

Appendix J

Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES REPORT FOR THE EAST END STUDIOS AT 6TH AND ALAMEDA PROJECT

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EXECUTIVE SUMMARY

Gardiner & Theobald Inc. retained Dudek to assist in the identification and documentation of potential impacts to Tribal Cultural Resources (TCRs) that could occur as a result of activities proposed for the East End Studios at 6th and Alameda Project (project). The City of Los Angeles (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). The project proposes the development of a soundstage campus in support of motion picture, television, and commercial production. In total, the project proposes 21 new buildings across an approximately 15-acre site. The project site is located at 1338 East 6th Street in the City of Los Angeles, California. Specifically, the project site is composed portions of three parcels, including Assessor's Parcel Numbers (APNs) 5164-010-003, 5164-010-004, and 5164-010-005 and is bounded by East 6th Street to the north, South Alameda Street to the west, development to the south, and Mill Street to the east. The project falls on public land survey system (PLSS) area Township 1 South, Range 13 West, Section 34, located on the *Los Angeles*, CA 7.5-minute United States Geologic Survey (USGS) Quadrangle.

The present study documents the negative results of a South Central Coastal Information Center (SCCIC), a search of the Native American Heritage Commission (NAHC) Sacred Lands File, and tribal consultation completed by the City pursuant to California Assembly Bill (AB) 52. This report further includes a cultural context and in-depth review of archival, academic, and ethnographic information. No known Native American resources were identified within the project area or a surrounding 0.5-mile search radius through the SCCIC records search completed (August 10 and 14, 2023) or through a search of the NAHC Sacred Lands File (completed September 27, 2017).

A segment of a historic-era water conveyance system known as the Zanja Madre is documented to have run from El Pueblo de Los Angeles, originally a mile or more of the north to the present project site, then travels south along Alameda Street. Given that associated historical map documentation is more than 100 years old, the exact original alignment of the Zanja Madre is uncertain. A separate archaeological and ground penetrating radar (GPR) investigation has been prepared (Comeau 2018). This study did not identify any portion of this feature within the project site.

Pursuant to AB 52, the City Department of City Planning sent project notification letters on March 8, 2017 to all NAHC-listed Native American tribal representatives on their AB 52 Contact List. Chairman Andrew Salas and archaeologist Matt Teutimez, on behalf of the Gabrieleno Band of Mission Indians-Kizh Nation, were the only tribal representatives that responded to project notification conducted by the City Department of City Planning. Consultation occurred between the City and these tribal representatives by phone conference on July 12, 2017. A prehistoric/ethnohistoric village (the named village of *Yangna*) and areas of general cultural sensitivity were noted to have been located approximately one mile or more to the north. The presence of archaeological material consistent with Native American habitation activities in this area has been documented in previous technical studies. In addition, the Los Angeles River (referred to by these representatives as “the

Mother River”) is located approximately 0.6 miles east of the project area and traditional trade routes are known to have also been present in the vicinity, as indicated by historical maps. While these resources have been identified in the surrounding area, no geographically defined TCR was identified through consultation that might be impacted by the project. As such, government to government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a TCR within or near the project area. Given that no TCR has been identified that could be affected, no mitigation for TCRs is necessary. The project site has been substantially disturbed by previous construction and is unlikely to support the presence of significant buried cultural resources or TCRs. Based on current information, impacts to TCRs would be less than significant. The City has established a standard condition of approval to address inadvertent discovery of TCRs should future information arise that results in the identification of a resource that may be impacted by the project.

1 INTRODUCTION

Gardiner & Theobald Inc. retained Dudek to conduct a Tribal Cultural Resources (TCRs) study for the East End Studios at 6th and Alameda Project (project or proposed project) for compliance with the CEQA. The present study documents the results of a SCCIC records search, a search of the NAHC Sacred Lands File, and tribal consultation completed by the lead agency, City of Los Angeles (City), pursuant to California Assembly Bill (AB) 52. This report further includes a cultural context and in-depth review of archival, academic, and ethnographic information. This study closes with a summary of recommended mitigation.

1.1 Project Personnel

Adriane Dorrlor, BA, completed the SCCIC records search and contributed to this report. Elizabeth Denniston, MA, RPA, assisted with project coordination. Adam Giacinto, MA, RPA, acted as principal archaeological and ethnographic investigator, acted as primary author and provided management recommendations for TCRs. Portions of this cultural context have been prepared by Samantha Murray, MA, RPA. Linda Kry, BA, RA, provided management support and assisted in drafting this report. Micah Hale, PhD, RPA reviewed recommendations for regulatory compliance and assisted with report preparation.

1.2 Project Location

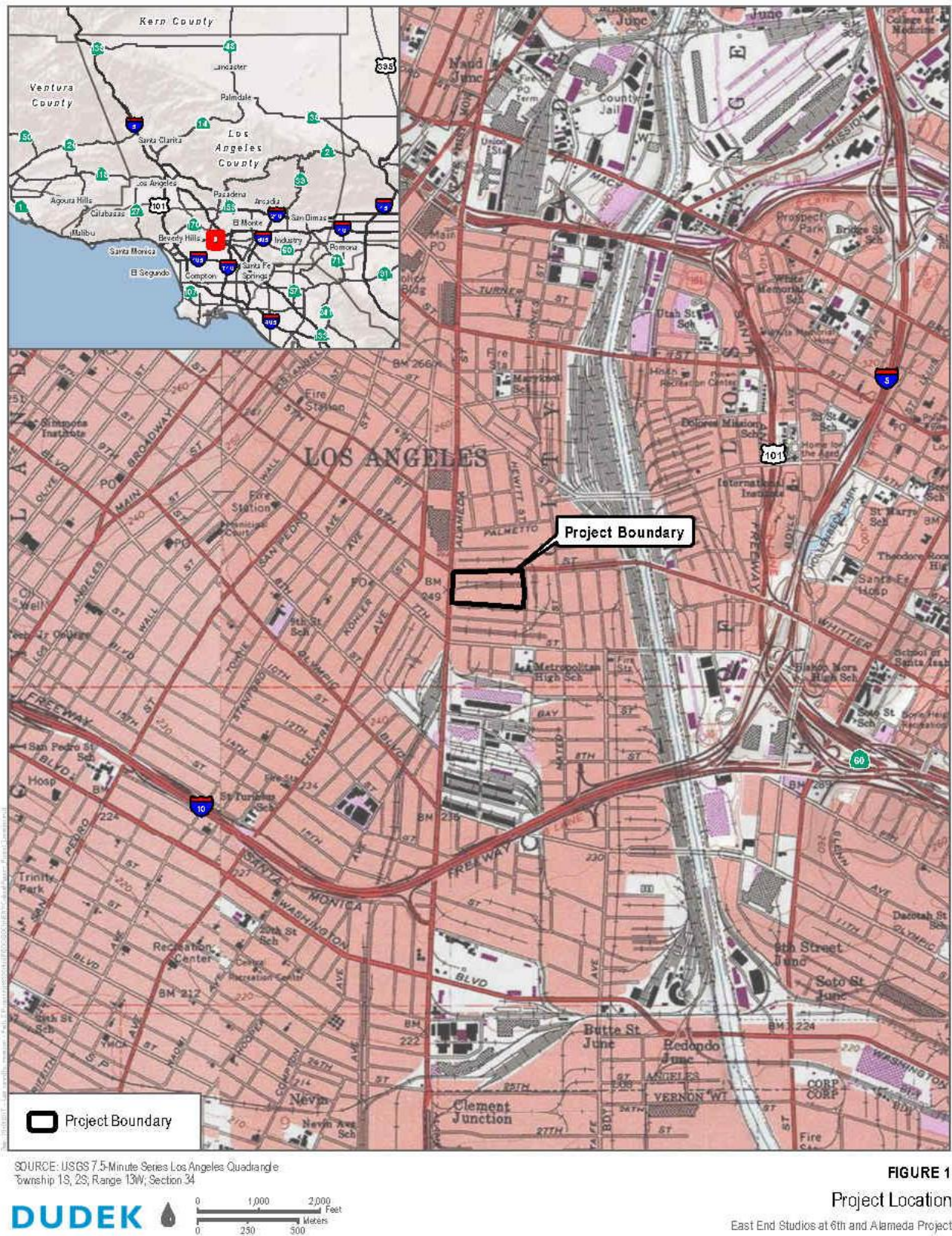
The project site is located site at 1338 East 6th Street in the City of Los Angeles, California within the Arts District Area of the City of Los Angeles, approximately 14 miles east of the Pacific Ocean. The project falls on PLSS area Township 1 South, Range 13 West, within an unsectioned portion of the *Los Angeles*, CA 7.5-minute USGS Quadrangle (Figure 1). Specifically, the approximately 15-acre project site is composed portions of three parcels, including Assessor's Parcel Numbers (APNs) 5164-010-003, 5164-010-004, and 5164-010-005 and is bounded by East 6th Street to the north, Mill Street to the east, South Alameda Street to the west, and development to the south (Figure 2).

