Appendix F3 Cultural and Paleontological Assessment

Appendices

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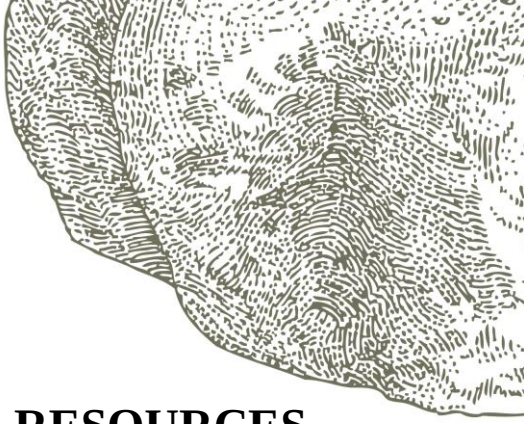
PALEONTOLOGY - ARCHAEOLOGY - HISTORY



CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT FOR THE MCKINLEY ELEMENTARY CAMPUS MASTER PLAN PROJECT, CITY OF SANTA MONICA, LOS ANGELES COUNTY, CALIFORNIA

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Date
September 2022

Cogstone Project Number: 5420
Type of Study: Cultural and Paleontological Resources Assessment
Archaeological Sites: none within the Project Area
USGS 7.5' Quadrangle: Beverly Hills (1995)
Area: 6.50 acres
Key Words: negative archaeological survey, negative paleontological survey, Gabrielino/Tongva territory, proposed historic district

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Federal Certifications WOSB, EDWOSB, SDB
State Certifications DBE, WBE, SBE, UDBE

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

SUMMARY OF FINDINGS

This study was conducted to determine the potential impacts to cultural and paleontological resources during the McKinley Elementary School Master Plan Project, City of Santa Monica (City), Los Angeles County, California (Project; Figure 1). The Santa Monica-Malibu Unified School District is the lead agency under the California Environmental Quality Act (CEQA).

The Proposed Project would redevelop and modernize McKinley Elementary School, including the removal of some existing structures, renovation of structures to remain, and construction of two new buildings and outdoor facilities.

A Historic Resources Inventory report for the historic built environment resources on the McKinley Elementary School Campus has been completed separately by the Historic Resources Group (HRG; Historic Resources Group 2022) and is not part of this study.

Cogstone requested a search of the California Historical Resources Information System (CHRIS) from the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton on February 4, 2022 which included the entire proposed Project Area as well as a half-mile radius. Results of the record search indicate that no previous studies have been completed within the Project Area while an additional 14 studies have been completed previously within a half-mile radius of the Project Area.

Two cultural resources have been recorded within the Project Area and include the Santa Monica Public Schools Thematic District Resource (P-19-188708) and McKinley School (P-19-188709), a contributing resource to the District. Outside of the Project Area a total of three cultural resources have been previously documented within the search radius from the Project Area. These consist of three cultural resources within a quarter- to half-mile of the Project Area.

Cogstone archaeologist Logan Freeberg submitted a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC) on February 4, 2022. The NAHC responded on March 24, 2022 and indicated that there sacred lands or resources known within the same USGS Quadrangle, Township, Range, and Section as the Project Area and to contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians for more information. The NAHC also provided a list of Native American individuals/organizations that may have knowledge of cultural resources and/or sacred lands within or near the Project. The Santa Monica-Malibu Unified School District is responsible for Native American consultations as required by Assembly Bill (AB) 52.
The Gabrieleno/Tongva San Gabriel Band of Mission Indians were contacted via United States Postal service certified mail on June 29, 2022. No response has been received.

Based on the cultural resources record search results, negative pedestrian survey, and review of historic USGS topographic quadrangle maps and USDA historic aerial photographs, the potential for buried historic archaeological resources within the Project Area is low. These sources also indicate that the potential for buried prehistoric archaeological resources is low. The NAHC indicated that there is a sacred site within the same township, range, and section as the McKinley

campus. As such, the potential for buried prehistoric cultural resources is currently assessed to be low to moderate but may be adjusted pending specific information about the location of the sacred site on record with the NAHC.

As sensitivity for buried archaeological resources ranges from low to moderate, no cultural resources monitoring is recommended at this time. A Worker Environmental Awareness Program (WEAP) should be developed by a qualified archaeologist and presented to all personnel who engage in earthwork as well as their supervisors, detailing what cultural resources maybe found in the area. Plans to alter currently undeveloped portions of the McKinley Elementary School campus may proceed without additional conditions.

In the event of an unanticipated discovery, all work must be suspended within 50 feet of the find until a qualified archaeologist evaluates it. In the unlikely event that human remains are encountered during Project development, all work must cease near the find immediately.

In accordance with California Health and Safety Code Section 7050.5, the County Coroner must be notified if potentially human bone is discovered. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with Public Resources Code Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods. Work may not resume in the vicinity of the find until all requirements of the health and safety code have been met.

Paleontological Resources

The Project is mapped as middle to late Pleistocene older alluvium and late Pleistocene to Holocene young alluvium. The record search revealed no fossil localities from within the Project; however, localities are known from sediments similar to those found within the study area near to the Project. Two Pleistocene localities within two miles of the Project in Santa Monica produced ground sloth, horse, and American lion. Approximately five miles east in Culver City, seven localities were found during excavations for the Outfall Sewer in the 1920s. Mastodon, horse, camel, bison, deer, sabre-toothed cat, and Botta's pocket gopher were recovered. Three other localities in Culver City and Westchester produced horse, camel, mammoth, and mastodon.

A records search revealed that all of the fossils previously recovered within a 10-mile radius were a minimum of 6 to 11 feet deep in deposits mapped as Pleistocene at the surface. Sediments with a Holocene component produced fossils starting at 24 feet deep. Given this, older alluvium less than five feet below the modern surface is assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Older alluvial sediments more than five feet below the modern surface are assigned a moderate potential (PFYC 3). Young alluvium deposits less than 20 feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. The young alluvium deposits more than 20 feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to

similar deposits producing fossils at that depth near to the study area. Artificial fill has very low potential for fossils (PFYC 1).

Based upon fossils found in similar sediments nearby, paleontological monitoring is currently recommended for mass excavations into native sediments of older alluvium below a depth of five feet and native sediments of young alluvium below a depth of 20 feet. Drilling or pile driving activities, regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling will not have information about formation, depth or context. The only instance in which such fossils will meet significance criteria is if the fossil is a species new to the region.

If unanticipated fossil discoveries are made, all work must halt within 50 feet until a qualified paleontologist can evaluate the find. Work may resume immediately outside of the 50-foot radius.

INTRODUCTION

PURPOSE OF STUDY

This study was conducted to determine the potential impacts to cultural and paleontological resources during the McKinley Elementary School Master Plan Project, City of Santa Monica (City), Los Angeles County, California (Project; Figure 1). The Santa Monica-Malibu Unified School District is the lead agency under the California Environmental Quality Act (CEQA).

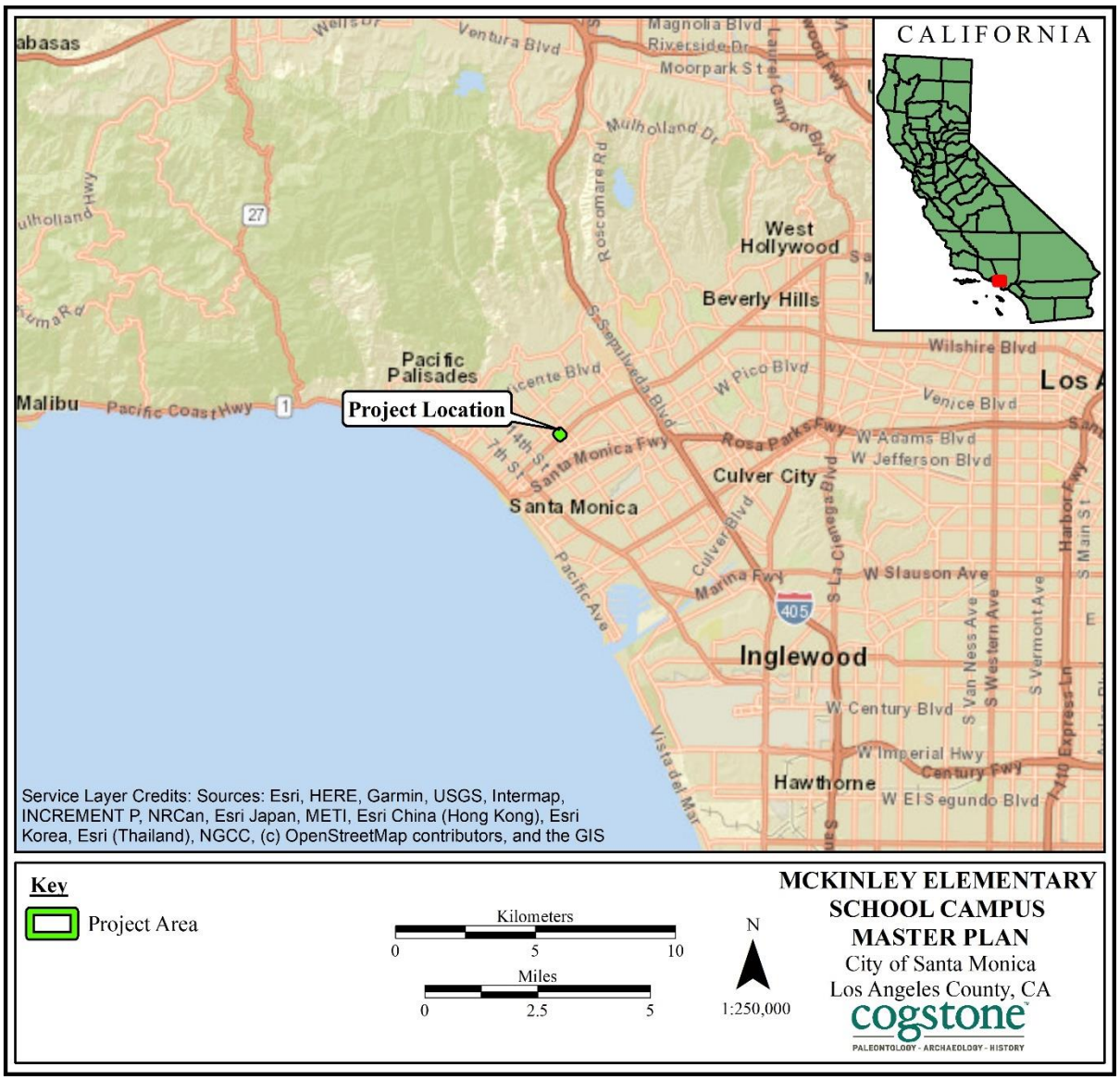

Figure 1. Project vicinity map

PROJECT DESCRIPTION

The Proposed Project would redevelop and modernize McKinley Elementary School, including the removal of some existing structures, renovation of structures to remain, and construction of two new buildings and outdoor facilities. As listed in Table 1, Summary of Building Removal and Demolition, 11 existing portable classrooms (B1 through B11) and playground restrooms would be demolished and removed during Phase 1 of the Proposed Project, totaling approximately 14,824 square feet of demolition. A new, permanent, one-story classroom building would be constructed with eight elementary classrooms; a new front office; and school support spaces, including outdoor classrooms. The new classroom building would replace the 11 portable classrooms and would be constructed in the location of the former parking lot. Phase 1 of the Proposed Project would implement a new drop-off/pick-up queue along Chelsea Avenue. A new interim parking lot would be near the corner of Chelsea Avenue and Arizona. New playground areas would be provided in place of the portables.

Phase 1 of the Proposed Project would also include renovation of the existing library within its current location on the eastern wing of the main building (Building C). The renovated library would be approximately 1,354 square feet and include new openings in existing walls for doors/windows; new foundations at library perimeter walls; seismic bracing; upgraded lighting, new electrical, new data systems; modifications to HVAC system; and upgrades to travel paths between library and the proposed new classroom building. The library would accommodate 50-60 students, and would provide sitting and standing position for staff, with visibility and clear lines of sight. It would include multi-purpose and collaborative areas to support presentations, and provide access to tablets for up to 30-35 students at a time. The library renovation would not increase the library area.

One preschool classroom modular building (Building D), the interim parking lot, and the existing learning garden would be demolished and removed as part of Phase 2. A new two-story transitional kindergarten (T-K), kindergarten, and elementary classroom building would be constructed. The new two-story building would be constructed at the location of the interim parking lot adjacent to the new one-story classroom building. All indoor classrooms in the preschool, transitional kindergarten, and kindergarten area would be located on the ground floor. Both buildings would be on the eastern portion of the campus along Chelsea Avenue. The former location of the front office in Building C would be renovated to provide a new faculty center with a work room, collaborative staff room, six offices, and a room for records.

A new loggia would be constructed around the perimeter of the main courtyard at the ground floor to provide covered outdoor classroom space and walkways for covered outdoor pedestrian circulation. New buildings would connect to the existing historic main building's (Building C) north and south wings at the ground and second floors. The connections would not be permanent features and would be constructed of covered outdoor walkways. The new learning

center/garden with landscaping benches would be established west of the main building (Building C) adjacent to the existing lunch area. Phase 2 of the Proposed Project would include a new covered outdoor passage to the south wing of Building C, stairs, and elevator just north of the main building (Building C) at the new learning center. A new lunch shelter with lunch tables would be provided along the multipurpose room (Building A) to provide shade for outdoor eating. The parking lots would be reconfigured, and a new parking lot with 80 parking stalls would be in the northwest portion of the campus near the corner of Arizona Avenue and 23rd Street, and another parking lot with 20 parking spaces for early education, visitors, and American with Disabilities Act (ADA)-compliant stalls would be provided along Chelsea Avenue along the new drop-off/pick-up queue. The remaining buildings would remain as is.

