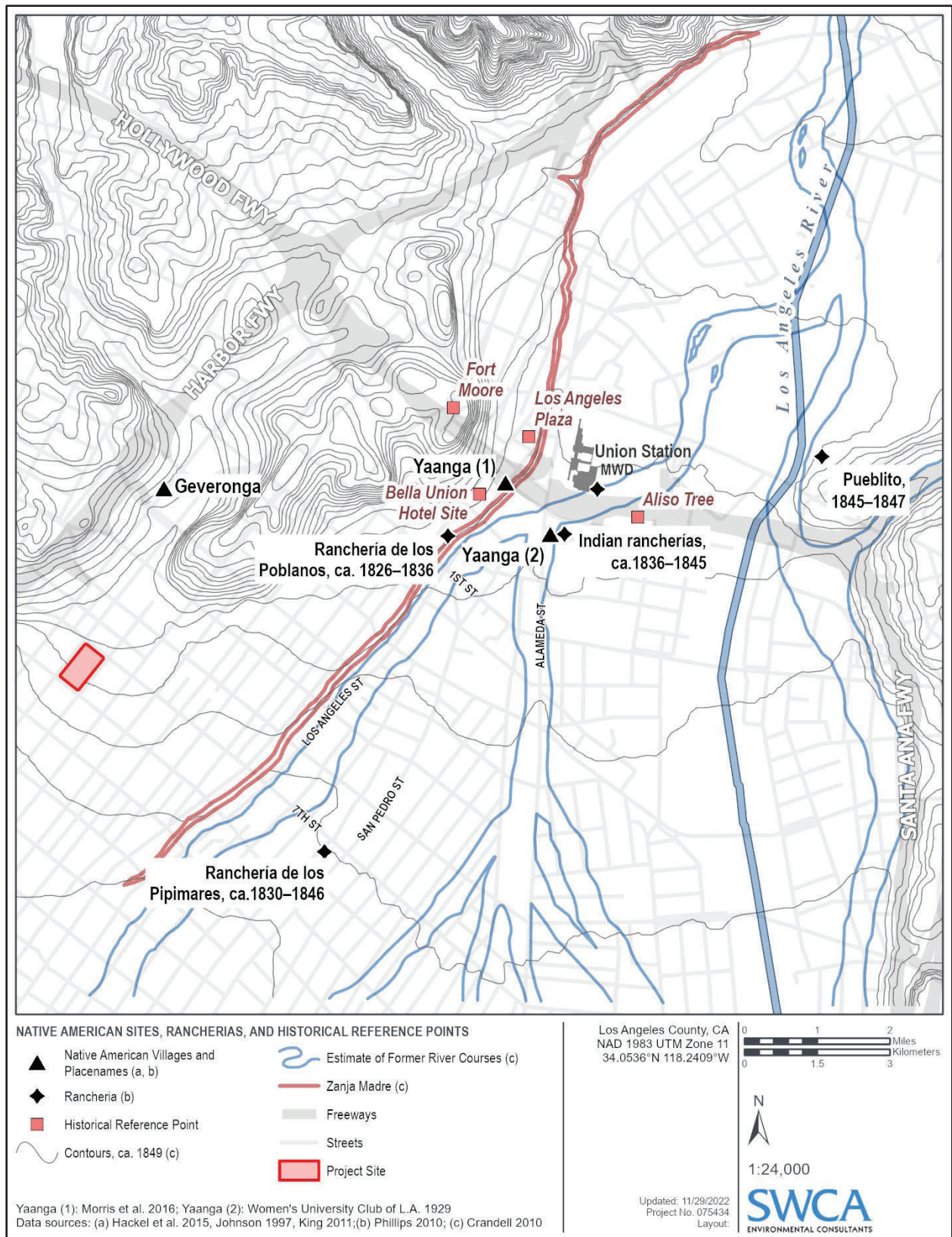


Figure 6. Native American communities and historical points of reference in the downtown area of Los Angeles. (Sources are cited in the footer.)

Locations proposed for Maawnga fall into two areas—one on the north-facing side of the Santa Monica Mountains and one within the foothills around what is now Griffith Park. J.P. Harrington’s historical informant reported that the settlement was located where the first Jewish cemetery was established (Johnston 1962:57). Citing research of Marco Hellman, Johnston (1962:57) places Maawnga within Elysian Park on Chavez Road at a police department pistol range (see also Dillon 1995:23). By this account, the village would have been located at least 6.8 km (4.2 miles) southeast of the Project Site (see Figure 6). Reid’s (1852:8) historical account describes the village site of Maawnga within the Rancho de los Felis (Rancho Los Feliz), which covers a 10-square-mile area in what is now portions of Hollywood, Los Feliz, Griffith Park, and Elysian Park. Hackel and colleagues use a location on the north-facing side of the Santa Monica Mountains for Maawnga’s potential location (Hackel et al. 2016).

Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence of the location of either village has been produced to date. Archaeological materials reportedly were unearthed during the construction of Union Station in 1939, and “considerably more” in 1970 during the rebuilding of the Bella Union Hotel on the 300 block of North Main Street, one mile northeast of the Project Site (Johnston 1962:121; Robinson 1979:12). The preponderance of available evidence indicates that there were one or more early Historic-period Native American communities west of the Los Angeles River near the original plaza site. This assumption is supported through several lines of ethnographic evidence, including the expedition journal of Friar Juan Crespi and engineer Miguel Costansó, both of whom were associated with the 1769 Portolá expedition. The notes from these sources indicate the village was located between 2.0 and 2.4 km (1.3 and 1.5 miles) west-southwest from the Los Angeles River on high-level ground. The Pueblo of Los Angeles was documented to have been founded directly adjacent to this village. The location of Yaanga was also referenced by long-time Los Angeles resident Narciso Botello and Gabrielino consultant José María Zalvidea, who indicated that Yaanga was originally located adjacent to the original site of the Los Angeles Plaza (Morris et al. 2016:112).

After the settlement of Los Angeles in 1781, Yaanga faced many new challenges because of its proximity to the new city. The last recorded birth at Yaanga is believed to have been in 1813, after which the village was forced to relocate south of the original site (Morris et al. 2016:97). This new village, known as *Ranchería de los Poblanos* by the Angelenos, is believed to have been located at the intersection of Los Angeles Street and 1st Street (Morris et al. 2016:96–97). This rancheria existed for approximately 10 years, between 1826 and 1836, after which the indigenous population was forced to relocate to a plot of land near Commercial and Alameda Streets (Morris et al. 2016). This rancheria existed for approximately another 10 years, between 1836 and 1845, during which nearby landowners attempted to forcibly relocate them to obtain more land for agricultural use. The City Council session on June 7, 1845, reports that the village be moved to the “height across the river, at the most convenient place, defining the most orderly location.” Ultimately, it required a special commission to prompt the move, which did not happen until December 22, 1845 (Phillips 2010:196). The new site was called “Pueblito,” but the location was only generally described as an area “across (east of) the river” or near the “Spring of the Abilas” or simply as “Boyle Heights” (Robinson 1938; Phillips 2010:196; Morris et al. 2016:97). Pueblito was razed in 1847, at which time legislation was passed to require the indigenous population to live in dispersed settlements or with their employers throughout the City.

There was another rancheria within the boundaries of Los Angeles during this time composed of Island Gabrielino—*Rancheria de los Pipimares*. The rancheria may have been in existence from as early as 1820 but ceased to exist after 1846 (Morris et al. 2016). Archival research identified the likely location of *Rancheria de los Pipimares* to be within the area of San Pedro and 7th Streets (Morris et al. 2016; see Figure 6), approximately 1.3 km (0.8 mile) southeast of the Project Site. Reports describe the Gabrielino at *Rancheria de los Pipimares* taking part in festivals and mourning ceremonies known as *kotuumot kehaay*, which were known to spread over large areas of land. This rancheria was likely a community of

Native Americans from San Nicolas Island, who are noted as having practiced the tradition of inhuming their dead, as opposed to the cremation practiced by mainland tribes. The ceremony reportedly predate the Mission period (1769–1834) by at least 2,000 years and were reportedly practiced in mid-nineteenth century Gabrieleno communities near the San Gabriel Mission, San Fernando, Piru, and Saticoy, and in neighboring Luiseño- and Cahuilla-speaking regions.

Directly east of San Pedro Street and south of 7th Street was the property of Jose Jacinto Reyes, godfather of more Island Gabrielino than anyone else in the city. The Reyes land was later passed on to Luis Lamoreau, who in 1846 filed two petitions to move the residents of Rancheria de los Pipimares to the “general village,” likely Pueblito (Morris et al. 2016:97). This increases the probability that the Rancheria de los Pipimares was indeed located along the west side of 7th Street.

Historical Development of the Project Area

The Project Site is located in the west-central portion of the city’s boundary when it was incorporated in 1849. In the first map of Los Angeles, surveyed by E.O.C Ord in 1849 (Ord 1849), the Project Site can be seen plotted in the southwestern portion of what was developed as the historic core surrounding the Church and Plaza. Ord’s map shows a trail trending approximately east-west from the historic core through the Project Site, following the natural contour at the footslope of the adjacent low-lying hills.

Development began in increase in the area in the latter half of the nineteenth century. With the completion of the railroad sparking what turned into a population boom in the 1880s, developments expanded from the historic core, especially to the west. Through the 1890s and into the early twentieth century, the City annexed new lands and the large lots originally surveyed in the 1850s were subdivided and developed into city blocks with residential buildings being erected west and south of the Project Site. While residential housing did increase, agricultural lands such as orchards, existed until the end of the nineteenth century. By 1921 the entire area was heavily developed as a residential neighborhood with some commercial properties such as garages and theaters in the vicinity, as well as some religious institutions.

The mid-twentieth century saw many changes within the vicinity of the Project Site and Los Angeles as a whole from growth in automobile sales and increases in business and commerce. The demise of the City’s public transportation system encouraged much of the movement of the largely white, middle class from the city center. During this time, much of downtown Los Angeles, including the Project Site, began transitioning into primarily commercial and business real estate. The construction of the Harbor Freeway in the early 1950s dramatically transformed the Project Site and surroundings as buildings were razed, streets realigned, and city blocks altered to accommodate its construction. This further shifted the character of the adjacent neighborhoods away from residential developments, even for multi-family properties, and towards more commercial uses. Developments continued around the Project Site through the remainder of the twentieth century, as fewer larger buildings and parking lots replaced the former buildings and resulted in the present-day appearance.

The Project Site is located in Block 29 of Hancock’s 1857 survey (Ord et al. 1857) and was one of the first 42 blocks delineated within the first map of Los Angeles. H. J. Stevenson’s (1884) Map of the City of Los Angeles depicts the southern half of the Project Site as developed and subdivided and William Hall’s (1888) study of California depicts the Project Site as a block east of the junction of Zanja No. 8R and Zanja No. 8R West Branch; and Nichols Ditch is situated approximately 0.25 mile to the northwest. Historical topographic maps and aerial photographs show that the Project Site is developed with within the southern half of the block along South Flower Street, all of West 8th Street, and all of South Hope Street on an 1894 historic topographic map.

