TRIBAL CULTURAL RESOURCES ASSESSMENT FOR THE 17346 SUNSET BOULEVARD PROJECT, 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 17346 Sunset Boulevard project (project) located in the Pacific Palisades neighborhood of Los Angeles, California. The project proposes to demolish a vacant single-story fast food restaurant structure and associated parking, and construct a 5-story, 60-foot-9-inch mixed-use development consisting of 40 residential dwelling units and approximately 3,000 square feet of ground-floor commercial uses. The proposed project includes construction of an integrated retaining wall and will require between 3 and 12 m (10 and 40 feet) of excavation. The City of Los Angeles (the City) Department of City Planning (the City) is the lead agency. 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. This report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search, and archival research used to evaluate the presence or likelihood of tribal cultural resources within the project site and to identify whether significant impacts to those resources will occur as a result of implementing the proposed project.

Dates of Investigation: The results of the SLF search from the Native American Heritage Commission (NAHC) were received on August 27, 2018. AB 52 notification letters were sent by the City to eight tribal groups on February 21, 2018. On September 6, 2018, SWCA conducted a confidential search of the CHRIS at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton.

Summary of Findings: A confidential CHRIS records search did not identify any tribal cultural resources within the project site, but three prehistoric (i.e., Native American) archaeological sites were identified within a 0.5-mile (0.8-km) radius. P-19-000134 and P-19-000214 are hypothesized to be parts of a single large village site, located approximately 150 m (492 feet) south of the project site. The sites were described as having contained points, scrapers, metates, manos, and pestles but a detailed inventory and description was not taken at the time. An aerial photo from 1927 shows the plotted location of the sites in what appear to be a mixture of dunal sand deposits, alluvium deposited from Santa Ynez Creek, and colluvial sediments eroding from the adjacent terrace to the north. The sites were reported to have been destroyed during construction in 1953.

The City submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. The Gabrielino Band of Mission Indians–Kizh Nation responded and requested formal consultation. The City acknowledged the request and initiated consultation after March 5, 2018. The City and Tribe corresponded through phone conference and email, during which time the Tribe submitted additional documents to support their concern about the Project area being sensitive. The consultation was completed on January 4, 2019 with a letter sent by the City, summarizing the findings. First, after acting in good faith and after reasonable effort, mutual agreement could not be reached between the City and the Tribe for purposes of AB 52. Second, the City found substantial evidence existed to support a conclusion that the Project may cause a significant impact on tribal cultural resources, for which mitigation measures and a Condition of Approval for inadvertent discovery were created and attached to the letter. Third, the City found that the mitigation measures would mitigate potential significant impacts.

The SLF search returned by the NAHC was negative for sacred lands and sites. The nearest Gabrielino place names referenced in ethnographic and historical literature is Topaa'nga. Though the precise location of this community is not known, the available information suggests the village is located between 2.4–3.2 km (1.5 and 2 miles) away. The closest permanent historical water source to the project site is Topanga Creek, currently located approximately 2.4 km (1.5 miles) to the west. There are no known springs within

the project site, but Santa Ynez Creek does flow down Santa Ynez Canyon, and historically was a seasonal stream that ran to the ocean.

Prehistoric-period archaeological materials were documented in 1912 and 1950 as two sites located approximately 150 m (492 feet) south of the project site. Previously conducted studies identified in the CHRIS records search describe archaeological sites found east and west of the project site that are similar in age, contents, and setting, i.e., the southern, ocean-facing side of an alluvial terrace. Where previous studies assessed the archaeological sensitivity of the Santa Ynez Canyon (specifically) or these coastal settings (in general), there is a consensus that the canyon outlets were intensively utilized by Native Americans and are highly sensitive for cultural resources being present, at least prior to historical developments. Natural resources used by Native Americans would have been abundant within Santa Ynez Canyon and along the Pacific Ocean, in general. Both of these suggest favorable conditions for Native American habitability within the project site. The eastern portion of the project site contains some colluvial deposits that appear capable of preserving physical remains from any Native American sites, features, or objects that may have once existed as a surface deposit or been shallowly buried. These increases are offset by the historical disturbances to the overall physical setting and generally lower probability that a prehistoric camp would have been located directly on a steep slope. Therefore, considering the information available on Native American settlement patterns for the vicinity of the project site, historic disturbances, and soil data for the project site, SWCA finds the project site has a low to moderate sensitivity for containing unidentified tribal cultural resources.

Conclusion: The likelihood for encountering unidentified tribal cultural resources exists only within the colluvial sediments situated between the artificial fill and bedrock. The potential for unidentified tribal cultural resources within the project site is found to be moderate. Specifically, there is a likelihood that material remains from a Native American camp are present in the project site, which would have cultural value to a California Native American tribe. If present, the site could be used to answer important research questions, would be considered eligible for listing in the CRHR under Criteria 4, and therefore meet the definition of a tribal cultural resource under CEQA. The project is subject to the City's standard condition of approval for Tribal Cultural Resources Inadvertent Discovery, which provides a protocol in the event of a discovery. However, considering that such a resource would qualify for the CRHR, that the project site has not been previously inspected for the presence of the resource below the surface, the moderate sensitivity for the presence of the resource, and the subtle nature of the features and objects potentially present, SWCA recommends, as mitigation measures, 1) retaining a qualified archaeologist and 2) conducting a worker environmental awareness program training to ensure that any such resources are properly identified and preserved. Implementation of these measures would reduce potentially significant impacts to tribal cultural resources to a less-than-significant level.

Disposition of Data: The final report and any subsequent related reports will be submitted to Gonzales Law Group; the Project applicant; the Los Angeles Department of City Planning; and the SCCIC at California State University, Fullerton. Research materials and the report are also on file at SWCA's Pasadena office.

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INTRODUCTION

SWCA Environmental Consultants (SWCA) conducted a tribal cultural resources assessment for the proposed 17346 Sunset Boulevard project (project) located in the Pacific Palisades neighborhood of the city of Los Angeles, California. The project proposes to demolish a vacant single-story fast food restaurant structure and associated surface parking, and construct a 5-story, 60-foot-9-inch mixed-use development consisting of 40 residential dwelling units and approximately 3,000 square feet of ground-floor commercial uses. The proposed project includes construction of an integrated retaining wall and will require between 3 and 12 m (10 and 40 feet) of excavation.

The City of Los Angeles (the City) Department of City Planning is the lead agency. 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. This report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search, and archival research used to evaluate the presence or likelihood of tribal cultural resources within the project site and to identify whether significant impacts to those resources will occur as a result of implementing the proposed project.

SWCA Cultural Resources Project Manager Chris Millington, M.A., Registered Professional Archaeologist (RPA), conducted background research, co-authored the report, and acted as Principal Investigator to provide quality assurance/quality control. SWCA Field Director Trevor Gittelhough, M.A., RPA, conducted background research and co-authored the report. Copies of this report will be on file with SWCA's Pasadena office, the project applicant, the City, and the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. Non-confidential report figures are included in Appendix A. Appendices B and C contain confidential report figures and CHRIS records search results. Appendix D contains the SLF results letter from the Native American Heritage Commission (NAHC). Appendix E contains copies of non-confidential AB 52 notification letters. Appendix F contains confidential AB 52 correspondence documents.

PROJECT DESCRIPTION

The project proposes to demolish a vacant single-story fast food restaurant structure and associated surface parking, and construct a 5-story mixed-use residential and commercial development. The project site is located at 17346 Sunset Boulevard in the Pacific Palisades neighborhood of Los Angeles (Figure A-1). This project site is in an unsectioned portion of Township 1 South, Range 16 West (San Bernardino Base Meridian), as shown on the United States Geological Survey (USGS) Topanga Canyon, California, 7.5-minute quadrangle (Figure A-2). The project site is a 14,963-square-foot parcel (Los Angeles County Assessor's Parcel Number [APN] 4415-018-018) that is currently occupied by a vacant fast food structure and surrounding paved surface parking lot (Figure A-3). The surrounding area is largely urbanized and includes commercial and residential properties. Adjacent properties include a small market place containing small businesses to the northeast, Sunset Boulevard to the northwest and west, a steep slope topped by the Edgewater Towers Condominiums to the southeast, and a driveway bounded by a small business to the southwest.

The project proposes to demolish the extant building and associated parking lot and construct one 5-story, mixed-use commercial and residential building with integrated parking. The proposed buildings and parking will be constructed 3 m (10 feet) below grade, with two subterranean floors and a basement. Excavation up to approximately 12 m (40 feet) below grade is estimated to be required because of ascending site grades toward the southeast.

REGULATORY SETTING

State Regulations

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

California Environmental Quality Act

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

TRIBAL CULTURAL RESOURCES

Assembly Bill 52 of 2014 (AB 52) amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as one of the following:

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

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures 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 regardless of whether 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 to notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project site as well as those Native American tribes that 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 CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR. According to PRC Section 5024.1(c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- **Criterion 2:** It is associated with the lives of persons important in our past.