Table 1. Summary of Building Removal and Demolition

Name	Square Footage
Phase 1	
Eleven Portable Classrooms (B1-B11)	10,560
Playground Restrooms	468
Existing Parking Lot	35,284
Phase 2	
One Modular Building (Building D)	3,796
Interim Parking Lot	XX
Total Demolition Square Footage	XXXX

As shown in Table 2, Summary of Total Development, the Proposed Project would provide 14 new classrooms to the McKinley Elementary School campus. At completion of the Proposed Project, the campus would include 30 core academic classrooms from preschool through fifth grade, including special education, and dedicated outdoor play areas for preschool through kindergarten.

Table 2. Summary of Total Development

Building	Status	Classrooms	Square Footage	Maximum Height
New Construction				
Phase 1				
One New Classroom Building (New Elementary Classrooms and New Front Office and School Support Spaces)	New	8		
New Parking Lot (Arizona Avenue/Chelsea Avenue)	New	-	-	-
Renovated Library	Existing	-	1,354	No Change
Phase 2				
New Two-Story Building for T-K/Kindergarten and Elementary Classrooms	New	6		
New Playfields and Playgrounds	New	-		-

New Parking Lots (Arizona Avenue/23rd Street and Chelsea Avenue)	New	-		-
Subtotal – New Development		TBD	TBD	
Existing Buildings				
Building A	Existing	-	4,439	
Building B	Existing	8	13,425	
Building C	Existing	11	27,390	
Building D	Removed	2	- 3,796	
Subtotal - Existing Development				
Total		TBD	TBD	

PROJECT LOCATION

The Project Area consists of approximately 66.01 acres at 2401 Santa Monica Blvd. in the City of Santa Monica, Los Angeles County, California. The Project Area is within Section 32 of Township 1 South, Range 15 West, and Section 5 of Township 2 South, Range 15 West, San Bernardino Baseline and Meridian on the Beverly Hills 7.5-minute United States Geological Survey (USGS) topographic quadrangle map. Expected depth of disturbance is XX feet for grading and XX feet for utilities trenching.

HISTORIC BUILDING EVALUATIONS

A Historic Resources Inventory report for the historic built environment resources on the McKinley Elementary School Campus has been completed separately by the Historic Resources Group (HRG; 2022) and is not part of this study.

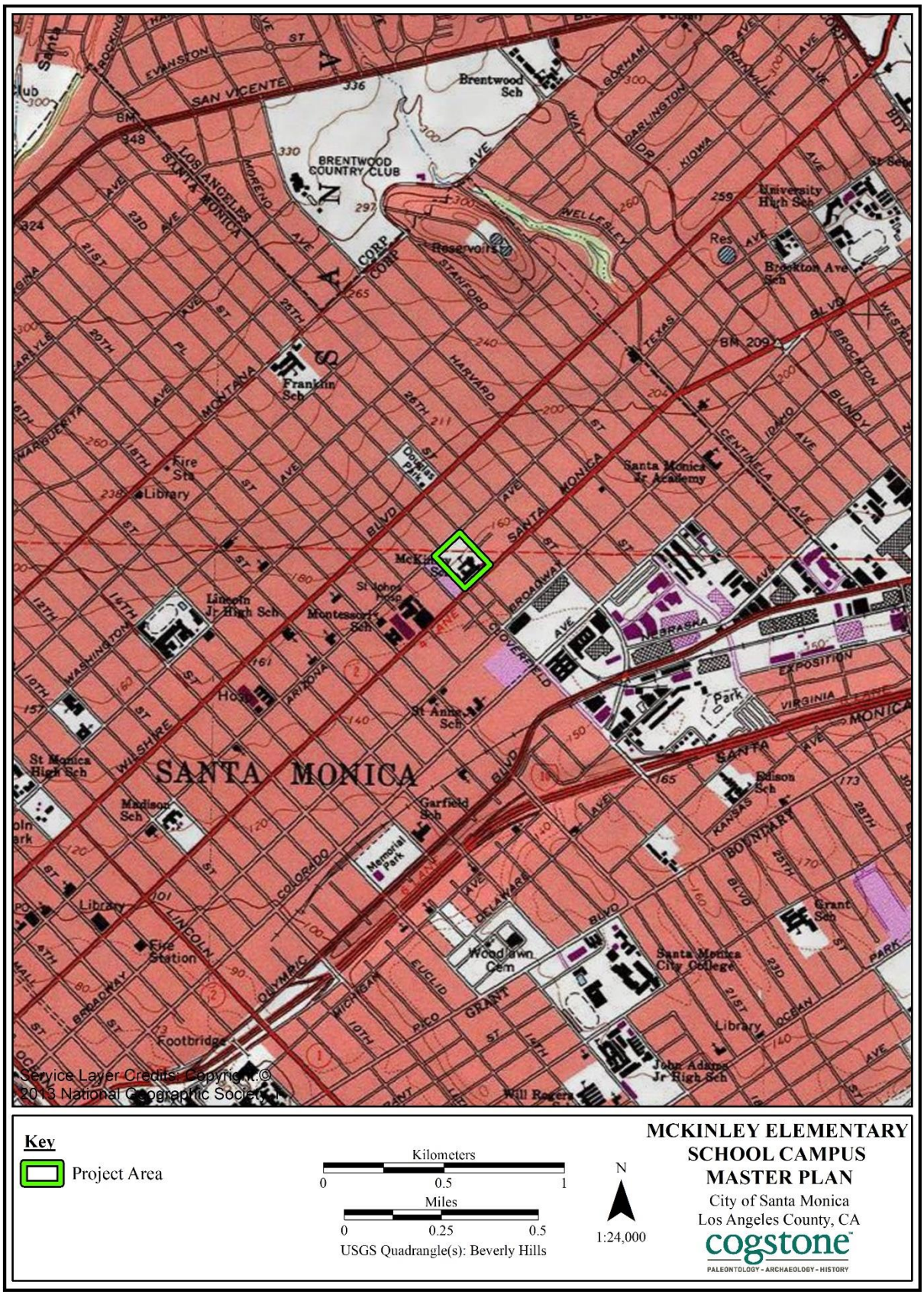

Figure 2. Project location map

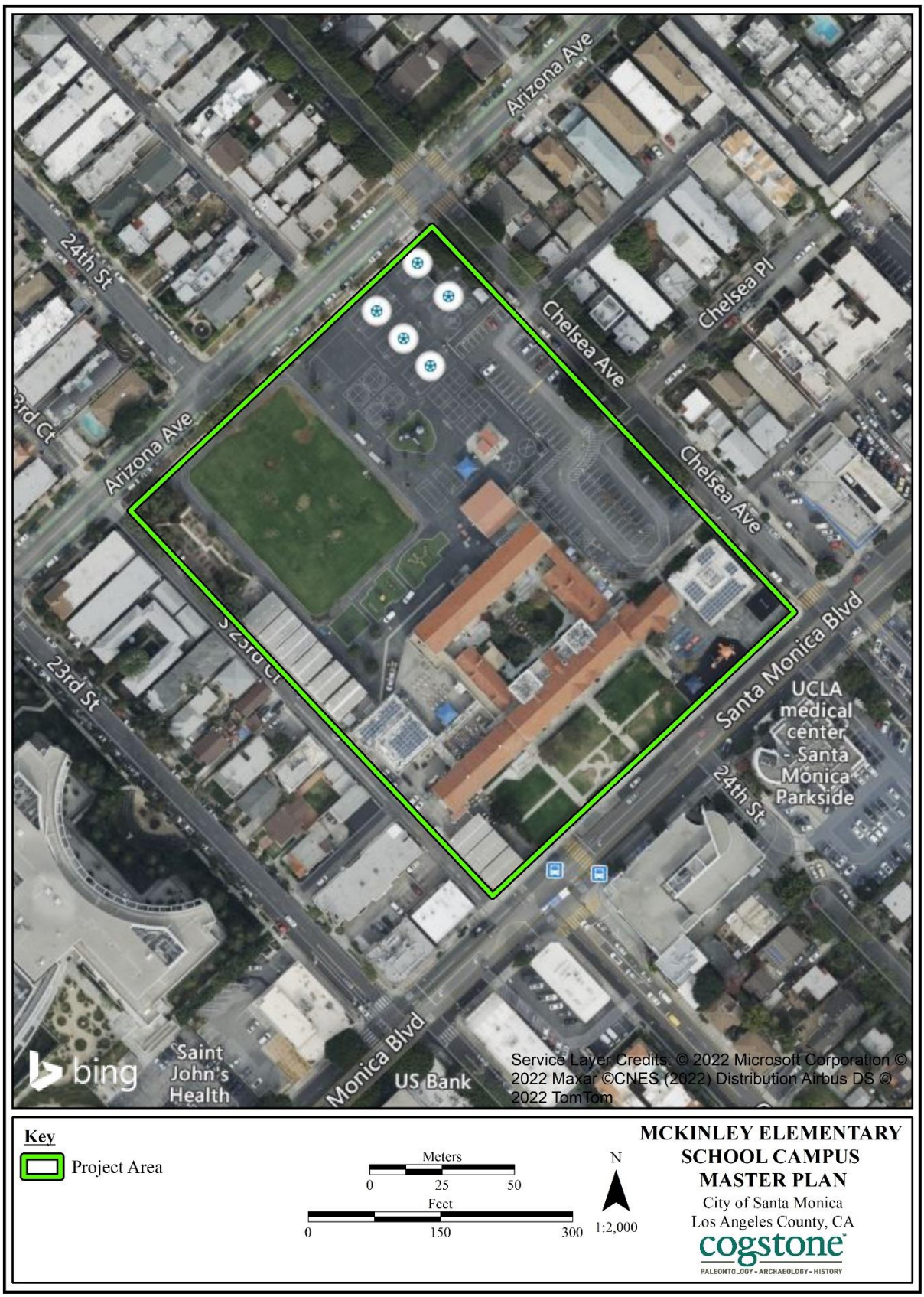

Figure 3. Project aerial map

PROJECT PERSONNEL

Cogstone Resource Management, Inc. (Cogstone) conducted a cultural and paleontological resources assessment and prepared this report. Resumes of key personnel are provided in Appendix A.

- John Gust, PhD, Registered Professional Archaeologist (RPA), served as the Task Manager and Principal Investigator for Archaeology for the Project, and reviewed this report. Dr. Gust has a PhD in Anthropology from the University of California (UC), Riverside, and over 10 years of experience in archaeology.
- Sandy Duarte conducted the pedestrian survey and co-authored this report. Mrs. Duarte holds a B.A. in Anthropology from UC Santa Barbara, and has more than 18 years of experience in southern California archaeology.
- Kelly Vreeland co-authored this report. Ms. Vreeland has an M.S. in Geology, with an emphasis in paleontology, from California State University (CSU), Fullerton, as well as 10 years of experience in California paleontology and geology.
- Kim Scott served as the Principal Investigator for Paleontology for the Project. Ms. Scott has an M.S. in Biology with paleontology emphasis from CSU San Bernardino, a B.S. in Geology with paleontology emphasis from the University of California, Los Angeles (UCLA), and over 26 years of experience in California paleontology and geology.
- Logan Freeberg prepared the maps for the report. Mr. Freeberg holds a B.A. in Anthropology from UC Santa Barbara, a Geographic Information Systems (GIS) certificate from CSU Fullerton, and has more than 19 years of experience in southern California archaeology.
- Molly Valasik provided overall QA/QC for the Project. Ms. Valasik has an M.A. in Anthropology from Kent State University in Ohio and 13 years of experience in southern California archaeology.
- Eric Scott provided QA/QC of the paleontology and geology sections of this report. Mr. Scott has an M.A. in Anthropology, with an emphasis in biological paleoanthropology, from UCLA, and more than 38 years of experience in California paleontology.

REGULATORY ENVIRONMENT

STATE LAWS AND REGULATIONS

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA states that: It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required are intended to assist public agencies in systematically identifying both the significant effects of proposed project and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.

CEQA declares that it is state policy to: "take all action necessary to provide the people of this state with...historic environmental qualities." It further states that public or private projects financed or approved by the state are subject to environmental review by the state. All such projects, unless entitled to an exemption, may proceed only after this requirement has been satisfied. CEQA requires detailed studies that analyze the environmental effects of a proposed project. In the event that a project is determined to have a potential significant environmental effect, the act requires that alternative plans and mitigation measures be considered.

TRIBAL CULTURAL RESOURCES

As of 2015, CEQA established that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code, § 21084.2). In order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or
(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

To help determine whether a project may have such an effect, the lead agency must consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code §20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

PUBLIC RESOURCES CODE

Section 5097.5: No person shall knowingly and willfully excavate upon, or remove, destroy,

injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands (lands under state, county, city, district or public authority jurisdiction, or the jurisdiction of a public corporation), except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor. As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (CRHR) is a listing of all properties considered to be significant historical resources in the state. The California Register includes all properties listed or determined eligible for listing on the National Register, including properties evaluated under Section 106, and State Historical Landmarks No. 770 and above. The California Register statute specifically provides that historical resources listed, determined eligible for listing on the California Register by the State Historical Resources Commission, or resources that meet the California Register criteria are resources which must be given consideration under CEQA (see above). Other resources, such as resources listed on local registers of historic resources or in local surveys, may be listed if they are determined by the State Historic Resources Commission to be significant in accordance with criteria and procedures to be adopted by the Commission and are nominated; their listing in the California Register is not automatic.

Resources eligible for listing include buildings, sites, structures, objects, or historic districts that retain historical integrity and are historically significant at the local, state or national level under one or more of the following four criteria:

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

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance.

Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or

appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

NATIVE AMERICAN HUMAN REMAINS

Sites that may contain human remains important to Native Americans must be identified and treated in a sensitive manner, consistent with state law (i.e., Health and Safety Code §7050.5 and Public Resources Code §5097.98), as reviewed below:

In the event that human remains are encountered during Project development and in accordance with the Health and Safety Code Section 7050.5, the County Coroner must be notified if potentially human bone is discovered. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with Public Resources Code Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods.

CALIFORNIA ADMINISTRATIVE CODE, TITLE 14, SECTION 4307

This section states that "No person shall remove, injure, deface or destroy any object of paleontological, archeological or historical interest or value."

