TRIBAL CULTURAL RESOURCES ASSESSMENT FOR THE 3600 WILSHIRE BOULEVARD PROJECT, CITY OF LOS ANGELES, CALIFORNIA

September 2018

PREPARED FOR

3600 Wilshire, LLC 3470 Wilshire Boulevard Suite 700 Los Angeles, CA 90010

PREPARED BY

SWCA Environmental Consultants 51 West Dayton Street Pasadena, California 91105 This page intentionally left blank.

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3600 Wilshire, LLC 3470 Wilshire Boulevard Suite 700 Los Angeles, CA 90010

Prepared by

Chris Millington, M.A., RPA and Joanne Minerbi, B.S.

SWCA Environmental Consultants

51 West Dayton Street Pasadena, California 91105 (626) 240-0587 www.swca.com

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MANAGEMENT SUMMARY

Purpose and Scope: 3600 Wilshire, LLC (the Project Applicant), retained SWCA Environmental Consultants (SWCA) to conduct a tribal cultural resources review and sensitivity assessment in support of the proposed 3600 Wilshire Boulevard Project (Project) in the City of Los Angeles, Los Angeles County, California. The Project Applicant proposes to construct two high-rise, mixed-use commercial and residential buildings on a 3.9-acre property in the Koreatown neighborhood located at 3600 Wilshire Boulevard (Project area). The City of Los Angeles Department of City Planning (the City) is the Lead Agency for the Project. The following study was conducted to analyze any potential impacts this Project may have on tribal cultural resources located in the Project area for purposes of compliance with the California Environmental Quality Act (CEQA), including Assembly Bill 52 (AB 52) and relevant portions of Public Resources Code (PRC) Section 5024.1, Title 14 California Code of Regulations (CCR) Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The following report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to evaluate the presence or likelihood of tribal cultural resources within the Project area.

Dates of Investigation: SWCA conducted a CHRIS search for the Project area plus a 0.5-mile (0.8-km) radius on March 14, 2018, at the South Central Coastal Information System (SCCIC) located at California State University, Fullerton. CAJA Environmental Services received the results of a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on November 21, 2016. AB 52 notification letters were sent to 10 tribal groups on November 10, 2016.

Summary of Findings: The CHRIS records search did not identify any known tribal cultural resources within the Project area or a 0.5-mile (0.8-km) radius, and the NAHC search of the SLF did not identify any traditional lands or sites. The Native American village of Yaanga and Geveronga are the closest named villages documented in ethnographic accounts, estimated to have been located at least 6 km (3.7 miles) east of the Project area. The closest known permanent water source was the Los Angeles River, located approximately 6.9 km (4.3 miles) east of the Project area. No other evidence was found to suggest the Project area offered any consistent or seasonal sources of water or other natural resources that would increase the likelihood of the presence of a temporary Native American camp. Other notable resource areas of known significance to Native American groups include the asphaltum source at the present-day La Brea Tar Pits 4.8 km (3.0 miles) west of the Project area, and a wetland environment referred to by the Spanish as Las Cienegas, formed at the confluence of Los Angeles River tributaries 6.6 km (4.1 miles) to the southwest.

The entire Project area was initially developed in the first decade of the nineteenth century as a residential tract that had expanded to fill the entire city block by the 1920s. In the late 1950s the tract was razed for the construction of the Travelers Insurance Company Building and parking lot. The parking lot extends at least 1.5 m (5 feet) below the current sidewalk grade. A geotechnical bore identified alluvial sediments (i.e., sediments deposited by water) that extend at least 21.3 m (70 feet) below the paved surface, beyond the area disturbed by the parking lot. Because the demolition of the former residences and construction of the parking lot required excavation within the entirety of the Project area, the depth and extent of the disturbances substantially reduces the preservation potential for unknown tribal cultural resources within the alluvium. Because of these factors, SWCA finds the Project area has a low sensitivity for containing unknown tribal cultural resources.

Conclusion: No previously recorded tribal cultural resources were identified within the Project area. The City submitted notification letters to the tribal parties listed on the City's AB 52 notification list. The City received one response requesting consultation from the Gabrieleño Band of Mission Indians–Kizh Nation. A telephone consultation occurred on July 02, 2018 and was attended by the City and the Tribe. Evidence

was then submitted by Tribe to support their claim for the presence of a tribal cultural resource within the Project area. The City carefully considered the evidence in support of their claim that this project has the potential to impact tribal cultural resources, and the Tribe's request for the City to require its proposed mitigation measures to mitigate those potential impacts. The City has concluded that there is no substantial evidence to support a determination that this project could reasonably foreseeably impact tribal cultural resources. Thus, after acting in good faith and after reasonable effort, the City was unable to reach an agreement with the Gabrieleño Band of Mission Indians-Kizh Nation. The City's findings will be submitted in a memo to the Tribe.

SWCA finds that the Project would have no impacts to known tribal cultural resources. The Project area was further assessed for the potential to contain deeply buried, previously unidentified tribal cultural resources and was found to be low. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, the Project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Based on the condition of approval, any potential impacts would be reduced to less than significant. Therefore, SWCA finds that the Project will have less-than-significant impacts to tribal cultural resources.

Disposition of Data: The final report and any subsequent related reports will be submitted to the Project Applicant, the City of Los Angeles Department of City Planning, and the SCCIC at California State University, Fullerton. Research materials and the report are also on file at the SWCA Pasadena Office.

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INTRODUCTION

3600 Wilshire, LLC (the Project Applicant), retained SWCA Environmental Consultants (SWCA) to conduct a tribal cultural resources review and sensitivity assessment in support of the proposed 3600 Wilshire Boulevard Project (Project) in the City of Los Angeles, Los Angeles County, California. The Project Applicant proposes to construct two high-rise, mixed-use commercial and residential buildings on a 3.9-acre property in the Koreatown neighborhood located at 3600 Wilshire Boulevard (Project area). The City of Los Angeles Department of City Planning (the City) is the Lead Agency for the Project. The following study was conducted to analyze any potential impacts this Project may have on tribal cultural resources located in the Project area for purposes of compliance with the California Environmental Quality Act (CEQA), including Assembly Bill 52 (AB 52) and relevant portions of Public Resources Code (PRC) Section 5024.1, Title 14 California Code of Regulations (CCR) Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1 (Governor's Office of Planning and Research 1998). The following report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to evaluate the presence or likelihood of tribal cultural resources within the Project area.

SWCA Cultural Resources Project Manager Chris Millington, M.A., Registered Professional Archaeologist (RPA), conducted background research, authored the report, and prepared the figures. SWCA Archaeologist Joanne Minerbi, B.S., conducted background research and co-authored sections of the report. Cultural Resources Principal Investigator Heather Gibson, Ph.D., RPA, reviewed the report for quality assurance/quality control. All figures in the report are included in Appendix A. Copies of the report are on file with SWCA's Pasadena Office, City Planning, and the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

PROJECT DESCRIPTION

The Project Applicant proposes to construct two levels of subterranean parking and four levels of abovegrade parking with two 23-story towers built atop the parking structure, providing 760 residential units and approximately 6,359 square feet of commercial space. The Project area is in the Koreatown neighborhood of Los Angeles on a 3.9-acre, rectangular-shaped parcel (Assessor's Parcel Number [APN] 5093-02-0001) developed as part of the Wilshire Harvard Heights Tract (Figure 1–Figure 3). Specifically, the Project area is located at 3600 Wilshire Boulevard, including the entire block bound by Wilshire Boulevard to the north, Kingsley Drive to the east, 7th Street to the south, and Harvard Boulevard to the west. The Project area is currently occupied by a 22-story commercial building fronting on Wilshire Boulevard and a two-level parking structure to the rear (south) of the building. The Project Applicant proposes to demolish the existing parking structure; the existing commercial building will remain. Though the Project area is defined as the entire 3.9-acre parcel; excavation related to the demolition of the existing parking structure and new construction is only proposed in the lots south of the existing commercial building. This location is plotted in an unsectioned portion of Township 1 South, Range 13 West as depicted on the U.S. Geological Survey (USGS) Hollywood, California, 7.5-minute topographic quadrangle.

REGULATORY SETTING

State Regulations

The California Office of Historic Preservation (OHP), a division of the California Department of Parks and Recreation (DPR), is responsible for carrying out the duties described in the California PRC and maintaining the California Historic Resources Inventory and CRHR. The state-level regulatory framework also includes CEQA, which requires the identification and mitigation of substantial adverse impacts that may affect the significance of tribal cultural resources.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether tribal cultural resources may be adversely affected by a proposed project. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment" (PRC Section 21084.1). Answering this question is a two-part process: first, the determination must be made whether the proposed project involves cultural resources. Second, if cultural resources are present, the proposed project must be analyzed for a potential "substantial adverse change in the significance" of the resource.

TRIBAL CULTURAL RESOURCES

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

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

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects 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 Native American Heritage Commission (NAHC), whether or not they are federally recognized. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency makes a decision to undertake a project, the lead agency has 14 days to send formal notification formally notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given Project area and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location,

contract information for the agency contact, and notice that the tribe has 30 days to request, in writing, consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe's request for consultation. Furthermore, consultation must be initiated prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

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

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant or the applicant's public 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 CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the 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.

Treatment of Human Remains

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code (CHSC) Section 7050.5. More specifically, remains suspected to be Native American are treated under CEQA at CCR Section 15064.5; PRC Section 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:

• Stop immediately and contact the County Coroner:

1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 am to 5 pm 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 descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

Local Regulations

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 City of Los Angeles Planning Department, OHR. An HCM, monument, or local landmark is defined in the Cultural Heritage Ordinance as follows:

[A] Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age (Municipal Code Section 22.171.7).

Condition of Approval

The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the proposed project, they will be handled in compliance with state law so that any potential impacts would be reduced to less-than-significant levels.