- **Criterion 3:** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- **Criterion 4:** It has yielded, or may be likely to yield, information important in history or prehistory.

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

Conditions of Approval

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

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290. 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.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

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

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or
  (323) 343-0714 (after hours, Saturday, Sunday, and holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the 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 Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

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 September 6, 2018, SWCA conducted a confidential search of the CHRIS at the SCCIC, located on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.5-mile (0.8-km) radius of the project site. The SCCIC maintains records of previously documented cultural resources (including those that meet the definition of a tribal cultural resource) and technical studies, and maintains copies of the OHP's portion of the Historical Resources Inventory. A map showing the location of previously recorded resources and copies of all reports and resource forms are included here as confidential attachments (Appendix B and Appendix C).

Sacred Lands File

SWCA also conducted a search of the SLF to determine if known sacred sites that could be considered tribal cultural resources are present within the vicinity of the project site or could potentially occur within the project site. A request to conduct a search of the SLF was sent to the NAHC on August 27, 2018. A copy of the results letter is included here as Appendix D.

Archival Research

SWCA reviewed property-specific historical and ethnographic 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 geo-referenced 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 (SurveyLA); Huntington Library Digital Archives; Santa Monica Public Library; Library of Congress; Los Angeles Public Library 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. SWCA also reviewed technical reports prepared for the project including the geotechnical study by Applied Earth Sciences (Minas and Minas 2017).

Sensitivity Assessment

In circumstances where a known tribal cultural resource is not present, SWCA assessed the potential for the presence of an unidentified resource below the surface (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 could contain buried sites, features, or objects (i.e., preservation potential). Lacking any data specifically gathered to assess the presence or absence of such 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 by Native Americans in the Prehistoric period are proximity to natural features (e.g., perennial water source, plant or mineral resources, animal habitat), other known sites, flat topography, and relatively dry conditions. Ethnographic or historical accounts are also considered where they provide additional information about former communities, village sites, placenames, or areas otherwise frequented or occupied by Native Americans during the Historic period. 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 situated along the eastern edge of an alluvial terrace formed along the southwestern margin of the Santa Monica Mountains. The terrace is cut by Santa Ynez Canyon, one of several southwest-trending canyons originating upslope within the interior of the Santa Monica Mountains, including the adjacent Temescal and Topanga canyons to the east and west, respectively. The project site is set along the eastern bank of lower Santa Ynez Canyon, and includes a steep portion of the descending backslope and the relatively flat toeslope. There is approximately 12 m (40 feet) of relief between the bottom of the canyon and the crest of the southwest-trending slope to the southeast that has been cut and

modified. This location is approximately 190 m (623 feet) north of the Pacific Ocean at an elevation of 29 m (95 feet) above mean sea level.

Surficial sediments within the project site were defined by Dibblee and Ehrenspeck (1992), who described three stratigraphic units within the vicinity of the project: artificial fill (Af); Quaternary age colluvial soils (Qc); and Topanga formation sedimentary bedrock from the middle Miocene (Ttls)[1]. Figure A-4 depicts the underlying geologic units within the project site based on work by the California Geologic Survey (2009), who slightly revised Dibblee and Ehrenspeck's description of the Topanga formation bedrock unit (labeled in the figure as Tss). Both geologic maps depict older, middle Miocene (23.0 to 5.3 million years before present) sedimentary bedrock on the northwest-facing backslope of a stream terrace, which is capped by middle to late Pleistocene (781,000 to 11,700 years before present) alluvial sediment deposits. Though, most of the project site—approximately two-thirds in the northwest portion—is defined by the artificial fill.

A geotechnical study was carried out within the project site in May 2016 by Applied Earth Sciences (Minas and Minas 2017). The work included excavation of three hand-dug test pits and three hollow-stem auger borings, which provide much finer detail of the depositional environment (Figure A-5 through Figure A-7). The study also incorporates the results of two previous test pits excavated within the project site, as well as geotechnical studies conducted in adjacent parcels. Minas and Minas (2017) define two principal soils—artificial fill (Af) and colluvium (Qc)—overlying Miocene bedrock formations (Ttls). The artificial fill was identified on the surface of the entire project site, ranging between 0.6 and 1.5 m (2 and 5 feet) deep, which is relatively thin on the steep backslope and thicker at lower elevations (see Figure A-6 and Figure A-7). The fill consists of dark brown silty sandy clay, clayey silty sand to sandy clayey silt with scattered angular gravel (Minas and Minas 2017:8).

The colluvium is situated between the artificial fill and much older bedrock and measured 1 to 3 feet in thickness. The colluvial soils were observed as a silty clayey sand with angular to rounded gravel inclusions. Descriptions of the colluvium identified on the backslope test trenches seem to indicate a higher percentage of larger sized gravels, which is typical of higher energy deposition along a backslope. The colluvium comprises materials deposited from the Santa Monica Mountains on top of a wave-cut bench, represented by the marine sediments formed at much higher sea levels than today. McGill states that in the Pacific Palisades area the original stream terrace surfaces may have been graded down to the Pleistocene-era levels due to global changes in sea level (McGill 1989). As sea levels dropped following the late Pleistocene interglacial period, the marine bench was essentially buried by these colluvial sediments. Thus, the colluvium is associated broadly with the Quaternary period and may range in age between 2.6 million and 11.7 thousand years before present.

The climate in the project site is described as Mediterranean and characterized by mild, rainy winters and warm, dry summers. The Pacific Ocean coastal habitat provides conditions that promote high floral and faunal diversity. The Santa Monica Mountains support 12 endemic vegetation communities, including coastal salt marsh, coastal strand, coastal sage scrub, chaparral, coast live oak woodland, riparian woodland, valley grassland, and valley oak savanna. Several invasive plant species are also present within the Santa Monica Mountains, including different types of grasses (e.g., Pampas grass and cheat grass), bushes (e.g., swamp saltbush and Spanish broom), and weeds (e.g., yellow star thistle, fennel, and Russian thistle). A diverse range of fauna are also abundant: more than 450 vertebrate species occur in the Santa Monica Mountain area, and include animals such as mountain lions, bobcats, gray fox, coyotes, squirrels, mice, shrews, and wood rats. Other animals include various reptiles (e.g., turtles, California

[1] Colluvial soils (i.e., colluvium) are defined as those deposited primarily through gravitational forces. Alluvial soils (i.e., alluvium) are those deposited primarily by water.

king snake, and the southern Pacific rattlesnake), and birds (e.g., red-tailed hawk, Cooper's hawk, golden eagle, great-horned owl, and white-tailed kite). Native (e.g., arroyo chub, steelhead trout, and Pacific lamprey) and non-native (e.g., largemouth bass and goldfish) fish can also be found in the streams and coastal lagoons of the Santa Monica Mountain area.

CULTURAL SETTING

Prehistory

Prehistoric Overview

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

HORIZON I: EARLY MAN (CA. 10,000–6000 BC)

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

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

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

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

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

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

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

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

By AD 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that 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 AD 500 and European contact, which occurred as early as 1542, is divided into three regional patterns: Chumash (Santa Barbara and Ventura counties), Takic/Numic (Los Angeles, Orange, and western Riverside counties), and Yuman (San Diego County). The seemingly abrupt introduction of cremation, pottery, and small triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino/Tongva, Juaneño, and Luiseño people in this region are considered the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast in this period.

Ethnographic Overview

The project 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 Tatataviam/Alliklik to the north,

the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name "Gabrielino" (sometimes spelled Gabrieleno or Gabrieleño) denotes those people who were administered by the Spanish from Mission San Gabriel. In the post-European contact period, Mission San Gabriel included people indigenous to 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. For example, 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).

Other names 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). Some present-day descendants of these people have also taken on Tongva as a preferred group name because it has a native rather than Spanish origin (King 1994:12). For purposes of the following report, the term "Gabrielino" will be used to reference indigenous people living in the greater Los Angeles area at the time of Spanish contact.

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).

European contact with the Gabrielino occurred as early as 1542 with the Spanish expedition led by Juan Rodriguez Cabrillo, followed by Sebastián Vizcaíno in 1602, both of who visited Santa Catalina Island. Colonization of Gabrielino lands did not begin in earnest until after the inland expedition led by Gaspar de Portolá in 1769; by 1771, four missions had been constructed in the region, including Mission San Gabriel, located in Los Angeles County and founded in September 1771 (Engelhardt 1927). The Franciscan missions, charged with converting the Native Americans to Christianity and with acculturating them to European society and economy, began relocating them to mission grounds.

