

APPENDIX J:

TRIBAL CULTURAL RESOURCES

Dudek
Tribal Cultural Resources Report for The South Park Towers Project,
City of Los Angeles, Los Angeles County, California
November 2018.

TRIBAL CULTURAL RESOURCES REPORT FOR THE SOUTH PARK TOWERS PROJECT

CITY OF LOS ANGELES, LOS ANGELES
COUNTY, CALIFORNIA

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EXECUTIVE SUMMARY

Jade Enterprises retained Dudek to conduct a Tribal Cultural Resources (TCRs) study for the South Park Tower Project (project) for compliance with the California Environmental Quality Act. The project site is located in the Central City Community Plan Area of the City of Los Angeles, approximately 13 miles east of the Pacific Ocean. The 1.73-acre project site is located 1600 South Flower Street is within a heavily populated area. The project is bound on the north by Venice Boulevard, on the east by South Hope Street, on the west by South Flower Street, and on the south by the I-10 Freeway. The project falls on public land survey system (PLSS) Township 1 South, Range 13 West, within an unsectioned portion of the *Los Angeles*, CA 7.5-minute 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 (SLF), and tribal consultation initiated 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 Native American resources were identified within the project site or the surrounding area through the SCCIC records search (completed October 22, 2018) or through a search of the NAHC SLF (completed October 16, 2018). The project site has been substantially disturbed by previous construction, and is unsuited to support the presence of significant buried cultural resources or TCRs.

[The results of consultation will be updated throughout the report once consultation has concluded]. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent project notification letters by the City Department of City Planning on January 26, 2017. Representatives included Andre Salas, Gabrieleño Band of Mission Indians - Kizh Nation, Caitlin Gulley, Fernandeno Tataviam Band of Mission Indians, Robert Dorame, Gabrielino Tongva Indians of California, Sam Dunlap and Sandonne Goad, Gabrielino/Tongva Nation, Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians, Linda Candelaria, Gabrielino-Tongva Tribe, John Valenzuela, San Fernando Band of Mission Indians, Michael Mirelez, Torres Martinez Desert Cahuilla Indians, and Joseph Ontiveros, of the Soboba Band of Luiseño Indians. On February 1, 2018, Chairman Andrew Salas, of the Gabrieleño Band of Mission Indians - Kizh Nation, contacted the City requesting consultation. Consultation was initiated by the city with the Gabrieleño Band of Mission Indians - Kizh Nation on March 21, 2018, during which Chairman Salas requested information regarding equipment type and construction activities. On August 13, 2018 the City followed up via email with details related to the number/type of equipment and anticipated nature of earth-disturbing work. No further correspondence from the Gabrieleño Band of Mission Indians - Kizh Nation has been received, and the City understands consultation to be closed. No responses have been received to date from the tribal contacts.

Based on the lack of responses, 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

site. Given that no TCR has been identified that could be affected, no mitigation relating to TCRs appear to be necessary. Should future information be provided that results in the identification of a TCR that may be impacted by the project, appropriate measures must be included in the environmental document. Based on current information, impacts to TCRs would be less than significant.

1 INTRODUCTION

Jade Enterprises retained Dudek to conduct a Tribal Cultural Resources (TCRs) study for the South Park Tower Project (project) for compliance with the California Environmental Quality Act (CEQA). The present study documents the negative results of a South Central Coastal Information Center (SCCIC) records search, a search of the NAHC Sacred Lands File (SLF), and tribal consultation initiated by the lead agency (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.

1.1 Project Personnel

Adam Giacinto, MA, RPA, acted as principal archaeological and ethnographic investigator, and provided management recommendations for TCRs. Erica Nicolay, MA, acted as report author, ethnographic investigator, and completed the SCCIC records search. Linda Kry, BA, contributed to the present report. Micah Hale, PhD, RPA, reviewed recommendations for regulatory compliance.