Inadvertent Discovery of Tribal Cultural Resources: If objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, 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 project permittee 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) 978-1454.
- If the City determines, pursuant to PRC Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the project permittee 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 project permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The project permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the project permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project permittee may request mediation by a mediator agreed to by the permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project permittee shall pay any costs associated with the mediation.
- The project permittee 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 or 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 SCCIC at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the public under the applicable provisions of the California Public Records Act, California PRC, and shall comply with the City's AB 52 Confidentiality Protocols.

METHODS

The following section presents an overview of the methodology used to identify the potential for tribal cultural resources within the Project area.

CHRIS Records Search

SWCA conducted a CHRIS records search at the SCCIC on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.8-km (0.5-mile) radius of the Project area, as well as any selectively chosen outside the radius to aid in the assessment of tribal cultural resource sensitivity. The SCCIC maintains records of previously documented archaeological resources (including those that meet the definition of a tribal cultural resource) and technical studies; it also maintains copies of the OHP's portion of the Historic Resources Inventory. This work supplements a

previous non-confidential records search conducted by CAJA Environmental Services on December 12, 2016 (SCCIC File No. 17073.3171), which is presented here as Appendix A.

On March 14, 2018, SWCA conducted a confidential search of the CHRIS records at the SCCIC. Confidential CHRIS results include specific information on the nature and location of sensitive archaeological sites, which should not be disclosed to the public or unauthorized persons and are exempt from the Freedom of Information Act. The information included in a confidential CHRIS records search is needed to assess the sensitivity for undocumented tribal cultural resources and inform the impact analysis. The search included any previously recorded archaeological resources (i.e., excludes historic buildings) within the Project area and surrounding 0.8-km (0.5-mile) area.

Archival Research

Concurrent with the confidential CHRIS records search, SWCA also reviewed property-specific historical and ethnographic context research to identify information relevant to the Project area. Research focused on a variety of primary and secondary materials relating to the history and development of the Project area, including historical maps, aerial and ground photographs, ethnographic reports, and other environmental data. Historical maps drawn to scale were georeferenced using ESRI ArcMAP v10.5 to show precise relationships to the Project area. Sources consulted included the following publicly accessible data sources:

- City of Los Angeles OHR (SurveyLA);
- City of Los Angeles Department of Building and Safety (building permits);
- David Rumsey Historical Map Collection;
- Huntington Library Digital Archives;
- Library of Congress;
- Los Angeles Public Library Map Collection;
- Sanborn Fire Insurance Company Maps (Sanborn maps);
- USGS historical topographic maps;
- University of California, Santa Barbara Digital Library (aerial photographs); and
- University of Southern California Digital Library.

In addition to the above, SWCA reviewed the geotechnical report prepared for the Project by Geotechnologies (2016) and the environmental site assessment (ESA) report prepared by CBRE, Inc. (2016). Geotechnologies, Inc. conducted limited subsurface boring, identified the earth materials underlying the Project area, noted their properties, and offered a preliminary discussion of geotechnical aspects of the Project as it was proposed in 2016. CBRE surveyed the Project area, surrounding roads, and accessible adjacent properties to assess natural features, surrounding site uses, or potential environmental conditions (CBRE 2016:4). CBRE also reviewed historical site documentation and maps, environmental reports, and information databases.

Sensitivity Assessment

When a known tribal cultural resource is not present, the potential for an unknown resource to be present is assessed, primarily those in the form of an archaeological site affiliated with Native Americans. That determination considers historical use of the Project vicinity, broadly, and the physical setting, specifically, including an assessment of whether the setting is capable of containing buried resources (preservation potential). Lacking any data specifically gathered to assess the presence or absence of such resources below the surface, the resulting sensitivity is by nature qualitative, ranging along a spectrum of increasing probability for encountering tribal cultural resources, designated here as low, moderate, and high. The resulting sensitivity is then factored into the assessment of impact under CEQA.

SWCA assessed the sensitivity of the Project area to contain unknown tribal cultural resources. For areas that show some evidence of activity or a likelihood based on proximity to known sites and natural features (e.g., perennial water, flat terrain, plant or mineral resources), and retain sediments dated to the approximate time period of that activity, the resulting sensitivity assessment is increased above low background levels. Disturbances to the physical integrity of the Project area are then considered. Disturbances can occur through natural processes (e.g., erosion, animal burrowing) and/or human activity (e.g., mechanical excavation, road or building construction), and influence the potential for preservation (or not) of any archaeological materials that may have once been present. The intensity of the disturbances as well as the vertical depth and horizontal extent are considered based on any available data describing the soils, geomorphology, and historical developments to the Project area. It is possible for intact resources to be preserved below disturbances, though in general the greater the intensity and spatial extent of disturbances, the greater the reduction in sensitivity.

ENVIRONMENTAL SETTING

The Project area 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 deposited as unconsolidated material eroded from the surrounding hills. Several major watercourses drain the Los Angeles Basin, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana rivers. The south-flowing Los Angeles River is currently located approximately 6.9 km (4.3 miles) east of the Project area, though historically the channel has shifted courses several times during flood events (Figure 4). 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 North Spring Street. That flood destroyed structures built as part of the original Los Angeles Pueblo and is presumed to have also destroyed portions of a Native American village site (Yaanga) also located nearby (Gumprecht 2001:139-141). At that time and before 1825, the river flowed west within the Los Angeles Basin, discharging into the Ballona Wetlands along what is now Ballona Creek, near Santa Monica. Flooding in 1825 produced the most dramatic shift historically observed in the river's course as the newly formed channel overflowed its banks and shifted its course fully south near the rebuilt Los Angeles Pueblo, now emptying into the bay near San Pedro. Subsequent shifts occurred along the braided streams within the broader, south-flowing floodplain. Flood events such as these have produced massive deposits of alluvial sediments within the respective floodplains. Alluvial terraces formed where flooding water eroded into adjacent hillsides. In the downtown Los Angeles area, the backslopes in the location of Bunker Hill delineate the edge of the historical floodplain.

An 1894 topographic map shows that before urbanization, the Project area was situated on a relatively level alluvial plain southwest of the hills around Elysian Park. Two higher order (i.e., smaller) streams are plotted east and west of the Project area and are part of several tributaries flowing southwest into Ballona Creek—formerly the Los Angeles River—that would have seasonally drained water from the surrounding hills. Before the last decades of the nineteenth century the Project area and surrounding parts of the alluvial plain were used for ranching, followed by extensive residential and commercial development during the late nineteenth and early twentieth centuries.

One geotechnical bore was taken in the southwest portion of the Project area and extended 21.3 m (70 feet) below the concrete surface. The initial 0.9 m (3.0 feet) of the bore was described as fill composed of sandy to clayey silt. Natural alluvial sediments composed the remainder of the sample and may extend as

deep as 45.7 m (150 feet) below the surface (Geotechnologies 2016:4–5). The alluvium includes varying compositions of sandy and clayey silt and sands (Geotechnologies 2016:2). These alluvial deposits are consistent with depositional trends for the Los Angeles basin.

CULTURAL SETTING

Prehistory

Prehistoric Overview

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

HORIZON I: EARLY MAN (CA. 10,000-6,000 BC)

The earliest accepted dates for archaeological sites on the southern California coast are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area approximately 10,000 years ago (Erlandson 1991:105). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002). Present-day Orange and San Diego counties contain several sites dating from 9,000 to 10,000 years ago (Byrd and Raab 2007:219; Macko 1998:41; Mason and Peterson 1994:55–57; Sawyer and Koerper 2006). Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin (e.g., "Los Angeles Man," "La Brea Woman," and the Haverty skeletons) apparently date to the Middle Holocene, if not earlier (Brooks et al. 1990; Erlandson et al. 2007:54).

Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (e.g., Jones et al. 2002), and a greater emphasis on large-game hunting inland.

HORIZON II: MILLING STONE (6,000-3,000 BC)

Set during a drier climatic regime than the previous horizon, the Milling Stone horizon is characterized by subsistence strategies centered on collecting plant foods and small animals. The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos). Recent research indicates that Milling Stone horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (Byrd and Raab 2007:220).

HORIZON III: INTERMEDIATE (3,000 BC-AD 500)

The Intermediate horizon is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this horizon along the California coast. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks became part of the toolkit during this period. Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment and signaling a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn (e.g., Glassow et al. 1988; True 1993).

HORIZON IV: LATE PREHISTORIC (AD 500-HISTORIC CONTACT)

In the Late Prehistoric horizon, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric horizon, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely chipped projectile points suggests increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Steatite cooking vessels and containers are also present in sites from this time, and there is an increased presence of smaller bone and shell circular fishhooks; perforated stones; arrow shaft straighteners made of steatite; a variety of bone tools; and personal ornaments such as beads made from shell, bone, and stone. There was also an increased use of asphalt for waterproofing and as an adhesive. Late Prehistoric burial practices are discussed in the Ethnographic Overview section below.

By AD 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that occupants were trading with neighboring groups to the south and east for ceramics. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that functioned in the same capacity as ceramic vessels.

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

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

Ethnographic Overview

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

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

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

The Gabrielino/Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the Early Intermediate period). 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/Tongva 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/Tongva people processed food with a variety of tools, including hammer stones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925:629; McCawley 1996:129–138).

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

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

mourning ceremony that included a variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (Dakin 1978:234–365; Johnston 1962:52–54; McCawley 1996:155–165).