Known as *reducción*, relocation and baptism initially involved the Eastern Gabrielino of the plains as far south as the Santa Ana River and west to the Los Angeles River. The missionaries later proselytized the Western Gabrielino living west of the Los Angeles River, on the southern Channel Islands, and the interior groups to the east and south. Between 1780 and 1794, most people from the southeast region were baptized and removed to the mission (NEA and King 2004). Mission San Fernando del Rey was founded in 1797, and its priests pushed into the lands of other tribes located to the north and west and also converted Gabrielino people along the Los Angeles River and its tributaries. Although mission life did give indigenous people some skills needed to survive in a rapidly changing world, much traditional cultural knowledge was lost during this era as populations were moved and decimated by introduced diseases for which the people had no immunity.

With the founding of the Pueblo of Los Angeles in December 1781, civilian settlers came into the region, soon followed by retiring military men and their families from the Spanish garrisons (Engelhardt 1927:48–51). The soldiers were given vast tracts of land by Spanish authorities within traditional Gabrielino subsistence areas. The Native Americans (both neophytes from the disintegrating missions and cimarrones, or gentile Indians) were among those who worked on the large ranchos. After governmental control of California shifted to Mexico, the missions were formally secularized in 1834, and the extensive mission lands were divided into private land grants, claimed by the growing ranchero class. With the migration of farmers to southern California after the Mexican-American War of 1846, the local Native population, who continued to work as laborers, was soon a minority often lumped together with the Mexican-American community. Many allied themselves with remaining Native American communities in the Tehachapi and San Bernardino mountains.

Native American Communities Near the Project Site

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.

Other clues about the approximate locations of the communities have also been taken where associations were described between the village areas with specific ranchos or land grants, as well as prominent natural features within those approximate boundaries. McCawley (1996:32) cites Kroeber's (1925:616) description as seminal in his summary of the circumstance:

> The Indians of this region, Serrano, Gabrielino, and Luiseño, have long had relations to the old ranchos or land grants, by which chiefly the country was known and designated until the Americans began to dot it with towns. The Indians kept in use…native names for these grants. Some were the designations of the principal village on the grant, others of the particular spot on which the ranch headquarters were erected, still others of camp sites, or hills, or various natural features.

The closest named Native American village to the project site is known as Topaa'nga (McCawley 1996:23; NEA and King 2004:21), and is estimated to have been located approximately 1.5 miles west of the project site (Figure A-8). The village of Topaa'nga was the westernmost Gabrielino village, though there were strong influences reported from the neighboring Chumash. The village name, Topaa'nga, is translated in the Ventureño language as "the point of that mountain range which ends there in the sea" (McCawley 1996:61), and is the origin of the modern place name Topanga (Gudde 2004:397).

Although the precise location of any given village is subject to much speculation, it is clear the banks of the major stream courses such as Topanga Creek were home to many Gabrielino villages throughout the greater Los Angeles area (McCawley 1996:4). Similarly, foraging and seasonal camps surrounding springs would have almost certainly been a regular occurrence and correlate more regularly with archaeological assemblages (Dillon 1994:24–25). Although the primary source for specific settlements or travel routes is not always provided, maps produced by multiple researchers throughout the twentieth century depict the generalized settlement pattern for the Gabrielino around the time of Spanish and Mexican occupation. This can be seen in George Kirkman's (1938) map of historical sites ca. 1860–1937 (Figure A-9). These maps convey a general sense of significant historical areas based on the geographic information available at the time and are considered as a representational depiction of these locations rather than explicit geographic points.

History

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

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan 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 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 established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

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

Mexican Period (1822–1848)

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

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

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

American Period (1848–Present)

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

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, 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 south to north within 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 2 years after the Mexican–American War and 5 months prior to California achieving statehood, Los Angeles was officially incorporated as an American city. Settlement of the Los Angeles region continued steadily throughout the Early American period. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California acquiring official statehood in the United States.

Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944). The project site is within the boundaries of the historic Rancho Boca de Santa Monica, positioned between Rancho San Vicente y Santa Monica to the north and Rancho La Ballona to the southeast. Governor Juan Alvarado gave the 6,656-acre rancho to Ysidro Reyes and Francisco Marquez in 1839, but the land was not patented until 1882 (Willey 1886). Upon the death of Ysidro Reyes 1861, the rancho was passed to his widow Maria Antonia. She sold her interest to Robert S. Bake in 1872, who, along with the Marquez family, partitioned it in 1874. Around the turn of the twentieth century the land surrounding the project site still retained a pastoral character with very few permanent residents. Parts of the original land grant have evolved into the communities of Brentwood and Pacific Palisades. In the 1920s, the families sold what remained of their lands to the Santa Monica Land & Water Company.

Ranching retained its importance through the mid-nineteenth century, and by the late 1860s, Los Angeles was one of the top dairy production centers in the country (Rolle 2003). By 1876, the county had a population of 30,000 (Dumke 1944:7). Los Angeles maintained its role as a regional business center, and the development of citriculture in the late 1800s and early 1900s further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the impact of the real estate boom of the 1880s on Los Angeles (Caughey and Caughey 1977; Dumke 1944). By the late 1800s, government leaders recognized the need for water to sustain the growing population in the Los Angeles area. Irish immigrant William Mulholland

personified the city's efforts for a stable water supply (Dumke 1944; Nadeau 1997). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile aqueduct that brought the valley's water to the city (Nadeau 1997).

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

Los Angeles: From Pueblo to City

On September 4, 1781, 44 settlers from Sonora, Mexico, accompanied by the governor, soldiers, mission priests, and several Native Americans, arrived at a site 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 (Ríos-Bustamante 1992; Robinson 1979:238; Weber 1980). The site chosen for the new pueblo was elevated on a broad terrace 0.5 mile (0.8 km) west of the river (Gumprecht 2001). By 1786, the area's abundant resources allowed the pueblo to attain self-sufficiency, and funding by the Spanish government ceased.

Efforts to develop ecclesiastical property in the pueblo began as early as 1784, with the construction of a small chapel northwest of the plaza. Though little is known about this building, it was located at the pueblo's original central square near the corner of present-day Cesar Chavez Avenue and North Broadway (Newcomb 1980:67–68; Owen 1960:7). Following continued flooding, however, the pueblo was relocated to its current location on higher ground, and the new town plaza soon emerged.

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

Newcomers poured into the city, nearly doubling the population between 1870 and 1880, resulting in an increased demand for public transportation options. As the city neared the end of the nineteenth century, numerous privately owned passenger rail lines were in place. Though early lines were horse- and mule-drawn, they were soon replaced by cable cars in the early 1880s, and by electric cars in the late 1880s and early 1890s. Many of these early lines were subsequently consolidated into Henry E. Huntington's Los Angeles Railway Company (LARy) in 1898, which reconstructed and expanded the system into the twentieth century and became the main streetcar system for central Los Angeles, identified by their iconic "yellow cars" (Electric Railway Historical Association of Southern California [ERHA] 2018). During this period, Huntington also developed the much larger Pacific Electric system (also known as the "red cars") to serve the greater Los Angeles area. Just as the horse-and-buggy street cars were replaced by electric cars along the same routes, gas-powered buses (coaches) eventually served former yellow car routes. Both the Red Cars and LARy served Los Angeles until they were eventually discontinued in the early 1960s (ERHA 2018).

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

PACIFIC PALISADES AND INCEVILLE

The area that would become the Pacific Palisades is located within the boundaries of Rancho Boca de Santa Monica and was granted by the governor of California during the Mexican period to Francisco Marquez and Ysidro Reyes in 1839 (Historic Resources Group 2013:7). The area was largely uninhabited until well into the twentieth century, though the area was popular with Angelenos seeking to escape the summer heat. In 1911, filmmaker Thomas Ince came to Los Angeles to look for a suitable location for his studios, settling on 18,000 acres of oceanfront property in Santa Ynez Canyon. Also known as the Miller 101 Bison Ranch Studio, Inceville began with Thomas Ince purchasing a 460-acre ranch located at the intersection of Sunset Boulevard and the Pacific Coast Highway (McVeigh 2007). Before long, Ince was able to purchase almost 18,000 acres of land up the Santa Ynez Canyon in 1912 and build the first major movie studio in Los Angeles. Consisting of numerous sets, including a Japanese village, a Puritan settlement, and a lighthouse, which allowed various types of movies to be shot, Thomas Ince is most known for his westerns. To film these westerns he leased out the entire 101 Ranch and Wild West show, which included almost 200 Sioux tribal members. When more indigenous actors were needed, Thomas Ince was able to make an agreement with the federal government for entire family groups of the Oglala Sioux from the Pine Ridge Reservation (Aleiss 2005). In just over half a decade, these Sioux appeared in more than 80 different westerns. A series of misfortunes forced Ince to the sell the land in 1922 to Charles H. Scott, a Methodist reverend, officially marking the beginning of the Pacific Palisades (Historic Resources Group 2013:9; Loomis 2009). Scott envisioned a religious enclave for the Chauteauqua operation, which was a heavily religious educational reform movement at the time (Loomis 2009). During WWII the Pacific Palisades served as a sanctuary for German writers, artists, and intellectuals fleeing the war, including Thomas Mann, Bertolt Brecht, and Fritz Lang (Historic Resources Group 2013:12; Jones 2007). The area was annexed by the City of Los Angeles in 1916 as part of the Westgate annexation.