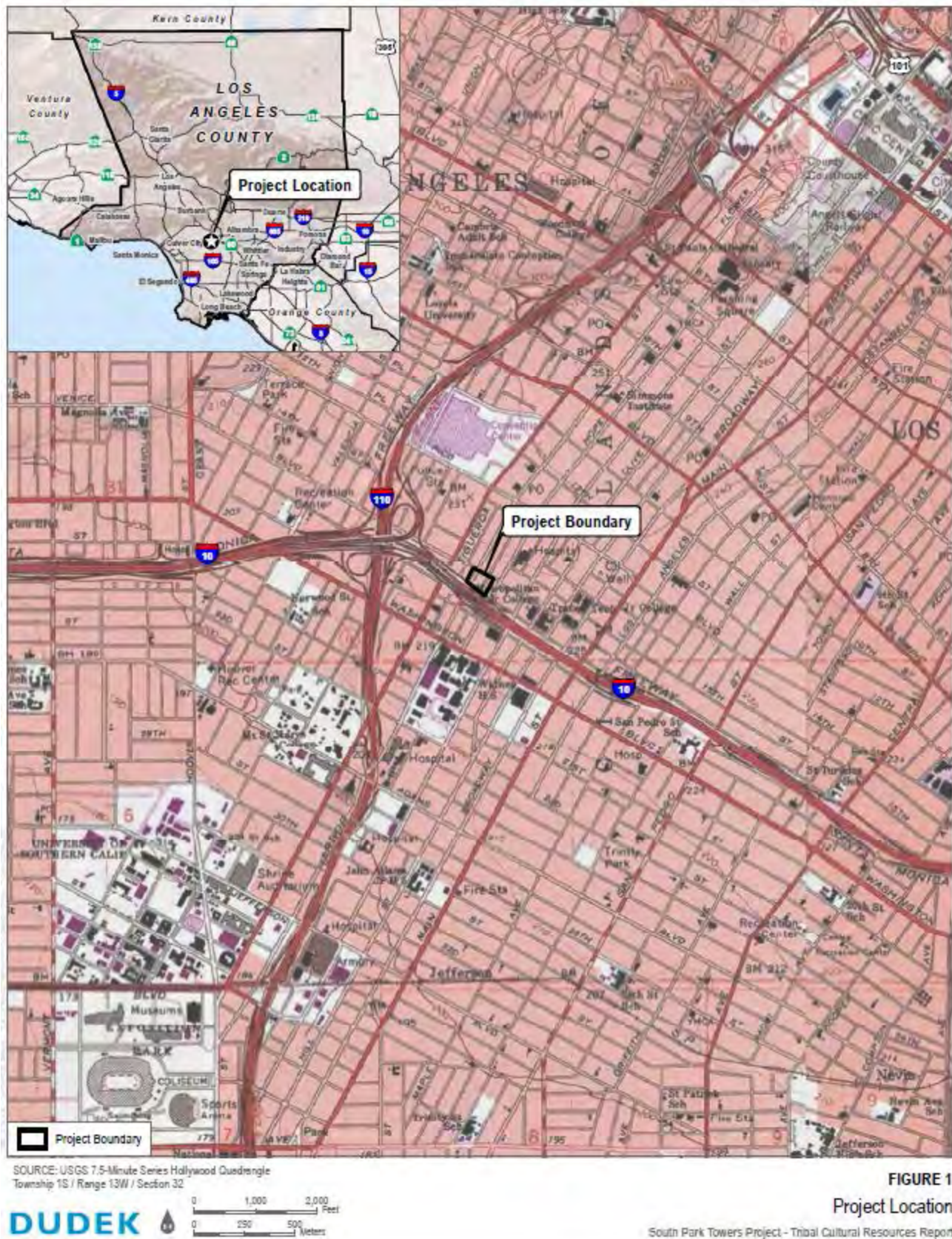
1.2 Project Location

The project site is located in the Central City Community Plan Area of the City of Los Angeles, approximately 13 miles east of the Pacific Ocean (Figure 1). The 1.7-acre project site located at 1600 South Flower Street is within a heavily populated area. The project is bound on the north by Venice Boulevard, on the east by South Hope Street, on the west by South Flower Street, and on the south by the I-10 Freeway. The project falls on public land survey system (PLSS) Township 1 South, Range 13 West, within an unsectioned portion of the *Los Angeles*, CA 7.5-minute USGS Quadrangle.

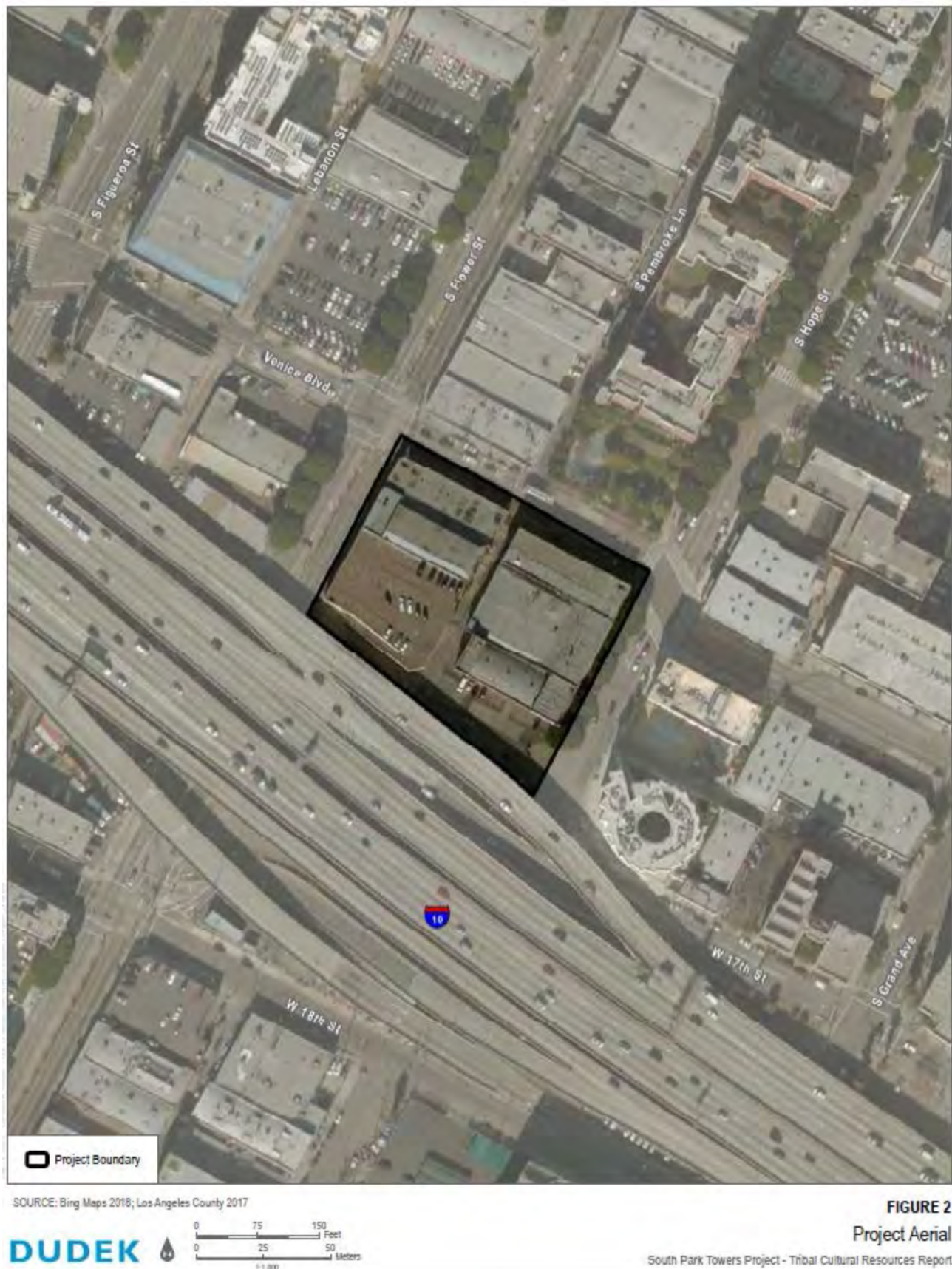
1.3 Project Description

The project proposes to replace the existing industrial buildings with two high rise towers. The new towers would include 300 hotel rooms, 250 residential units, 13,000 square feet of ground floor retail, and 288 parking spots. The towers would be 22 and 23 stories tall.