Yaanga and other Native American Communities in Los Angeles

The Project area is situated within traditional Gabrielino/Tongva territory (King 2004; McCawley 1996:36-40). The closest ethnographically documented village to the Project area is Yaanga (alternative spellings and names include Yang-na, Yangna, and Yabit). Though the actual location is disputed, generally Yaanga is believed to have been located near present-day Union Station, approximately 6 km (3.7 miles) east of the Project area (McCawley 1996:57; Figure 5 and Figure 6). In general, it has proven very difficult or impossible to establish definitively the precise location of Native American villages occupied in the Ethnohistoric period (McCawley 1996:31-32). Native American place names referred to at the time of Spanish contact did not necessarily represent a continually occupied settlement within a discrete location. Instead, in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features subject to change over generations (see Johnston 1962:122). Many of the villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point the former village sites were affected by urban and agricultural development, and Native American lifeways had been irrevocably changed. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference, further confound efforts at relocation. McCawley quotes Kroeber (1925:616) in his remarks on the subject, writing that "the opportunity to prepare a true map of village locations 'passed away 50 years ago'" (McCawley 1996:32). Thus, even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Historical records place Yaanga near Los Angeles's original plaza, located near present-day Union Station. 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 (1992) 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 Yaangna, its location can only be inferred from ethnographic information (McCawley 1996:57).

Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence for 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" during the rebuilding of the Bella Union Hotel in 1970 (on the 300 block of North Main Street, two blocks northeast from the Project area; Johnston 1962:121; Robinson 1979:12). The preponderance of the available evidence indicates that there were one or more early historic 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 (1.3 and 1.5 miles) west-southwest from the Los Angeles River on high-level ground. The Pueblo of Los Angeles has been documented as being founded directly adjacent to this village. Long-time Los Angeles resident Narciso Botello and Gabrielino

consultant José María Zalvidea have also discussed the location of Yaanga, indicating that it was originally 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 Main Street and 1st Street (Morris et al. 2016:96–97).

Although the precise location of any given village is subject to much speculation, it is clear the banks of the Los Angeles River were home to many Gabrielino/Tongva villages throughout the greater Los Angeles area, and several maps were produced throughout the twentieth century depicting this settlement pattern. This pattern of settlements concentrated along the Los Angeles River appears in Johnston (1962; Figure 6), as well as Gumprecht (2001:21; Figure 7) and George Kirkman's (1938) map of historical sites ca. 1860–1937 (Figure 8). These maps convey a general sense of significant historical areas based on the geographic information available at the time and are considered as a representational depiction of these locations rather than explicit geographic points.

History

Post-contact history for the state of California is generally divided into three periods: the Spanish period (1769–1822), Mexican period (1822–1848), and American period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American period, when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan Rodríquez Cabríllo stopped in 1542 at present-day San Diego Bay. With his crew, Cabríllo explored the shorelines of present Catalina Island as well as San Pedro and Santa Monica bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno's crew also landed on Santa Catalina Island and at San Pedro and Santa Monica bays, giving each location its long-standing name. The Spanish crown laid claim to California based on the surveys conducted by Cabríllo and Vizcaíno (Bancroft 1886:96–99; Gumprecht 2001:35).

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

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father Juan Crespí, a member of the expedition, named the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula or "Our Lady the Queen of the Angeles of the Porciúncula." Two years later, Fr. Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Engelhardt 1927). In 1781, a group of 11 Mexican families traveled from Mission San Gabriel Arcángel to establish a new pueblo called El Pueblo de la Reyna de Los Angeles ("the Pueblo of the Queen of the Angels"). This settlement consisted of a small group of adobe-brick houses and streets and would eventually be known as the Ciudad de Los Angeles ("City of Angels").

Mexican Period (1822–1848)

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

Extensive land grants were established in the interior during the Mexican period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos.

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

American Period (1848–Present)

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

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848; with the influx of people seeking gold, cattle were no longer desired mainly for their hides, but also as a source of meat and other goods. During the

1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941).

On April 4, 1850, only two years after the Mexican–American War and five months prior to California's achieving statehood, Los Angeles was officially incorporated as an American city. Settlement of the Los Angeles region continued steadily throughout the Early American period. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's acquiring official statehood in the United States. At that time, the city was bordered on the north by the Los Felis and the San Rafael Land Grants and on the south by the San Antonio Luge-Land Grant. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

Ranching retained its importance through the mid-nineteenth century, and by the late 1860s, Los Angeles was one of the top dairy production centers in the country (Rolle 2003). By 1876, the county had a population of 30,000 (Dumke 1944:7). Los Angeles maintained its role as a regional business center, and the development of citriculture in the late 1800s and early 1900s further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the impact of the real estate boom of the 1880s on Los Angeles (Caughey and Caughey 1977; Dumke 1944). By the late 1800s, government leaders recognized the need for water to sustain the growing population in the Los Angeles area. Irish immigrant William Mulholland personified the city's efforts for a stable water supply (Dumke 1944; Nadeau 1997). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile aqueduct that brought the valley's water to the city (Nadeau 1997).

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

Los Angeles: From Pueblo to City

On September 4, 1781, 44 settlers from Sonora, Mexico, accompanied by the governor, soldiers, mission priests, and several Native Americans, arrived at a site along the Rio de Porciúncula (later renamed the Los Angeles River), which was officially declared El Pueblo de Nuestra Señora de los Angeles de Porciúncula, or the Town of Our Lady of the Angels of Porciúncula (Robinson 1979:238; Ríos-Bustamante 1992; Weber 1980). The site chosen for the new pueblo was elevated on a broad terrace 0.8 km (0.5 mile) west of the river (Gumprecht 2001). By 1786, the area's abundant resources allowed the pueblo to attain self-sufficiency, and funding by the Spanish government ceased.

Efforts to develop ecclesiastical property in the pueblo began as early as 1784 with the construction of a small chapel northwest of the plaza. Though little is known about this building, it was located at the pueblo's original central square near the corner of present-day Cesar Chavez Avenue and North

Broadway (Newcomb 1980:67–68; Owen 1960:7). Following continued flooding, however, the pueblo was relocated to its current location on higher ground, and the new town plaza soon emerged.

Alta California became a state in 1821, and the town slowly grew as the removal of economic restrictions attracted settlers to Los Angeles. The population continued to expand throughout the Mexican period and on April 4, 1850, only 2 years after the Mexican–American War and 5 months prior to California earning statehood, the City of Los Angeles was formally incorporated. Los Angeles maintained its role as a regional business center in the early American period and the transition of many former rancho lands to agriculture, as well as the development of citriculture in the late 1800s, further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the real estate boom of the 1880s in Los Angeles (Caughey and Caughey 1977; Dumke 1944).

Newcomers poured into the city, nearly doubling the population between 1870 and 1880, resulting in an increased demand for public transportation options. As the city neared the end of the nineteenth century, numerous privately owned passenger rail lines were in place. Though early lines were horse and mule drawn, they were soon replaced by cable cars in the early 1880s and by electric cars in the late 1880s and early 1890s. Many of these early lines were subsequently consolidated into Henry E. Huntington's Los Angeles Railway Company (LARy) in 1898, which reconstructed and expanded the system into the twentieth century and became the main streetcar system for central Los Angeles, identified by their iconic "yellow cars" (Electric Railway Historical Association of Southern California [ERHA] 2013). During this period, Huntington also developed the much larger Pacific Electric system (also known as the "red cars") to serve the greater Los Angeles area. Just as the horse-and-buggy street cars were replaced by electric cars along the same routes, gas-powered buses (coaches) eventually served former yellow car routes. Both the Red Cars and LARy served Los Angeles until they were eventually discontinued in the early 1960s (ERHA 2013).

Los Angeles continued to grow outward from the city core in the twentieth century in part due to the discovery of oil and its strategic location as a wartime port. The military presence led to the growth in the aviation and eventually aerospace industries in the city and region. Hollywood became the entertainment capital of the world through the presence of the film and television industries and continues to tenuously maintain that position. With nearly 4 million residents, Los Angeles is the second largest city in the United States (by population), and it remains a city with worldwide influence that continues to struggle with its population's growth and needs.

Historical Development of the Project Area

Once situated amid barley and wheat fields, in the late 1800s the Project area was on the margin of the great expanse beyond the western city limits of Los Angeles. Between the city boundary and the Pacific Ocean there were very few historical landmarks to break up the expanse of agricultural fields and grazing lands during the nineteenth century. In his memoir, merchant Harris Newmark describes the surroundings in 1854 as "one huge field, practically unimproved and undeveloped" extending from Spring Street to the coast (Newmark 1930:112). During the earlier division of Spanish holdings into land grants, a vast public space separated the La Brea and Las Cienegas Ranchos to the west and the City of Los Angeles to the east (Figure 9–Figure 11). The City annexed the portion of this land that includes the Project area as the Western Addition in 1896.

In the mid- to late nineteenth century the roads extending west from the more developed portions of the city were infamous for their ruggedness. An improved road (eventually named Wilshire Boulevard) was one of many developments included in Henry Gaylord Wilshire and his brother William's residential tract established in between Westlake Park (now MacArthur Park) and Lafayette Park. Henry had acquired

land on the western edge of the city during the 1880s real estate boom and in 1895 he and his brother converted a 35-acre barley field into a subdivided housing tract of distinguished single-family homes for Los Angeles's wealthy elite (Roderick and Lynxwiler 2005). After the 1896 annexation of the Western Addition, the city limit had expanded west to Vermont Avenue and road alignments were shifted to accommodate the modern urban grid oriented to the cardinal directions (Figure 12). The Wilshire Boulevard tract was successfully established as an elite residential community and its success led to additional land purchases in adjacent lots to the west and additional speculation and developments with more mansions and large residences with rich stylistic variations, including those in the Project area (Wuellner et al. 2009).

The Wilshire District became a desirable suburb and experienced protracted development between the late 1910s to late 1920s, especially in the Project area (Architectural Resources Group, Inc. [ARG] 2015). Lots within the Project area were developed as part of the Wilshire Harvard Heights subdivision. A 1908 newspaper article describes the sale of homes being constructed along Harvard Boulevard being sold for \$2050 (*Los Angeles Herald* 1908). Growth was spurred by improvements in transportation, such as the streetcar system for commuters. The *Los Angeles Times* described the pace of development in the area:

In eight years the barley fields have disappeared. Nearly all the land west of Westlake Park in the city limits has been subdivided into tracts. Without exception these tracts have high-class street and other improvements and building restrictions (*Los Angeles Times* 1914).