RESULTS

CHRIS Records Search

Previously Conducted Studies

The results of SWCA's records search at the SCCIC indicate that 27 cultural resource studies have previously been conducted within 0.5 mile (0.8 km) of the project site; none includes the project site directly (Table 1, Figure A-10). Several of the studies were conducted along Pacific Coast Highway (PCH), directly south of the project site (e.g., LA-01538, LA-01794, LA-03801, LA-07841, LA-10578); within the right-of-way of Sunset Boulevard (e.g., LA-11606); or within Santa Ynez Canyon, directly north of the project site (e.g., LA-01064, LA-04018, LA-04532). Many of these studies were conducted as archaeological assessments, which did not include field surveys and subsurface testing, while others that included fieldwork were conducted after the respective study areas were already disturbed by developments, so that any tribal cultural resources that may have been identified on the surface were already destroyed. Among the previous studies that assess the archaeological sensitivity of the Santa Ynez

Canyon (specifically) or coastal areas (in general), there is a consensus that the canyon outlets were intensively utilized by Native Americans and are highly sensitive for cultural resources being present. Because of their relevance to the current analysis, three of the studies are described below in greater detail. One of the studies (LA-00478) was conducted in an adjoining parcel to the north of the project site in an essentially identical physical setting. Another study by Dillon (LA-01538) included a pedestrian survey along a 20-mile segment of PCH and describes the condition of 18 archaeological sites. A subsequent study by Wlodarski (LA-01794) initiated a pedestrian survey heading east along PCH beginning at Sunset Boulevard, where Dillon's study terminated.

Table 1. Previously Conducted Cultural Resources Studies within 0.5 mile of the Project Site

Report No.	Study Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-00478	Assessment of the Archaeological Resources Located at 17340 Sunset Blvd., Pacific Palisades, Los Angeles County, California	Rosen, Martin D. (University of California, Los Angeles Archaeological Survey)	1979	Archaeological, field study	Parcel adjoining project site
LA-00449	Archaeological Survey Report on Tentative Tract # 35190 Located in the Pacific Palisades Area of the County of Los Angeles	Desautels, Roger J. (Scientific Resource Surveys, Inc.)	1978	Archaeological, field study	Outside
LA-00450	Archaeological Survey Report on Tentative Tract #35190, Located in the Pacific Palisades Area of the County of Los Angeles	Desautels, Roger J. (Scientific Resource Surveys, Inc.)	1978	Archaeological, field study	Outside
LA-00557	Archaeological Records Search and Field Reconnaissance of 17490 Revillo Drive, Tract No, 8923, Lot 1, Block 16, in the Castelmar Section of Pacific Palisades, California EIR Case No. 422-79-bp©	Rosen, Martin D. (University of California, Los Angeles Archaeological Survey)	1979	Archaeological, field study	Outside
LA-00576	An Archaeological Resource Survey and Impact Assessment of Tentative Tract No. 38139 Los Angeles County	Hector, Susan M. (University of California, Los Angeles Archaeological Survey)	1979	Archaeological, field study	Outside
LA-00621	Cultural Resource Reconnaissance Lots 2 and 3 Tract Number 10238 Pacific Palisades, Los Angeles County	Greenwood, Roberta S. and Michael J. McIntyre (Greenwood and Associates)	1979	Archaeological, field study	Outside
LA-00646	An Archaeological Records Search and Preliminary Field Reconnaissance of 17501 and 17509 Posetano Road, Castelamar Section of Pacific Palisades, City of Los Angeles, California	Rosen, Martin D. (University of California, Los Angeles Archaeological Survey)	1979	Archaeological, field study	Outside
LA-00674	Assessment of the Archaeological Resource Located on Part of Block D, Tramonto Drive, Pacific Palisades, Los Angeles County	Love, Bruce (University of California, Los Angeles Archaeological Survey)	1980	Archaeological, field study	Outside
LA-01064	Archaeological Assessment in Santa Ynez Canyon, Los Angeles County, California	Padon, Beth	1981	Archaeological, field study	Outside
LA-01077	Cultural Resource Evaluation: Palisades Preparatory School 100 Marquez Place, Pacific Palisades	Schrider, James E. (Greenwood and Associates)	1981	Archaeological, field study	Outside

Report No.	Study Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-01118	Draft Environmental Impact Report Los Liones Townhouses Pacific Palisades, California	Ultrasystems (Ultra Systems, Inc.)	1974	Archaeological, field study	Outside
LA-01193	Cultural Resource Survey and Impact Assessment for 3.12 Acres Located Adjacent to 17339 Tramonto Drive, Pacific Palisades	Singer, Clay A.	1982	Archaeological, field study	Outside
LA-01452	Archaeological Surface Reconnaissance of Land Located at the Northwest Corner of Sunset Boulevard and Palisades Drive	Romani, John F. (Northridge Archaeological Research Center, CSUN)	1978	Archaeological, field study	Outside
LA-01538	Malibu Wastewater Facilities Plan: Archaeological Analysis Survey Report	Dillon, Brian D.	1986	Archaeological, field study	Outside
LA-01794	Archaeological Reconnaissance Report for the Proposed Sunset Pumping Plant and Force Main Project, Pacific Coast Highway, Los Angeles County, California.	Wlodarski, Robert J. (Historical, Environmental, Archaeological, Research, Team)	1989	Archaeological, field study	Outside
LA-02309	Addendum Archaeological Reconnaissance Report for the Sunset Pumping Plant and Pressurized Gravity Sewer/common Force Main Project, Pacific Coast Highway, Los Angeles County, California	Wlodarski, Robert J. (Historical, Environmental, Archaeological, Research, Team)	1991	Archaeological, field study	Outside
LA-03640	The Santa Monica Mountains State Parks	Uthe, Robert F., H. Lee Warren, and James M. Tryner (Department of Parks and Recreation)	1976	Management/ planning, other research	Outside
LA-03801	Prehistoric and Historic Cultural Resource Assessment for the Unsurveyed Portion of the Proposed Pacific Coast Highway Bike Pathway Extension, Will Rogers Beach State Park, Pacific Palisades, Los Angeles County, California	Jertberg, Patricia R. (Petra Resources Inc.)	1997	Archaeological, field study	Outside
LA-04016	Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 857-01, 17020 1/2 Sunset Boulevard, City and County of Los Angeles, California	McLean, Deborah K. (LSA Associates, Inc.)	1998	Archaeological, field study	Outside
LA-04018	Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 858-01, 17815 1/2 Sunset Boulevard, City and County of Los Angeles, California	McLean, Deborah K. (LSA Associates, Inc.)	1998	Literature search	Outside
LA-04187	Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 943-01, 17300 1/2 Pacific Coast Highway, City and County of Los Angeles, California	McLean, Deborah K. (LSA Associates, Inc.)	1998	Archaeological, field study	Outside
LA-04532	Cultural Resources Study, Analysis of Off Site Alternatives (Humboldt Street and Lake Shrine Properties) for the Self Realization Fellowship Revised Master Plan Environmental Impact Report, Arroyo Seco and Topanga Areas, Los Angeles, Los Angeles County, California	Bissell, Ronald M. (RMW Paleo Associates, Inc.)	1999	Literature search	Outside

Report No.	Study Title	Author (Affiliation)	Year	Study Type	Proximity to Project Site
LA-07841	Project Proposes to Construct Curb Ramps at Various Locations on Pacific Coast Highway from Pier Avenue to Topanga Canyon Boulevard and on Route 27 Mulholland Drive	Sylvia, Barbara (Caltrans District 7)	2001	Archaeological, field study	Outside
LA-10102	Cultural Resources Study of the Bel-air Bay Club Project AT&T Wireless Site No. C065 16800 Pacific Coast Highway, Pacific Palisades Los Angeles County, California 90272	Unknown (Historic Resource Associates)	2006	Archaeological, field study	Outside
LA-10578	TEA21 Rural Roadside Inventory: Native American Consultation and Ethnographic Study Caltrans District 7, County of Los Angeles	Fortier, Jana (ICF Jones & Stokes)	2009	Management/ planning	Outside
LA-11138	California Outer Continental Shelf, Archaeological Resource Study: Morro Bay to Mexican Border, Final Report.	Pierson, Larry, Shiner, Gerald, and Slater, Richard (PS Associates)	1987	Archaeological, field study	Outside
LA-11606	Phase I Cultural Resources Assessment, Sylmar Ground Return Replacement Project, Los Angeles County, California	Maxon, Patrick (BonTerra Consulting)	2011	Archaeological, field study	Outside

LA-00478

This study was conducted in 1979 by UCLA Archaeologist Martin Rosen as an archaeological assessment for the property located at 17340 Sunset Boulevard (Rosen 1979), located in the parcel adjoining the project site to the north. The study included a records search and pedestrian survey of the parcel, which at the time was undeveloped. The study noted that two prehistoric sites, P-19-000134 and P-19-000219, had been identified less than a mile away, and that the previous records speculated the sites may have been destroyed during construction of a gas station at the corner of Sunset Boulevard and Pacific Coast Highway. No cultural resources were identified by the survey. The report concluded that it was highly unlikely any archaeologist resources were present in the parcel because of disturbances to the setting that they believe destroyed any extant resources (Rosen 1979:2–3).