DEFINITION OF SIGNIFICANCE FOR PALEONTOLOGICAL RESOURCES

Only qualified, trained paleontologists with specific expertise in the type of fossils being evaluated can determine the scientific significance of paleontological resources. Fossils are considered to be significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life;

5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

As so defined, significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important (Scott and Springer 2003; Scott et al. 2004).

BACKGROUND

GEOLOGIC SETTING

The Project lies within the Los Angeles Basin, a sedimentary basin which includes the coastal plains of Los Angeles and Orange counties and out to Catalina Island, California. This region is bounded by the Santa Ana Mountains to the east, the Santa Monica Mountains to the north, and the San Joaquin Hills to the south. The marine Los Angeles Basin began to develop in the early Miocene, about 23 million years ago. Through time the basin transitioned to terrestrial deposition by the middle Pleistocene, about 1 million years ago.

The area is part of the coastal section of the northernmost Peninsular Range Geomorphic Province and is characterized by elongated northwest-trending mountain ridges separated by sediment-floored valleys. Subparallel faults branching off from the San Andreas Fault to the east create the local mountains and hills. The Peninsular Ranges Geomorphic Province is located in the southwestern corner of California and is bounded by the Transverse Ranges Geomorphic Province to the north and the Colorado Desert Geomorphic Province to the east (Wagner 2002).

STRATIGRAPHIC SETTING

The Project is mapped as middle to late Pleistocene (774,000 to 11, 700 years ago) old alluvial fan deposits and Holocene (less than 11,700 years ago) alluvial fan deposits (Campbell et al. 2014). Additionally, various amounts of modern artificial fill are present from the previous development of the school and were noted during the pedestrian survey (Figure 4).

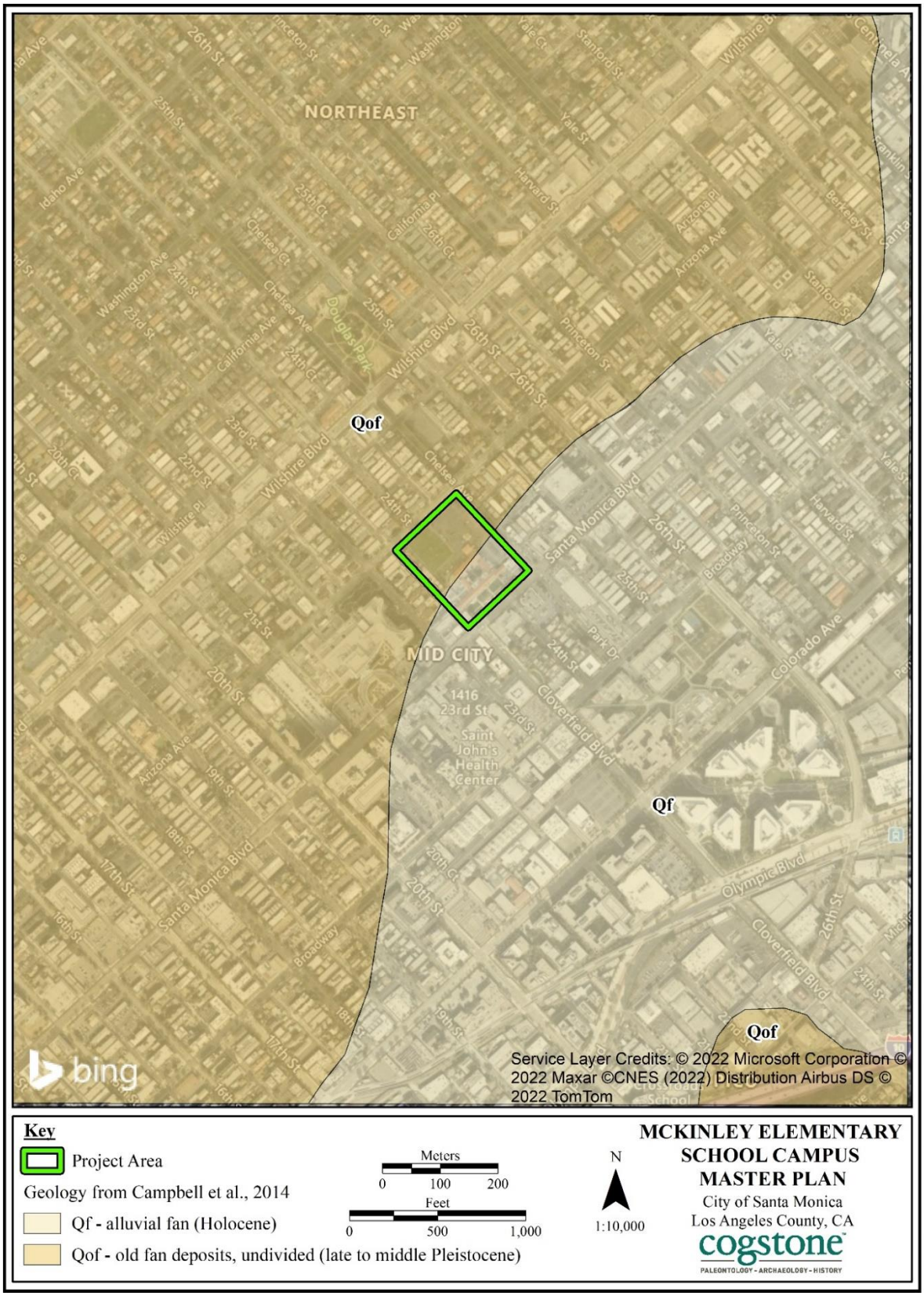

Figure 4. Project geology map

Old alluvial fan deposits, middle to late Pleistocene
Alluvial fan deposits are deposited along the outer slopes of our valleys from local mountains via the mouths of canyons. These deposits have been uplifted or otherwise removed from the area of recent sedimentation. Sediments are slightly to moderately indurated, silts to bouldery conglomerates, with slightly to moderately dissected fan surfaces, and moderately to well-developed pedogenic soils (Campbell et al. 2014).

Alluvial fan deposits, Holocene
Like the old alluvial fan deposits, these Holocene alluvial fan deposits are deposited along the outer slopes of valleys from local mountains. The Holocene alluvial fan deposits consist of unconsolidated silt, sand, and gravel, with some boulders and cobbles (Campbell et al. 2014).

Artificial fill, modern
In California, most artificial fill is less than 100 years old and is associated with construction activities. The Project Area has been previously developed and likely contains various amounts of artificial fill placed during prior development.

PALEONTOLOGICAL SETTING
During the past 100,000 years or so, southern California's climate has shifted from the cooler and damper conditions of the last glacial period to the warmer and dryer conditions of the Holocene interglacial. While continental ice sheets covered the interior of northern North America, southern California was ice free.

Fossils of Monterey cypress (*Hesperocyparis macrocarpa*), Monterey pine (*Pinus radiata*), and Torrey pine (*Pinus* sp. cf. *P. torreyana*) have been found in middle to late Pleistocene deposits in the Wilshire District of Los Angeles (Scott et al. 2014). Fossils of Monterey cypress are also known from middle to late Pleistocene deposits in Costa Mesa, California and the late Pleistocene Rancho la Brea asphalt seeps of the Wilshire District of Los Angeles (Axelrod and Govean 1996; Stock and Harris 1992). Today the most restricted conifers (Monterey cypress and Torrey pine), only inhabit locations on the coasts with cool, moist summers characterized by abundant sea fog. These locations experience a mean summer high temperature of 70ºF - 83ºF (21.1ºC - 28.3ºC). Winters are cool and damp with average precipitation of 10.59" - 32.41" (26.90cm - 82.32cm). Cold water upwellings due to submarine canyons adjacent to the shore near the relict populations create these conditions (Intellicast 2014; the Weather Channel 2014).

ENVIRONMENTAL SETTING

Located in Los Angeles County, the Project is situated approximately 14 miles northeast-east of downtown Los Angeles. The Los Angeles River lays 15 miles to the east, Ballona Creek is approximately four miles to the south, and the Pacific Ocean is two miles to the west of the Project.

The current Mediterranean-like climate is characterized by warm, dry summers and cool, moist winters, with rainfall predominantly falling between November and May. Mild breezes reach the area from the Pacific Ocean, located west and south of the Project Area.

PREHISTORIC SETTING

Approaches to prehistoric frameworks have changed over the past half century from being based on material attributes to radiocarbon chronologies to association with cultural traditions. Archaeologists defined a material complex consisting of an abundance of milling stones (for grinding food items) with few projectile points or vertebrate faunal remains dating from about 7 to 3 thousand years before the present as the "Millingstone Horizon" (Wallace 1955). Later, the "Millingstone Horizon" was redefined as a cultural tradition named the Encinitas Tradition (Warren 1968) with various regional expressions including Topanga and La Jolla. Use by archaeologists varied as some adopted a generalized Encinitas Tradition without regional variations, some continued to use "Millingstone Horizon" and some used Middle Holocene (the time period) to indicate this observed pattern (Sutton and Gardner 2010:1-2).

Recently, it was recognized that generalized terminology is suppressing the identification of cultural, spatial, and temporal variation and the movement of peoples throughout space and time. These factors are critical to understanding adaptation and change (Sutton and Gardner 2010:1-2). The Encinitas Tradition characteristics are abundant metates and manos, crudely made core and flake tools, bone tools, shell ornaments, very few projectile points with subsistence focusing on collecting (plants, shellfish, etc.; Sutton and Gardner 2010:7). Faunal remains vary by location but include shellfish, land animals, marine mammals, and fish.

The Encinitas Tradition is currently redefined as comprising four geographical patterns (Sutton and Gardner 2010:8-25). These are (1) Topanga in coastal Los Angeles and Orange counties, (2) La Jolla in coastal San Diego County, (3) Greven Knoll in inland San Bernardino, Riverside, Orange, and Los Angeles counties, and (4) Pauma in inland San Diego County.

About 3,500 years before present the Encinitas Tradition was replaced in the greater Los Angeles Basin by the Del Rey Tradition (Sutton 2010). This tradition has been generally assigned to the Intermediate and Late Prehistoric periods. The changes that initiated the beginning of the Intermediate Period include new settlement patterns, economic foci, and artifact types that coincided with the arrival of a biologically distinctive population. The Intermediate and Late Prehistoric periods have not been well-defined. Many archaeologists have proposed, however, that the beginning of the Intermediate marked the arrival of Takic-speaking groups (from the Mojave Desert, southern Sierra Nevada, and San Joaquin Valley) and that the Late Prehistoric Period reflected Shoshonean groups (from the Great Basin). Related cultural and biological

changes occurred on the southern Channel Islands about 300 years later.

As defined by Sutton (2010), the Del Rey Tradition replaces usage of the Intermediate and Late Prehistoric designations for both the southern California mainland and the southern Channel Islands. Within the Del Rey Tradition are two regional patterns named Angeles and Island. The Del Rey Tradition represents the arrival, divergence, and development of the Gabrielino in southern California.

PREHISTORIC CHRONOLOGY

The latest cultural revisions for the Project Area define traits for time phases of the Topanga pattern of the Encinitas Tradition applicable to coastal Los Angeles and Orange counties (Sutton and Gardner 2010; Table 3). This pattern is replaced in the Project Area by the Angeles pattern of the Del Rey Tradition later in time (Sutton 2010).

Table 3. Cultural Patterns and Phases

Phase	Dates BP	Material Culture	Other Traits
Topanga I	8,500 to 5,000	Abundant manos and metates, many core tools and scrapers, few but large points, charmstones, cogged stones, early discoidals, faunal remains rare	Shellfish and hunting important, secondary burials under metate cairns (some with long bones only), some extended inhumations, no cremations
Topanga II	5,000 to 3,500	Abundant but decreasing manos and metates, adoption of mortars and pestles, smaller points, cogged stones, late discoidals, fewer scraper planes and core tools, some stone balls and charmstones	Shellfish important, addition of acorns, reburial of long bones only, addition of flexed inhumations (some beneath metate cairns), cremations rare
Topanga III	3,500 to 1,000	Abundant but decreasing manos and metates, increasing use of mortars and pestles, wider variety of small projectile points, stone-lined ovens	Hunting and gathering important, flexed inhumations (some under rock cairns), cremations rare, possible subsistence focus on yucca/agave
Angeles IV	1,000 to 800	Cottonwood arrow points for arrows appear, *Olivella* cupped beads and *Mytilus* shell disks appear, some imported pottery appears, possible appearance of ceramic pipes	Changes in settlement pattern to fewer but larger permanent villages, flexed primary inhumations, cremations uncommon
Angeles V	800 to 450	Artifact abundance and size increases, steatite trade from islands increases, larger and more elaborate effigies	Development of mainland dialect of Gabrielino, settlement in open grasslands, exploitation of marine resources declined and use of small seeds increased, flexed primary inhumations, cremations uncommon
Angeles VI	450 to 150	Addition of locally made pottery, metal needle-drilled *Olivella* beads, addition of Euro-American material culture (glass beads and metal tools)	Use of domesticated animals, flexed primary inhumations continue, some cremations

Topanga Pattern groups were relatively small and highly mobile. Sites known are temporary campsites, not villages and tend to be along the coast in wetlands, bays, coastal plains, near-

coastal valleys, marine terraces, and mountains. The Topanga toolkit is dominated by manos and metates with projectile points scarce (Sutton and Gardner 2010:9).

In Topanga Phase I other typical characteristics were a few mortars and pestles, abundant core tools (scraper planes, choppers, and hammerstones), relatively few large, leaf-shaped projectile points, cogged stones, and early discoidals. Secondary inhumation under cairns was the common mortuary practice. In Orange County as many as 600 flexed burials were present at one site and dated 6,435 radiocarbon years before present (Sutton and Gardner 2010:9, 13).

In Topanga Phase II, flexed burials and secondary burial under cairns continued. Adoption of the mortar and pestle is a marker of this phase. Other typical artifacts include manos, metates, scrapers, core tools, discoidals, charmstones, cogged stones, and an increase in the number of projectile points. In Orange County stabilization of sea level during this time period resulted in increased use of estuary, near shore, and local terrestrial food sources (Sutton and Gardner 2010:14-16).