Among these building restrictions were racial housing covenants, which were only declared unconstitutional in 1948. Up until that point, demographics of the Wilshire District remained limited to wealthy whites, many of which shifted their residence from areas further east (ARG 2015). The mid-twentieth century saw many changes within the Project area and Los Angeles as a whole. As automobile sales grew and Los Angeles's public transportation system declined, much of the city's wealthy clientele moved away from the city center. The Project area and surrounding blocks remained a bustling locale for restaurants, stores, and department stores throughout the 1950s.

Around 1970 local demography made a major shift. Although a small population of Koreans resided in the Wilshire District between the 1910s and 1930s, a wave of Korean immigrants came to the area in the 1970s and 1980s, not long after immigration quotas based on place of birth lifted with the Immigration Act of 1965. Korean and Latino Americans started commercial enterprises in existing buildings near the corner of Olympic Boulevard and 8th Street (ARG 2015). Today many retail establishments occupy strip malls, and Koreatown's population density is the highest for any neighborhood in Los Angeles County (*Los Angeles Times* 2018a). Currently, Latino Americans make up the largest ethnic group in Koreatown (53.5%), followed by Asian Americans (32.2%; *Los Angeles Times* 2018b).

RESULTS CHRIS Records Search

Previously Conducted Studies

Results of the records search at the SCCIC indicate that 37 cultural resource studies have been conducted within 0.8 km (0.5 mile) of the Project area. Of these, 13 explicitly address archaeological resources, whereas 14 are focused on historic architecture, six were conducted as a literature search, and four are management or planning reports. None of the studies were conducted specifically within the Project area. A full list of the 37 cultural resource studies identified in the CHRIS search is included in Appendix B.

Previously Recorded Cultural Resources

The CHRIS records search identified a total of 23 previously documented cultural resources within a 0.8km (0.5-mile) radius of the Project area, all of which are historic buildings and do not contain archaeological components. None of these are considered to be tribal cultural resources. The Travelers Insurance Company Building (P-19-192460) is located in the Project area. The building was recommended eligible for listing in the NRHP under Criteria A and C, in the CRHR under Criteria 1 and 3, and as a HCM related to history and architecture as the notable work of a master architect (Brown 2017).

Archival Research

SWCA's archival research included a review of historical maps for the Project area 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. One important landmark was the brea ("tar") pits, now known as the La Brea Tar Pits, located 4.8 km (3.0 miles) west of the Project area. Asphaltum-the naturally formed substance found in seeps-provided an important resource to Native American populations, who used it as a binding and waterproofing element. The asphaltum at the La Brea Tar Pits would have been accessed via footpaths from neighboring camp and village sites, including Yaanga and Geveronga, located east of the Project area. Though no reliable maps exist showing the location of such Native American travel routes, it is likely that many of the routes designated by the Spanish, Mexican, and American inhabitants followed some of the same alignments. The Kirkman-Harriman map (Kirkman 1938) illustrates this pattern of historically significant points connected by travel corridors composed of superimposed paths from multiple time periods. In the vicinity of the Project area, Kirkman's map depicts a number of pathways including "Camino Real" to the north-the road connecting the nearby Spanish missions and Los Angeles Pueblo-and two parallel east-west routes to the south for the Portolá Expedition and "La Brea Road" (Kirkman 1938). As plotted, the three routes are more than 1.2 km (0.75 mile) from the Project area.

Review of Sanborn Fire Insurance maps (Figure 13–Figure 16), newspaper articles, and building permits document the development of the Project area as a residential block within the Wilshire Harvard Heights Tract and the conversion to its current use as a high-rise commercial building and parking lot. The first Sanborn Fire Insurance maps showing the Project area were published in 1921 and show 17 of the 23 lots composing the block improved with houses and separated garages. The unoccupied lots were the five fronting Wilshire Boulevard and the southwestern corner at the intersection of 7th Street and Harvard Boulevard. The other buildings depicted in the 1921 map were two-story, single-family homes with detached garages, and were present until at least 1959. In 1950 the southwestern lot on Harvard Boulevard and the northeastern lot at the corner of Wilshire Boulevard and Kingsley Drive was occupied by a single-story building. A demolition permit for the entire block was issued July 30, 1959, at which time the owner was Travelers Insurance Co., which was constructing a new high-rise tower and adjacent parking lot (Figure 17). By 1961 all the buildings in the lot had been razed for the construction of the building and parking lot that currently occupy the Project area. The multilevel parking lot—required by the City to be constructed with the building—was constructed with one subterranean level at least 1.5 m (5 feet) below the current sidewalk grade.

NATIVE AMERICAN COORDINATION

Sacred Lands File Search

On November 21, 2016, CAJA Environmental Services received the results of a Sacred Lands File (SLF) search from the NAHC. The NAHC letter indicated that there are no sacred sites in the SLF documented within the Project area. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of five Native American contacts and suggested contacting them to provide information on sacred lands that may not be listed in the SLF. Each of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as part of compliance with AB 52 (PRC Section 21082.3), described below. The NAHC letter is included in Appendix C.

AB 52 Notification and Consultation

As lead agency, the City mailed letters to the 10 listed Native American tribes identified by the NAHC and included on the City's consultation list. Letters were sent out to all contacts on November 10, 2016. Table 1 summarizes the results of Native American outreach conducted in compliance of AB 52 (PRC Section 21082.3).

Native American Contact	City of Los Angele Consultation Effort	Tribal Response
Gabrielino/Tongva Tribe Linda Candelaria, Co-Chairperson 1199 Avenue of the Stars, unit 1100 Los Angeles, CA 90067	11/10/2016: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Indians of California Tribal Council Robert F. Dorame, Chairperson P.O. Box 490 Bellflower, CA 90707	11/10/2016: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Nation Sam Dunlap, Cultural Resources Director PO Box 86908 Los Angeles, CA 90086	11/10/2016: Letter sent by U.S. Mail.	No response.
Fernandeño Tataviam Band of Mission Indians Kimia Fatehi 1019 2nd Street San Fernando, CA 91340	11/10/2016: Letter sent by U.S. Mail.	No response.
Gabrieleno/Tongva Nation Sandonne Goad, Chairperson 106 1/2 Judge John Aiso St., #231 Los Angeles, CA 90012	11/10/2016: Letter sent by U.S. Mail.	No response.

Table 1. Native American Outreach Results

Native American Contact	City of Los Angele Consultation Effort	Tribal Response
Torres Martinez Desert Cahuilla Indians Michael Mirelez, Cultural Resources Coordinator PO Box 1160 Thermal, CA 92274	11/10/2016: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson P.O. Box 693 San Gabriel, CA 91778	11/10/2016: Letter sent by U.S. Mail.	No response.
Soboba Band of Luiseño Indians Joseph Ontiveros, Cultural Resources Director, and Ms. Morillo PO Box 487 San Jacinto, CA 92581	11/10/2016: Letter sent by U.S. Mail.	No response.
Gabrieleño Band of Mission Indians-Kizh Nation Andrew Salas, Chairperson P.O. Box 393 Covina, CA 91723	11/10/2016: Letter sent by U.S. Mail. April-June 2018: correspondences via email and phone requesting consultation. 07/02/2018: Conference call.	 11/14/2016: Response letter sent to the City acknowledging receipt of notification letter and discussing some traditional land uses, indicating the area is highly sensitive for tribal cultural resources, and requesting formal consultation. 7/02/2018: Conference call; email sent with information from multiple sources regarding Native American trails and sacred landscapes, Rancho La Brea, an 1898 map of Los Angeles County, and a screenshot of the Kirkman-Harriman map projected into GoogleEarth in the vicinity of the Project area, the Wikipedia page for Wilshire Boulevard, and a webpage about Native Americans from the City of Culver City website.
San Fernando Band of Mission Indians John Valenzuela, Chairperson PO Box 221838 Newhall, CA 91322	11/10/2016: Letter sent by U.S. Mail.	No response.

To date, the City has received one response to the notification letters. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation, stated the Project area is in a sensitive area and that the Project may cause a substantial adverse change in the significance of tribal cultural resources, and requested a Native American monitor be present during all ground disturbances carried out during the Project. The letter provided some information on tribal history and traditional land uses and noted that resources may exist below existing developments. Chairman Salas requested formal consultation with the City. A telephone consultation occurred on July 02, 2018 and was attended by the City and Chairman Salas. During the call Chairman Salas stated that Wilshire Boulevard is a former trading route and trail used by Native Americans and should be considered a tribal cultural resource. In follow-up emails Chairman Salas provided the City with the following exhibits as evidence to support the claims stated on the call:

- **Exhibit 1:** excerpt from PRC 21074(a)(1) defining a tribal cultural resource;
- Exhibit 2: two articles discussing sacred landscapes and sacred places (Ojibwa 2009, 2013);
- **Exhibit 3:** one article discussing Rancho La Brea (Ojibwa 2017);

- **Exhibit 4:** article discussing Native American trails (Sharp n.d.);
- **Exhibit 5:** article titled *Cultural Resources from an Indigenous Perspective* (National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries n.d.);
- **Exhibit 6:** map of Los Angeles County, ca. 1898, cropped to show the Project area and vicinity along Wilshire Boulevard (Wright et al. 1898);
- **Exhibit 7:** screenshot of the Kirkman-Harriman Map (Kirkman 1938) projected onto an aerial street map in GoogleEarth showing the Project area and vicinity;
- **Exhibit 8:** Wikipedia webpage for Wilshire Boulevard; and
- **Exhibit 9:** webpage about Native Americans from the City of Culver City website (Culver City 2018).

