Appendix IS-13

Tribal Cultural Resources Assessment

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TECHNICAL MEMORANDUM

To: Bryan Haworth
SCD 1811 Sacramento LLC
c/o Skanska USA Commercial Development Inc.
633 W. 5th Street, Floor 68
Los Angeles, CA 90071

From: David K. Sayre, Project Manager

Date: March 21, 2023

Re: **Tribal Cultural Resources Assessment for the 1811 Sacramento Street Commercial Development Project, City of Los Angeles, California**

SCD 1811 Sacramento LLC (Project applicant) retained SWCA Environmental Consultants (SWCA) to prepare a tribal cultural resource assessment for the proposed 1811 Sacramento Street Commercial Development Project (Project), located at 1727–1829 East Sacramento Street (Project site) in Los Angeles, California. Under the proposed Project, a new commercial development would be constructed that consists of a 15-story building with office space, restaurant space, and retail space. The Project will also include uncovered outdoor areas throughout the Project site such as exterior office space, outdoor dining space, a rooftop deck, and an outdoor amenity deck. The Project would remove the existing developments within the Project site, which includes three buildings and hardscaping elements. The Project site consists of an irregularly shaped group of parcels in the southern portion of the city block between Sacramento Street to the south, Bay Street to the north, Lawrence Street to the west, and Wilson Street to the east (Figure A-1 and Figure A-2).[1] The Project site measures a total of approximately 1.75 acres and comprises two parcels: Assessor's Parcel Numbers (APNs) 5166-030-008 and 5166-030-009. The Project is in Section 3, Township 2 South, Range 13 West, and is plotted on the U.S. Geological Survey (USGS) Los Angeles, California, quadrangle (Figure A-3).

The Project is subject to environmental review in compliance with the California Environmental Quality Act (CEQA). The City of Los Angeles (City) Department of Planning (City Planning) is the lead CEQA agency. This technical 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 unidentified tribal cultural resources that could be present in the Project site, particularly those that would be archaeological in nature and preserved as buried deposits. The results of this study are intended to provide a basis on which the potential for impacts to tribal cultural resources can be determined in accordance with the significance thresholds in Appendix G of the CEQA Guidelines. Tribal consultation pursuant to Public Resources Code (PRC) Section 21080.3.1 is still on-going. As such, the results and recommendations presented in this memorandum are based on available information and has not considered any information submitted by tribal parties. Although not all tribal cultural resources are archaeological in nature, those preserved below the surface within the Project Site would likely fit the definition of both an archaeological and a tribal cultural resource. The information presented herein focuses exclusively on archaeological and anthropological sources of evidence viewed from a scientific and scholarly perspective

[1] All figures are included in Attachment A.

that adheres to standard industry practices and applicable regulations. SWCA's scientific perspective does not necessarily represent tribal values and our findings are not intended as a substitute for tribal expertise.

This study includes a summary of resources identified in the California Historical Resources Information System (CHRIS) through the South Central Coastal Information Center (SCCIC), the results of a sacred lands file (SLF) search through the Native American Heritage Commission (NAHC), and background research used to assess the potential for a buried resource that has not been previously identified. The CHRIS and SLF results letters are included in Attachments B and C, respectively. This report was prepared by SWCA Project Manager David K. Sayre, B.A. Principal Investigator Chris Millington, M.A., Registered Professional Archaeologist, reviewed this report for quality assurance/quality control. Mr. Millington meets the Secretary of the Interior Professional Qualification Standards in archaeology and the Society for California Archaeology's standards for a principal investigator. Copies of this report will be retained by the Project applicant, City Planning, and the SCCIC at California State University, Fullerton. All background materials are on file with SWCA's office in Pasadena, California.

REGULATORY SETTING

State Regulations

Assembly Bill 52

Assembly Bill 52 (AB 52) 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; these sections address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as being 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 will 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]).

AB 52 TRIBAL CONSULTATION

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the NAHC, 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 21080.3.1[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 21080.3.1[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 21080.3.1[b][e]).

Consistent with the stipulations stated in 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 21080.3.2[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 5024.1 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.

ENVIRONMENTAL SETTING

The Project site is in the Los Angeles Basin, a broad, level plain defined by the Pacific Ocean to the west, the Santa Monica Mountains and Puente Hills to the north, and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments (California Geological Survey 2010; Dibblee 1991). It is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The Project site is located approximately 5.5 km (3.4 miles) south of the confluence of the Los Angeles River and the Arroyo Seco. Largely due to the reliable flow of water from these sources, the location has been ideal for human habitation, both before and after the arrival of European settlers. The Project site is located at an elevation of approximately 73.2 m (240 feet) above mean sea level.

Historically, the Los Angeles River shifted course with frequency across the basin, flooding the project area through the nineteenth century. The now-channelized course of the Los Angeles River is located approximately 0.6 km (0.4 mile) east of the Project site, though historically the channel has shifted courses several times during flood events. The first recorded shift of the river occurred in 1815 (Figure A-4) when floodwaters overflowed the former channel, shifting the course at least 0.8 km (0.5 mile) to the southwest, near the present route of Spring Street. That flood is reported to have destroyed structures built as part of the original Los Angeles Pueblo (Gumprecht 2001:139–141) and may have also flooded all or parts of the Gabrielino settlement of Yaanga, which is believed to have been located nearby (discussed below).

Some of the shifts in the river's course were more dramatic. Before 1825, the river flowed west from what is now downtown Los Angeles and discharged into the Ballona Wetlands in what is now Playa del Rey. The river followed a western course approximated by Washington Boulevard and then turned southwest at the Baldwin Hills, flowing along the northwest-facing side of the slopes—the course now occupied by Ballona Creek (Gumprecht 2001:17). Heavy rains in 1825 caused the channel to overflow its banks and the Los Angeles River shifted its course fully south (see Figure A-4), emptying into the bay near San Pedro, where the river has discharged ever since. In subsequent years, the river has frequently shifted its course within the southern floodplain, which in some areas measures up to 2 miles wide (Gumprecht 2001:16). However, these more dramatic shifts between the western and southern routes are likely to have occurred during most of the life of the watercourse, and certainly over during the last 13,000 years—the period in which there is evidence of Native Americans in southern California. Flood events such as those recorded in more recent history have produced massive deposits of alluvial sediments within the respective floodplains. Alluvial terraces formed where flooding water eroded into uplifted landforms. In the downtown Los Angeles area, the backslopes in the location of Bunker Hill delineate the edge of the historical floodplain.

Geologic mapping by Campbell et al. (2014) indicates the surface sediments at the Project site are classified as late Pleistocene to possibly early Holocene young alluvial deposits (Qya2). Qya2 generally consists of unconsolidated clay, silt, and sand on floodplains, and is clearly related to ongoing

depositional processes. Previous drilling activities for soil borings and vapor probe installations for the Phase II Environmental Site Assessment described sediments within the Project site as generally consisting primarily of sand and gravelly sand, with occasional layers of silty sand and clayey silt/clay extending to a depth of at least 50 feet (White and Blackmer 2020).

Geotechnologies, Inc. (Geotechnologies) conducted a preliminary geotechnical investigation of the Project site in December 2021 (Varela 2022). As part of this study, Geotechnologies excavated three 8-inch-diameter hollow stem auger borings to depths between 30 and 55 feet below ground surface (bgs). Of the two bores with depths of 30 feet bgs, one bore is located near the eastern edge of the Project site and one bore is located in the southwest portion of the Project site. The third bore was excavated to a depth of 55 feet bgs and was located near the northern edge of the Project site. This report documents that there is approximately 3 to 7 feet of artificial fill beneath the ground surface. The artificial fill consisted primarily of silty sand, which is yellowish brown to dark brown in color, moist, medium dense and fine grained. The upper alluvial flood deposits that underlie the fill deposits within the Project site extend up to 15 feet bgs based on the data reviewed as part of the geotechnical assessment. The upper alluvial sediments were described as being composed of sand, silty sand and sandy silt, which are yellowish brown to grayish brown in color, moist, medium dense, or stiff and fine to medium grained. Below a depth of 15 feet bgs, the lower and older alluvial soils consist mainly of sands, which are yellowish brown to dark brown in color, moist, dense to very dense, and fine to coarse grained, with interlayered gravel and cobbles (Varela 2022). Within the northernmost boring, located near the northern edge of the Project site, “minor” brick fragments were observed within the artificial fill in the first 7 feet bgs (Varela 2022).

