

**APPENDIX G**

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**Tribal Cultural Resource Assessment**

Tribal Cultural Resources  
Assessment, 350 South Figueroa,  
World Trade Center,  
City of Los Angeles, California

MARCH 2019

PREPARED FOR  
**Jamison Properties, LP**

PREPARED BY  
**SWCA Environmental Consultants**



**Tribal Cultural Resources Assessment,  
350 South Figueroa, World Trade Center  
City of Los Angeles, California**

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## MANAGEMENT SUMMARY

**Purpose and Scope:** SWCA Environmental Consultants (SWCA) conducted a tribal cultural resources assessment for the proposed 350 South Figueroa Project (project) in the city of Los Angeles, California. The project proposes to expand and redevelop the existing facility, including the partial demolition of the existing building, to create a 41-story multi-family residential development in downtown Los Angeles on a 3.68-acre property located at 350 South Figueroa Street (project site). The City of Los Angeles Department of City Planning (the City) is the lead agency for the project. The following study addresses tribal cultural resources for purposes of compliance with the California Environmental Quality Act (CEQA), specifically Assembly Bill 52 (AB 52), but also includes relevant portions of Public Resources Code Sections 5024.1, 15064.5, 21074, 21083.2, 21084.1, and 21084.2. CEQA requires a lead agency to analyze whether tribal cultural resources may be adversely affected by a proposed project. SWCA conducted the following study to determine whether any tribal cultural resources have been previously documented or are likely to occur in the project site and to make recommendations for avoiding adverse impacts to those resources as a result of implementing the proposed project. The report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to make the determination.

**Dates of Investigation:** SWCA conducted a CHRIS search for the project site plus a 0.5-mile radius on February 7, 2019, at the South Central Coastal Information Center located at California State University, Fullerton. On February 12, 2019, the Native American Heritage Commission submitted the results of a Sacred Lands File search in response to the City's notification of the project. AB 52 notification letters were sent to 10 tribal groups on December 5, 2018, and consultation was initiated with one tribal party, who consulted with the City on February 14, 2019.

**Conclusion:** The CHRIS search identified no previously recorded tribal cultural resources within the project site or 0.5-mile radius. A literature search and archival research identified several former Native American communities located between 0.5 and 1.5 miles to the east-northeast of the project site, near the Los Angeles Plaza, Union Station, and eastern portions of the downtown area. The Native American Heritage Commission's search of the Sacred Lands File did not identify any sacred lands or sites. AB 52 consultation was initiated with representatives from the Gabrieleño Band of Mission Indians-Kizh Nation. No other tribal parties that received AB 52 notifications responded to the City. Consultation efforts between City Planning and the Gabrieleño Band of Mission Indians-Kizh Nation is on-going, and the results will be included in the project file on record with City Planning.

Ground disturbances for the project will occur during the proposed demolition, site preparation, and grading phases, estimated to require up to 30 feet of excavation below the surrounding street elevation. SWCA assessed the potential for an unidentified tribal cultural resource to be present below the surface that could be encountered during the proposed ground disturbing activities. Although the location with a shallow alluvial basin near one or more braided streams would have provided a setting that would have been generally favorable for Native American use, prehistorically and during the Historic period, the excavation for the existing subterranean parking lot would have destroyed any physical remains that may have been present. As a result, the potential for unidentified tribal cultural resources within the project site is found to be low. The project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, 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 Jamison Properties, LP, the Los Angeles Department of City Planning, and the South Central Coastal Information Center at California State University, Fullerton. Research materials and the report are also on-file at the SWCA Pasadena office.

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## **INTRODUCTION**

SWCA Environmental Consultants (SWCA) conducted a tribal cultural resources assessment for the proposed 350 South Figueroa Project (project) in the city of Los Angeles, California. The project proposes to expand and redevelop the existing facility, including the partial demolition of the existing building, to create a 41-story multi-family residential development in downtown Los Angeles on a 3.68-acre property located at 350 South Figueroa Street (project site). The City of Los Angeles Department of City Planning (the City) is the lead agency for the project. The following study addresses tribal cultural resources for purposes of compliance with the California Environmental Quality Act (CEQA), specifically Assembly Bill 52 (AB 52), but also including relevant portions of Public Resources Code (PRC) Sections 5024.1, 15064.5, 21074, 21083.2, 21084.1, and 21084.2. CEQA requires a lead agency to analyze whether tribal cultural resources may be adversely affected by a proposed project. SWCA conducted the following study to determine whether any tribal cultural resources have been previously documented or are likely to occur in the project site and to make recommendations for avoiding adverse impacts to those resources as a result of implementing the proposed project. The report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to make the determination.

SWCA Field Director Trevor Gittelhough, M.A., conducted background research and authored the report. SWCA Project Manager Chris Millington, M.A., Registered Professional Archaeologist (RPA), prepared all figures and reviewed this report for quality assurance/quality control. All figures prepared for the report are included in Appendix A; Appendix B contains the results of a Sacred Lands File search conducted by the Native American Heritage Commission (NAHC); Appendix C contains the non-confidential record of AB 52 consultation; Appendix D contains the confidential record of AB 52 consultation. Copies of this report are on file with SWCA's Pasadena Office, the City, and the South Central Coastal Information Center (SCCIC).

## **PROJECT DESCRIPTION**

The project proposes to construct, expand, and redevelop the present facility at 350 South Figueroa Street in downtown Los Angeles. The project involves the partial demolition of an existing building and construction of a 41-story multi-family residential tower. This structure will be built over the existing three levels of subterranean parking, estimated to require up to 30 feet of excavation below the surrounding street elevation. The project includes 656,350 square feet of total floor area on the 3.87-acre (168,577-square-foot) lot. The project would demolish the existing southern building located on the property and renovate the northern building. The surrounding area is heavily urbanized and defined by commercial and residential properties.

The project 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 (Figure 1). The project site is located at 350 South Figueroa Street on a 3.68-acre, roughly rectangular property located between Flower and Figueroa Street, south of 3rd Street and north of 4th Street in downtown Los Angeles. The project site is specifically bounded by West 3rd Street to the northeast, Figueroa Street to the northwest, South Flower Street to the southeast, and West 4th Street to the southwest (Figure 2). The project site consists of a single parcel with the Assessor's Parcel Number (APN) 5151-011-020.

## **REGULATORY SETTING**

### **State Regulations**

#### ***Assembly Bill 52***

AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, 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 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 site and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, 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 before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

### ***California Register of Historical Resources***

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

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

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

### ***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 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, California 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 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.

### ***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; and (2) 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 the City approves this plan.
- 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 site.

### **CHRIS Records Search**

On February 7, 2018, SWCA conducted a CHRIS records search at the SCCIC on the campus of California State University, Fullerton, to identify previously documented archaeological resources within a 0.8-km (0.5-mile) radius of the project site, 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 California Office of Historic Preservation's portion of the Historic Resources Inventory. Confidential CHRIS results include specific information on the nature and location of sensitive archaeological site, including those that could be tribal cultural resources, 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.

### **Sacred Lands File**

On February 7, 2019, SWCA submitted a request to the NAHC to conduct a search of their Sacred Lands File (SLF). SWCA received the results on February 12, 2019. The SLF is a confidential inventory of sacred sites and places of special religious or social significance to Native Americans, which is maintained by members of the NAHC. Not all sites included in the SLF are also listed in the CHRIS.

### **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 site. Research focused on a variety of primary and secondary materials relating to the history and development of the project site, 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 site. Sources consulted included the following publicly accessible data sources: City of Los Angeles Office of Historic Resources (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, Inc. (Prince and Tang 2018), the Environmental Site Assessment for the project site by A/E West Consultants Inc. (Hunt 2005), and the Historical Resource Evaluation Report prepared by GPA Consulting (Paluszek 2018).

## **Sensitivity Assessment**

The absence of any tribal cultural resources in a given location could indicate that there were simply no material remains from past use by Native Americans, or that remains once present have been destroyed, removed, or otherwise not preserved at the location, either because of natural causes (e.g., erosion, flooding) or historical development. In circumstances where a known tribal cultural resource is not identified through background research, SWCA assessed the potential for the presence of an unidentified resource (i.e., sensitivity). That determination considers whether the location was favorable for Native American habitation, historical use of the project vicinity broadly, and the physical setting specifically, including an assessment of whether the setting is capable of containing buried material. Information from archaeological, geotechnical, or geological studies conducted nearby are considered to help assess the existing site conditions where direct inspection of the project site is not feasible. Lacking any data specifically gathered to assess the presence or absence of material below the surface, the resulting sensitivity is by nature qualitative, ranging along a spectrum of increasing probability for encountering such material, designated here as low, moderate, and high. Indicators of favorable habitability for Native Americans are proximity to natural features (e.g., perennial water source, plant or mineral resource, animal habitat), other known sites, flat topography, and relatively dry conditions. Areas with a favorable setting for habitation or temporary use, soil conditions capable of preserving buried material, and little to no disturbances are considered to have a high sensitivity. Areas lacking these traits are considered to have low sensitivity. Areas with a combination of these traits as are considered as having moderate sensitivity.

## **ENVIRONMENTAL SETTING**

The project site is in the Los Angeles Basin, a broad, level plain defined by the Pacific Ocean to the west, the Santa Monica Mountains and Puente Hills to the north, and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments (California Geological Survey 2000; Dibblee 1991). It is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana rivers. The south-flowing Los Angeles River is currently located approximately 2.4 km (1.5 miles) east of the project site, though, historically, the channel has shifted courses several times during flood events (Figure 3). The first recorded shift of the river occurred in 1815 when floodwaters overflowed the former channel, shifting the course at least 0.8 km (0.5 mile) to the southwest, near the present route of Spring Street and just over 0.7 miles west of the project site. Alluvial terraces formed where flooding water eroded into adjacent hillsides. In the downtown Los Angeles area, the backslopes in the location of Bunker Hill defined the edge of the historical floodplain.

Historically, the soils for the location of the project site were described as Hanford loam, described as varying between 12 and 72 inches deep, consisting of a brown, friably, light-textured, micaceous loam (Nelson et al. 1919:55). While the soil unit generally lacked gravel inclusions, the study notes that small patches and low strips of gravel occur in the courses of streamways where flooding had occurred, as in an area north of Exposition Park in the former westward course of the Los Angeles River (Nelson et al. 1919:55). A recent work published by the California Geological Survey synthesized previous studies of the surficial geology and designated a more detailed typology (California Geological Survey 2000). According to the California Geological Survey map, the project site is in the Young Alluvial Valley Deposits (abbreviated Qya) unit, which is mapped to the same approximate area reported in 1919. The sediments that form the Qya unit were deposited after approximately 12,500 years ago, during the late Pleistocene, and before approximately 1000 years ago, during the Holocene (California Geological Survey 2000).

Consistent with the Nelson et al. (1919) description of the Hanford loam, the Qya is described as consisting of clay, silt, sand, and gravel along stream valleys and alluvial flats of large rivers.

Geotechnical reports from the vicinity of the project site were reviewed by Geotechnologies, Inc. (Prince and Tang 2018). Two of the previous geotechnical studies, on Huntly Drive, identified bedrock between 2 and 25 feet below the existing surface, while two other studies, on Grand Avenue, encountered bedrock between 2 and 6 feet below surface (Prince and Tang 2018:2–3). The project site is currently developed on three subterranean parking levels extending over 30 feet below the existing surface into the underlying shale bedrock.

## **CULTURAL SETTING**

### **Prehistory**

#### ***Prehistoric Overview***

Numerous chronological sequences have been devised 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 obtained by southern California researchers in the last three decades (Byrd and Raab 2007:217). Several revisions have been 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. 10,000–6000 B.C.)**

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 (6000–3000 B.C.)**

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 (3000 B.C.—A.D. 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, 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 (A.D. 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, 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 A.D. 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that ceramics were obtained by trade with neighboring groups to the south and east. 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 A.D. 500 and European contact 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, Juaneño, and Luiseño people in this region are considered to be the descendants of the Uto-Aztecans, Takic-speaking populations that settled along the California coast during this period.

## **Ethnographic Overview**

The project site is in an area historically occupied by the Gabrielino (Bean and Smith 1978:538; Kroeber 1925: Plate 57). Surrounding native groups included the Chumash and Tataviam/Alliklik to the north, the



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 is used in the remainder of this report to designate native people of the Los Angeles Basin and their descendants.

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

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

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

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996:157). Remains were buried in distinct burial areas, either associated with villages or without apparent village association (Altschul et al. 2007). Cremation ashes have

been found in archaeological contexts buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966:27), as well as scattered among broken ground stone implements (Cleland et al. 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (Dakin 1978:234–365; Johnston 1962:52–54; McCawley 1996:155–165).

For more than 2,500 years, the Gabrieleno and their predecessors practiced the kotuumot kehaay, or mourning ceremony, an important community ritual by which the living assisted the soul of the deceased on its journey to the land of the dead (Hull 2011, 2012; Hull et al. 2013). Not only an act of loving remembrance, the Gabrieleno believed that the spirits of the deceased were dangerous and must be treated properly lest they molest the living (Boscana 1846). Observed every 1 to 4 years to commemorate those who had died since the previous iteration, the eight-day mourning ceremony was either conducted in late summer or in the same month as the person to be honored had died. The ceremony included four primary rites: ritual clothes washing, clothes burning, image burning, and a distribution of the property of the dead. It took place within a 5-yard-diameter circular brush enclosure called a yovaar, which was decorated with poles at cardinal directions topped with figures, or around a 40- to 50-ft.-tall central kotuumot pole that was painted in various colors representing body parts and erected in a pit in the ground surrounded by offerings of food, clothing, baskets, beads, and money. It included a hosted feast, paid dancers, and the ritual destruction and burial of valuable goods (McCawley 1996:161–165; Merriam 1955).

Hugo Reid (1978:235), a Scottish immigrant married to a Gabrieleno woman and owner of San Gabriel Mission in the 1840s, described the post-burial treatment of grave goods by the Gabrieleno in his 1852 letters:

When a person died, all the kin collected to lament and mourn his or her loss. After lamenting a while a mourning dirge was sung. If the deceased were the head of the family, or a favorite son, the hut in which he died was burned up, as likewise all of his personal effects, reserving only some article or another, or a lock of hair. This reservation was not as a memento of the deceased, but to make a feast with on some future occasion, generally after the first harvest of seeds and berries.