By 1921, the remaining frontage of South Flower Street and West 7th Street are developed. A Baist’s Real Estate map from 1921 depicts at least four hotels, flats, and a church within the Project Site with the

most prominent feature being a YMCA Building. The entirety of the Project Site appears to be made up of commercial properties by 1927. By 1940, the southern portion of the Project Site shows surface parking areas and by 1960, additional surface storage areas appear along South Flower Street and are possibly shipping containers in place of some of the previous commercial buildings and parking areas. A 1968 aerial depicts those additional buildings were removed and additional storage/parking is visible along most of West 7th Street. The YMCA Building is the most prominent building still standing and several smaller buildings are visible in the southern portion of the Project Site. By 1973, the present-day buildings are all present within the Project Site.

RECORDS SEARCH

SWCA received the results of the CHRIS records search from the SCCIC on October 27, 2022. The records search focused on a 0.8-km (0.5-mile) radius surrounding the Project Site and was limited to a search of archaeological resources and studies, although some non-archaeological studies are included in the results because of the nature of the coding. The SCCIC’s CHRIS search results letter is included here in Attachment A but the results map showing the confidential archaeological site locations will be excluded from publicly circulated drafts of this report.

Using archival materials from the CHRIS already on-file, SWCA supplemented the SCCIC’s results with additional information on archaeological sites with Native American components that have been identified in the downtown Los Angeles area and outside of the 0.5-mile radius. Generalized descriptions of these resources is included below.

Previously Conducted Studies

Results of the records search indicate that 72 cultural resources studies have been conducted within 0.8 km (0.5 mile) of the Project Site, of which two are mapped as overlapping the Project Site (Table 2). Of the two previous cultural resources studies with intersecting study areas, the first is a 1993 report by Greenwood & Associates summarizing the results of monitoring during construction for a segment of Metro’s Red Line (LA-03103). The rail line runs below ground along 7th Street and is not directly within the Project Site. Nevertheless, no monitoring discoveries were reported for locations near the Project Site. The second study is a letter initiating consultation for a streetcar service project (LA-12584) and contains no analysis or information on known resources. The list of studies conducted outside of the Project Site includes 33 that included archaeological assessments, 14 literature searches, 10 architectural history studies, four management/planning studies, three monitoring studies, five labeled as “other”, and one evaluation.

Table 2. Prior Cultural Resources Studies within a 0.8-km (0.5-mile) Radius of the Project Site

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-00483	<i>Archaeological Resources Survey the Proposed Downtown People Mover Project Corridor Area</i>	Greenwood, Roberta S. (Greenwood and Associates)	1978	Literature Search	Outside
LA-01578	<i>Technical Report Archaeological Resources Los Angeles Rapid Rail Transit Project Draft Environmental Impact Statement and Environmental Impact Report</i>	Anonymous (Westec Services, Inc.)	1983	Archaeological, Field Study	Outside
LA-01642	<i>Los Angeles Downtown People Mover Program Archaeological Resources Survey: Phase II Evaluation of Significance and Recommendations for Future Actions</i>	Costello, Julia G. (Science Applications Inc.)	1980	Literature Search	Outside

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-01643	<i>Los Angeles Downtown People Mover Program Archaeological Resources Survey Phase 3</i>	Costello, Julia G.	1981	Archaeological, Field Study	Outside
LA-01741	<i>Archaeological and Paleontological Reconnaissance and Impact Evaluation of the Central City West Study Area Los Angeles, California</i>	Dillon, Brian D.	1989	Archaeological, Field Study	Outside
LA-02768	<i>Draft Environmental Impact Report Central City West Specific Plan</i>	Dillon, Brian D. and Roy Sails	1989	Management-Planning	Outside
LA-03103	<i>Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1</i>	Greenwood, Roberta S.	1993	Monitoring	Within
LA-03496	<i>Draft Environmental Impact Report Transit Corridor Specific Plan Park Mile Specific Plan Amendments</i>	Anonymous	n.d.	Management-Planning	Outside
LA-04214	<i>Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R106, Near West Fourth Street and South Hill Street, City and County of Los Angeles</i>	Conkling, Steven W. (LSA Associates, Inc.)	1998	Monitoring	Outside
LA-04215	<i>Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R104, Near West Third Street and South Grand Avenue, City and County of Los Angeles</i>	Conkling, Steven W. (LSA Associates, Inc.)	1998	Monitoring	Outside
LA-04467	<i>Architectural and Historical Review of Broadway Seismic List and National Register Theatrical and Commercial District</i>	Hatheway, Roger G. and Richard Starzak (Roger G. Hatheway & Associates)	1983	Architectural-Historical, Evaluation, Other Research	Outside
LA-04559	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 625-07, in the County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature Search	Outside
LA-04576	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 574-01, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature Search	Outside
LA-04577	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 575-01, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature Search	Outside
LA-04834	<i>Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties</i>	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Archaeological, Field Study	Outside
LA-04835	<i>Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties</i>	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Archaeological, Field Study	Outside
LA-04836	<i>Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project</i>	Anonymous (Science Applications International Corporation)	2000	Archaeological, Field Study	Outside
LA-04901	<i>Cultural Resource Assessment for AT&T Wireless Services Facility Number, R281.1, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	2000	Evaluation	Outside
LA-05077	<i>Cultural Resource Assessment for Sprint Pcs Facility La35xc768c (Desmond Building), Located in the County of Los Angeles, Ca</i>	Duke, Curt (LSA Associates, Inc.)	2000	Other Research	Outside

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-05080	<i>Cultural Resource Assessment for Modifications to Pacific Bell Wireless Facility La 574-01, County of Los Angeles, Ca</i>	Lapin, Philippe (LSA Associates, Inc.)	2000	Literature Search	Outside
LA-05093	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 679-11, County of Los Angeles, Ca</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature Search	Outside
LA-05098	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 226-01, County of Los Angeles, Ca</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature Search	Outside
LA-05181	<i>Cultural Resource Assessment for AT&T Wireless Services Facility T998, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	2000	Archaeological, Other Research	Outside
LA-05444	<i>Negative Archaeological Survey Report:07-la-110-20.0/22.1-07-173-1y2901</i>	Iverson, Gary (Caltrans District 7)	2000	Archaeological, Field Study	Outside
LA-06394	<i>California Theater, Historic Structures Report</i>	Milosfsky, Michali (Milofsky and Michali Architects)	1990	Architectural-Historical	Outside
LA-06396	<i>An Archaeological Assessment of the Proposed Verizon Wireless Grand Avenue, East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles County, California 90071</i>	Anonymous (Tetra Tech, Inc.)	2001	Literature Search	Outside
LA-06398	<i>Historic Study Report for the Proposed Gratts New Primary Center</i>	Anonymous (Jones & Stokes Associates, Inc.)	2001	Archaeological, Field Study	Outside
LA-06413	<i>Cultural Resource Assessment Cingular Wireless Facility No. SM 104-01, Los Angeles County, California</i>	Duke, Curt (LSA Associates, Inc.)	2001	Literature Search	Outside
LA-06415	<i>Cultural Resource Assessment Cingular Wireless Facility No. SM 104-04</i>	Duke, Curt (LSA Associates, Inc.)	2001	Literature Search	Outside
LA-06424	<i>Cultural Resource Assessment Cingular Wireless Facility No. SM 140-01 Los Angeles County, California</i>	Duke, Curt (LSA Associates, Inc.)	2002	Literature Search	Outside
LA-06435	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La679-11, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	1999	Architectural-Historical, Evaluation	Outside
LA-06440	<i>Proposed Verizon Wireless Facility: Pershing Square (99800089) in the City and County of Los Angeles, California</i>	Mason, Roger D. (Chambers Group, Inc.)	2001	Literature Search	Outside
LA-06446	<i>Proposed AT&T Wireless Services Facility: 7th Hill (r282) in the City of Los Angeles, Los Angeles County, California</i>	Mason, Roger D. (Chambers Group, Inc.)	2000	Literature Search	Outside
LA-06449	<i>Cultural Resources Survey Report for an AT&T Wireless Services Telecommunications Facility: Cell Site 7th Hill (r282) in the City of Los Angeles, Los Angeles County, California Section 106 Historic 701 S. Hill Street Los Angeles</i>	Bonner, Wayne H. (Chambers Group, Inc.)	2002	Architectural-Historical, Evaluation, Literature Search	Outside
LA-06460	<i>Cultural Resource Assessment Cingular Wireless Facility No. Sm204-02, Los Angeles County, California</i>	Duke, Curt and Judith Marvin (LSA Associates, Inc.)	2002	Archaeological, Architectural-Historical, Evaluation, Field Study	Outside

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-06463	<i>A Section 106 Historic Preservation Review of the Proposed Verizon Wireless Grand Avenue East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles, Ca 90071</i>	Anonymous (Tetra Tech, Inc.)	2002	Archaeological, Evaluation, Field Study	Outside
LA-06920	<i>Cultural Resource Assessment Cingular Wireless Facility No. SM 104-08 City and County of Los Angeles, California</i>	Duke, Curt and Judith Marvin (LSA Associates, Inc.)	2003	Archaeological, Evaluation, Field Study	Outside
LA-07527	<i>Caltrans Statewide Historic Bridge Inventory Update Tunnels</i>	Feldman, Jessica B., Lemon, David, and Hope, Andrew (Myra L. Frank & Associates, Inc. and California Department of Transportation)	2006	Architectural-Historical, Evaluation	Outside
LA-07733	<i>Cultural Resources Records Search Results and Site Visit for Cingular Wireless Candidate LSA0739 (811 Wilshire), 811 Wilshire Boulevard, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2006	Archaeological, Field Study, Other Research	Outside
LA-07733	<i>Direct APE Historic Architectural Assessment for Cingular wireless Candidate LSA0739 (811 Wilshire), 811 Wilshire Boulevard, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. and Crawford, Kathleen A. (Michael Brandman Associates)	2006	Architectural-Historical	Outside
LA-07774	<i>Cultural Resources Records Search Results and Site Visit for Cingular Wireless EI-038-01 (SBC Switch-downtown LA), 433 South Olive Street & 434 Grand Avenue (aka 420 South Grand Avenue), Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2005	Archaeological, Field Study	Outside
LA-07980	<i>Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate La0155a (433 S. Olive Street: AT&T Switch), 433 South Olive Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2006	Archaeological, Evaluation, Field Study	Outside
LA-08013	<i>Cultural Resources Investigations for the Proposed City House Los Angeles (LLC), and the Olympic on Grand (LLC) Properties in the City of Los Angeles, Los Angeles County, California</i>	McKenna, Jeanette A.	2006	Archaeological, Architectural-Historical, Evaluation, Field Study	Outside
LA-08026	<i>Treatment Plan for Potential Cultural Resources Within Proposed Metro Rail Subway Station Locations in Metropolitan Los Angeles, California</i>	Carrico, Richard L. (Westec Services, Inc.)	1985	Management-Planning, Other Research	Outside
LA-08754	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate La03104k (California Jewelry), 607 South Hill Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. and Kathleen A. Crawford (Michael Brandman Associates)	2007	Archaeological, Field Study	Outside
LA-09331	<i>Photo Documentation 1016 and 1026 Eighth Place Los Angeles, California</i>	Anonymous (PCR Services Corp.)	1999	Architectural-Historical	Outside
LA-09539	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11003K (Telacu Plaza), 1033 South Hope Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2008	Archaeological, Field Study	Outside
LA-09809	<i>Cultural Resources Study of the LA Self Storage Project, Royal Street Communications Site No. LA3833A, 1000 W. 6th Street, Los Angeles, CA</i>	Dana E. Supernowicz (Historic Resource Associates)	2009	Archaeological, Field Study	Outside

