

An architectural rendering of a modern multi-story residential building. The building features a mix of light-colored panels and dark window frames. A central courtyard contains a rectangular swimming pool with a wooden deck, several lounge chairs, and a few trees. The building has multiple balconies and a glass-enclosed area on the ground floor. The overall style is contemporary and urban.

*Appendix 4.14-1:
Tribal Resources Assessment*



TECHNICAL MEMORANDUM

To: Greg Tsujiuchi and Lisa Kranitz, City of Gardena

From: Jessica Mauck and Rita Garcia

Date: November 2, 2023

Subject: **Tribal Cultural Resources Technical Memorandum for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California Updates Peer Review**

Kimley-Horn has conducted a follow-up third-party peer review of the Project's Tribal Cultural Resources Technical Memorandum (SWCA Environmental Consultants, October 2023) on behalf of the City of Gardena to verify that BCR Consulting's January 26, 2023 third-party peer review Technical Memo (TM) recommendations have been incorporated. The revised October 2023 Technical Report Memorandum addressed the third-party peer review comments and thus is in compliance with the TM recommendations. The analysis, as revised, meets the applicable provisions of CEQA and the State CEQA Guidelines and is adequate for inclusion in the Project EIR.

Please do not hesitate to contact Rita Garcia at 714.786.6116 or rita.garcia@kimley-horn.com with any questions.

TECHNICAL MEMORANDUM

To: Fred Shaffer, President
Saiko Investment Corp.
1590 Rosecrans Avenue, Suite D-303
Manhattan Beach, California 90266

From: Liz Denniston, Senior Cultural Resources Team Lead

Date: October 24, 2023

Re: **Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California / SWCA Project No. 66768**

INTRODUCTION AND PROJECT SUMMARY

16911 Normandie Associates, LLC (the project applicant) retained SWCA Environmental Consultants (SWCA) to prepare a tribal cultural resources review in support of the proposed 16911 Normandie Project (also known as the Normandie Crossing Specific Plan Project) (project) in the city of Gardena and county of Los Angeles, California. The project applicant proposes to construct a seven-level apartment building on a 5.25-acre site located at 16829, 16835, 16907, and 16911 South Normandie Avenue (project site). The proposed project consists of a 403-dwelling unit multi-family residential development divided into two subareas. Subarea A, in the northern portion of the project site, would contain 328 apartment units in one seven-story building and associated open space and amenities. Onsite vehicle parking (approximately 399 spaces) and bicycle parking (173 spaces) are proposed in the building's first two levels. Subarea B, in the southern portion of the project site, would contain 75 townhome-style units in nine three-story buildings, and open space and amenities. Parking would include 150 spaces in attached garages, and 10 guest spaces. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling trucks, and a drill. The maximum anticipated depth of excavation below the existing surface grade is estimated at 6 feet. The City of Gardena (the City) is the lead agency under California Environmental Quality Act (CEQA) for the project.

The proposed project is plotted in an unsectioned portion Township 3 South, Range 14 West as depicted on the U.S. Geological Survey (USGS) Hollywood, California, 7.5-minute topographic quadrangle (Figure A-1).¹ The project area is in the city of Gardena on a 5.25-acre parcel, including the following Assessor's Parcel Numbers (APNs): 6106-030-011, 6106-030-015, 6106-030-016, and 6106-030-017. The site is bounded to the north by 169th Street, to the west by Brighton Way, to the south by West 170th Street, and to the east by South Normandie Avenue (Figure A-2).

¹ All figures are presented in Attachment A.

This memorandum provides a review of available evidence for known tribal cultural resources within the project site and analyzes the likelihood (i.e., sensitivity) for as-yet-unknown tribal cultural resources that could be present in the project site in the form of buried archaeological deposits. The results of this review are intended to provide a means of assessing the potential for impacts to tribal cultural resources in accordance with the significance thresholds in Appendix G of CEQA Guidelines.

SWCA reviewed the results of California Historical Resources Information System (CHRIS) and Sacred Lands File (SLF) searches, neither of which identified any known resources within the project site. Public Resources Code (PRC) Section 21082.3.1, as amended by Assembly Bill 52 (AB 52), requires the lead agency to begin consultation with culturally and geographically affiliated California Native American tribes prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As the project is still in its initial phase, notification letters to tribes have not yet been sent.

Although not all tribal cultural resources are archaeological in nature, those preserved below the surface would likely fit the definition of both an archaeological and tribal cultural resource. Similarly, the evaluation of a tribal cultural resource must consider the cultural values to a California Native American tribe, in addition to scientific and archaeological considerations. Accordingly, SWCA's assessment focuses exclusively on the scientific and archaeological sources of evidence, consistent with standard industry practices, and the analysis of the sensitivity for buried tribal cultural resources considers only those that are archaeological in nature.

In the absence of any previous geotechnical studies for the project site, SWCA relied on online soil and geologic map data from the USGS. SWCA's review found that while there are known, significant Native American village sites located in the general vicinity, such as Amupubit and Jautibit, the project site is set within what was once a broad floodplain of the Los Angeles River and Dominguez Slough. Although sediments associated with these floodplains are relatively favorable for preservation of buried tribal cultural resources, Older Surficial (abbreviated Qae) alluvium, dating to greater than 12,500 years before present (BP), is mapped within the project site (Dibblee and Minch 2007). Given the age of this formation, intact, naturally buried archaeological resources are not expected. Additionally, the impacts to the near-surface from historic period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on these findings, the sensitivity for tribal cultural resources is considered low to moderate.

Although no known tribal cultural resources have been identified in the project site and the sensitivity is considered low to moderate, the location of a tribal cultural resource that is archaeological in nature is unpredictable and the potential for a resource to be present cannot be fully ruled out.

SWCA Cultural Resources Team Lead Aaron Elzinga, M.A., Registered Professional Archaeologist (RPA), Cultural Resources Archaeologist, Katie Dumm, M.Sc., RPA, and Senior Team Lead Liz Denniston, M.A., RPA conducted background research and co-authored the report. The report was reviewed for technical accuracy and quality assurance by SWCA Principal Archaeologist Michael Bever, Ph.D., RPA. Mr. Elzinga, Ms. Denniston, and Dr. Bever meet the Secretary of the Interior's Professional Qualification Standards for archaeology. Copies of the report are on file with SWCA's Pasadena office and the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

REGULATORY SETTING

State Regulations

Assembly Bill 52

Assembly Bill 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. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as one of the following:

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

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 on 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]).

AB 52 TRIBAL CONSULTATION

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC), whether or not they are federally recognized. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency makes a decision to undertake a project, the lead agency has 14 days to formally notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project site and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contact information for the agency contact, and notice that the tribe has 30 days to request, in writing, consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe’s request for consultation. Furthermore, consultation must be initiated prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

Consistent with the stipulations stated in Senate Bill 18 (Government Code Section 65352.4), consultation may include discussion concerning the type of environmental review necessary, the significance of the project's impacts on the tribal cultural resources, and, if necessary, project alternatives or the appropriate measures for preservation and mitigation that the California Native American tribe may recommend to the lead agency (PRC Section 21080.3.2[a]). The consultation shall be considered concluded when either the parties agree to measures mitigating or avoiding a significant effect, if one exists, on a tribal cultural resource; or a party, acting in good faith and after reasonable effort, concludes that agreement cannot be reached (PRC Section 21082.3.2[b]).

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

California Register of Historical Resources

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

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

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

Local Regulations

City of Gardena General Plan

The historical conservation element of the City of Gardena General Plan, adopted in 2006, includes Land Use (LU) Goal 4, intended to "provide the highest quality of public facilities possible to meet the needs of

the City’s residents and businesses and promote the City’s image and cultural heritage” (City of Gardena 2006). In support of this goal, eight policies were adopted. Among these, Policy LU 4.5 is to “encourage the preservation of historical and cultural locations and monuments to preserve the heritage of the City”.