CULTURAL SETTING

Native American Archaeological Record

Numerous chronological sequences have been devised to aid in understanding cultural changes within southern California. California prehistory is generally divided into three broad temporal periods (i.e., Paleoindian, Archaic, and Emergent periods; see Fredrickson 1973, 1974, 1994) that reflect similar cultural characteristics throughout the state and were generally governed by climatic and environmental variables, such as the drying of pluvial lakes at the transition from the Paleoindian to the Lower Archaic. Numerous chronological sequences were also devised to aid in understanding cultural changes on a smaller scale, within the subregion of southern California specifically. Building on early studies and focusing on data synthesis and artifact types, Wallace (1955, 1978) developed a prehistoric chronology for southern California composed of four sequential horizons: Early Man (Horizon I); Milling Stone (Horizon II); Intermediate (Horizon III); and Late Prehistoric (Horizon IV). The regional prehistoric cultural chronology is summarized in Table 1 (adapted from Wallace 1955, 1978). This original synthesis lacked chronological precision initially; however, the advent of radiocarbon dating in the 1950s allowed researchers to further refine and revise these periods as radiocarbon datasets grew and additional analyses were conducted resulting in more refined chronologies and sequences (e.g., Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2002; Mason and Peterson 1994; see also Moratto 1984). Additional primary syntheses for southern California prehistory were developed by Warren (1968) and King (1981, 1990), which utilized the growing archaeological datasets of specific subregions within southern California to define increasingly localized cultural sequences.

Table 1. Prehistoric Cultural Chronology

Period	Key Characteristics	Date Range
Early Man	• Diverse mixture of hunting and gathering • Greater emphasis on hunting	ca. 10,000–6000 B.C.
Milling Stone	• Subsistence strategies centered on collecting plant foods and small animals • Extended and loosely flexed burials	6000–3000 B.C.
Intermediate	• Shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods • Trend toward greater adaptation to regional or local resources • Fully flexed burials, placed facedown or faceup, and oriented toward the north or west	3000 B.C.–A.D. 500
Late Prehistoric	• Increase in the use of plant food resources, as well as an increase in land and sea mammal hunting • Increase in the diversity and complexity of material culture • Increased usage of the bow and arrow • Increase in population size, accompanied by the advent of larger, more permanent villages	A.D. 500–ca. 1769

Gabrielino Ethnography

The Project site is in an area historically occupied by the Gabrielino (Bean and Smith 1978:538; Kroeber 1925:Plate 57). Surrounding Native American groups included the Chumash to the northwest, the Tatataviam/Alliklik to the north (who traditionally occupied the San Fernando Valley and some of the surrounding areas), the Serrano to the east, and the Luiseño/Juaneño to the south (Figure A-5). There was well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

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

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

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

in the remainder of this report to designate Native people of the Los Angeles Basin and southern Channel Islands and their descendants.

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

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

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

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

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

Locating Former Native American Settlements

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

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

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

Still, within the range of terms put forth to characterize different types of Native American settlements, there are conventions and core insights shared among scholars. Prehistoric sites in coastal California, for example, are commonly referenced in archaeological sources as residential sites, habitation sites, and seasonal camps, whereas the term village is more often used to reference Mission period settlements such as the Chumash site of Humaliwo, Helo', and Muwu, or Luiseño sites such as Topomai (Ciolek-Torello and Garraty 2016:69). These Spanish and Mexican period sites are also sometimes referred to as rancherias—a term with connotations for a more permanent settlement and often used synonymously with village. The convention was established by Hugo Reid in 1852, who published the first list of Native American placenames in the Los Angeles area, which was by no means comprehensive (Stoll et al. 2016: 387–389). The more generic terms of settlement and site will be used in this report and refer to places where Native American communities were once gathered. Native American sites may also refer to locations where archaeological materials, including human remains, have been discovered. Such locations may consist of one or more known tribal cultural resources or a general area in which a tribal cultural resource could exist.

Native American Communities in the Downtown Los Angeles Area

Although the precise location of any given settlement is subject to much speculation, it is clear that the banks of the Los Angeles River were home to many Gabrielino villages throughout the greater Los Angeles area. The closest ethnographically documented village to the Project site is Yaanga (alternative spellings and names include Yang-na, Yangna, and Yabit; Figure A-6 and Figure A-7). Though the actual location is disputed, generally Yaanga is believed to have been located near present-day Union Station, approximately 2.4 km (1.5 miles) north of the Project site (McCawley 1996:57; Morris et al. 2016; see Figure A-6 and Figure A-7). Historical records place Yaanga near Los Angeles's original plaza, near

present-day Union Station (see Figure A-7). Historians and archaeologists have presented multiple possible village locations in this general area; however, like the pueblo itself, it is likely that the village was relocated from time to time due to major shifts of the Los Angeles River during years of intense flooding. Dillon (1994) presented an exhaustive review of the potential locations, most within several blocks of the pueblo plaza. Johnston (1962:122) concluded that "in all probability *Yangna* lay scattered in a fairly wide zone along the whole arc [from the base of Fort Moore Hill to Union Station], and its bailiwick included as well seed-gathering grounds and oak groves where seasonal camps were set up." A second village, known as Geveronga, has also been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles, though much like Yaanga, its location can only be inferred from ethnographic information (McCawley 1996:57). The approximate location for Geveronga is 3.2 km (2 miles) northwest of the Project site (see Figure A-6 and Figure A-7).

Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence of the location of either village has been produced to date. Archaeological materials reportedly were unearthed during the construction of Union Station in 1939, and "considerably more" in 1970 during the rebuilding of the Bella Union Hotel on the 300 block of North Main Street, 1 mile northeast of the Project site (Johnston 1962:121; Robinson 1979:12). The preponderance of available evidence indicates that there were one or more early Historic-period Native American communities west of the Los Angeles River near the original plaza site. This assumption is supported through several lines of ethnographic evidence, including the expedition journal of Fr. Juan Crespi and engineer Miguel Costansó, both of whom were associated with the 1769 Portolá expedition. The notes from these sources indicate the village was located between 2.0 and 2.4 km (between 1.3 and 1.5 miles) west-southwest from the Los Angeles River on high-level ground. The Pueblo of Los Angeles was documented to have been founded directly adjacent to this village. The location of Yaanga was also referenced by long-time Los Angeles resident Narciso Botello and Gabrielino consultant José María Zalvidea, who indicated that Yaanga was originally located adjacent to the original site of the Los Angeles Plaza (Morris et al. 2016:112).

After the settlement of Los Angeles in 1781, Yaanga faced many new challenges because of its proximity to the new city. The last recorded birth at Yaanga is believed to have been in 1813, after which the village was forced to relocate south of the original site (Morris et al. 2016:97). This new village, known as Ranchería de los Poblanos by the Angelenos, is believed to have been located at the intersection of Los Angeles Street and 1st Street (Morris et al. 2016:96–97; see Figure A-7). This rancheria existed for approximately 10 years, between 1826 and 1836, after which the indigenous population was forced to relocate to a plot of land near Commercial and Alameda Streets (Morris et al. 2016). This rancheria existed for approximately another 10 years, between 1836 and 1845, during which nearby landowners attempted to forcibly relocate them to obtain more land for agricultural use. The City Council session on June 7, 1845, reports that the village be moved to the "height across the river, at the most convenient place, defining the most orderly location." Ultimately, it required a special commission to prompt the move, which did not happen until December 22, 1845 (Phillips 2010:196). The new site was called "Pueblito," but the location was only generally described as an area "across (east of) the river" or near the "Spring of the Abilas" or simply as "Boyle Heights" (Guinn 1915; Robinson 1938; Phillips 2010; Morris et al. 2016). Pueblito was razed in 1847, at which time legislation was passed to require the indigenous population to live in dispersed settlements or with their employers throughout the city.

There was another rancheria within the boundaries of Los Angeles during this time composed of Island Gabrielino—Rancheria de los Pipimares. The rancheria may have been in existence from as early as 1820 but ceased to exist after 1846 (Morris et al. 2016). Archival research identified the likely location of Rancheria de los Pipimares to be within the area of San Pedro and 7th Streets (Morris et al. 2016; see Figure A-7), approximately 1.4 km (0.9 mile) northwest of the Project site. Reports describe the Gabrielino at Rancheria de los Pipimares taking part in festivals and mourning ceremonies, which were

known to spread over large areas of land. This rancheria was likely a community of Native Americans from San Nicolas Island, who are noted as having practiced the tradition of inhuming their dead, as opposed to the cremation practiced by mainland tribes. Directly east of San Pedro Street and south of 7th Street was the property of Jose Jacinto Reyes, godfather of more Island Gabrielino than anyone else in the city. The Reyes land was later passed on to Luis Lamoreau, who in 1846 filed two petitions to move the residents of Rancheria de los Pipimares to the "general village," likely Pueblito (Morris et al. 2016). This increases the probability that the Rancheria de los Pipimares was indeed located along the west side of 7th Street.

HISTORICAL DEVELOPMENT OF THE PROJECT VICINITY

The Project site is located at the southern edge of the City's boundary when it was incorporated in 1849. In the first map of Los Angeles, surveyed by E. O. C Ord in 1849 (Ord et al. 1957), the Project site can be seen plotted at the southern edge of agricultural fields that were developed south of the historic core surrounding the church and Los Angeles Plaza. Ord's map shows several roads west of the Project site that include portions of what would later become present-day Alameda Street, 8th Street, and McGarry Street (see Figure A-7). Another road is present north of the Project site that extends from Alameda Street to the west to an area that is currently 7th Street to the north of the Project site. This road is no longer present. The agricultural properties included vineyards, stands of fruit and nut trees, and other crops such as corn and wheat. Farms in this area varied in size and shape—ranging up to approximately 50 acres with boundaries defined within a non-linear street grid—and were irrigated by water from Zanja Nos. 1, 2, 3, and 4. Zanja Nos. 1 and 2

Development began to increase in the area in the latter half of the nineteenth century. With the completion of the railroad sparking what turned into a population boom in the 1880s, developments expanded from the historic core, especially to the west. The 1880s population boom resulted quickly in the subdivision of the small farms in the vicinity of the Project site into lots, initially sold for primarily residential and commercial properties. However, industrial developments quickly came to define various areas in vicinity of the Project site. The City Council's decision to create an industrial district between Main Street and the river and subsequent zoning changes in the 1910s quickened the conversion of the area into a fully industrial sector, with few remaining residences and an increasing number of manufacturers establishing warehouses and other facilities. Through the 1890s and into the early twentieth century, the City annexed new lands, and the large lots originally surveyed in the 1850s were subdivided and developed into city blocks with residential buildings being erected around the Project site. While residential housing did increase, agricultural lands, such as orchards, existed until the end of the nineteenth century. By 1921 the entire area was heavily developed with commercial properties, as well as pockets of residential neighborhoods and railroad yards.

The rapid industrialization of the neighborhood was primarily driven by the proximity to several railways and freight depots. Atchison, Topeka, and Santa Fe Railway (AT&SF), built in 1887, ran just east of the Project site along the Los Angeles River, while Southern Pacific Railway tracks ran along Alameda Street to the west. Opened in 1893, the AT&SF La Grande Station, located north of the Project site on 2nd Street and Santa Fe Avenue, served as the railroad's main passenger terminal until the opening of Union Station in 1939. To the north at Central Avenue and 4th Street at the convergence of three railways – the Los Angeles Railway Company, Pacific Electric Railway Company, and the Los Angeles Inter-Urban Railway Company – was the Arcade Depot, built in 1888 in a Victorian style. The Arcade Depot was dismantled in 1915, after the Southern Pacific Railroad opened its Central Depot at Central and Fifth Street. Smaller gauge railroad spurs were constructed along many of the smaller streets to connect each block to the primary rail lines, including at least three smaller rail spurs that extended from the main AT&SF railroad to Carolina Street (now Hewitt Street) and Palmetto Street north of the Project site in the 1910s and 1920s.

The mid-twentieth century saw many changes within the vicinity of the Project site and Los Angeles as a whole from growth in automobile sales and increases in business and commerce. The demise of the city's public transportation system encouraged much of the movement of the largely white, middle class from the city center (Grimes 1998:5). During this time, much of downtown Los Angeles, including the Project site, began transitioning into primarily commercial and business real estate. The construction of Interstate 10 in the late 1950s dramatically transformed the vicinity of the Project site as buildings were razed, streets realigned, and city blocks altered to accommodate its construction. This further shifted the character of the adjacent neighborhoods away from residential developments, even for multi-family properties, and towards more commercial uses.

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM RECORDS SEARCH

Previously Conducted Studies

SWCA received the results of the CHRIS records search from the SCCIC on November 14, 2022. The records search identified 32 cultural resource studies that were conducted within 0.8 km (0.5 mile) of the Project site, none of which were mapped as intersecting the Project site (Table 2; Attachment B). All of these studies were prepared before 2014 when AB 52 was passed, so none specifically address tribal cultural resources.

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

Report Number	Title	Author (Affiliation)	Year	Proximity to Project site
LA-02577	*Results of a Records Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California*	Wlodarski, Robert J. (Historical, Environmental, Archaeological, Research Team)	1992	Outside
LA-02644	*The Results of a Phase 1 Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California*	Wlodarski, Robert J. (Historical, Environmental, Archaeological, Research Team)	1992	Outside
LA-02950	*Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project*	Anonymous (Peak & Associates, Inc.)	1992	Outside
LA-03103	*Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1*	Greenwood, Roberta S.	1993	Outside
LA-03813	*An Archival Study of a Segment of the Proposed Pacific Pipeline, City of Los Angeles, California*	Anonymous (Peak & Associates, Inc.)	1992	Outside
LA-04097	*Council District Nine Revitalization/recovery Program Final Environmental Impact Report*	Anonymous (Myra L. Frank & Associates, Inc.)	1995	Outside
LA-04625	*Historic Property Survey Report for the Proposed Alameda Corridor from the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California*	Starzak, Richard (Myra L. Frank & Associates)	1994	Outside
LA-04834	*Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties*	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Outside
LA-04835	*Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties*	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Outside

Report Number	Title	Author (Affiliation)	Year	Proximity to Project site
LA-05430	*Cultural Resource Assessment for Pacific Bell Wireless Facility SM 003-02, County of Los Angeles, Ca*	Duke, Curt (LSA Associates, Inc.)	2000	Outside
LA-06348	*Cultural Resource Assessment for Pacific Bell Wireless Facility SM 003-02, County of Los Angeles, California*	Duke, Curt (LSA Associates, Inc.)	2000	Outside
LA-07425	*City of Los Angeles Monumental Bridges 1900-1950: Historic Context and Evaluation Guidelines*	McMorris, Christopher (JRP Historical Consulting)	2004	Outside
LA-07427	*Caltrans Historic Bridge Inventory Update: Metal Truss, Movable, and Steel Arch Bridges*	McMorris, Christopher (JRP Historical Consulting)	2004	Outside
LA-07945	*Archaeological Inventory Report: East Downtown Truck Access Improvements Project, Los Angeles, California*	Messick, Peter (Greenwood and Associates)	2006	Outside
LA-08252	*Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch*	Snyder, John W., Stephen Mikesell, and D. Pierzinski (Caltrans)	1986	Outside
LA-08298	*Cultural Resources Record Search and Site Visit Results for Royal Street Communications, LLC Candidate La2915a (Skid Row Trust), 676 South Central Avenue, Los Angeles, Los Angeles County, California*	Bonner, Wayne H. (Michael Brandman Associates)	2007	Outside
LA-08518	*Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Warehouse Building in the City of Los Angeles (Los Angeles County), California*	Taniguchi, Christeen (Galvin and Associates)	2004	Outside
LA-09110	*Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate LA73XC116B (Hardwood), South Santa Fe Avenue, Los Angeles, Los Angeles County, California*	Bonner, Wayne H. (Michael Brandman Associates)	2007	Outside
LA-09271	*Archaeological Resources Assessment and Evaluation of "Maintenance of Way" Building for the Asphalt Plant No. 1 Street Services Truck Route Project City of Los Angeles, California*	Strauss, Monica, Candace Ehringer, and Angel Tomes (EDAW, Inc.)	2007	Outside
LA-10451	*Finding of Effect - 6th Street Viaduct Seismic Improvement Project*	Chasteen, Carrie (Parsons)	2008	Outside
LA-10452	*Historical Resources Evaluation Report - 6th Street Viaduct Seismic Improvement Project*	Smith, Francesca (Parsons)	2007	Outside
LA-10506	*Cultural Resources Monitoring: North Outfall Sewer - East Central Interceptor Sewer Project*	Greenwood, Roberta S., Scott Savastio, and Peter Messick (Greenwood and Associates)	2004	Outside
LA-10638	*Preliminary Historical/ Archaeological Resources Study, Southern California Regional Rail Authority (SCRRA) River Subdivision Positive Train Control Project, City of Los Angeles, Los Angeles County, California*	Tang, Bai "Tom" (CRM Tech)	2010	Outside
LA-10789	*Cultural Resources Technical Report for the Olympic and Mateo Street Improvements Project, City of Los Angeles, Los Angeles County, California*	Carmack, Shannon and Cheryle Hunt (SWCA Environmental Consultants)	2010	Outside
LA-10887	*Historic Property Survey Report for the North Outfall Sewer-East Central Interceptor Sewer, City of Los Angeles, County of Los Angeles, California*	Starzak, Richard, Alma Carlisle, Gail Miller, Catherine Barner, and Jessica Feldman (Myra L. Frank & Associates, Inc.)	2001	Outside

Report Number	Title	Author (Affiliation)	Year	Proximity to Project site
LA-11048	*American Recovery and Reinvestment Act (ARRA) Funded Security Enhancement Project (PRJ29112359) - Improved Access Controls, Station Hardening, CCTV Surveillance System, and Airborne Particle Detection at Los Angeles Station and Maintenance Yard, Los Angeles, California*	Speed, Lawrence (URS)	2009	Outside
LA-11409	*Construction Phase Cultural Resources Monitoring and Treatment Plan for the City of Los Angeles North Outfall - East Central Interceptor Sewer Project*	Horne, Melinda C. (Myra L. Frank & Associates)	2000	Outside
LA-11618	*Los Angeles Wholesale Terminal Market Historic Resource Report*	Grimes, Teresa, Jessica MacKenzie, and Jessica Fatone (Christopher A. Joseph & Associates)	2007	Outside
LA-11642	*Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports*	Daly, Pam, and Nancy Sikes (Cogstone)	2012	Outside
LA-11785	*Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension*	Rogers, Leslie (U.S. Department of Transportation Federal Transit Admin. and LA County Metro Transit Authority)	2012	Outside
LA-12586	*Archaeological Survey Report for the 6th Street Viaduct Improvement Project City of Los Angeles Los Angeles County, California*	Glenn, Brian, and Patrick Maxon (BonTerra Consulting)	2008	Outside
LA-13239	*Extent of Zanja Madre*	Gust, Sherri (Cogstone)	2017	Outside

Previously Recorded Cultural Resources

The CHRIS records search did not identify any known archaeological resources with Native American components.

NATIVE AMERICAN SITES IN DOWNTOWN LOS ANGELES

There are five notable archaeological sites recorded within downtown Los Angeles area that have confirmed or possible affiliations with Native Americans. The sites discussed here are located to the north of the Project site between 1.6 and 2.0 miles. Given the lack of such sites identified in the 0.5-mile radius used for the CHRIS search, they are sites discussed here to provide a more complete characterization of the Native American archaeological record in the downtown Los Angeles area. These are referenced here as a supplement to the CHRIS records search and are based on background research previously conducted by SWCA. The five sites include a major Native American settlement containing multiple human burials (CA-LAN-1575/H), an isolated bone from a Native American who lived more than 3000 years ago (CA-LAN-4662), and two sites (CA-LAN-7/H and P-19-100515) containing a small number of artifacts that could be associated with Native American activities, and the Los Angeles Plaza Cemetery site (CA-LAN-4218H), which historical records document as having individuals of Hispanic, Native American, and varied heritage buried in the cemetery. A map of their locations and more detailed descriptions are included as a confidential attachment (Appendix B), which is excluded from publicly circulated drafts of this report to protect the confidential nature of their contents and location.

SACRED LANDS FILE SEARCH

On November 17, 2022, the NAHC submitted the results of an SLF search. The results of the SLF search were negative. In the response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of 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 10 Native American contacts who may have knowledge of resources in or near the study area and recommended they be contacted prior to work. All such requests for information from tribal parties is being conducted as part of City Planning's notification and consultation requirements pursuant to PRC Section 21082.3.1. No outreach to the parties identified on the NAHC's contact list were conducted by SWCA as part of the current study. The SLF results letter and associated tribal contact list are included in Attachment C.

TRIBAL CONSULTATION

City Planning is still engaged in the process of fulfilling the requirements of PRC Section 21082.3.1. Although this is not specifically required to comply with the PRC, if City Planning does not receive any replies to their written notifications within 15 calendar days of the letters being sent, then SWCA recommends City Planning consider attempting to contact the individuals from the City's AB 52 List through phone or email to inform them the letters have been sent. If after 30 days from the letters having been received, which may vary slightly among the individuals, then City Planning will have fulfilled satisfied the requirements of PRC Section 21082.3.1.

ARCHIVAL RESEARCH

Methods

SWCA's research focused on assessing historical land uses through a review of available archival sources, including various types of written records, photographs, and maps. In addition to the literature sources cited above and listed in the references section below, SWCA's archival research consulted the following publicly accessible sources: David Rumsey Historical Map Collection; Huntington Library Digital Archives; Library of Congress; Los Angeles Public Library Map Collection; USGS historical topographic maps; and University of California, Santa Barbara, Digital Library (aerial photographs). Historical maps drawn to scale are georeferenced using ESRI ArcGIS software suite to show precise relationships to the Project site.

Results

SWCA's archival research included a review of historical maps for the Project site and vicinity and focused on documenting historical modifications to the physical setting and identifying any potential natural or artificial features with relevance to use by Native Americans (e.g., stream courses, vegetation, historical topography, roads, habitation markers) or use of the location by non-Native American people in the historic period. The Project site is located south of downtown Los Angeles south of what is presently known as the Arts District and was included in some of the earliest surveys of the City. The Project site is situated approximately 0.4 mile west of the bed of the Los Angeles River, including two separate historical courses from before 1815 and after 1825 (see Figure A-4 and Figure A-6). At the time of Ord's survey in 1849 and subsequent survey by Hancock in 1857, the Project site was plotted at the southern edge of agricultural fields south of the historic core of the City and west of the Los Angeles River. An 1858 General Land Office Map shows the Project site at the southern edge of City lands and is within an area labeled Lot 37.

An 1877 map of Los Angeles County (Bien 1877) depicts the Project site within the City core and within the northeast corner of a parcel owned by T. Leahy. The 1880s population boom in Los Angeles quickly manifested in the sale and subdivision of the parcels within the Project site. A Real Estate Map in 1884 shows the property straddling the boundaries between two parcels: one owned by O. A. Williams (7.5 acres) in the northern portion and Thomas Leahy (38.1 acres) in the southern portion. Thomas Leahy (1834–1899) was a Los Angeles council member between 1876 and 1879 and arrived in California in 1851 at the age of 17 from County Cork, Ireland. His move was assisted by his uncle, Mathew Keller, who had arrived in Los Angeles in 1849 by way of New Orleans (Los Angeles Revisited 2014). Stevenson's 1884 survey map of Los Angeles depicts a parcel east of Alameda Street, north of 7th Street, and three parcels north of Thomas' parcel as "M. Keller", who is presumed to be Thomas' uncle. Thomas was most likely escaping the great potato famine in Ireland and became a merchant when he arrived in Los Angeles. Leahy soon purchased 46 acres for a vineyard in 1862 from Jose Rubio that included an old adobe. Leahy retired to 8th Street and Alameda Street after being a council member. One of Leahy's sons started Leahy Manufacturing nearby as manufacturing increased in Los Angeles. In 1907, Thomas Leahy's widow, Caroline Leahy, sold the property to Bishop, a cracker and confection company.

Hall's 1888 Irrigation map shows the Project site midway between Zanja No. 1 to the east and Zanja No. 2 to west. A hand-drawn map from 1879 depicts the Project site partially within parcels labeled as Rubio and M. Coronell with Zanja No. 1 running north/south just east of the Project site. As this was a hand-drawn map of the Kiefer parcel, located northeast of the Project site, the landowners of the parcels within the Project site do not appear accurate. "M. Coronell" most likely refers to Antonio Coronel, whose tract is documented as being west of Alameda Street at 7th Street. Antonio Coronel held the offices of city mayor, county assessor, and state treasurer (Los Angeles Revisited 2014). "Rubio" most likely refers to Jose Rubio, who had sold the land to Thomas Leahy in 1862. By 1891, Arthur Solano's parcel map of Los Angeles shows the area southeast of 7th Street and Alameda Street changing ownership from the O.A. Williams parcel to another parcel owned by T. Leahy. This map shows the Project site as partially within the original Leahy parcel and partially within the new parcel transferred from O.A. Williams, with a flume lined with trees and hedges transecting the northern portion of the Project site between Zanja No. 1 and Zanja No. 2.

Archival research focused on maps and aerial photographs of the Project site (1857–1971) to assess historical land uses within the American Period. The Project site is south of the historic core of Los Angeles and at the southern extent covered by E. O. C. Ord's first survey of Los Angeles in 1849, newly ceded to the United States from Mexico. City-wide surveys by Henry Hancock and George Hansen between 1853 and 1857 incorporated newly sectioned lots within the undeveloped areas outside the central urban core; these included numbered 35-acre lots and so-called donation lots within what is now downtown Los Angeles. The Project site is situated within agricultural fields just northwest of Hancock's newly designated lots—Lot 57.

Review of Sanborn maps document the development of the Project site from 1906 to 1953. The first Sanborn map of the Project site, dated 1906, depicts the vicinity of the Project site as subdivided into lots and the east half of the Project site as developed with dwellings fronting Sacramento Street with outbuildings and a large shed. The western portion of the Project site is undeveloped, and the entire northern portion of the block north of the Project site is undeveloped, with the exception of a carpet cleaning business in the northwesternmost lot along Lawrence Street and Shearer Street (present-day Bay Street). By 1921, the majority of dwellings observed on the 1906 Sanborn map are replaced by a large commercial building in the eastern portion of the Project site, which is labeled the "Royal Packing Co." (Building 1) on a Baist real estate map. The Project site is situated in the Thomas Leahy Subdivision of the 8th Street Tract and a train yard is present in the northern portion of the block, directly north of the Project site. One possible dwelling is present west of Building 1, and several are depicted east of Building 1. These dwellings appear to be roughly drawn and it is unclear whether they are the same as the

ones visible on the 1906 Sanborn map. The train yard is depicted north of the Project site with a spur along the northern edge of Building 1 within the Project site. A 1924 topographic map depicts Building 1 and the two possible dwellings east of Building 1 from the 1921 Baist map, as well as a structure intersecting the western portion of the Project site. An updated 1953 reprint of the 1906 Sanborn map shows the Pacific Diamond Bag Company (Building 1) in the eastern portion of the Project site with an attached cleaning business, a trucking yard and a truck company's storage and service building (Building 2) in the central portion of the Project site, and a magazine and paper warehouse (Building 3) in the western portion of the Project site.

An 1894 topographic map depicts the Project site within a small undeveloped area with present-day Wilson Street established along the eastern edge of the Project site. The AT&SF Railroad is plotted east of the Project site along the western bank of the Los Angeles River and a railway spur is present directly north of the Project site. A 1927 aerial photograph shows Building 1 from the 1906 Sanborn map as the only structure in the Project site and the building takes up most of the eastern portion of the Project site, with the remaining portion of the Project site undeveloped. The Southern Pacific railway yard is depicted to the north of the Project site with train cars present. Building 1 is also depicted on a 1928 topographic map.

The Project site remains relatively unchanged through 1947, and by 1952 the structures present on the 1953 Sanborn map are seen on an aerial map. A 1953 topographic map does not show any structures but does depict two railway spurs transecting the edges of the Project site. The Project site remained unchanged through 1965. A 1966 topographic map shows the Project site as appearing to be part of a larger railyard that included several of the surrounding parcels. By 1971, an aerial photograph shows Building 1 no longer present within the Project site and a new building is shown as being constructed in the place of Building 1.

SENSITIVITY ASSESSMENT

Methods

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

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

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

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

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

Results

Native American–Affiliated Archaeological Resources

The CHRIS and SLF searches were negative for tribal cultural resources or potential tribal cultural resources within the Project site or a 0.5-mile radius. SWCA conducted supplemental background research focusing on Native American land uses and settlement patterns in the region, as well as the effects of agriculture and urban development. Several Native American sites were identified in the Project vicinity, the closest are Geveronga and Yaanga.

The Gabrielino settlement known as Yaanga is estimated to have been located in the area between the Los Angeles Plaza and present-day Union Station, approximately 2.4 km (1.5 mile) north of the Project site. Far less is known about another nearby settlement known as Geveronga, which is estimated to have been located somewhere west of Yaanga. The best estimates of its former location place it in a drainage basin formed along the toeslopes of the Elysian Hills, approximately 3.2 km (2 miles) northwest of the Project site. Collectively, these former Native American settlements are considered by SWCA to have been located too far from the Project site such that a buried tribal cultural resource directly associated with their occupation is likely to be located within the Project site. Rather, the presence of pre-Spanish period settlements suggests that certain locations of what is now downtown Los Angeles were indeed important

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

The Project site is west of the Los Angeles River, currently located approximately 0.6 km (0.4 mile) east of the Project site, though within the river's historical floodplain. Shifts in the main channel of the Los Angeles River have occurred numerous times in recorded history, including two significant shifts in 1815 and 1825. The first recorded shift of the river occurred in 1815 when floodwaters overflowed the former channel, shifting the course at least 0.8 km (0.5 mile) to the southwest, near the present route of Spring Street. That flood is reported to have destroyed structures built as part of the original Los Angeles Pueblo (Gumprecht 2001:139–141) and may have also flooded all or parts of the Native American site of Yaanga, which is believed to have been located nearby.

The general proximity of the Project site to areas of known habitation, the river, and broad travel corridors has the effect of an overall increase in the sensitivity for unknown tribal cultural resources, at least higher than low background levels, particularly for the archaeological remains of temporary open camps. Such camps are typically identified by the presence of hearth features, ground stone, and other types of artifact assemblages. However, additional factors related to preservation of such materials are considered with respect to alluvial depositional settings within the Los Angeles River floodplain and are discussed below.

The Project site is situated northwest of the reported location of Rancheria de los Pipimares—a village site occupied by Gabrielino from San Nicolas Island (known as Nicoleño) during the early and middle parts of the nineteenth century. Rancheria de los Pipimares is estimated to have been between 7th and 8th Streets, west of San Pedro Street, which is approximately 1.4 km (0.9 mile) northwest of the Project site. Other nearby rancherias occupied during the historic period by Gabrielino and other Native Americans include Rancheria de los Poblanos, one unnamed settlement, and Pueblito (on the east side of the Los Angeles River). Because the location of the historic period rancherias can be traced to streets and City blocks included in the contemporary street grid, and the activities associated within those settlements are believed to have been more geographically constrained, the influence on tribal cultural resource sensitivity is similarly confined to smaller areas, with little to no influence on the sensitivity within the Project site.

The Project site is on the southeastern portion of the City's original 1849 annexation boundary. Maps and historical accounts characterize the Project site and surroundings as open fields used for livestock grazing and growing corn. The first development identified within the Project site are single-family residences, present by 1906. The Project site was subject to re-development prior to 1921 during which time several Historic-period buildings were constructed and demolished. These construction-demolition episodes have compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been deposited on the surface or shallowly buried.

It has been demonstrated elsewhere in the downtown portion of Los Angeles that deeply buried archaeological deposits can exist within alluvium below Historic-period disturbances and may also be intermixed with Historic-period debris. Alluvial deposits within the Los Angeles Basin can be massive, extending hundreds of feet below the surface, and may contain sediments deposited before

human occupation of North America. Furthermore, most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, while low-energy floods tend to produce more favorable environments for the preservation of cultural materials. Thus, low-energy alluvial sediments dating to the late Pleistocene or Holocene time periods have the greatest potential for preserving tribal cultural resources. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered. Also, such soil conditions are an indicator of a setting favorable for preservation, but the presence of soils with these properties is not an absolute indicator of tribal cultural resource presence.

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

Whatever the reason for intensified use by Native Americans adjacent to the river (current or former alignments) during the Prehistoric and Ethnohistoric periods, disturbances from natural erosional processes and historical development reduce the likelihood that any physical traces of those activities remain preserved as archaeological deposits. The preservation conditions in the former floodplain of the Los Angeles River are known to vary widely over the time period in which Native Americans have been living in the Los Angeles Basin. Sediment profiles taken along the Los Angeles River show regular periods of high-energy deposition in the form of large gravelly strata, intermixed with evidence of low-energy deposition in the form of silty or clayey deposits with lower gravel content and size. The CHRIS records search results identified a site in which a 3,600-year-old femur from a Native American (P-19-004662) was recovered 19 feet below the surface within the Los Angeles River floodplain. That the bone was found in isolation and in a sediment matrix typical of high-energy deposition (i.e., flooding) strongly suggests the bone was redeposited from another location. In contrast, archaeological deposits that may have once been on the surface or shallowly buried are very unlikely to be preserved where excavation for large-scale grading occurred within the Project site.

The deposit of alluvial sediments within the Los Angeles River floodplain is capable of preserving deposits of archaeological materials where low-energy flood events occur; however, high-energy flood events create settings that are very unlikely to preserve archaeological remains. Given the intensive modifications to the surface and subsurface within the Project site, SWCA finds that the Project site has a **low sensitivity for containing archaeological resources affiliated with Native Americans.**

PRELIMINARY IMPACT ANALYSIS AND MANAGEMENT RECOMMENDATIONS

Tribal consultation pursuant to PRC Section 21082.3.1 remains on-going for the Project. If consultation is initiated with any of the tribal parties from the City's AB 52 Consultation List who received notification letters, then they may contribute new information, reach a different conclusion regarding the potential for impacts, or request mitigation measures. If this information is submitted as part of the government-to-government consultation, then the results of this study may need to be revised, or the findings presented in the Project's overall CEQA analysis may vary from the analysis and conclusions presented here.

SWCA's analysis included a search of the CHRIS and SLF that returned negative results for any previously recorded sites or resources that may be a tribal cultural resource. Supplemental analysis indicated that the nearest previously recorded archaeological sites with Native American components are

located between 1.6 and 2.0 miles to the north of the Project site, which is too far to suggest any directly associated material components may be preserved within the Project site. The potential for a buried tribal cultural resource was assessed for the Project site and considered the results of SWCA's review of ethnographic and academic literature, historical land uses, local geology, and soils. There have been notable occurrences of Native American skeletal remains having been recovered from within high energy flood plain deposits from past courses of the Los Angeles River to the north of the Project Site, and evidence from the geotechnical bores and geology indicates that these types of deposits occur at depth in the Project site. However, the occurrence of a tribal cultural resource in such deposits is exceedingly rare when compared with the total volume of such flood plain deposits in the Los Angeles Basin. SWCA's assessment found that there is a low potential for a buried tribal cultural resource that is archaeological in nature to be encountered within the Project site.

While SWCA's assessment found a low likelihood for a tribal cultural resource that is archaeological in nature to be preserved beneath the Project site, the possibility for a buried tribal cultural resource cannot be completely ruled out, and any deeply buried Native American artifacts or sites are likely to be a tribal cultural resource and would require evaluation and treatment if identified. If Native American artifacts are identified within so-called fill soils as part of a shallower deposit, these would also have to be assessed by a Native American tribal party to determine whether they meet the criteria to be considered a tribal cultural resource.

To ensure that any as-yet unidentified tribal cultural resources are evaluated and treated accordingly during ground-disturbing activities for the Project, SWCA recommends City Planning impose their standard condition of approval for the inadvertent discovery of tribal cultural resources. This assumes that City Planning does not receive a request for mitigation measures from a consulting tribal party. If any measures are requested by consulting tribes, then SWCA recommends they be assessed in terms of their adequacy and need after considering whether substantial evidence exists for the presence or likelihood for a tribal cultural resource. Based on the based on the available information and the above considerations, **SWCA finds that the potential for impacts to a tribal cultural resource under CEQA is less than significant.**

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ATTACHMENT A

Report Figures

Figure A-1. Project vicinity.

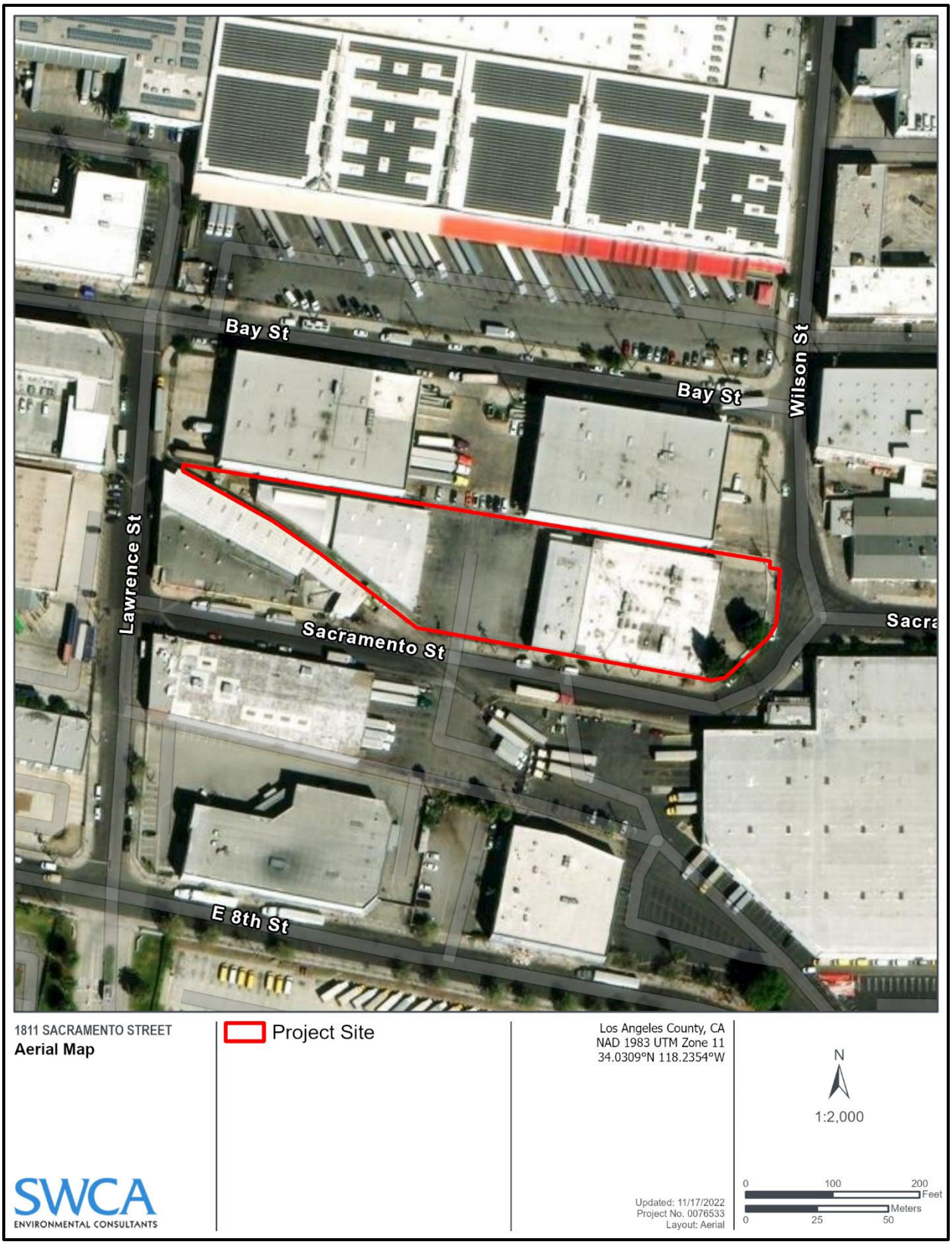

Figure A-2. Project site plotted on a 2020 aerial.

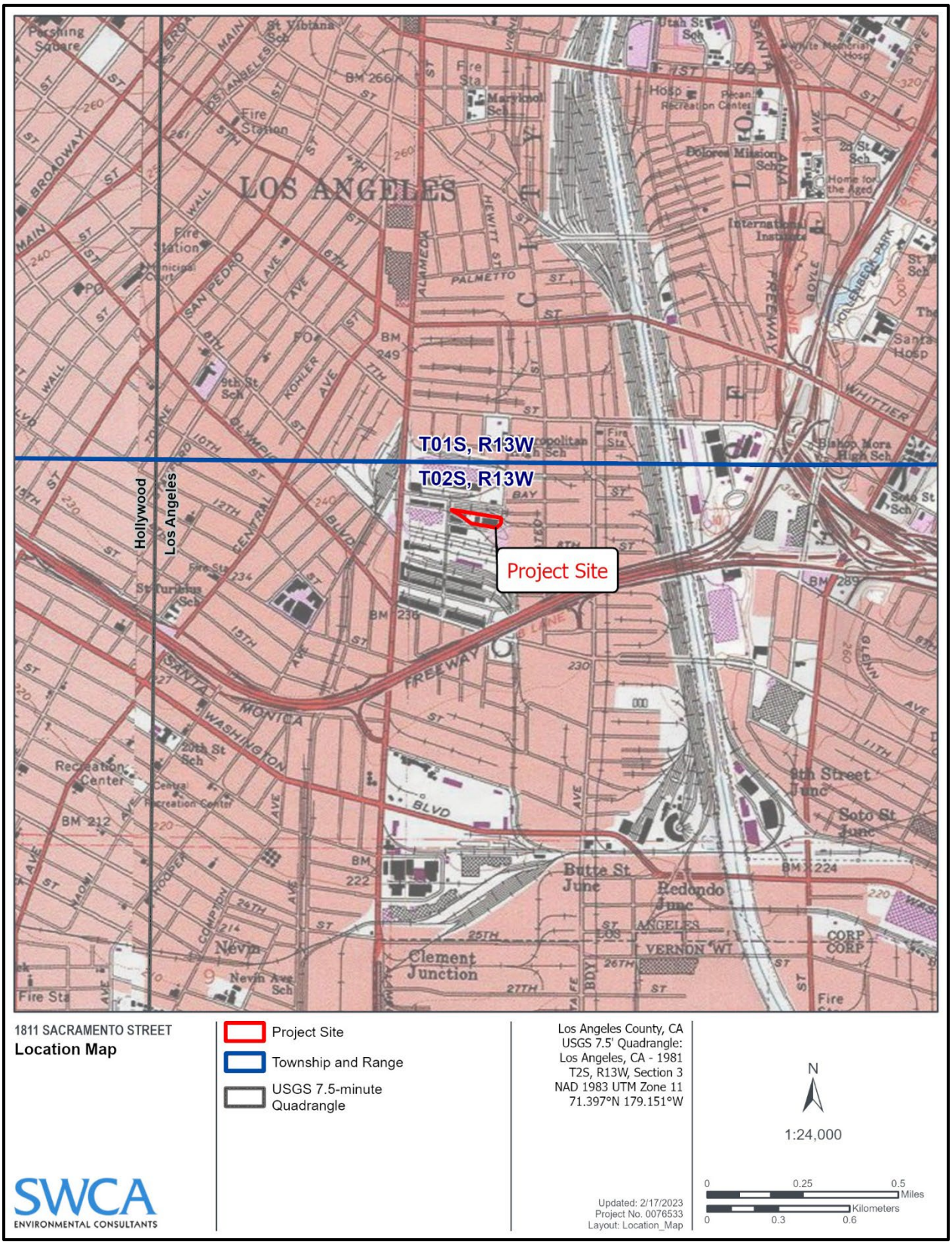

Figure A-3. Project location plotted on USGS Los Angeles, California, 7.5-minute quadrangle.

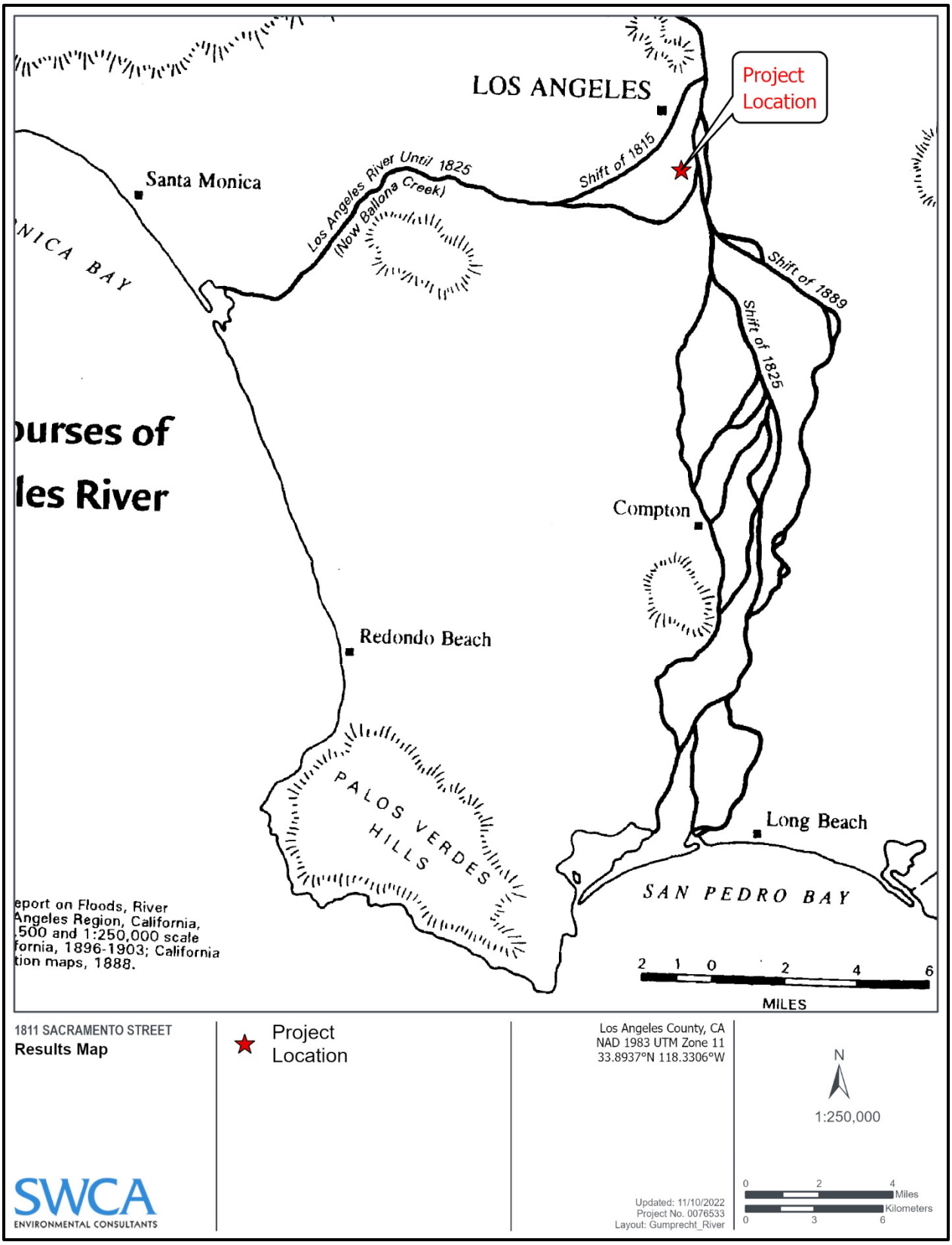

Figure A-4. Multiple courses of the Los Angeles River channel as depicted by Gumprecht (2001:140).

Figure A-5. Native American territorial boundaries based on ethnographic and tribal sources.

Figure A-6. Native American settlements, sites, placenames, and historical points of reference.

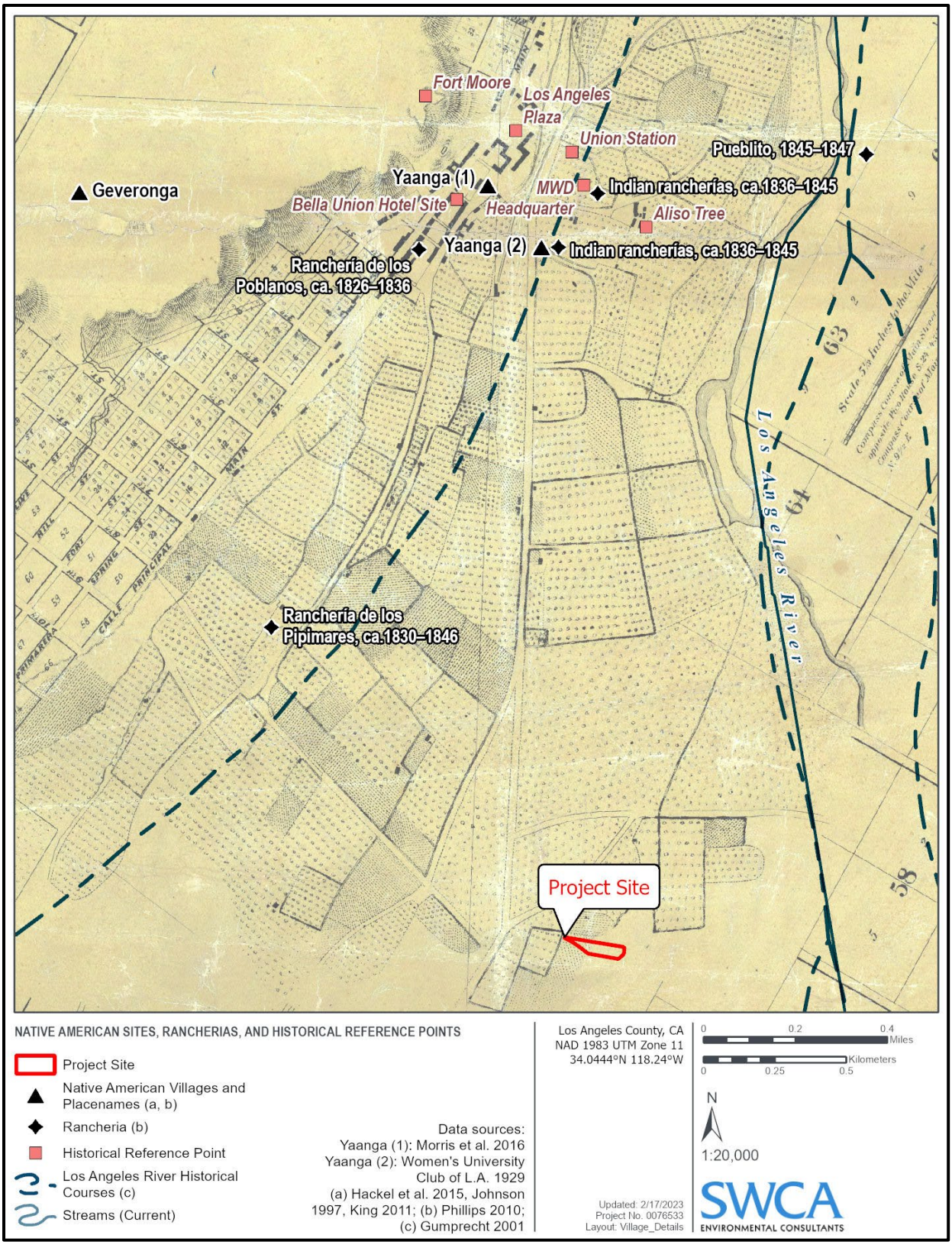

Figure A-7. Project site and Native American village sites, placenames, and historical points of reference plotted on an appended copy of Hancock's 1857 City map (based on Ord's 1849 original).

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ATTACHMENT B

California Historical Resources Information System Records Search Results

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Archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure of information regarding their location. This document contains sensitive information regarding the nature and location of archaeological sites, which should not be disclosed to the general public or unauthorized persons pursuant to California Government Code 6254(r) and 6254.10.

Information regarding the location, character, or ownership of a cultural resource is exempt from the Freedom of Information Act pursuant to 54 USC 307103 (National Historic Preservation Act) and 16 USC Section 470(h) (Archaeological Resources Protections Act)

ATTACHMENT C

Sacred Lands File Search

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