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-10290	<i>Cultural Resources Records Search and Site Visit Results for Clearwire Candidate CA-LOS6191A/CA6538 (Bonaventure), West 6th Street, Los Angeles, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2009	Archaeological, Field Study, Other Research	Outside
LA-10507	<i>Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report</i>	Anonymous (Westec Services, Inc.)	1983	Archaeological, Evaluation, Field Study, Other Research	Outside
LA-10542	<i>Historical Architectural Survey and Evaluation Report and Finding of no Adverse Effect</i>	Grimes, Teresa (Historic Resources Group)	1998	Other Research	Outside
LA-10772	<i>Historic Building Survey - Los Angeles Downtown People Mover Program Report for Determination of Eligibility</i>	Hatheway, Roger (Myra L. Frank & Associates, Inc.)	1979	Architectural-Historical, Evaluation	Outside
LA-10816	<i>Archaeological Survey Report for the YWCA Job Corps Urban Campus Project 1016-1038 Olive Avenue, Los Angeles, California</i>	Robinson, Mark C. (Jones & Stokes Associates, Inc.)	2006	Archaeological, Field Study	Outside
LA-10860	<i>Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan</i>	Robinson, Mark (Jones & Stokes Associates, Inc.)	2007	Monitoring	Outside
LA-10981	<i>Verizon Cellular Communications Tower Site - AEG Petroleum Building, 714 West Olympic Boulevard, Los Angeles, CA 90015 - Results of Architectural History Survey for Verizon Cellular Communications Tower Site</i>	Hatoff, Brian (URS)	2010	Other Research	Outside
LA-10982	<i>Verizon Cellular Communications Tower Site - ABM Industries IBR, 1150 South Olive Street, Los Angeles, CA 90015</i>	Hatoff, Brian (URS)	2010	Other Research	Outside
LA-11649	<i>Evaluation of Proposed Demolition of Stationers Building, 525 South Spring Street, Stationers Annex, 523 South Spring Street on the Spring Street Financial Historic District</i>	Kaplan, David and O'Connor, Pam (Kaplan Chen Kaplan)	2004	Architectural-Historical, Evaluation	Outside
LA-11679	<i>Cultural Resource Records Search and Site Survey, AT&T Site LAC301, Downtown: 404 1/2 West 7th Street, Los Angeles, Los Angeles County, California 90014</i>	Loftus, Shannon (ACE Environmental)	2011	Archaeological, Field Study, Other Research	Outside
LA-11710	<i>Regional Connector Transit Corridor Draft Environmental Impact Statement/ Draft Environmental Impact Report, Appendix Y Cultural Resources-Archaeology</i>	Anonymous (CDM and SWCA)	2011	Management-Planning	Outside
LA-12045	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02204A (SM204 816 South Grand), 816 South Grand Avenue, #818 Los Angeles, Los Angeles County, California</i>	Bonner, Wayne (Michael Brandman Associates)	2012	Archaeological, Field Study	Outside
LA-12171	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA03104K (California Jewelry Exchange) 607 South Hill Street, Los Angeles, California</i>	Bonner, Wayne and Crawford, Kathleen (Michael Brandman Associates)	2012	Archaeological, Field Study	Outside
LA-12177	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11003K (Telacu Square) 1033 South Hope Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne and Crawford, Kathleen (Michael Brandman Associates)	2012	Archaeological, Field Study	Outside

Report No.	Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-12392	<i>Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate EL0038 (SBC Building), 433 Olive Street and 434 South Grand Avenue, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne (EAS)	2013	Archaeological, Field Study	Outside
LA-12393	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02731A (LA424-AT&T (Madison MSC), 633 South Olive Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne and Crawford, Kathleen (EAS)	2013	Archaeological, Architectural-Historical, Evaluation, Field Study	Outside
LA-12493	<i>Cultural Resource Assessment Verizon Wireless Services Grand Avenue ELA Facility City of Los Angeles, Los Angeles County, California</i>	Fulton, Phil and McLean, Roderic (LSA Associates, Inc.)	2012	Archaeological, Field Study	Outside
LA-12584	<i>Restoration of Historic Streetcar Service in Downtown Los Angeles</i>	Rogers, Leslie (Federal Transit Administration)	2013	Archaeological, Architectural-Historical	Within
LA-12965	<i>Submission Packet, FCC Form 621, for proposed Collocation Project, 808 South Flower Street, Los Angeles, Los Angeles County, California 90017 DLA104, EBI Project Number: 6115005143</i>	Green, Alexis (EBI Consulting)	2016	Archaeological, Architectural-Historical, Field Study	Outside
LA-13105	<i>Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LA0741/CLU5712 (LA Self Storage), 1000 6th Street, Los Angeles, Los Angeles County, California. CASPR No. 3551656508</i>	Bonner, Diane F., Carrie D. Wills, and Kathleen A. Crawford (Environmental Assessment Specialists, Inc)	2014	Archaeological, Architectural-Historical, Field Study	Outside
LA-13141	<i>Cultural Resources Assessment of the Pershing Square Project, Los Angeles, Los Angeles County, California (BCR Consulting Project No. TRF1412)</i>	Brunzell, David (BCR Consulting LLC)	2014	Archaeological, Field Study	Outside
LA-13143	<i>Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAR091 (Figueroa and 5th Street), 545 South Figueroa Street, Los Angeles, Los Angeles County, California. CASPR :F# 3551015017</i>	Bonner, Wayne H. and Kathleen A. Crawford (Environmental Assessment Specialists, Inc)	2013	Archaeological, Architectural-Historical, Field Study	Outside
LA-13143	<i>Direct APE Historic Architectural Assessment for ABeT Mobility, LLC Candidate LAR091 (Figueroa and 5th St), 545 Figueroa Street, Los Angeles, Los Angeles County, California, CASPR No. 3551015017</i>	Bonner, Wayne H. and Kathleen A. Crawford (Environmental Assessment Specialists, Inc)	2013	Architectural-Historical, Evaluation	Outside
LA-13239	<i>Extent of Zanja Madre</i>	Gust, Sherri (Cogstone)	2017	Other (Mapping Only)	Outside

Previously Recorded Cultural Resources

The CHRIS records search identified one archaeological site in the database: P-19-004903/LAN-4903H (hereafter LAN-4903H). The site is listed as a historic-in-age structure, object, and site recorded in 2013 north of 5th Street between Olive and Hill Streets, approximately 500 m (1,640 feet) northeast of the Project Site. The site did not include any Native American objects, artifacts, or features.

NATIVE AMERICAN ARCHAEOLOGICAL SITES IN DOWNTOWN LOS ANGELES

SWCA's supplemental research identified three archaeological sites that have been recorded in the downtown Los Angeles area and include LAN-7/H, LAN-1575/H, and LAN-4662. All of the sites are located in vicinity of Union Station and the Los Angeles Plaza (see Figure 6).

LAN-7/H is an archaeological site that primarily contained historic period deposits but also contained two pieces of ground stone and a brown mission ware (Tezon) ceramic sherd, which are typically associated with Native American activities. The site was initially recorded by Meighan in 1951 and updated by Huey and Romani in 1980. The historic component includes artifacts dating from 1860 to 1880s that are associated with Los Angeles's earliest Chinatown. The site is located west of Union Station and across Alameda Street and was discovered when the area was bulldozed for construction of the Santa Ana Freeway. The only mention of depth in the site records states that the depth of midden is approximately 60 cm below the surface.

Site LAN-1575/H is a multi-component resource identified at the present-day location of Union Station. The site included extensive historical features of ca. 1860 to 1930s Chinatown including privies, wells, and architectural remains, as well as a prehistoric Native American cemetery with several primary and secondary internments and numerous features, artifacts, and cultural items. The Native American archaeological component along with some other Native American sites nearby are considered potential remnants of the Gabrielino village of Yaanga. Native American deposits were identified below, but also partially intermixed with, a stratum of historic period sediments, both of which were underneath a surface stratum of construction fill (Goldberg et al. 1999:32). The resource was initially identified in 1989 during monitoring of the construction for the Metro-Rail Subway and was then updated twice during Phase I and monitoring projects, with the most recent site update in 2015. Cultural material was observed down to 12 feet below the surface.

Goldberg et al. (1999) summarized the results of archaeological data recovery conducted in 1996 by Applied Earthworks for the Metropolitan Water District (MWD) Headquarters Facility Project. The report describes Native American deposits identified below, but also partially intermixed with, a stratum of historic period sediments, of which both were identified underneath a surface stratum of construction fill (Goldberg et al. 1999:32). The data obtained from P-19-001575/H clearly demonstrate the potential for significant Native American archaeological resources to be preserved beneath historic period deposits, which, in turn, can be preserved underneath asphalt and modern construction debris in a fully urbanized setting. The report documents archaeological remains preserved as far below the modern grade as 3.0 m (9.8 feet). The material was discovered within lenses of alluvial sediments deposited during floods within the Los Angeles River floodplain.

In 2019 during construction of Metro's Patsaouras Bus Plaza Station, 13 archaeological features were identified, including Native American human remains and artifacts, as well as historic period deposits (i.e., not affiliated with Native Americans). This new component included materials consistent with the types and ages identified in LAN-1575/H. Some of these new discoveries were identified within the boundary designated for LAN-1575/H, but the majority extend east along Highway 101 and Interstate 10. The new component was identified during mechanical excavation of areas understood to have been extensively disturbed by the Southern California Gas Company's Manufactured Gas Plant, Highway 101, El Monte Busway Bridge, the Metro Red Line, and Patsaouras Plaza, among other developments. Full details and archaeological reporting for this discovery were not available at the time of this study, and the information regarding the contents and location of the discovery were based on publicly available information included in Metro's 2019 board reports (File #2019-0195).