The City carefully considered Exhibits 1–9 in support of their claim that this project has the potential to impact tribal cultural resources, and the Tribe's request for the City to require its proposed mitigation measures to mitigate those potential impacts. The City has concluded that there is no substantial evidence to support a determination that this project could reasonably foreseeably impact tribal cultural resources. Thus, after acting in good faith and after reasonable effort, the City was unable to reach an agreement with the Gabrieleño Band of Mission Indians-Kizh Nation. The City's findings will be submitted in a memo to the Tribe.

Exhibits 1–9 are all taken from publicly available sources and therefore, are not considered to be confidential under Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c). The Tribal response letter and correspondences are included here as part of a confidential attachment (Appendix D).

SENSITIVITY ASSESSMENT

Tribal Cultural Resources

No known tribal cultural resources were identified in a CHRIS records search within the Project area or a 0.5-mile (0.8-km) radius, and the NAHC search of the SLF did not identify any traditional lands or sites. The Native American village of Yaanga and Geveronga are the closest named villages documented in ethnographic accounts, estimated to have been located at least 6 km (3.7 miles) east of the Project area. Generally speaking, Native American artifacts and sites are more likely to be found near sources of water. The closest known permanent water source was the Los Angeles River, located approximately 6.9 km (4.3 miles) east of the Project area. An 1894 topographic map shows the Project area located between 300 and 350 m (984 and 1,148 feet) from unnamed streams that once formed tributaries of the Los Angeles River before it changed courses and became known as Ballona Creek. These streams appear to have been intermittent or ephemeral and only contained water during the wet season for short periods of time. Large Native American archaeological deposits have been documented at the confluence of these streams 6.6 km (4.1 miles) to the southwest, where they supported a wetland environment referred to by the Spanish as Las Cienegas. Seeps of asphaltum are another natural resource of known significance to Native Americans; the closest known source to the Project area is one at the present-day La Brea Tar Pits 3.0 miles (4.8 km) west of the Project area. There is no other evidence available to suggest the Project area offered any consistent or seasonal sources of water or other natural resources that would increase the likelihood of the presence of a temporary Native American camp. By comparison, the confluence of the Los Angeles River and Arroyo Seco near the village site of Yaanga around the historic core of Los Angeles has a higher likelihood of containing prehistoric archaeological sites, consistent with ethnographically documented village site locations.

One geotechnical bore identified alluvial sediments (i.e., sediments deposited by water) extending at least 21.3 m (70) feet below the paved surface in the Project area, which is otherwise developed as a high-rise tower and parking lot. The parking lot extends at least 1.5 m (5 feet) below the current sidewalk grade. The entire Project area was initially developed in the first decade of the nineteenth century as a residential tract, which had expanded to fill the entire city block by the 1920s and remained intact into the late 1950s before being razed for the construction of the Travelers Insurance Company Building and parking lot. Archaeological finds near Union Station clearly demonstrate that the remains of Native American sites can exist within alluvial sediment deposits, underneath disturbed fill or strata containing Historic-period archaeological resources. However, because the demolition of the Project area, the depth and extent of the disturbances substantially reduces the preservation potential for unknown tribal cultural resources within the alluvium. Because of these factors, SWCA finds the Project area has a low sensitivity for containing unknown tribal cultural resources.

CONCLUSION

No previously recorded tribal cultural resources were identified within the Project area. The City submitted notification letters to the tribal parties listed on the City's AB 52 notification list. The City received one response requesting consultation from the Gabrieleño Band of Mission Indians–Kizh Nation. After tribal consultation, the City concluded there is no substantial evidence of a tribal cultural resource within the Project area. SWCA finds that the Project would have no impacts to known tribal cultural resources. The Project area was further assessed for the potential to contain deeply buried, previously unidentified tribal cultural resources have the potential to be low. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, the Project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Based on the condition of approval, any potential impacts would be reduced to less than significant. Therefore, SWCA finds that the Project will have less-than-significant impacts to tribal cultural resources.

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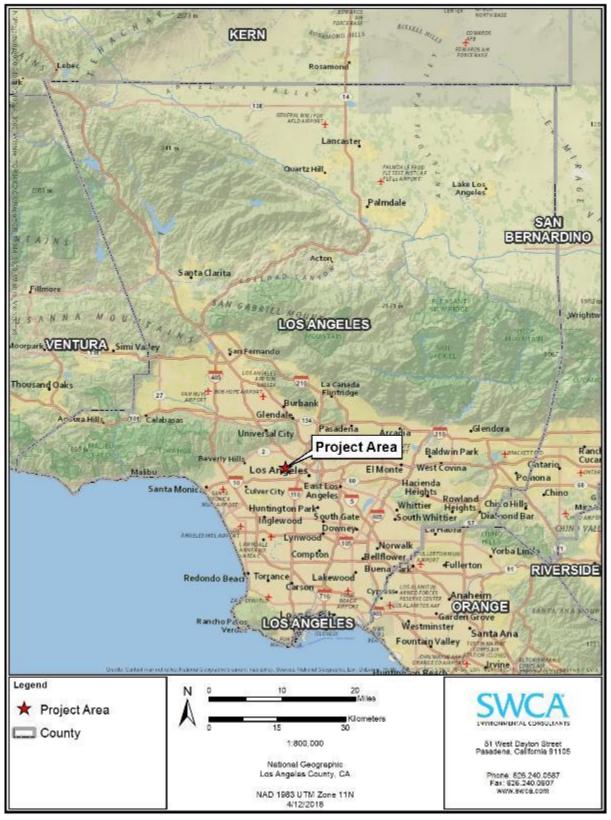


Figure 1. Project area and vicinity within Los Angeles County.

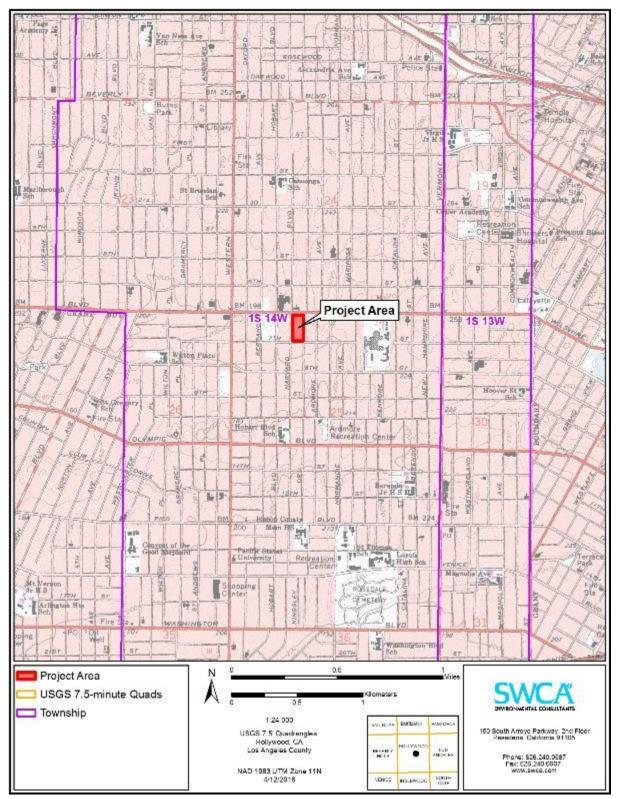


Figure 2. Project area and 0.5-mile radius plotted on USGS Los Angeles and Hollywood, California, 7.5-minute topographic quadrangles.



Figure 3. Project area with associated parcels on a 2017 aerial and street map.

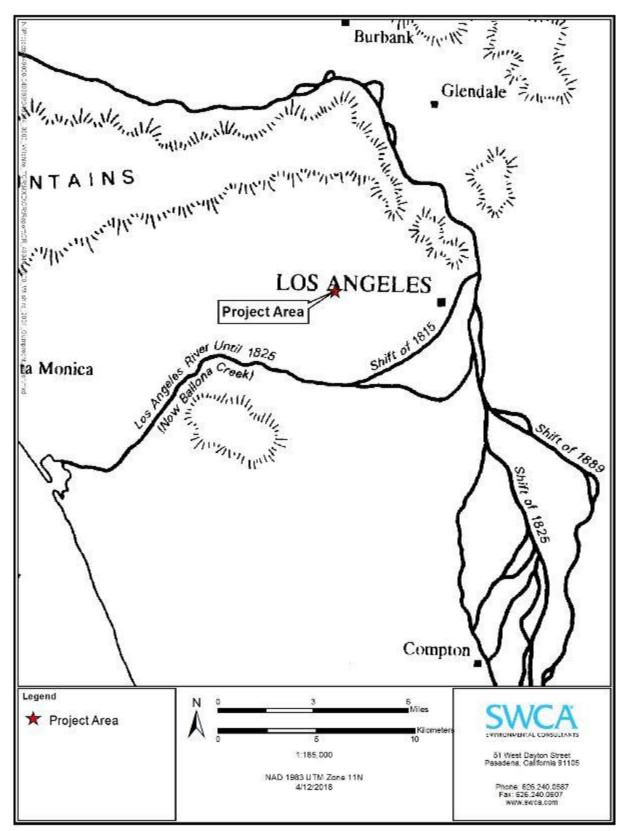


Figure 4. Multiple courses of the Los Angeles River channel as depicted by Gumprecht (2001:140).