Discussing the culmination of the ceremony itself, Reid (1978:242–243) continued:

On the eighth day the...old women were employed to make more food than usual, and when the sun was in its zenith, it was distributed, not only among the actors, but to the spectators likewise. After eating, a deep hole was dug, and a fire kindled in it, when the articles reserved at the death of relatives were committed to the flames; at the same time, baskets, money, and seeds were thrown to the spectators, as in the marriage ceremony. During the burning process, one of the seers, reciting mystical words, kept stirring up the fire to ensure the total destruction of the things. The hole was then filled up with earth and well trodden down. The feast was over.

This mourning ceremony has deep roots in Southern California, predating the Mission period (1769–1834) by at least 2,000 years (Hull et al. 2013). It was reportedly practiced in mid-nineteenth century Gabrieleno communities in San Fernando, Piru, and Saticoy (Blackburn 1976:232), in neighboring Luiseño- and Cahuilla-speaking regions, near the San Gabriel Mission (Dietler et al. 2018), and in Los Angeles in the approximate location of the project site (Morris et al. 2016).

## **Native American Communities in Los Angeles**

The project site is within the traditional territory of the Gabrielino (King 2004; McCawley 1996:36–40). 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.

Although the precise location of any given village is subject to much speculation, it is clear the greater Los Angeles area once contained many Gabrielino villages, including several concentrated along the banks of major waterways (Figure 4). This settlement pattern is reflected in historical maps published by the Southwest Museum (1962; reprinted in Johnston 1962) and George Kirkman (1938), shown here with the project site plotted in Figure 5 and Figure 6, respectively. Maps such as these convey a general sense of significant historical areas based on the geographic information available at the time and are considered as a representational depiction of these locations rather than explicit geographic points.

The closest ethnographically documented village to the project site 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 (McCawley 1996:57), approximately 1 mile east-northeast of the project site (Figure 7)<sup>1</sup>. 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 (see Figure 7). Dillon (1994) presented an exhaustive review of the potential locations, most within several blocks of the pueblo plaza. Johnston (1962:122) concluded that “in all probability Yangna lay scattered in a fairly wide zone along the whole arc [from the base of Fort Moore Hill to Union Station], and its bailiwick included as well seed-gathering grounds and oak groves where seasonal camps were set up.” A second village, known as Geveronga, has also been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles, though much like Yaanga, its location can only be inferred from ethnographic information (McCawley 1996:57).

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

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<sup>1</sup> Historical features and points of reference for several of the ethnographically significant sites and events mentioned in the subsequent discussion are depicted in Figure 7. These former courses of the Los Angeles River (as reported by Gumprecht 2001), the Los Angeles Plaza, former locations of the Aliso Tree and Bella Union Hotel, multiple locations of Yaanga described in various documents, and several rancherias occupied by Gabrielino during the Mexican and early Historic periods. The sites are plotted on a topographic prepared by Crandell (2010), which depicts historical contours and former stream courses, as well as elements of the built environment, including zanjas and city blocks that formed the “Lower District” (now downtown Los Angeles).

more” in 1970 during the rebuilding of the Bella Union Hotel on the 300 block of North Main Street (Johnston 1962:121; Robinson 1979:12). The preponderance of available evidence indicates that there were one or more early Historic-period Native American communities west of the Los Angeles River near the original pueblo 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 was documented to have been founded directly adjacent to this village. The location of Yaanga was also referenced by long-time Los Angeles resident Narciso Botello and Gabrielino consultant José María Zalvidea, who indicated that Yaanga was originally located adjacent to the original site of the Los Angeles plaza (Morris et al. 2016:112).

After the settlement of Los Angeles in 1781, Yaanga faced many new challenges because of its proximity to the new city. The history of the indigenous inhabitants after the incorporation of the city of Los Angeles is one of forced relocation and adaptation. The Native Americans who left the newly secularized mission lands and came to Los Angeles attempted to resettle near the original location of Yaanga, choosing a location near First and Los Angeles Streets called Rancheria de Los Poblanos. This rancheria existed for approximately 10 years, between 1826 and 1836, after which the indigenous population was again forced to relocate, to a plot of land near Commercial and Alameda Streets (Morris et al. 2016).

This rancheria existed for approximately another 10 years, between 1836 and 1845, during which nearby land owners attempted to forcibly relocate them to obtain more land for agricultural use. When they were finally successful, the Native American community was once again forced to relocate even further east, across the Los Angeles River to a site called Pueblito, which itself was razed in 1847, at which time legislation was passed to require the indigenous population to live in dispersed settlements or with their employers throughout the city. Other indigenous villages and community sites were present throughout the city concurrently with Rancheria de los Poblanos, including numerous smaller settlements along Commercial Street, and another Rancheria, Rancheria de los Pipimares, within downtown Los Angeles along 7th Street.

## **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 Rodríguez Cabrillo stopped in 1542 at present-day San Diego Bay. With his crew, Cabrillo explored the shorelines of present Catalina Island as well as San Pedro and Santa Monica bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno’s crew also landed on Santa Catalina Island and at San Pedro and Santa Monica bays, giving each location its long-standing name. The Spanish crown laid claim to California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1886:96–99; Gumprecht 2001:35).

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

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father 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, Friar 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 Californios' resolve against American rule, emboldening them to continue the offensive in later battles at Dominguez Field and in San Gabriel (Beattie 1942). This early skirmish was not a sign of things to come, and the Americans were ultimately the victors of this 2-year war. The Mexican–American

War officially ended with the Treaty of Guadalupe Hidalgo in 1848, which resulted in the annexation of California and much of the present-day southwest, ushering California into its American period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941).

On April 4, 1850, only 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. The County of Los Angeles 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. The city at this time was bordered on the north by the Los Felis and the San Rafael Land grant 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 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: 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 alongside 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 in size 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 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).

## **HISTORICAL DEVELOPMENT OF THE PROJECT SITE**

When the City was incorporated in 1849, the project site was situated within foothills on the western portion of the City’s boundary. Much of the surrounding land, below and to the west of the project site, was either agricultural and ranch land or parceled as donation lots (Figure 8). These were former pueblo lands, which remained undeveloped and, as such, brought no revenue to the city. These parcels would be donated to anyone who could put the land under cultivation and make improvements of \$100. By transferring these lands to a private owner, they would then be taxable and, therefore, bring important and necessary revenue to the city (Guinn 1915:273). During this time, the project site was still very much on the periphery of the urbanized portions of the city (Figure 9 and Figure 10).

Development began to increase in the City in the latter half of the nineteenth century. With the completion of the railroad, sparking what turned into a population boom in the 1880s, developments expanded from the historic core, especially to the west. Through the 1890s and into the early twentieth century, the city annexed new lands, and the large lots originally surveyed in the 1850s were subdivided and developed into city blocks with residential buildings erected throughout the project site. In 1867, Prudent Beaudry and Stephen Mott purchased the majority of Bunker Hill, splitting it between them (Loukaitou-Sideris and Sansbury 1996). They invested heavily in developing the promontory, with Beaudry forming the Canal and Reservoir Company and building his own water system when the city denied his request for the construction of water infrastructure (Creason 2015). During the 1880s, the neighborhood grew rapidly, becoming the site of one of the most affluent neighborhoods of the city, within a tract originally titled the Mott Tract (Figure 11 through Figure 13). Homes were built as copies of the Queen Anne- and Eastlake-style mansions favored by the wealthy, and the value of the area only increased with the opening of a streetcar line in 1885 that ran along 2nd Street (Pugsley 1977).

With the completion of two separate funicular railways, Angels Flight and Court Flight, in the beginning of the twentieth century to ease travel up the steep hills of the area, the area’s prosperity only grew (Paluszek 2018). This, however, was only true for those areas on the upper reaches of the hills. For the neighborhoods located at the base of Bunker Hill, their degradation began before 1910, with the construction of numerous tenement houses and apartments. At the same time, businesses grew in numbers to the east, forming the commercial center of Los Angeles, which soon became the entertainment center, beginning in 1910 (Loukaitou-Sideris and Sansbury 1996). This growth spurred the end of the area’s affluence, for as downtown Los Angeles expanded the commercial and industrial sections, creating an increase in dense local working populations and, with the developments in places like Beverly Hills and Pasadena, the wealthy resident began to migrate to these new enclaves (Loukaitou-Sideris and Sansbury 1996). As properties were sold, these former mansions were subdivided into single rooms to be rented, usually single men, and, throughout the 1920s and 1930s, the area was converted to tenements and commercial buildings (Loukaitou-Sideris and Sansbury 1996).

In 1933, the newly formed Home Owners Loan Corporation was formed and in their assessment of Los Angeles neighborhoods, the area was assessed as “blighted.” Specifically, the report for section D37 of the city is described as: “[having] been through all the phases of decline and is now thoroughly blighted. Subversive racial elements predominate; dilapidation and squalor are everywhere in evidence. It is a slum area and one of the city’s melting pots” (Home Owners Loan Corporation 1939). With a primarily Asian-American and Latino community, beginning in 1959 it became one of the sites of a massive redevelopment project of the Los Angeles Community Redevelopment Agency after World War II (Paluszek 2018). This redevelopment dramatically transformed the project site and surroundings as buildings were razed and city blocks altered to accommodate construction of some of the city’s first skyscrapers. This development further shifted the character of the adjacent neighborhoods away from residential developments, even for multi-family properties, and toward more commercial uses. Developments continued within the project site throughout the remainder of the twentieth century, as larger buildings and parking lots replaced the former buildings, resulting in the present-day appearance.

## RESULTS

### CHRIS Records Search

#### *Previously Conducted Cultural Resources Studies*

The CHRIS records search indicated that 71 cultural resources studies have been previously conducted within a 0.5-mile radius of the project site (Table 1). None of these studies were conducted directly within the project site. Previous studies in the soils underlying existing developments were inspected (e.g., through archaeological testing, data recovery, or monitoring during construction) and archaeological materials affiliated with Native Americans were not identified are useful for identifying areas of reduced sensitivity (see above, Sensitivity Assessment). Brief inspection of the study types identified in the data tables on-file with the SCCIC suggests that at least 41 of the previous studies conducted within a 0.5-mile radius of the project site very likely included some form of sub-surface excavation that was subject to archaeological fieldwork. The scope of the current study did not include systematic inspection of all previous studies to confirm the methods and assess negative results, but these data suggest a reasonable sample of locations have been inspected. It should be noted that the earliest of these studies was conducted in 1974, at which point the entire search radius had been urbanized and nearly all surfaces were subject to some form of alteration or disturbance. Therefore, studies with negative results do not necessarily reflect reduced sensitivity for tribal cultural resources because of a lack of prior use by Native Americans and instead reflect a lack of preservation potential resulting from natural and/or anthropogenic processes.

**Table 1. Previously Conducted Cultural Resource Studies within a 0.5-Mile Radius of the Project Site**

Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-00110	<i>Report on the Archaeological Resources of Job No. 4059 for Ultrasonics, Inc.</i>	Clellow, William C. Jr. (University of California, Los Angeles Archaeological Survey)	1974	Archaeological, Field study	Outside
LA-00483	<i>Archaeological Resources Survey the Proposed Downtown People Mover Project Corridor Area</i>	Greenwood, Roberta S. (Greenwood and Associates)	1978	Literature search	Outside
LA-01577	<i>Identification Study for Cultural Resources Within Proposed Metro Rail Subway Station Locations in Metropolitan Los Angeles, Ca</i>	Anonymous (Westec Services, Inc.)	1985	Literature search	Outside



Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-01578	<i>Technical Report Archaeological Resources Los Angeles Rapid Rail Transit Project Draft Environmental Impact Statement and Environmental Impact Report</i>	Anonymous (Westec Services, Inc.)	1983	Archaeological, Field study	Outside
LA-01642	<i>Los Angeles Downtown People Mover Program Archaeological Resources Survey: Phase II Evaluation of Significance and Recommendations for Future Actions</i>	Costello, Julia G. (Science Applications Inc.)	1980	Literature search	Outside
LA-01643	<i>Los Angeles Downtown People Mover Program Archaeological Resources Survey Phase 3</i>	Costello, Julia G. (Science Applications Inc.)	1981	Archaeological, Field study	Outside
LA-01741	<i>Archaeological and Paleontological Reconnaissance and Impact Evaluation of the Central City West Study Area Los Angeles, California</i>	Dillon, Brian D.	1989	Archaeological, Field study	Outside
LA-02028	<i>Draft Environmental Impact Report Bank of America Service Center Los Angeles, California</i>	Clewlow, William C. Jr. (Ultra Systems, Inc.)	1974	Archaeological, Field study	Outside
LA-02768	<i>Draft Environmental Impact Report Central City West Specific Plan</i>	Dillon, Brian D. and Roy Sails	1989	Management, planning	Outside
LA-03103	<i>Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1</i>	Greenwood, Roberta S.	1993	Monitoring	Outside
LA-03496	<i>Draft Environmental Impact Report Transit Corridor Specific Plan Park Mile Specific Plan Amendments</i>	Anonymous	n.d.	Management, planning	Outside
LA-04214	<i>Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R106, Near West Fourth Street and South Hill Street, City and County of Los Angeles</i>	Conkling, Steven W. (LSA Associates, Inc.)	1998	Monitoring	Outside
LA-04215	<i>Results of Cultural Resources Monitoring, L.a. Cellular Cell Site R104, Near West Third Street and South Grand Avenue, City and County of Los Angeles</i>	Conkling, Steven W. (LSA Associates, Inc.)	1998	Monitoring	Outside
LA-04238	<i>Results of Cultural Resources Monitoring, L.a. Cellular Cell Site R107, at the Intersection of West First Street and South Hill Street, City and County of Los Angeles</i>	Conkling, Steven W. (LSA Associates, Inc.)	1998	Monitoring	Outside
LA-04467	<i>Architectural and Historical Review of Broadway Seismic List and National Register Theatrical and Commercial District</i>	Hatheway, Roger G. and Richard Starzak (Roger G. Hatheway & Associates)	1983	Architectural, Historical, Evaluation, Other research	Outside
LA-04834	<i>Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties</i>	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Archaeological, Field study	Outside

Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-04835	<i>Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties</i>	Ashkar, Shahira (Jones & Stokes Associates, Inc.)	1999	Archaeological, Field study	Outside
LA-04836	<i>Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project</i>	Anonymous (Science Applications International Corporation)	2000	Archaeological, Field study	Outside
LA-05093	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 679-11, County of Los Angeles, Ca</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature search	Outside
LA-05098	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 226-01, County of Los Angeles, Ca</i>	Duke, Curt (LSA Associates, Inc.)	1999	Literature search	Outside
LA-05181	<i>Cultural Resource Assessment for AT&amp;T Wireless Services Facility T998, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	2000	Archaeological, Other research	Outside
LA-05413	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 263-02, County of Los Angeles, Ca</i>	Lapin, Philippe (LSA Associates, Inc.)	2000	Archaeological, Field study	Outside
LA-06362	<i>Finding of Effect on Historic Properties Arroyo Seco Parkway and Four Level Interchange</i>	Borg, Roger (Caltrans District 7)	1994	Other research	Outside
LA-06396	<i>An Archaeological Assessment of the Proposed Verizon Wireless Grand Avenue, East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles County, California 90071</i>	Anonymous (Tetra Tech, Inc.)	2001	Literature search	Outside
LA-06398	<i>Historic Study Report for the Proposed Gratts New Primary Center</i>	Unknown (Jones & Stokes)	2001	Archaeological, Field study	Outside
LA-06415	<i>Cultural Resource Assessment Cingular Wireless Facility No. Sm 104-04</i>	Duke, Curt (LSA Associates, Inc.)	2001	Literature search	Outside
LA-06424	<i>Cultural Resource Assessment Cingular Wireless Facility No. Sm 140-01 Los Angeles County, California</i>	Duke, Curt	2002	Literature search	Outside
LA-06435	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La679-11, County of Los Angeles, California</i>	Duke, Curt (LSA Associates, Inc.)	1999	Architectural, Historical, Evaluation	Outside
LA-06440	<i>Proposed Verizon Wireless Facility: Pershing Square (99800089) in the City and County of Los Angeles, California</i>	Mason, Roger D. (Chambers Group, Inc.)	2001	Literature search	Outside
LA-06463	<i>A Section 106 Historic Preservation Review of the Proposed Verizon Wireless Grand Avenue East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles, Ca 90071</i>	Anonymous	2002	Archaeological, Evaluation, Field study	Outside

<b>Report Number</b>	<b>Title of Study</b>	<b>Author (Affiliation)</b>	<b>Year</b>	<b>Study Type</b>	<b>Proximity to Project Site</b>
LA-07351	<i>A Phase I Archaeological Study for the Proposed Hartford Avenue Apartments Project [440-458 Hartford Avenue] City of Los Angeles, County of Los Angeles, California</i>	Wlodarski, Robert J. (Historical, Environmental, Archaeological, Research Team)	2005	Archaeological, Field study	Outside
LA-07360	<i>A Phase I Archaeological Study for the Proposed Emerald Terrace Apartments Project [208-232 Lucas Avenue, 273-279 Emerald Street, 1345-1353 Emerald Drive] City of Los Angeles, County of Los Angeles, California</i>	Wlodarski, Robert J. (Historic, Environmental, Archaeological, Research Team)	2004	Archaeological, Field study	Outside
LA-07527	<i>Caltrans Statewide Historic Bridge Inventory Update Tunnels</i>	Feldman, Jessica B., Lemon, David, and Hope, Andrew (Myra L. Frank & Associates, Inc, CalTrans)	2006	Architectural, Historical, Evaluation	Outside
LA-07550	<i>Archaeological and Paleontological Monitoring Report for the Grand Avenue Realignment Project, Los Angeles, California</i>	Mirro, Vanessa A. and Sherri Gust (Cogstone Resource Management, Inc.)	2004	Monitoring	Outside
LA-07733	<i>Cultural Resources Records Search Results and Site Visit for Cingular Wireless Candidate Lsanca0739 (811 Wilshire), 811 Wilshire Boulevard, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2006	Archaeological, Field study	Outside
LA-07774	<i>Cultural Resources Records Search Results and Site Visit for Cingular Wireless EI-038-01 (SBC Switch-downtown La), 433 South Olive Street &amp; 434 Grand Avenue (aka 420 South Grand Avenue), Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2005	Archaeological, Field study	Outside
LA-07980	<i>Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate La0155a (433 S. Olive Street: AT&amp;T Switch), 433 South Olive Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2006	Archaeological, Evaluation, Field study	Outside
LA-08017	<i>Cultural Resources Investigations: the New Gratts Primary Center &amp; Early Childhood Education Center in the City of Los Angeles, Los Angeles County, California</i>	McKenna, Jeanette A.	2004	Archaeological, Field study	Outside
LA-08018	<i>Historic Property Evaluations for Structures Within the New Gratts Primary Center &amp; Early Childhood Education Center Project Area in the City of Los Angeles, Los Angeles County, California</i>	McKenna, Jeanette A.	2004	Archaeological, Field study	Outside
LA-08026	<i>Treatment Plan for Potential Cultural Resources Within Proposed Metro Rail Subway Station Locations in Metropolitan Los Angeles, California</i>	Carrico, Richard L. (Westec Services, Inc.)	1985	Management, planning, Other research	Outside

Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-08252	<i>Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch</i>	Snyder, John W., Mikesell, Stephen, and Pierzinski (Caltrans)	1986	Architectural, Historical, Evaluation, Other research	Outside
LA-08754	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate La03104k (California Jewelry), 607 South Hill Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne H. and Kathleen A. Crawford (Michael Brandman Associates)	2007	Archaeological, Field study	Outside
LA-09283	<i>A Phase I Cultural Resource Assessment and Vertebrate Paleontologic Assessment for the Los Angeles Department of Water and Power District Cooling Plant and Distribution System Project in the City of Los Angeles, Los Angeles County, California</i>	Ramirez, Robert S. (ArchaeoPaleo Resource Management, Inc.)	2007	Archaeological, Field study	Outside
LA-09429	<i>An Architectural Evaluation of the three buildings located at 217-221 West 4th St., 350-354 S. Broadway, and 356-364 S. Broadway, in the City of Los Angeles, Los Angeles County, California</i>	McKenna, Jeanette	2008	Archaeological, Field study, Other research	Outside
LA-09774	<i>Verizon Cellular Communications Tower Site, Los Angeles Superior Court BDAS, 111 N. Hill Street (APN: 5161-004-906), Los Angeles, Ca 90012</i>	Hollins, Jeremy (URS)	2009	Architectural, Historical, Evaluation	Outside
LA-09809	<i>Cultural Resources Study of the LA Self Storage Project, Royal Street Communications Site No. LA3833A, 1000 W. 6th Street, Los Angeles, CA</i>	Dana E. Supernowicz (Historic Resource Associates)	2009	Archaeological, Field study	Outside
LA-10290	<i>Cultural Resources Records Search and Site Visit Results for Clearwire Candidate CA-LOS6191A/CA6538 (Bonaventure), West 6th Street, Los Angeles, California</i>	Bonner, Wayne H. (Michael Brandman Associates)	2009	Archaeological, Field study, Other research	Outside
LA-10360	<i>Archaeological Monitoring Report Central Los Angeles Area High School No. 10 Project, Central Los Angeles Area High School No. 10 Project City of Los Angeles, Los Angeles County, California</i>	Hogan, Michael and Tang, Tom (CRM Tech)	2009	Monitoring	Outside
LA-10507	<i>Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report</i>	Anonymous (Westec Services, Inc.)	1983	Archaeological, Evaluation, Field study, Other research	Outside
LA-10542	<i>Historical Architectural Survey and Evaluation Report and Finding of no Adverse Effect</i>	Grimes, Teresa (Historic Resources Group)	1998	Other research	Outside
LA-10772	<i>Historic Building Survey - Los Angeles Downtown People Mover Program Report for Determination of Eligibility</i>	Anonymous (Myra L. Frank & Associates, Inc.)	1979	Architectural, Historical, Evaluation	Outside

Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-10860	<i>Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan</i>	Robinson, Mark (Jones & Stokes)	2007	Monitoring	Outside
LA-11165	<i>Draft - Environmental Impact Statement, United States General Services Administration, GSA Document Number: ZCA81642/1999 Los Angeles U.S. Courthouse, Los Angeles, California</i>	Carnevale, Mike (Burns & McDonnell)	2001	Management, planning	Outside
LA-11620	<i>Addendum Studies: Historic Building Evaluation and Cultural Resources Investigation: An Investigation and Evaluation of the Properties Between 340-344 S. Broadway and 356-364 S. Broadway, and 217-221 West 4th Street in the City of Los Angeles, Los Angeles</i>	McKenna, Jeanette	2012	Archaeological, Architectural, Historical, Evaluation, Field study	Outside
LA-11649	<i>Evaluation of Proposed Demolition of Stationers Building, 525 South Spring Street, Stationers Annex, 523 South Spring Street on the Spring Street Financial Historic District</i>	Kaplan, David and O'Connor, Pam (Kaplan Chen Kaplan)	2004	Architectural, Historical, Evaluation	Outside
LA-11709	<i>Finding of No Adverse Effect, Source Control Project(s) on State Route 110 and United States Highway 101 at the Four-Level Interchange</i>	Stewart, Noah (California Department of Transportation)	2011	Other research	Outside
LA-11710	<i>Regional Connector Transit Corridor Draft Environmental Impact Statement/ Draft Environmental Impact Report, Appendix Y Cultural Resources- Archaeology</i>	Anonymous (CDM and SWCA)	2011	Management/planning	Outside
LA-11783	<i>Supplemental Finding of No Adverse Effect, Upgrade Bridge Rails in L.A. County on Highway 101</i>	Stewart, Noah and Allison, Noah (California Department of Transportation)	2012	Other research	Outside
LA-11954	<i>Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate LA03XC041 (Angels Flight) 242 South Broadway, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne (Michael Brandman Associates)	2012	Archaeological, Field study	Outside
LA-11992	<i>Findings of No Adverse Effect, Upgrade Bridge Rails in L.A. County on Highway 101</i>	Stewart, Noah (CalTrans)	2009	Other research	Outside
LA-12171	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA03104K (California Jewelry Exchange) 607 South Hill Street, Los Angeles, California</i>	Bonner, Wayne and Crawford, Kathleen (Michael Brandman Associates)	2012	Archaeological, Field study	Outside
LA-12294	<i>Historic American Building Survey: The Trustee Building 340-344 South Broadway, Los Angeles, California 90013</i>	McKenna, Jeannette	2013	Other research	Outside

Report Number	Title of Study	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-12392	<i>Cultural Resources Records Search and Site Visit Results for AT&amp;T Mobility, LLC Candidate EL0038 (SBC Building), 433 Olive Street and 434 South Grand Avenue, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne (EAS)	2013	Archaeological, Field study	Outside
LA-12393	<i>Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02731A (LA424-AT&amp;T (Madison MSC), 633 South Olive Street, Los Angeles, Los Angeles County, California</i>	Bonner, Wayne and Crawford, Kathleen (EAS)	2013	Archaeological, Architectural, Historical, Evaluation, Field study	Outside
LA-12493	<i>Cultural Resource Assessment Verizon Wireless Services Grand Avenue ELA Facility City of Los Angeles, Los Angeles County, California</i>	Fulton, Phil and McLean, Roderic (LSA)	2012	Archaeological, Field study	Outside
LA-12584	<i>Restoration of Historic Streetcar Service in Downtown Los Angeles</i>	Rogers, Leslie (Federal transit Administration)	2013	Archaeological, Architectural, Historical	Outside
LA-12648	<i>Archaeological Monitoring Results: The Los Angeles US Courthouse Los Angeles CA</i>	Wiley, Nancy, Colocho, Connie, and Garrison, Andrew (Scientific Resource Surveys)	2014	Archaeological, Evaluation, Monitoring	Outside
LA-13105	<i>Cultural Resources Records Search and Site Visit Results for AT&amp;T Mobility, LLC Candidate LA0741/CLU5712 (LA Self Storage), 1000 6th Street, Los Angeles, Los Angeles County, California. CASPR No. 3551656508</i>	Bonner, Diane F., Carrie D. Wills, and Kathleen A. Crawford (Environmental Assessment Specialists, Inc.)	2014	Archaeological, Architectural, Historical, Field study	Outside
LA-13141	<i>Cultural Resources Assessment of the Pershing Square Project, Los Angeles, Los Angeles County, California (BCR Consulting Project No. TRF1412)</i>	Brunzell, David (BCR Consulting LLC)	2014	Archaeological, Field study	Outside
LA-13143	<i>Cultural Resources Records Search and Site Visit Results for AT&amp;T Mobility, LLC Candidate LAR091 (Figueroa and 5th Street), 545 South Figueroa Street, Los Angeles, Los Angeles County, California. CASPR: 3551015017</i>	Bonner, Wayne H. and Kathleen A. Crawford (Environmental Assessment Specialists, Inc)	2013	Archaeological, Architectural, Historical, Field study	Outside
LA-13239	<i>Extent of Zanja Madre</i>	Gust, Sherri (Cogstone Resource Management, Inc.)	2017	Other research	Outside

### Previously Recorded Cultural Resources

No archaeological resources affiliated with Native Americans that could potentially be considered tribal cultural resources were identified in the 0.5-mile radius used to conduct the CHRIS records search (Table 2). All of the archaeological resources identified in the records search were affiliated with Historic-period non-Native American artifacts and features.

**Table 2. Previously Recorded Archaeological Resources within a 0.5-Mile Radius of the Project Site**

Primary Number	Trinomial	Time Period	Resource Type	Resource Name	Proximity to Project Site
P-19-002741	CA-LAN-2741H	Historic	Site	L.A. Cellular Site R105	Outside
P-19-004451	–	Historic	Site	Los Angeles Federal Courthouse Site	Outside
P-19-003660	CA-LAN-3660H	Historic	Site	CRM TECH 1031-1H	Outside
P-19-003129	CA-LAN-3129H	Historic	Site	Cogstone Project 02-1018 Grand Avenue	Outside
P-19-100301	–	Historic	Other	L.A. Cellular Site R107	Outside

The nearest archaeological resource with a Native American component on-file with the SCCIC are recorded in two sites and two isolated finds (P-19-000007/H, P-19-001575/H, P-19-004662, and P-19-100515) located in the area between Los Angeles Plaza and Metropolitan Water District (MWD) headquarters building, 1 to 1.3 miles east of the project site, respectively (Table 3).

**Table 3. Previously Recorded Archaeological Resources within a 0.5- to 1.5-Mile Radius of the Project Site**

Primary Number	Trinomial	Time Period	Resource Type	Resource Name	Proximity to Project Site
P-19-00007/H	CA-LAN-7/H	Prehistoric, Historic	Site	–	1 mile east/northeast
P-19-001575/H	CA-LAN-1575/H	Prehistoric, Historic	Site	MR1	1.25 miles east/northeast
P-19-004662	CA-LA-4662	Prehistoric	Isolate (human femur)	DIV13-P-001	1.3 miles east/northeast
P-19-100515	–	Prehistoric, Historic	Isolate (shell fragments)	Placita de Delores Site	1.1 miles east/northeast

Of these four archaeological resources, only P-19-001575/H included multiple items and substantial remains. The site was excavated by archaeologists during construction of the MWD headquarters and was found to consist of several Native American burials and a diverse artifact assemblage preserved beneath and partly intermixed with non-Native American Historic-period deposits and disturbances (Goldberg et al. 1999). By contrast, both P-19-000007/H and P-19-100515 consist of a small number of artifacts with possible but not definitive Native American affiliations, which were identified in the location of Historic-period archaeological sites that were excavated decades prior. P-19-004662 also only includes one artifact that was dated to approximately 3,600 years ago (3640–3560 cal. B.P.).

P-19-100515 consisted only of shell found in 1999 during monitoring for a sewer maintenance project that was in the approximate location of the Placita de Delores Site—a Spanish, Mexican, and early Historic-period archaeological site (P-19-000887H) recorded in 1978 adjacent to the Los Angeles Plaza (Costello and Wilcoxon 1978). The shells were attributed to Native American activity because they were from species known through the archaeological and ethnographic record as having been widely used.

P-19-000007/H was originally recorded in 1951 as a remnant of the original Chinatown, later demolished (mostly) during construction of the Santa Ana Freeway. In 1980, additional artifacts were identified on the periphery of the former site boundary. Included among the machine-cut animal bone and Chinese and English ceramics, were two pieces of ground stone (metate fragment and mano) and one brown Mission ware (Tezon) ceramic sherd (Huey and Romani 1980).

Finally, P-19-004662 was recorded in 2013 as a single human femur radiocarbon dated to approximately 3,600 years ago (3640–3560 cal. B.P.). The bone was identified 19 feet below the road grade (Vignes Street), northeast of Union Station. Based on its condition, isolated nature, and the soil matrix in which it was found, it was interpreted as having been redeposited by the Los Angeles River.

## **Archival Research**

SWCA’s archival research included a review of historical maps for the project site and vicinity and focused on documenting historical modifications to the physical setting and identifying any potential natural or artificial features with relevance to use by Native Americans (e.g., stream courses, vegetation, historical topography, roads, and habitation markers). The project site is located on Bunker Hill, within the original Los Angeles city limits, west of the city’s historic core (Ord 1849). Several maps created in the 1860s and 1870s by the Canal & Reservoir Company (see Figure 12)<sup>2</sup> show the project site across four subdivided parcels owned by an individual with the surname Tiffany. Stevenson’s 1884 map shows the project site across the same four subdivided parcels of the Mott Tract (see Figure 13). “Bird’s-eye” view illustrations of the city made in 1877 (Glover 1877) and another produced in 1929 as a depiction of the city in 1871 (Gores and Women’s University Club L.A. 1929) show the project site in its largely residential area on a promontory extending south from Temple Street (see Figure 9 and Figure 10).

Due to the terrain of the area, development started slow and began as single-family homes spaced between vacant lots, many with attached stables. By 1894, the project site only had three single-family homes with, primarily, other single-family residential homes surrounding it (Figure 14). The nearest non-residential structures were a public school, located just south of 4th Street on Figueroa, and the Los Angeles Woolen Mill and Home Ice Company at Figueroa and 5th Streets, as shown on Sanborn maps of the time. Then, after the turn of the century, there were an increasing number of different property types abutting the project site, including multi-family residences, apartment buildings, and, in the northern end of the project site, was a structure labeled the Roosevelt Tenements, also known as The Roosevelt, or the Vanderbilt Apartments. Just to the south of the project site, at the intersection of 4th Street and Figueroa Street, was another tenement known as The Juanita. Unlike the neighborhoods located on the hills themselves, those below were living in squalor long before the Great Depression began. Sanborn maps show increased development of the project site, with both residential and commercial buildings, until 1963, when all but one of the residential homes—815 W. Fourth Street, located southwest of the project site—had been replaced with either commercial businesses, hotels, or parking lots. By 1970, the single residential home was still present, but all other buildings had been razed and replaced with parking structures resulting in the mass excavation of tons of soil to depths exceeding 30 feet.

## **Sacred Lands File Search**

On February 12, 2019, the NAHC submitted the results of a SLF search. The results were negative but noted that the lack of recorded sites does not indicate the absence of Native American cultural resources and that the CHRIS and SLF are not exhaustive. The NAHC included a list of five Native American Tribal representatives who may have knowledge of cultural resources in or near the project site and recommended

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<sup>2</sup> Dates were not recorded on some of the Canal & Reservoir Company’s early survey maps but can be reliably estimated based on comparison with other dated maps, not all of which are cited here.



they be contacted prior to work (Table 4). 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 SLF results letter is included in Appendix B.

**Table 4. Summary of Native American Individuals and Groups Culturally Affiliated with the Project Site**

<b>Name and Title</b>	<b>Affiliation</b>
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians-Kizh Nation
Anthony Morales, Chairperson	Gabrieleno/Tongva San Gabriel Band of Mission Indians
Charles Alvarez, Chairperson	Gabrielino Tongva Tribe
Sandonne Goad, Chairperson	Gabrielino Tongva Nation
Robert Dorame, Chairperson	Gabrielino Tongva Indians of California Tribal Council

## **AB 52 Notification and Consultation**

As lead agency, the City mailed letters to nine Native American tribes identified by the NAHC and included on the City’s AB 52 Notification List. Letters were sent out to all contacts by December 5, 2018. Table 5 summarizes the results of Native American outreach conducted in compliance with AB 52 (PRC Section 21082.3).

**Table 5. Native American Outreach Results**

<b>Native American Contact</b>	<b>City Planning Consultation Effort</b>	<b>Tribal Response</b>
Gabrielino/Tongva Tribe Linda Candelaria, Co-Chairperson 1199 Avenue of the Stars, Unit 1100 Los Angeles, CA 90067	<b>03/02/2017:</b> Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Nation Sam Dunlap, Cultural Resources Director P.O. Box 86908 Los Angeles, CA 90086	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.
Fernandeño Tataviam Band of Mission Indians Kimia Fatehi 1019 2nd Street San Fernando, CA 91340	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Nation Sandonne Goad, Chairperson 106 1/2 Judge John Aliso St., #231 Los Angeles, CA 90012	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.
Torres Martinez Desert Cahuilla Indians Michael Mirelez, Cultural Resources Coordinator P.O. Box 1160 Thermal, CA 92274	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.

<b>Native American Contact</b>	<b>City Planning Consultation Effort</b>	<b>Tribal Response</b>
Gabrielino/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson P.O. Box 693 San Gabriel, CA 91778	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.
Soboba Band of Luiseño Indians Joseph Ontiveros, Cultural Resources Director P.O. Box 487 San Jacinto, CA 92581	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.
Gabrielino Tongva Indians of California Tribal Council Robert Dorame, Chairperson P.O. Box 490 Bellflower, CA, 90707 Phone: (562) 761-6417 Fax: (562) 761-6417	<b>12/05/2018:</b> 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	<b>12/05/2018:</b> Letter sent by U.S. Mail. <b>12/11/2018:</b> Meeting scheduled for 2/14/2019.	<b>12/10/2018:</b> Request for consultation.
San Fernando Band of Mission Indians John Valenzuela, Chairperson P.O. Box 221838 Newhall, CA 91322	<b>12/05/2018:</b> Letter sent by U.S. Mail.	No response.

The City received a response to the notification letters on December 10, 2018, from Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians–Kizh Nation, who requested consultation due to the project’s location in the tribe’s ancestral land. A telephone conference call was scheduled for February 14, 2019. Consultation with the Gabrieleño Band of Mission Indians–Kizh Nation remains on-going. The notification letters are included here as part of Appendix C. The record of correspondence and other confidential documents submitted during the consultation are included here as part of a confidential appendix (Appendix D).

## **SENSITIVITY ASSESSMENT**

No tribal cultural resources were identified in a CHRIS records search within the project site and a 0.5-mile radius. The SLF records search did not identify any sacred lands or sites in the project site. The closest archaeological sites affiliated with Native Americans indicative of potential tribal cultural resources sensitivity were identified between 1 and 1.3 miles east/northwest of the project site, in the area between the Los Angeles Plaza and MWD Headquarters building. Three of the four resources identified in this area included fewer than five artifacts at each location, and two of them were fragments with expected but unconfirmed Native American affiliation. One of the sites identified at the MWD Headquarters contained Native American burials and other significant remains found intermixed and buried below Historic-period deposits and disturbances from modern development.

The lack of previously identified resources could indicate the location was not intensively used by Native Americans such that material remains were left, or that remains once present have been destroyed, removed, or otherwise not preserved at the location, either because of natural causes (e.g., erosion and flooding) or historical development. Because the project site and most of the surrounding area was developed prior to any archaeological investigation, the lack of previously identified tribal cultural resources is not likely an

accurate indicator of Native American settlement patterns and behaviors, or the likelihood of unidentified resources being present below the surface. SWCA assessed the general settlement patterns by considering physical landscape features commonly associated with the presence of archaeological sites, and references to specific sites described in the ethnographic literature. SWCA then assessed the preservation potential of the project site by considering the existing disturbances in the project site and the likelihood that any tribal cultural resources could remain.

The Gabrielino village known as Yaanga is the closest ethnographically documented Native American community to the project site. Yaanga is estimated to have been located in the area between the Los Angeles plaza and present-day Union Station, between 1 and 1.25 miles east/northeast of the project site. Various locations in the downtown Los Angeles area that were settled by the Gabrielino during the Mexican and early Historic periods were also identified through ethnographic literature review and archival research and include *Ranchería de los Poblanos* (ca. 1826–1836); *Ranchería de los Pipimares* (ca. 1830–1846); unnamed *rancherías* (ca. 1836–1845); and *Pueblito* (1845–1847). These locations are also located more than 0.5 mile away from the project site and situated on a different landform, separated by the hills that delineate the northern edge of the Los Angeles River floodplain.

Prehistoric archaeological sites indicative of seasonal or otherwise temporary habitation are commonly found on relatively shallow slopes and near sources of water. The project site is approximately 1.5 miles west of the Los Angeles River and, as previously mentioned, outside the margin of its floodplain. The project site is situated in an alluvial basin near several streams that formed the Arroyo de los Reyes—a southwest-flowing watercourse that drained the surrounding hills to the north and northwest, emptying into the Los Angeles River. As a tributary of the Los Angeles River, the streams near the project site did not likely provide a perennial source of water but may have supported a favorable habitat for plant resources commonly used by Native Americans. Although stream courses shift periodically, stream courses also influence the location of footpaths and trails, along which artifacts or features (including human burials) are more likely to occur. Generally, such a physical setting—situated at the base of a slope, in a shallow alluvial basin that contained a braided stream with shifting courses—is also more likely to have resulted in any materials deposited on the surface to be buried and preserved. This also fits with the surficial geology mapped for the project site that indicates the sediments were deposited in the last 12,500 years. The general proximity of the project site to a waterway and broad travel corridor has the effect of an overall increase in the sensitivity for unknown tribal cultural resources, at least higher than low background levels. However, additional factors related to preservation of such materials are considered with respect to disturbances from historical and modern development.

The project site is within the western section of the city's original 1849 boundary. Maps and historical accounts characterize the project site and surroundings as uncultivated land, likely due to its natural topography hindering its use for farmland or settlement. An 1877 illustration shows the street alignments had been graded and a single-family residence was constructed nearby, but no other major changes to the landscape. The area surrounding the project site was developed as part of the Mott Tract, which began to be delineated at least by the early 1870s with lots subdivided and sold by the 1880s. The first confirmed buildings constructed within the project site are single-family residences, present by 1894. The project site was subject to continued development until the 1930s, during which time several Historic-period buildings were constructed and demolished. Beginning in 1959, the project site was part of the Bunker Hill Urban Renewal project, which resulted in the mass demolition of buildings and grading of the area, before the construction of commercial buildings or parking structures, both subterranean and above ground. By 1967, the entirety of the project site had been redeveloped with a subterranean parking structure that extended over 30 feet below the surrounding street grade, which necessitated the mass excavation of native soils and any overlying sediments and materials accumulated or deposited during the Historic period. These construction-demolition episodes have clearly compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been present.

It has been demonstrated elsewhere in the downtown portion of Los Angeles that deeply buried archaeological deposits can exist within alluvium below Historic-period disturbances and may also be intermixed with Historic-period debris. Alluvial deposits within the Los Angeles Basin can be massive, extending hundreds of feet below the surface, and may contain sediments deposited before human occupation of North America. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered. Although investigation of the sediments directly within the project site have not been completed, previous geotechnical studies for sites nearby have encountered bedrock between 2 and 25 feet below the surface. This suggests the space in which any native alluvial sediments may be preserved is very small, which further decreases the likelihood for preservation of any tribal cultural resources.

Given these considerations, SWCA finds the overall potential for unidentified tribal cultural resources within the project site is low.

## **CONCLUSIONS**

The CHRIS search identified no previously recorded tribal cultural resources within the project site or 0.5-mile radius. A literature search and archival research identified several former Native American communities located between 0.5 and 1.5 miles to the east-northeast of the project site, near the Los Angeles Plaza, Union Station, and eastern portions of the downtown area. The NAHC's search of the SLF did not identify any sacred lands or sites. AB 52 consultation was initiated with representatives from the Gabrieleño Band of Mission Indians—Kizh Nation. No other tribal parties that received AB 52 notifications responded to the City. Consultation efforts between City Planning and the Gabrieleño Band of Mission Indians-Kizh Nation is on-going, and the results will be included in the project file on record with City Planning.

Ground disturbances for the project will occur during the proposed demolition, site preparation, and grading phases. Specifically, this includes the demolition of the southern portion of the existing building and parking structure at 4th and Flower Streets and the grading for the new subterranean parking. Grading is estimated to require up to 30 feet of excavation below the surrounding street elevation that will extend into the natural bedrock. SWCA assessed the potential for an unidentified tribal cultural resource to be present below the surface that could be encountered during the proposed ground disturbing activities. Although the location with a shallow alluvial basin near one or more braided streams would have provided a setting that would have been generally favorable for Native American use, prehistorically and during the Historic period, the excavation for the existing subterranean parking lot would have destroyed any physical remains that may have been present. As a result, the potential for unidentified tribal cultural resources within the project site is found to be low.

The project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, 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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- n.d.-a *Canal & Reservoir Company - Lots 500-511*. [Map] Huntington Library, Solano-Reeve Collection, Unique Digital Identifier 314141.
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**Appendix A.  
Report Figures**

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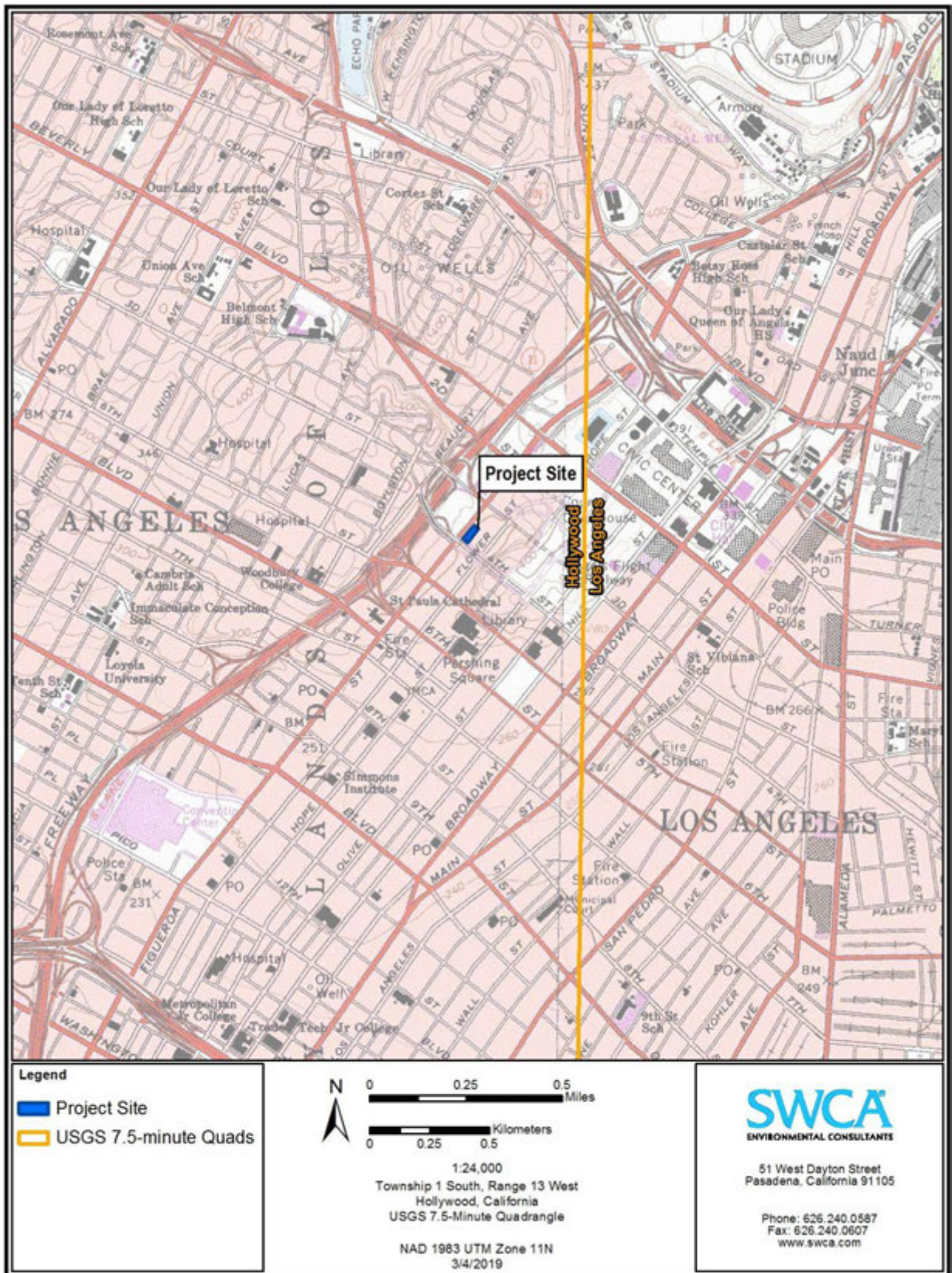


Figure 1. Project site plotted on a USGS, Hollywood, California, 7.5-minute topographic quadrangles.



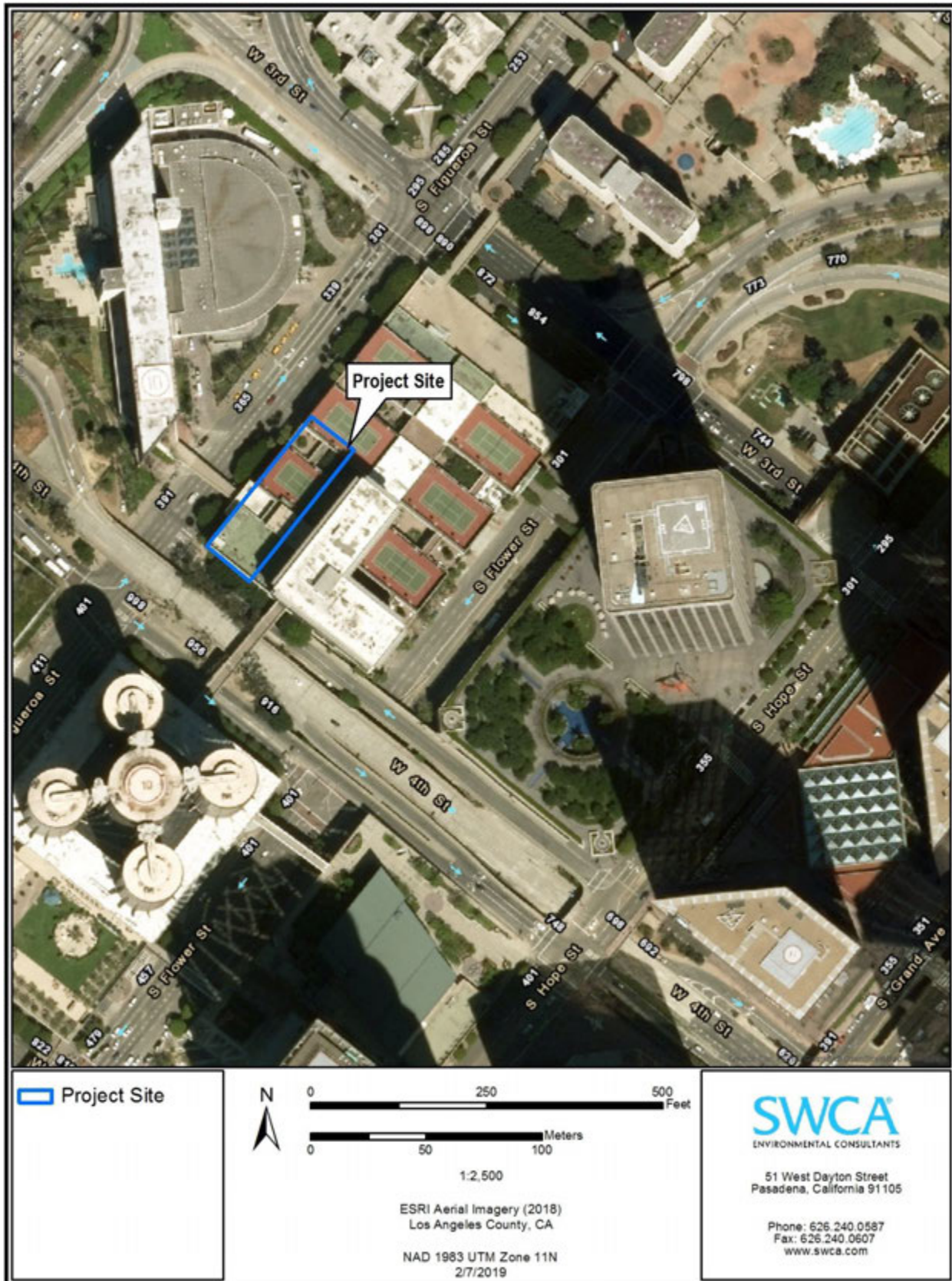


Figure 2. Project site on a 2018 aerial and street map.

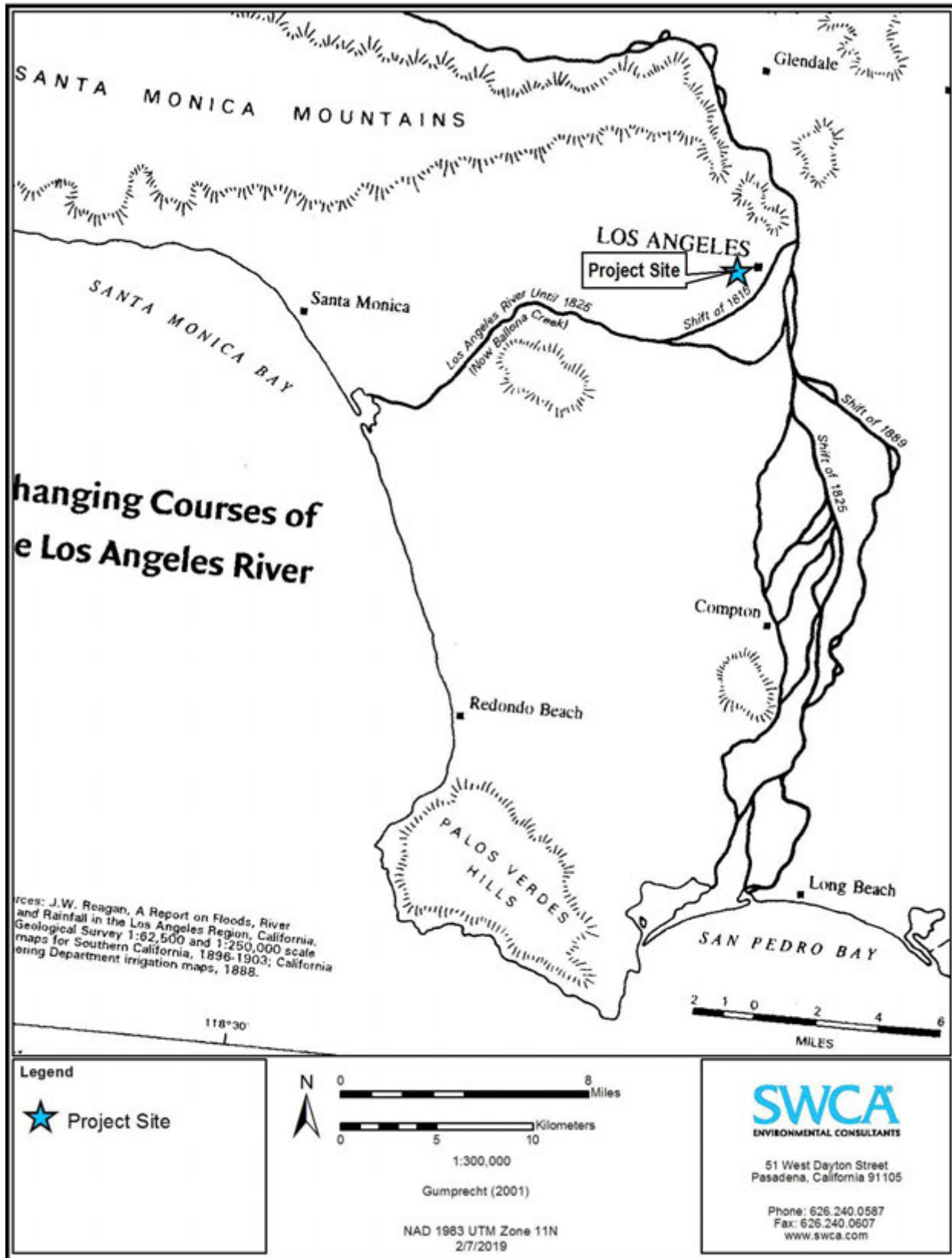


Figure 3. Shifting courses of the Los Angeles River channel, as plotted by Gumprecht (2001:140).

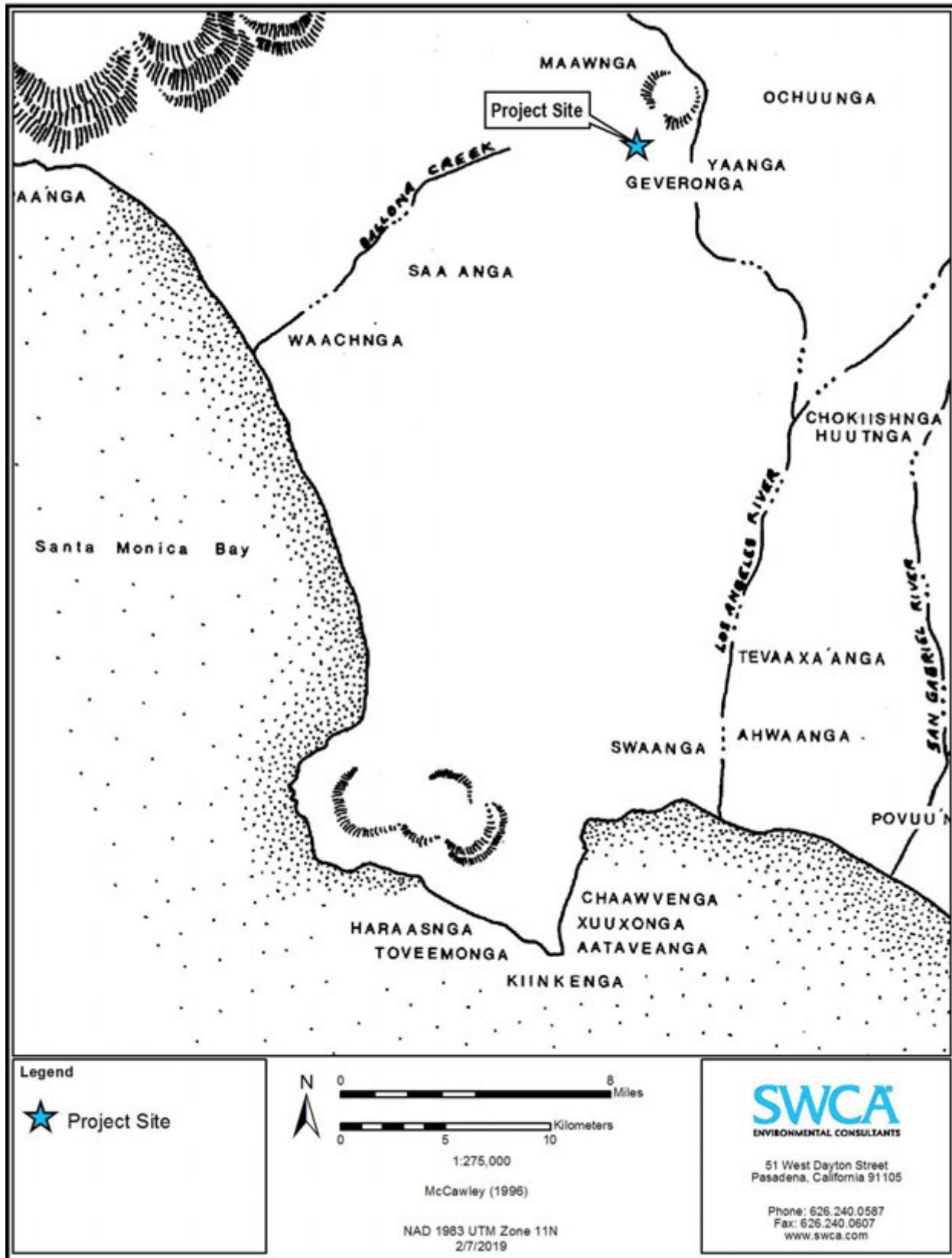


Figure 4. Project site plotted on McCawley's (1996:36) map of villages cited in Gabrielino ethnographic sources.

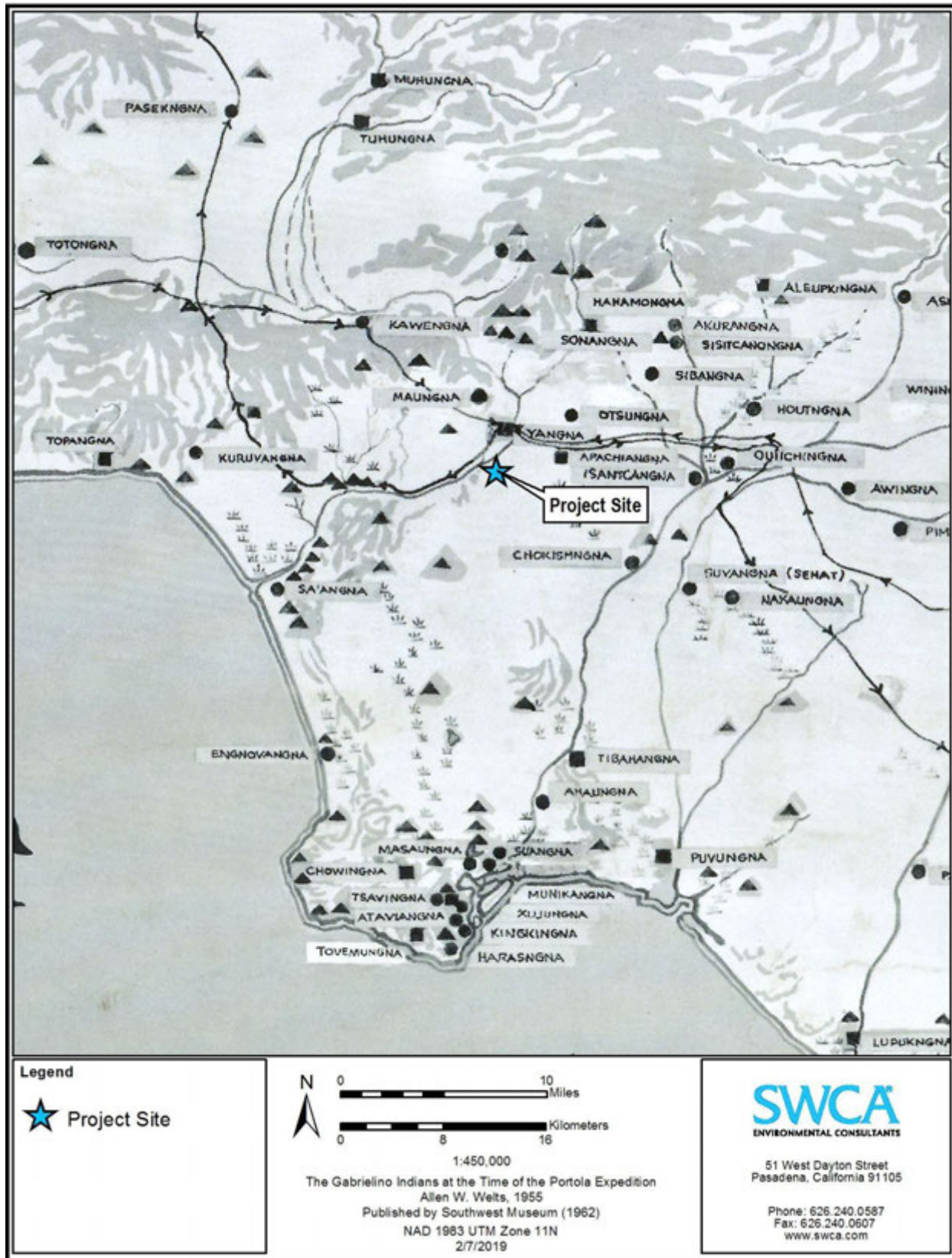


Figure 5. Project site plotted on a map of Native American and historical sites in the Los Angeles Basin, published by the Southwest Museum (1962) and re-printed in Johnston (1962).

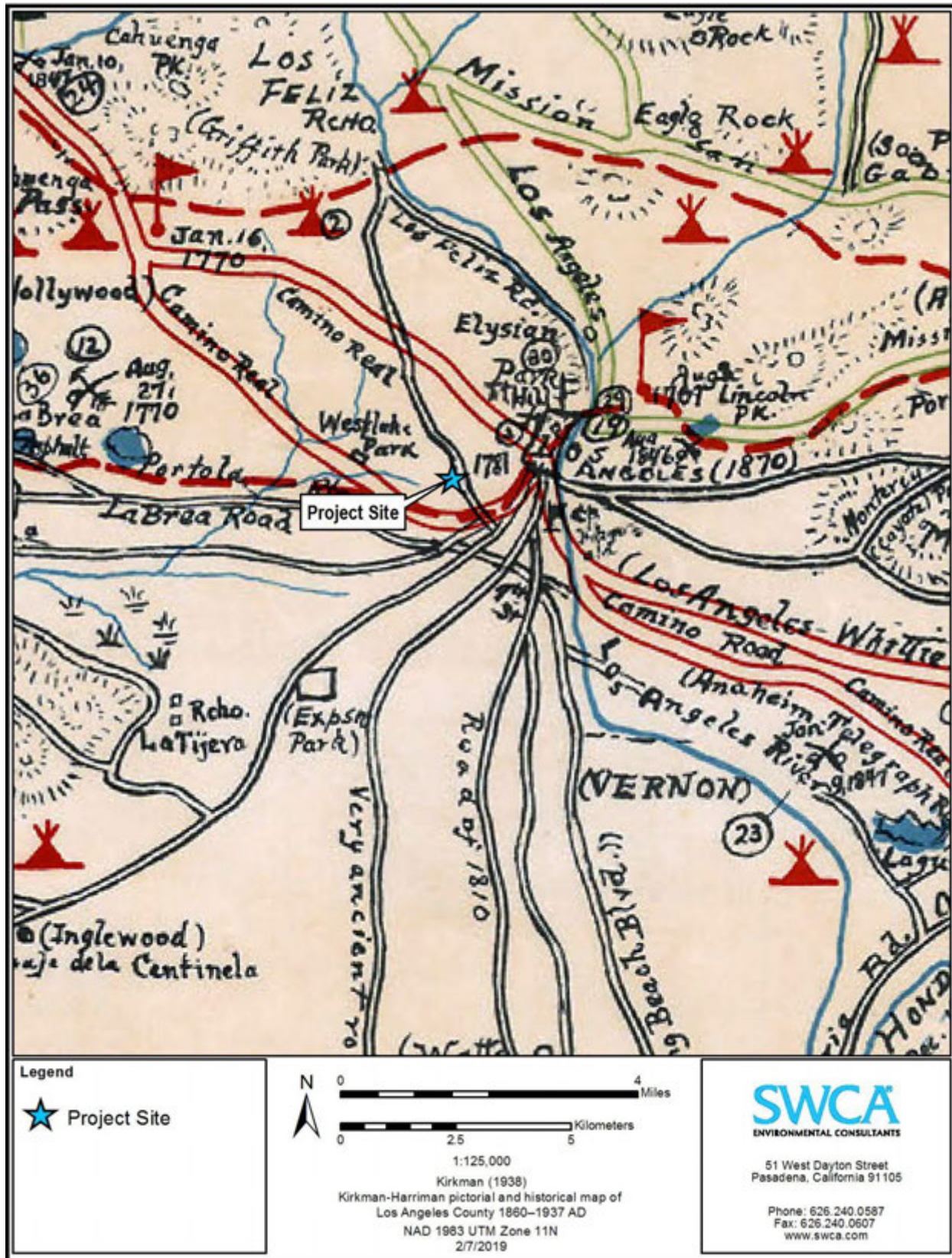


Figure 6. Project site plotted on the Kirkman-Harriman map (Kirkman 1938).

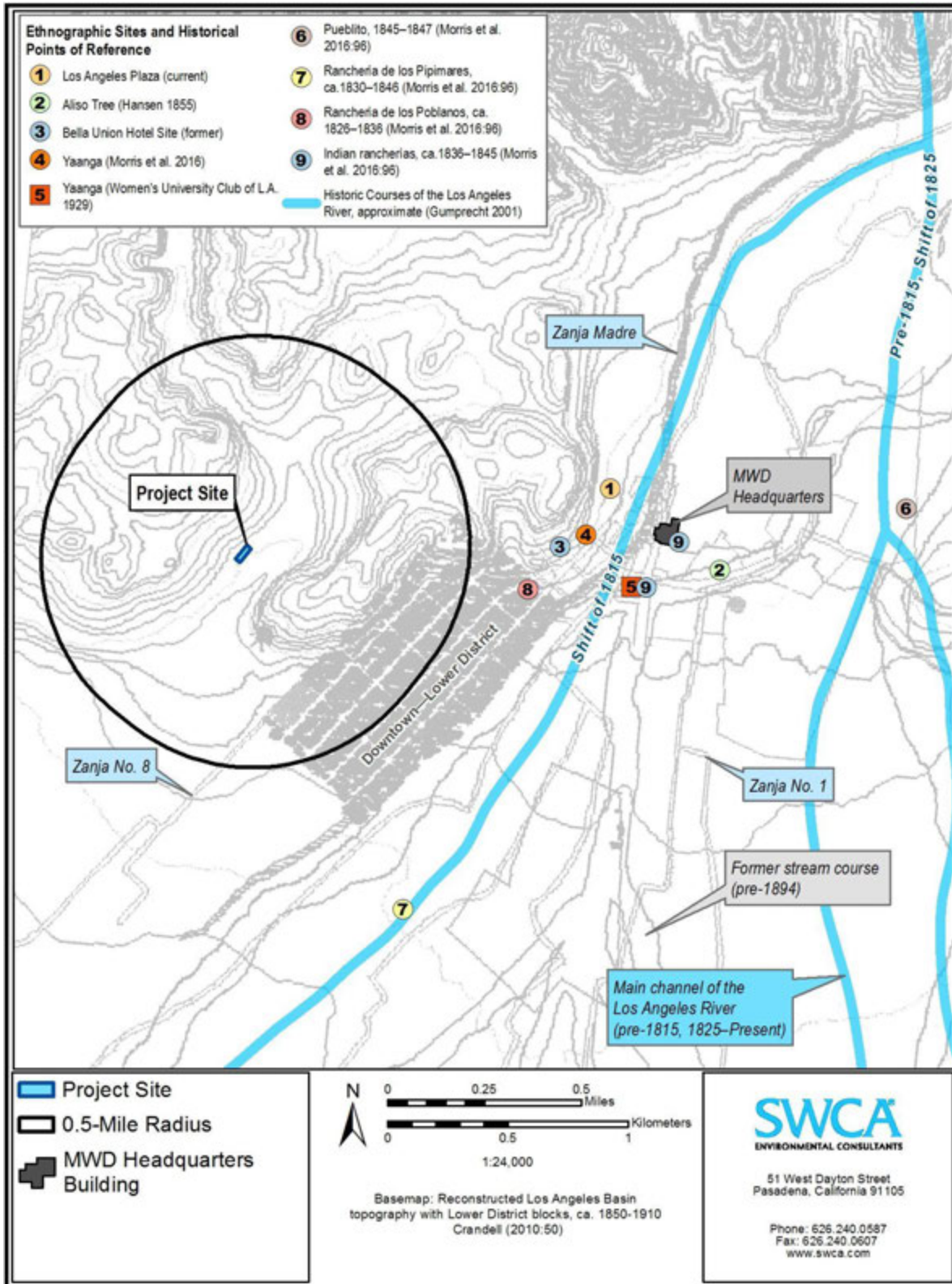


Figure 7. Historical reference points associated with Gabrielino settlement in the downtown Los Angeles area. The base map is a reconstruction of the late nineteenth century topography (gray contours) that includes former stream courses, irrigation channels (zanjas), and parcels comprising the downtown “Lower District.” Sources are indicated in the legend and footer.

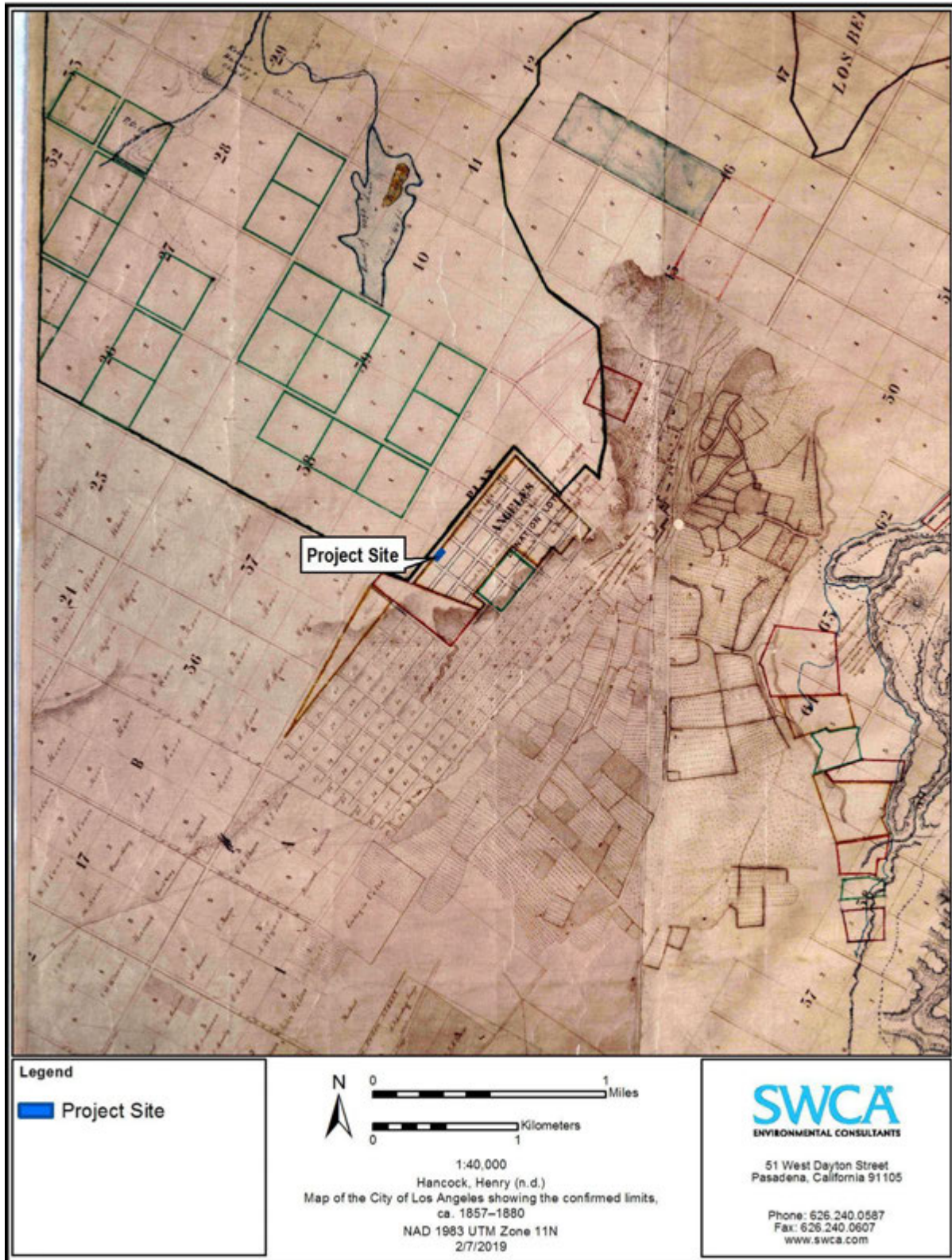


Figure 8. Project site shown on an appended draft of Hancock's ca. 1857 map (Hancock n.d.), based on Ord's (1849) original map of the City and later updated with land owners and subdivisions. In this version, created in the late 1860s, street extensions and lots are delineated in the vicinity of the project site, between the historic core and sections 37-40.



Figure 9. At the time of this illustration by E. S. Glover in 1877 (Glover 1877), the project site along Grasshopper Street was between 3rd and 4th Streets (blue arrow); view facing southwest from Mount Lookout (between Chavez and Cemetery Ravines). The stream illustrated near the project site is the Arroyo de los Reyes.

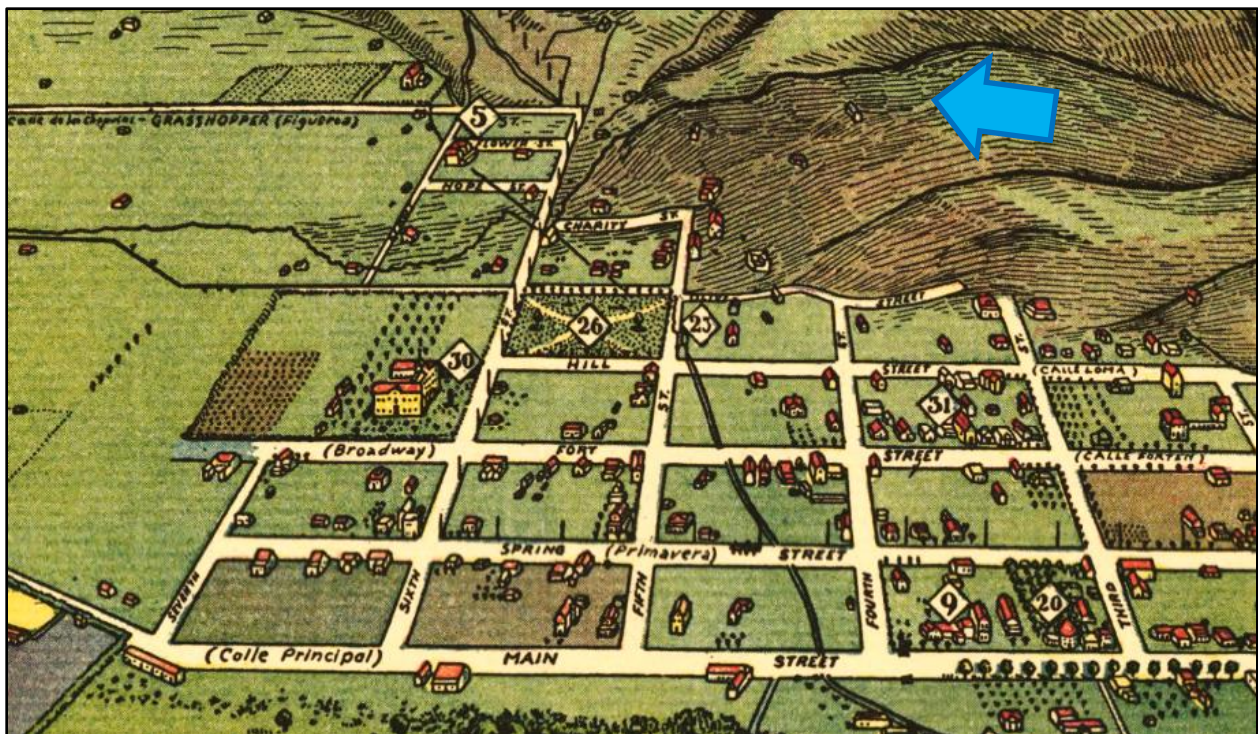


Figure 10. Created in 1929 as a depiction of the city, ca. 1871, the project site (red arrow) is shown within the hills on the outskirts of the platted city blocks (Gores and Women's University Club L.A. 1929); view facing northwest. The illustration was likely based on earlier maps made by Ord (1849) and Hancock's update to the Ord map (Hancock et al. 1857).



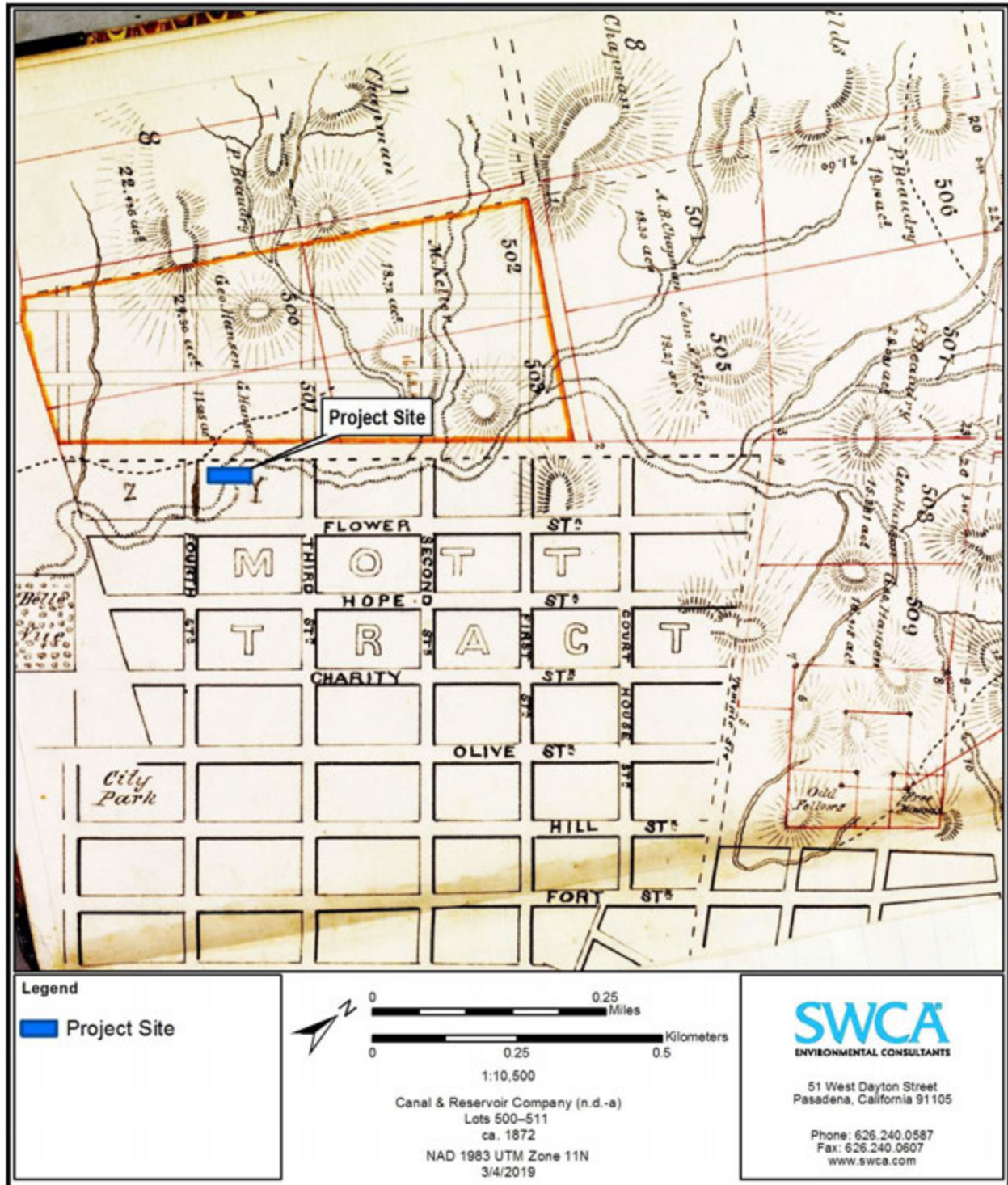


Figure 11. Project site plotted on an early survey map (ca. 1869) prepared by the Canal & Reservoir Company (n.d.-a). The multiple courses plotted here formed what was known as the Arroyo de los Reyes, a tributary of the Los Angeles River.

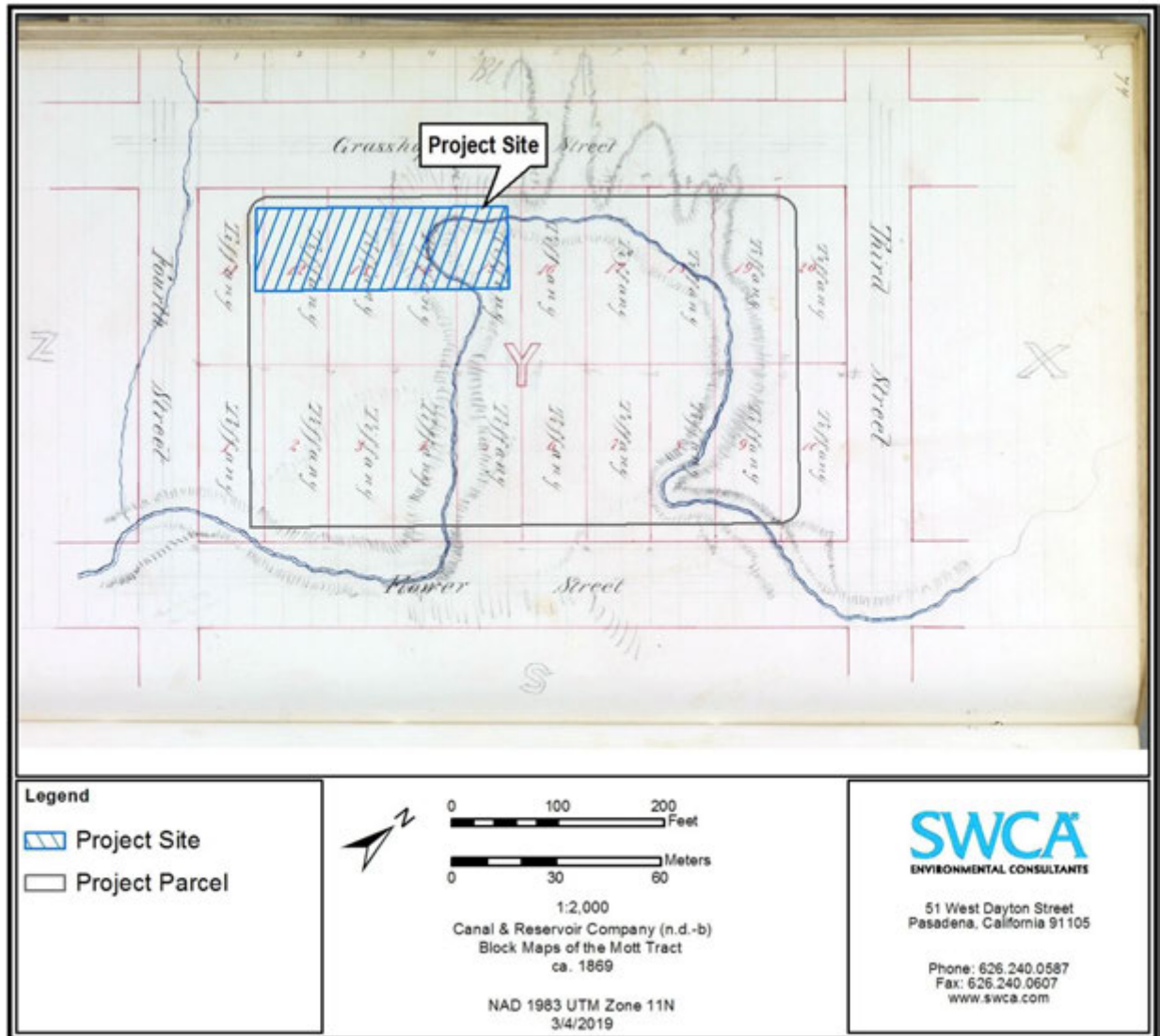


Figure 12. Survey map drawn around 1869 by the Canal & Reservoir Company, showing the project site within Block Y of the Mott Tract (Canal & Reservoir Company n.d.-b). The meandering stream course is the Arroyo de los Reyes.

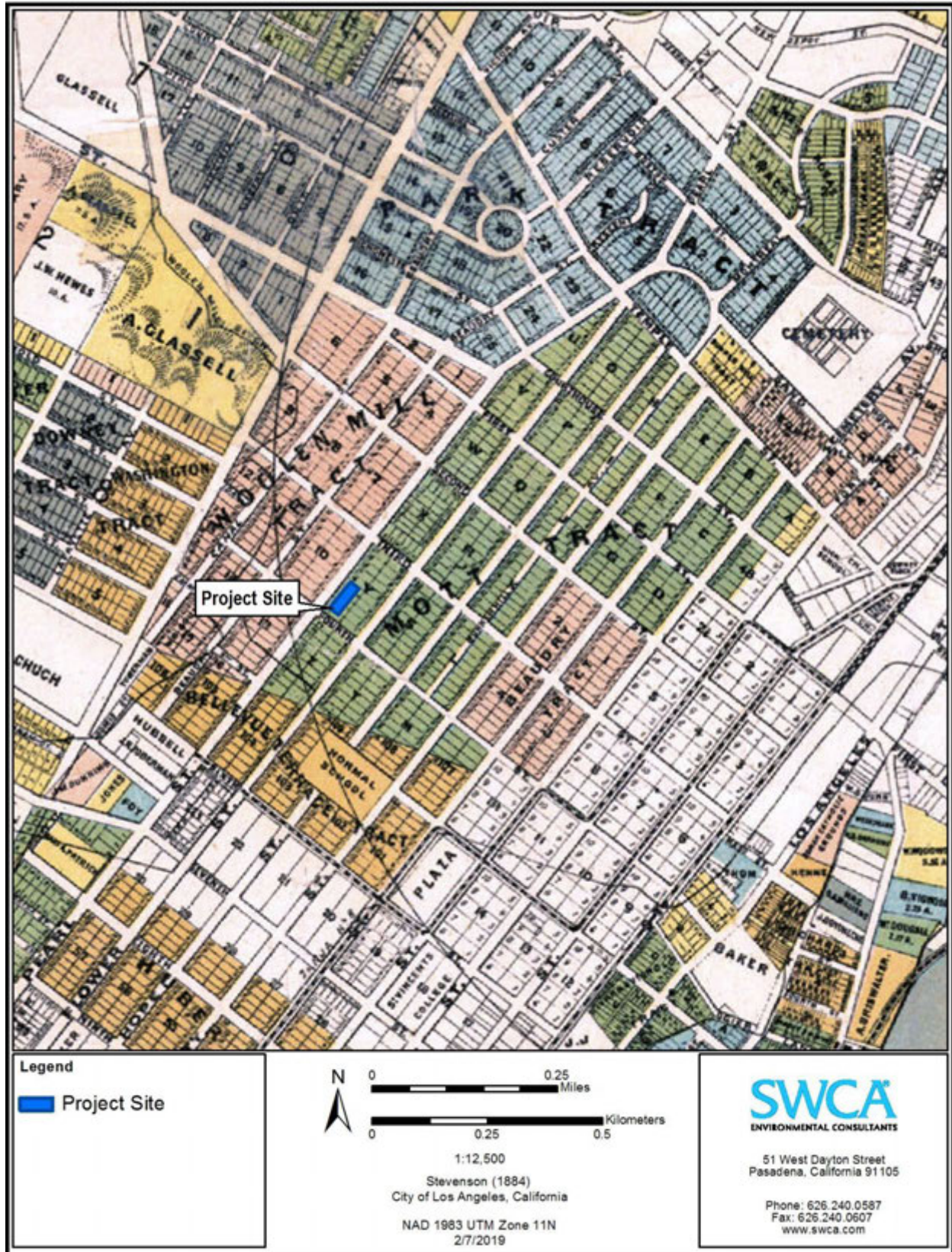


Figure 13. Project site shown within the Mott Tract on Stevenson's 1884 real estate map.



Figure 14. Project site plotted on an 1894 USGS, Los Angeles, California, 7.5-minute topographic quadrangles.

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**Appendix B.  
Native American Heritage Commission  
Sacred Lands File Search**

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



February 12, 2019

Chris Millington  
SWCA

VIA Email to: [cmillington@swca.com](mailto:cmillington@swca.com)

RE: 350 S Figueroa Street Development Project, Los Angeles County

Dear Mr. Millington:

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

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

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: [steven.quinn@nahc.ca.gov](mailto:steven.quinn@nahc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Steven Quinn".

Steven Quinn  
Associate Governmental Program Analyst

Attachment



**Native American Heritage Commission  
Native American Contact List  
Los Angeles County  
2/12/2019**

***Gabrieleno Band of Mission  
Indians - Kizh Nation***

Andrew Salas, Chairperson  
P.O. Box 393  
Covina, CA, 91723  
Phone: (626) 926 - 4131  
admin@gabrielenoindians.org

Gabrieleno

***Gabrieleno/Tongva San Gabriel  
Band of Mission Indians***

Anthony Morales, Chairperson  
P.O. Box 693  
San Gabriel, CA, 91778  
Phone: (626) 483 - 3564  
Fax: (626) 286-1262  
GTTribalcouncil@aol.com

Gabrieleno

***Gabrielino /Tongva Nation***

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

Gabrielino

***Gabrielino Tongva Indians of  
California Tribal Council***

Robert Dorame, Chairperson  
P.O. Box 490  
Bellflower, CA, 90707  
Phone: (562) 761 - 6417  
Fax: (562) 761-6417  
gtongva@gmail.com

Gabrielino

***Gabrielino-Tongva Tribe***

Charles Alvarez,  
23454 Vanowen Street  
West Hills, CA, 91307  
Phone: (310) 403 - 6048  
roadkingcharles@aol.com

Gabrielino

This list is current only as of the date of this document. 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 Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed 350 S Figueroa Street Development Project, Los Angeles County.

**Appendix C.  
Non-Confidential Native American Coordination Documents**

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**City of Los Angeles  
Department of City Planning**

**Affidavit of Mailing**

**Case Number: ENV-2018-2700-EAF**

*This Affidavit concerns the NAHC Tribal Consultation Letter.*

I,     Maria Reyes    , certify that I am an employee of the City of Los Angeles, and on     December 5, 2018    , mailed, postage prepaid, to the applicable 5 California Native American Tribes parties, as indicated below, on the case indicated above, a true copy of which is attached:

**NAHC Tribal Consultation Letter**

**Check Recipients Below/ Certified Mail# (CM):**

- Fernandño Tataviam Band of Mission Indians/ CM# 7017 1450 0000 8443-6822
- Gabrieleño Band of Mission Indians–Kizh Nation / CM# 7017 1450 0000 8443-6839
- Gabrielino Tongva Indians of California Tribal Council/CM# 7017 1450 0000 8443-6846
- Gabrielino/Tongva Nation (Sam Dunlap) /CM# 7017 1450 0000 8443-6853
- Gabrielino/Tongva Nation (Sandonne Goad) /CM# 7017 1450 0000 8443-6860
- Gabrielino/Tongva San Gabriel Band of Mission Indians /CM# 7017 1450 0000 8443-6877
- Gabrielino-Tongva Tribe (Charles Alvarez) /CM# 7017 1450 0000 8443-6884
- San Fernando Band of Mission Indians /CM# 7017 1450 0000 8443-6891
- Soboba Band of Luiseño Indians /CM# 7017 1450 0000 8443-6907
- Torres Martinez Desert Cahuilla Indians /CM# 7017 1450 0000 8443-6914

Maria Reyes  
Staff Signature

**DEPARTMENT OF  
CITY PLANNING**

**CITY PLANNING COMMISSION**

SAMANTHA MILLMAN  
PRESIDENT

VAHID KHORSAND  
VICE-PRESIDENT

DAVID H. J. AMBROZ  
CAROLINE CHOE

RENEE DAKE WILSON

KAREN MACK  
MARC MITCHELL  
VERONICA PADILLA-CAMPOS  
DANA M. PERLMAN

ROCKY WILES  
COMMISSION OFFICE MANAGER  
(213) 978-1300

**CITY OF LOS ANGELES  
CALIFORNIA**



ERIC GARCETTI  
MAYOR

**EXECUTIVE OFFICES**  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP  
DIRECTOR  
(213) 978-1271

KEVIN J. KELLER, AICP  
EXECUTIVE OFFICER  
(213) 978-1272

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR  
(213) 978-1274

<http://planning.lacity.org>

December 5, 2018

Case No.: ENV-2018-2700-EAF  
Project Address: 350 South Figueroa Street  
Community Plan: Central City  
Specific Plan Area: Bunker Hill Specific Plan

Dear Tribal Representative:

This letter is to inform you that the Los Angeles Department of City Planning is reviewing the following proposed project:

The demolition of approximately 29,500 square feet of commercial floor area and part of an existing parking structure for the construction of a new 41-story multi-family tower with up to 570 residential dwelling units located at the northwest corner of West 4<sup>th</sup> Street and Figueroa Street in the Bunker Hill Specific Plan area. The project will be approximately 925,000 square feet of floor area and proposes a height not to exceed 480 feet.

The project will be located within a 29,228 square-foot area that is currently developed with three levels of above grade and three levels of subterranean parking. The subterranean parking currently reaches a depth of approximately 28.5 feet. The project will demolish the existing structures and grade an additional 30,000 cubic yards of earth to strengthen the footing and rebuild the demolished portion of the parking structure in place.

Per AB 52, you have the right to consult on a proposed public or private project prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. You have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this project. Please provide your contact information and mail your request to:

Los Angeles Department of City Planning  
Attn: Chi Dang  
200 N. Spring Street, Room 621  
Los Angeles, CA 90012  
Email: [chi.dang@lacity.org](mailto:chi.dang@lacity.org)  
Phone No.: (213) 978-1307

Sincerely,

Chi Dang  
Planning Assistant

**Appendix D.  
Confidential Native American Coordination Documents**

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## GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians / Gabrielino Tribal Council  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

City of Los Angeles  
200 N Spring Street, Room 621  
Los Angeles, CA 90012

December 10, 2018

Re: AB52 Consultation request for project located at 350 South Figueroa Street

Dear Chi Dang,

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. For this reason, the NAHC will always refer the lead agency to the respective Native American Tribe of the area. The NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and can provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area.

Additionally, CEQA now defines Tribal Cultural Resources (TCRs) as their own independent element separate from archaeological resources. Environmental documents shall now address a separate Tribal Cultural Resource section which includes a thorough analysis of the impacts to only Tribal Cultural Resources (TCRs) and includes independent mitigation measures created with Tribal input during AB-52 consultations. As a result, all mitigation measures, conditions of approval and agreements regarding TCRs (i.e. prehistoric resources) shall be handled solely with the Tribal Government and not through an Environmental/Archaeological firm.

In effort to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email [admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org) to schedule an appointment.

*\*\* Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: <http://calepa.ca.gov/Tribal/Training/> or <http://nahc.ca.gov/2015/12/ab-52-tribal-training/>*

With Respect,

Andrew Salas, Chairman

Andrew Salas, Chairman

Albert Perez, treasurer |

PO Box 393, Covina, CA 91723

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer ||

[www.gabrielenoindians.org](http://www.gabrielenoindians.org)

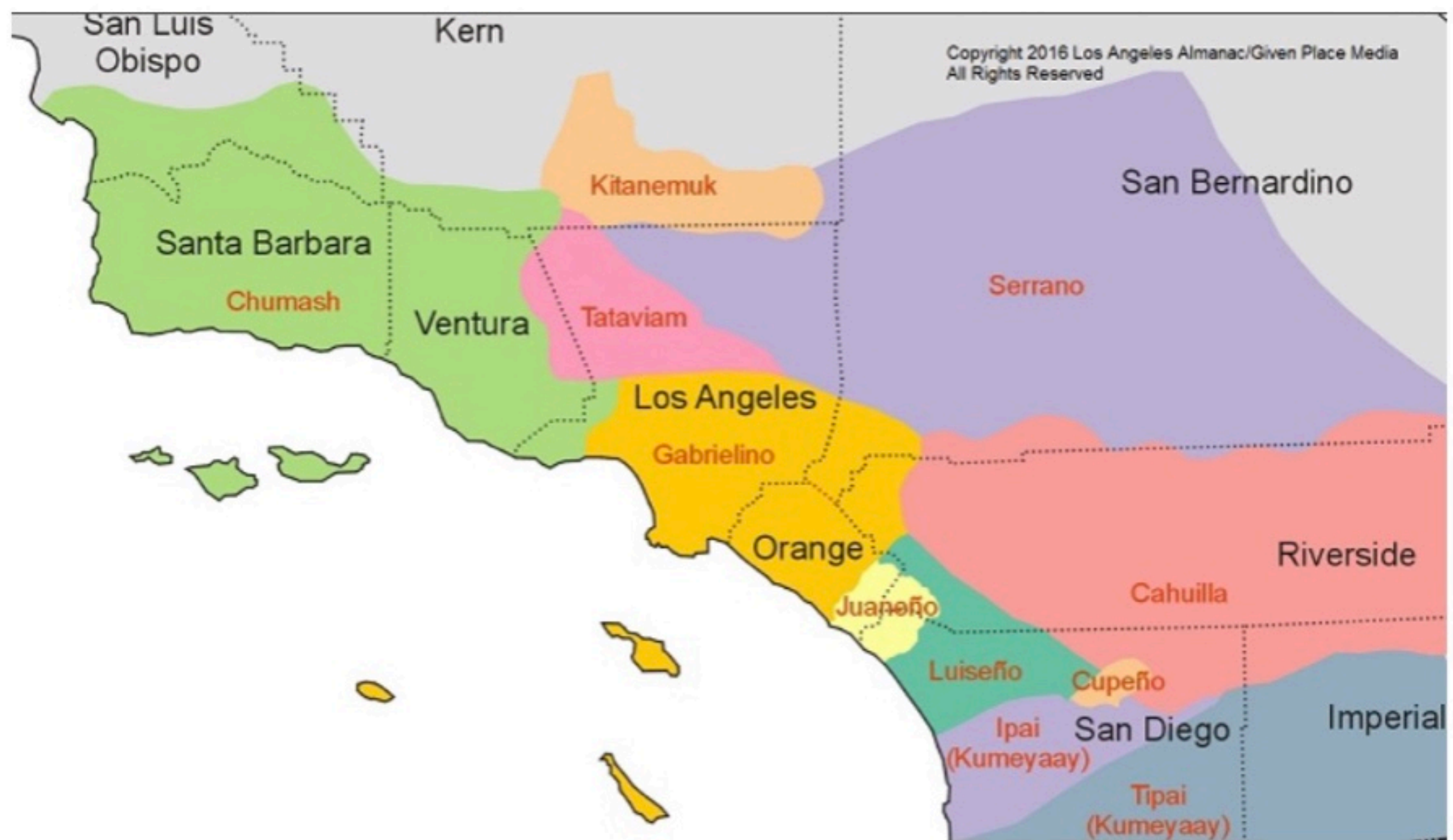
Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the Council of Elders

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)



# Original People of Los Angeles County



Map of territories of Original Peoples with county boundaries in Southern California.