LAN-4662 consists of a single bone from a Native American individual identified east of Union Station and below the southbound lane of the 900 block of Vignes Street. The resource was identified by AECOM in 2013. The bone is the shaft of a right femur with both epiphyses broken off and is highly permineralized. The femur was encountered during construction activities at a depth of 19 feet below the present street surface, within poorly sorted alluvial deposits, and the surrounding matrix is described as “concretized.” The site form postulates that the bone was deposited by the Los Angeles River, and radiocarbon dating yielded a calibrated date of 3640 to 3560 years cal B.P., which places it within the middle Holocene period. Archaeological testing did not reveal any further remains.

SACRED LANDS FILE SEARCH

The Native American Heritage Commission (NAHC) is charged with identifying, cataloging, and protecting Native American cultural resources, which includes ancient places of special religious or social significance to Native Americans, and known ancient graves and cemeteries of Native Americans on private and public lands in California. The NAHC’s inventory of these resources is known as the Sacred Lands File (SLF). In addition, the NAHC maintains a list of tribal contacts affiliated with various geographic regions of California. The contents of the SLF are strictly confidential, and SLF search requests return positive or negative results in addition to a list of tribal contacts with affiliation to the specified location.

On September 12, 2022, the NAHC submitted the results of an SLF search in response to SWCA’s request and is included here in Attachment B. The results of the SLF were negative. In the response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of tribal cultural resources within the Project Site, and that the CHRIS and SLF are not exhaustive. The NAHC’s response to SWCA’s request included a list of ten Native American contacts who may have knowledge of cultural resources in or near the study area and recommended they be contacted prior to work. The ten contacts listed on NAHC’s contact list included seven contacts who are also listed on the City’s AB 52 Notification List, which lists all tribes who have previously requested the City notify them of any projects in the City pursuant to AB 52 (see *Tribal Consultation* section below). Christina Conley of the Gabrielino Tongva Indians of California Tribal Council and Joseph Ontiveros of the Soboba Band of Luiseño Indians were on the NAHC’s contact list and were not sent individualized notification letters during the City’s consultation process, but other contacts from each their respective tribal organizations who were on the City’s AB 52 Contact List received notification letters. Lovina Redner, Tribal Chair of the Santa Rosa Band of Cahuilla Indians is the only individual on the NAHC’s contact list whose tribal organization who did not receive a notification letter.

TRIBAL CONSULTATION

Pursuant to PRC Section 21080.3.1, the City sent notification letters on August 4, 2022 to all ten California Native American Tribal Contacts listed on the City’s AB 52 Notification List (Table 3). The letters described the proposed Project and asked for a written reply if consultation was requested.

Table 3. California Native American Tribes Who Received Project Notifications Pursuant to PRC Section 21080.3.1

Name, Title	Affiliation
Rudy Ortega, Tribal President	Fernadeño Tataviam Band of Mission Indians
Jairo Avila, Tribal Historic and Cultural Preservation	Fernadeño Tataviam Band of Mission Indians
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians-Kizh Nation

Name, Title	Affiliation
Anthony Morales, Chairperson	Gabrieleno/Tongva San Gabriel Band of Mission Indians
Sandonne Goad, Chairperson	Gabrieleno/Tongva Nation
Robert F. Dorame, Chairperson	Gabrieleno/Tongva Indians of California Tribal Council
Charles Alvarez	Gabrielino-Tongva Tribe
Donna Yocum, Chairperson	San Fernando Band of Mission Indians
Isaiah Vivanco, Chairperson	Soboba Band of Luiseño Indians
Thomas Tortez, Chairperson	Torres Martinez Desert Cahuilla Indians

As of the date of this report, one response has been received requesting consultation. Chairman Andrew Salas of the Gabrieleño Band of Mission Indians-Kizh Nation requested consultation with City Planning. At the request of Chairman Salas, the consultation took place exclusively through written correspondence.

In his email reply on December 7, 2022, Chairman Salas provided a letter (Exhibit 1 of Attachment C) detailing the Gabrieleño Band of Mission Indians-Kizh Nation’s concerns regarding the proposed Project as it related to the discovery of potential on-site tribal cultural resources. Chairman Salas included five attachments to the letter (Exhibits 2 – 6 of Attachment C) consisting of three maps and two pages excerpted from a book. The attached letter (Exhibit 1 of Attachment C) includes interpretive information associated with the other attachments, portions of regulations related to tribal consultation and tribal cultural resources, a request for information about the existing Project Site soils, and some initial information about how soils data are typically interpreted in terms of the presence or absence of a tribal cultural resource. In a follow up email to City Planning, Chairman Salas provided three proposed mitigation measures requiring a Native American monitor to be present during ground disturbing activities and specific steps to be followed as treatment for the discovery of human remains and/or associated funerary objects affiliated with Native Americans (Exhibit 7 of Attachment C).

The attachments submitted during consultation include three maps (Exhibits 2–4 of Attachment C) and two text excerpts (Exhibits 5 and 6 of Attachment C) that are all from previously published sources. PRC Section 20182.3(c)(2) allows for disclosure of information already publicly available. However, because Chairman Salas requested that all information be considered confidential, for purposes of this analysis and in the context of the tribal consultation for this Project, these sources are treated as part of the confidential record in Attachment C, which is a fully confidential portion of this memorandum, and will not be included in any publicly circulated or publicly available documents.

SWCA reviewed the exhibits and correspondences between City Planning and the Gabrieleño Band of Mission Indians – Kizh Nation. As previously stated, the purpose of this review is to provide a factual basis on which the City can determine whether substantial information exists for a tribal cultural resource, and thereby inform the analysis of potential for impacts and, if necessary, ensure that appropriate means of mitigation and treatment have been requested by tribal parties or otherwise put forward.

Chairman Salas’ letter states that the Project has a potential to impact tribal cultural resources during subsurface activities because of high cultural sensitivity. The analysis included in Chairman Salas’s letter, which is also attached to the email, provides context for the map exhibits by relating geographic associations depicted in the map with specific elements of their tribal history, including but not limited to village locations, settlement patterns, common subsistence behaviors, ritual practices, and historical events. The information contained in the remaining exhibits to Chairman Salas’s letter cover a wide range of topics and subject matter. The exhibits composed of excerpts from various texts lacks any such explicit citation or context in the written correspondence, although there are some passages whose contents imply

relationships to some of the content referenced in the discussion of the maps, such as subsistence behaviors and village names and locations.

After considering all materials submitted by Chairman Salas to-date, SWCA finds that **there is not sufficient evidence for a known tribal cultural resource within the Project Site**. The information contained in the documents provided by Chairman Salas is limited to a regional focus—the Los Angeles Basin and traditional Gabrielino territory—and lacks adequate detail and analysis of the Project Site. The information on the Native American land-uses and traditional practices helps to convey that previously unidentified resources can occur essentially anywhere within the Los Angeles Basin; however, given the level of mechanical alterations that have occurred to sediments within the Project Site and the age of the naturally deposited sediments beneath the altered surface stratum, there is no evidence identified to-date suggesting there is an increased likelihood for such a resource to be preserved within the Project Site, at least to the degree that would warrant a tribal monitor to ensure any potentially significant impacts are avoided or reduced. Overall, SWCA finds that further evidence would be needed to link the contextual information submitted during the consultation with the existing conditions of the Project Site to substantiate the claim that a tribal cultural resource is present or highly likely to be preserved below the surface, such that the requested mitigation measures are necessary.

It should be noted that in the letter sent on December 7, 2022, Chairman Salas recognized that their interpretation of the tribal cultural resource sensitivity may be altered if there is information presented demonstrating that the soils within the Project Site have been removed and replaced. The information regarding the historical development of the Project Site, soils data from the geotechnical and paleontological reports, and this memorandum should be relayed to Gabrieleño Band of Mission Indians – Kizh Nation so that they can appropriately account for this information in their recommendations.

SENSITIVITY ASSESSMENT

Methods

This section assesses the potential (i.e., sensitivity) for tribal cultural resources that are archaeological in nature to be preserved below the surface of the Project Site. Although not all tribal cultural resources are archaeological in nature, those likely to be preserved below the surface are likely to fit the definition of an archaeological and tribal cultural resource. The location of buried archaeological deposits, including those that are potential tribal cultural resources, is unpredictable in nature; however, combining information from different sources can allow for a qualitative assessment of the likelihood for a buried tribal cultural resource to be present within a given area or Project Site. Accordingly, sensitivity assessments are qualitative or probabilistic in nature—ranging along a spectrum of increasing probability—which is designated as low, moderate, and high sensitivity. The sensitivity assessment essentially combines two variables: indications of intensive use and preservation conditions. Areas with a favorable setting for habitation or use, soil conditions capable of preserving buried material, and little to no disturbances are considered to have a high sensitivity. Areas lacking these traits are considered to have low sensitivity. Areas with a combination of these traits are generally considered to have moderate sensitivity.

The first variable considered in SWCA’s sensitivity assessment concerns the link between human behavior and material remains, i.e., whether there are any indications that a given area was the focus of past use by Native Americans such that any material remains, or physical evidence associated with those activities will have resulted. Questions asked include, what was the environmental setting within the time period of human occupation in southern California (approximately the last 13,000 years)? Was the location favorable for habitation or other types of activities in this time span based on what we about past Native American lifeways?

The next consideration given is whether the setting of a given Project Site is conducive to the preservation of any such material remains that may have once been present. Assessing the preservation conditions considers the following types of questions. Is there a potential for shallow or deeply buried deposits? What kinds of land uses have occurred within region and have there been any alterations to the physical setting within the Project Site? What is the age of the sediments, and is there evidence of high or low energy deposition or erosion during the period of human occupation? Did the physical alterations result from natural causes, such as flooding or erosion, or from more recent historic-period developments, such as mechanical grading, and how have these processes influenced the potential for preserving buried materials? In other words, is there evidence that natural or historic-period developments may have eroded, displaced, or otherwise destroyed any potential materials that may have once been present?

To assess these variables, SWCA considers archaeological, ethnographic, historical, environmental, and other archival data sources. These sources are reviewed to determine whether the general location is described in ethnographic studies and oral histories, and whether the area of interest is similar to the physical setting in which other Native American archaeological sites have been identified. Where the sensitivity assessment considers proximity to a given feature—a known archaeological site, a former village, settlement, or placename, or an environmental feature—there is no universal measure between sensitivity and distance, nor is there a consistent depth above or below which buried resources can occur in all circumstances. These variables are assessed on a case-by-case basis and the conclusions incorporate a degree of professional judgment based on industry standards and best practices for archaeology.

Archaeological site data include those identified in the CHRIS records search and supplemental background research. The CHRIS data are also analyzed in greater detail to identify any sample bias in the identification of sites, which is to say, to what degree the absence of site information is the result of no resources having been identified or that no archaeological investigation took place. In addition to the literature sources cited above and listed in the references section below, SWCA consulted the following publicly accessible data sources: David Rumsey Historical Map Collection; Huntington Library Digital Archives; Library of Congress; Los Angeles Public Library Map Collection; USGS historical topographic maps; and University of California, Santa Barbara, Digital Library (aerial photographs). Historical maps drawn to scale are georeferenced using ESRI ArcGIS software suite to show precise relationships to the Project Site.