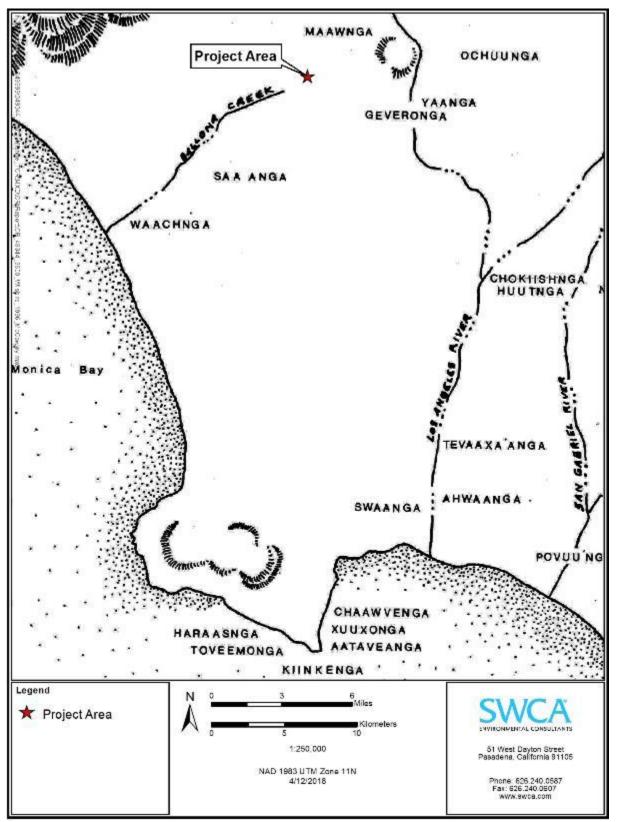


Figure 5. Project area and 0.5-mile radius plotted on McCawley's (1996:36) map showing the approximate location of villages cited in Gabrielieno/Tongva ethnographic sources.

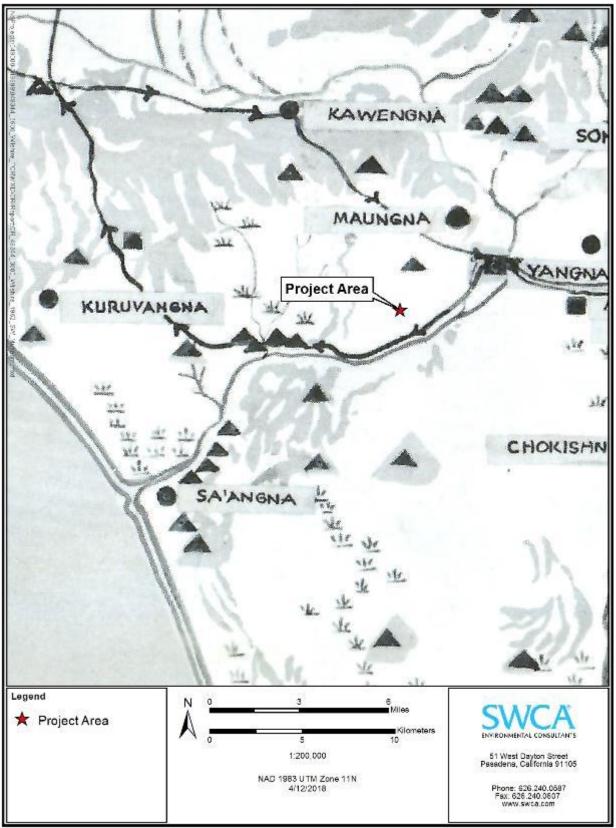


Figure 6. Project site plotted on the Southwest Museum (1962; reprinted in Johnston 1962) map of Native American village locations and historical features in the Los Angeles Basin.

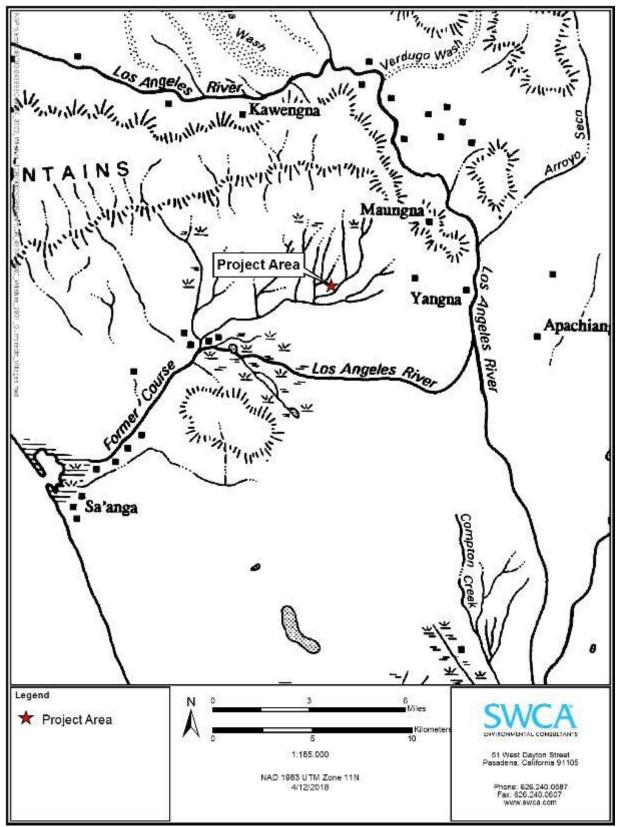


Figure 7. Project area plotted on Gumprecht's (2001:30) map showing hypothetical locations of Native American villages along the Los Angeles River and other waterways in the Los Angeles Basin.

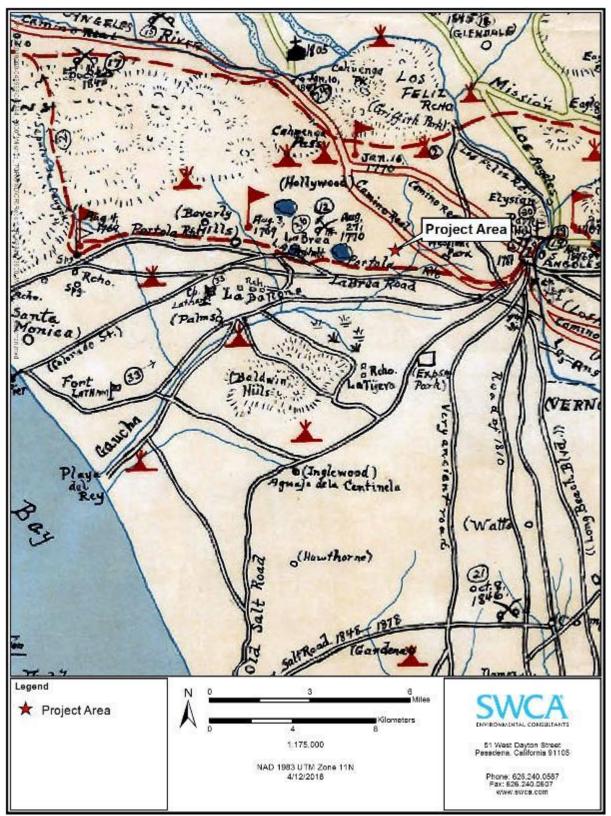


Figure 8. Kirkman-Harriman's pictorial and historical map of Los Angeles County, 1860–1937. Historical sites and features are depicted with symbols to indicate representational rather than explicit geographic locations.

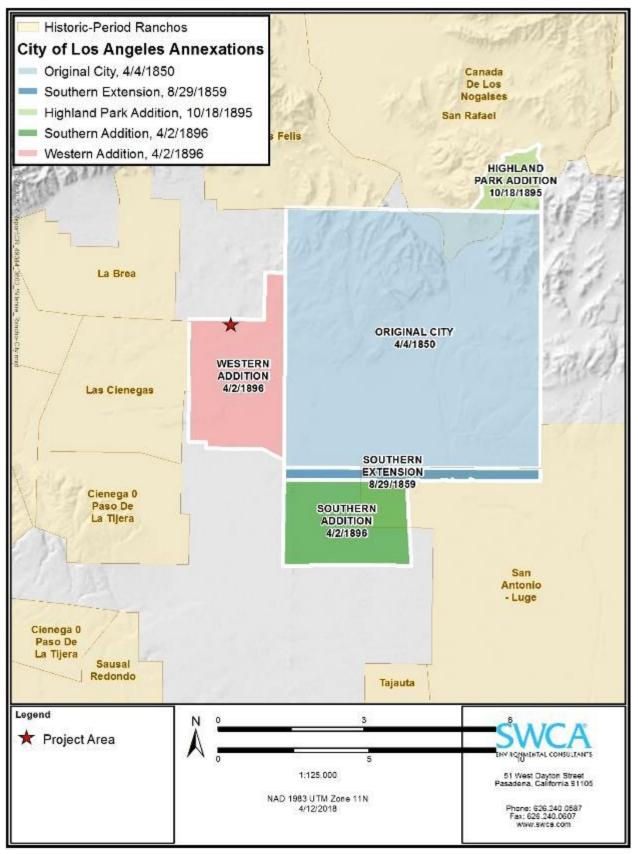


Figure 9. Historical ranchos and the City of Los Angeles boundary showing annexations as of 1896.

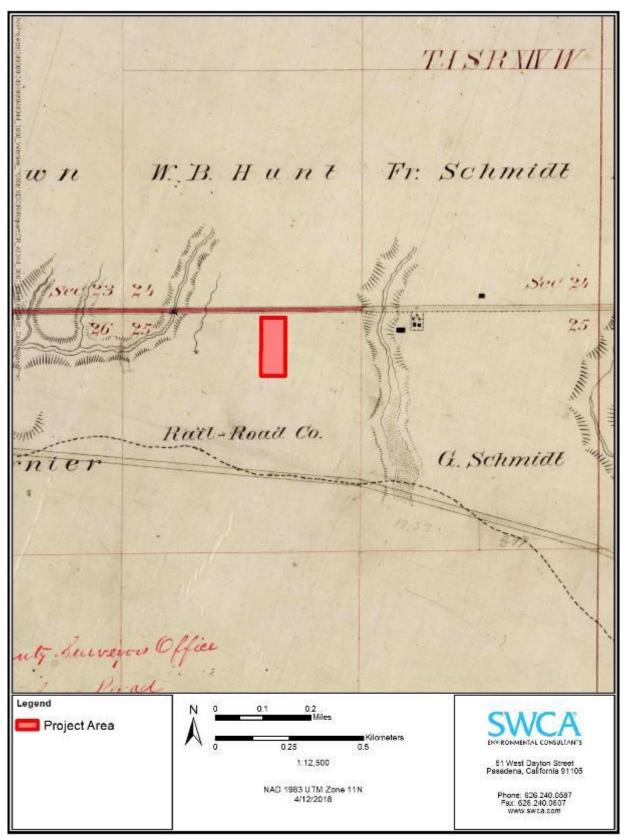


Figure 10. Project area depicted on an 1875 survey map; note the partially drawn segments of local stream courses and topography (Seebold 1875).