1.3 Project Description

The project proposes the development of a soundstage campus and will consist of soundstages and associated ancillary use, incidental office, workshop, and creative workplace space in support of motion picture, television, and commercial production. Specifically, the project proposes eight (8) single-story sound stage studio pair structures each with adjacent 3-story support offices, four (4) 5-story office structures— two (2) of which will also include space for the construction and assembly of sets and filming environments, a 6-story parking structure, and below grade parking dispersed across the parcel. In total, the project includes approximately 720,400 square feet of floor area with an associated floor area ratio (FAR) of 1.13 to 1 based on the lot area of 636,200 square feet. The project would also provide 1,327 parking spaces and 488 bicycle

stalls to accommodate the proposed uses. To provide for the new uses, the existing produce warehouse and distribution facility would be removed.

Construction of the project would commence with demolition of the existing buildings and surface parking areas, followed by grading and excavation. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscaping. It is estimated that earthwork activities would include approximately 120,000 cubic yards cut, with 15,000 cubic yards redeposited as fill, for a net of export of 105,000 cubic yards of soil that would be hauled from the project site during the demolition and excavation phase.



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TRIBAL CULTURAL RESOURCES REPORT FOR THE EAST END STUDIOS AT 6TH AND ALAMEDA PROJECT

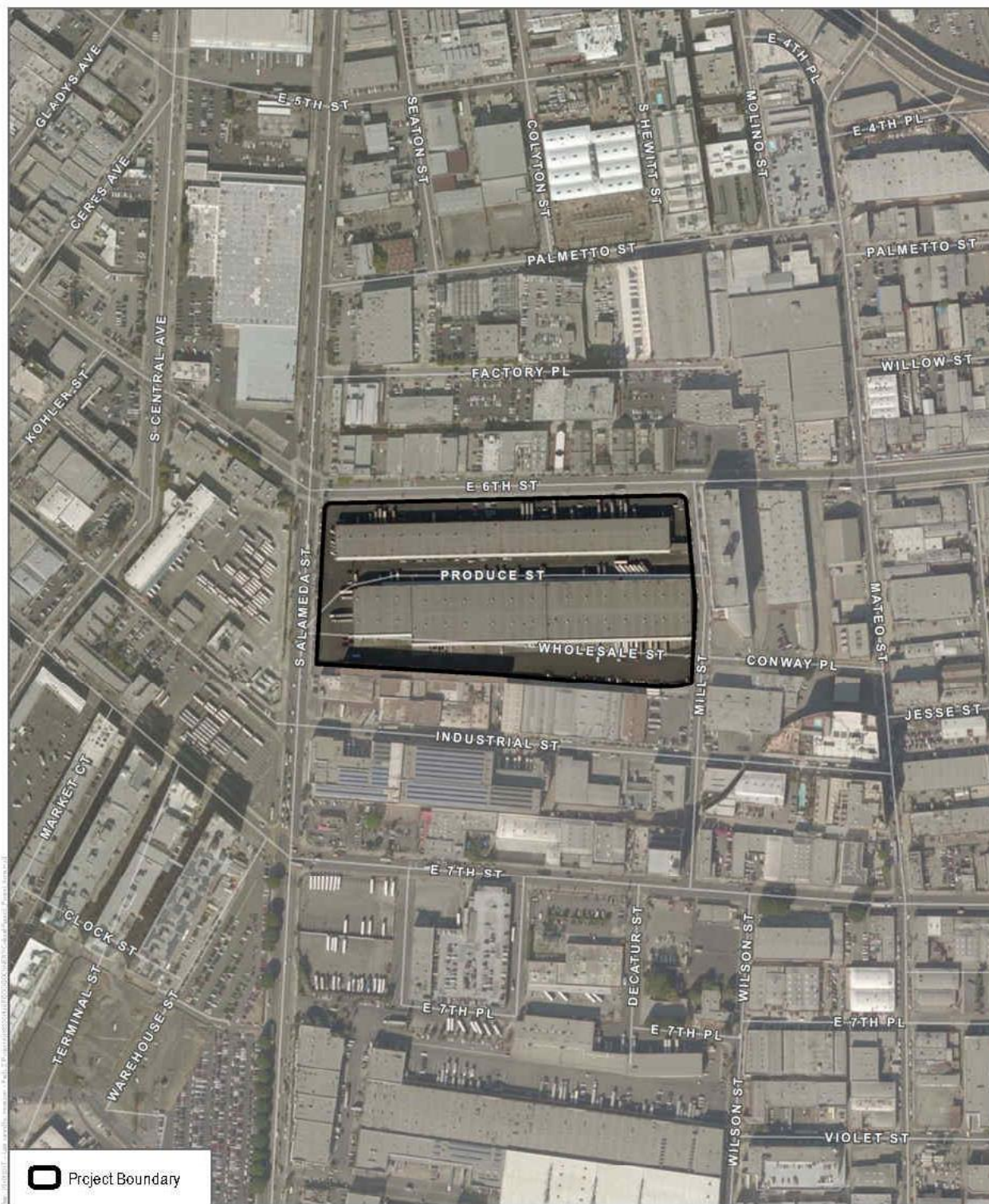


FIGURE 2

Project Area

East End Studios at 6th and Alameda Project

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2 REGULATORY SETTING

This section includes a discussion of the applicable state laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during construction of the proposed project.

2.1 State

2.1.1 The California Register of Historical Resources

In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

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

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

2.1.2 California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (14 CCR 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on nonunique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); 14 CCR 15064.5(c)(4)). However, if a nonunique archaeological resource qualifies as a tribal cultural resource (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that Tribal Cultural Resources (TCR) must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A TCR is either:

- On the California Register of Historical Resources or a local historic register; Eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

2.1.3 California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)).

PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

2.2 Local Regulations

2.2.1 Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monument (HCMs) and are under the aegis of the Planning Department, Office of Historic Resources. They are defined in the Cultural Heritage Ordinance as follows (Los Angeles Municipal Code Section 22.171.7, added by Ordinance No. 178,402, effective April 2, 2007):

Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A Historic-Cultural Monument is further defined by four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria:

1. Is identified with important events in the main currents of national, State or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or
2. Is associated with the lives of Historic Personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values; or
4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

2.2.2 Historic Preservation Overlay Zones

As described by the City of Los Angeles Office of Historic Resources, the Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted in 1979 and amended in 2004 to identify and protect neighborhoods with distinct architectural and cultural resources. HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts.

Regarding HPOZ eligibility, City of Los Angeles Ordinance Number 175891 states (Los Angeles Municipal Code, Section 12.20.3):

Features designated as contributing shall meet one or more of the following criteria:

- (1) adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or
- (2) owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
- (3) retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an Historic place or area of Historic interest in the City.

2.2.3 Permits for Historical and Cultural Buildings

Regarding effects on federal and locally significant properties, Los Angeles Municipal Code states the following (Section 91.106.4.5, Permits for Historical and Cultural Buildings):

The department of Building and Safety shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.

3 ENVIRONMENTAL SETTING

3.1 Environmental Setting and Current Conditions

The project site is currently developed with a produce warehouse and distribution facility that is comprised of two single-story buildings totaling approximately 316, 632 square feet. The project site is relatively flat with limited ornamental landscaping. The project vicinity is developed with a mix of light industrial, commercial and residential uses. To the north, across East 6th Street are a variety of light industrial and commercial uses that include restaurants and live-work spaces. To the south of the project site are light industrial uses that include cold storage, brewery and warehouse and distribution facility uses. East of the project site across Mill Street is a 6-story building currently used by a mix of uses, including ETO Doors, as well as other distribution, warehouse, and creative loft uses. To the west across South Alameda Street is a Metro facility that includes maintenance and storage of buses.

The project site is situated in the valley representing Downtown Los Angeles, 7 miles east of the La Brea Tar Pits, and 17 miles east of the Pacific Ocean. Historical maps indicate the presence of at least one major drainage within the vicinity of the project area, the Los Angeles River, however this river has since been channelized approximately 0.6 miles to the east. The soil underlying existing development is classified as Urban Land, or Commercial Complex, which is associated with discontinuous human-transported material (e.g., soils created as a result of construction or intentionally added fill) over young alluvium derived from sedimentary rock (USDA-NCSS SSURGO 2017). Due the substantial nature of past grading, ground preparation, and other earthwork required to construct, the two large structures occupying nearly the entire project parcel, including work needed for surrounding subsurface utilities and parking areas, all native subsurface soils with potential to support the presence of cultural deposits have likely been disturbed. It should be noted that subsurface Native American resources have been identified in disturbed contexts elsewhere within the region when in the vicinity of documented archaeological resources, as have been encountered in areas within and surrounding Union Station approximately 1 mile to the north.

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4 CULTURAL SETTING

4.1 Prehistoric Overview

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

4.1.1 Paleoindian Period (pre-5500 BC)

Evidence for Paleoindian occupation in the region is tenuous. Our knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego, through the Mojave Desert, and beyond. One of the earliest dated archaeological assemblages in the region is located in coastal Southern California (though contemporaneous sites are present in the Channel Islands) derives from SDI-4669/W-12 in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2006). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on Naval Air Weapons Station China Lake near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multi-component fluted point site, and MNO-680—a single component Great Basined Stemmed point site (see Basgall et al. 2002). At MNO-679 and -680, ground stone tools were rare while finely made projectile points were common.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004). Termed San Dieguito (see also Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (see also Warren 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos's interpretation of San Dieguito has

been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

San Dieguito sites are rare in the inland valleys, with one possible candidate, RIV-2798/H, located on the shore of Lake Elsinore. Excavations at Locus B at RIV-2798/H produced a toolkit consisting predominately of flaked stone tools, including crescents, points, and bifaces, and lesser amounts of groundstone tools, among other items (Grenda 1997). A calibrated and reservoir-corrected radiocarbon date from a shell produced a date of 6630 BC. Grenda (1997) suggested this site represents seasonal exploitation of lacustrine resources and small game and resembles coastal San Dieguito assemblages and spatial patterning.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in Southern California deserts, where hunting-related tools were replaced by processing tools during the early Holocene (see Basgall and Hall 1990).

4.1.2 Archaic Period (8000 BC – AD 500)

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in Southern California. If San Dieguito is the only recognized Paleoindian component in the coastal Southern California, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (see Hale 2001, 2009).

The Archaic pattern, which has also been termed the Millingstone Horizon (among others), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism

(see Basgall and Hall 1990; Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow was adopted around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remained low. After the bow was adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decreased in proportion relative to expedient, unshaped ground stone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complemented only by the addition of the bow and ceramics.

4.1.3 Late Prehistoric Period (AD 500–1769)

The period of time following the Archaic and before Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004); however, several other subdivisions continue to be used to describe various shifts in assemblage composition. In general, this period is defined by the addition of arrow points and ceramics, as well as the widespread use of bedrock mortars. The fundamental Late Prehistoric assemblage is very similar to the Archaic pattern, but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall 1990); even then, weighing the economic significance of millingstone-handstone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages.

4.2 Ethnographic Overview

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Geiger and Meighan 1976; Harrington 1934; Laylander 2000; Sparkman 1908; White 1963). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing

effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California. This is also a particularly important consideration for studies focused on TCRs; where concepts of “cultural resource” and the importance of traditional cultural places are intended to be interpreted based on the values expressed by present-day Native American representatives and may vary from archaeological values (Giacinto 2012).

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact in the sixteenth century (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007).

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007, p. 80). A large amount of variation within the language of a group represents a greater time depth than a group’s language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the “absolute chronology of the internal diversification within a language family” can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztec family (Golla 2007, p. 74). These groups include the Gabrieleño, Cahuilla, and Serrano. Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztec ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010).

4.2.1 Gabrielino/Tongva

The archaeological record indicates that the Gabrieleño arrived in the Los Angeles Basin around 500 B.C. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast.

The name “Gabrielino” or “Gabrieleño” denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrieleño area proper as well as other social groups (Bean and Smith 1978; Kroeber 1925). Therefore, in the post-Contact period, the name does not necessarily identify a specific ethnic or tribal group. The names by which Native Americans in southern California identified themselves have, for the most part, been lost. Many modern Gabrieleño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the Tongva (King 1994), within which there are a number of regional bands. The term Tongva is used in the remainder of this section to refer to the pre-Contact inhabitants of the Los Angeles Basin and their descendants.

Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000 (Bean and Smith 1978), but recent ethnohistoric work suggests a number approaching 10,000 (O’Neil 2002). Houses constructed by the Tongva were large, circular, domed structures made of willow poles thatched with tule that could hold up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996). Archaeological sites composed of villages with various sized structures have been identified.

The nearest large ethnographic Tongva village was that of *Yanga* (also known as Yaangna, Janga, Yangna, and Yabit), which was in the vicinity of the Pueblo of Los Angeles (McCawley 1996:56-57; NEA and King 2004). This village was reportedly first encountered by the Portola expedition in 1769. In 1771, Mission San Gabriel was established. Yanga provided a large number of individuals to this mission; however, the following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid became increasingly common, which had the result of reducing the number of Native American neophytes from the immediately surrounding area (NEA and King 2004). Mission records indicate that 179 Gabrieleño inhabitants of Yanga were members of the San Gabriel Mission (King 2000:65; NEA and King 2004: 104). Based on this information, Yanga may have been the most populated village in the Western Gabrieleño territory.

Father Juan Crespi passed through the area near this village on August 2-3, 1769. The pertinent sections from his translated diary are provided here:

Sage for refreshment is very plentiful at all three rivers and very good here at the Porciúncula [the Los Angeles River]. At once on our reaching here, eight heathens came over from a good sized village encamped at this pleasing spot among some trees. They came bringing two or three large bowls or baskets half-full of very good sage with other sorts of grass seeds that they consume; all brought their bows and arrows but with the strings removed from the bows. In his hands the chief bore strings of shell beads of the sort that they use, and on reaching the camp they threw the handfuls of these beads at each of us. Some of the heathens came up smoking on pipes made of baked clay, and they blew three mouthfuls of smoke into the air toward each one of us. The Captain and myself gave them tobacco, and he gave them our own kind of beads, and accepted the sage from them and gave us a share of it for refreshment; and very delicious sage it is for that purpose.

We set out at a half past six in the morning from this pleasing, lush river and valley of Our Lady of Angeles of La Porciúncula. We crossed the river here where it is carrying a good deal of water almost at ground level, and on crossing it, came into a great vineyard of grapevines and countless rose bushes having a great many open blossoms, all of it very dark friable soil. Keeping upon a westerly course over very grass-grown, entirely level soils with grand grasses, on going about half a league we came upon the village belonging to this place, where they came out to meet and see us, and men, women, and children in good numbers, on approaching they commenced howling at us though they had been wolves, just as before back at the spot called San Francisco Solano. We greeted them and they wished to give us seeds. As we had nothing at hand to carry them in, we refused [Brown 2002:339-341, 343].

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978:546; Kroeber 1925; McCawley 1996).

A wide variety of tools and implements were used by the Tongva to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996).

Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food

was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

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

Deceased Tongva were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996). Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966), as well as scattered among broken ground stone implements (Cleland et al. 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a wide variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (Johnston 1962; McCawley 1996; Reid 1926). At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period (McCawley 1996).

4.3 Historic-Period Overview

The written history for the State of California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American Period when California became a territory of the United States.

4.3.1 Spanish Period (1769–1821)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan Rodríguez Cabrillo stopped in 1542 at present-day San Diego Bay. With his crew, Cabrillo explored the shorelines of present Catalina Island as well as San Pedro and Santa Monica Bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno's crew also landed on Santa Catalina Island and

at San Pedro and Santa Monica Bays, giving each location its long-standing name. The Spanish crown laid claim to California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

More than 200 years passed before Spain began the colonization and inland exploration of Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July of 1769, while Portolá was exploring southern California, Franciscan Fr. Junípero Serra founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father Crespi named "the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula" or "Our Lady the Queen of the Angeles of the Porciúncula." Two years later, Friar Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Kyle 2002). Mission San Fernando Rey de España was established nearly 30 years later on September 8, 1797.

4.3.2 Mexican Period (1821–1848)

A major emphasis during the Spanish Period in California was the construction of missions and associated presidios to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns, but just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles). Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. Nine ranchos were granted between 1837 and 1846 in the future Orange County (Middlebrook 2005). Among the first ranchos deeded within the future Orange County were Manuel Nieto's Rancho Las Bolsas (partially in future Los Angeles County), granted by Spanish Governor Pedro Fages in 1784, and the Rancho Santiago de Santa Ana, granted by Governor José Joaquín Arrillaga to José Antonio Yorba and Juan Pablo Peralta in 1810 (Hallan-Gibson 1986). The secularization of the missions (enacted 1833) following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

4.3.3 American Period (1848–Present)

War in 1846 between Mexico and the United States precipitated the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. The Mexican-American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. Territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 2005).

4.4 Project Site Historic Context

4.4.1 City of Los Angeles

In 1781, a group of 11 Mexican families traveled from Mission San Gabriel Arcángel to establish a new pueblo called El Pueblo de la Reyna de Los Angeles (the Pueblo of the Queen of the Angels). This settlement consisted of a small group of adobe-brick houses and streets and would eventually be known as the Ciudad de Los Angeles (City of Angels), which incorporated on April 4, 1850, only two years after the Mexican-American War and five months prior to California achieving statehood. Settlement of the Los Angeles region continued in the early American Period. The County of Los Angeles was established on February 18, 1850, one of 27 counties established in the months prior to California acquiring official statehood in the United States. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944). Nonetheless, ranching retained its importance, and by the late 1860s, Los

Angeles was one of the top dairy production centers in the country (Rolle 2003). By 1876, Los Angeles County reportedly had a population of 30,000 persons (Dumke 1944).

Los Angeles maintained its role as a regional business center and the development of citriculture in the late 1800s and early 1900s further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the impact of the real estate boom of the 1880s on Los Angeles (Caughey and Caughey 1977; Dumke 1944).

By the late 1800s, government leaders recognized the need for water to sustain the growing population in the Los Angeles area. Irish immigrant William Mulholland personified the city's efforts for a stable water supply (Dumke 1944; Nadeau 1997). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley and Mulholland planned and completed the construction of the 240-mile aqueduct that brought the valley's water to the city (Nadeau 1997).

Los Angeles continued to grow in the twentieth century, in part due to the discovery of oil in the area and its strategic location as a wartime port. The county's mild climate and successful economy continued to draw new residents in the late 1900s, with much of the county transformed from ranches and farms into residential subdivisions surrounding commercial and industrial centers. Hollywood's development into the entertainment capital of the world and southern California's booming aerospace industry were key factors in the county's growth in the twentieth century.

5 BACKGROUND RESEARCH

5.1 SCCIC Records Search

As part of the cultural resources study prepared for the proposed project, Dudek conducted a CHRIS records search at the SCCIC on August 10 and 14, 2023, for the proposed project site and surrounding 0.5-mile. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the project area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The results of the records search are presented in Confidential Appendix A. One previous cultural resources technical study has included the proposed project site. No prehistoric archaeological sites, or other resources documented to be related to past Native American activity, have been previously identified within the project site or surrounding 0.5-mile records search buffer.

5.1.1 Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 45 previous cultural resource studies have been conducted within 0.5-mile (800 meters) of the project site between 1986 and 2017. Of these, one study is mapped as overlapping the project site (LA-13239), three studies run adjacent to the eastern and northern boundaries of the project site (LA-02950, LA-03813, and LA-04834). Table 1 below summarizes all 45 previous cultural studies within the records search area, followed by brief summaries of the overlapping/adjacent studies.

Table 1. Previous Technical Studies Within a 0.5-Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-02577	Wlodarski, Robert J.	1992	Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California	Outside
LA-02644	Wlodarski, Robert J.	1992	The Results of a Phase I Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California	Outside
LA-02877	Valentine-Maki, Mary Svete and Steve Svete	1992	Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project	Outside
LA-02950	Peak & Associates, Inc.	1992	Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project	Adjacent

Table 1. Previous Technical Studies Within a 0.5-Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-02966	Geotransit Consultants	1993	Draft Stage I Environmental Site Assessment Eastside Extension (from Whittier Boulevard and Atlantic Boulevard Intersection to Union Station Area) Metro Red Line, Los Angeles, California	Outside
LA-03103	Greenwood, Roberta S.	1993	Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1	Outside
LA-03115	Wlodarski, Robert J.	1995	Addendum Report: Results of a Phase I Archaeological Study of the Proposed Construction of the Whittier Boulevard Shaft Site East Central Interceptor Sewer Project, East-West Alignment, Los Angeles County	Outside
LA-03813	Peak & Associates, Inc.	1992	An Archival Study of a Segment of the Proposed Pacific Pipeline, City of Los Angeles, California	Adjacent
LA-03923	Foster, John M. and Roberta S. Greenwood	1998	Archaeological Investigations at Maintenance of Way Facility, South Santa Fe Avenue (CA-LAN-2563H)	Outside
LA-04047	Greenwood, Roberta S. and Portia Lee	1998	Transportation-related Resources on South Santa Fe Avenue, Los Angeles	Outside
LA-04074	Ohara, Cindy L.	1989	Sixth Street Viaduct Over Los Angeles River Earthquake Damages - W.O. E6000000, Determination of Effect Report	Outside
LA-04625	Starzak, Richard	1994	Historic Property Survey Report for the Proposed Alameda Corridor From the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California	Outside
LA-04743	Gray, Deborah	1999	Cultural Resource Assessment for Pacific Bell Mobil Services Facility LA 648-07, In the County of Los Angeles, California	Outside
LA-04834	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties	Adjacent
LA-04835	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	Outside
LA-07425	McMorris, Christopher	2004	City of Los Angeles Monumental Bridges 1900-1950: Historic Context and Evaluation Guidelines	Outside
LA-07427	McMorris, Christopher	2004	Caltrans Historic Bridge Inventory Update: Metal Truss, Movable, and Steel Arch Bridges	Outside
LA-07900	Wlodarski, Robert J.	2006	Records Search and Field Reconnaissance Phase for the Proposed Royal Street Communications Wireless Telecommunications Site LA0150A (East LA/American Storage), Located at 300 South Avery Street, Los Angeles, California 90013	Outside

Table 1. Previous Technical Studies Within a 0.5-Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-08252	Snyder, John W. and Stephen Mikesell	1986	Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch	Outside
LA-08298	Bonner, Wayne	2007	Cultural Resources Record Search and Site Visit Results for Royal Street Communications, LLC Candidate LA2915A (Skid Row Trust), 676 South Central Avenue, Los Angeles, Los Angeles County, California	Outside
LA-08518	Taniguchi, Christeen	2004	Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Warehouse Building in the City of Los Angeles (Los Angeles County), California	Outside
LA-08635	Ramirez, Robert S. and Robin D. Turner	2008	A Phase I Cultural Resource Assessment and Paleontologic Assessment for the Proposed Los Angeles Department of Water and Power Distribution Center #144 in the City of Los Angeles, Los Angeles County, California	Outside
LA-08733	Bonner, Wayne and Sarah A. Williams	2006	Cultural Resources Records Search Results and Site Visit for Sprint Nextel Telecommunications Facility Candidate CA8283E (Van Wyck) 601 South Santa Fe Avenue, Los Angeles, Los Angeles County, California	Outside
LA-09395	Billat, Lorna	2004	Meyers/CA-6357A 300 Avery Street, Los Angeles, CA	Outside
LA-09844	Greenwood & Associates	2001	Draft: Los Angeles Eastside Corridor, Revised Cultural Resources Technical Report, Final Supplemental Environmental Impact Statement/Final Subsequent Environmental Impact Report	Outside
LA-10451	Chasteen, Carrie	2008	Finding of Effect–6th Street Viaduct Seismic Improvement Project	Outside
LA-10452	Smith, Francesca	2007	Historical Resources Evaluation Report–6th Street Viaduct Seismic Improvement Project	Outside
LA-10506	Greenwood, Roberta S., Scott Savastio, and Peter Messick	2004	Cultural Resources Monitoring: North Outfall Sewer–East Central Interceptor Sewer Project	Outside
LA-10638	Tang, Bai "Tom"	2010	Preliminary Historical/Archaeological Resources Study, Southern California Regional Rail Authority (SCRRA) River Subdivision Positive Train Control Project, City of Los Angeles, Los Angeles County, California	Outside
LA-10701	Bonner, Wayne and Kathleen Crawford	2010	Cultural Resources Records Search, Site Visit Results, and Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS5989A/CA5630 (Central), 810 Kohler Street, Los Angeles, California	Outside

Table 1. Previous Technical Studies Within a 0.5-Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-10887	Starzak, Richard, et al.	2001	Historic Property Survey Report for the North Outfall Sewer-East Central Interceptor Sewer, City of Los Angeles, County of Los Angeles, California	Outside
LA-11048	Speed, Lawrence	2009	American Recovery and Reinvestment Act (ARRA) Funded Security Enhancement Project (PRJ29112359) - Improved Access Controls, Station Hardening, CCTV Surveillance System, and Airborne Particle Detection at Los Angeles Station and Maintenance Yard, LA, CA	Outside
LA-11405	Loftus, Shannon	2011	Cultural Resource Records Search and Site Survey AT&T Site LAC778, 4th Street/101 Freeway, 300 1/2 Avery Street, Los Angeles, Los Angeles County, California 90013 CASPR #3551015013	Outside
LA-11416	Loftus, Shannon	2011	Historic Architectural Resource Finding of Evaluation Summary, AT&T Site LAC778, 4th Street/101 Freeway, 300 1/2 Avery Street, Los Angeles County, California 90013 CASPR#3551015013	Outside
LA-11618	Grimes, Teresa, Jessica MacKenzie and Jessica Fatone	2007	Los Angeles Wholesale Terminal Market Historic Resource Report	Outside
LA-11642	Daly, Pam and Nancy Sikes	2012	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	Outside
LA-11785	Rogers, Leslie	2012	Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension	Outside
LA-12210	Bonner, Wayne and Kathleen Crawford	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02648A (LA648 Rossmore Hotel) 901 East 6th Street, Los Angeles, Los Angeles County, California	Outside
LA-12211	Bonner, Wayne and Kathleen Crawford	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE05267B (0567 Storage Space Bldg.) 300 Avery Street, Los Angeles, Los Angeles County, California	Outside
LA-12349	Perez, Don	2012	Metro Relo Starkman/Ensite #11976, 544 Mateo Street, Los Angeles, Los Angeles County	Outside
LA-12381	Fulton, Phil	2013	Cultural Resources Assessment Class I Inventory, Verizon Wireless Services Metro Relo Facility City of Los Angeles, Los Angeles County, California	Outside
LA-12586	Glenn, Brian and Patrick Maxon	2008	Archaeological Survey Report for the 6th Street Viaduct Improvement Project City of Los Angeles Los Angeles County, California	Outside

Table 1. Previous Technical Studies Within a 0.5-Mile of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-12665	Bray, Madeleine, Michael Vader, and Monica Strauss	2015	Final Archaeological Resources Monitoring Report for the Los Angeles Department of Water and Power La Kretz Innovation Campus Project, Los Angeles County, California	Outside
LA-12848	Bray, Madeleine and Vanessa Ortiz	2016	Final Archaeological Resources Addendum Report for the Los Angeles Department of Water and Power La Kretz Innovation Campus Project Los Angeles County, California	Outside
LA-13239	Gust, Sherri	2017	Extent of Zanja Madre	Overlapping

Pacific Pipeline Project (LA-02950 & LA-03813)

In 1992, Pacific Pipeline System, Inc. (PPSI) proposed the construction of a 172-mile crude oil pipeline between Gaviota in Santa Barbara County to refineries in El Segundo and Long Beach within Los Angeles County. According the report, nearly all of the pipeline would be installed within previously disturbed areas such as the railroad right-of-way, highway and road corridors, and through existing pipelines. A segment of the proposed alignment traversed Alameda Street, running adjacent to the western boundary of the present project site.

PPSI retained Peak & Associates to conduct cultural resources studies of the entire alignment prior to project implementation. Results of the initial overarching study, *Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project* (LA-02950), described widespread historic disturbance to archaeological sites along the corridor caused by the construction of the railroad (Peak & Associates 1992a). Overall, 59 prehistoric sites were identified along the proposed route, all of which were within Santa Barbara and Ventura Counties. None of the identified prehistoric resources were in the vicinity of the current project site or within the surrounding 0.5-mile records search buffer.

Peak & Associates provided a supplemental study focusing on the section of the proposed Pacific Pipeline Project that extended from the Los Angeles River point of crossing within Los Angeles County south along Alameda Street to Olympic Boulevard, capturing the eastern boundary of the current project site. This study (LA-03813) included an archival review of the area to determine whether historic period cultural resources would be impacted by construction of the pipeline. The study identified Alameda Street as a major trunkline transportation route “from the earliest period of the city’s existence,” noting that the San Pedro to Los Angeles railroad was within the trunkline since the 1860s (Peak & Associates 1992b, pg. 33).

Additionally, the study found that a portion of the historic period water delivery system known as the Zanja Madre was mapped along the eastern side of Alameda Street. The Zanja Madre was established in 1781 at the same time that the pueblo of Los Angeles was founded. The original construction consisted of a series of

interconnected open ditches. This ditch system was expanded with time. By the late nineteenth century, many of the ditches were lined with brick and enclosed to better serve the irrigation needs of the rapidly developing City of Los Angeles.

LA-04834

Williams Communications, Inc. retained Jones & Stokes to conduct a cultural resources study in support of the Fiber Optic Cable System Installation Project. The project proposed the installation of a below ground fiber optic cable system that would connect Los Angeles with Anaheim, California through largely urban and suburban areas. A portion of the alignment ran adjacent to the northern perimeter of the current project site through East 6th Street. No prehistoric resources were identified as a result cultural study due in part to the developed nature of the project area. However, two prehistoric village sites were identified along the corridor during consultation with the Gabrielino/Tongva Tribe: the possible vicinity of the ethnohistoric village *Yanga* (mapped approximately one-mile north of the current project site) and the possible vicinity of the ethnohistoric village *Hautnga* (mapped approximately 6-miles south of the project site).

LA-13239

A review of SCCIC records search and archival information, completed by Cogstone Resource Management, Inc (Cogstone) 2017, resulted in a map of the likely alignments associated with the historic-period Zanja Madre water conveyance system network throughout the City of Los Angeles. Cogstone mapped the likely route of a segment of the Zanja Madre (known as Zanja No. 2) as running through the vicinity of the project site. A separate archaeological and ground penetrating radar (GPR) study was completed by Dudek with the intent of identifying if this feature intersects the project site (Comeau et al. 2018). The study did not identify this feature within the project site.

5.1.2 Previously Recorded Cultural Resources

SCCIC records indicate that a total of 51 previously recorded cultural resources fall within the 0.5-mile records search buffer, none of which are within the project site. Of these, 45 are historic-era buildings or structures (built environment resources) with construction dates falling most commonly between the years 1900-1940. Built environment resources fall outside the scope of the present study and will not be addressed in this report. The remaining six (6) resources are historic-era archaeological resources (P-19-002610, P-19-003683, P-19-004192, P-19-004193, P-19-004460, and P-19-004832). No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within a 0.5-mile of the project site. Table 2, below, provides a summary of the archaeological resources within the records search radius.

Table 2. Previously Recorded Archaeological Resources Within a 0.5-Mile of the Project Site

Primary Number (P-19-)	Trinomial (CA-LAN-)	Age and Type	Description	Recording Events	Proximity to Project Site
002610	002610H	Historic Period Site	Late nineteenth to early twentieth century old cobblestone paved road and the remains of a street car rail line.	1997 (Shelley M Owen, Greenwood & Associates); 2011 (Shannon Loftus, ACE Environmental)	Outside
003683	003683H	Historic Period Site	Late nineteenth to early twentieth century domestic refuse scatter.	2003 (Alice Hale)	Outside
004192	004192H	Historic Period Site	Early to mid-twentieth century refuse scatter, including brick and glass fragments (15 total).	2010 (L. Solis, N. Orsi, URS Corporation)	Outside
004193	004193H	Historic Period Site	Remains of an original road dating between the early to mid-twentieth century.	2010 (L. Solis, N. Orsi, URS Corporation)	Outside
004460	004460H	Historic Period Site	Late nineteenth to mid-twentieth century refuse deposits (25 total), the remains of two structural features, and eight (8) isolated historic period glass and ceramic items.	2014 (Michael Vader, ESA); 2016 (V. Ortiz, ESA)	Outside
004832	-	Historic Period Site	Refuse deposit with some items, including architectural debris, glass and ceramic, dating between the early to turn of the twentieth century.	2017 (Nicholas Hearth, Duke CRM)	Outside

As noted above in the summary for report LA-13239, a section of a Spanish and Mexican-era water conveyance system known as the Zanja Madre is thought to have run from El Pueblo de Los Angeles, originally a mile or more to the north to the present project site, south along or near Alameda Street. This

feature is on file with the CA Office of Historic Preservation (reference number 19-0531), and appears to remain unevaluated for NRHP and/or CRHR listing (Status Code 7W: Submitted to OHP for action – withdrawn August 4, 2008). The exact original alignment of the Zanja Madre is uncertain in the vicinity of the present project site, given that records of this feature are over 100 years old. Segments in Downtown Los Angeles have been unearthed between approximately 0.85 mile and 2 miles to the north of the project site, the most recent being at Blossom Plaza on North Broadway (1.5 miles north) in 2014. The term *zanja* translates as “ditches” in English. Native American involvement in local agriculture has been well documented during the Spanish and Mexican period in Los Angeles, and would have contributed to construction of the initial open earthen ditch features. Many early *zanjas* were either destroyed or enclosed with brick in the late nineteenth century, and use later ceased in the early years of the twentieth century. Based on the nature of this feature, originally running along roads just below the ground surface, it is very unlikely that portions of the Zanja Madre, specifically Zanja No. 2, or subsequent offshoots would remain intact within the current proposed project site given the severity of past subsurface disturbances involved in construction of the buildings that now occupy this parcel. As noted above, a separate archaeological and GPR investigation conducted by Dudek did not indicate that this feature is present within the project site (Comeau et. al 2018).

5.2 Native American Correspondence

5.2.1 NAHC Sacred Lands File Search

As part of the process of identifying cultural resources within or near the project, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on September 22, 2017. The NAHC emailed a response on September 27, 2017, which stated that the SLF search was completed with negative results, however the area is sensitive for cultural resources. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the proposed project site. The NAHC provided the contact information of the five (5) persons and entities with whom to contact along with the SLF search results. Documents related to the NAHC SLF search are included in Appendix B.

5.2.2 Record of Assembly Bill 52 Consultation

The proposed project is subject to compliance with AB 52 (PRC 21074) which requires consideration of impacts to “tribal cultural resources” as part of the CEQA process, and requires the lead agency to notify any groups (who have requested notification) of the proposed project who are traditionally or culturally affiliated with the geographic area of the project. Pursuant to AB 52, the City of Los Angeles Department of City Planning sent project notification letters on March 8, 2017 to all NAHC-listed Native American tribal representatives on their AB 52 Contact List. Chairman Andrew Salas and archaeologist Matt Teutimez, on behalf of the Gabrieleno Band of Mission Indians-Kizh Nation, were the only tribal representatives that responded to this project notification. Consultation occurred between the City and these tribal representatives

by phone conference on July 12, 2017. A direct record of consultation is provided in the EIR from the project. To following section summarizes comments provided thematically.

Mr. Salas and Mr. Teutimez identified the named village of *Yangna* to be in the surrounding region, which was identified as located south of what is now Dodger's Stadium. Native American settlements, or other areas of human use, were observed to be more expansive and continuous here compared to other areas. In addition, the Los Angeles River (referred to by these representatives as "the Mother River") is located approximately 0.6 miles east of the project area and traditional trade routes were noted to have also been present in the vicinity, as indicted by historical maps. Mr. Salas and Mr. Teutimez indicated that these routes, in some instances, represented trade connections that would extend eastward to other states and southward to the current day ports of Los Angeles and Long Beach. The potential for buried TCRs was suggested to be more likely in areas subject to flooding by the Los Angeles River. Mr. Teutimez further noted on this subject that known buried Native American burials and other cultural material were observed to have been encountered in the vicinity of Union Station, and referenced an unspecified location where fire hearths were recently uncovered at varying depths down to 40 feet.

Comments were provided by Mr. Teutimez relating to the project site sensitivity for unanticipated buried cultural deposits. This was specifically in reference to discussions with the City that indicated that, given the developed nature of the parcel, the project site was likely be underlain by imported fill to depths of at least 6 feet below the current ground surface. Mr. Teutimez requested that tribal monitoring occur during the excavation phase of construction, this being particularly important in native, undisturbed soil below any imported fill that may be present. He indicated that this might be reduced from full-time monitoring to periodic "spot-checking" in soils for which records document it as imported fill.

It should be noted that Mr. Salas and James Flaherty (a representative on behalf of Mr. Salas), have provided additional information to the City relating to known Native American resources as part of previous consultation efforts for another nearby project (on Figueroa and 8th streets). On October 3, 2016, Mr. Flaherty noted that human burials were encountered as part of construction of a government building in the referenced location of Yangna, and that these burials were later repatriated by Chief Ernest Salas on site. The building remains unspecified here due to confidentiality issues. The Gabrieleno Band of Mission Indians-Kizh Nation representatives commonly reference the 1938 Kirkman-Harriman Historical Map (Figure 3) as part of consultation efforts on other projects, with the intent of providing documentation of trade routes and Native American villages that were observed between 1860 and 1937. This maps has been reviewed below.

Consultation efforts to date do provide evidence of the village of Yanga and other areas of observed cultural sensitivity one mile or more to the northeast. No known geographically-defined resources were identified within, or in the immediate vicinity of, the project area through consultation. As such, no TCRs or known cultural resources have been identified that could be impacted by the project. No additional responses or record of Native American tribal consultation have been provided by the City to date.

5.3 Ethnographic Research and Review of Academic Literature

Dudek cultural resources specialists reviewed academic and ethnographic literature for information pertaining to past Native American use of the project area. This review included consideration of sources identified by the Gabrieleno Band of Mission Indians-Kizh Nation during present and past consultations with the City. Figure 3 shows the general project location (in blue) relative to features identified on the 1938 Kirkman-Harriman historical map referenced above. Based on this map, the project area is in the vicinity of a route labeled as “very ancient trail.” Heading north, the trail intersects a number of other routes at the historic location of El Pueblo de Los Angeles, mapped 2.5 miles to the north. While the specific routes would have varied throughout human prehistory based on changing topographic and environmental conditions, regional evidence from known archaeological sites clearly documents wide-spread patterns of exchange in goods and resources between neighboring tribes (see above cultural context). This map is highly generalized due to scale and age, and may be somewhat inaccurate with regard to distance and location of mapped features. Additionally, this 1938 map was prepared more than 100 years following secularization of the missions (in 1833) and includes no primary references. While the map is a valuable representation of post-mission history, substantiation of the specific location and uses of the represented individual features would require archaeological or other primary documentation on a case-by-case basis.

At the time of Portola’s and Crespi’s travels, and through the subsequent mission period, the area surrounding the project site would have been occupied by Western Gabrieleño/Tongva inhabitants (Figure 4 and Figure 5). Use of Gabrieleño as a language has not been documented since the 1930s (Golla 2011). One study made an effort to map the traditional Gabrieleño/Tongva cultural use area through documented family kinships and Native American census data documented in mission records (NEA and King 2004). Working under the assumption that missionization affected the region’s population relatively evenly, this process allowed the researchers to identify the relative size of tribal villages (settlements) based on the number of individuals reported in these records (Figure 6). Traditional cultural use area boundaries, as informed by other ethnographic and archaeological evidence, were then drawn around these clusters of villages. The nearest village site to the project was Yabit (also recorded as Yanga or Yangna), and has been discussed in the above cultural context (McCawley 1996; NEA and King 2004). Mission records indicate that 179 Gabrieleño inhabitants of Yanga were documented at San Gabriel Mission, indicating that it may have been the most populated village in the Western Gabrieleño territory (NEA and King 2004: 104). In general, the mapped position of this village has been substantiated through archaeological evidence, although the archaeological record has been substantially compromised by rapid and early urbanization throughout much of the region.

Archaeological evidence has suggested that the village of Yanga may have been located anywhere between the current Dodger’s Stadium and the Bella Union Hotel (constructed circa 1870), and centering around Union Station (constructed circa 1939). Technical studies completed for the Los Angeles Rapid Transit project (Westec 1983) are perhaps the most informative with regard to the distribution of archaeological finds in this area. Cultural material indicative of habitation activities characteristic of a village such as Yanga have been

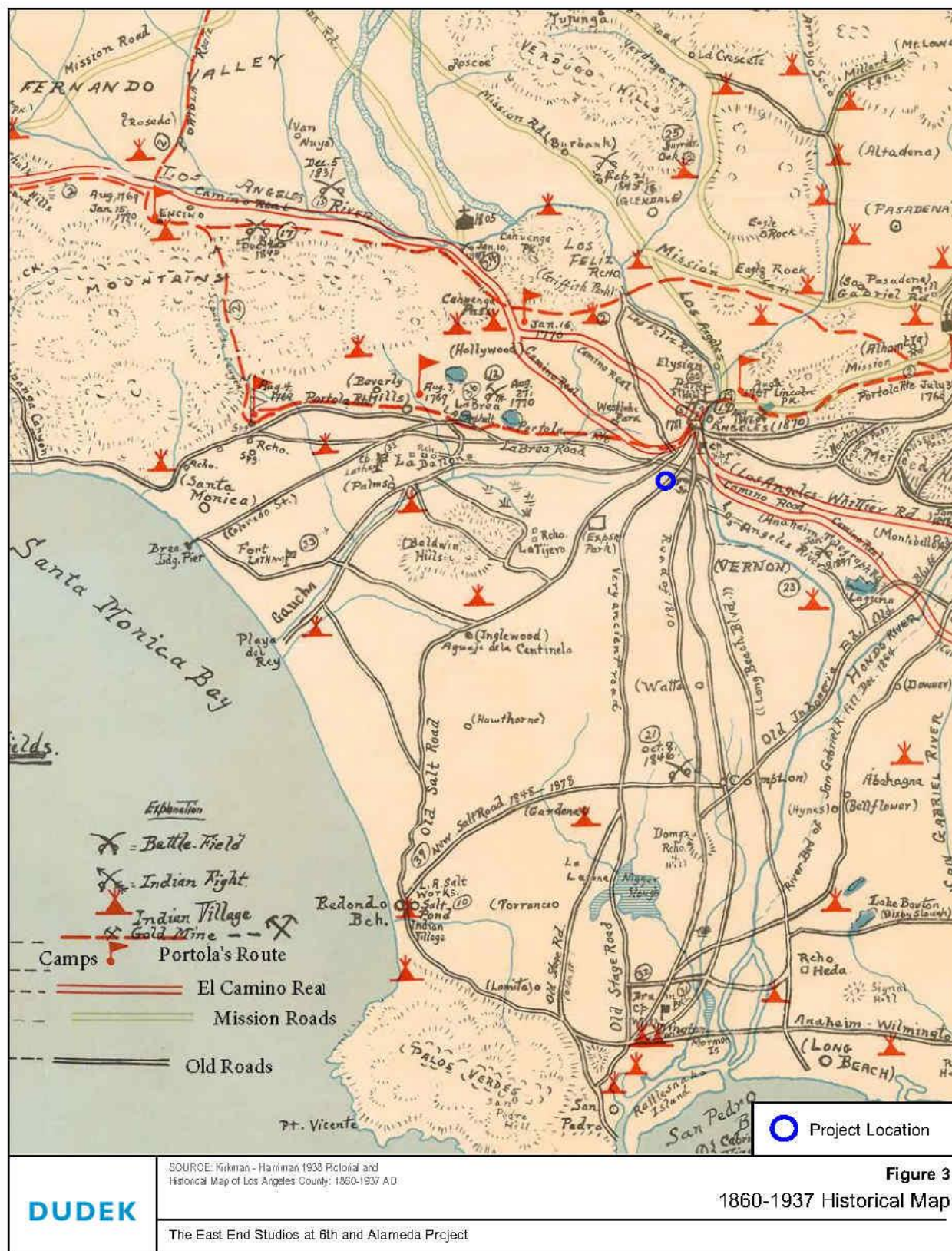
encountered throughout this area, however, has been more extensively documented within approximately 1000 feet surrounding Union Station (NEA and King 2004). While, this may be partially the result of a greater relative amount of archaeological attention, evidence suggests that there has been both intensive prehistoric and historic-era (notably Spanish/Mexican period) use of this area. The broader area now occupied by downtown Los Angeles would have been used by Native American inhabitants, and the location of the village of Yanga shifted to multiple locations based on its suitability relative to the route of the meandering Los Angeles River over thousands of years. Spanish/Mexican inhabitants who settled here were undoubtedly situated in areas prehistorically occupied by the Gabrieleño, however were more spatially constrained (at least in the initial years) to the area around what is now El Pueblo de Los Angeles State Park and Union Station. Regardless of the most intensively used portion of the Native American village of Yanga, ethnographic, historical, and archaeological evidence suggests that the boundaries of this habitation area were a mile or more from the proposed project site during prehistoric periods and as close as 0.85 mile north during the historic-era. In general, the mapped position of Yanga has been substantiated through archaeological evidence, although the archaeological record has been substantially compromised by rapid and early urbanization throughout much of the region. Ethnographic research indicates that after the founding of Los Angeles, the Native American settlement of Yanga was forcibly moved, and by 1813 Native Americans in the area had regrouped to the south. This new village, known as *Rancheria de los Poblanos*, was located near the northwest corner of Los Angeles and First Street, approximately 1.5 miles northwest of the project site (Morris et al 2016). This second village site was only occupied until about 1836, after which Native American communities in Los Angeles were relocated gain east of the Los Angeles River. After 1836, Native Americans were again forcibly relocated another three times, in 1845, 1846, and 1847 (Morris et al. 2016: 94).