Results

The CHRIS and SLF searches were negative for tribal cultural resources or potential tribal cultural resources within the Project Site or a 0.5-mile radius. SWCA conducted supplemental background research focusing on Native American land uses and settlement patterns in the region, and the effects of ranching and urban development. Several Native American sites were identified in the Project vicinity, the closest of which are Geveronga and Yaanga, which have been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles, but its location can only be inferred from ethnographic information.

The Gabrielino settlement known as Yaanga is estimated to have been located in the area between the Los Angeles Plaza and present-day Union Station, approximately 1.9 km (1.2 mile) northeast of the Project Site. Far less is known about another nearby settlement known as Geveronga, which is estimated to have been located somewhere west of Yaanga. The best estimates of its former location place it in a drainage basin formed along the toeslopes of the Elysian Hills, approximately 0.8 km (0.5 mile) north-northeast of the Project Site. Collectively, these former Native American settlements are considered by SWCA to have been located too far from the Project Site such that a buried tribal cultural resource directly associated with their occupation is likely to be located within the Project Site. Rather, the presence of pre-Spanish period settlements suggests certain locations of what is now downtown Los Angeles were indeed

important locations for past Native American communities, and there was some degree of increased activity focused here, but within a broad and more generalized area. Accordingly, the influence on sensitivity for a buried tribal cultural resource is considered to be similarly generalized across the downtown Los Angeles area, with only a minor influence on the comparatively smaller Project Site. This more generalized sensitivity would include any material remains associated with traditional Native American lifeways that includes foraging, food processing and cooking, resource gathering, rituals, inhuming the deceased, established temporary open camps and seasonal settlements. Archaeological remains from these types of activities are commonly identified by the presence of objects such as tools or the debris left by their manufacture, plant and animal remains, hearths, and items of adornment or sacred objects.

The Project Site is west of the Los Angeles River, currently located approximately 2.6 km (1.6 miles) east of the Project Site, though within the river's historical floodplain. Shifts in the main channel of the Los Angeles River have occurred numerous times in recorded history, including two significant shifts in 1815 and 1825, the former of which realigned the channel to the approximate location of the Project Site. The general proximity of the Project Site to areas of known habitation, the river, and broad travel corridors has the effect of an overall increase in the sensitivity for unknown tribal cultural resources, at least higher than low background levels, particularly for the archaeological remains of temporary open camps. Such camps are typically identified by the presence of hearth features, ground stone and other types of artifact assemblages. However, additional factors related to preservation of such materials are considered with respect to alluvial depositional settings within the Los Angeles River floodplain and are discussed below.

The Project Site is situated northwest of the reported location of *Rancheria de los Pipimares*—a village site occupied by Gabrielino from San Nicolas Island (known as *Nicoleño*) during the early and middle parts of the nineteenth century. *Rancheria de los Pipimares* is estimated to have been between 7th and 8th Streets, west of San Pedro Street, which is approximately 1.3 km (0.8 mile) southeast of the Project Site. Other nearby rancherias occupied during the Historic period by Gabrielino and other Native Americans include *Rancheria de los Poblanos*, one unnamed settlement, and *Pueblito* (on the east side of the Los Angeles River). Because the location of the Historic period rancherias can be traced to streets and City blocks included in the contemporary street grid, and the activities associated within those settlements are believed to have been more geographically constrained, the influence on tribal cultural resource sensitivity is similarly confined to smaller areas, with little to no influence on the sensitivity within the Project Site.

The Project Site is on the south-western portion of the City's original 1849 annexation boundary. Maps and historical accounts characterize the Project Site and surroundings as open fields used for livestock grazing and growing corn. The first development identified within the Project Site are single-family residences, present by 1894. The Project Site was subject to re-development during the 1920s during which time several Historic-period buildings were constructed and demolished. These construction-demolition episodes have compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been deposited on the surface or shallowly buried.

It has been demonstrated elsewhere in the downtown portion of Los Angeles that deeply buried archaeological deposits can exist within alluvium below Historic-period disturbances and may also be intermixed with Historic-period debris. Alluvial deposits within the Los Angeles Basin can be massive, extending hundreds of feet below the surface, and may contain sediments deposited before human occupation of North America. Furthermore, most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, while low-energy floods tend to produce more favorable environments for the preservation of cultural materials. Thus, low-energy alluvial sediments dating to the late Pleistocene or Holocene time-periods have the greatest potential for

preserving tribal cultural resources. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered. Also, such soil conditions are an indicator of a setting favorable for preservation, but the presence of soils with these properties is not an absolute indicator of tribal cultural resource presence.

The Project Site is mapped within a geologic unit composed of alluvium deposited between the late Pleistocene and Holocene, which can be favorable for the preservation of a deeply buried tribal cultural resource. However, given the horizontal extent and depth of this geologic unit and those of similar composition and age within the Los Angeles Basin, SWCA does not consider the presence of these sediments alone to be sufficient evidence to suggest a strong influence on the tribal cultural resource sensitivity directly within the Project Site. Rather, it demonstrates that there is at least a low level of potential for a deeply buried resource.

SWCA reviewed documents submitted by Gabrieleño Band of Mission Indians – Kizh Nation during consultation with the City pursuant to PRC Section 21082.3. No evidence was identified that was not otherwise considered in SWCA’s analysis regarding the existence of a known tribal cultural resource within the Project Site or the increased likelihood for an as-yet unidentified tribal cultural resources being preserved within the Project Site.

To summarize, Native American settlements and sites in the vicinity were identified through supplemental background research, and none are considered close enough to the Project Site to suggest a corresponding increase in sensitivity for material remains associated with the intensive use of those sites. Foraging and other cultural activities by Native Americans occurred throughout the Los Angeles Basin. Some of these activities could have produced material remains, some of which could be preserved as buried deposits, which forms a baseline level of sensitivity effectively across the entire Los Angeles Basin. While the potential for a buried tribal cultural resource cannot be fully ruled out, no substantial evidence was identified to suggest an increase in sensitivity for a tribal cultural resource within the Project Site. The effects of development within the Project Site do not fully eliminate the potential for deposits, but it is considered to have a net decrease in the potential sensitivity. Based on the above considerations, SWCA finds that **the sensitivity for tribal cultural resources at the Project Site is low.**

IMPACT ANALYSIS

PRC Section 21084.2 establishes that a project with an effect that may cause a substantial change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. The potential for impacts to tribal cultural resources by the proposed Project were analyzed based on the threshold questions provided in Appendix G of State CEQA Guidelines, Section XVIII, which states the following:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
- b. 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Tribal cultural resources include but are not limited to those that are archaeological in nature. In other words, an archaeological site may qualify under CEQA as a historical resource or a tribal cultural resource, or both. As such, there are shared considerations made when assessing if a given resource is a tribal cultural resource and a historical resource, particularly in terms of whether one of the four CRHR criteria are satisfied and determining whether the resource retains sufficient integrity to convey the significance under a given criterion. A tribal cultural resource may also be non-archaeological in nature, either in part or its entirety, and be characterized as another type of resource, such as a cultural landscape or sacred place.

Tribal Cultural Resources

Neither the searches of the CHRIS and SLF nor the literature review identified any known tribal cultural resources within the Project Site. SWCA's background research confirmed that Native American sites and placenames have been identified between 1.3 to 2.6 km (0.8 to 1.6 miles) from the Project Site, which is not within a reasonable proximity such that material components from any of these sites is likely to be preserved within the Project Site. SWCA assessed the potential for an as-yet unidentified tribal cultural resource that is archaeological in nature to be preserved as a buried deposit within the Project Site and found that the sensitivity to be low. The mechanical processes that have occurred during the twentieth century during the cycles of construction and demolition within the Project Site, which produced the fill soils, are not conducive to the preservation of Native American objects, sites, and features. The naturally deposited alluvial sediments beneath the fill also has a low probability of containing any physical evidence of past Native American activities.

The City received one request for consultation from the Gabrieleño Band of Mission Indians-Kizh Nation in response to the notification letters sent by City Planning pursuant to PRC Section 21080.3.1. The Gabrieleño Band of Mission Indians-Kizh Nation stated in their email correspondence that there is a high likelihood of a tribal cultural resource to occur given the subsurface because of the proximity to certain features of the natural landscape and historical transportation network. SWCA reviewed the results of consultation including all documentation provided by the Gabrieleño Band of Mission Indians-Kizh Nation and found insufficient evidence to indicate the presence of either a known or new tribal cultural resource within the Project Site.

The Project proposes to construct a new 53-story tower within a fully developed city block. The proposed development of a new tower will occur within the southern half of the Project Site within the footprint of the existing podium building and extending multiple stories above the existing podium, which will be expanded to 12 stories. The majority of Project activities involve above-grade construction. Ground disturbance associated with the Project will be limited to excavation for building foundations within the existing below-grade parking structure. In other words, the excavation is going to be contained within relatively limited selective areas as opposed to rough grading across the extent of the Project Site, and what excavation will occur is going to be initiated in sediments that are already below-grade and/or already subject to substantial alteration. Fill soils up to 8 feet were described across the Project Site and are likely underlaid by sediments that are too old to contain a tribal cultural resource. Given these observations, the fact that a tribal cultural resource has not been previously identified within the Project Site, and the evidence suggesting a low probability for a previously unidentified tribal cultural resource being discovered within the Project Site during ground disturbing activities, SWCA finds that **impacts to tribal cultural resources from the Project will be less than significant.**

CONCLUSION AND RECOMMENDATIONS

However unlikely, if Native American artifacts or objects were identified in the Project Site during ground-disturbing activities, they would require evaluation and treatment to determine whether they met the criteria to be a tribal cultural resource, in addition to being assessed as an archaeological resource. Based on a strictly scientific evaluation, any such materials identified within the fill soils are less likely to meet the significance criteria necessary for listing on the CRHR, whereas any components identified within the underlying alluvium are more likely to be a tribal cultural resource on this basis. Regardless of the type of soils in which a Native American artifact or object were identified, any discovery would require assessment by a California Native American tribe to determine whether they have cultural value and meet the definition of a tribal cultural resource.