ENVIRONMENTAL SETTING

This project site is located in the northwestern portion of the Peninsular Ranges Geomorphic Province. The site is within the Los Angeles Basin, a broad, level coastal and alluvial plain defined by the Pacific Ocean to the south and west, the Santa Monica Mountains to the northwest, the Puente Hills to the northeast, and the Santa Ana Mountains to the east. Within this extensive alluvial plain, the project site is situated on an uplifted marine alluvium and terrace landform, with remnant alluvial fans and uplifted alluvium and estuarine deposits. Several major watercourses drain the Los Angeles Basin, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The project site and vicinity are within a fully urbanized setting on an open-aspect plain at an elevation of approximately 12 meters (40 feet) above mean sea level. An 1896 topographic map shows that before urbanization, the project site was on a relatively level alluvial plain approximately 0.3 kilometer (km; 0.2 mile) northwest of Dominguez Slough. The site is approximately 0.6 km (0.4 mile) northwest of the Gardena Willows Wetland Preserve.

In the absence of any previous geotechnical studies for the project site, SWCA relied on online soil and geologic map data from the USGS. The project site is in the Qae unit for a characterization of the soil and geophysical setting. The sediments that form the Qae unit were deposited before approximately 12,500 years ago, during the late Pleistocene. Soils within the project site are described as unconsolidated to weakly consolidated alluvial sediments, characterized by alluvial gravel, sand, and clay (Dibblee and Minch 2007). The soils are further characterized as Windfetch loam with overly uplifted alluvium and terraces, varying from 8 centimeters to 2 meters (3–78 inches) deep and consisting of pale brown to dark brown, friable, moderate to blocky-textured clay loam.

CULTURAL SETTING

Prehistoric Period

In the last several decades, researchers have devised numerous prehistoric chronological sequences to aid in understanding cultural changes in southern California. Building on early studies and focusing on data synthesis, Wallace (1955, 1978) developed a prehistoric chronology for the southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas. Four Horizons are presented in Wallace’s prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although Wallace’s 1955 synthesis initially lacked chronological precision due to a paucity of absolute dates (Moratto 1984:159), this situation has been alleviated in the last three decades through radiocarbon dating by southern California researchers (Byrd and Raab 2007:217), and several revisions were subsequently made to Wallace’s 1955 synthesis using radiocarbon dates and projectile point assemblages (e.g., Koerper and Drover 1983; Koerper et al. 2002; Mason and Peterson 1994). The summary of prehistoric chronological sequences for southern California coastal and near-coastal areas presented below is a composite of information in Wallace (1955) and Warren (1968), as well as subsequent studies, including Koerper and Drover (1983).

Horizon I—Early Man (ca. 10,000–6000 B.C.)

Any discussion of human occupation of coastal areas during the terminal Pleistocene and Early Holocene must be prefaced with an understanding that sea level rise during this period of shifting climate inundated many kilometers of shoreline worldwide. Therefore, any evidence of human occupation in a present-day coastal setting is likely only a small fraction of what originally existed. The earliest evidence for human

occupation in California is found on the northern Channel Islands, off the coast of Santa Barbara, in the Southern California Bight. Multiple Terminal Pleistocene sites have now been dated on California's Northern Channel Islands, firmly establishing the presence of early coastal-adapted people in the region (Erlandson and Braje 2008; Erlandson et al. 1996; Erlandson et al. 2011). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002) and recent excavations and radiometric dating of multiple archaeological assemblages on Santa Rosa (Erlandson et al. 2011) and San Miguel islands document Paleoindian technologies, subsistence strategies, and seasonality of site occupation during the latter part of the terminal Pleistocene (approximately 11,700 cal. BP) with similarities to the Western Stemmed Tradition found across much of western North America.

Similarly, early sites were likely present on the mainland California coast; however, the rate and degree of development beginning with European colonization and continuing to the present has likely destroyed most early sites along the California mainland coast. Nevertheless, present-day Orange and San Diego Counties contain several sites dated to the Early Holocene—9,000 to 10,000 years ago (Byrd and Raab 2007:219; Macko 1998:41; Mason and Peterson 1994:55–57; Sawyer and Koerper 2006); radiocarbon dates from the Goleta Slough area indicate occupations spanning ca. 9300–8400 cal. BP, with a primary subsistence focus on lagoon-bay shellfish (Owen et al. 1964). Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin apparently date to the Middle Holocene, if not earlier (Brooks et al. 1990; Erlandson et al. 2007:54).

Recent data from Horizon I sites on the mainland indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (e.g., Jones et al. 2002), and a greater emphasis on large-game hunting inland. Fundamental elements of lithic tool technology described by Wallace (1955) for this period include numerous scrapers, choppers, chipped and notched crescents, and large blades and points. Wallace also describes deposits from Malaga Cove comprising clam shell beads and bone beads, along with an absence of seed-grinding implements from the site type for this period.

Horizon II—Milling Stone (6000–3000 B.C.)

Horizon II (or the Milling Stone Horizon) corresponds to the Early Holocene when rising sea levels continued to encroach on coastlines, though global climate was slowly stabilizing. Set during a warmer and drier climatic regime than Horizon I, the Milling Stone Horizon is characterized by subsistence strategies centered on collecting plant foods and small animals; however in coastal areas where archaeological assemblages have been preserved, there is ample evidence of marine resource use during this time period as well (Connolly et al. 1995; Rick et al. 2001). The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and hand stones (manos) (Erlandson 1991, 1994; Moriarty 1966; Warren 1967). The variety of site types from this period indicate a mobile settlement pattern and recent research indicates that Milling Stone Horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (Byrd and Raab 2007:220).

Milling stone assemblages are characterized by the extensive use of milling stones and mullers along with a general lack of finely crafted projectile points, though leaf-shaped points believed to be darts are present. The lack of bone and shell tools at some sites dated to this time period has led some researchers to suggest a stronger reliance on plant food resources. Several site types have been described for this Horizon throughout southern California, including Topanga Canyon, Little Sycamore in Ventura, the La Jolla shell mounds, Porter Ranch in San Fernando, Zuma Creek, and Encino Village.

Horizon III—Intermediate (3000 B.C.–A.D. 500)

Horizon III corresponds with the Middle Holocene and early Late Holocene time periods geologically, and marks the point when current shorelines were established in most parts of the world. Consequently, evidence for marine resource use appears to increase after 5,000–6,000 years ago. The Intermediate Horizon is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this Horizon along the California coast. Related chipped stone tools suitable for hunting, including side-notched projectile points, are more abundant and diversified, and shell fishhooks became part of the toolkit during this period. Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment and signaling a shift away from the processing and consuming of hard-shelled seed resources to the increasing importance of fleshier fruits like the acorn (e.g., Glassow et al. 1988; True 1993).

Technological markers described by Wallace (1955) for Horizon III consist of basket-hopper mortars, mortars and pestles, and diverse and plentiful chipped stone assemblages with broad leaf-shaped blades and heavy, often stemmed, projectile points. Bone and antler tools are present to some degree but not in the quantity seen during later phases, along with occasional use of bitumen (asphaltum) and steatite. Faunal assemblages often include terrestrial mammals representing wild game, along with some marine mammal bones and often high densities of shellfish remains.

The Middle Holocene also marks a time of cultural innovation in the archaeological record of California. Significant cultural developments are seen in the increasing formation of larger settlements, the intensification of long-distance trade networks including distinct cultural spheres throughout western North America, and the elaboration of art and personal aesthetics (e.g., shell and stone pendants and an increasing variety of shell bead types and styles) (Erlandson and Glassow 1997; Glassow 1997; Howard and Raab 1993; Jenkins and Erlandson 1996; King 1990; Raab and Howard 2002; Vellanoweth 2001).