In Topanga Phase III, there was continuing abundance of metates, manos, and core tools plus increasing amounts of mortars and pestles. More numerous and varied types of projectile points are observed along with the introduction of stone-line earthen ovens. Cooking features such as these were possibly used to bake yucca or agave. Both flexed and extended burials are known (Sutton and Gardner 2010:17).

The Angeles pattern generally is restricted to the mainland and appears to have been less technologically conservative and more ecologically diverse, with a largely terrestrial focus and greater emphases on hunting and nearshore fishing (Sutton 2010).

The Angeles IV phase is marked by new material items including Cottonwood points for arrows, *Olivella* cupped beads, *Mytilus* shell disks, birdstones (zoomorphic effigies with magico-religious properties), and trade items from the Southwest including pottery. It appears that populations increased and that there was a change in the settlement pattern to fewer but larger, permanent villages. Presence and utility of steatite vessels may have impeded the diffusion of pottery into the Los Angeles Basin. The settlement pattern altered to one of fewer and larger permanent villages. Smaller special-purpose sites continued to be used (Sutton 2010).

Angeles V components contain more and larger steatite artifacts, including larger vessels, more elaborate effigies, and comals. Settlement locations shifted from woodland to open grasslands. The exploitation of marine resources seems to have declined and use of small seeds increased. Many Gabrielino inhumations contained grave goods while cremations did not (Sutton 2010).

The Angeles VI phase reflects the ethnographic mainland Gabrielino of the post-contact period (i.e., after A.D. 1542; Sutton 2010). One of the first changes in Gabrielino culture after contact

was undoubtedly population loss due to disease, coupled with resulting social and political disruption. Angeles VI material culture is essentially Angeles V augmented by a number of Euro-American tools and materials, including glass beads and metal tools such as knives and needles (used in bead manufacture). The frequency of Euro-American material culture increased through time until it constituted the vast majority of materials used. Locally produced brownware pottery appears along with metal needle-drilled Olivella disk beads.

The ethnographic mainland Gabrielino subsistence system was based primarily on terrestrial hunting and gathering, although nearshore fish and shellfish played important roles. Sea mammals, especially whales (likely from beached carcasses), were prized. In addition, a number of European plant and animal domesticates were obtained and exploited. Ethnographically, the mainland Gabrielino practiced interment and some cremation.

ETHNOGRAPHY

Early Native American peoples of the Project Area are poorly understood. They were replaced about 1,000 years ago by the Gabrielino (Tongva) who were semi-sedentary hunters and gatherers. The Gabrielino speak a language that is part of the Takic language family. Their territory encompassed a vast area stretching from Topanga Canyon in the northwest, to the base of Mount Wilson in the north, to San Bernardino in the east, Aliso Creek in the southeast and the Southern Channel Islands, in all an area of more than 2,500 square miles (Bean and Smith 1978; McCawley 1996; Figure 5). At European contact, the tribe consisted of more than 5,000 people living in various settlements throughout the area. Some of the villages could be quite large, housing up to 150 people. The closest known village to the Project Area is Wanaawna located 4.96 miles south-southeast.

The Gabrielino are considered to have been one of the wealthiest tribes and to have greatly influenced tribes they traded with (Kroeber 1976:621). Houses were domed, circular structures thatched with tule or similar materials (Bean and Smith 1978:542). The best-known artifacts were made of steatite and were highly prized. Many common everyday items were decorated with inlaid shell or carvings reflecting an elaborately developed artisanship (Bean and Smith 1978:542).

The main food zones utilized were marine, woodland, and grassland (Bean and Smith 1978). Plant foods were, by far, the greatest part of the traditional diet at contact. Acorns were the most important single food source. Villages were located near water sources necessary for the leaching of acorns, which was a daily occurrence. Grass seeds were the next most abundant plant food used along with chia. Seeds were parched, ground, and cooked as mush in various combinations according to taste and availability. Greens and fruits were eaten raw or cooked or sometimes dried for storage. Bulbs, roots, and tubers were dug in the spring and summer and usually eaten fresh. Mushrooms and tree fungus were prized as delicacies. Various teas were

made from flowers, fruits, stems, and roots for medicinal cures as well as beverages (Bean and Smith 1978:538-540).

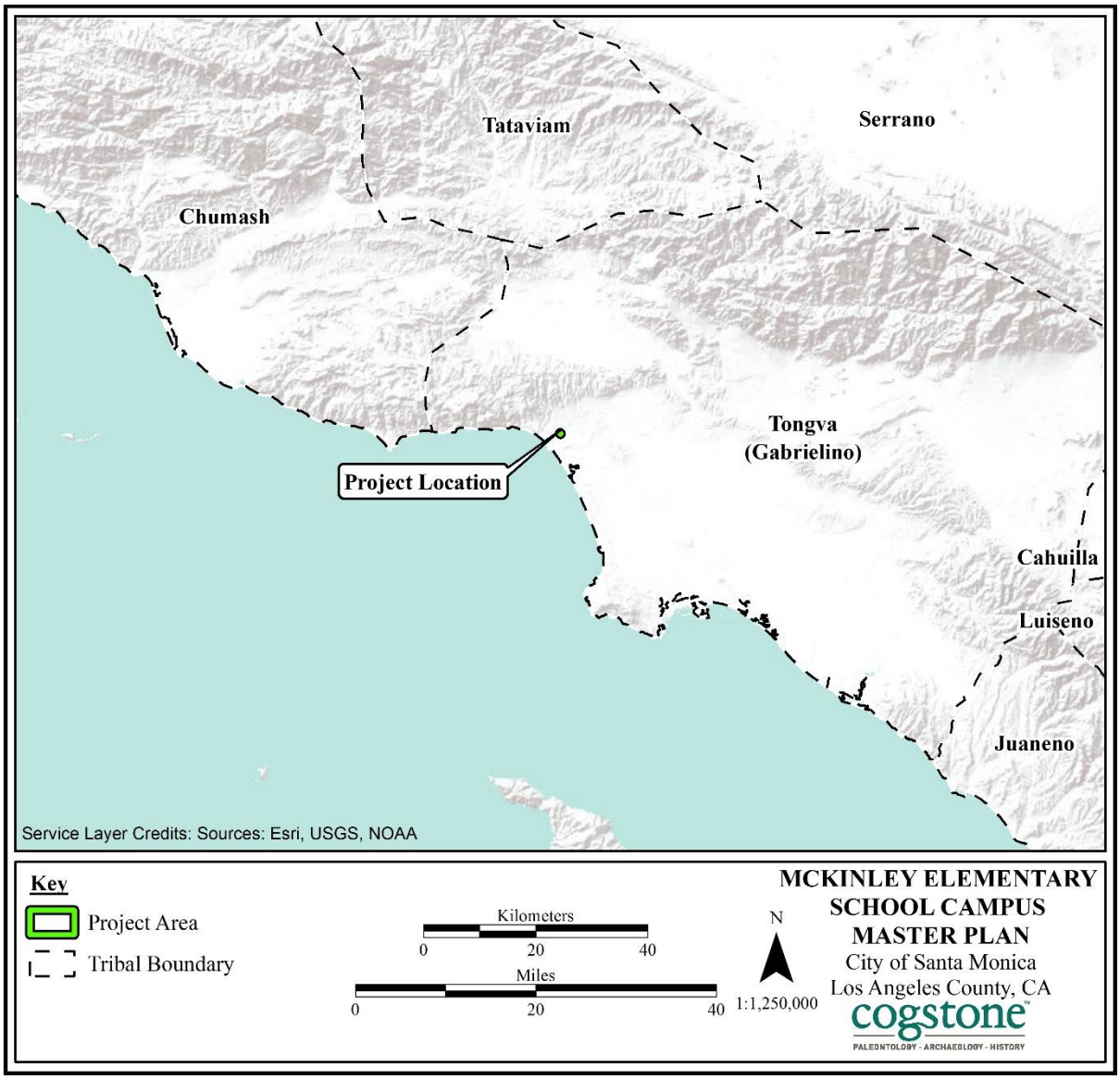

Figure 5. Tribal territories map

The principal game animals were deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, antelope, quail, dove, ducks, and other birds. Most predators were avoided as food, as were tree squirrels and most reptiles. Trout and other fish were caught in the streams, while salmon were available when they ran in the larger creeks. Marine foods were extensively utilized. Sea mammals, fish, and crustaceans were hunted and gathered from both the shoreline and the open ocean, using reed and dugout canoes. Shellfish were the most common resource, including abalone, turbans, mussels, clams, scallops, bubble shells, and others (Bean and Smith 1978:538-540).

HISTORIC SETTING

EARLY CALIFORNIA HISTORY

Juan Cabrillo was the first European to sail along the coast of California in 1542 and was followed in 1602 by Sebastian Vizcaino. Between 1769 and 1822 the Spanish had colonized California and established missions, presidios, and pueblos (Bean and Rawls 1993).

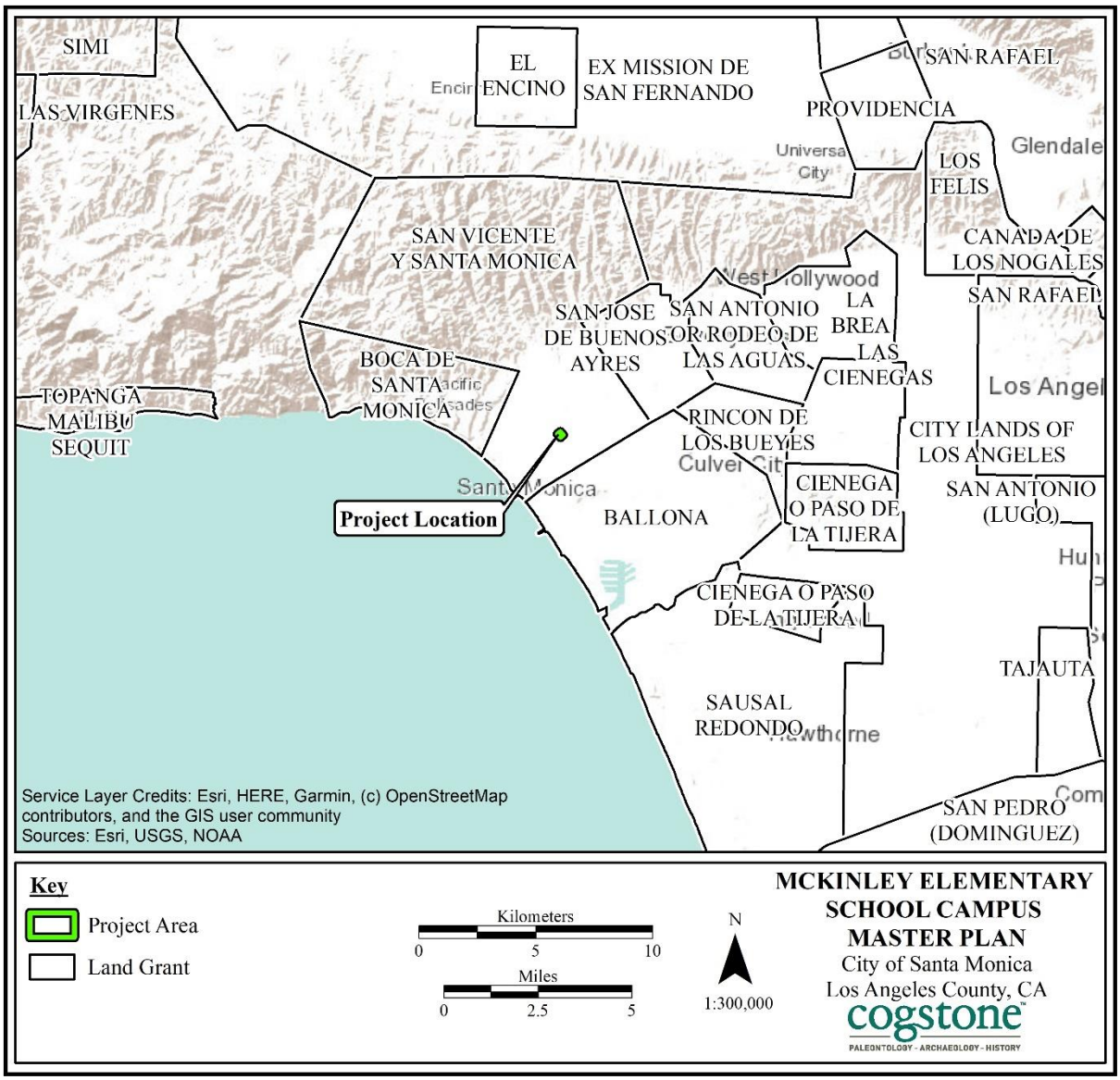

Figure 6. Land grant map

In 1821, Mexico won its independence from Spain and worked to lessen the wealth and power held by the missions. The Secularization Act was passed in 1833, giving the vast mission lands to the Mexican governor and downgrading the missions' status to that of parish churches. The governor then redistributed the former mission lands, in the form of grants, to private owners.

Ranchos in California numbered over 500 by 1846, all but approximately 30 of which resulted from land grants (Bean and Rawls 1993; Robinson 1948).

California was granted statehood in 1850 and although the United States promised to honor the land grants, the process of defining rancho boundaries and proving legal ownership became time consuming and expensive. Legal debts led to bankruptcies and the rise in prices of beef, hide, and tallow. This combined with flooding and drought was detrimental to the cattle industry. Ranchos were divided up and sold inexpensively (Robinson 1948).

The Project Area is located within the San Vicente Y Santa Monica land grant (Figure 6). The approximately 33,000-acre land grant was given to Francisco Sepulveda by Spanish California governor Juan Alvarado and covered what is today Santa Monica, Brentwood, Mandeville Canyon, and parts of West Los Angeles. However, the boundaries were in dispute throughout the Mexican Period and continued to be even after the Mexican-American War. Sepulveda's heirs were finally granted patent to the 30,260-acre Rancho San Vicente y Santa Monica in 1881.