To ensure that such tribal cultural resource discoveries are evaluated and treated appropriately, SWCA recommends the City impose their standard condition of approval for the inadvertent discovery of a tribal cultural resource. This will ensure there is a means by which the cultural value of a discovery to a California Native American tribe is considered in the evaluation. SWCA recommends that the Gabrieleño Band of Mission Indians – Kizh Nation be identified as the tribal party responsible for carrying out the actions described in the condition of approval if there is a tribal cultural resource discovered during the Project. **Imposing the City’s standard condition of approval to address any inadvertent discoveries will ensure that the potential for impacts to a tribal cultural resource under CEQA is clearly less than significant.**

In their correspondence with City Planning during tribal consultation, the Gabrieleño Band of Mission Indians – Kizh Nation noted that they had not reviewed any information on site history and soils to assess the degree to which sediments had been imported or exported during past developments within the Project Site. This information is contained within portions of this report, the geotechnical investigation, and SWCA’s technical reports addressing archaeological and paleontological resources. SWCA recommends providing copies of these reports to the Gabrieleño Band of Mission Indians – Kizh Nation.

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Attachment A

California Historical Resources Information System Search Results Letter

PARTIALLY CONFIDENTIAL—NOT FOR PUBLIC DISTRIBUTION

This appendix contains sensitive information regarding the nature and explicit location of archaeological and tribal cultural sites, which should not be disclosed to the general public or unauthorized persons pursuant to California Government Code 6254(r) and 6254.10.

Information regarding the location, character, or ownership of a cultural resource is exempt from public disclosure pursuant to the Public Records Act, California Code of Regulations Section 15120 (d).

ATTACHMENT B

Sacred Lands File Search Results

NATIVE AMERICAN HERITAGE COMMISSION

September 12, 2022

David Sayre
SWCA Environmental Consultants

Via Email to: David.sayre@swca.com

Re: The Bloc Project, Los Angeles County

Dear Mr. Sayre:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

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

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

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

Sincerely,



Andrew Green
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

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

**Native American Heritage Commission
Native American Contact List
Los Angeles County
9/12/2022**

Fernandeno Tataviam Band of Mission Indians

Jairo Avila, Tribal Historic and Cultural Preservation Officer
1019 Second Street, Suite 1
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
jairo.avila@tataviam-nsn.us

Tataviam

Gabrielino Tongva Indians of California Tribal Council

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

Gabrielino

Gabrieleno Band of Mission Indians - Kizh Nation

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

Gabrieleno

Gabrielino-Tongva Tribe

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

Gabrielino

Gabrieleno/Tongva San Gabriel Band of Mission Indians

Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Gabrieleno

Santa Rosa Band of Cahuilla Indians

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

Cahuilla

Gabrielino /Tongva Nation

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

Gabrielino

Soboba Band of Luiseno Indians

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

Cahuilla
Luiseno

Gabrielino Tongva Indians of California Tribal Council

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

Gabrielino

Soboba Band of Luiseno Indians

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

Cahuilla
Luiseno

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

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

ATTACHMENT C

Tribal Consultation Summary and Documentation

CONFIDENTIAL—NOT FOR PUBLIC DISTRIBUTION

This appendix contains confidential information submitted by a California Native American tribe during consultation that is considered in the environmental review but is exempt from public disclosure pursuant to Public Resources Code Section 21082.3(c).

Appendix J.2

AB 52 Notification Letters and Verification of Mailings

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN LEUNG
KAREN MACK

DANA M. PERLMAN
YVETTE LOPEZ-LEDESMA
JENNA HORNSTOCK
RENEE DAKE WILSON
VACANT

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

August 4, 2022

CASE No.: ENV-2021-9959-EIR

Project Address: 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street, Los Angeles, California 90017

Community Plan: Central City

Dear Tribal Representative:

This letter is to inform you that the Los Angeles Department of City Planning is reviewing the proposed Project:


The BLOC Project (Project) would construct 466 residential units within a new high-rise tower and include a signage program. The Project would be located within a 4.3-acre developed site known as The Bloc. The Project Site is bound by 7th Street to the north, Hope Street to the east, 8th Street to the south, and Flower Street to the west. The Project Site is currently developed with hotel and commercial uses and associated parking and contains a portal to the 7th Street/Metro Central rail station. The new residential tower would be located on the southern half of the Project Site (the Development Area) within and above the existing nine-story parking/retail podium building. The existing hotel and commercial uses which are located on the Project Site but outside the Development Area would be retained, with the exception of approximately 24,342 square feet of existing commercial uses that would be changed to residential uses. In addition to the new high-rise tower, the rooftop parking level of the existing nine-story parking/retail podium building would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. The residential uses would comprise a total of approximately 495,016 square feet of floor area, consisting of the conversion of approximately 24,342 square feet of existing commercial uses within the podium building and the net increase of 470,674 square feet in the new 53-story tower, which will extend 41-stories above the 12-story podium. The two existing basement levels below the podium building, which include one level of vehicle parking and one level of loading areas, would be retained. The Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. Additionally, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of up to 100 feet. It is estimated that approximately 18,239 cubic yards of export would be hauled from the Project Site.

Per AB 52, you have the right to consult on a proposed public or private project prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. You

have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this Project. Please provide your contact information and mail your request to:

Los Angeles Department of City Planning
Attn: Kathleen King
201 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Email: Kathleen.King@lacity.org
Phone No.: (213) 847-3624

Sincerely,



Vincent P. Bertoni, AICP
Director of Planning

Kathleen King
Major Projects

Attachments:

- Figure 1 Project Location Map
- Figure 2 Aerial Photograph of Project Site and Vicinity
- Figure 3 Illustrative Site Plan