Horizon IV—Late Prehistoric (A.D. 500–1769)

In the Late Prehistoric Horizon, there was an increase in the use of plant food resources in addition to an increase in terrestrial and marine mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric Horizon, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely crafted projectile points suggests increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Steatite cooking vessels and containers are also present in sites from this time, and there is an increased presence of composite bone gorges and circular shell fishhooks, perforated stones, arrow shaft straighteners made of steatite, a variety of bone tools, and personal ornaments such as beads made from shell, bone, and stone. *Olivella* shell bead styles include a variety of wall and callus beads in addition to the previous spire-lopped and cup beads. There was also an increased use of asphaltum (also known as bitumen) for waterproofing basketry, caulking canoes, and as an adhesive.

Technological markers of this Horizon as described by Wallace (1955) include the increased use of the bow and arrow, stemless points with concave or convex bases, steatite containers, widespread use of asphaltum as an adhesive, increased abundance and types of bone tools, as well as shell, bone, and stone ornaments. Wallace also describes notable distinctions between northern and southern groups during this period, including less pottery north of Orange County, where steatite vessels were more prevalent, and the presence of portable mortars and pestles and basket-hopper slabs in the north, with bedrock mortars and milling stones more prevalent in the San Diego area.

By A.D. 1000, fired-clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites

implies that ceramic technology was not well developed in that area, or that occupants were trading with neighboring groups to the south and east for ceramics. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that was caulked with bitumen (asphaltum) and functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages (Wallace 1955:223), particularly at the mouths of large mainland coastal canyons and drainages with year-round water supplies (McLendon and Johnson 1999). Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In Warren's (1968) cultural ecological scheme, the period between A.D. 500 and European contact, which occurred as early as 1542, is divided into three regional patterns: Chumash/Canaliño (Santa Barbara and Ventura Counties), Takic/Numic (Los Angeles, Orange, and western Riverside Counties), and Yuman (San Diego County). The seemingly abrupt introduction of cremation burial practices, pottery, and small triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside Counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino, Juaneño, and Luiseño people in this region are considered the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast in this period.

Ethnographic Overview

The project site is in an area historically occupied by the Gabrielino (Bean and Smith 1978:538; Kroeber 1925: Plate 57). Surrounding Native groups included the Chumash and Tataviam/Alliklik to the north, the Cahuilla to the east, Serrano to the northeast, and the Luiseño/Juaneño to the south and southeast. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name "Gabrielino" (sometimes spelled Gabrieleno or Gabrieleño) denotes those people who were administered by the Spanish from Mission San Gabriel. This group is now considered a regional dialect of the Gabrielino language, along with the Santa Catalina Island and San Nicolas Island dialects (Bean and Smith 1978:538). In the post-European contact period, Mission San Gabriel included Natives of the greater Los Angeles area, as well as members of surrounding groups such as Kitanemuk, Serrano, and Cahuilla. There is little evidence that the people we call Gabrielino had a broad term for their group (Dakin 1978:222); rather, they identified themselves as an inhabitant of a specific community with locational suffixes (e.g., a resident of Yaanga was called a Yabit, much the same way that a resident of New York is called a New Yorker; Johnston 1962:10).

Native words suggested as labels for the broader group of Native Americans in the Los Angeles region include Tongva (or Tong-v; Merriam 1955:7–86) and Kizh (Kij or Kichereno; Heizer 1968:105), although there is evidence that these terms originally referred to local places or smaller groups of people within the larger group that we now call Gabrielino. Nevertheless, many present-day descendants of these people have taken on Tongva as a preferred group name because it has a Native rather than Spanish origin (King 1994:12). The term Gabrielino is used in the remainder of this report to designate Native people of the Los Angeles Basin and their descendants.

The Gabrielino 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). Inhabitants

supplemented acorns with the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978:546; Kroeber 1925:631–632; McCawley 1996:119–123, 128–131).

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

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

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996:157). Remains were buried in distinct burial areas, either associated with villages or without apparent village association (Altschul et al. 2007). Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966:27), as well as scattered among broken ground stone implements (Cleland et al. 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a 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 (Dakin 1978:234–365; Johnston 1962:52–54; McCawley 1996:155–165).

Native American Communities in Greater Los Angeles

In general, it has proven very difficult or impossible to establish definitively the precise location of Native American villages occupied in the Ethnohistoric period (McCawley 1996:31–32). Native American place names referred to at the time of Spanish contact did not necessarily represent a continually occupied settlement within a discrete location. Instead, in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features subject to change over generations (see Johnston 1962:122). Many of the villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point the former village sites were affected by urban and agricultural development, and Native American lifeways had been irrevocably changed. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference, further confound efforts at relocation. McCawley quotes Kroeber (1925:616) in his remarks on the subject, writing that “the opportunity to prepare a true map of village locations ‘passed away 50 years ago’” (McCawley 1996:32). Thus, even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Historic Period

Post-contact history for the state of California is generally divided into three periods: the Spanish period (1769–1822), Mexican period (1822–1848), 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.

Spanish Period (1769–1822)

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 1886:96–99; Gumprecht 2001:35).

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 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 Juan Crespi, a member of the expedition, named the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula or “Our Lady the Queen of the Angels of the Porciúncula.” Two years later, Fr. Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Engelhardt 1927). 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”).

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.

Mexican Period (1822–1848)

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.

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. The secularization of the missions 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 non-Native 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.

American Period (1848–Present)

War in 1846 between Mexico and the United States began at the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. This battle was a defeat for the Americans and bolstered the Californios' resolve against American rule, emboldening them to continue the offensive in later battles at Dominguez Field and in San Gabriel (Beattie 1942). However, this early skirmish was not a sign of things to come and the Americans were ultimately the victors of this 2-year war. The Mexican–American War officially ended with the Treaty of Guadalupe Hidalgo in 1848, which resulted in the annexation of California and much of the present-day Southwest, 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. 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; 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 neighboring 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 1941).

On April 4, 1850, only 2 years after the Mexican–American War and 5 months prior to California's achieving statehood, Los Angeles was officially incorporated as an American city. Settlement of the Los Angeles region continued steadily throughout the Early American period. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's acquiring official statehood in the United States. At that time, the city was bordered on the north by the Los Felis and the San Rafael Land Grants and on the south by the San Antonio Luge Land Grant. 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).

Ranching retained its importance through the mid-nineteenth century, and by the late 1860s, Los Angeles was one of the top dairy production centers in the country (Rolle 2003). By 1876, the county had a population of 30,000 (Dumke 1944:7). 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).

As the population of Los Angeles continued to expand throughout the Mexican period, the transition of many former rancho lands to agriculture, as well as the development of citriculture in the late 1800s, became a draw for many. 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. The same real estate and population surge provided opportunities for the settlement and development of communities, such as Gardena, well beyond the city core of Los Angeles.

CITY OF GARDENA

The City of Gardena is a community within the South Bay region of Los Angeles County. The city traces its roots to the 1880s, when Spencer R. Thrope of Ventura, California, reportedly started a settlement near what is now Alondra Boulevard and Figueroa Street, near the intersection of 161st Street and Figueroa. However, Gardena's true founder was later confirmed to be real estate businessman and developer, Abram Ehle Pomeroy. Pomeroy was the first to advertise and market the area to would-be land buyers interested in developing orchards and gardens (City of Gardena 2016). How the city got its name is unclear; perhaps because it was considered to be a beautiful garden spot due to the fertile valley created by the Laguna Dominguez slough nearby. The City was incorporated on September 11, 1930, nearly 50 years after the first settlers moved to the area, consolidating the surrounding communities of Gardena, Strawberry Park, and Moneta (City of Gardena 2016). At that time the city was a farming community of approximately 20,000 people. Gardena is what is known as a General Law City, which under California law means that there is no city charter other than the laws, resolutions, and ordinances adopted and passed by the City Council and the "appropriate statutes" of the State of California.