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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 (CRHR)

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 California Register of Historical Resources (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 California Code of Regulations [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; CEQA Guidelines Section 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; CEQA Guidelines Section 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; CEQA Guidelines Section 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” (CEQA Guidelines Section 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 (CEQA Guidelines Section 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 non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a TCR (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

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 TCRs 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 and that is either:

- On or determined to be 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 site, 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 TCRs 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.

This definition has been broken down into four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria – the HCM:

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

The City's 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 175,891 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.

3 ENVIRONMENTAL SETTING

3.1 Environmental Setting and Current Conditions

The project site is currently developed with a two commercial buildings which would be demolished to accommodate the project. The project site is located within a highly urbanized area, and is immediately north of Interstate-10. Surrounding uses in the vicinity of the project site include commercial uses to the north, east, and west.

The project site is situated in the valley representing Downtown Los Angeles, approximately 13 miles northeast of the Pacific Ocean. The channelized Los Angeles river is 2.4 miles to the east. Existing development is underlain by Quaternary alluvium and marine deposits, generally dating between the Pliocene and the Holocene. Soils are dominated by the Urban land, commercial, complex, associated with low-slope alluvial conditions (USDA 2018). Due the size and nature of past development associated with the surroundings structures and existing paved area native subsurface soils with potential to support the presence of cultural deposits have likely been disturbed. However, there is always some possibility that subsurface Native American resources could be present, as have been encountered elsewhere in the City. Historic-age refuse deposits generally post-dating the primary period of Native American use of this area have also been identified throughout downtown Los Angeles.

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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 (prehistoric stone tool that has been flaked on both faces), manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the region that possibly dates between 10,365 and 8,200 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: 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 (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: 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: 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–Aztecan family (Golla 2007: 74). These groups include the Gabrielino, 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–Aztecan 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

Based on evidence presented through past archaeological investigations, the Gabrielino appear to have 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 names by which Native Americans identified themselves have, for the most part, been lost and replaced by those derived by the Spanish people administering the local Missions. These names were not necessarily representative of a specific ethnic or tribal group, and traditional tribal names are unknown in the post-Contact period. The name “Gabrielino” was first established by the Spanish from the San Gabriel Mission and included people from the established Gabrielino area as well as other social groups (Bean and Smith 1978; Kroeber 1925). Many modern Native Americans commonly referred to as Gabrielino 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). This term is used here in reference to the pre-Contact inhabitants of the Los Angeles Basin and their descendants.

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

The largest, and best documented, ethnographic Tongva village in the vicinity was that of Yanga (also known as *Yaangna*, *Janga*, and *Yabit*), which was in the vicinity of the downtown 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 the recruitments to this mission; however, following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid work 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 Gabrielino inhabitants of Yanga were recruited to 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 Gabrielino territory. Second in size, and less thoroughly documented, the village of Cahuenga was located just north of the Cahuenga Pass.

Father Juan Crespi passed through the area near Yanga 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 environment surrounding the Tongva included mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like most native Californians, acorns (the processing of which was established by the early Intermediate Period) were the staple food source. 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).

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Tools and implements used by the Tongva to gather and collect food resources included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Trade between the mainland and the Channel Islands Groups was conducted using plank canoes as well as tule balsa canoes. These canoes were also used for general fishing and travel (McCawley 1996). The collected food resources were processed food with hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

The Chinigchinich cult, centered on the last of a series of heroic mythological figures, was the basis of religious life at the time of Spanish contact. The Chinigchinich cult not only provided laws and institutions, but it also taught people how to dance, which was the primary religious act for this society. 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. This cult may be the result of a mixture of native and Christian belief systems and practices (McCawley 1996).

Inhumation of deceased Tongva was the more common method of burial on the Channel Islands while neighboring mainland coast people performed cremation (Harrington 1942; McCawley 1996). Cremation ashes have been found 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). Supporting this finding in the archaeological record, ethnographic descriptions have provided an elaborate mourning ceremony. 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

Post-Contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1848), and American Period (1846–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 2001).

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 Angels 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.

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.

4.3.2 Mexican Period (1821–1846)

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).

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

Dudek conducted a California Historical Resources Information System (CHRIS) records search at the SCCIC on October 22, 2018 for the proposed project site and surrounding 0.5 mile search buffer. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) 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.

5.1.1 Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 39 previous cultural resource studies have been conducted within the records search area between 1979 and 2017 (Table 1). Of these studies, LA-13239 intersects the project area.

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

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-00483	Greenwood, Roberta S.	1978	Archaeological Resources Survey the Proposed Downtown People Mover Project Corridor Area	Outside
LA-03425	Kane, Diane and Pat Williamson	1994	Northern Terminus to the I-110 Harbor Freeway Transitway Finding of Effect Re-evaluation	Outside
LA-04097	Anonymous	1995	Council District Nine Revitalization/recovery Program Final Environmental Impact Report	Outside
LA-04576	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 574-01, County of Los Angeles, California	Outside
LA-04577	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 575-01, County of Los Angeles, California	Outside
LA-04836		2000	Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project	Outside
LA-05080	Lapin, Philippe	2000	Cultural Resource Assessment for Modifications to Pacific Bell Wireless Facility La 574-01, County of Los Angeles, Ca	Outside
LA-05099	Duke, Curt	2000	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 578-12, in the County of Los Angeles, Ca	Outside
LA-05327	Duke, Curt	2000	Cultural Resource Assessment for Pacific Bell Wireless Services Facility La 484-02, County of Los Angeles, California	Outside
LA-05444	Iverson, Gary	2000	Negative Archaeological Survey Report:07-la-110-20.0/22.1-07-173-1y2901	Outside