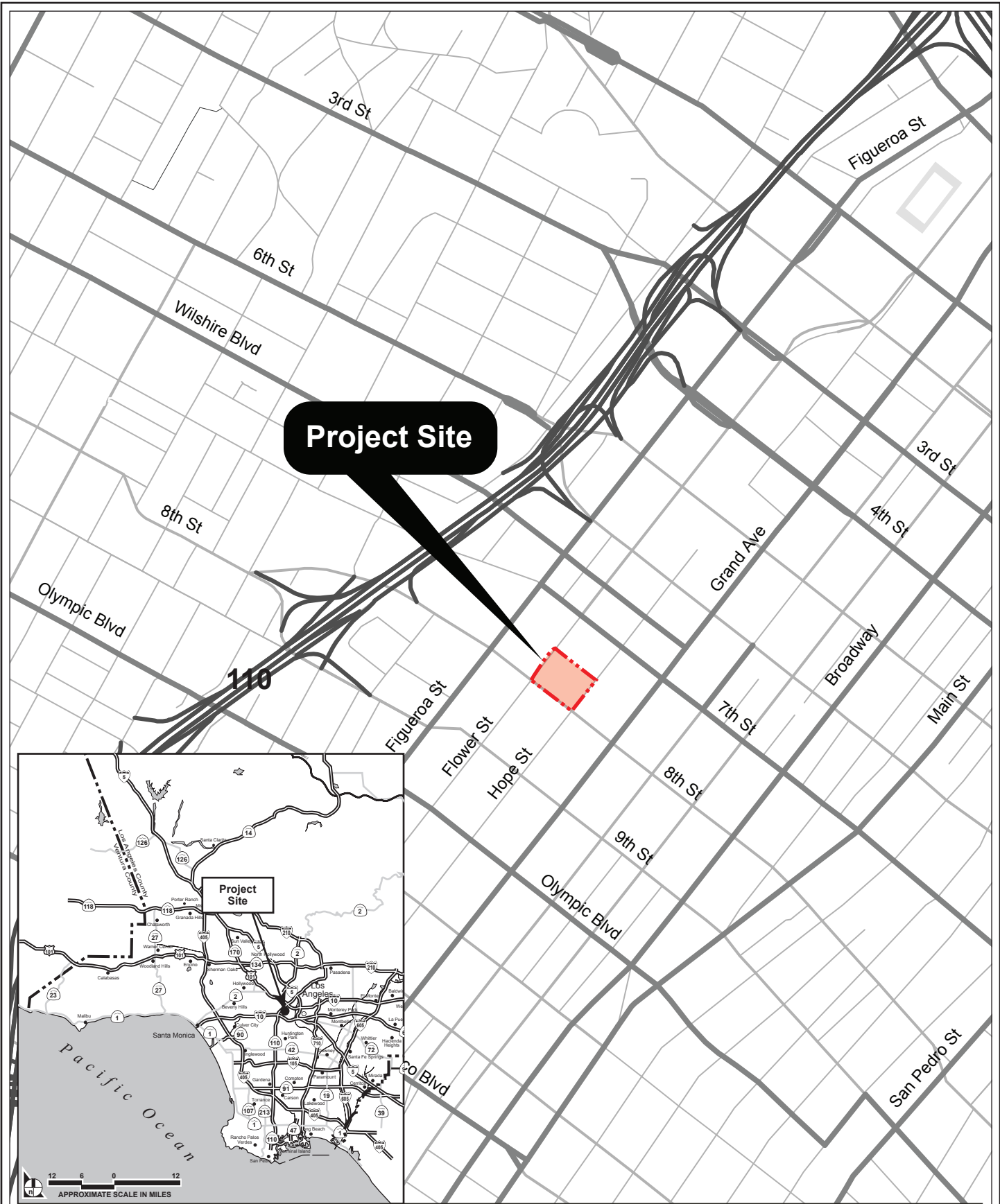


Figure 1
Project Location Map

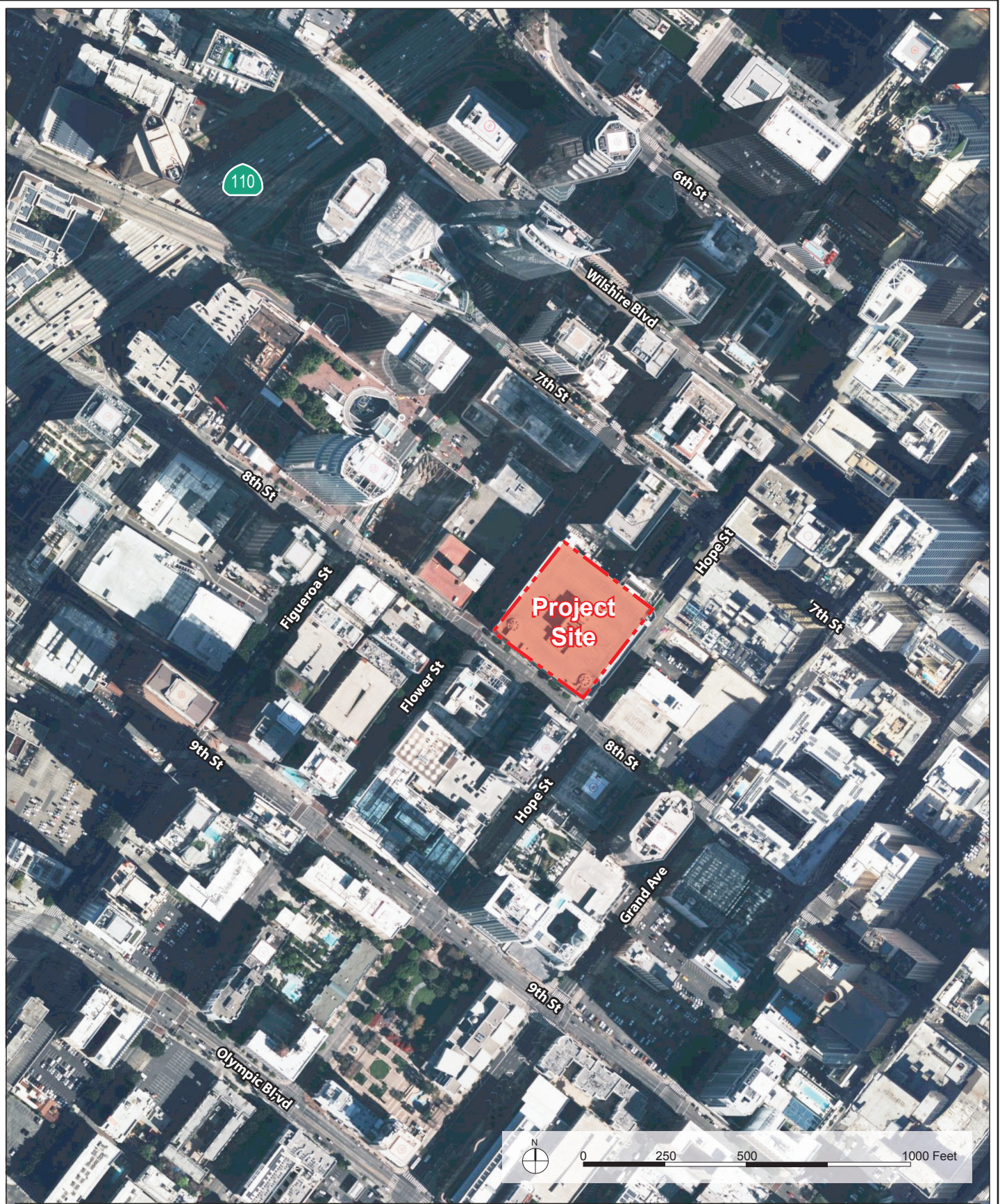


Figure 2
Aerial Photograph of the Project Site and Vicinity

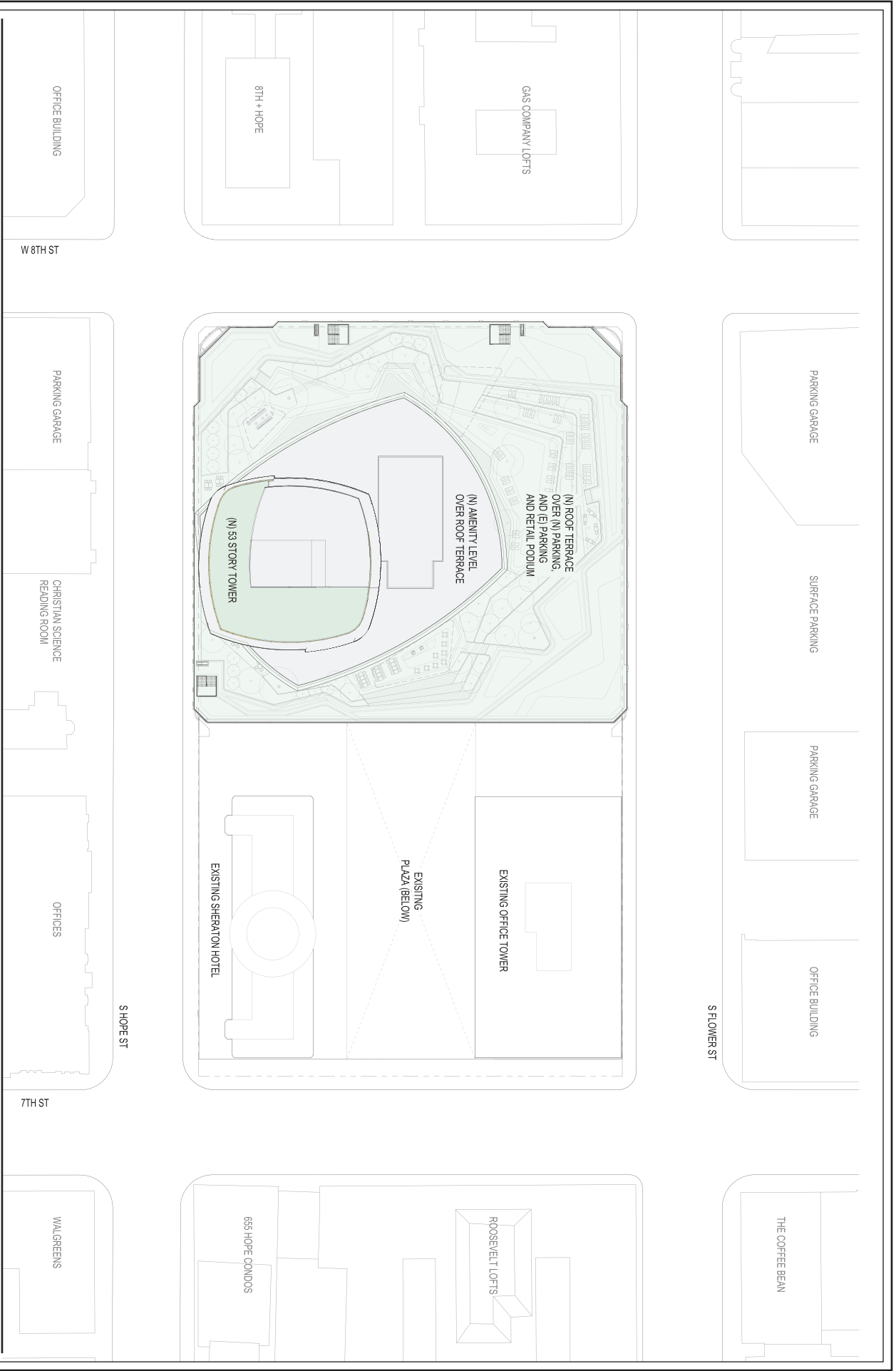


Figure 3
 Illustrative Site Plan

Source: Handal Architects, LLP, 2022.

Dear Customer,

The following is the proof-of-delivery for tracking number: 777563500296

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	E.ZREA	Delivery Location:	1019 2ND ST
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		SAN FERNANDO, CA, 91340
		Delivery date:	Aug 4, 2022 11:16

Shipping Information:

Tracking number:	777563500296	Ship Date:	Aug 3, 2022
		Weight:	0.5 LB/0.23 KG

Recipient:

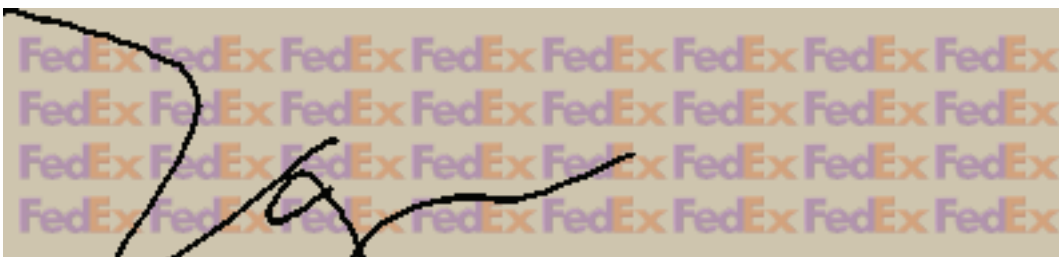
Rudy Ortega, Tribal President, Fernandeno Tataviam
Band of Mission Indians
1019 Second St. Ste. #1
SAN FERNANDO, CA, US, 91340

Shipper:

Stephanie Eyestone Jones, Eyestone Environmental
2121 Rosecrans Ave
Ste. 3355
El Segundo, CA, US, 90245

Reference

The Bloc/AB 52 Letters



Dear Customer,

The following is the proof-of-delivery for tracking number: 777563563268

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	E.ZREA	Delivery Location:	1019 2ND ST
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		SAN FERNANDO, CA, 91340
		Delivery date:	Aug 4, 2022 11:16

Shipping Information:

Tracking number:	777563563268	Ship Date:	Aug 3, 2022
		Weight:	0.5 LB/0.23 KG

Recipient:

Jairo Avila, TribalHistoric&Cultural, Fernandeno Tataviam
Preservation Off. Band of Indians
1019 Second St. Ste. #1
SAN FERNANDO, CA, US, 91340

Shipper:

Stephanie Eyestone Jones, Eyestone Environmental
2121 Rosecrans Ave
Ste. 3355
El Segundo, CA, US, 90245

Reference

The Bloc/AB 52 Letters



Dear Customer,

The following is the proof-of-delivery for tracking number: 777563585983

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	C.CAREY	Delivery Location:	106 1/2 JUDGE JOHN AISO S
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		LOS ANGELES, CA, 90012
		Delivery date:	Aug 4, 2022 14:40

Shipping Information:

Tracking number:	777563585983	Ship Date:	Aug 3, 2022
		Weight:	0.5 LB/0.23 KG

Recipient:

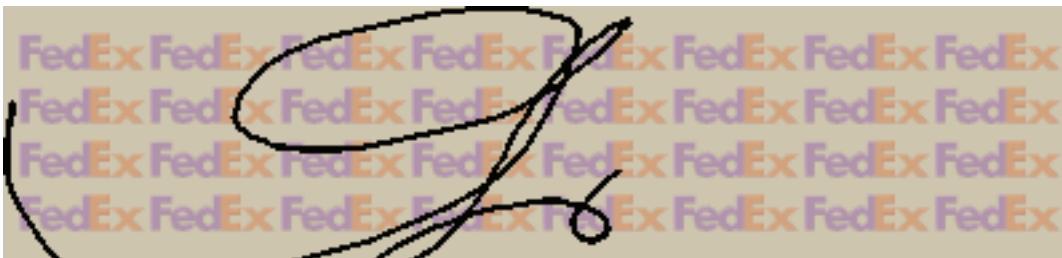
Sandonne Goad, Chairperson, Gabrielino Tongva Nation
106 1/2 Judge John Aiso St., #231
LOS ANGELES, CA, US, 90012

Shipper:

Stephanie Eystone Jones, Eystone Environmental
2121 Rosecrans Ave
Ste. 3355
El Segundo, CA, US, 90245

Reference

The Bloc/AB 52 Letters





August 12, 2022

Dear Customer,

The following is the proof-of-delivery for tracking number: 777563615979

Delivery Information:

Status:	Delivered	Delivered To:	Residence
Signed for by:	Signature not required	Delivery Location:	23454 VANOWEN ST
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday; Residential Delivery		West Hills, CA, 92307
		Delivery date:	Aug 5, 2022 16:07

Shipping Information:

Tracking number:	777563615979	Ship Date:	Aug 3, 2022
		Weight:	0.5 LB/0.23 KG

Recipient:
Charles Alvarez, Gabrielino-Tonga Tribe
23454 Vanowen Street
West Hills, CA, US, 92307

Shipper:
Stephanie Eyestone Jones, Eyestone Environmental
2121 Rosecrans Ave
Ste. 3355
El Segundo, CA, US, 90245

Reference The Bloc/ AB 52 Letters

Thank you for choosing FedEx

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Tracking Number: 70220410000177772919

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Your item has been delivered and is available at a PO Box at 9:56 am on August 5, 2022 in COVINA, CA 91723.