HISTORICAL DEVELOPMENT OF THE PROJECT SITE

The following provides an overview of the project site history. A detailed history of the project site can be found in the Historical Resources Assessment (Howell-Ardila and Zamudio-Gurrola 2023).

The project site is in the south-central portion of the City's boundary when it was incorporated in 1930, which is situated in what was once the 43,000-acre Spanish land grant known as Rancho San Pedro. Apart from the presence of late-nineteenth century irrigation infrastructure within the project site (see Hall 1888), the former rancho lands remained mostly undeveloped agricultural land until the early to mid-twentieth century. The establishment of the Southern Pacific Railroad to the north of the project site by 1896 spurred an increase in development of the region in the early to middle part of the twentieth century.

By 1924, a segment of the Pacific Electric passenger rail line (also known as the “Red Cars”) is present along the eastern edge of the project site, along with Normandie Avenue; 170th Street appears along the southern boundary of the project site. Sometime between 1924 and 1927, at least one building is present in the southwest corner of the project site and one residential plot is present within the northern portion (Figure A-8). Both development areas appear to be associated with agricultural uses within the project site. The project site remained largely undeveloped until after about 1941, when the structures in the southwest corner were altered, and the residential property within the northern portion was demolished and warehouses began being constructed within the property boundary. By 1971, all but two of the buildings currently occupying the project site are present (Figure A-9), with one previous building having been demolished and removed. Further warehouse construction occurred in the mid-to late twentieth century, and by the end of the twentieth century the entire area was either developed or paved over. Assessor records document that most of the buildings on the parcel were constructed between 1952 and 1967.

CHRIS RECORDS SEARCH

SWCA requested a CHRIS records search at the South Central Coastal Information Center (SCCIC) on the campus of California State University, Fullerton, to identify previously documented archaeological resources within a 0.8-km (0.5-mile) radius of the project site. The SCCIC maintains records of previously documented archaeological resources (including those that meet the definition of a tribal cultural resource) and technical studies; it also maintains copies of the California Office of Historic Preservation’s (OHP’s) portion of the Historic Resources Inventory. Confidential CHRIS results include specific information on the nature and location of sensitive archaeological sites, which should not be disclosed to the public or unauthorized persons and are exempt from the Freedom of Information Act. The information included in a confidential CHRIS records search is needed to assess the sensitivity for undocumented tribal cultural resources and inform the impact analysis. The search included any previously recorded archaeological resources (i.e., excluding historic buildings) within the project site and surrounding 0.8-km (0.5-mile) area.

SWCA obtained the results of the CHRIS records search from the SCCIC on December 21, 2021 and a copy of the results are included here as part of a confidential attachment (Attachment B). The results indicated that 13 cultural resource studies have been conducted within 0.8 km (0.5 mile) of the project site. None of these studies directly intersected the project site or included an assessment of tribal cultural resource sensitivity relevant to the current study.

No tribal cultural resources were identified in the CHRIS records search, though seven resources were identified within a 0.8-km (0.5-mile) radius. None of the seven resources overlap the project area. Five of the previously recorded resources consist of historic sites or historic built environment resources. The remaining two resources, P-19-000088 and P-19-000101, are prehistoric archaeological sites. The historic-age resources are the Dominquez Slough (P-19-177369), the Gardena Department Store Building (P-19-177464), the Gardena Senior High School (P-19-190006), SCE Tower (P-19-190646), and a residential structure (P-19-192741).

The prehistoric sites are P-19-000088/CA-LAN-88 and P-19-000101/CA-LAN-101. Site P-19-000088 (also known as “Racer’s Site #14”) was described as a “small site on bank of slough,” and consisted of a shell midden, flint chips, and broken manos (Racer 1939:3). Site P-19-000101 (also known as “Racer’s Site #13”) was described as an artifact scatter with a burial (Racer 1939:2). Both were recorded in 1939 and collectively referred to as “Indian Camp Sites in the Harbor District.” Their current condition is unknown but given the amount of development that has since occurred in the area, it is doubtful they still exist.

NATIVE AMERICAN COORDINATION

Sacred Lands File Search

On December 3, 2021, SWCA requested a search of the SLF from the NAHC. SWCA received the results of the SLF search from the NAHC on January 25, 2022. The NAHC's SLF results letter indicated negative findings. In the response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of tribal cultural resources within the project site, and that the CHRIS and SLF are not exhaustive. The NAHC's response to SWCA's request included a list of nine Native American contacts who may have knowledge of cultural resources in or near the study area and recommended they be contacted prior to work. The SLF results letters are included in Attachment C.

Tribal Consultation

As the lead agency under CEQA, the City is responsible for Native American consultation pursuant to AB 52. Since the project is still in its initial phase, notification letters to tribes have not yet been sent.

SENSITIVITY ASSESSMENT

Methods

Although not all tribal cultural resources are archaeological in nature, those likely to be preserved below the surface are likely to fit the definition of an archaeological and tribal cultural resource. Similarly, the evaluation of a tribal cultural resource must consider the cultural values to a California Native American tribe, in addition to scientific and archaeological considerations. This section assesses the potential (i.e., sensitivity) for tribal cultural resources that are archaeological in nature to be preserved below the surface of the project site. This sensitivity assessment considers archaeological, ethnographic, historical, environmental, and other archival data sources. Evidence from these sources is used to estimate whether the location was favorable for Native American habitation, the environmental setting within the last 13,000 years, land uses within region, and any alterations to the physical setting within the project site that may have occurred from natural causes or historic-period developments and influenced the potential for preserving buried materials.

Where sites are fully paved or otherwise developed and directly testing for such buried materials is not feasible, indirect evidence is used. For this reason, the resulting sensitivity assessment is qualitative by nature—ranging along a spectrum of increasing probability—designated here as low, moderate, and high. Indicators of favorable habitability for Native American sites are proximity to certain natural features (e.g., perennial water source, plant or mineral resource, animal habitat), flat topography, and historically dry conditions (i.e., not directly within standing water). The assessment also considers whether the general location is described in ethnographic studies and oral histories, and whether the area of interest is similar to the physical setting in which other Native American archaeological sites have been identified. Next, the sensitivity assessment considers whether the location is capable of containing buried deposits, including whether there are natural or historic period developments that have eroded, displaced, or otherwise destroyed any potential materials that may have once been present. Areas with a favorable setting for habitation or temporary use, soil conditions capable of preserving buried material, and little to no disturbances are considered to have a high sensitivity. Areas lacking these traits are considered to have low sensitivity. Areas with a combination of these traits are considered as having moderate sensitivity.

Historical maps drawn to scale were georeferenced using ESRI ArcMAP v10.5 to show precise relationships to the project site. Sources consulted included the following publicly accessible data sources: City of Los Angeles Office of Historic Resources (SurveyLA); City of Los Angeles Department

of Building and Safety (building permits); Library of Congress; Sanborn Fire Insurance Company Maps (Sanborn maps); USGS historical topographic maps; University of California, Santa Barbara Digital Library (aerial photographs); and University of Southern California Digital Library.

Results

No tribal cultural resources were identified within the project site as a result of the CHRIS records search or the NAHC's SLF search. Although the precise location of any given village is subject to much speculation, it is clear the greater Los Angeles area once contained many Gabriolino villages, including several concentrated along the banks of major waterways (Figure A-3 and Figure A-4). This settlement pattern is reflected in historical maps published by the Southwest Museum (1962; reprinted in Johnston 1962) and George Kirkman (1938), shown here with the project site plotted in Figure A-5 and Figure A-6, respectively. Maps such as these convey a general sense of significant historical areas based on the geographic information available at the time and are considered as a representational depiction of these locations rather than explicit geographic points.