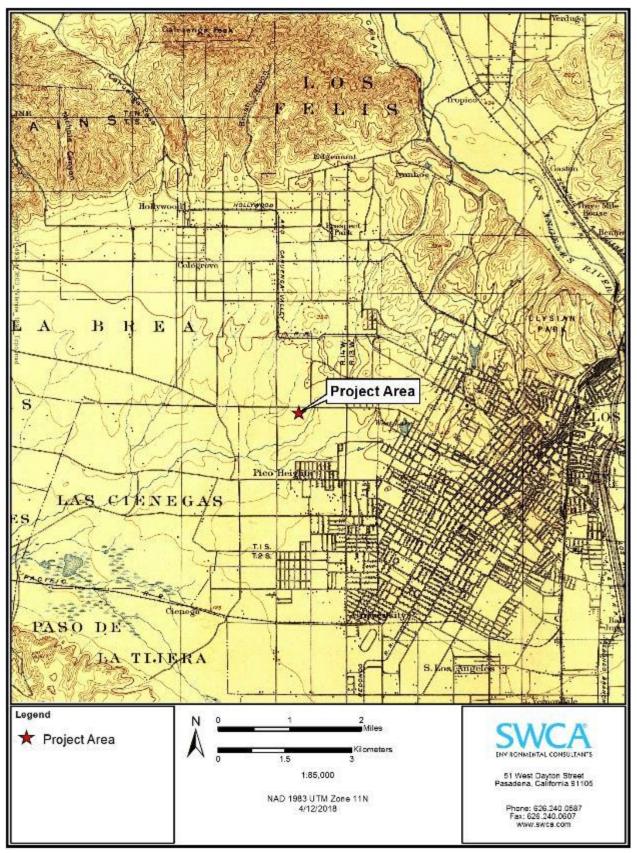


Figure 11. Project area depicted on the 1894 USGS topographic quadrangle, Los Angeles, California.

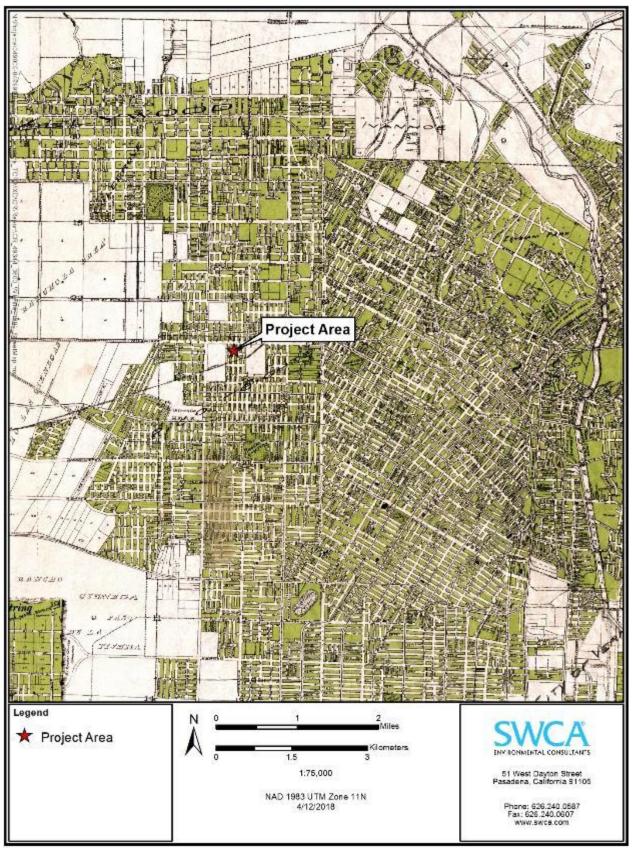


Figure 12. Project area depicted on a 1909 street map of Los Angeles.

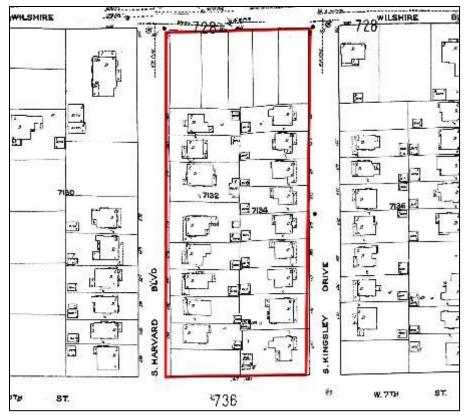


Figure 13. Sanborn Fire Insurance map from 1921 and the Project area (red outline).

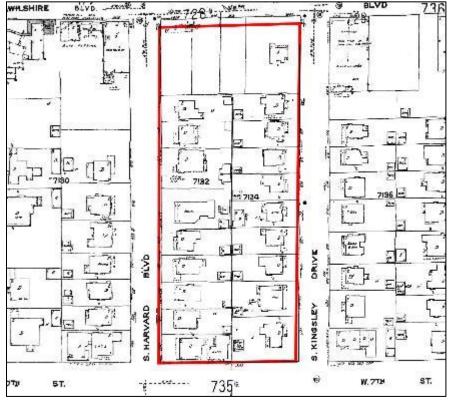


Figure 14. Sanborn Fire Insurance map from 1950 and the Project area (red outline).

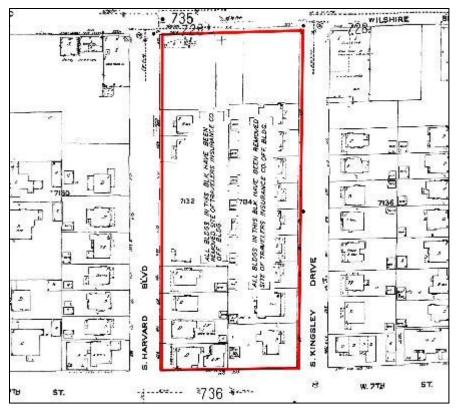


Figure 15. Sanborn Fire Insurance map from 1961 and the Project area (red outline)

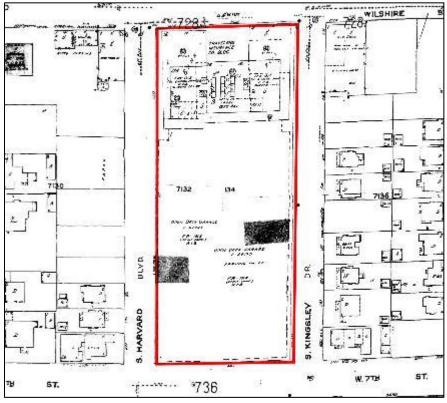


Figure 16. Sanborn Fire Insurance map from 1968 and the Project area (red outline).



Figure 17. Travelers Insurance Company Building, under construction in 1961; view facing northwest from Kingsley Drive (Source: University of Southern California Digital Library).

Appendix B. California Historical Resources Information System Record Search Results

SCCIC Report No.	Study Title	Author: Affiliation	Year	Report Type	Proximity to Project Area
LA-01844	Cultural Resources Survey: Korea Plaza Hotel	Greenwood, Roberta S. and John M. Foster: Greenwood and Associates	1989	Archaeological, Field study	Outside
LA-01968	Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los, Angeles, Los Angeles County, California	Bissell, Ronald M.: RMW Paleo Associates, Inc.	1989	Literature search	Outside
LA-02089	Draft Environmental Impact Report L.A. EIR #89-0152-zc(gpa) Sch #89072616 Korea Plaza Hotel a Mixed Commercial for Development	Anonymous: Gruen and Associates	1990	Management/planning	Outside
LA-03496	Draft Environmental Impact Report Transit Corridor Specific Plan Park Mile Specific Plan Amendments	Anonymous: Unknown		Management/planning	Outside
LA-05087	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 241-01, County of Los Angeles, Ca	Duke, Curt: LSA Associates, Inc.	1999	Literature search	Outside
LA-05336	Cultural Resource Assessment for Pacific Bell Wireless Facility Sm 919-01, County of Los Angeles, Ca	Lapin, Philippe: LSA Associates, Inc.	2000	Literature search	Outside
LA-05337	Cultural Resource Assessment Cingular Wireless Facility No. Sm 099-01 Los Angeles County, California	Wallock, Nicole: LSA Associates, Inc.	2001	Literature search	Outside
LA-06411	Cultural Resource Assessment/evaluation for Cingular Wireless Site La- 239-05, Los Angeles County, California	McKenna, Jeanette A.: McKenna et al.	2001	Archaeological, Architectural/historical, Evaluation, Field study	Outside
LA-06416	Cultural Resource Assessment Cingular Wireless Facility No. Sm 099-04 Los Angeles County, California	Duke, Curt and Marvin, Judith: LSA Associates, Inc.	2001	Literature search	Outside
LA-06431	Nextel Communications CA-7841/Kingsley 3727 West Sixth Street Los Angeles, California	Unknown: Earthtouch, LLC		Archaeological, Field study	Outside
LA-06455	Cultural Resource Assessment Cingular Wireless Facility No. Sm 200-02 Los Angeles County, California	Duke, Curt and Marvin, Judith: LSA Associates, Inc.	2002	Archaeological, Architectural/historical, Evaluation, Field study	Outside
LA-07339	Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60x429c (Wilshire) 3921 Wilshire Boulevard, Los Angeles, Los Angeles County, California	Bonner, Wayne H. and Christeen Taniguchi: Michael Brandman Associates	2004	Archaeological, Field study	Outside
LA-07362	Cultural Resource Assessment Cingular Wireless Facility No. Sc-610-01 City and County of Los Angeles, California	Bartoy, Kevin M.: Pacific Legacy, Inc.	2004	Literature search	Outside
LA-07372	A Phase I Archaeological Study for the Proposed Mugunghwa Senior Center Affordable Housing Project Located at 965-975 S. Normandie Avenue and 950-954 S. Irolo Street City of Los Angeles, County of Los Angeles, California	Wlodarski, Robert J.: Historical, Environmental, Archaeological, Research, Team	2004	Archaeological, Field study	Outside

Table B-1. Previously conducted cultural resource studies within a 0.5-mile (0.8-km) radius of Project area.