LA-01538

This study was conducted in 1986 by UCLA Archaeologist Dr. Brian Dillon along an approximately 20-mile segment of PCH between Broad Beach Road and Sunset Boulevard to assist in planning for a wastewater pipeline. Dillon's (1986) study included pedestrian survey along both sides of PCH that resulted in identification of 18 archaeological sites. Some of the sites were identified on the surface on both sides of PCH and outside of the area disturbed by the road construction (e.g., CA-LAN-19, CA-LAN-201, CA-LAN-264), and at least one was identified with deposits visible in a cut below the road grade and artificial fill (site CA-LAN-210), while several others were situated upslope and offset from the road. The study terminated at Sunset Boulevard and the closest site identified by the study is located in Topanga Canyon, approximately 1.75 miles west of the project site.

LA-01794

This study was undertaken by Robert J. Wlodarski in 1989 for the proposed Sunset Pumping Plant and Force Main Project. The study included a pedestrian survey along the south side of PCH between Sunset Boulevard and Temescal Canyon. The survey was conducted as a reconnaissance that focused on open

space areas and the margins of existing developments (e.g., roads, parking lots, underground utilities). The survey included the portion of PCH opposite two prehistoric archaeological sites (P-19-000134 and P-19-000219) that were previously identified in 1912 and 1950 south of the project site. The surface inventory did not identify any archaeological sites. Wlodarski cites the lack of subsurface exploration as an important factor constraining the applicability of the survey results for assessing sensitivity across the study area. He concludes that there is still potential for buried archaeological sites to be present below disturbances (Wlodarski 1989:10).

Previously Recorded Cultural Resources

Four archaeological sites were identified by the CHRIS search, none of which intersect the project site (Table 2, Figure B-1)[2]. Two of the sites identified are described as Native American village sites (P-19-000134 and P-19-000219). Site P-19-100497 was also recorded as a prehistoric archaeological site, although it was composed entirely of shell midden believed to have been re-deposited as fill from another location. The fourth site identified is a historical building. The three prehistoric archaeological sites have not been evaluated for listing in the CRHR or otherwise assessed as tribal cultural resources. These resources are described in more detail below.

Table 2. Previously Recorded Cultural Resources within 0.5 mile of the Project Site

Primary No.	Trinomial	Time Period	Resource Description	Name	Recording: Year (Name, Affiliation)	Proximity to Project Site
P-19-000134	CA-LAN-000134	Prehistoric	Site	Nelson #2	1912 (Nelson); 1950 (Eberhart, UCLA).	Outside
P-19-000219	CA-LAN-000219	Prehistoric	Site	LA-60	1950 (Eberhart, UCLA)	Outside
P-19-003192	CA-LAN-003192H	Historic	Building, Site	Paulist Productions/Thelma Todd Roadside Cafe	2004 (Robert Wlodarski, HEART)	Outside
P-19-100497	—	Prehistoric, Unknown	Other	Redeposited shell midden	2004 (M. Mealey, Cal State Parks)	Outside

P-19-000134 / P-19-000219

Site P-19-000134 was first reported in 1912 by N.C. Nelson, who provided only limited information about the contents and location of the materials. Nelson described the site as a "refuse heap" measuring 250 feet in diameter and located at the mouth of Santa Ynez Canyon, on the east side of the stream crossed by the wagon road. Nelson speculated that archaeological deposits may extend 2 feet below the surface and added that "no artifacts were found," which Bissell (1999:5) believes meant the site was a shell midden (i.e., composed only of discarded shells), though Nelson did not explicitly state as much.

In 1950 H. Eberhart recorded P-19-000219 as a prehistoric village site measuring 100 × 150 × 300 feet (30.4 × 45.7 × 91.4 m) and a depth of 36 inches (0.9 m). At some point, the site form for P-19-000219 was appended and re-designated as P-19-000134, though the same site record for P-19-000219 was retained, so that the two sites have essentially the same description but different boundaries, located east and west of each other on the north side of PCH (Figure B-1). Eberhart's appended note in the form for P-

[2] Maps depicting the location of archaeological sites identified in the records search and the associated resource records have been included here as confidential attachments (Appendix B and Appendix C) that are not to be publicly distributed.

19-000134 states that P-19-000219 was assigned to the "higher (elevation) portions." The site description—the one originally written by Eberhart for P-19-000219 but now ascribed to both boundaries—notes evidence of midden and fire, and identified points, scrapers, metates, manos, and pestles. Eberhart apparently collected 13 artifacts (from P-19-000219), which were later studied by Ruby (1961) who used the materials to place the site(s) within the Milling Stone Horizon (4000 to 1000 BC), and described the materials as typical of coastal sites. Discussion of the two sites in subsequent archaeological studies have acknowledged that they may represent two portions of one larger village site (e.g., Wlodarski 1989), though others note that each one was reported to have different contents—one as a shell midden and one with a diverse artifact assemblage—and were mapped in different locations, even if only slightly different (see Bissell 1999:5).

Eberhart's 1950 site record includes a note stating the following: "During the fall of 1953 this site was hauled away during construction of what is apparently going to be a filling station. As far as I can tell from surface observation, no site remains at all." Most of P-19-000134 and P-19-000219 are developed as PCH, surface parking lots, commercial and residential properties, and landscaping (Figure B-2). While surface reconnaissance has not identified any artifacts remaining within the two boundaries, cultural resource studies conducted along PCH have noted the potential for subsurface remains below the disturbances (see Dillon 1986), particularly in the small portions of the site boundaries subject to less intensive development. For P-19-000134 and P-19-000219 this remains unsubstantiated as no archaeological studies have been conducted to confirm the presence or absence of a subsurface component on either site.

The sequence of disturbances to the site boundaries and surrounding areas are visible in aerial photographs from the middle twentieth century. The earliest aerial photograph of the area is from 1927 and shows the location of the two sites in what appears to be a minimally modified setting (Figure B-3), similar to what would have existed in 1912 when Nelson first identified P-19-000134 on the surface. PCH is visible as a two-lane road, located slightly south of its current alignment. The image shows the plotted location of the sites in what appears to be a mixture of dunal sand deposits, alluvium deposited from Santa Ynez Creek, and colluvial sediments eroding from the adjacent terrace to the north. Patchy vegetation can be seen in large portions of each site, which would have partly stabilized the dune and other sediments on the slopes. By 1944 PCH was expanded and aligned to its current position, which cut into the adjacent hillsides and removed large portions of P-19-000134, as well as the southern portions of P-19-000219 (Figure B-4). After 1953 and continuing through the 1960s substantial development occurred along PCH and Sunset Boulevard, including a major cut into the southwest portion of the terrace within P-19-000134 and development of the west half of P-19-000219 (Figure B-5). Changes to the two site locations since the early 1970s have largely occurred along PCH and within areas already modified.

P-19-100497

Site P-19-100497 was recorded in 2004 by a California State Parks archaeologist who described the site as redeposited shell midden brought with fill-dirt used to level an area. The resource form does not state how the shell was distinguished as midden (i.e., resulting from human activity) versus natural concentration of shell. The fill at the site location is described as 25 to 35 feet (7.6 to 10.6 m) thick and was reported to have been transported to the location in the late 1960s and early 1970s. The site record states that according to the geological reports for the area, the fill was brought in from different locations in the surrounding areas (speculated to be Pacific Palisades), but the exact source is unknown. Even though the material was believed to be redeposited, the site was considered to have a high potential to contain important or sacred items, and the author recommended archaeological monitoring for any subsurface work.

Archival Research

The project site was documented within the boundaries of Rancho Boca de Santa Monica, granted in 1839. An early map of the land grant shows "Punta de Topanga" approximately 1.5 miles (2.41 km) west of the project site. This may be an indication of the location of the village of Topaa'nga, though like other Native American villages in the Los Angeles area, it is likely that the location changed periodically over time. George Kirkman's (1938) map of historical sites ca. 1860–1937 (also known as the Kirkman-Harriman map) places a Native American village more than 2 miles (3.2 km) east of the project site along a stream, along with one approximately 6 miles (9.6 km) northwest in the middle of Topanga Canyon. It does not identify any settlement where Topaa'nga is thought to be, but this map is only intended as a representational depiction of these locations to convey a general sense of significant historical areas, rather than explicit geographic points. It does, however, illustrate a general pattern of Native American occupation around rivers and streams, which would have provided important resources during prehistoric times.

Historical topographic maps and photographs show the vicinity of the project site was undeveloped until at least 1944 (Figure A-11 and Figure A-12). In 1927 the project site and surroundings appear to be largely undeveloped. Natural stream courses can be seen cutting through the Santa Ynez Creek floodplain between the project site and former alignment of Sunset Boulevard, suggesting the project site was characterized by naturally deposited sediments. By 1944 the basin of Santa Ynez Canyon appears to have been partially filled as part of the realignment and expansion of Sunset Boulevard. At this point the lower elevations of the project site appear to have been artificially filled. As previously discussed, PCH was also expanded and cut into the adjacent hillside. The 1944 aerial shows significantly more vegetation growth within the Santa Ynez Canyon and the project site (some portion of which would have included invasive species). The subsequent decades saw significant development including construction of roads and commercial and residential tracts, though the project site and the adjoining lot to the north remained vacant into the early 1970s (Figure A-14).

The parcel lies in what was once the Inceville Movie Studios of Thomas H. Ince. For production of the western films, Ince would hire hundreds of Oglala Sioux from the Pine Ridge Reservation who would establish camps in Santa Ynez Canyon. During their stay the Sioux followed their traditional lifeways, within the Inceville community. The exact location of the camps is unknown. Any sites, features, or objects associated with the Sioux encampments may be considered tribal cultural resources. By 1922 Inceville was moved to Culver City and the original site abandoned and burned. The 1927 aerial photographs shows the opening of Santa Ynez Canyon devoid of buildings, with only a few ruins remaining of the large and ornate film sets that dotted its hills. It wasn't until the early 1950s that the area was developed (Figure A-12), with the project site first developed in 1972 with the current building (Figure A-14).

NATIVE AMERICAN COORDINATION

Sacred Lands File Search

On August 27, 2018, the results of an SLF search were received from the NAHC. The NAHC results letter indicated that there are no sacred sites in the SLF documented within the project site. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of 16 Native American contacts and suggested contacting them to provide information on sacred lands that may not be listed in the SLF. Eight of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as

part of compliance with AB 52 (PRC Section 21082.3), described below. The NAHC letter is included in Appendix D.

AB 52 Notification and Consultation

As lead agency, the City mailed letters on February 21, 2018 to the Native American tribes identified by the NAHC and included on the City's AB 52 notification list, pursuant to PRC Section 21082.3 (Table 3). Copies of the letters are included in Appendix E. One response was received on March 5, 2018, from the Gabrieleño Band of Mission Indians–Kizh Nation, who requested that they be consulted before the project proceeded. The City acknowledged the request and initiated consultation after March 5, 2018. The City and Tribe corresponded through phone conference and email, during which time the Tribe submitted additional documents to support their concern about the Project area being sensitive. The consultation was completed on January 4, 2019 with a letter sent by the City, summarizing the findings. First, after acting in good faith and after reasonable effort, mutual agreement could not be reached between the City and the Tribe for purposes of AB 52. Second, the City found substantial evidence existed to support a conclusion that the Project may cause a significant impact on tribal cultural resources, for which mitigation measures and a Condition of Approval for inadvertent discovery were created and attached to the letter. Third, the City found that the mitigation measures would mitigate potential significant impacts. Dates and responses to the City's AB 52 notification are shown below (see Table 3). The City's letter of findings is included in the Appendix E. Responses to the notification are considered confidential and are included here as Appendix F.

Table 3. Native American Outreach Results

Native American Contact	City Planning Consultation Effort	Tribal Response
Gabrielino/Tongva Nation, Ssandonne Goad, Chairperson	**February 21, 2018:** Letter sent by U.S. Mail	No response.
Gabrielino/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson	**February 21, 2018:** Letter sent by U.S. Mail	No response.
Gabrielino-Tongva Tribe, Charles Alvarez	**February 21, 2018:** Letter sent by U.S. Mail	No response.
Gabrieleño Band of Mission Indians—Kizh Nation, Andrew Salas, Chairperson	**February 21, 2018:** Letter sent by U.S. Mail; **March 5, 2018 – January 4, 2019:** correspondence via phone conference and email; **January 4, 2019:** Letter sent completing consultation. Mitigation measures and Condition of Approval attached.	**March 5, 2018:** Letter sent to Kenton Trinh with request that they are consulted before the project continues. **March 5, 2018 – January 4, 2019:** correspondence via phone conference and email.
Gabrielino Tongva Indians of California Tribal Council, Robert F. Dorame, Chairperson	**February 21, 2018:** Letter sent by U.S. Mail	No response.
San Fernando Band of Mission Indians, Donna Yocum, Chairperson	**February 21, 2018:** Letter sent by U.S. Mail	No response.

Native American Contact	City Planning Consultation Effort	Tribal Response
Fernandeño Tataviam Band of Mission Indians, Jairo Avila, Tribal Historic and Cultural Presercation Officer	**February 21, 2018:** Letter sent by U.S. Mail	No response.
Fernandeño Tataviam Band of Mission Indians, Rudy Ortega, Tribal President	**February 21, 2018:** Letter sent by U.S. Mail	No response.

SENSITIVITY ASSESSMENT

Tribal Cultural Resources

A confidential CHRIS records search did not identify any tribal cultural resources within the project site, but three prehistoric (i.e., Native American) archaeological sites were identified within a 0.5-mile (0.8-km) radius. The SLF search returned by the NAHC was negative for sacred lands and sites. The nearest Gabrielino place names referenced in ethnographic and historical literature is Topaa'nga. Though the precise location of this community is not known, the available information suggests the villages is located between 2.4–3.2 km (1.5 and 2 miles) away. The closest permanent historical water source to the project site is Topanga Creek, currently located approximately 2.4 km (1.5 miles) to the west. There are no known springs within the project site, but Santa Ynez Creek does flow down Santa Ynez Canyon, and historically was a seasonal stream that ran to the ocean.

One of the three sites identified in the CHRIS search, P-19-100497, is described as shell midden that was redeposited as fill from another location. The two other sites, P-19-000134 and P-19-000214, are located approximately 150 m (492 feet) south of the project site. P-19-000134 was documented in 1912 and updated in 1950 when P-19-000214 was recorded. It is not clear whether the two sites are both parts of a single, larger Native American village site, or if the respective boundaries contained different materials. Between the two site records, archaeologists identified midden (probably shell), points, scrapers, metates, manos, pestles and evidence of fire, which have been dated to the Milling Stone Horizon (4000 to 1000 BC). The sites are believed to have been mostly destroyed through various developments, especially road grading for the development of PCH and construction of a gas station at the intersection with Sunset Boulevard, though the potential for materials to remain buried beneath these disturbances has not been verified through archaeological testing. The records for P-19-000134 and P-19-000214 do not specify whether the project site was included in the same survey that identified the two archaeological sites, either in 1912 or 1950. In 1979 a pedestrian survey was conducted in the parcel adjoining the project site to the north, which did not identify any cultural resources. At this time the project site was already developed as a fast-food restaurant and parking lot. Aerial photographs taken prior to development of the project site show that both parcels had been covered with artificial fill as part of the construction of Sunset Boulevard. Therefore, the survey was unlikely to have identified any tribal cultural resources in that location.

Previously conducted studies identified in the CHRIS records search describe archaeological sites found east and west of the project site that are similar in age, contents, and setting, i.e., the southern, ocean-facing side of an alluvial terrace. Though not mentioned in any of the studies referenced in the CHRIS results, significant prehistoric archaeological sites were also identified in the Ballona Creek area along the base of an alluvial terrace near the ocean at the point where the Los Angeles River discharged into the Ballona wetland (Homburg et al. 2014:12). Among the studies that assess the archaeological sensitivity of the Santa Ynez Canyon (specifically) or these coastal settings (in general), there is a consensus that the

canyon outlets were intensively utilized by Native Americans and are highly sensitive for cultural resources being present, at least prior to historical developments. This finding is supported for the project site by the relatively close proximity to P-19-000134 and P-19-000214. These same studies also highlight the variable nature of archaeological preservation and constraints of fieldwork for determining whether any such sites may be extant. Specifically, many of these coastal sites were originally identified on the surface by archaeologists in the early- to mid-twentieth century, which were then subject to varying levels of disturbance from road grading and other developments throughout the later part of the twentieth century. Therefore, more detailed site-specific analysis is required to assess the subsurface preservation potential within the project site and establish the overall sensitivity for the presence of tribal cultural resources within a given area.

Generally, tribal cultural resources that are archaeological in nature have the highest likelihood of preservation within low-energy depositional sedimentary environments where the sediments are correlated with the period of human occupation in North American, i.e., Upper Pleistocene or Holocene epochs. Buried tribal cultural resources can also occur below Historic-period disturbances or underneath redeposited artificial fill, as demonstrated by studies along PCH. In some cases, Native American sites, features, and objects can also be intermixed with artificially deposited sediments.

Within the project site, the highest potential for tribal cultural resources preservation is within the colluvial sediments identified underneath artificial fill and above middle Miocene sedimentary bedrock formed between 23.0 and 5.3 million years before present. Furthermore, this potential is highest along the lower elevations and not within the steep backslope. The geotechnical study conducted for the project site identified artificial fill across the surface of the entire project site, ranging between 0.6 and 1.5 m (2 and 5 feet) deep, which is deepest at lower elevations in the northwest portion of the site. The underlying colluvium measures between 1 and 3 feet in thickness and was described as a silty clayey sand with angular to rounded gravel inclusions. The colluvium identified on the backslope test trenches seems to include a higher percentage of larger sized gravels, which is typical of higher energy deposition and expected along the steeper grade. Steep hillsides showing relatively thin zones of high-energy deposition are much less likely to have tribal cultural resources preserved. As a result, the sensitivity for tribal cultural resources within the backslope is found to be low. The area of highest preservation potential lies primarily within the colluvium found at the lower elevations within the project site.

As previously discussed, the original surface of the project site was covered with artificial fill (at least by the 1940s) and then developed as the current fast-food restaurant and parking lot in the 1970s. It is unclear to what extent these developments disturbed the natural, colluvial sediments that had formerly defined the surface; however, it is very likely that any archaeological features, or objects that once existed on the surface or near-surface were likely destroyed by these developments. For this reason, the overall potential for preservation of tribal cultural resources is reduced.

Beginning in 1912, the project site was developed as part of the Inceville/Bison 101 Ranch movie studios. This involved numerous film sets and production buildings, as well as a long-term encampment of Sioux tribal members. These Sioux continued to practice their traditional lifeways, including living in traditional tipis. Any associated site, features, or objects could be considered a tribal cultural resource. The movie studio and its associated buildings were burned down in 1922, and the project site was not redeveloped until 1972 with the commercial property and parking lot currently extant. The exact location of the Sioux camp within Santa Ynez Canyon is unknown and given the entire area in which it may have been located, it is considered to have a low sensitivity for associated remains being preserved in natural or disturbed soils within the project site.

To summarize, Prehistoric-period archaeological materials were documented in 1912 and 1950 as two sites located approximately 150 m (492 feet) south of the project site, on the south-facing side of an

alluvial terrace. Natural resources used by Native Americans would have been abundant within Santa Ynez Canyon and along the Pacific Ocean, in general. Both of these suggest favorable conditions for Native American habitability within the project site. The eastern portion of the project site contains some colluvial deposits that appear capable of preserving physical remains from any Native American sites, features, or objects that may have once existed as a surface deposit or been shallowly buried. These increases are offset by the historical disturbances to the overall physical setting and generally lower probability that a tribal cultural resource would have been located directly on a steep slope. Therefore, considering the information available on Native American settlement patterns for the vicinity of the project site, historic disturbances, and soil data for the project site, SWCA finds the project site has a low to moderate sensitivity for containing unidentified tribal cultural resources.

CONCLUSION

A CHRIS and SLF search revealed that no known tribal cultural resources are present within the project site. SWCA assessed the sensitivity for the project site to contain unidentified tribal cultural resources and determined it to be moderate. The City submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. The Gabrielino Band of Mission Indians–Kizh Nation responded and requested formal consultation. The response letter, subsequent correspondences, and consultation include no discussion of specific known tribal cultural resources being present within the project site. Excavation proposed for the project involves complete excavation of native soils underlying the artificial fill. The deepest level of excavation proposed is estimated to be 12 m (40 feet) in the eastern portions of the project site, where artificial fill was observed no more than 0.9 m (3 feet) below grade.

The likelihood for encountering unidentified tribal cultural resources exists only within the colluvial sediments situated between the artificial fill and bedrock. The potential for unidentified tribal cultural resources within the project site is found to be moderate. Specifically, there is a likelihood that material remains from a Native American camp are present in the project site, which would have cultural value to a California Native American tribe. If present, the site could be used to answer important research questions, would be considered eligible for listing in the CRHR under Criteria 4, and therefore meet the definition of a tribal cultural resource under CEQA. The project is subject to the City's standard condition of approval for Tribal Cultural Resources Inadvertent Discovery, which provides a protocol in the event of a discovery. However, considering that such a resource would qualify for the CRHR, that the project site has not been previously inspected for the presence of the resource below the surface, the moderate sensitivity for the presence of the resource, and the subtle nature of the features and objects potentially present, SWCA recommends the mitigation measures outlined below to ensure that any such resources are properly identified and preserved. Implementation of these measures would reduce potentially significant impacts to tribal cultural resources to a less-than-significant level.

- **MM TCR-1: Retain a Qualified Archaeologist.** Prior to the issuance of a demolition permit, the project proponent shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology, during the excavation phase to carry out and ensure proper implementation of the mitigation measures related to tribal cultural resources. The qualified archaeologist shall submit a letter of retention to the project proponent and City of Los Angeles Department of City Planning (the City) no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.
- **MM TCR-2: Worker Environmental Awareness Program (WEAP) Training.** Before the commencement of initial demolition or excavation at the project site, the retained qualified archaeologist or their designee shall provide a WEAP training to on-site project personnel responsible for supervising demolition and excavation (i.e., foreman or supervisor) and machine

operators. The WEAP training shall brief construction crews regarding the regulatory compliance requirements and applicable mitigation measures that must be adhered to during demolition and excavation activities for the protection of tribal cultural resources. As an element of the WEAP training, the qualified archaeologist or their designee shall advise the construction crews on proper procedures to follow if an unanticipated tribal cultural resource is discovered during construction. The qualified archaeologist or their designee shall also provide the construction workers with contact information for the qualified archaeologist and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of tribal cultural resources that would require notification of the archaeologist, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, project proponent, or their designated project supervisor. Within 5 days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the project proponent and the City.

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APPENDIX A.
REPORT FIGURES

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Figure A-1. Project site and vicinity within Los Angeles County.

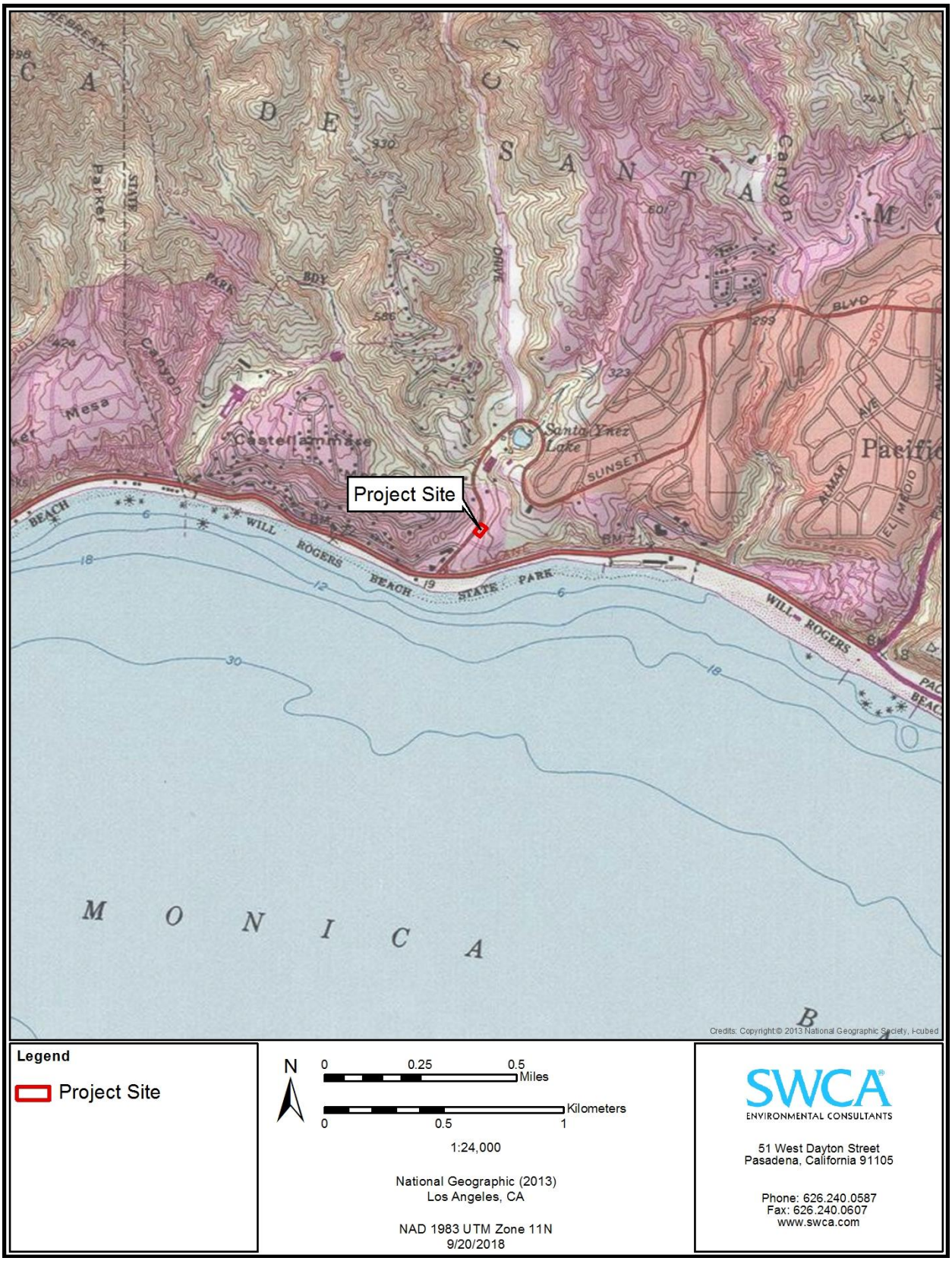

Figure A-2. Project site and 0.5-mile radius plotted on USGS Topanga Canyon, California, 7.5-minute topographic quadrangle.