The closest ethnographically documented village to the project site may be Amupubit, which is estimated to have been located approximately 2.4 km (1.5 miles) southeast of the project site (Figure A-7). Jautibit, another named ethnographic Native American settlement, has been mapped approximately 2.7 (1.7 miles) northeast and east-northeast of the project site. Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence for the location of Native American villages has been produced to date. The project site is in the vicinity of at least one previous Native American trade route (named "New Salt Road 1848–1878") to the north of the project site. A portion of the 1769 Portolá Expedition route is located approximately 17.3 km (10.7 miles) north of project site (see Figure A-6).

Generally speaking, prehistoric artifacts and sites are more likely to be found near sources of water. Water features including perennial springs and small wetlands are known to have existed just southeast of the project site. The site records noted above indicate that both prehistoric resources were located near or adjacent to the Dominguez Slough. The slough is located approximately 0.3 km (0.2 mile) to the southeast of the project site. A portion of the Dominguez Channel fed into the Laguna Dominguez river going southeast to the slough. As the previously documented sites indicate, areas such as this would have been frequented by Native Americans.

Historical land uses within the project site and surrounding area consisted primarily of ranching associated with the operation of Rancho San Pedro during the Spanish, Mexican, and Early American Periods. Ranching eventually gave way to agricultural land uses by the end of the nineteenth century, which included development of irrigation infrastructure. No evidence for specific intensive land uses within the project site were identified in archival sources before the 1920s. By 1927, aerial photographs show the project site developed with structures in the north and south that appear associated with agricultural land uses. The central portions of the site appear to have been subject to plow agriculture. These land uses are all likely to have disturbed the surface and near-surface sediments, which would have destroyed or displaced Native American objects that may have once been present. Between the 1940s and 1960s the project site was more intensively developed as buildings, structures, and various hardscaping elements were constructed, further altering the physical setting and reducing the likelihood of any tribal cultural resources being preserved in the near-surface.

Archaeological remains associated with prehistoric or historic-era Native Americans can exist below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such Native American archaeological resources within the project site or its immediate vicinity, most of the project site was not inspected for archaeological resources before being developed. However, the

project site consists of a comparatively small area within the greater region and has been subject to multiple episodes of ground disturbance. As a result, archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved within the project site, and though more deeply buried deposits could exist, SWCA considers the sensitivity for prehistoric and historic Native American archaeological resources to be low to moderate within the project site.

Deeply buried archaeological deposits can exist within alluvium below historic period disturbances and may also be intermixed with historic period debris. Alluvial deposits within the Los Angeles Basin can be massive, extending hundreds of feet below the surface and containing sediments deposited long before human presence in North America. Furthermore, most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, whereas low-energy floods tend to produce more favorable environments for the preservation of cultural materials. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered. Also, although such soil conditions are an indicator of a setting favorable for preservation, the presence of such soils alone is not an absolute indicator of the presence of tribal cultural resources. Qae alluvium, dating to greater than 12,500 years BP, is mapped within the project site (Dibblee and Minch 2007). Given the age of this formation, intact, naturally buried archaeological resources are not expected. Additionally, the impacts to the near-surface from historic period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on these findings, the sensitivity for tribal cultural resources at the project site is considered low to moderate.

STUDY CONSTRAINTS AND DISCLAIMER

In creating the category of tribal cultural resources, the legislative intent of AB 52 is expressly stated as seeking to consider “the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation” and to “recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated” (Gatto 2014). Analysis of tribal cultural resources in the absence of information provided by local tribes, therefore, is considered to be constrained insofar as the evidence considered may be confined to published, academic, and archaeological sources, and the conclusions can only be considered as representing scientific and archaeological values. The analysis and conclusions stated herein are based on the expertise and professional judgement of SWCA’s qualified archaeologists and are intended to present information that can be used in assessing the potential for tribal cultural resources under CEQA, and should not be considered a replacement for tribal expertise or assumed to represent tribal cultural values.

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ATTACHMENT A

Report Figures

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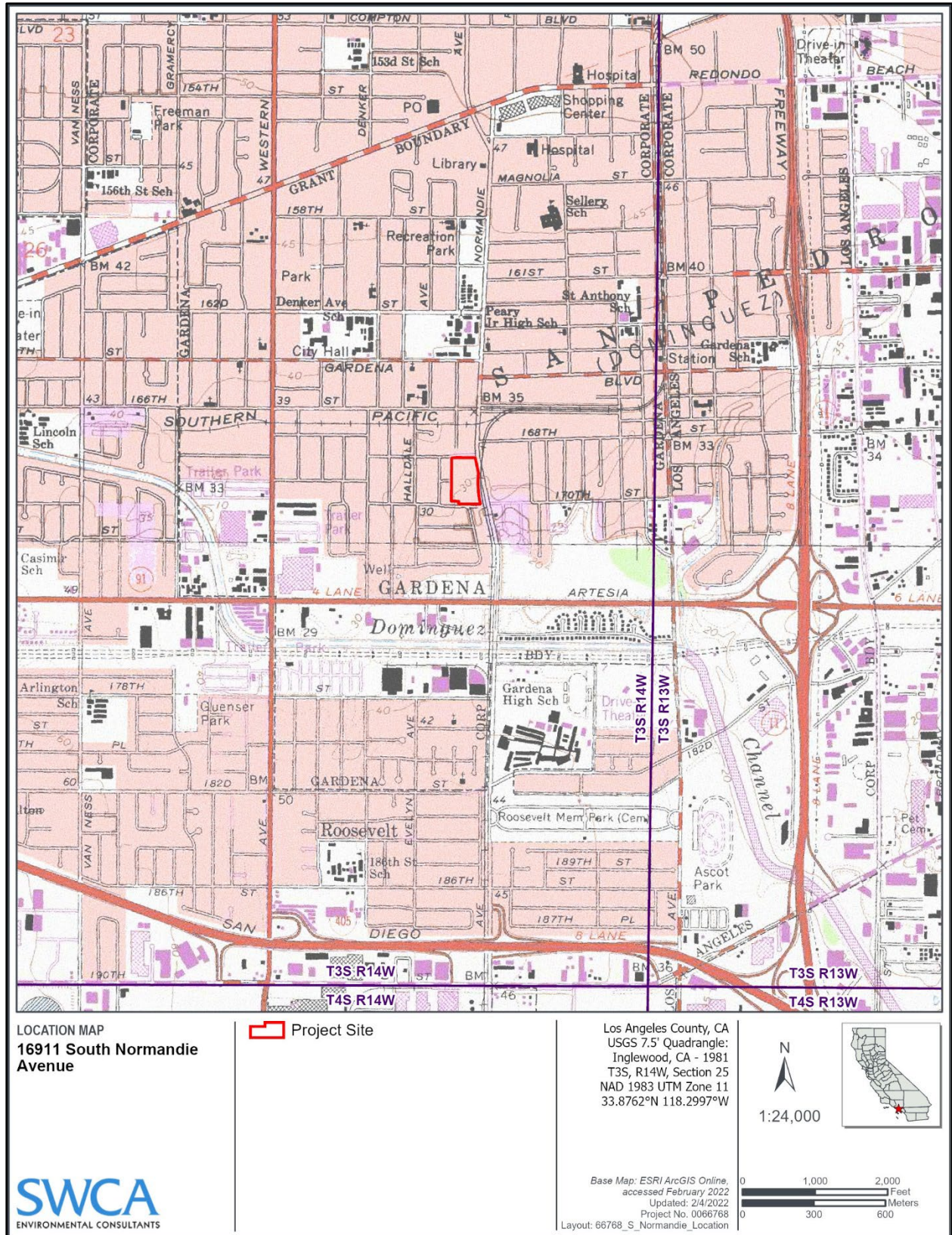


Figure A-1. Project site plotted on USGS Inglewood, California, 7.5-minute topographic quadrangle.



Figure A-2. Project site shown on a 2022 aerial photograph and street map.