SCCIC Report No.	Study Title	Author: Affiliation	Year	Report Type	Proximity to Project Area
LA-07562	Additional Information for Dseis, Core Study Alignments 1, 2, 3, 4, and 5	Greenwood, Roberta S.: Greenwood and Associates	1987	Architectural/historical, Evaluation, Literature search	Outside
LA-07565	Technical Report Archaeology Los Angeles Rail Rapid Transit Project "Metro Rail" Core Study, Candidate Alignments 1 to 5	Unknown: Greenwood and Associates	1987	Management/planning	Outside
LA-07566	Technical Report Dseis, Core Study Alignments 1, 2, 3, 4, and 5	Hatheway, Roger G. and Peter, Kevin J.: Greenwood and Associates	1987	Archaeological, Architectural/historical, Other research	Outside
LA-07775	Direct and Indirect Ape Historic Architectural Assessments for Sprint Telecommunications Facility Candidate La60xc429c (Wilshire) 3921 Wilshire Boulevard, Los Angeles, Los Angeles County, California	Bonner, Wayne H.: Michael Brandman Associates	2004	Archaeological, Field study	Outside
LA-08020	Technical Report: Cultural Resources Los Angeles Rail Rapid Transit Project "metro Rail" Core Study	Anonymous: Southern California Rapid Transit District	1987	Architectural/historical, Evaluation	Outside
LA-08028	Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Building at 3301 West 8th Street, Aka 761 South Normandie Avenue in the City of Los Angeles, (Los Angeles County), California	Galvin, Andrea: Galvin & Associates	2004	Archaeological, Architectural/historical, Evaluation, Field study	Outside
LA-08251	Los Angeles Metro Red Line Project, Segments 2 and 3 Archaeological Resources Impact Mitigation Program Final Report of Findings	Gust, Sherri and Heather Puckett: Cogstone Resource Management, Inc.	2004	Archaeological, Architectural/historical, Evaluation, Excavation, Monitoring, Other research	Outside
LA-08266	Archaeological Survey Report for the Ardmore Heights Apartments Project Located at 959-961 and 963-973 S. Ardmore Avenue, Los Angeles, California	Wood, Catherine M.: Jones and Stokes	2007	Archaeological, Field study	Outside
LA-09542	Direct APE Historic Architectural Assessment for T-Mobile Candidate SV11703B (Wilshire Catalina), 3325 Wilshire Blvd, Los Angeles, Los Angeles County, California.	Bonner, Wayne H. and Kathleen Crawford: Michael Brandman Associates	2008	Architectural/historical, Evaluation	Outside
LA-10507	Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report	Anonymous: Westec Services, Inc.	1983	Archaeological, Evaluation, Field study, Other research	Outside
LA-10620	Cultural resources Study of the 738 Mariposa Apt Project, AT&T Site No. A- EL0083B, 738 Mariposa Avenue, Los Angeles, California 90005	Supernowicz, Dana: Historic Resource Associates	2009	Archaeological, Field study	Outside
LA-11005	Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report	Unknown, Mr./Mrs.: Cogstone	2010	Other research	Outside
LA-11398	Cultural Resource Records Search and Site Survey, AT&T Site LAC182, Wilshire Western, 3850 Wilshire Blvd, Los Angeles, Los Angeles County, California 90005, CASPR #3551278720	Loftus, Shannon: ACE Environmental, LLC	2011	Archaeological, Field study	Outside

Table B-1. Previously conducted cultural resource studies within a 0.5-mile (0	0.8-km) radius of Project area.
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SCCIC Report No.	Study Title	Author: Affiliation	Year	Report Type	Proximity to Project Area
LA-11428	Historic Architectural Resource Inventory and Assessment, AT&T Site LAC182, Wilshire Western, 3850 Wilshire Boulevard, Los Angeles, Los Angeles County, California 90005 CASPR# 3551278720	Loftus, Shannon: ACE Environmental, LLC	2011	Architectural/historical, Evaluation	Outside
LA-11642	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	Daly, Pam and Sikes, Nancy: Cogstone	2012	Archaeological, Field study, Other research	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. & LA County Metro Transit Authority	2012	Management/planning	Outside
LA-11947	Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate LA70XC463 (U-Lock Storage-CA8290 Irolo), 761 South Normandie Avenue, Los Angeles, Los Angeles County, California	Bonner, Wayne: MBA	2012	Archaeological, Field study	Outside
LA-11997	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate Sv00241A (LA241 Western Parking) 633 Western Avenue, Los Angeles County, California	Bonner, Wayne: MBA	2012	Archaeological, Field study	Outside
LA-12050	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA03613F (SC613 Kingsley), 901 South Kingsley Drive, Los Angeles, Los Angeles County, California	Bonner, Wayne: MBA	2012	Archaeological, Field study	Outside
LA-12395	Cultural Records Search and Site Visit Results for AT&T Mobility, LLC, Candidate EL0083 (738 Mariposa Apt), 738 South Mariposa Avenue, Los Angeles, Los Angeles County, California, CASPR No.3551015805	Bonner, Wayne and Crawford, Kathleen: EAS	2013	Archaeological, Architectural/historical, Evaluation, Field study	Outside
LA-13079	Cultural Resources Records Search and Site Visit Results for T Mobile West, LLC Candidate SV00143A (SM099 U-Lock Storage), 761 South Normandle Avenue, Los Angeles, Los Angeles County, California	Bonner, Wayne H. and Kathleen A. Crawford: Environmental Assessment Specialists, Inc.	2013	Archaeological, Architectural/Historical, Field study	Outside
LA-13144	Cultural Resource Records Search and Site Survey, AT&T Site LA0467, Saint Basil Church, 647 South Kingsley Avenue, Los Angeles, Los Angeles County, California 90010 Caspr# 3551017344	Loftus, Shannon L.: Ace Environmental, LLC	2013	Archaeological, Architectural/Historical, Field study	Outside
LA-13144A	Historic Architectural Resource Inventory and Assessment	Loftus, Shannon L.: Ace Environmental, LLC	2013	Architectural/Historical, Field study	Outside

Appendix C. Sacred Lands File Search

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 (916) 373-3710 (916) 373-5471 FAX



November 21, 2016

Rachel Zacuto, Assistant Environmental Planner City of Los Angeles

Sent by E-mail: Rachel@ceqa-nepa.com

RE: Proposed 3600 Wilshire Project, City of Los Angeles; Hollywood USGS Quadrangle, Los Angeles County, California

Dear Ms. Zacuto:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. Please note that the intent of the reference codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public agencies** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

- 1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
 - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

- 2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measurers.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure in accordance with Government Code Section 6254.10.

- 3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. <u>A search of the SFL was completed for the project with negative results.</u>
- 4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand well help to facilitate the consultation process.

The results of these searches and surveys should be included in the "Tribal Cultural Resources" section or in a separate subsection of the Cultural Resources section of the environmental document submitted for review. Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <u>http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf</u>.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

Jarle fot

Gayle Totton, M.A., PhD. Associate Governmental Program Analyst

Native American Heritage Commission Tribal Consultation List Los Angeles County November 21, 2016

Gabrieleno/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson P.O. Box 693 Gabrielino Tongva San Gabriel , CA 91778 GTTribalcouncil@aol.com (626) 483-3564 Cell Gabrieleno Band of Mission Indians - Kizh Nation Andrew Salas, Chairperson P.O. Box 393 Covina , CA 91723 gabrielenoindians@yahoo.com Gabrielino (626) 926-4131

Gabrielino /Tongva Nation Sandonne Goad, Chairperson 106 1/2 Judge John Aiso St., #231 Gabrielino Tongva Los Angeles CA 90012 sgoad@gabrielino-tongva.com (951) 807-0479

Gabrielino Tongva Indians of California Tribal Council Robert F. Dorame, Tribal Chair/Cultural Resources P.O. Box 490 Gabrielino Tongva Bellflower , CA 90707 gtongva@verizon.net (562) 761-6417 Voice/Fax

Gabrielino-Tongva Tribe Linda Candelaria, Co-Chairperson 1999 Avenue of the Stars, Suite 1100 Los Angeles , CA 90067

Gabrielino

(626) 676-1184 Cell

Soboba Band of Luiseno Indians Joseph Ontiveros, Cultural Resource Department P.O. BOX 487 Luiseno San Jacinto , CA 92581 Cahuilla jontiveros@soboba-nsn.gov (951) 663-5279

(951) 654-5544, ext 4137

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list applicable only for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed 3600 Wilshire Project, City of Los Angeles, Los Angeles County, California.

Appendix D. Confidential Native American Coordination Documents [CONFIDENTIAL—NOT FOR PUBLIC DISTRIBUTION]

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.

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)