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

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-06410	Christy, Juliet L.	2001	Archaeological Survey South Central Los Angeles High School No. 3 Los Angeles, California	Outside
LA-06453	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm 139-02 Los Angeles County, California	Outside
LA-06505	Smith, Philomene C.	2000	Highway Project of Replacing the Existing Overhead Reflective Sign Panels In-kind With Retro-reflective Panels	Outside
LA-07430	Feldman, J., Hope, A.	2004	Caltrans Historic Bridges Inventory Update: Concrete Box Girder Bridges	Outside
LA-08013	McKenna, Jeanette A.	2006	Cultural Resources Investigations for the Proposed City House Los Angeles (Ilc), and the Olympic on Grand (Ilc) Properties in the City of Los Angeles, Los Angeles County, California	Outside
LA-08263	Wood, Catherine M.	2007	Archaeological Survey Report for the New Carver Apartments Project Located at 325 W. 17th Street, Los Angeles, California	Outside
LA-08753	Bonner, Wayne H.	2006	Cultural Resources Records Search Results and Site Visit for T-mobile Candidate La03101d (1240 Main Street), 1240 South Main Street, Los Angeles, Los Angeles County, California	Outside
LA-08755	Bonner, Wayne H. and Kathleen A. Crawford	2007	Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate Ca7721i (scarff), 2222 South Figueroa Street, Los Angeles, Los Angeles County, California	Outside
LA-08758	Bonner, Wayne H.	2007	Cultural Resources Records Search and Site Visit Results for T-mobile Candidate Sv11006g (circular Holding), 1801 South Flower Street, Los Angeles, Los Angeles County, California	Outside
LA-08760	Bonner, Wayne H.	2006	Cultural Resources Records Search and Site Visit Results for T-mobile Candidate Sv11002h (cameron), 1349 South Flower Street, Los Angeles, Los Angeles County, California	Outside
LA-09154	Leaver, Ryan C.	2007	Direct APE Historic Achitectural Assement for T-mobile Candidate SV11002F (Pico/Flower), 1315 South Flower Street, Los Angeles, Los angeles County, California	Outside
LA-09539	Bonner, Wayne H.	2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11003K (Telacu Plaza), 1033 South Hope Street, Los Angeles, Los Angeles County, California	Outside
LA-09544	Bonner, Wayne, Sarah Williams, and Kathleen A. Crawford	2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11002I (Edwards Building), 1200 South Hope Street (also known as 430 12th Street), Los Angeles, Los Angeles County, California	Outside
LA-09800	Janet Ostashay and Peter Moruzzi	2004	PTA Building, 322 West 21st Street, Los Angeles, California, Recordation Document	Outside
LA-09808	Janet Ostashay	2004	LATTC Campus, Building A, Building C	Outside
LA-10127	Chattel, Robert	1996	California Lutheran Hospital (california Hospital Medical Center) Los Angeles, California Historic and Contemporary Photographs	Outside

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

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-10262	Bonner, Wayne, Arabesque Said, and Kathleen Crawford	2010	Cultural Resource Records Search and Site Visit Results for Clearwire Candidate CA-LOS5988A / CA5629 (Basement Clothing), 1200 S. Hope St., Los Angeles, Los Angeles County, California.	Outside
LA-10672	Bonner, Wayne and Kathleen Crawford	2010	Cultural Resources Records Search, Site Visit Results, and Direct APE Historic Architectural Assessment for Clearwire Candidate LA-LOS2023A (Mod-O-Day Building-41008), 155 West Washington Boulevard, Los Angeles, California	Outside
LA-10772	Hatheway, Roger	1979	Historic Building Survey, Los Angeles Downtown People Mover Program Report for Determination of Eligibility	Outside
LA-10860	Robinson, Mark	2007	Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan	Outside
LA-10982	Hatoff, Brian	2010	Verizon Cellular Communications Tower Site - ABM Industries IBR, 1150 South Olive Street, Los Angeles, CA 90015	Outside
LA-11495	Loftus, Shannon	2011	Cultural Resource Records Search and Site Survey, AT&T Site LA0465A, White Building Billboard, 1625 South Broadway Los Angeles, Los Angeles County, California 90015. CASPR#3551017349	Outside
LA-11768	Loftus, Shannon	2012	Historic Architectural Resource-Inventory and Assessment AT&T Site LAC616 LTE, South Figueroa/Pico, 1441 Wright Street Los Angeles, Los Angeles County, CA	Outside
LA-12174	Bonner, Wayne and Crawford, Kathleen	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV110021 (11002 Edward Building) 1200 South Hope Street, Los Angeles, Los Angeles County, California	Outside
LA-12177	Bonner, Wayne and Crawford, Kathleen	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11003K (Telacu Square) 1033 South Hope Street, Los Angeles, Los Angeles County, California	Outside
LA-12179	Bonner, Wayne and Crawford, Kathleen	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02139A (SM139 1601 Los Angeles St) 1601 Los Angeles Street, Los Angeles, Los Angeles County, California	Outside
LA-12394	Bonner, Wayne and Crawford, Kathleen	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11006G (Circular Holding), 1801 South Flower Street, Los Angeles, Los Angeles County, California	Outside
LA-12584	Rogers, Leslie	2013	Restoration of Historic Streetcar Service in Downtown Los Angeles	Outside
LA-13239	Gust, Sherri	2017	Extent of Zanja Madre	Intersecting

LA-13239

This review of SCCIC records search and archival information, completed by Cogstone Resource Management, Inc. 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 (Gust 2012). Cogstone mapped the likely route of a segment of the zanja network [identified as Zanja No. 8 in Gumprecht (2001)] as running northeast/southwest through the center of the project site. While the Cogstone study provides a valuable review of available documentation pertaining to this historic water conveyance feature, the level of existing information does not provide substantial or otherwise confirmed evidence indicating that this feature is present within the project area.

5.1.2 Previously Conducted Cultural Resource Studies

A total of 16 previously recorded cultural resources have been documented within a half-mile of the Project. None of these intersect the project site. All of the nine resource identified during the records search are historic-era buildings. No cultural resources of Native American origin are documented within the Project site or surrounding half-mile search area of files held at the SCCIC.

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 October 10, 2018. The NAHC emailed a response on October 16, 2018, which indicated that the SLF search was completed with negative results. 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 project. The NAHC provided the contact information of the ten 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

[Section to be updated following results of 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 that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed project. All NAHC-listed California Native American Tribal representatives that have requested project notification pursuant to AB 52 were sent letters by the City Department of City Planning on January 26, 2018. The letters contained a project description, outline of AB 52 timing, request for consultation, and contact information for the appropriate lead agency representative.