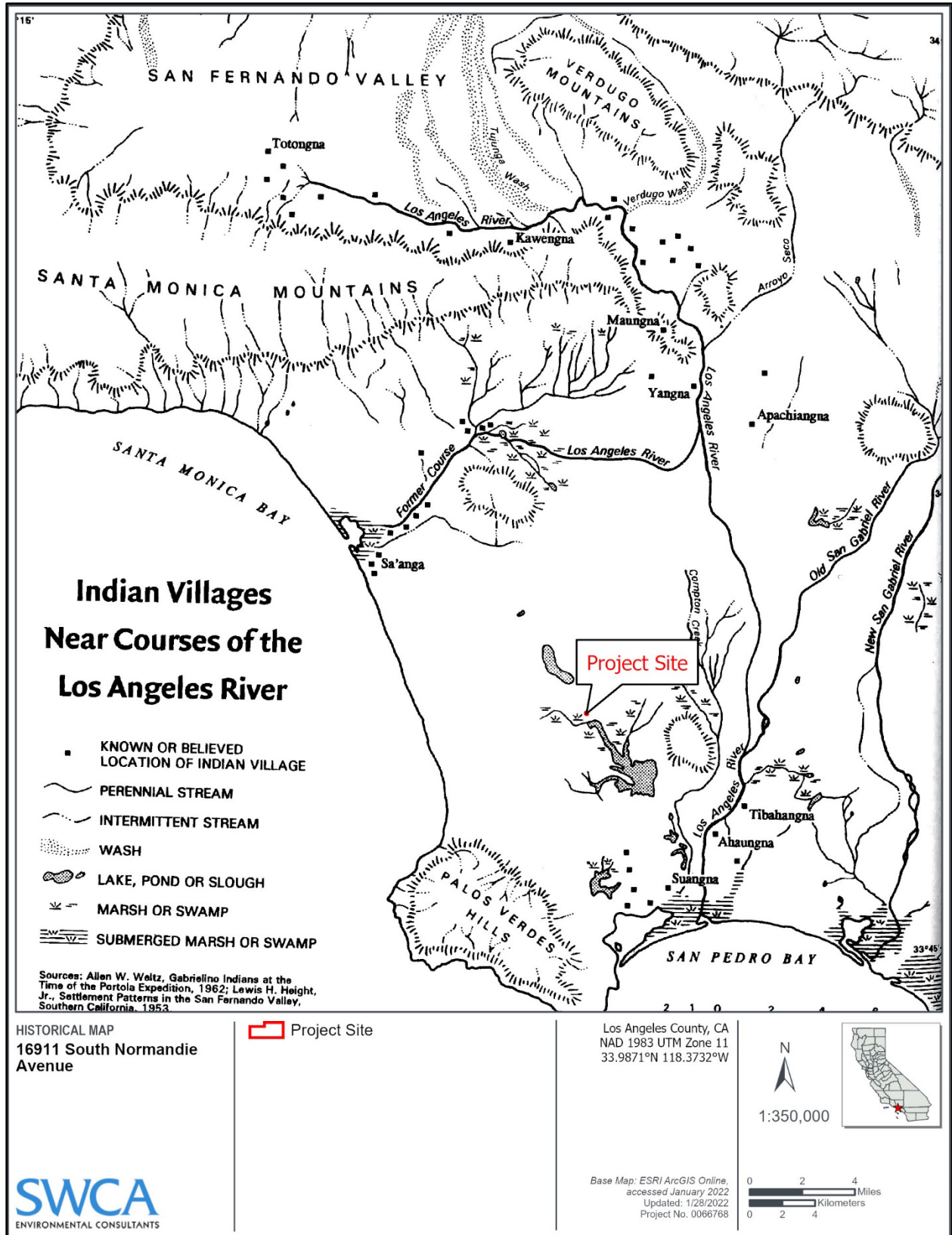


Figure A-3. Former courses of the Los Angeles River with map of villages cited in Gabrieliemo ethnographic sources (Gumprecht 2001).

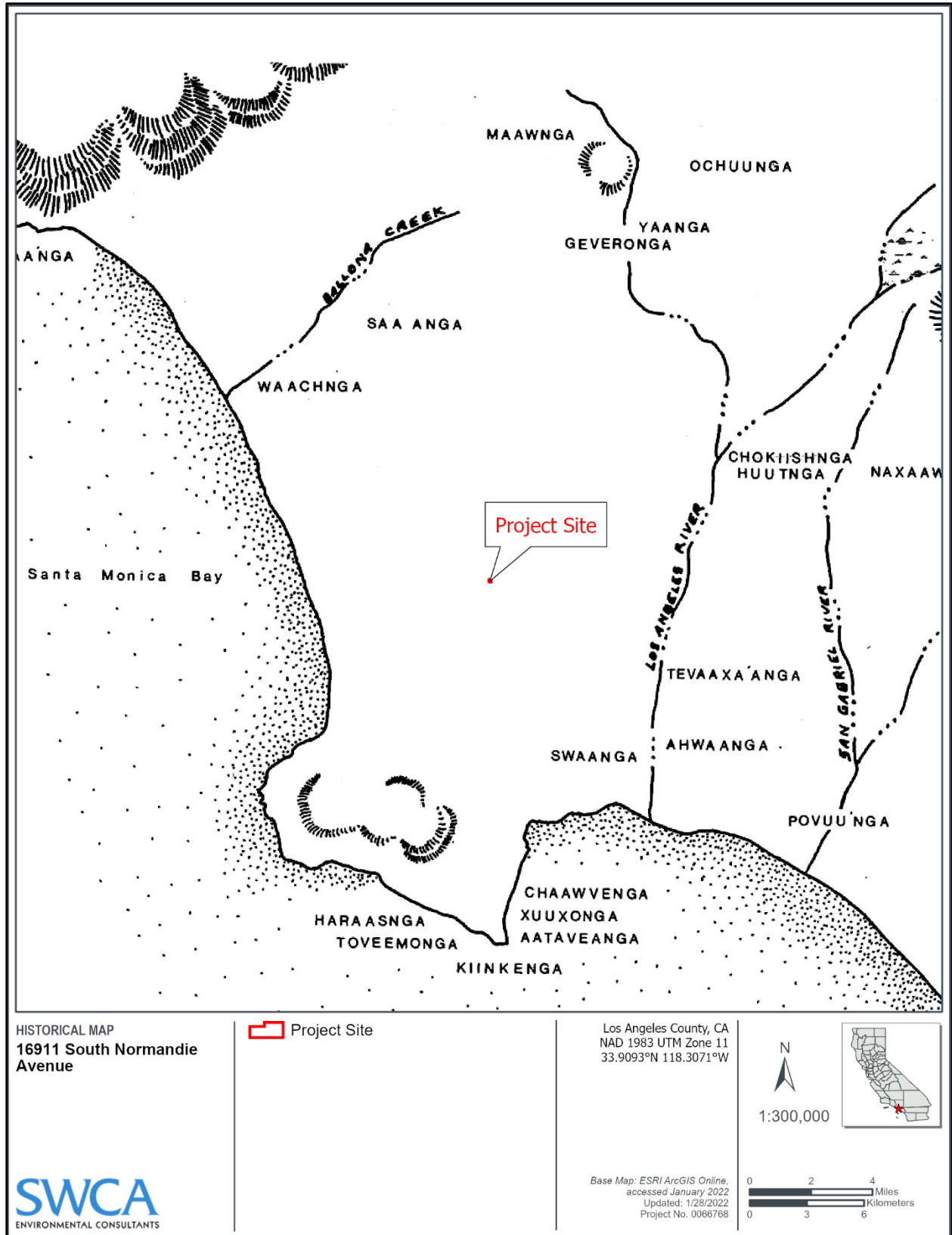


Figure A-4. Project site plotted on McCawley's (1996:36) map of villages cited in Gabrieliethnographic sources.