Another historical-era Native American village, known as *Ranchería de los Pipimares*, was located on the west side of San Pedro Street and 7th Street (Morris et al. 2016), approximately 1 mile south of *Ranchería de los Poblanos* and 0.6 miles west of the present project site. This village, formed in the late 1820s, was occupied primarily by Island Gabrieleño who relocated to Los Angeles— the term *Pipimares* originally referred to people from Santa Catalina Island, but later became a term for Island Gabrieleño in general. In 1846, the village was forcibly relocated following a petition sent to the Los Angeles City Council by neighboring landowners (Morris et al. 2016: 97-98).

Based on review of pertinent academic and ethnographic information, the project falls within the boundaries of the Gabrieleño/Tongva traditional use area and no Native American TCRs have been previously documented in areas that may be impacted by the project.

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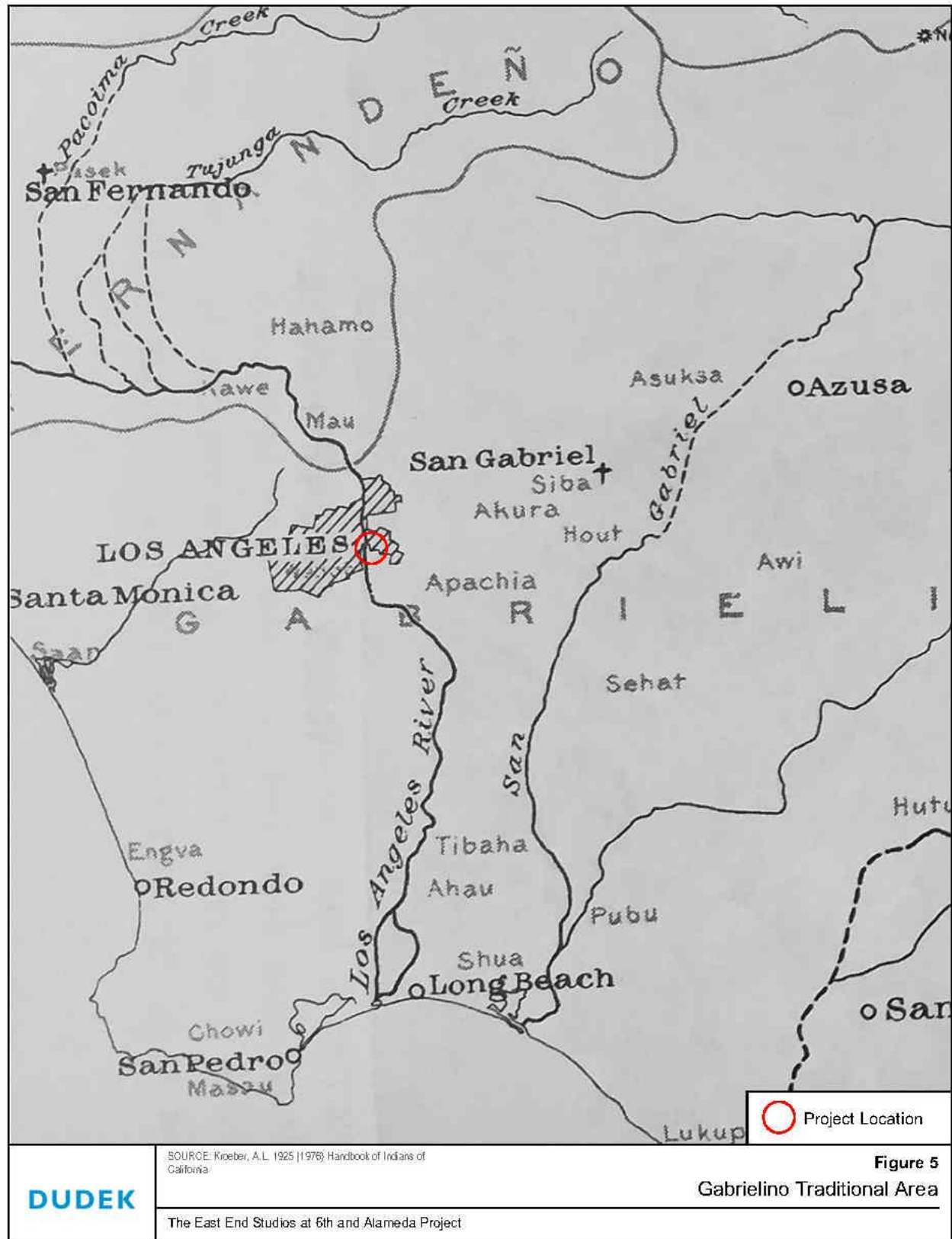
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6 FINDINGS AND RECOMMENDATIONS

6.1 Summary of Impacts to Tribal Cultural Resources

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 (Pub. Resources Code, § 21084.2.). AB 52 requires a TCR to have tangible, geographically defined properties that can be impacted by an undertaking. No confirmed Native American resources have been identified within the project area or a surrounding 0.5-mile search radius through the records search completed (August 10 and 14, 2023) at the SCCIC or through a search of the NAHC SLF (completed September 27, 2017). No TCRs have been identified within the project site through tribal consultation that would be impacted. Based on current information, impacts to TCRs would be less than significant.

6.2 Recommendations

An appropriate approach to potential impacts to TCRs is developed in response to the identified presence of a TCR by California Native American Tribes through the process of consultation. Government to government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a TCR within or near the project area. Given that no TCR has been identified, no specific mitigation measures pertaining to known TCRs are necessary.

While no TCRs are anticipated to be affected by the project, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resources. Should a potential tribal cultural resource be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that a potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resource monitoring plan and once the plan is approved by the City, ground disturbance activities could recommence. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. As a result, potential impacts to TCRs would continue to be less than significant.

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APPENDIX A

CONFIDENTIAL SCCIC Records Search

This confidential report is on file with
the Department of City Planning.

APPENDIX B

NAHC SLF Search Results

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916) 373-3710



September 27, 2017

Adriane Dorrlor
Dudek

Sent by E-mail: adorrlor@dudek.com

RE: Proposed Sixth and Alameda (#10633) Project, City of Los Angeles; Los Angeles
Quadrangle, Los Angeles County, California

Dear Ms. Dorrlor:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* was completed for the area of potential project effect (APE) referenced above with negative results however the area is sensitive for cultural resources. Please note that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.

Attached is a list of tribes culturally affiliated to the project area. I suggest you contact all of the listed Tribes. If they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact via email: gayle.totton@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Gayle Totton".

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

Native American Heritage Commission
Native American Contact List
Los Angeles County
9/27/2017

**Gabrieleno Band of Mission
Indians - Kizh Nation**

Andrew Salas, Chairperson
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gabrielenoindians@yahoo.com
Gabrieleno

**Gabrieleno/Tongva San Gabriel
Band of Mission Indians**

Anthony Morales, Chairperson
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Gabrieleno

Gabrielino /Tongva Nation

Sandonne Goad, Chairperson
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#231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com
Gabrielino

**Gabrielino Tongva Indians of
California Tribal Council**

Robert Dorame, Chairperson
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Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com
Gabrielino

Gabrielino-Tongva Tribe

Charles Alvarez,
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Phone: (310) 403 - 6048
roadkingcharles@aol.com
Gabrielino

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

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