On February 1, 2018 Andrew Salas, of the Gabrieleño Band of Mission Indians - Kizh Nation, contacted the city requesting consultation. Consultation was initiated by the city with the Gabrieleño Band of Mission Indians - Kizh Nation on March 21, 2018. During consultation the Gabrieleño Band of Mission Indians - Kizh Nation requested information regarding equipment type and construction activities. On August 13, 2018 the City followed up via email with details related to the number/type of equipment and anticipated nature of earth-disturbing work. The City included a request for a response by August 27, 2018, to which no response has been received to date. As there has been no further correspondence from the Gabrieleño Band of Mission Indians - Kizh Nation the City understands consultation to be closed.

To date, no responses have been received from other tribal contacts regarding TCRs or other concerns about the project. Based on the lack of responses, 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 site.

5.3 Historic Aerial Review

Dudek consulted historic maps and aerial photographs to understand development of the project site and surrounding properties. Topographic maps are available from 1894 to the present and aerial images are available from 1952 to the present (NETR 2018a, 2018b).

Topographic maps indicate that the project site and vicinity had already begun to be developed by the late nineteenth century. Over the first three decades of the twentieth century the project area and vicinity experienced an increase in development, though maps are generally unhelpful in understanding minute changes within the project site and surrounding blocks. Historic aerials from 1948 show that the project area and immediate vicinity was completely developed by this time. The area is characterized mainly by medium sized developments, possibly apartment complexes, with associated parking lots in some cases. No significant changes are visible in the area until 1964. The 1964 aerial shows that by this time the I-10 freeway had been constructed; as a result, the block containing the project site was redeveloped. The buildings that occupied the project site in the late 1940s and early 1950s were replaced with the two commercial buildings which now occupy the complex by 1964. There does not appear to be any changes to the project site throughout the second half of the twentieth century.

5.4 Ethnographic Research and Review of Academic Literature

Dudek cultural resources specialists reviewed pertinent academic and ethnographic literature for information pertaining to past Native American use of the project site. This review included consideration of sources commonly identified through consultation, notably the 1938 Kirkman-Harriman Historical Map often referenced by the Gabrieleño Band of Mission Indians-Kizh Nation (Kirkman-Harriman 1937; Figure 3). Based on this map, the project site is between a trail labeled “Old Salt Road” to the south, and an unlabeled trail to the north. On this map the project site is not shown to be near any mapped Native American villages, however, it is located southwest of the original site of the City of Los Angeles. Though not called out on this map, this would have been the location of the nearest known village. Known as *Yaanga* (also known as *Yabi*), the village was located approximately 2.25 miles northeast of the project site, near the location of present day Union Station (McCawley 1996: 57; Morris et al 2016). It should be noted that the Kirkman-Harriman 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 map was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833). Although the map contains no specific primary references, it matches with the details documented by the Portola expedition (circa 1769-1770). 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 review of archaeological or other primary documentation on a case-by-case basis. No information relating to the village of *Yaanga* was provided within the technical reports reviewed as part of the records search for this study (Brown 2002: 663).

At the time of Portola's expedition, and through the subsequent mission period, the area surrounding the project site would have been occupied by Western Gabrieleno/Tongva inhabitants (Figure 4 and Figure 5). Use of Gabrieleno as a language has not been documented since the 1930s (Golla 2011). One study made an effort to map the traditional Gabrieleno/Tongva cultural use area through documented family kinships included in mission records (NEA and King 2004). This process allowed for the identification of clusters of tribal villages (settlements) with greater relative frequencies of related or married individuals than surrounding areas (Figure 6). Traditional cultural use area boundaries, as informed by other ethnographic and archaeological evidence, were then drawn around these clusters. The relative sizes of these villages were also inferred from their relative number of mission-period recruits. As previously stated the nearest village site to the project site was *Yaanga* located in roughly the same location as present day Union Station, approximately 2.25 miles northeast of the project site. *Yaanga*, though not depicted on the Kirkman-Harriman map, is referenced in several archaeological and ethnographic works including Dakin 1978, Johnston 1962, McCawley 1996, and Morris et al. 2016. *Yaanga* is described as being the "Indian precursor of modern Los Angeles" as the city was originally established within its boundaries (McCawley 1996: 57). Mission records indicate that 179 Gabrieleno inhabitants of *Yaanga* were recruited to the San Gabriel Mission, indicating that it may have been the most populated village in the Western Gabrieleno territory (NEA and King 2004: 104). In general, the mapped position of *Yaanga* 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 *Yaanga* may have been located anywhere between the current Dodger's Stadium and the Bella Union Hotel (constructed circa 1870), 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 *Yaanga* have been encountered throughout this area but have 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 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, prior to the settlement of the area in the eighteenth century.

Ethnographic research indicates that after the founding of Los Angeles the Native American settlement of *Yaanga* 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 0.6 miles northwest of the project site (Morris et al 201: 94). This second village site was only occupied until about 1836, after which Native American communities in Los Angeles were relocated east of the Los Angeles River. After 1836, Native Americans were forcibly relocated another three times, in 1845, 1846, and 1847 (Morris et al. 2016: 94). No archaeological evidence for Native American communities was

found in the SCCIC records search results or review of other archaeological information, however most of these areas fell outside of the archaeological records search area.

Based on review of pertinent academic and ethnographic information, the project falls within the boundaries of the Gabrieleño/Tongva traditional territory. The project is located relatively close to the original location of *Yaanga* as well as the reported location of *Rancharia de los Poblanos*, an early-nineteenth century Native American settlement. However, no Native American TCRs have been previously documented in areas that may be impacted by the project.