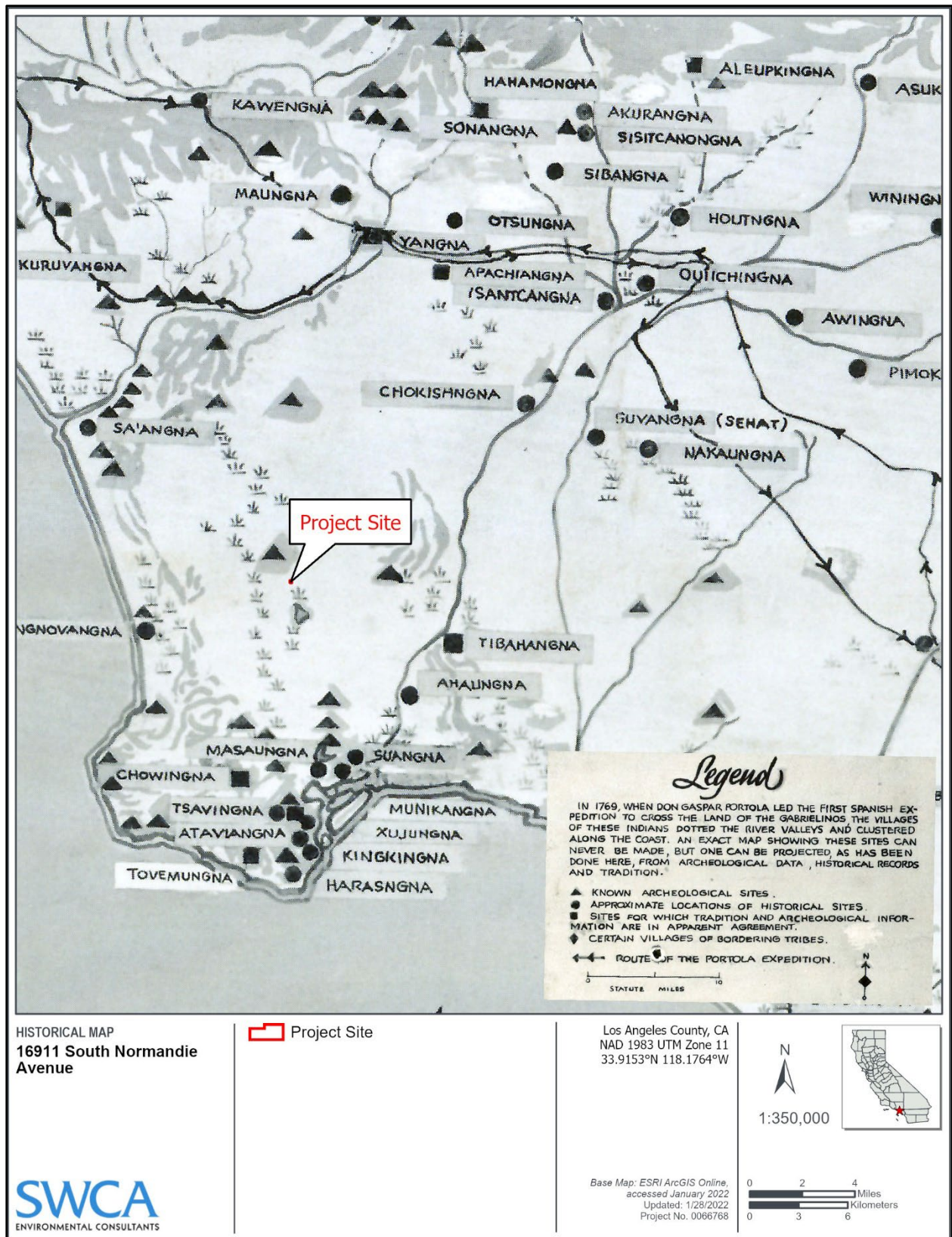


Figure A-5. Project site plotted on a map of Native American and historical sites in the Los Angeles Basin published by the Southwest Museum (1962) and reprinted in Johnston (1962).

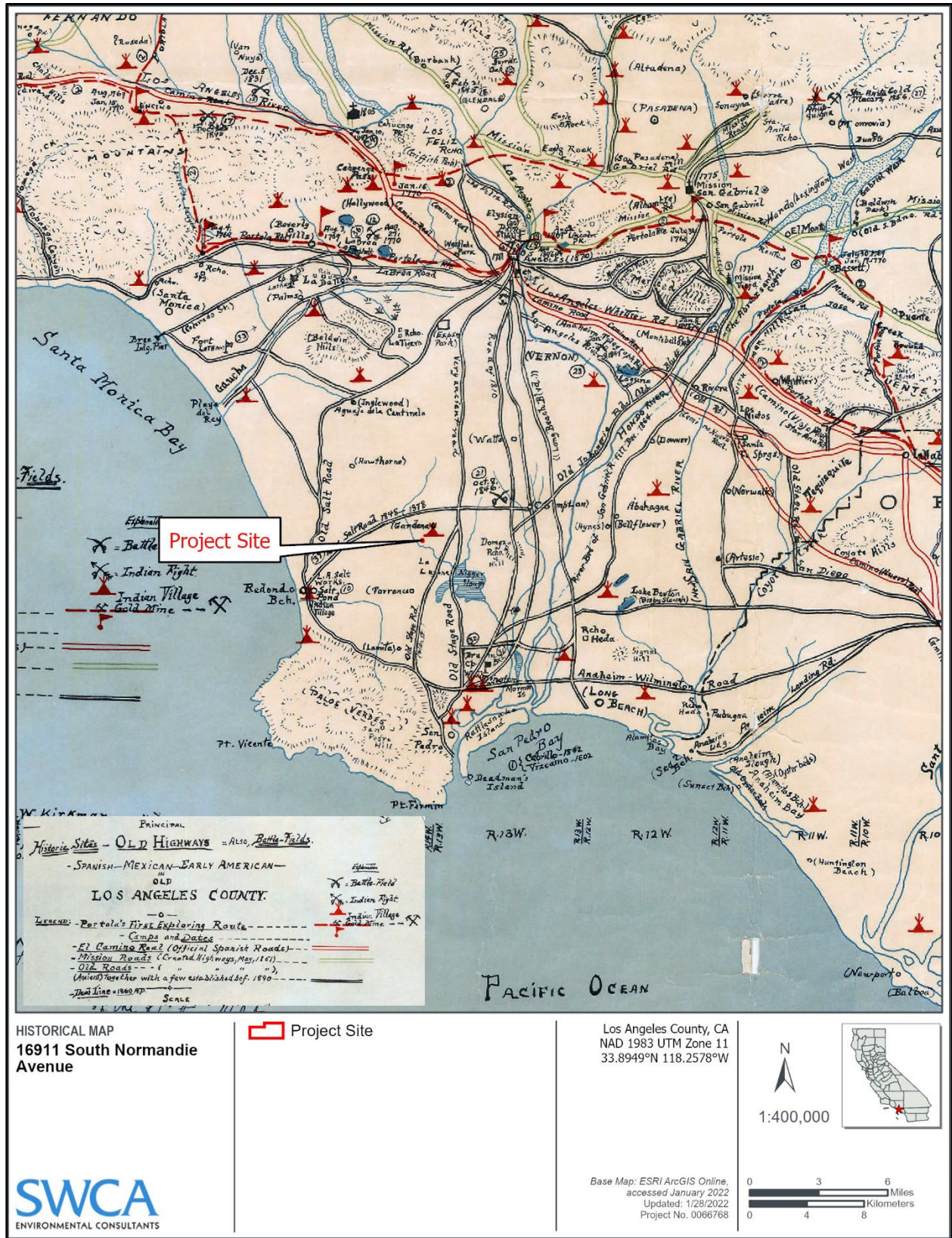


Figure A-6. Project site plotted on the Kirkman-Harriman map (Kirkman 1938).