PROJECT AREA HISTORY

A segment of the Pasadena and Pacific Railroad either passes through or runs immediately adjacent to the Project Area in the 1894 *Los Angeles* (1:62,500) USGS topographic quadrangle map. The 1921 *Santa Monica* (1:62500) USGS topographic quadrangle map shows a single building within the western corner of the Project Area, at what is now Chelsea Avenue and Santa Monica Boulevard. A school is present within the Project Area but the building in the west corner is no longer extant on the 1925 *Sawtelle* (1:24000) USGS topographic quadrangle map. The main school building has been expanded on the 1934 *Sawtelle* (1:24,000) USGS topographic quadrangle map. The northern portion of the campus is still a vacant field in the 1938 USDA historical aerial photograph (Framefinder 1938). The field in the northeast portion of the Project Area shows some signs of development for open air sports in the 1941 USDA aerial photograph (FrameFinder 1941). The school is identified as "McKinley Sch" on the 1950 (*Beverly Hills* 1:24000) USGS topographic quadrangle map. An additional building is added to the campus and further expansion is shown on the 1963 and 1966 *Beverly Hills* (both 1:24,000) USGS topographic quadrangle maps respectively. An additional building is present in the western corner of the Project Area on the 1991 *Beverly Hills* (1:24000) USGS topographic quadrangle map. A large building was constructed near the southwest corner of the Project Area between when the 1947 and 1952 USDA aerial photographs were taken (NETROnline 1947, 1952). Another large building was constructed within the Project Area at the corner of Chelsea Avenue and Santa Monica Boulevard between when the 1972 and 1980 USDA aerial photographs were taken (NETROnline 1972, 1980). The northeast portion of the Project Area has been paved in the 1989 historical aerial photograph (NETROnline 1989) and three portable classrooms are visible along the western boundary in the 1993 USDA aerial photograph (NETROnline 1993). A total of six portable classrooms are present at the western boundary of the Project Area in the 1995 USDA aerial photograph (NETROnline 1995). One moderately sized building and one

small building is constructed near the center of the campus between when the 2000 and 2003 USDA aerial photographs were taken (NETROnline 2000; 2003).

RECORDS SEARCHES

PALEONTOLOGICAL RECORD SEARCH

A record search of the Project was obtained from the Natural History Museum of Los Angeles County (LACM; Bell 2022; Appendix B). Additional records from the University of California Museum of Paleontology database (UCMP 2022), the PaleoBiology Database (PBDB 2022), and print sources were also reviewed for fossil records near to the Project (Table 4).

The Natural History Museum of Los Angeles County did not report any fossil localities from the Project, however they did list two Pleistocene localities within two miles of the Project in Santa Monica that produced ground sloth ([1]†*Paramylodon* sp.), horse (†*Equus* sp.), and American lion (†*Felis atrox*). Approximately five miles east in Culver City, seven localities were found during excavations for the Outfall Sewer in the 1920s. Mastodon (†*Mammut* sp.), horse (†*Equus* sp., †Equidae?), camel (†*Camelops* sp.), bison (†*Bison antiquus*), deer (*Odocoileus* sp.), sabre-toothed cat (†*Smilodon* sp.), and Bottae's pocket gopher (*Thomomys bottae*) were recovered (Jefferson 1991; McLeod 2015). Three other localities in Culver City and Westchester produced horse (†*Equus* sp.), camel (†*Camelops* sp.), mammoth (†*Mammuthus* sp.), and mastodon (†cf. *Mammut* sp.; Bell 2022; Hay 1927; Jefferson 1991; McLeod 2018, 2015; Miller 1971;).

[1] Extinct animals are noted by †.

Table 4. Fossils in Vicinity of the Project

Common Name	Taxon	Depth below original surface	Formation mapped at the surface	Age/ dates	Locality	Location	Reference
American lion	†*Felis atrox*	6 feet	younger alluvial fan (Qya)	Pleistocene	LACM 5462	South of Olympic Blvd. on Michigan Ave. east of Cloverfield Blvd., Santa Monica	Bell 2022
ground sloth	†*Paramylodon* sp.	>11 feet	younger alluvial fan (Qya)	Pleistocene	LACM 7879	Santa Monica, near Rose Ave. and Penmar Ave.	Bell 2022
horse	†*Equus* sp.						
Bison	†*Bison* sp.	16 feet	older alluvium (Qoe)	Pleistocene	LACM 4942	Southeast corner of Airport Blvd. and Manchester Ave.	Bell 2022
mammoth	† *Mammuthus* sp.						
hare	*Lepus*						
elephant	† Proboscidea	25 feet	Qoe	Pleistocene	LACM 3264	Los Angeles International Airport, Tom Bradley International Terminal	Bell 2022
mastodon	†cf. *Mammut*	13.5 feet	older alluvial fan (Qoa)	Pleistocene	LACM 1180	Manchester Ave. and Airport Blvd., Westchester	Miller 1971
horse	†*Equus* sp.	unknown	younger alluvial fan (Qya)	Pleistocene	unlisted	Culver City East	Hay 1927
camel	†*Camelops* sp.						
camel	†*Camelops* sp.	shallow but unknown	younger alluvial fan (Qya)	Pleistocene	LACM 3366	Outfall Sewer at Exposition Blvd, Culver City	Jefferson 1991, McLeod 2015
mastodon	†*Mammut* sp.	shallow but unknown	younger alluvial fan (Qya)	Pleistocene	LACM 3367	Outfall Sewer at Rodeo, Culver City	Jefferson 1991, McLeod 2015
horse	†*Equus* sp.	shallow but unknown	younger alluvial fan (Qya)	Pleistocene	LACM 3368	Outfall Sewer Section 15, Sentous Ave. east of Ballona Creek, Culver City	Jefferson 1991
horse	†Equidae?	shallow but unknown	younger alluvial fan (Qya)	Pleistocene	LACM 3369	Outfall Sewer Section 10, Culver City	Jefferson 1991, McLeod 2015
saber-toothed cat	†*Smilodon* sp.	shallow but unknown	younger alluvial fan (Qya)	Pleistocene	LACM 3370	Outfall Sewer saber-tooth, Culver City	Jefferson 1991, McLeod 2015
antique bison	†*Bison antiquus*	shallow but unknown	younger alluvial fan (Qya)	late Pleistocene	LACM 3371	Outfall Sewer Trench 19, Culver City	Jefferson 1991
horse	†*Equus* sp.	shallow but unknown	younger alluvial fan (Qya)	late Pleistocene	LACM 3372	Outfall Sewer, Culver City	McLeod 2015
camel	†*Camelops* sp.						
deer	*Odocoileus* sp.						
antique bison	†*Bison antiquus*						

Common Name	Taxon	Depth below original surface	Formation mapped at the surface	Age/ dates	Locality	Location	Reference
Bottae's pocket gopher	*Thomomys bottae*						
mammoth	†*Mammuthus* sp.	unknown	younger alluvial fan (Qya)	Pleistocene	LACM 4250	Near Jacob St. and Sentry Ave., west of Ballona Creek Culver City	McLeod 2015
ground sloth	†*Paramylodon* sp.	>11 feet	younger alluvial fan (Qya)	Pleistocene	LACM 7879	Near Rose Ave. and Penmar Ave., Santa Monica	McLeod 2018
horse	†*Equus* sp.						

Extinct animals are noted by †.

CALIFORNIA HISTORIC RESOURCES INFORMATION SYSTEM

Cogstone requested a search of the California Historical Resources Information System (CHRIS) from the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton on February 4, 2022 which included the entire proposed Project Area as well as a half-mile radius. Results of the record search indicate that no previous studies have been completed within the Project Area while an additional 14 studies have been completed previously within a half-mile radius of the Project Area (Table 5).

Table 5. Previous Studies within a half-mile radius of the Project Area

Report No. (LA-)	Author(s)	Title	Year	Distance (miles) from Project Area
01975	Neuenschwander, Neal J.	Cultural Resource Survey and Clearance Report for the Proposed American Telephone and Telegraph Los Angeles Airport Central Office to the Santa Monica Central Office Fiberoptic Communication Route	1989	0-0.25
03872	McLean, Deborah K.	Archaeological Assessment for Pacific Bell Mobile Services, Telecommunications Facility La-268-02, 2419 Michigan Ave., City of Santa Monica, Los Angeles County, Ca.	1998	0-0.25
06126	Maki, Mary K.	Acquisition of Two Parcels for the Future Demolition of Two Commercial Structures Located at 2601-2615 Santa Monica Boulevard Santa Monica	2002	0-0.25
06498	McKenna, Jeanette A.	Highway Project Involving Upgrading of Intersection Within the City of Santa Monica Located Between San Vicente Blvd. (north); Ocean Park (south); 9th Street (west); and 30th Street (east)	2002	0-0.25
06506	Duke, Curt	Cultural Resource Assessment for AT&T Wireless Services Facility Number, R322.1 County of Los Angeles, California	2000	0.25-0.5
06884	Harper, Caprice D.	Cultural Resource Assessment Cingular Wireless Facility No. Sm 250-01 Santa Monica, Los Angeles County, California	2003	0.25-0.5
07248	McKenna, Jeanette A.	A Cultural Resources Investigation and Architectural Evaluation of the Property Located at 1253 18th St., Santa Monica, Los Angeles County, California	2005	0.25-0.5
09453	Ehringer, Candice and Monica Strauss	Exposition Corridor Transit Project Phase 2 Archaeological Survey Report	2009	0.25-0.5
11005	Unknown, Mr./Mrs.	Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report	2010	0-0.25
11114	Foster, John M.	Archaeological Investigation, Partial Inventory Secondary Sewer Renewal Program Bundy and San Vicente Project	2011	0.25-0.5
11184	Born, Monica	Exposition Corridor Project Phase 2 (FTA 070320A), Request for Concurrence--Detailed Reconnaissance Survey	2008	0.25-0.5

Report No. (LA-)	Author(s)	Title	Year	Distance (miles) from Project Area
11305	Meiser, M.K.	Historical Resources Evaluation Report for the Exposition Corridor Transit Project Phase 2, Los Angeles County, California	2009	0.25-0.5
11793	Meiser, M.K.	Addendum to the Historical Resources Evaluation Report and Archeological Survey Report for Project Changes and Design Options the Exposition Corridor Transit Project Phase 2, Los Angeles County, California	2009	0.25-0.5
11908	McKenna, Jeanette	A Phase I Cultural Resources Investigation and Architectural Evaluation of the 1802 Santa Monica Boulevard Mixed Use Project Area in the City of Santa Monica, Los Angeles County, California	2012	0.25-0.5

Two cultural resources have been recorded within the Project Area (P-19-188708 and P-19-188709; Table 6). Outside of the Project Area a total of three cultural resources have been previously documented within the search radius from the Project Area. These consist of three cultural resources within a quarter- to half-mile of the Project Area (Table 6).

Table 6. Previously Recorded Cultural Resources within a half mile radius of the Project Area

Primary No. (P-19-)	Trinomial No. (CA-LAN-)	Resource Type	Resource Description	Year Recorded	Distance (miles) From Project Area	NRHP/CRHR Status
003803	003803H	Historic Archaeological Site	Santa Monica Air Line Segment. 6-mile segment of Southern Pacific Railroad right-of-way, 1875	2008	0.25-0.5	NR Eligible: Criterion A
004666	004666H	Historic Archaeological Site	Refuse deposit comprised of one rusted, metal folding chair, one intact, 4 oz. glass instant coffee jar, a broken, unglazed terra cotta pipe, a brick wall or collar segment, concrete, fragments of glass and 2,000+ standard size, red, unmarked bricks, 1960s	2012	0.25-0.5	Unevaluated
188708		Historic Built Environment	Santa Monica Public Schools Thematic District, 1924.	1993	Within	NR Eligible: Criterion A, and Criterion C

Primary No. (P-19-)	Trinomial No. (CA-LAN-)	Resource Type	Resource Description	Year Recorded	Distance (miles) From Project Area	NRHP/CR HR Status
188709		Historic Built Environment	McKinley Grammar School, 2401 Santa Monica Boulevard. Spanish Colonial Revival style, 1922	1993	Within	NR Eligible: 5D3 and Criterion A.1
189756		Historic Built Environment	Single Family Residence. 1625 20th St. Spanish Eclectic, constructed 1927 and relocated 1954.	2008	0.25-0.5	NR Not Eligible; CR: Not Evaluated

P-19-188708

The Santa Monica Public Schools Thematic District (P-19-188708) was recorded by Leslie Heumann and Associates in 1993 as a historic district consisting of six Santa Monica Public Schools. Those schools are: McKinley School (2401 Santa Monica Boulevard), Franklin School (2400 Montana Avenue), Madison School (1018 Arizona Avenue), Roosevelt School (801 Montana Avenue), John Adams Junior High School (2355-2417 17th Street), and Grant School (2400 Pearl Street). Five of the campuses reflect the influence of the PWA Moderne style and the other retains its original Spanish Colonial Revival style. The District period of significance dates range between 1875 to 1943 when the schools were built and/or remodeled after serious earthquake damage occurred at each school site. These six schools represent the historic character of school design in Santa Monica. Each has been a focal point of their respective neighborhoods since the late 1930s or earlier. All have associations with architects of note as well as with thousands of past and present residents (Heumann 1993a).

P-19-188709

P-19-188709 was recorded by Leslie Heumann and Associates in 1992 as a contributing resource to the Santa Monica Public Schools Thematic District. McKinley School was built in 1922 and is described as a two-story school designed in the Spanish Colonial Revival style. Later additions were made in 1924 and 1936 following updated earthquake standards. The resource was originally recorded in the Historic Resources Inventory with a prior evaluation of 5D1 (Heumann 1993b). Subsequent evaluation in 2007 by Jones and Stokes recommended it eligible for the National Register of Historic Places under Criterion A.1 as it "contributes to a district that exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City. (Jones and Stokes 2007).

OTHER SOURCES

In addition to the SCCIC records search, a variety of sources were consulted in February 2022 to obtain information regarding the cultural context of the Project vicinity (Table 7). Sources included the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), Built Environment Resource Directory (BERD), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). Specific information about the Project Area, obtained from historic-era maps and aerial photographs, is presented in the Project Area History section.