SOURCE: Kirkman - Hariman 1937 Pictorial and Historical Map of Los Angeles County: 1860-1937 AD

FIGURE 3

1938 Kirkman-Hariman Map

South Park Towers Project - Tribal Cultural Resources Report

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SOURCE: NEA and King 2004 Ethnographic Overview of the Angeles National Park - Figure 2

FIGURE 6

Mission-Era Native American Recruitment Map

South Park Towers Project - Tribal Cultural Resources Report



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6 FINDINGS AND RECOMMENDATIONS

6.1 Summary of Impacts to Tribal Cultural Resources

[Section to be updated pending consultation]. A project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment (PRC Section 21084.2). AB 52 requires a TCR to have tangible, geographically defined properties that can be impacted by an undertaking. No Native American resources have been identified within the project site or the surrounding search radius through the records search at the SCCIC (completed October 22, 2018) or through a search of the NAHC SLF (completed October 16, 2018). Additionally, 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 site. 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 TCRs. Should TCRs 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 TCR (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 TCRs. 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 TCR 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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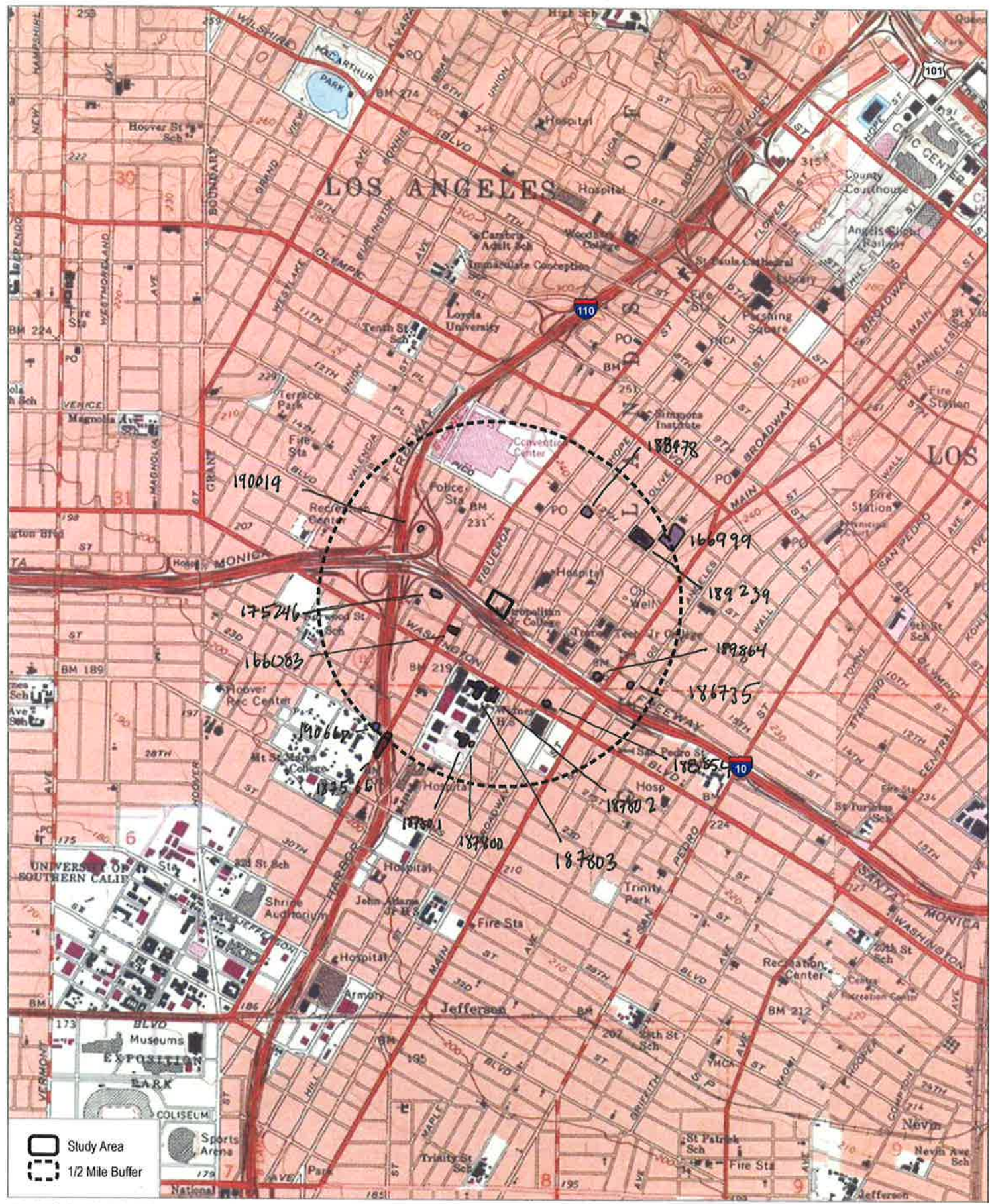
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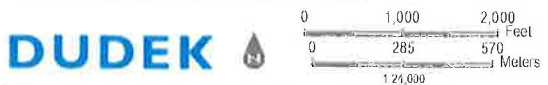
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APPENDIX A (CONFIDENTIAL)