USPS Tracking Plus® Available ∨

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COVINA, CA 91723

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Tracking History



August 5, 2022, 9:56 am

Delivered, PO Box
COVINA, CA 91723

Your item has been delivered and is available at a PO Box at 9:56 am on August 5, 2022 in COVINA, CA 91723.

August 4, 2022, 7:24 pm

Departed USPS Regional Facility
SANTA ANA CA DISTRIBUTION CENTER

August 4, 2022, 4:11 am

Arrived at USPS Regional Facility
SANTA ANA CA DISTRIBUTION CENTER

August 3, 2022, 9:19 pm
Arrived at USPS Regional Origin Facility
LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 2:41 pm
USPS in possession of item
LAWNDALE, CA 90260

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FAQs

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Tracking Number: 70220410000177772926

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Your item was picked up at the post office at 3:04 pm on August 5, 2022 in SAN GABRIEL, CA 91778.

USPS Tracking Plus® Available [v](#)

Delivered, Individual Picked Up at Post Office

August 5, 2022 at 3:04 pm
SAN GABRIEL, CA 91778

Feedback

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Text & Email Updates



Tracking History



August 5, 2022, 3:04 pm

Delivered, Individual Picked Up at Post Office
SAN GABRIEL, CA 91778

Your item was picked up at the post office at 3:04 pm on August 5, 2022 in SAN GABRIEL, CA 91778.

August 5, 2022, 5:57 am

Available for Pickup
SAN GABRIEL, CA 91778

August 5, 2022, 5:15 am

Arrived at Post Office

SAN GABRIEL, CA 91778

August 4, 2022, 3:36 pm

Departed USPS Regional Facility
SANTA ANA CA DISTRIBUTION CENTER

August 4, 2022, 4:11 am

Arrived at USPS Regional Facility
SANTA ANA CA DISTRIBUTION CENTER

August 3, 2022, 9:19 pm

Arrived at USPS Regional Origin Facility
LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 2:41 pm

USPS in possession of item
LAWNDALE, CA 90260

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FAQs

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Tracking Number: 70220410000177772933

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Your item arrived at the BELLFLOWER, CA 90707 post office at 12:05 pm on August 10, 2022 and is ready for pickup.

USPS Tracking Plus® Available ✓

Available for Pickup

August 10, 2022 at 12:05 pm
BELLFLOWER, CA 90707

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Tracking History



August 10, 2022, 12:05 pm

Available for Pickup

BELLFLOWER, CA 90707

Your item arrived at the BELLFLOWER, CA 90707 post office at 12:05 pm on August 10, 2022 and is ready for pickup.

August 9, 2022

In Transit to Next Facility

August 7, 2022, 6:15 pm

Departed USPS Regional Facility

LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 9:19 pm

Arrived at USPS Regional Facility

LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 2:42 pm

USPS in possession of item

LAWNDALE, CA 90260

USPS Tracking Plus®



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Feedback

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Go to our FAQs section to find answers to your tracking questions.

FAQs

[Track Another Package +](#)

Tracking Number: 70220410000177772940

[Remove X](#)

Your item was picked up at the post office at 11:05 am on August 5, 2022 in NEWHALL, CA 91321.

USPS Tracking Plus® Available [v](#)

Delivered, Individual Picked Up at Post Office

August 5, 2022 at 11:05 am
NEWHALL, CA 91321

Feedback

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Text & Email Updates



Tracking History



August 5, 2022, 11:05 am

Delivered, Individual Picked Up at Post Office
NEWHALL, CA 91321

Your item was picked up at the post office at 11:05 am on August 5, 2022 in NEWHALL, CA 91321.

August 5, 2022, 9:55 am

Available for Pickup
NEWHALL, CA 91322

August 4, 2022, 1:52 pm

Departed USPS Regional Facility

SANTA CLARITA CA DISTRIBUTION CENTER

August 4, 2022, 1:40 am

Arrived at USPS Regional Facility

SANTA CLARITA CA DISTRIBUTION CENTER

August 3, 2022, 9:19 pm

Arrived at USPS Regional Origin Facility

LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 2:43 pm

USPS in possession of item

LAWNDALE, CA 90260

USPS Tracking Plus®



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Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

Track Another Package +

Tracking Number: 70220410000177772957

Remove ✕

Your item was picked up at the post office at 11:34 am on August 10, 2022 in SAN JACINTO, CA 92583.

USPS Tracking Plus® Available ✓

✓ **Delivered, Individual Picked Up at Post Office**

August 10, 2022 at 11:34 am
SAN JACINTO, CA 92583

Feedback

Get Updates ✓

Text & Email Updates



Tracking History



August 10, 2022, 11:34 am

Delivered, Individual Picked Up at Post Office
SAN JACINTO, CA 92583

Your item was picked up at the post office at 11:34 am on August 10, 2022 in SAN JACINTO, CA 92583.

August 10, 2022, 9:00 am

Available for Pickup
SAN JACINTO, CA 92581

August 10, 2022, 7:41 am

Arrived at Post Office
SAN JACINTO, CA 92583

August 9, 2022
In Transit to Next Facility

August 6, 2022, 10:17 pm
Departed USPS Regional Facility
SAN DIEGO CA DISTRIBUTION CENTER

August 6, 2022, 12:38 pm
Arrived at USPS Regional Facility
SAN DIEGO CA DISTRIBUTION CENTER

August 3, 2022, 9:19 pm
Arrived at USPS Regional Origin Facility
LOS ANGELES CA DISTRIBUTION CENTER

August 3, 2022, 2:44 pm
USPS in possession of item
LAWNDALE, CA 90260

Feedback

USPS Tracking Plus®



Product Information



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Go to our FAQs section to find answers to your tracking questions.

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Tracking Number: 70220410000177772964

[Remove X](#)

Your item was picked up at the post office at 10:45 am on August 8, 2022 in THERMAL, CA 92274.

USPS Tracking Plus® Available [v](#)

Delivered, Individual Picked Up at Post Office

August 8, 2022 at 10:45 am
THERMAL, CA 92274

Feedback

Get Updates [v](#)

Text & Email Updates



Tracking History



August 8, 2022, 10:45 am

Delivered, Individual Picked Up at Post Office
THERMAL, CA 92274

Your item was picked up at the post office at 10:45 am on August 8, 2022 in THERMAL, CA 92274.

August 5, 2022, 8:57 am

Available for Pickup
THERMAL, CA 92274

August 5, 2022, 8:19 am

Arrived at Post Office

THERMAL, CA 92274

August 4, 2022, 4:42 pm

Departed USPS Regional Facility
MORENO VALLEY CA DISTRIBUTION CENTER

August 4, 2022, 11:51 am

Arrived at USPS Regional Facility
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August 3, 2022, 9:19 pm

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Appendix J.3

AB 52 Pre-Conclusion and Closure Letters

The Pre-Conclusion Letter is confidential
and on file with
the Department of City Planning.



Kathleen King <kathleen.king@lacity.org>

The Bloc Project AB 52 Consultation

Kathleen King <kathleen.king@lacity.org>

Fri, Jan 12, 2024 at 4:00 PM

To: Gabrieleno Administration <admin@gabrielenoindians.org>

Hi Brandy-

Attached is The Bloc Project AB 52 Closure of Consultation Letter. As explained in the Pre-Conclusion letter and in the closure letter attached, due to the lack of substantial evidence of an existing tribal cultural resource within the Project area, impacts would be less than significant and no mitigation measures will be implemented. The City will implement the Condition of Approval for Tribal Cultural Resources Inadvertent Discovery as part of the Project.

Thank you,
Kathleen

[Quoted text hidden]

 **The Bloc AB 52 Consultation Closure_FINAL.pdf**
219K

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

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January 12, 2024

Andrew Salas
Tribal Chairman
Gabrieleño Band of Mission Indians – Kizh Nation
PO Box 393
Covina, CA 91723

RE: AB 52 Notification of Closure of Consultation
700 S. Flower St., 700 W. 7th St., and 711 S. Hope St., Los Angeles, California, 90017
(Case No. ENV-2021-9959-EIR)

Dear Chairman Salas:

Thank you for engaging with the City of Los Angeles in the AB 52 consultation process for the The Bloc Project (Project). The City recognizes that the AB 52 consultation process requires ongoing collaboration between the City and sovereign Tribal governments, including the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe), and appreciates the Tribe's dialogue and collaboration with the City regarding this Project. The purpose of this correspondence is to inform the Tribe of the City's closure of AB 52 consultation for the Project as of today's date, January 12, 2024.

In the City's Pre-Closure of Consultation Letter dated December 27, 2023, we summarized our combined efforts to engage in a meaningful consultation regarding the Project's potential impacts to tribal cultural resources and to document the tribal consultation process, pursuant to Public Resources Code (PRC) Section 21080.3.2 and shared the proposed Condition of Approval. In response to the City's Pre-Closure of Consultation Letter, the Tribe requested three mitigation measures be implemented as part of the Project, which the City acknowledged receipt of on January 5, 2024.

The Tribal Cultural Resources Appendix of the Draft EIR will include an analysis of non-confidential and confidential information and resources the Tribe has provided to the City, as well as, but not limited to, a summary of resources identified in the California Historical Resources Information System by the South Central Coastal Information Center, the results of a Sacred Lands File Search conducted by the Native American Heritage Commission, and background research to assess the potential for a buried tribal cultural resource.

As no substantial evidence was found identifying any tribal cultural resources on the Project Site, the analysis in the Project's Draft EIR concludes that there would not be a potential significant impact on tribal cultural resources. However, the City recognizes the Tribe's concerns and has, therefore, incorporated components of the Tribe's requested mitigation measures into the City's standard Condition of Approval for the Inadvertent Discovery of Tribal Cultural Resources, which

both provide procedures and guidance on steps that would occur in the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered and will be implemented as part of the Project.

As such, the City, after acting in good faith and after reasonable effort, concludes consultation for purposes of AB 52. The closure of consultation does not foreclose the ability of the City or Tribe to continue discussions about the Project and the attached mitigation measure. With the upcoming release of the Draft EIR, a minimum 45-day comment period will commence, during which the Tribe may submit written comments on the adequacy of the Draft EIR, to be made public and incorporated in the Final EIR.

Thank you again for engaging with the City on The Bloc Project.

Respectfully,

A handwritten signature in cursive script that reads "Kathleen King".

Kathleen King
City Planner
Department of City Planning – Major Projects

Condition of Approval - Tribal Cultural Resource Inadvertent Discovery

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities¹, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

¹ Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity