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# **Appendix C**

## Archaeological Resources Assessment



January 23, 2024

14914

Brian Kearny  
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Johnson Development Associates, Inc.  
101 North Pacific Coast Highway, Suite 308  
El Segundo, California 90245

**Subject: Archaeological Resources Assessment for the JDA Woodland Hills Project, City of Los Angeles, Los Angeles County, California**

Dear Mr. Brian Kearney:

This letter report documents the archaeological resources assessment conducted by Dudek for the JDA Woodland Hills Project (proposed Project). The study documents the results of a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC); Native American coordination including a review of the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF); review of geotechnical, archival, academic, and ethnographic information; an archaeological pedestrian survey; an analysis of the potential for the proposed Project site to contain archaeological resources; as well as management recommendations. The Project proponent (Applicant) is Johnson Development Associates, Inc and the City of Los Angeles (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). This report satisfies all applicable requirements for assessment of archaeological resources in accordance with the CEQA and the City of Los Angeles. This report was prepared by Dudek Archaeologists, Linda Kry, BA, RA and Heather McDaniel McDevitt, MA, RPA. Ms. McDaniel McDevitt meets the Secretary of the Interior standards, served as Principal Investigator, provided general oversight of the study and is responsible for quality control and assurance. Dudek staff archaeologists and technicians Jennifer De Alba, BA, Brenda Rogers, BA, Lanette Renz, BA and John Connor Wilcox conducted the pedestrian survey, archival research and wrote portions of the report.

## Project Location

The proposed Project site includes the property located at 21101 Ventura Boulevard in the northern area of the City of Los Angeles, within the Canoga Park–Winnetka–Woodland Hills–West Hills community, and consists of one parcel (Assessor's Information Number [AIN] 2167-001-010). The proposed Project site is located within public land survey system (PLSS) Section 18 of Township 1 North, Range 16 West on the Canoga Park, California 7.5-minute USGS Quadrangle (Appendix A: Figure 1). The proposed Project site is bordered to the north by Clarendon Street and US Highway 101 Freeway (Ventura Freeway), to the east by Alhama Drive, to the south by Ventura Boulevard, and to the west by commercial uses and paved parking lots (Appendix A: Figure 2).

## Project Description

The proposed Project involves minor improvements to the existing Courtyard Marriot Hotel on site (i.e., configuration of the hotel's pool and parking areas), and construction of a six-story, 112,204-square foot self-storage facility on an approximately 2.5-acre site (gross area). The proposed Project development would consist of one, six-story above grade self-storage building with internal office space, loading areas, and surface parking. The Project proposes minor improvements to an existing hotel on the site, which would include the configuration of hotel parking areas, demolition of the existing hotel swimming pool, and construction, use, maintenance of a new pool and ancillary structures to the eastern portion of the hotel project site. Vehicular access to the entire project site would be provided by two (2) new driveways, one on Clarendon Street for access to the mixed-use site, and one on Alhama Drive, that would provide access to the existing hotel site, both leading to internal parking spaces for both accessible and passenger vehicles. Two existing driveways from Ventura Boulevard and Alhama Drive are to remain with access to the existing hotel site.

The proposed Project would also include improvements along the proposed Project's street frontage, including landscaping and street and sidewalk improvements. A variety of trees, shrubs, and groundcovers would be planted within the proposed Project frontage's landscape setback area, within the landscape areas found around the self-storage building. The proposed Project site is currently served by domestic water, sanitary sewer, electrical, natural gas, and telecommunication service and would connect to the existing facilities located on and in the immediate vicinity of the proposed Project.

The proposed Project would also involve the construction of a new engineered storm drain system to collect and treat on-site and off-site stormwater runoff. On-site stormwater will be collected via a series of roof drains, curbs, and gutters, and catch basins before being conveyed to an on-site underground infiltration/detention basin located in the southeastern corner of the proposed Project site.

Based on a review of the current geotechnical report prepared for the proposed Project and the recommendations provided therein (Leighton 2022), the depths of ground disturbance for the proposed Project site are between 5 to 8 feet below existing ground surface across the proposed Project site including removal of fill soils, foundations and underground utilities. It should be noted that site grading is not expected to require significant cut or fill.

## Environmental Setting

The approximately 2.5-acre proposed Project site is situated in the west San Fernando Valley area, over 1.5 miles north of the Santa Monica Mountains foothills, approximately 7 miles south of the Santa Susana Mountains, and over 4 miles east of the Simi Hills. The Pacific Ocean is nearly 9 miles to the south and the manmade Chatsworth Nature Preserve and Reservoir and Encino Reservoir are approximately 4.5 miles to the southeast, and 4 miles to the northeast, respectively. The proposed Project site is relatively flat with an approximate elevation of  $\pm 900$  feet mean sea level (msl).

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2022a), soils within the proposed Project site consist of Cropley-Urban land complex. The Cropley soil series of which are present within the proposed Project site, is characterized as very deep, moderately well drained soils that formed in alluvium from mixed rock sources. Cropley soils are found on alluvial fans, floodplains and in small basins and have slopes of 0 to 2 percent, with a typical pedon that extends from 0 to 63 inches below ground surface (bgs) (USDA 2022b).

A review of the United States Geological Society (USGS) mineral resources (USGS 2022) online spatial data for geology indicates that native soils within the Project site are comprised of Older Quaternary alluvium and marine deposits from the Pleistocene epoch. The terminal Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use that have potential to preserve cultural material in context, depending on area-specific topographical setting.

The proposed Project Site is located in a highly developed part of the City and is surrounded by an urbanized mix of land uses. The entirety of the proposed Project Site is developed by commercial use including a structure, paved parking lots and ornamental landscape trees and vegetation. According to the Los Angeles County Assessor's website, the existing commercial building on site was constructed in 1966.

## Regulatory Context

Preparation of this Report was conducted in compliance with the California Environmental Quality Act (CEQA). The regulatory framework as it pertains to cultural resources under CEQA is detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC Sections 21083.2 and 21084.1), the CEQA Guidelines (14 CCR 15064.5), and California Public Resources Code (PRC) Section 5024.1 (14 CCR 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for California Register of Historical Resources (CRHR) eligibility (PRC Section 5024.1).

The purpose of the CRHR is to maintain listings of the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term historical resources includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR 15064.5[a]). The criteria for listing properties in the CRHR were developed in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP). The California Office of Historic Preservation regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation (OHP 1995:2).

### State

#### The California Register of Historical Resources

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing on the CRHR. The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

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; or
4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a “unique archeological resource” as defined in PRC Section 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:

- 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:
  - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
  - Has a special and particular quality, such as being the oldest of its type or the best available example of its type
  - Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a “unique archaeological resource” under CEQA (PRC Section 21083.2) are viewed as not significant. Under CEQA, “A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” (PRC Section 21083.2[h]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

## California State Assembly Bill 52

Assembly Bill 52 of 2014 (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.

## Consultation with Native Americans

AB 52 formalizes the consultation process between lead agencies and tribal representatives, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with a project area. This includes 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.

## Tribal Cultural Resources

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

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

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects 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]).

## Senate Bill 18

The Local and Tribal Intergovernmental Consultation process, commonly known as Senate Bill (SB) 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to “allow the protection of cultural places in open space element of the general plan” and amended Civil Code Section 815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

### Native American Historic Cultural Sites

The Native American Historic Resources Protection Act (California Public Resources Code Section 5097, et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NRHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

### California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

### 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 nonunique 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 nonunique 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 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.

### Local

#### City of Los Angeles General Plan

##### Conservation Element

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City’s policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes (City of Los Angeles 2001).

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

Of these two additional types of historic designations, only one, HCM, is applicable for the purposes of this archaeological study and is therefore further explained below.

## Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monuments (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):

An HCM 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 the following four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria and are numbered for clarity:

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.

## City of Los Angeles Stand Conditions

### Archaeological Resources Inadvertent Discovery

In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

## Human Remains Inadvertent Discovery

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:  
1104 N. Mission Road Los Angeles, CA 90033  
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

## Tribal Cultural Resources Inadvertent Discovery

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-0016.
- If the City determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

## Background Research

### SCCIC Records Search

On November 3, 2022, Dudek conducted a search of the CHRIS at the SCCIC, located on the campus of California State University, Fullerton. The search included any previously recorded cultural resources and investigations within a 0.5-mile radius of the proposed Project site. The CHRIS search also included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. Confidential Appendix B provides the supporting documentation of the records search results summarized in the following sections.

### Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicate that 11 cultural resource studies have been conducted within the records search area of the proposed Project site between 1973 and 2013. Of these previous studies, three (3) overlap and two (2) are adjacent the proposed Project site. Table 1 details all 11 previous cultural resources studies followed by brief summaries of the reports that overlap or are adjacent to the proposed Project site.

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

SCCIC Report No.	Authors	Year	Title	Proximity to Proposed Project Site
LA-00377	Van Horn, David M.	1978	Ultrasystems Project: Archaeological Survey	Outside

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

SCCIC Report No.	Authors	Year	Title	Proximity to Proposed Project Site
LA-00657	Drews, Michael M. and Ellen McCann	1980	An Archaeological Resource Assessment for a 11.86 Acre Parcel of Land in Woodland Hills, Los Angeles County, California	Outside
LA-02409	Stelle, Kenneth and Albert Galiardo	1982	For Improvements of the Operational Characteristics of Route 101, the Ventura Freeway in Los Angeles and Ventura Counties, Between Route 405 in Los Angeles, and the Santa Clara River in Oxnard	Adjacent
LA-03472	Singer, Clay A.	1995	Report on Archaeological Survey of the Zuma Loop Trail Segment in Los Angeles County, California	Outside
LA-03635	Anonymous	1973	Draft Master Environmental Assessment Warner Center Woodland Hills, California a Development of Kaiser Aetna	Outside
LA-06141	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. Vy 156-01 Los Angeles, California	Overlaps
LA-07143	Harper, Caprice D.	2004	Cultural Resource Assessment Cingular Wireless Facility No. Vy 156-04 Woodland Hills, Los Angeles County, California	Outside
LA-07840	Sylvia, Barbara	2001	Negative Archaeological Survey Report for the Beautification and Modernization Along Route 134 From the 134/170 Separation to Shoup Ave UC, and Along Route 101 From the 101/170 Separation to Concord Street UC	Outside
LA-10208	Sylvia, Barbara	2001	Negative Archaeological Survey Report: Metal Beam Guardrail (MBGR) Along Sections of Route 101 From Route 134 to the Ventura County Line.	Adjacent
LA-12364	Bonner, Wayne and Crawford, Kathleen	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate NLO502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California	Overlaps



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

SCCIC Report No.	Authors	Year	Title	Proximity to Proposed Project Site
LA-12364A	Bonner, Wayne H. and Kathleen A. Crawford	2013	Direct APE Historic Architectural Assessment for AT&T Mobility, LLC Candidate NL0502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California, CASPR No. 3551454977	Overlaps

Report LA-02409

*For Improvements of the Operational Characteristics of Route 101, the Ventura Freeway in Los Angeles and Ventura Counties, Between Route 405 in Los Angeles, and the Santa Clara River in Oxnard* (Stelle and Galiardo 1982), is a Draft Environmental Impact Statement (EIS) that documents the results of a “traffic operational study and environmental analysis,” for a segment of the U.S. Route 101 corridor (Ventura Freeway), within Ventura and Los Angeles Counties, between the San Diego Freeway (Interstate 405) and Santa Clara River and east of California State Route 126 (Santa Paula Freeway). The area of study is adjacent to the north outside of the proposed Project site, within the right-of-way (ROW) for the Ventura Freeway. The CEQA analysis was conducted to reduce traffic congestion, increase safety, improve air quality, and reduce fuel consumption and the California Department of Transportation, District 7 (Caltrans) was the federal lead agency for the project. A CHRIS records search and archeological survey with a Native American representative present was performed as part of the archaeological impacts analysis in support of the EIS. The study identified one site, CA-VEN-654/H, located on the north side of the Ventura Freeway, may extend into the ROW of the project and therefore, determined that area was environmentally sensitive and required that no construction activity take place outside the existing shoulders within the area of sensitivity. Dudek reviewed the segment of the Ventura Freeway corridor representing the study area for the Draft EIS in conjunction with the site record for CA-VEN-654/H and determined that the area is located approximately 15 miles west and well outside of the current proposed Project site. Therefore, the findings and recommendations of the EIS are not applicable to the present proposed Project site.

Report LA-06141

*Cultural Resource Assessment Cingular Wireless Facility No. Vy 156-01 Los Angeles, California*, (Duke 2002), documents the results of a cultural resource assessment consisting of a review of CHRIS records search data. The area of study overlaps the central portion of the current proposed Project site, specifically addressing the existing Courtyard by Marriot Hotel and was conducted to identify historic properties to determine potential impacts as a result of the proposed project. The study stated that the existing Courtyard by Marriot Hotel did not meet the criteria as a historic property because it was only 36 years old at the time of the 2002 study. The study findings were that no historical resources would be affected by the proposed project. The study further notes that “because the facility meets the definition of a collocation under the guidelines of the *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*, it is not subject to the review and consultation process set forth under Subpart B of 36 CFR 800.” No recommendations for archaeological resources were included within the report.

## Report LA-10208

*Negative Archaeological Survey Report: Metal Beam Guardrail (MBGR) Along Sections of Route 101 From Route 134 to the Ventura County Line* (Sylvia 2001), documents the results of a Phase I cultural resources assessment consisting of a CHRIS records search, literature review, and windshield survey conducted on behalf of Caltrans, the federal lead agency for the project. The project proposed installation of a metal beam guardrail along the ROW for State Route (SR) 101 extending from SR 134 to the Ventura County line that is adjacent and north of the current proposed Project site. The study did not result in the identification of any known archaeological or historical resources and included the Caltrans policy for inadvertent discovery of cultural materials during construction activities.

## Report LA-12364

*Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate NLO502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California* (Bonner and Crawford 2013a), documents the results of a CHRIS records search and site visit to determine the area of potential effect (APE) for the proposed project located at 21101 Ventura Boulevard. Due to the developed nature of the direct APE, no pedestrian survey to identify archaeological resources was conducted. The area of study overlaps the central portion of the current proposed Project site, specifically addressing the existing Courtyard by Marriot Hotel. The study was prepared in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 to assess the proposed installation of 12 new panel antennas and associated equipment cabinets on a proposed steel platform on the rooftop of the existing hotel as well as a 5-foot wide pedestrian access path and a 12-foot wide parking area. The direct APE included the existing hotel and proposed telecommunications facility and the indirect APE included a 0.25-mile buffer surrounding the direct APE. The findings of the study included a recommendation to evaluate the hotel building, that was 47 years old at the time, for significance under Section 106 of the NHPA. This evaluation was conducted and is documented in LA-12364A (see next report summary).

## Report LA-12364A

*Direct APE Historic Architectural Assessment for AT&T Mobility, LLC Candidate NLO502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California* (Bonner and Crawford 2013b), was prepared in compliance with Section 106 of the NHPA of 1966 and documents the results of a historic architectural assessment and evaluation of the building present on the subject property, the Courtyard by Marriot Hotel, identified in Report LA-12364. According to the findings of this report, the existing hotel was found ineligible for listing on the National Register of Historic Places and no further studies or mitigation was recommended.

## Previously Recorded Cultural Resources

The SCCIC records indicate that two (2) cultural resources have been previously recorded within 0.5-mile of the proposed Project site. Both resources are historic built environment resources; one of which is located within the proposed Project (P-19-190596; Courtyard by Marriot Hotel). It should be noted that this resource was evaluated in 2013 and determined ineligible for listing on the NRHP; however, the record notes that the resource was not evaluated for CRHR or local listing. Historic built environment resources or non-archaeological resources fall outside of the scope of the present study and will not be further addressed in this report.



## Review of Historical Topographical Maps and Aerial Photographs

Dudek consulted historical topographic maps and aerial photographs through the Nationwide Environmental Title Research, LLC (NETR) to better understand any natural or human-made changes to the proposed Project site and surrounding properties over time.

### Historical Topographic Maps

Topographic maps depict elevation of the study area as well as the areas surrounding it and illustrate the location of roads and some buildings. Although topographic maps are not comprehensive, they are another tool in determining whether a study area has been disturbed and at times to what approximate depth. A review of available topographic maps was conducted and includes the following years: 1903, 1908, 1913, 1924, 1928, 1929, 1932, 1937, 1944, 1947, 1954, 1959, 1966, 1968, 1977, 1980, 1986, 2012, 2015, and 2018 (NETR 2022a). Table 2 summarizes the results of the topographic map review of the proposed Project site and surrounding properties for all available years.

**Table 2. Historical Topographic Map Review**

Year	Description
1903	A northwest to southeast trending unimproved road is depicted immediately southwest of the proposed Project site and is unnamed.  The proposed Project site is mapped within the area labeled as San Fernando Valley.
1908 and 1913	There are no significant changes to the proposed Project site or immediate vicinity.
1924	The unimproved road immediately southwest of the proposed Project site is no longer depicted.  South and outside of the proposed Project site is an unnamed light duty road.
1928	Immediately bordering the proposed Project site to the south is an unnamed primary highway that is within the same footprint and route as the present-day Ventura Boulevard.  Immediately northwest of the proposed Project site is a depiction of what appears to be a small hill as evidenced by the topographic oval-shaped contour lines.  Immediately east of the proposed Project site, is a north to south trending unnamed intermittent stream.
1929	This map depicts what is captured in the 1924 map.
1932	This map depicts what is captured in the 1928 map; however, Ventura Boulevard is not depicted as a primary highway, but rather, as a light duty road.
1937	This map depicts what is captured in the 1924 map.
1944	The proposed Project site is shown to be within an orchard.  To the south and outside of the proposed Project site, south of present-day Ventura Boulevard, are subdivisions and development of a series of different types of roadways with few structures within them.
1947	This map depicts what is captured in the 1924 map.
1954	The proposed Project site is no longer depicted to be within an orchard; however, the areas immediately to the east remain as orchards.  The hill first depicted in the 1928 map is present.

**Table 2. Historical Topographic Map Review**

Year	Description
	<p>The intermittent stream is no longer depicted.</p> <p>The primary highway first observed 1928 to the south of the proposed Project site, along the route of present-day Ventura Boulevard, is depicted.</p> <p>Development to the south of this primary highway includes roadways and an increase in structures.</p>
1959 and 1966	There are no significant changes to the proposed Project site or immediate vicinity.
1968	<p>There is a roughly square-shaped building depicted within the central portion of the proposed Project site. This building is shown to be within the footprint of the present-day existing hotel.</p> <p>Light duty roads to the north and east of the proposed Project site, generally following the footprint of present-day Clarendon Street and Alhama Drive are depicted.</p> <p>The Ventura Freeway is depicted to the north of the proposed Project site.</p>
1977 and 1980	Files for these years are of aerial photographs and are not topographic maps of the proposed Project site and therefore, not summarized here.
1986	This map depicts what is shown in the 1968 map with the addition of the small hill to the northeast of the proposed Project site first depicted in the 1928 map.
2012	Beyond the roadways that border the proposed Project site to the north, east, and south, there are no structures depicted within the proposed Project site.
2015 and 2018	There are no significant changes to the proposed Project site or immediate vicinity.

While topographic maps are informative, they do not illustrate the minute changes that can occur to a landscape overtime and at times, are inconsistent with what is depicted year to year. Most often, structures depicted in topographical maps are limited to those with community or social significance (e.g. Firehouses or Hospitals), including additions or changes to roads and/or waterways. Nonetheless, the information gathered contributes to the understanding of the chronological development of a study area.

### Historical Aerial Photographs

A review of historical aerial photographs was conducted as part of the archival research effort from the following years: 1947, 1952, 1967, 1978, 1980, 1985, 1989, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020 (NETR 2022b). Through careful comparative review of historical aerials, changes to the landscape of a study area may be revealed. Disturbance to the study area is specifically important as it helps determine if soils within the study area are capable of sustaining intact archaeological deposits. Additionally, historical aerials have the potential to reveal whether a study area was subjected to alluvial deposits by way of flooding, debris flows or mudslides, as well as placement of artificial or foreign fill soils that may have buried intact archaeological deposits. Table 3, below, summarizes the results of the aerial photograph review of the proposed Project site and surrounding properties for all available years.

**Table 3. Historical Aerial Photograph Review of Proposed Project site**

Photograph Year	Observations and Findings
1947	<p>The proposed Project site is shown to be immediately west of a dense orchard.</p> <p>The proposed Project site is shown to consist of a sparse scatter of orchard trees.</p> <p>A paved road immediately south of the proposed Project site, following the footprint of present-day Ventura Boulevard is present.</p>
1952	<p>The proposed Project site, including the areas immediately north and west, are shown to have subjected to substantial ground disturbing activities. The ground surface appears to have been graded and all trees have been removed.</p>
1967	<p>The proposed Project site is shown to be completely developed with a large building within the center of the site, roadways bordering the site, paved parking lots, and an octagonal-shaped structure within the northeast quadrant. All development observed within this aerial are consistent with present-day site conditions.</p> <p>The areas immediately to the west and east of the proposed Project site remain undeveloped and vacant.</p>
1978	<p>No discernable changes to the Proposed project site.</p> <p>The areas immediately west and east of the proposed Project site are developed with buildings and paved parking lots.</p>
1980 - 2020	<p>No discernable changes to the Proposed project site</p>

**Geotechnical Report Review**

The geotechnical report, *Geotechnical Engineering Report, Proposed Self-Storage Facility, 21101 Ventura Boulevard, Woodland Hills, Los Angeles, California* (Leighton 2022), was prepared by Leighton Consulting, Inc. for the proposed Project site to assess subsurface conditions and the suitability of soils relative to the proposed Project improvements. The report details the results of recent subsurface exploratory investigations (completed in June 2022) and summarizes the results of two other geotechnical investigations previously conducted within the proposed Project site (completed in May 2017 and November 2019). A summary of the subsurface exploratory boring results is provided in Table 4 followed by a discussion of each geotechnical investigation addressing the proposed Project site and immediate vicinity as provided in the Leighton 2022 geotechnical report.

**Table 4. Summary of Subsurface Boring Results**

Boring & Year Completed	Asphalt Concrete/Base	Fill Soils	Native Soils	Bedrock
B-1 (2017)	0-6 inches bgs	6 inches to 5 feet bgs	5-10 feet bgs	10-50.6 feet bgs
B-2 (2017)	0-6 inches bgs	6 inches to 5 feet bgs	5-9.5 feet bgs	9.5-53.5 feet bgs
B-1 (2019)	—	0-8 feet bgs	8-64 feet bgs	64-67.5 feet bgs
B-2 (2019)	—	0-3.5 feet bgs	3.5-9.5 feet bgs	9.5-49.5 feet bgs
LB-1 (2022)	0-7 inches bgs	7 inches to 8.25 feet bgs	—	8.25-52 feet bgs
LB-2 (2022)	0-7 inches bgs	7 inches to 5 feet bgs	—	5-31.5 feet bgs
LB-3 (2022)	0-6 inches bgs	6 inches to 8 feet bgs	—	8-40.3 feet bgs

Geotechnologies Inc. (2017)

As summarized in the Leighton geotechnical report (2022) and captured in boring logs (see Leighton 2022, Appendix B), a subsurface exploratory investigation was completed by Geotechnologies Inc. in 2017. Based on a review of records associated with this investigation, two subsurface exploratory borings using an 8-inch-diameter hollow-stem auger (B-1 and B-2) were placed along the west-facing façade of the existing Courtyard Marriot Hotel, southwest and outside of the present proposed Project site footprint. Subsurface exploratory borings extended to a maximum depth ranging from 50.6 to 53.6 feet bgs. According to the boring logs for this investigation, the materials/soils encountered include: 1) Asphalt and base from surface to 6 inches; 2) Fills soils: characterized as silty sand to sandy silt, dark brown, moist, fine-grained at location B-1, and silty clay, dark and medium brown to gray, moist stiff at location B-2, and were identified underlying the asphalt and base to 5 feet bgs; 3) Alluvium (native soils): characterized as sandy lean clay, dark gray, moist, very stiff, fine sand and sandy to clayey silt, dark brown and gray mottling, moist stiff at location B-1, and sandy lean clay and clayey sand, ranging from dark to medium brown, gray, and olive brown, moist, varying stiffness at depth at location B-2, were identified underlying fill soils to between 9.5 and 10 feet bgs; 4) Modelo Formation (bedrock): characterized as siltstone, claystone, and clayey siltstone, ranging in colors to include light olive gray, brown to olive gray, orange mottling, and dark brown, moist, and fine-grained to cemented at depth, encountered underlying the alluvial soils to maximum depths explored.

Geocon West, Inc. (2020)

As summarized in the Leighton geotechnical report (2022) and captured in the boring logs (see Leighton 2022, Appendix B), a subsurface exploratory investigation was completed by Geocon West, Inc. in 2019. Based on a review of records associated with this investigation, two subsurface exploratory borings using a hollow-stem auger (B-1 and B-2) were placed at the northwest and northeast corners of the proposed Project site. Subsurface exploratory borings extended to a maximum depth ranging from 49.5 to 67.5 feet bgs. According to the boring logs for this investigation, the soils encountered include: 1) Artificial fills soils: characterized as sandy silt, soft, moist, dark brown, fine-grained, with some organic content, brown mottles and trace medium grained sand at location B-1, and sandy silt with clay, firm, slightly moist, dark brown with brown mottles, some organic material, trace fine gravel, fine- to medium-grained sand at location B-2, and were identified from surface to between 3.5 and 8 feet bgs; 2) Alluvium (native soils): generally characterized as sandy clay, firm, moist, brown, fine-grained,

trace medium-grained and fine-grained gravel, orange brown mottles, with changes in soil composition at depth, and were identified underlying artificial fill soils to depths between 9.5 and 64 feet bgs; 3) Modelo Formation (bedrock): characterized as sandstone, fine-grained, moderately hard, slightly moist, gray, fine-grained, poorly bedded at location B-1, and sandstone, grayish brown with reddish brown mottles, fine- to medium-grained, hard, completely weathered, with variation in composition at depth at location B-2, encountered underlying the alluvial soils to maximum depths explored.

### Leighton Consulting, Inc. (2022)

This geotechnical report details the results of the three most recent subsurface exploratory borings using an 8-inch-diameter hollow-stem auger (LB-1 through LB-3). These borings were placed at the northwest and northeast quadrants and one within the central area of the northern half portion of the proposed Project site. Subsurface exploratory borings extended to a maximum depth ranging from 31.5 to 52 feet bgs and were completed on June 30, 2022. According to the boring logs for this investigation, the materials/soils encountered include: 1) Asphalt concrete over subgrade, with fabric overlay from surface to between 6 and 7 inches; 2) Artificial fill, undocumented soils (Afu): varying in composition at depth and characterized as clayey sand, lean clay, and silty sand, and identified underlying the layer of asphalt concrete to depths between 5 and 8.25 feet bgs; 3) Quaternary Alluvium (Qa; native soils) at location LB-1: characterized as lean clay with trace sand and includes trace subrounded gravel and silt at depth, and identified underlying the artificial fill soil to 52 feet bgs; Tertiary Age Unnamed Shale (TUSH; bedrock) at locations LB-2 and LB-3: characterized as claystone varying in color, moisture content, stiffness and hardness at depth, encountered underlying artificial fill soils to maximum depths explored.

## Native American Coordination

### NAHC Sacred Lands File Search

Dudek requested a search of the SLF on December 19, 2022, to determine the presence of any Native American cultural resources within the proposed Project site. The NAHC maintains and reviews the SLF. Andrew Green, Cultural Resources Analyst, provided the SLF search results on January 6, 2023. The NAHC SLF records search results were positive for known Native American heritage resources within the proposed Project site. The NAHC identified 18 Native American individuals or Tribal entities who would potentially have specific knowledge as to whether or not other cultural resources are identified within the proposed Project site that could be at-risk; however, of note, only 17 of these NAHC-listed entities include contact information. To date, Dudek has not initiated contact with the individuals on the NAHC's contact list in regard to the proposed Project site. However, in compliance with AB 52 and SB 18, the City has contacted all NAHC-listed traditionally geographically affiliated tribal representatives that have requested project notification. AB 52 and SB 18 consultation efforts conducted by the City are discussed in the following sections. Documentation of the NAHC SLF search results is provided in Appendix C.

Note: Sacred Land Files maintained by the NAHC represent a curation of "sacred lands" or TCRs provided by Tribal entities and Native American representatives. For various reasons, Tribal entities and Native American representatives do not always report sacred lands or TCRs to the NAHC. As such, the NAHC's SLF is not a comprehensive list, and searches of the SLF must be considered in concert with other research and not used as a sole source of information regarding the presence of TCRs or cultural resources. Additionally, results of the SLF provided relate to the general regional area within and surrounding the proposed Project site and don't necessarily equate to the existence of resources within the specific area occupied by the proposed Project site.

## Assembly Bill 52 Consultation

The proposed Project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs 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 site. All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City. A summary of the consultation record is provided and addressed in the CEQA document for the proposed Project.

## Senate Bill 18 Consultation

The proposed Project is subject to compliance with SB 18 (Government Code Section 65352.3), which requires local governments to invite California Native American Tribal representatives to participate in consultation about proposed Specific Plan amendment. All records of correspondence related to SB 18 notification and any subsequent consultation are on file with the City. A summary of the consultation record is provided and addressed in the CEQA document for the proposed Project.

## 1938 Kirkman-Harriman Historical Map Review

Dudek cultural resources specialists reviewed sources commonly identified through Tribal consultation, notably the 1938 Kirkman-Harriman Historical Map (Image 2). Based on this map, the proposed Project site is situated within the San Fernando Valley, approximately 0.13 miles south of the Portolá<sup>1</sup> expedition trail from the year 1770, approximately 0.25 miles south of El Camino Real<sup>2</sup> (present-day U.S. Highway 101 or Ventura Freeway), and over 2 miles northeast of an “Ancient<sup>3</sup>” road labeled on the map as “Topanga Canyon, and nearly 2 miles south of a “Mission Road<sup>4</sup>”. There are no waterways within close proximity to the proposed Project site, however, there are a few in the general vicinity that traverse the landscape, originating from the Santa Susana Mountains and the Simi Hills from the north and west, respectively. These waterways converge at two points: the confluence of two intersecting unnamed waterways approximately 2 miles to the north, the closest of which, is over 1.5 miles to the northwest; and the confluence of waterways over 3 miles to the east that drain into the Los Angeles River’s historical route. The proposed Project site is mapped along the northern foothills of Santa Monica Mountains and nearly 3 miles southeast of the Simi Hills. Of note, there is one hill that is approximately 0.5 miles east/northeast of the proposed Project site; however, the penmanship on the map for the name of this hill is difficult to discern, but appears to read as follows: “Chal[?] Hills.” Well outside the proposed Project site footprint but within the general surrounding vicinity are five (5) Native American villages. The nearest mapped unnamed village is approximately 1.8 miles to the north; a second unnamed village is located over 3 miles to the west; and a third unnamed village is mapped nearly 4 miles to the northwest; a fourth unnamed village is mapped over 4 miles to the northeast; and the fifth unnamed village is mapped nearly 5 miles to the southeast.

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<sup>1</sup> Gaspar de Portolá y Rovira: Spanish military officer and first European to traverse Los Angeles County and led the expedition to establish missions and claim territory for Spain (Latker 2011). Expedition trail symbolized by red dashed lines on map.

<sup>2</sup> Official Spanish Road or the King’s Highway. Symbolized by double red lines on map.

<sup>3</sup> Few established before 1890. Symbolized by double black lines on map.

<sup>4</sup> Created highways, May 1851. Symbolized by double green lines on map.



**Image 1.** 1938 Kirkman-Harriman Historical Map (Proposed Project site depicted in green and pointed to by red arrow).



No archaeological evidence of the nearest village depicted on the 1938 Kirkman-Harriman map was identified by the records search of the CHRIS database or as a result of the literature review. This suggests that the village is either likely no nearer than 0.5-mile from the proposed Project site or if existent within the records search radius, subsurface deposits associated with the village have not yet been discovered.

It should be noted that 1938 Kirkman-Harriman map is highly generalized due to scale and age and may be somewhat imprecise with regards 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 Portolá expedition (circa 1769–1770). The map is a valuable representation of post-mission history; however, it is limited to a specific period of Native American history and substantiation of the specific location and uses of the represented individual features should be verified by archaeological records and/or other primary documentation.

## Field Survey

### Methods

Dudek Archaeological Technician, Connor Wilcox, conducted a pedestrian survey of the proposed Project site on November 4, 2022 under the direction of Project Archaeologist, Linda Kry and general supervision of Dudek Senior Archaeologist, Heather McDaniel McDevitt. Because the proposed Project site is within a developed setting with limited exposed sediment, a comprehensive archaeological survey was not conducted. Instead, a mixed approach (opportunistic survey) and reconnaissance survey (visual inspection) were utilized, selectively examining areas of exposed ground surfaces, which was limited to landscaped areas.

The entire parcel within AIN 2167-001-010 encompasses approximately 2.5 acres. Where exposed ground surface was present, it was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent burrows (if present), landscaped areas, and base of trees and bushes, were visually inspected for exposed subsurface materials. All field notes, photographs, and records related to the current study are on file at Dudek's Santa Barbara, California office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory.

## Results

At the time the survey was conducted, site conditions for the proposed Project consisted of existing development associated with the extant Courtyard Marriot Hotel building and associated structures, including a pool, paved parking lots and walkways, and landscape areas consisting of ornamental trees and bushes. Given these site conditions, ground surface visibility was variable. Exposed soils were limited to the landscape areas and accounted for approximately 30 percent of the proposed Project site. Ground surface visibility within the landscape areas were poor to fair (10 to 40 percent). In other developed areas, which accounted for approximately 70 percent include the paved parking lots and walkways and the existing pool, ground surface visibility was non-existent (0 percent). A modern brick pile was observed near the base of an orange tree by the northern boundary of the proposed Project site.

As previously mentioned in Geotechnical Report Review section, subsurface exploratory boring investigations encountered fill soils from surface to between 3.5 to 8.25 feet bgs within the proposed Project site. The presence of the fill soil is an indication that any potential cultural material between 3.5 to 8.25 feet bgs, has been previously displaced from the primary depositional location, buried, or destroyed. Additionally, the presence of fill soils demonstrates that the native soils upon and within which cultural deposits would exist in context was not observed during the survey. No cultural materials were observed within the proposed Project site; however, due to the presence of fill soils, observation of intact native soils was not possible.

## Sensitivity Analysis

### Archaeological Sensitivity

A search of the CHRIS database for the proposed Project site and 0.5-mile records search area did not identify any previously recorded historic-period or prehistoric archeological resources. In addition, CHRIS records search results identified 11 studies that were conducted within 0.5-mile of the proposed Project site; of these previous studies, three (3) overlap and two (2) are adjacent to the proposed Project site. As result, approximately 25 percent of the proposed Project site has been subjected to previous investigations; however, it should be noted that the areas surrounding the existing hotel within the proposed Project site have not been subjected to an archaeological investigation including a survey of exposed soils. Based on a review of historic topographic maps and photographic aerials, the proposed Project site has been subject to ground disturbance since at least 1944 when it served as an orchard and has been fully developed consistent with its current condition since at least 1967.



A review of a geotechnical report prepared for the proposed Project site determined that the subsurface conditions of the proposed Project site consist of asphalt concrete and base to approximately 7 inches bgs overlying fill soils from approximately 7 inches to between 3.5 and 8.25 feet bgs sloping from shallower fill soils in the southern portion and deeper fill soils in the northern portion of the proposed Project site. A pedestrian survey of the proposed Project site conducted in support of this study did not identify any presence of archaeological artifacts, features or materials that could potentially be evidence of archaeological deposits. However, due to the condition of the site at the time the fieldwork was conducted, including the presence of fill soils documented in the geotechnical report, the negative result of the archaeological survey is considered less than reliable and not definitive evidence for determination of the sensitivity for archaeological resources within the proposed Project site.

According to the geotechnical report, recommended depths of soils preparation, including removal of undocumented fill soils and removal of existing improvements (i.e. foundations and underground utilities), should occur between 5 to 8 feet below existing ground surface across the proposed Project site. Based on the results of this study, the potential to encounter intact cultural deposits containing archaeological resources within soils from current grade to between 3.5 feet and greatest depth of proposed ground disturbance (8 feet bgs) is unlikely. However, because native soils have not yet been observed by this or previous studies, the potential for intact cultural deposits to exist within native soils present between 3.5 feet and the greatest depth of proposed ground disturbance (8 feet bgs) is unknown. In the event that unanticipated archaeological resources were encountered during Project implementation, impacts to these resources have a potential to be significant. As such, the following management recommendations are provided to supplement the City's current standard conditions of approval (COA) and ensure that impacts to unanticipated archaeological resources and human remains would be less than significant.

## Management Recommendations

The following recommendations have been developed to ensure that any inadvertent discovery of archaeological resources will be treated appropriately and in accordance with CEQA regulations and the City of Los Angeles Stand Conditions for the inadvertent discovery of archaeological resources and human remains (outlined in local regulatory context section of this report). In concert with the City of Los Angeles' COAs for the preservation and protection of archaeological resources, Dudek recommends as a Project Design Feature (PDF), the following: preconstruction training, retention of an on-call archaeologist to address inadvertent discoveries, and inadvertent discovery clause implemented and included on all construction plans to both anticipate the presence of unknown archaeological and tribal cultural resources and to ensure proper treatment of any unknown archaeological and tribal cultural resources if they are inadvertently encountered as a result of Project construction. With proper implementation of the City prescribed COAs and Dudek's supplemental management considerations or PDFs, the potential impact to archaeological resources and human remains would be considered less than significant.

### Dudek Recommended PDFs for Inadvertent Discovery of Archaeological Resources and Human Remains

**Workers Environmental Awareness Program Training.** All construction personnel and monitors who are not trained archaeologists should be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet should be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP)

training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker should also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor. To ensure consistency of the training with the City's standard conditions, a cultural resource inadvertent discovery clause should be included on all construction plans, and a copy kept on the Project site throughout the duration of all construction tasks.

**Retention of a Qualified Archaeologist.** A qualified archaeologist should be retained and on-call to respond to and address any inadvertent discoveries identified for the duration of construction activities in accordance with CEQA and City requirements.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me directly at lkry@dudek.com or Heather McDaniel McDevitt at hmcdevitt@dudek.com.

Respectfully submitted,



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**Linda Kry, B.A., RA**  
Archaeologist



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**Heather McDaniel McDevitt, M.A., RPA**  
Archaeologist

Att.: *Appendix A – Figures*  
*Appendix B – (Confidential) SCCIC Records Search Information – Not for Public View*  
*Appendix C – NAHC SLF Search Results*  
cc: *Ronelle Candia and Clarisa Olaguez - Dudek*

## References

- Bonner, Wayne H. and Kathleen A. Crawford. 2013a. Report LA-12364: *Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate NLO502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California*. On File at the South Central Coast Information Center, California State University Fullerton. Accessed November 2022.
- Bonner, Wayne H. and Kathleen A. Crawford. 2013b. Report LA-12364A: *Direct APE Historic Architectural Assessment for AT&T Mobility, LLC Candidate NLO502, 21101 Ventura Boulevard, Woodland Hills, Los Angeles County, California*. On File at the South Central Coast Information Center, California State University Fullerton. Accessed November 2022.
- Duke, Curt. 2002. Report LA-06141: *Cultural Resource Assessment Cingular Wireless Facility No. Vy 156-01 Los Angeles, California*. On File at the South Central Coast Information Center, California State University Fullerton. Accessed November 2022.
- Laktker, Loren. 2011. Pictorial and Historical Map of Old Los Angeles County: Key to [Kirkman Harriman 1938 Historical] Map.
- Leighton (Leighton Consulting, Inc.). 2022. *Geotechnical Engineering Report, Proposed Self-Storage Facility, 21101 Ventura Boulevard, Woodland Hills, Los Angeles, California*. Prepared for Johnson Development Associates, Inc. El Segundo, California.
- NETR. 20212a. Historical Topographic maps of Proposed Project Site, dating from 1903, 1908, 1913, 1924, 1928, 1929, 1932, 1937, 1944, 1947, 1954, 1959, 1966, 1968, 1977, 1980, 1986, 2012, 2015, and 2018. Accessed November 2022. <https://www.historicaerials.com/viewer>.
- NETR. 20221b. Historical Aerial Photographs of Proposed Project Site, dating from 1947, 1952, 1967, 1978, 1980, 1985, 1989, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020. Accessed November 2022. <https://www.historicaerials.com/viewer>.
- Office of Historic Preservation. 1995. Instructions for Recording Historical Resources. Available online October 2021. Website: [http://ohp.parks.ca.gov/?page\\_id=1069](http://ohp.parks.ca.gov/?page_id=1069).
- Stelle, Kenneth and Albert Galiardo. 1982. Report LA-02409: *For Improvements of the Operational Characteristics of Route 101, the Ventura Freeway in Los Angeles and Ventura Counties, Between Route 405 in Los Angeles, and the Santa Clara River in Oxnard*. On File at the South Central Coast Information Center, California State University Fullerton. Accessed November 2022.
- Sylvia, Barbara. 2001. Report LA-10208: *Negative Archaeological Survey Report: Metal Beam Guardrail (MBGR) Along Sections of Route 101 From Route 134 to the Ventura County Line*. On File at the South Central Coast Information Center, California State University Fullerton. Accessed November 2022.
- USDA (U.S. Department of Agriculture). 2022a. Natural Resources Conservation Service Web Soil Survey. Accessed November 2022. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

TO: MR. BRIAN KEARNEY  
SUBJECT: ARCHAEOLOGICAL RESOURCES ASSESSMENT FOR THE JDA WOODLAND HILLS PROJECT, CITY OF  
LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

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USDA. 2022b. Natural Resources Conservation Service Official Soil Series Descriptions. Accessed November 2022. [https://soilseries.sc.egov.usda.gov/OSD\\_Docs/C/CROPLEY.html](https://soilseries.sc.egov.usda.gov/OSD_Docs/C/CROPLEY.html).

USGS (United States Geological Society). 2022. Mineral Resources Online Spatial Data. Interactive maps and downloadable data for regional and global analysis. Accessed November 2022. <https://mrdata.usgs.gov/geology/state/sgmc-unit.php?unit=CAQ;0>

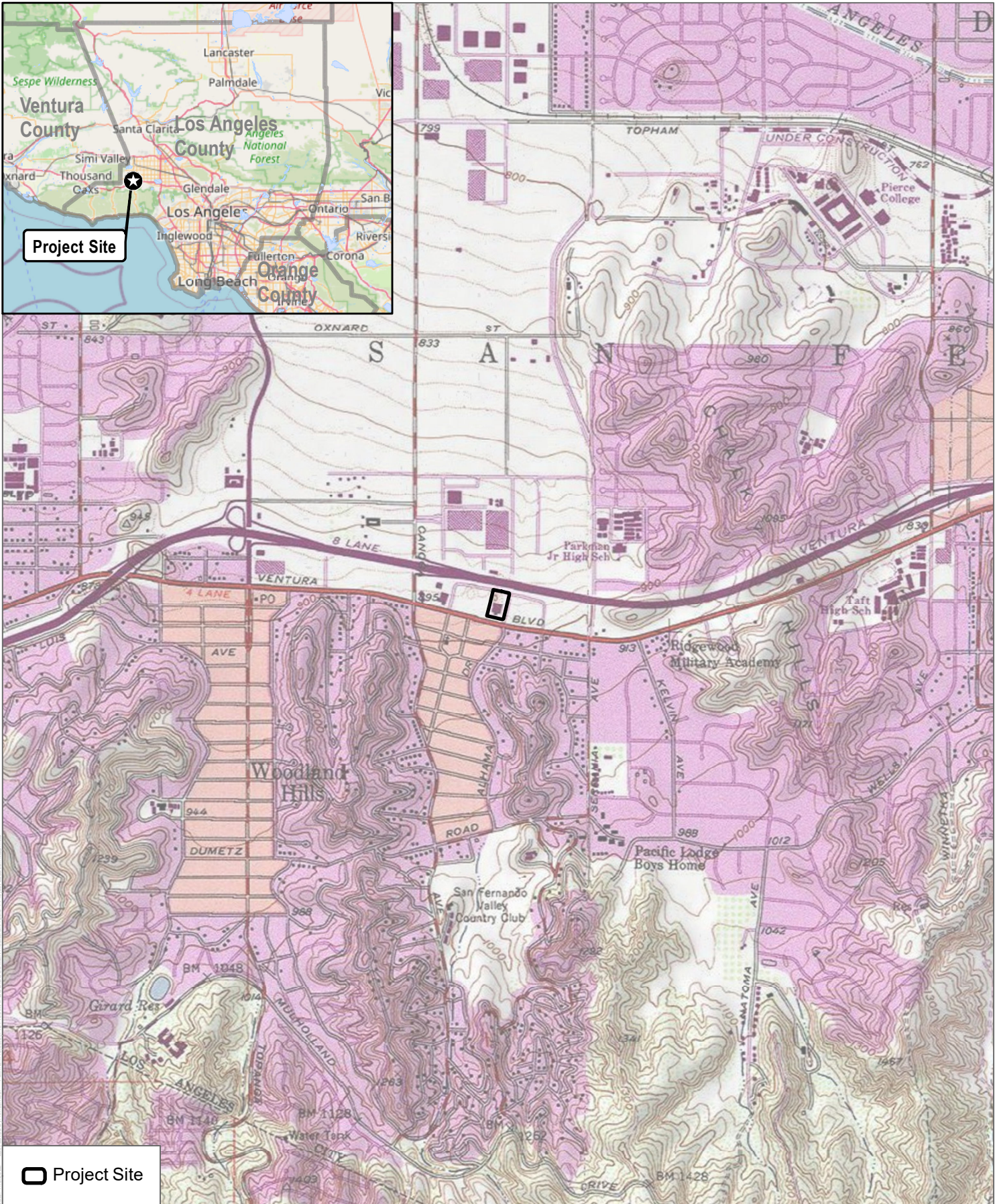
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# Appendix A

## Figures







SOURCE: USGS 7.5-Minute Series Canoga Park Quadrangle  
 Township 1N; Range 16W; Sections 18



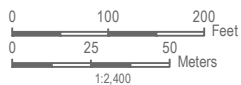
**FIGURE 1**  
**Project Location Map**  
 JDA Woodland Hills Project





SOURCE: Bings Maps (accessed 2022); Los Angeles County 2022

**DUDEK**



**FIGURE 2**

**Project Site Map**

JDA Woodland Hills Project



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## **Appendix B**

### **CONFIDENTIAL** SCCIC Records Search Information



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# **Appendix C**

## NAHC SLF Search Results



## NATIVE AMERICAN HERITAGE COMMISSION

January 6, 2023

Jennifer De Alba  
Dudek

Via Email to: [jdealba@dudek.com](mailto:jdealba@dudek.com)

**Re: 14914\_Woodland Hills Project, Los Angeles County**

Dear Ms. De Alba:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Fernandeno Tataviam Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

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

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

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

Sincerely,



Andrew Green  
Cultural Resources Analyst

Attachment



CHAIRPERSON  
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Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
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