SCCIC Records Search Results



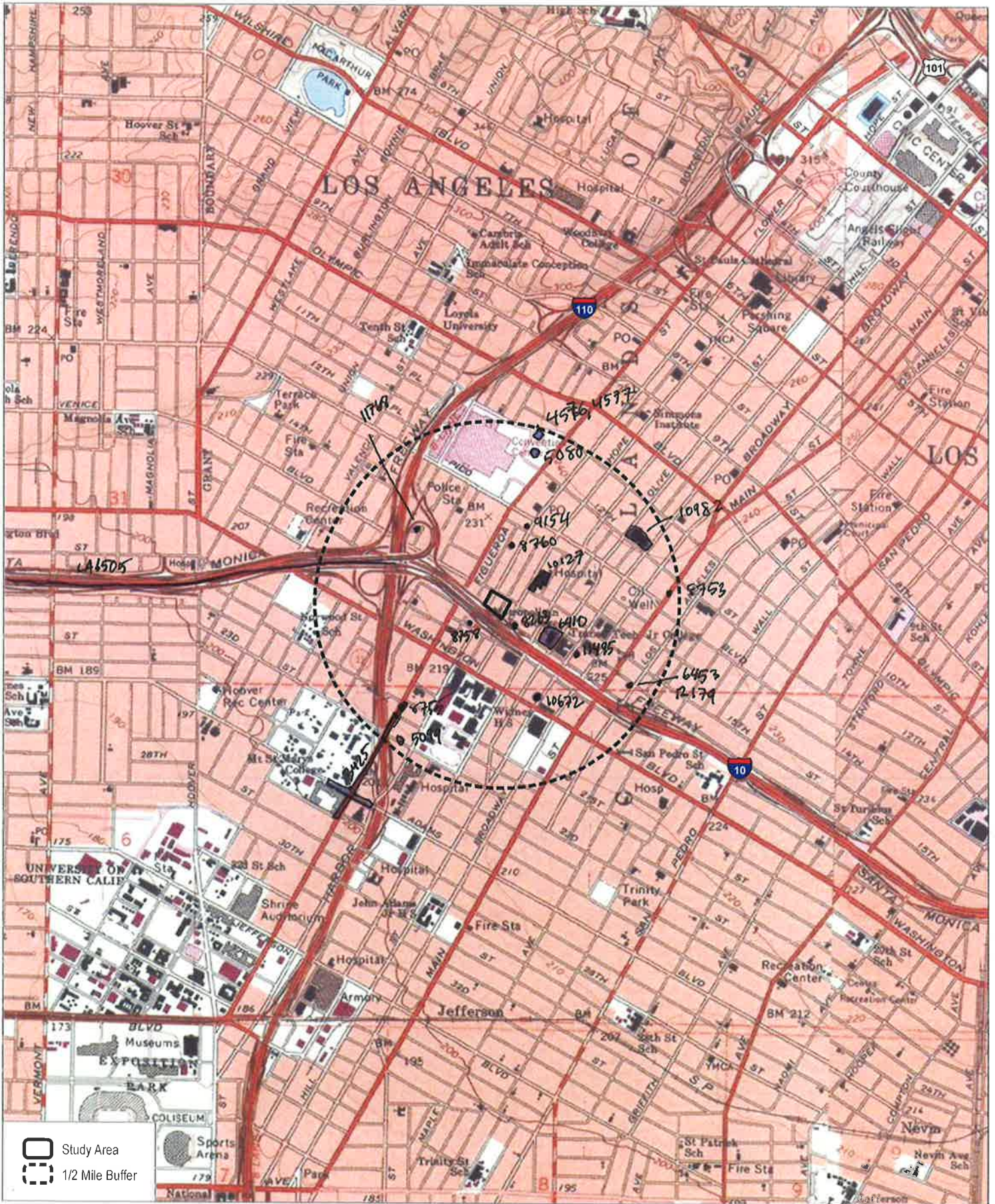
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Township 1S, 2S; Range 13W; Sections 5, 6, 31, 32



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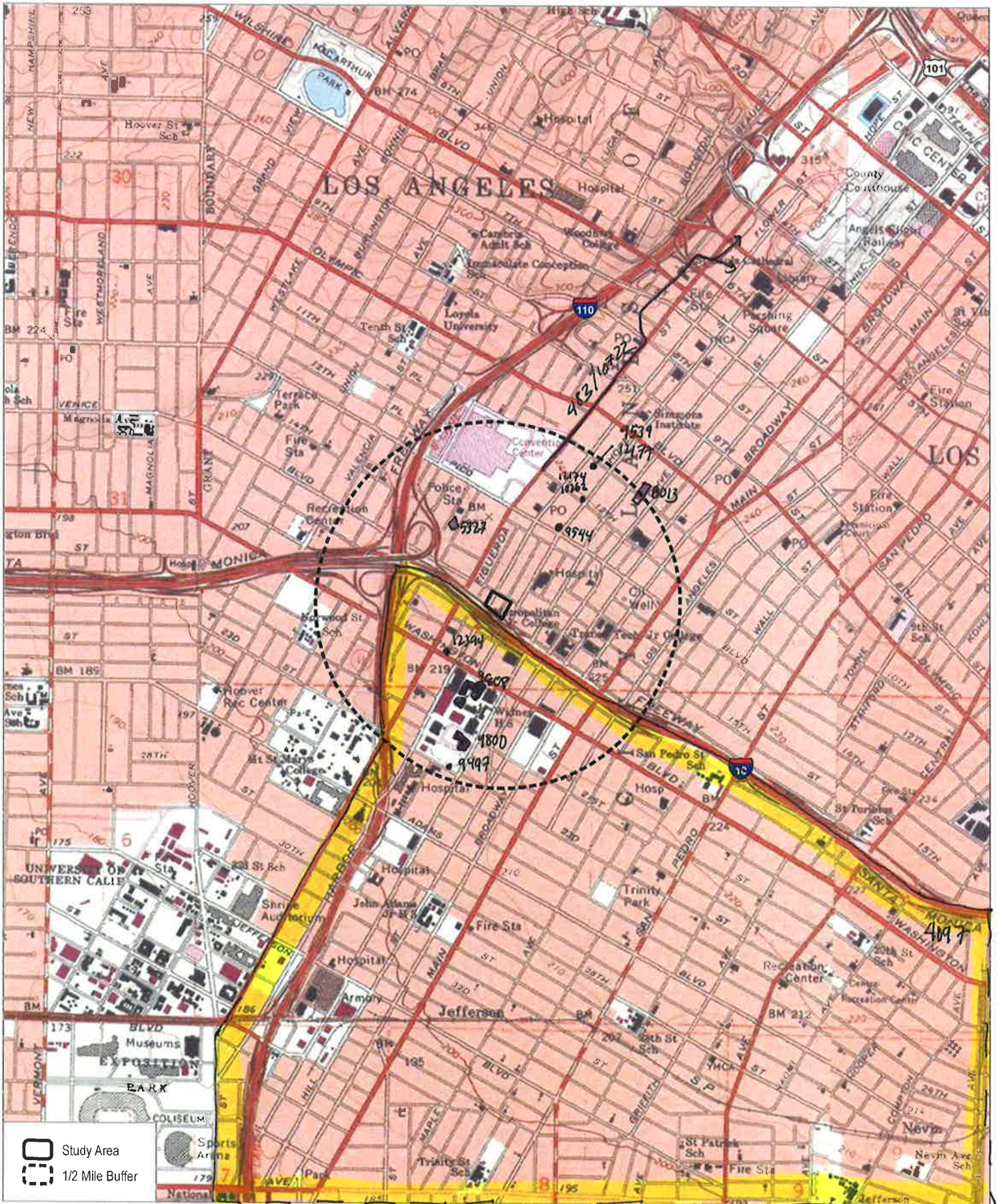
Records Search
South Park Towers Project

15



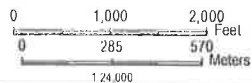
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Records Search
South Park Towers Project