Table 7. Other Sources

Source	Results
National Register of Historic Places (NRHP)	Negative
Historic USGS Topographic Maps	see Project Area History section
Historic US Department of Agriculture Aerial Photographs	see Project Area History section
Built Environment Resource Directory (BERD)	Negative
California Historical Landmarks (CHL)	Negative
California Points of Historical Interest (CPHI)	Negative
Bureau of Land Management (BLM) General Land Office Records	Positive; Ramona, Sepulveda (Accession No. CACAAA 074985; Issued: 7/23/1881; Authority Grant-Spanish/Mexican

NATIVE AMERICAN CONSULTATION

Cogstone archaeologist Logan Freeberg submitted a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC) on February 4, 2022. The NAHC responded on March 24, 2022 and indicated that there sacred lands or resources known within the same USGS Quadrangle, Township, Range, and Section as the Project Area (Appendix C) and to contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians for more information. The NAHC also provided a list of Native American individuals/organizations that may have knowledge of cultural resources and/or sacred lands within or near the Project. The Santa Monica-Malibu Unified School District is responsible for Native American consultations as required by Assembly Bill (AB) 52.

Gabrieleno/Tongva San Gabriel Band of Mission Indians were contacted via United States Postal service certified mail on June 29, 2022. No response has been received.

SURVEY

METHODS

The survey stage is important in a Project's environmental assessment phase to verify the exact location of each identified cultural resource, the condition or integrity of the resource, and the proximity of the resource to areas of cultural resources sensitivity. All undeveloped ground surface areas within the ground disturbance portion of the Project Area were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Existing ground disturbances (e.g., cutbanks, ditches, animal burrows, etc.) were visually inspected. Photographs of the Project Area, including ground surface visibility and items of interest, were taken with a digital camera.

RESULTS

Cogstone archaeologist and cross-trained paleontologist Sandy Duarte surveyed the Project Area on May 4, 2022. While on the premises Ms. Duarte was escorted by Construction Supervisor Jason Dodd from Facility Improvement Projects Santa Monica Malibu Unified School District (SMMUSD). Due to the highly developed Project Area, the pedestrian survey consisted of 10-meter wide transects (Figure 7). Ground visibility within the Project Area was very poor (less than 2 percent) due to hardscaping and landscaping (Figure 8). All exposed areas with alluvial fans had been hardscaped and landscaped.

Figure 7. Courtyard, view to the west

Figure 8. Open grassy play area, view to the northwest.

STUDY FINDINGS AND CONCLUSIONS

ARCHAEOLOGICAL SENSITIVITY

Based on the cultural resources record search results, negative pedestrian survey, and review of historic USGS topographic quadrangle maps and USDA historic aerial photographs, the potential for buried historic archaeological resources within the Project Area is low. These sources also indicate that the potential for buried prehistoric deposits is low. The NAHC however indicated that there is a sacred site within the same township, range, and section as the McKinley campus. As such, the potential for buried prehistoric cultural resources is currently assessed to be low to moderate but may be adjusted pending specific information about the location of the sacred site on record with the NAHC.

PALEONTOLOGICAL SENSITIVITY

A multilevel ranking system was developed by professional resource managers within the Bureau of Land Management (BLM) as a practical tool to assess the sensitivity of sediments for fossils. The Potential Fossil Yield Classification (PFYC) system (BLM 2016; Appendix D) has a multi-level scale based on demonstrated yield of fossils. The PFYC system provides additional guidance regarding assessment and management for different fossil yield rankings.

Fossil resources occur in geologic units (e.g., formations or members). The probability for finding significant fossils in a Project Area can be broadly predicted from previous records of fossils recovered from the geologic units present in and/or adjacent to the study area. The geological setting and the number of known fossil localities help determine the paleontological sensitivity according to PFYC criteria

All alluvial deposits may increase or decrease in fossiliferous potential depending on how coarse the sediments are. Sediments that are close to their basement rock source are typically coarse; those farther from the basement rock source are finer. The chance of fossils being preserved greatly increases once the average size of the sediment particles is reduced to 5 mm or less in diameter. Moreover, fossil preservation also greatly increases with rapid burial in flood-plains, rivers, lakes, oceans, etc. Remains left on the ground surface become weathered by the sun or consumed by scavengers and bacterial activity, usually within 20 years or less. So the sands, silts, and clays of flood-plains, rivers, lakes, and oceans are the most likely sediments to contain fossils.

Using the PFYC system, geologic units are classified according to the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts within the known extent of the geological unit. Although significant localities

may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher PFYC value; instead, the relative abundance of localities is intended to be the major determinant for the value assignment.

The Project is mapped as middle to late Pleistocene older alluvium and late Pleistocene to Holocene young alluvium. A records search revealed that all of the fossils previously recovered within a 10-mile radius were a minimum of six to 11 feet deep in deposits mapped as Pleistocene at the surface. Sediments with a Holocene component produced fossils starting at 24 feet deep. As such the older alluvium less than five feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Older alluvium sediments more than five feet below the modern surface are assigned a moderate potential (PFYC 3). Young alluvium deposits less than 20 feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. The young alluvium deposits more than 20 feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to similar deposits producing fossils at that depth near to the study area. Artificial fill has very low potential for fossils (PFYC 1; Table 8).

Table 8. Paleontological Sensitivity Rankings

Rock Unit	PFYC rankings				
	5 very high	**4 high**	**3 moderate**	**2 low**	**1 very low**
older alluvium, middle to late Pleistocene			more than 5 feet deep	less than 5 feet deep	
young alluvium, late Pleistocene to Holocene			more than 20 feet deep	less than 20 feet deep	
Artificial fill, modern					X

RECOMMENDATIONS

ARCHAEOLOGICAL RESOURCES

As sensitivity for buried archaeological resources ranges from low to moderate, no cultural resources monitoring is recommended at this time. A Worker Environmental Awareness Program (WEAP) should be developed by a qualified archaeologist and presented to all personnel who engage in earthwork as well as their supervisors, detailing what cultural resources maybe found in the area. Plans to alter currently undeveloped portions of the McKinley Elementary School campus may proceed without additional conditions.

In the event of an unanticipated discovery, all work must be suspended within 50 feet of the find until a qualified archaeologist evaluates it. In the unlikely event that human remains are encountered during Project development, all work must cease near the find immediately.

In accordance with California Health and Safety Code Section 7050.5, the County Coroner must be notified if potentially human bone is discovered. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with Public Resources Code Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods. Work may not resume in the vicinity of the find until all requirements of the health and safety code have been met.

PALEONTOLOGICAL RESOURCES

The Project is mapped as middle to late Pleistocene older alluvium and late Pleistocene to Holocene young alluvium. The record search revealed no fossil localities from within the Project; however, localities are known from the similar sediments as found within the study area near to the Project.

A records search revealed that all of the fossils previously recovered within a 10-mile radius were a minimum of six to 11 feet deep in deposits mapped as Pleistocene at the surface. Sediments with a Holocene component produced fossils starting at 24 feet deep. As such the older alluvium less than five feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. Older alluvium sediments more than five feet below the modern surface are assigned a moderate potential (PFYC 3). Young alluvium deposits less than 20 feet below the modern surface are assigned a low potential for fossils (PFYC 2) due to the lack of fossils in these deposits. The young alluvium deposits more than 20 feet below the modern surface are assigned a moderate potential for fossils (PFYC 3) due to similar deposits producing fossils at that depth near to the study area. Artificial fill has very low potential for fossils (PFYC 1).

Based on fossils found in similar sediments nearby, paleontological monitoring is currently recommended for mass excavations into native sediments of the older alluvium below a depth of five feet and native sediments of the young alluvium below a depth of 20 feet. Drilling or pile driving activities, regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling will not have

information about formation, depth or context. The only instance in which such fossils will meet significance criteria is if the fossil is a species new to the region.

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APPENDIX A. QUALIFICATIONS

cogstone
PALEONTOLOGY - ARCHAEOLOGY - HISTORY

MOLLY VALASIK
QA/QC

EDUCATION

2009 M.A., Anthropology, Kent State University, Kent, Ohio
2006 B.A., Anthropology, Ohio State University, Columbus, Ohio

SUMMARY QUALIFICATIONS

Ms. Valasik is a Registered Professional Archaeologist (RPA) with more than 13 years of experience. She is a skilled professional who is well-versed in the compliance procedures of CEQA and Section 106 of the NHPA and regularly prepares cultural resources assessment reports for a variety of federal, state, and local agencies throughout California. Ms. Valasik has managed a variety of projects at Cogstone in the water, transportation, energy, development, and federal sectors. She meets the qualifications required by the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation*. She is accepted as a principal investigator for prehistoric archaeology by the State Office of Historic Preservation's Information Centers.

SELECTED EXPERIENCE

Brea 265 Specific Plan, City of Brea, Orange County, CA. The objective of this study was to review and summarize available information regarding known paleontological, archaeological, and historical resources within the boundaries of the proposed Specific Plan. This study provided environmental documentation as required by CEQA. A Paleontological Resource Impact Mitigation Program and full-time monitoring was recommended. Due to the high sensitivity for subsurface archaeological resources, a cultural resources mitigation plan and monitoring was also recommended. Sub to Placeworks. Project Manager and Principal Investigator for Archaeology. 2018-2019

La Verne General Plan Update, City of La Verne, Los Angeles County, CA. Cogstone reviewed and summarized available information regarding known paleontological, archaeological, and historical resources within the boundaries of the City of La Verne to support an update of the City's General Plan. Cogstone conducted archaeological and paleontological record searches, extensive historical research at City Hall, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC), and a general analysis of impacts of future projects within the city that may adversely affect paleontological, archaeological, or historic resources was provided along with mitigation recommendations. Sub to De Novo. Principal Investigator for Archaeology. 2018

Whittier Boulevard/Three Intersection Improvements, City of Whittier, Los Angeles County, CA. Cogstone conducted intensive-level cultural resources surveys and prepared technical studies for improvements proposed for three intersections at Colima Road, Santa Fe Springs Road and Painter Avenue in a disturbed urban environment. Managed records search, Sacred Lands search, NAHC consultation, and APE mapping. Sub to Michael Baker. Principal Investigator. 2016-2018

Reseda Skate Facility Project, City of Los Angeles, Los Angeles County, CA. Cogstone was retained to conduct an archaeological assessment to determine the potential effects to archaeological resources resulting from construction of an ice rink, roller rink, and associated parking lot. Services included a records search, intensive-level pedestrian survey, and archaeological assessment report that determined the potential of disturbance to archaeological resources was low. *This project was a task order from an on-call contract with Los Angeles Bureau of Engineering.* Sub to ICF. Principal Investigator. 2017

SR-138 Palmdale Boulevard, Caltrans District 8, City of Palmdale, Los Angeles County, CA. The project involved widening and modifying three southbound lanes on Sierra Highway to Avenue R at the railroad crossing. Conducted a cultural resources assessment to support the Project environmental documents (IS/MND) in compliance with NEPA and CEQA. Services for this Local Assistance Project, on behalf of the City, included records search, Sacred Lands File search, Tribal consultation, intensive-level field survey, finalization of the APE map in concurrence with Caltrans District 7, and preparation of an ASR technical report. Sub to Parsons. Principal Archaeologist. 2015-2016

cogstone
PALEONTOLOGY - ARCHAEOLOGY - HISTORY

ERIC SCOTT
Paleontology QAQC

EDUCATION

1990 M.A., Anthropology (Biological), University of California, Los Angeles
1985 B.A., Anthropology (Physical), California State University, Northridge

SUMMARY QUALIFICATIONS

Mr. Scott is a professional vertebrate paleontologist with over four decades of experience in paleontological mitigation, fieldwork, curation, and research. He is emeritus paleontology curator at the San Bernardino County Museum, an adjunct instructor at California State University, San Bernardino, and a research associate of the Natural History Museum of Los Angeles County and the La Brea Tar Pits and Museum. He is a 30+ year member of the Society of Vertebrate Paleontology, an international society of professional scientists where he currently serves on the Government Affairs Committee, and also holds membership in the Geological Society of America and other professional societies. Eric currently serves as an editor for the Journal of Vertebrate Paleontology. He has published over 40 research articles in professional scientific journals.

SELECTED PROJECTS

Purple Line Extension (Westside Subway), Section 1, Metropolitan Transit Authority (METRO), Los Angeles, CA. The project involves construction of seven stations from the existing Purple Line at Wilshire/Western Avenue along Wilshire Boulevard to the Veterans Administration Hospital in Westwood for 8.6 miles. Supervises paleontological monitoring, fossil recovery, and fossil preparation in the lab. Contributes to monthly reporting. Sub to JV West. Paleontologist. 2017-ongoing

Highway 111 Street Improvement Project, City of Indio, Riverside County, CA. In compliance with mitigation measures, Cogstone provided paleontological resources monitoring during the excavation and grading of a ~1.7-mile stretch of highway on a full-time basis for sediments five feet or more below the original ground surface. This project received Federal funding and this report has been produced in compliance with the National Environmental Policy Act (NEPA). Sub to ECORP Consulting. Project Manager and Report Author. 2018

Camino de la Cumbre Project, City of Sherman Oaks, Los Angeles County, CA. The purpose of this Paleontological Resources Assessment is to determine the potential for impacting fossil resources during excavations of the Camino de la Cumbre residential development project. Managed survey and prepared Paleontological Resources Assessment Report. Sub to Ridge, Inc. Qualified Principal Paleontologist and Author. 2018

Charcot Avenue Extension Over I-880 Project, Caltrans District 4, City of San Jose, Santa Clara County, CA. Cogstone produced a Paleontological Identification Report (PIR) to assess the potential for impacting fossil resources during the proposed construction of a two-lane extension. Cogstone consulted published literature and records for fossil localities within a one-mile radius of the project. Non-auguring excavations into native sediments were expected to be fairly minimal for embankments, utilities, and signal and lighting pole foundations. Due to the limited amount of excavations more than 10 feet deep, it was considered unlikely that fossils meeting significance criteria will be encountered on this project; therefore, no mitigation was recommended. Sub to David J. Powers. Qualified Principal Paleontologist and Author. 2018

Ava Hollywood Mixed Use High-Rise Project, City of Los Angeles, Los Angeles County, CA. This project was conducted in compliance with the Mitigation Measure as defined by the Los Angeles Department of City Planning. Cogstone provided paleontological monitoring during the excavation and grading for a seven-story building with two levels of underground parking on a full-time basis for sediments five feet or more below the original ground surface. Project Manager and Author. 2018

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PALEONTOLOGY - ARCHAEOLOGY - HISTORY

JOHN GUST
Principal Investigator for Archaeology and Task Manager

EDUCATION

2016 Ph.D., Department of Anthropology, University of California, Riverside (UCR)
2011 M.A., Department of Anthropology, UCR
2007 M.A., Applied Geography, University of Colorado, Colorado Springs (UCCS)
2002 B.A., Department of Anthropology, minor in Geography/Environmental Studies, UCCS

SUMMARY QUALIFICATIONS

Dr. Gust is a Registered Professional Archaeologist (RPA) with over 10 years of experience in field archaeology. He meets the qualifications required by the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* and his field expertise includes pedestrian surveys, excavation monitoring, resource recording, and historic artifact analysis. Dr. Gust has managed cultural assessments for over 20 cellular tower projects and multiple assessments for construction of commercial and residential structures. He has also managed cultural resources monitoring projects for both public and private sector clients. Dr. Gust is a member of the Society for California Archaeology, Society for American Archaeology, and the American Anthropological Association.