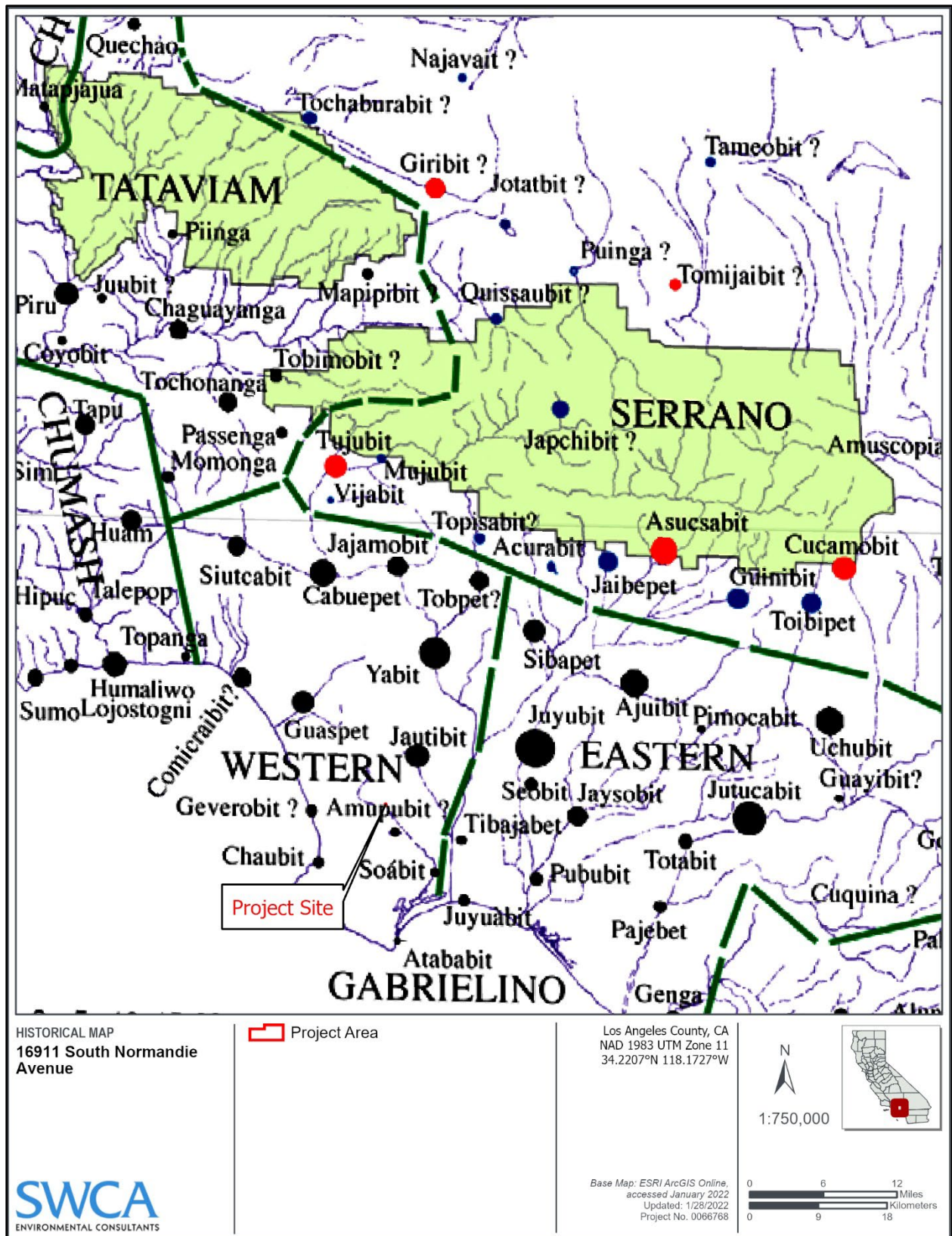


Figure A-7. Project site plotted with historical reference points associated with ethnographic sources to Gabrielino settlements in Los Angeles County (King 2004).

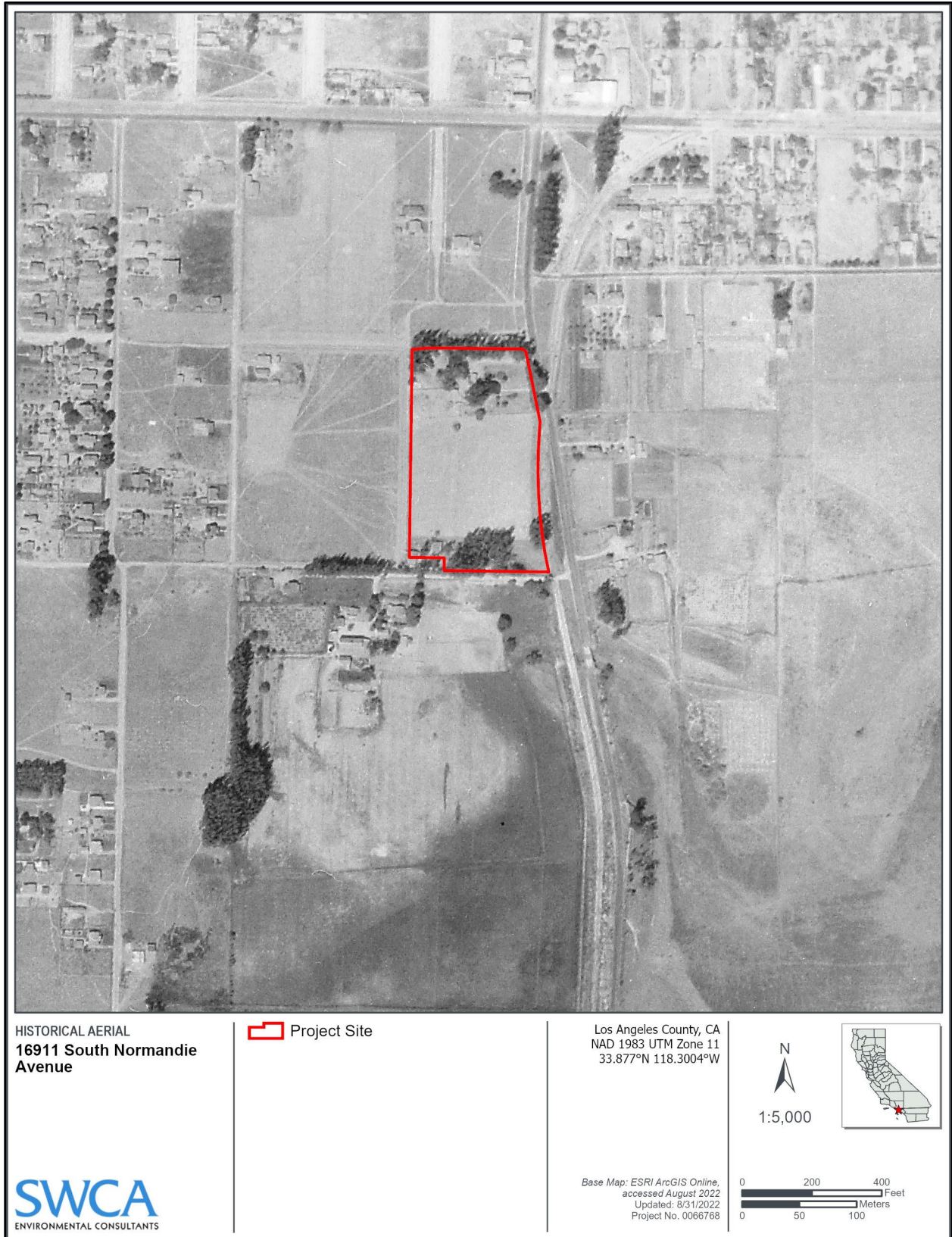




Figure A-9. A 1971 aerial view of the project site showing additional buildings/structures since 1960, and one building in southwestern portion that has since been removed.

ATTACHMENT B

**California Historical Resources Information System Search Results
(CONFIDENTIAL)**

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ATTACHMENT C

Sacred Lands File Search Results

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