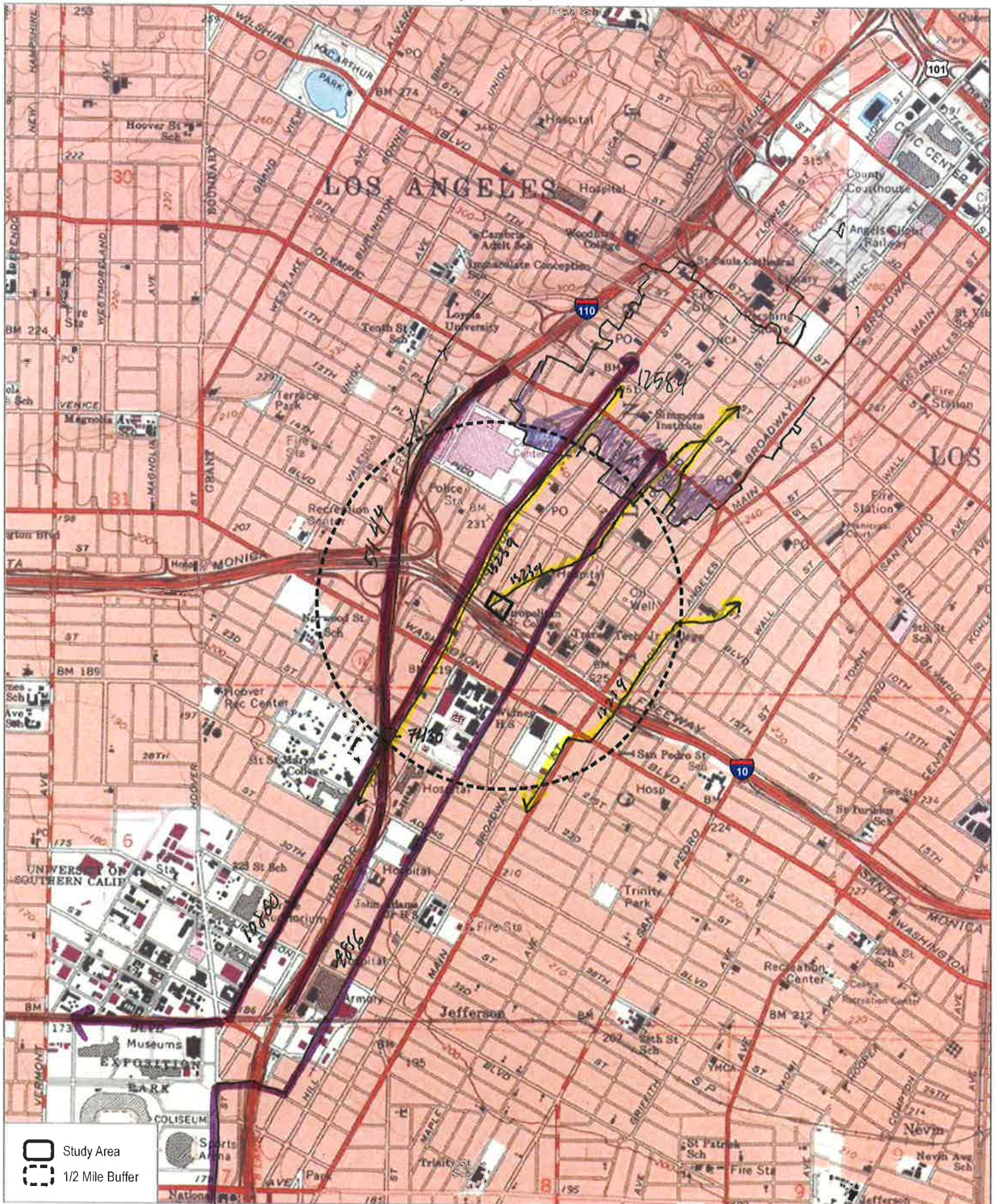
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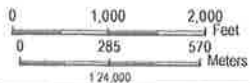
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12394, 5327, 4097, 9808, 9800, 12174, 10262

Records Search
South Park Towers Project



SOURCE: USGS 7.5-Minute Series Hollywood Quadrangle
Township 1S, 2S; Range 13W, Sections 5, 6, 31, 32

DUDEK



12584, 4836, 10860, 5444, 7430, 11239

Records Search
South Park Towers Project

APPENDIX B

NAHC Sacred Lands File Search and Record of AB
52 Consultation

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



October 16, 2018

Erica Nicolay
Dudek

VIA Email to: enicolay@dudek.com

RE: South Park Towers (11456) Project, Los Angeles County

Dear Ms. Nicolay:

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

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

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Katy Sanchez".

for Katy Sanchez
Associate Environmental Planner

**Native American Heritage Commission
Native American Contacts List
10/16/2018**

Gabrieleno Band of Mission Indians - Kizh Nation Andrew Salas, Chairperson P.O. Box 393 Covina, CA 91723 admin@gabrielenoindians.org (626) 926-4131	Gabrielino	Gabrielino-Tongva Tribe Charles Alvarez, Councilmember 23454 Vanowen St. West Hills, CA 91307 roadkingcharles@aol.com (310) 403-6048	Gabrielino
 Gabrieleno/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson P.O. Box 693 San Gabriel, CA 91778 GTTribalcouncil@aol.com (626) 483-3564 Cell (626) 286-1262 Fax	 Gabrielino Tongva		
 Gabrielino /Tongva Nation Sandonne Goad, Chairperson 106 1/2 Judge John Aiso St., #231 Los Angeles, CA 90012 sgoad@gabrielino-tongva.com (951) 807-0479	 Gabrielino Tongva		
 Gabrielino Tongva Indians of California Tribal Council Robert F. Dorame, Chairman P.O. Box 490 Bellflower, CA 90707 gtongva@gmail.com (562) 761-6417 Voice/Fax	 Gabrielino Tongva		
 Gabrielino-Tongva Tribe Linda Candelaria, Chairperson 80839 Camino Santa Juliana Indio, CA 92203 lcandelaria1@gabrielinotribe.org	 Gabrielino		

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes for the proposed:
South Park Towers (11456) Project, Los Angeles County.