SELECTED EXPERIENCE

Dogwood Road Project, City of El Centro, Imperial County, CA. Cogstone conducted a cultural resources assessment to determine the potential effects to cultural resources resulting from the construction of United States Department of Agriculture (USDA) Part 70-B RD Funding assisted housing on a 2.2-acre parcel. Cogstone conducted a record search, pedestrian survey, and determined that no further cultural resources work was necessary. The assessment provided environmental documentation as required by Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA). The City of El Centro acted as the lead agency. Sub to Partner Science & Engineering, Inc. Principal Investigator for Archaeology. 2019-2020

Euclid Fueling Station Project, City of Santa Ana, Orange County, CA. Cogstone conducted a cultural resources assessment to determine the potential impacts to cultural and paleontological resources during the construction of a convenience store, associated parking, gas station, and underground fuel storage tank. The assessment was conducted to meet the requirements of CEQA with the City of Santa Ana acting as lead agency. Cogstone conducted record searches, a Sacred Lands File Search, an intensive pedestrian survey, gave mitigation recommendations, and produced a report. Sub to Sagecrest Planning + Environmental. Principal Investigator for Archaeology. 2019

Jackson St HUD 58 EA Project, City of Riverside, Riverside County, CA. Cogstone conducted a cultural resources assessment to determine the potential effects to cultural resources resulting from the construction of United States Department of Housing and Urban Development (HUD) assisted housing on a 3.58-acre parcel. This assessment provided environmental documentation as required by Section 106 of the National Historic Preservation Act (NHPA). The City of Riverside was the lead agency. Cogstone conducted a records search, a Sacred Lands File Search, a pedestrian survey, and produced a report. Sub to Partner Science & Engineering. Principal Investigator for Archaeology and Report Author. 2019

Heathercliff Malibu Development Project, City of Malibu, Los Angeles County, CA. Cogstone conducted a study to determine the potential impacts to cultural resources resulting from the construction of a single residence bounded by Heathercliff Road to the southeast and the Pacific Coast Highway to the northwest. This study included all information required by the City of Malibu Archaeology Guidelines. Cogstone conducted a record search, Sacred Lands File Search, pedestrian survey, and produced an assessment. Sub to ACS Construction. Principal Investigator for Archaeology and Report Author. 2019.

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PALEONTOLOGY - ARCHAEOLOGY - HISTORY

KIM SCOTT
Principal Investigator for Paleontology

EDUCATION

2013 M.S., Biology with a paleontology emphasis, California State University, San Bernardino
2000 B.S., Geology with paleontology emphasis, University of California, Los Angeles

SUMMARY QUALIFICATIONS

Ms. Scott has more than 26 years of experience in California paleontology. She is a sedimentary geologist and qualified paleontologist with extensive experience. She is a skilled professional who is well-versed in the compliance procedures of CEQA, NEPA, and the Paleontological Resources Preservation Act (PRPA). Ms. Scott regularly prepares reports for paleontological assessments, mitigation and monitoring plans and measures, and monitoring reports for a variety of federal, state, and local agencies throughout California. In addition, she has prepared paleontological resources reports for CEQA/ EIR compliance documents for Project-level and program-level Specific Plans, General Plans, Master Plans, and Zoning Amendments for mixed-use, residential, commercial and industrial developments. Ms. Scott serves as company safety officer.

SELECTED PROJECTS

Purple Line Extension (Westside Subway), Metro/FTA, Los Angeles, CA. The Project involves extension of the subway from Wilshire/Western to the VA Facility in Westwood for 9 miles. Cogstone prepared the supplemental Archaeology and Architectural History Reports and the cultural and paleontological sections of the FEIS/FEIR. Cogstone subsequently prepared the cultural and paleontological mitigation and monitoring plans for the entire Project. Currently providing monitoring and all other cultural and paleontological services for Section One of the Project. Paleontological Field and Lab Director, Report Co-author. 2011-present

Barren Ridge Transmission Line, Los Angeles Department of Water and Power (LADWP), Saugus to Mojave, Los Angeles and Kern Counties, CA. Over 75 miles of LADWP electrical lines were installed Angeles National Forest, BLM and private lands. Supervised paleontological monitoring and lab work and prepared a Paleontological Monitoring Report to CEQA, BLM, and PRPA standards. Sub to Aspen Environmental Group. Principal Paleontologist. 2015-present

City of La Verne General Plan, Los Angeles County, CA. The Project was for an update to the City's General Plan, a 5,446-acre area. Provided a Paleontological and Cultural Assessment Report for the City. Sub to De Novo Planning Group. Principal Paleontologist. 2018

Interstate 405 Paleontological Resources Mitigation Plan, Los Angeles and Orange Counties, CA. Improvements to a 6-miles of Interstate 405 (I-405) between State Route 73 and Interstate 605. Provided a Paleontological Mitigation and Monitoring Plan. Principal Paleontologist. Sub to OC 405 Partners. 2018

Little Tujunga Canyon Bridge, Angeles National Forest, Los Angeles County, CA. The Project was to replace the Little Tujunga Canyon Road Bridge along Little Tujunga Canyon Road. Provided a Paleontological Assessment Report. Sub to Michael Baker International. Principal Paleontologist. 2017

Park Place Extension Project, City of El Segundo, Los Angeles County, CA. The City proposed to extend Park Place from Allied Way to Nash Street with a railroad grade separation to implement a critical Project improving traffic and circulation in the Project Area. Provided a combined Paleontological Identification and Evaluation Report (PIR/PER). Sub to Michael Baker International. Principal Paleontologist. 2017

Coto de Caza EIR Subdivision, Coto de Caza, Orange County, CA. The project proposed the subdivision of an existing large estate for development of 28 new residential lots on approximately 50-57 acres of land. Proposed residential lots will be a minimum of one acre in size. Prepared a Paleontological Assessment Report. Contracted to Bill Lyon. Co-Principal Paleontologist/Report Co-author. 2015

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PALEONTOLOGY - ARCHAEOLOGY - HISTORY

SANDY DUARTE
Archaeologist and Co-Author

EDUCATION

2002 B.A., Cultural Anthropology, University of California, Santa Barbara

TRAINING AND CERTIFICATIONS

HAZWOPER Certified - Certified American Red Cross CPR; Certified American Red Cross Standard First Aid
Applied Archaeology of Southern California, USDA Forest Service, San Bernardino National Forest
Railroad Security Certified

SUMMARY QUALIFICATIONS

Mrs. Duarte is a paleontologist and archaeologist with over 18 years of experience in paleontological and archaeological monitoring, surveying, and excavation in southern California. Mrs. Duarte has experience with Native American consultation as required by Section 106 of the National Historic Preservation Act (NHPA) and under Senate Bill 18 for the protection and management of cultural resources. Beginning in 2006, Mrs. Duarte worked for the U.S. Forest Service in the Biology, Timber, and Geology Department as an archaeologist, including serving as a trained wild-land firefighter to preserve archaeological sites forest fires. Additional skills include paleontological identification, fossil preparation, artifact identification and preparation, and final report preparation.

SELECTED PROJECTS

Parkside Estates, City of Huntington Beach, Orange County, CA. The project consisted of an approximately 50-acre development. Services included monitoring during all excavations, identifying and collecting cultural artifacts, and Native American coordination with Juaneño and Gabrielino groups. LSA Associates. March 2016-September 2019

State Route 74 Improvements, Caltrans District 12, Orange County, CA. This project consisted of the widening of SR-74 and adding a shoulder lane. Duties included monitoring the installation of ESA fencing along culturally sensitive areas along SR-74 and widening of shoulder lane. LSA Associates. Archaeological Monitor. April-June 2018

Perris Gateway Commerce Center, City of Perris, San Bernardino County, CA. The proposed project included the demolition of existing uses at the project site and the construction and operation of a 380,000 square-foot high-cube warehouse to be constructed on 21.63 acres, 0.27 acres of which would be provided for purposes of street dedication, and the remainder of the site to be developed with 205,000 square feet of landscaping, 225 passenger vehicle parking stalls, 98 trailer parking stalls, and two detention basins. Conducted monitoring during all ground disturbing activities. Archaeological Monitor. March 2018

La Pata Avenue 1.8-mile Gap Closure and Camino del Rio Extension, Orange County Public Works, City of San Juan Capistrano, Orange County, CA. This project was a massive undertaking of 14.8 million cubic yards of earth material being removed. Duties included identifying and collecting groundstone artifacts in alluvium, and identifying and collecting fossils in bedrock. Ms. Duarte also prepared numerous pinniped fossils specimens with zip scribes. LSA Associates. Lead Archaeological Monitor. March 2014 - March 2017

Planning Area 40 East/East Rough Grading and Pipeline Trenching, Cities of Lake Forest and Irvine, Orange County, CA. LSA conducted paleontological resources monitoring for the rough grading of PA 40 East/East for the development of a new residential community. Ms. Duarte served as paleontological and archeological monitor during all earth-disturbing activities on site. LSA Associates. January-April 2016

On-Call Environmental Mitigation Program, OCTA, Orange County, CA. This project consisted of 6 open space properties and 11 restoration Project Areas selected for mitigation of impacts from the Measure M2 freeway program. Prior to any work taking place, each area had to have an environmental assessment to determine the presence of both historic and prehistoric resources. Duties included leading transects using ArcGIS on a smartphone and assisting in identifying and recording artifacts. LSA Associates. Lead Archaeological Monitor. March-June 2014

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PALEONTOLOGY - ARCHAEOLOGY - HISTORY

KELLY VREELAND
Paleontologist and Co-Author

EDUCATION

2014 M.S., Geology, California State University, Fullerton (CSUF)
2010 B.S., Geology, CSUF

SUMMARY OF QUALIFICATIONS

Ms. Vreeland is a Paleontologist with over 10 years of experience in field paleontology. Her field and laboratory experience includes fieldwork and research projects throughout California and Nevada, as well as conducting fieldwork and surficial geologic mapping in Montana. Ms. Vreeland has expertise in invertebrate paleontology and paleoecology. Ms. Vreeland is a member of the Geological Society of America, the Paleontological Society, the Society for Sedimentary Geology, and the Association for Women in Geoscience.

SELECTED EXPERIENCE

Jack Ranch Tract, unincorporated area of San Luis Obispo County, CA. Cogstone prepared a Paleontological Mitigation Plan (PMP) to propose effective mitigation of potential adverse impacts to paleontological resources resulting from proposed construction of 13 residential lots as well as a Conditional Use Permit to allow for a Major Agricultural Cluster project. Cogstone is providing archaeological and paleontological monitoring during construction for residential development of a 299-acre parcel. The County of San Luis Obispo is the lead agency for this project under the California Environmental Quality Act. Sub to Kirk Consulting. Paleontology Supervisor. 2020-*present*

Five Point Community Development - Various Projects, City of Irvine, Orange County, CA. LSA Associates conducted paleontological and archaeological resources monitoring for various Five Point Community Development projects in Irvine as well as preparation of environmental documents. Paleontologist. 2015-2020

Alameda Corridor East Grade Separation Projects, various cities, Los Angeles County, CA. LSA Associates conducted on-call paleontological resource monitoring for various railway grade separation projects and preparation of Paleontological Mitigation Plans. Paleontologist. 2019-2020

South Campus Student Housing Project, City of Sacramento, Sacramento County, CA. LSA Associates prepared a Paleontological Resources Monitoring and Mitigation Plan as well as developed and conducting a Workers Environmental Awareness Program (WEAP) training. The project involved construction and operation of student housing facilities for upper-division university students adjacent to the California State University, Sacramento campus. Paleontologist. 2020

American Kings Solar Project, Kings County, CA. LSA Associates prepared a Paleontological Analysis for the proposed construction, operation, maintenance, and decommissioning of an up to 128-megawatt alternating current photovoltaic solar power-generating facility. Paleontologist. 2019

Teresina Project, City of Lake Forest, Orange County, CA. LSA Associates conducted paleontological and archaeological resources monitoring during grading for the development of a new residential community. Upon completion of the project, a Paleontological Resources Monitoring Report was prepared. Paleontologist. 2018

NBC Universal Project, City of Los Angeles, Los Angeles County, CA. LSA Associated prepared and conducted Worker Environmental Awareness Program (WEAP) training for all personnel on the project, as well as archaeological and paleontological resource monitoring for additional developments and improvements to the NBC Universal lot and associated roads. Paleontologist. 2018-2020

cogstone
PALEONTOLOGY - ARCHAEOLOGY - HISTORY

LOGAN FREEBERG
GIS Supervisor

EDUCATION

2018 Geographic Information Systems (GIS) Certificate, California State University, Fullerton
2003 B.A., Anthropology, University of California, Santa Barbara

SUMMARY QUALIFICATIONS

Mr. Freeberg has over 19 years of professional experience in cultural resource management, and has extensive experience in field surveying, data recovery, monitoring, and excavation of archaeological and paleontological resources associated with land development projects in the private and public sectors. He has conducted all phases of archaeological work, including fieldwork, laboratory analysis, research, and reporting. Mr. Freeberg also has a strong grounding in conventional field and laboratory methods and is skilled in the use of ArcGIS.

SELECTED PROJECTS

Laguna Creek Trail and Bruceville Road Project, Caltrans District 3, City of Elk Grove, Sacramento County, CA. The City of Elk Grove, in cooperation with Caltrans, proposed multiple trail extensions and gap closures in effort to provide connecting links that would ultimately provide trail users with access to a vast system of trails, with connections to parks, schools, community centers, commercial retail and office areas, and transit facilities. Cogstone conducted pedestrian surveys, records search, and prepared an Archaeological Survey Report (ASR) and a Historic Property Survey Report (HPSR). Sub to Helix Environmental. GIS Technician. 2019

Roosevelt Park Regional Stormwater Capture Project, unincorporated area of Florence-Firestone, Los Angeles County, CA. Conducted cultural and paleontological monitoring during all ground disturbing activities in native sediments. This project included the construction of three diversion structures and pipelines. Sub to Environmental Advisors. GIS Technician. 2019

Goddard School Project, City of Chino Hills, San Bernardino County, CA. Cogstone produced a paleontological resources mitigation and monitoring program for a proposed 59,129 square foot development that would consist of a one-story, 10,587-square foot pre-school/daycare with nine classrooms, fenced play yards and play structures, and a parking lot with 40 stalls. Cogstone put forward mitigation measures that included monitoring for all ground-breaking activities, paleontological resource awareness training for construction personnel, and the completion of a final mitigation report. GIS Technician. 2019

Euclid Fueling Station Project, City of Santa Ana, Orange County, CA. This study was conducted to determine the potential impacts to archaeological and paleontological resources during construction activities for a proposed 7-Eleven gas station and convenience store. The proposed project entailed the construction of the convenience store, associated parking, gas station, and underground fuel storage tank. Planned vertical impacts included approximately three to four feet of fill removal over at least some of the site, a trench approximately eight feet deep for utilities, and approximately 12 feet for the new fuel storage tanks. Sub to Sagecrest Environmental. GIS Technician. 2019

Fresno West Area Specific Plan, City of Fresno, Fresno County, CA. The objective of this study was to review and summarize available information regarding known paleontological, archaeological, and historical resources within the boundaries of the City of Fresno's West Area Specific Plan. The purpose of the West Area Specific Plan is to implement and refine the City's vision for the West Area in order to guide future growth and development in the most northwest area of the City. Cogstone's services included record searches, mapping, and extensive background research. Sub to De Novo Planning. GIS Technician. 2019

Laguna Beach Fire Department Fire Breaks, City of Laguna Beach, Orange County, CA. This project included the areas adjacent to homes and businesses requiring vegetation removal to create new fire breaks. Conducted a pedestrian survey of the natural landscape and slopes located along the eastern and western sides of the SR-133 highway, south of El Toro Road to Pacific Coast Highway. Archaeological Monitor. 2019

APPENDIX B. PALEONTOLOGICAL RECORD SEARCH

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

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

February 13, 2022

Cogstone Resource Management
Attn: Logan Freeberg

re: Paleontological resources for the McKinley Elementary School Campus Master Plan Project (Cogstone #5421)

Dear Logan:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the Grant Elementary School Master Plan project area as outlined on the portion of the Beverly Hills USGS topographic quadrangle map that you sent to me via e-mail on February 4, 2022. We do not have any fossil localities that lie directly within the proposed project area, but we do have fossil localities nearby from the same sedimentary deposits that occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM VP 5462	2500 block of Michigan Ave, Santa Monica	Unknown formation (Pleistocene)	American lion (*Felis atrox*)	6 feet bgs
LACM IP 4749	SW of the intersection of Olympic Blvd and 4th St; Santa Monica	Unknown formation (Pleistocene)	Invertebrates (gastropod: *Eulima ramondi*)	Unknown
LACM VP 7879	Penmar Recreation Center; intersection of Penmar Ave and Rose Ave; Venice	Unknown formation (Pleistocene; sandy silty clay)	Rodent (Rodentia), ground sloth (*Paramylodon*), horse (*Equus*), other uncatalogued vertebrates	11 - 130 feet bgs
LACM IP 4982	Intersection of Sepulveda Blvd. and Venice Blvd	Palos Verdes Sand	Gastropods (*Turbonilla halia*)	Unknown
LACM VP 5833	10580 Wilshire Blvd.; south side of street between Thayer & Westholme Avenues in excavation for building called 'The Wilshire'	Lakewood Formation (poor to well graded; greyish-brown sand & sandy silt with occasional gravels & grey-black cobbles)	Freshwater snails; rodents (Rodentia); horse (*Equus)*	Unknown
LACM VP 4942	SE corner of Airport Blvd. & Manchester Ave	Unknown formation (Pleistocene, massive sandy mudstone w scattered pieces of	Mammoth (*Mammuthus*); bison (*Bison*); hare (*Lepus*)	16 feet bgs

		gravel)		
LACM VP 3264	Los Angeles International Airport	Unknown formation (Pleistocene sands)	Elephant clade (Proboscidea)	25 feet bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the NHMLA. It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice

APPENDIX C. NATIVE AMERICAN CONSULTATION

Sacred Lands File & Native American Contacts List Request

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

Information Below is Required for a Sacred Lands File Search

Project: McKinley Elementary School Campus Master Plan Project

County: Los Angeles

USGS Quadrangle Name: Beverly Hills 7.5'

Township: 1S **Range:** 15W **Section(s):** 32

Township: 2S **Range:** 15W **Section(s):** 5

Company/Firm/Agency: Cogstone Resource Management

Street Address: 1518 W. Taft Ave.

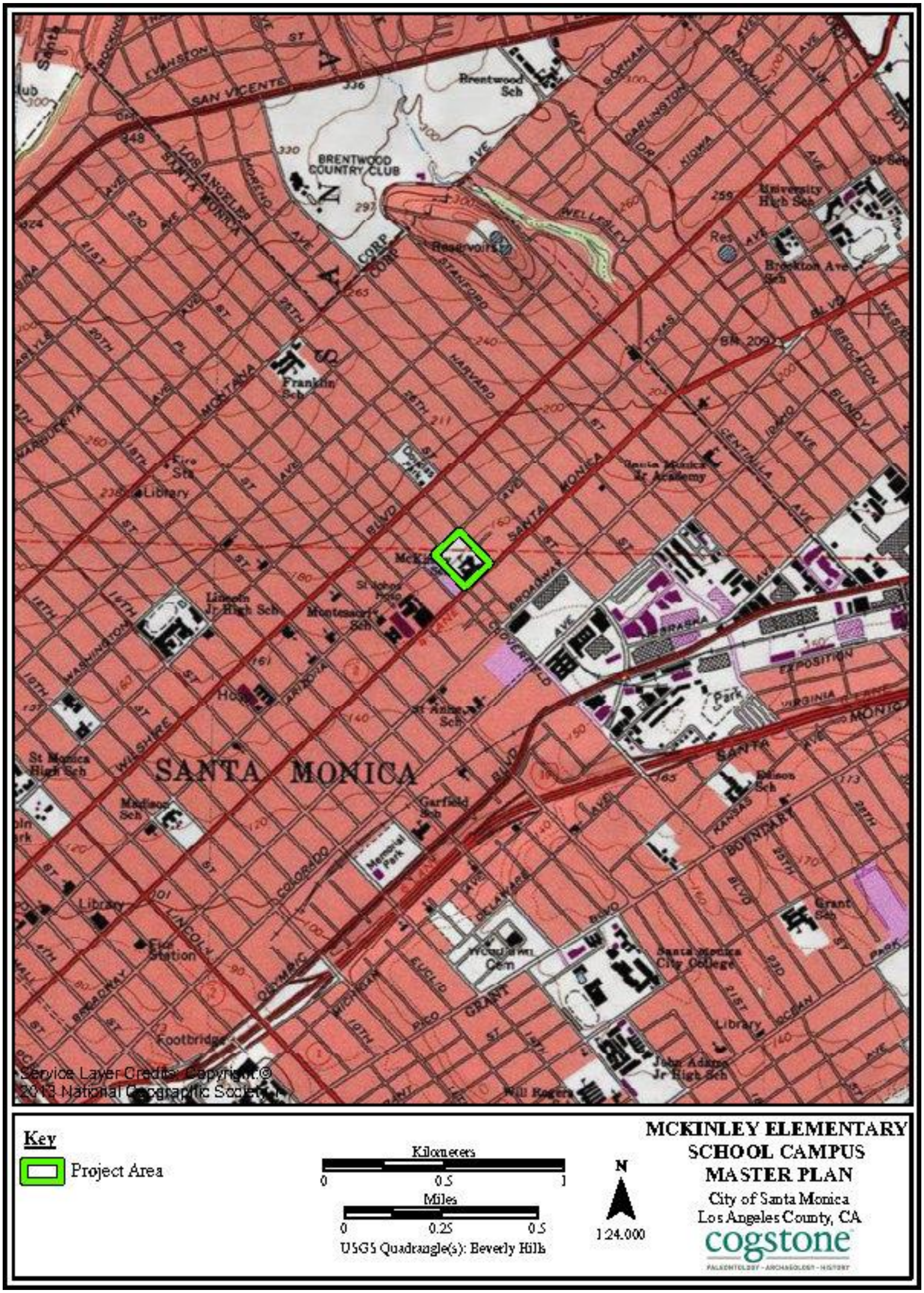
City: Orange **Zip:** 92865

Phone: 714-974-8300

Fax: 714-974-8303

Email: cogstoneconsult@cogstone.com

Project Description:
The Project consists of four phases. Phase I involves the removal of nine portable buildings to construct a new two-story classroom and administration building in the area that currently serves as staff and visitor parking. Additional renovations will be completed within the main building including ground and second floor connections to the main building and new staff and visitor parking and a new on campus drop off/pick-up land would be developed on campus adjacent to Chelsea Avenue. Phases II-IV will be completed at the Santa Monica-Malibu Unified School District's discretion when funding becomes available.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USGS Quadrangle(s): Beverly Hills
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MCKINLEY ELEMENTARY SCHOOL CAMPUS MASTER PLAN
City of Santa Monica
Los Angeles County, CA
cogstone
PALEONTOLOGY - ARCHAEOLOGY - HISTORY

STATE OF CALIFORNIA — Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

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

March 24, 2022

Cogstone Resource Management

Via Email to: cogstoneconsult@cogstone.com

Re: McKinley Elementary School Campus Master Plan Project, Los Angeles County

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological 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. Please contact all of those listed; if they cannot supply information, they may 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 the NAHC. With your assistance, we can assure that our lists contain current information.

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

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Page 1 of 1

APPENDIX D. PALEONTOLOGICAL SENSITIVITY RANKING CRITERIA

Table 9. Paleontological Sensitivity Ranking Criteria

PFYC Description Summary (BLM 2016)	PFYC Rank
Very Low. The occurrence of significant fossils is non-existent or extremely rare. Includes igneous (excluding air-fall and reworked volcanic ash units), metamorphic, or Precambrian rocks. Assessment or mitigation of paleontological resources is usually unnecessary except in very rare or isolated circumstances that result in the unanticipated presence of fossils.	1
Low. Sedimentary geologic units that are unlikely to contain vertebrate or scientifically significant nonvertebrate fossils. Includes rock units less than 10,000 years old and sediments with significant physical and chemical changes (e.g., diagenetic alteration) which decrease the potential for fossil preservation. Assessment or mitigation of paleontological resources is not likely to be necessary.	2
Moderate. Units are known to contain vertebrate or scientifically significant nonvertebrate fossils, but these occurrences are widely scattered and/or of low abundance. Common invertebrate or plant fossils may be found and opportunities may exist for casual collecting. Paleontological mitigation strategies will be based on the nature of the proposed activity. Management considerations cover a broad range of options that may include record searches, pre-disturbance surveys, monitoring, mitigation, or avoidance. Surface-disturbing activities may require assessment by a qualified paleontologist to determine whether significant paleontological resources occur in the area of a proposed action, and whether the action could affect the paleontological resources.	3
High. Geologic units containing a high occurrence of significant fossils. Fossils must be abundant per locality. Vertebrates or scientifically significant invertebrate or plant fossils are known to occur and have been documented but may vary in occurrence and predictability. Mitigation plans must consider the nature of the proposed disturbance, such as removal or penetration of protective surface alluvium or soils, potential for future accelerated erosion, or increased ease of access that could result in looting. Detailed field assessment is normally required and on-site monitoring or spot-checking may be necessary during land disturbing activities. In some cases avoidance of known paleontological resources may be necessary.	4
Very High. Highly fossiliferous geologic units that consistently and predictably produce vertebrate or scientifically significant invertebrate or plant fossils. Vertebrate fossils or scientifically significant invertebrate fossils are known or can reasonably be expected to occur in the impacted area. Paleontological resources are highly susceptible to adverse impacts from surface disturbing activities. Paleontological mitigation may be necessary before or during surface disturbing activities. The area should be assessed prior to land tenure adjustments. Pre-work surveys are usually needed and on-site monitoring may be necessary during land use activities. Avoidance or resource preservation through controlled access, designation of areas of avoidance, or special management designations should be considered.	5
Unknown. An assignment of "Unknown" may indicate the unit or area is poorly studied and field studies are needed to verify the presence or absence of paleontological resources. The unit may exhibit features or preservational conditions that suggest significant fossils could be present, but little information about the actual unit or area is known. Literature searches or consultation with professional colleagues may allow an unknown unit to be provisionally assigned to another Class, but the geological unit should be formally assigned to a Class after adequate survey and research is performed to make an informed determination.	U
Water or Ice. Typically used only for areas which have been covered thus preventing an examination of the underlying geology.	W, I