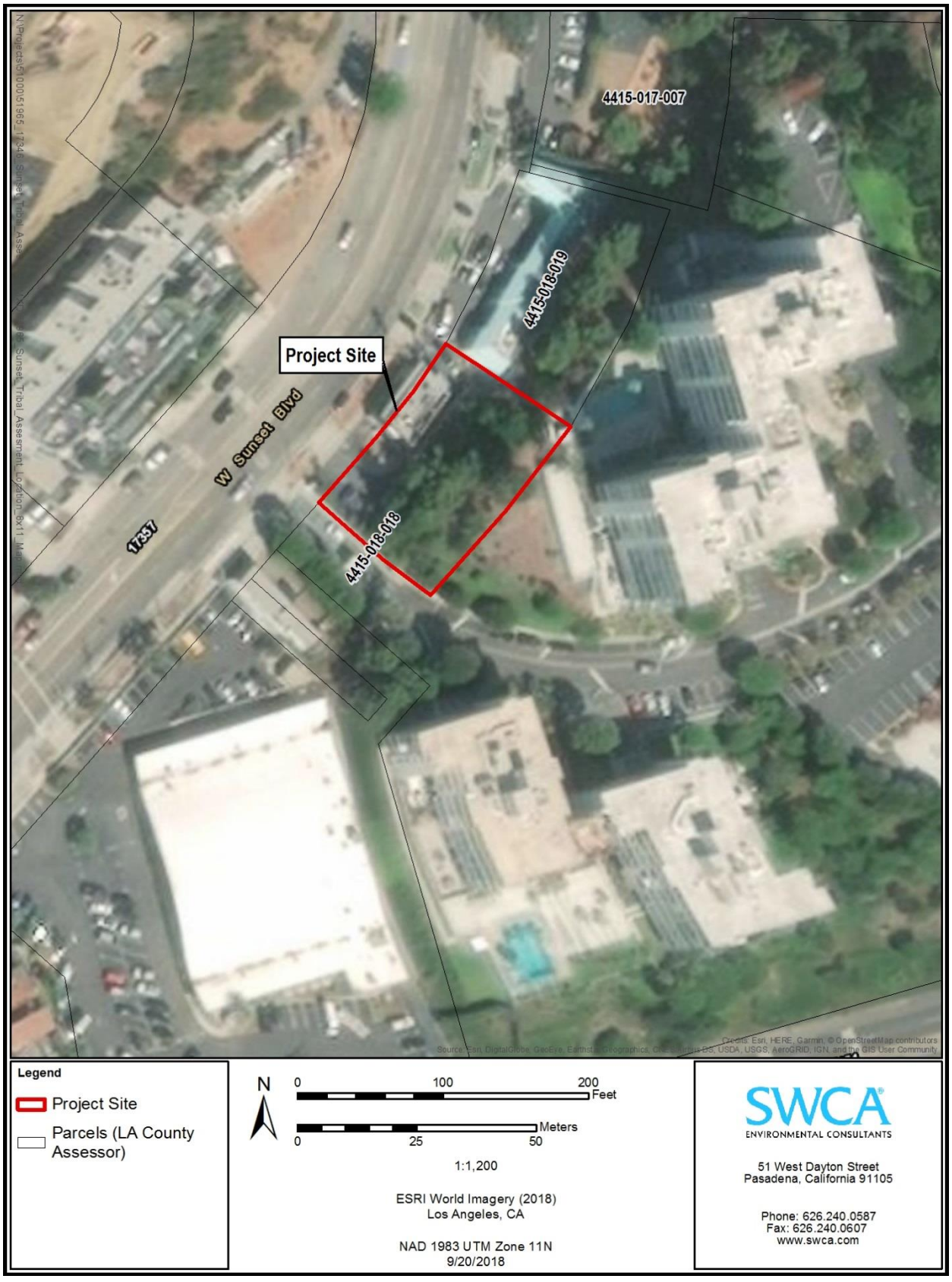

Figure A-3. Project site on a 2016 aerial photograph with parcel boundaries and streets.

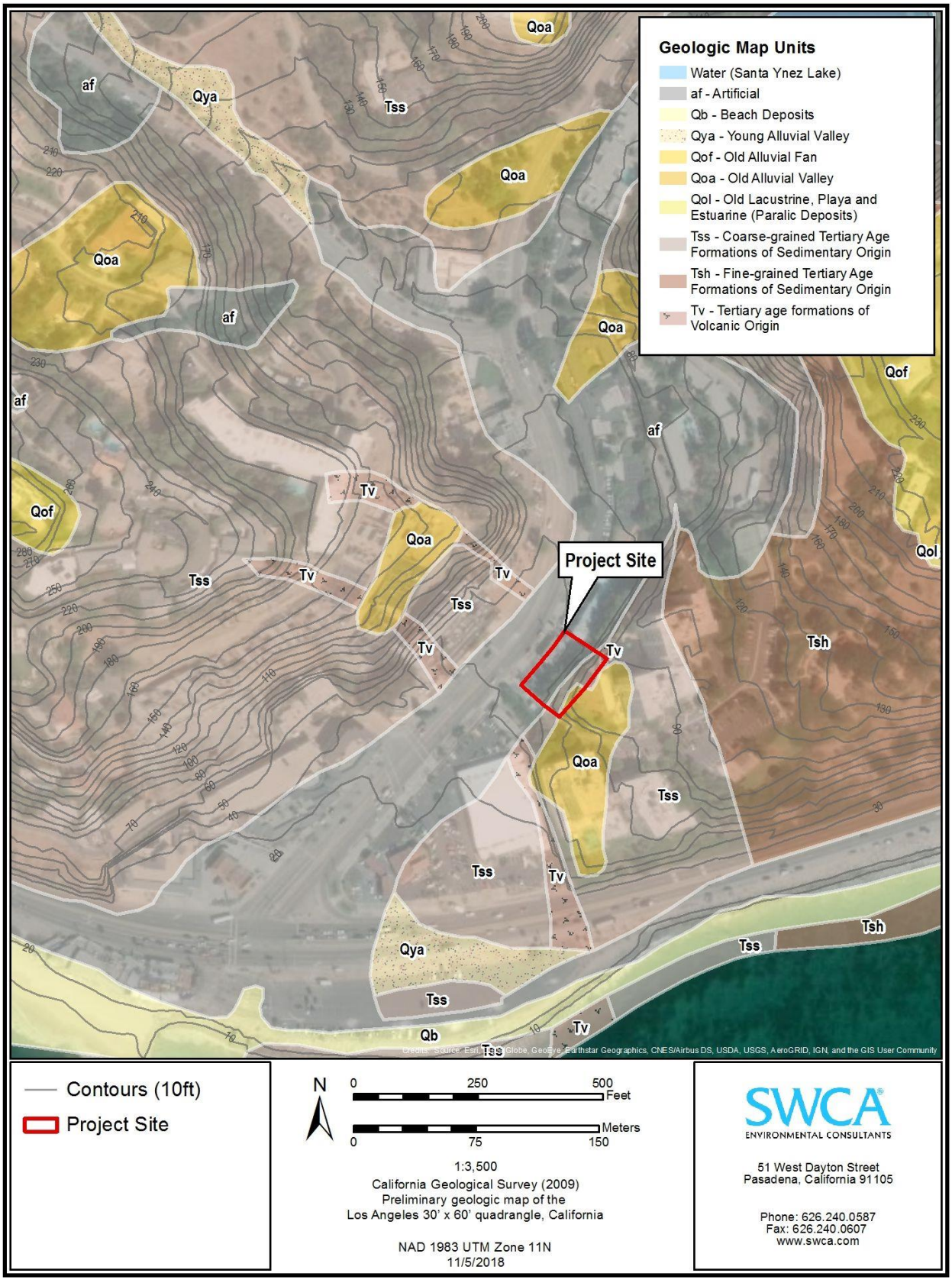

Figure A-4. Geologic formations in the project site and vicinity.

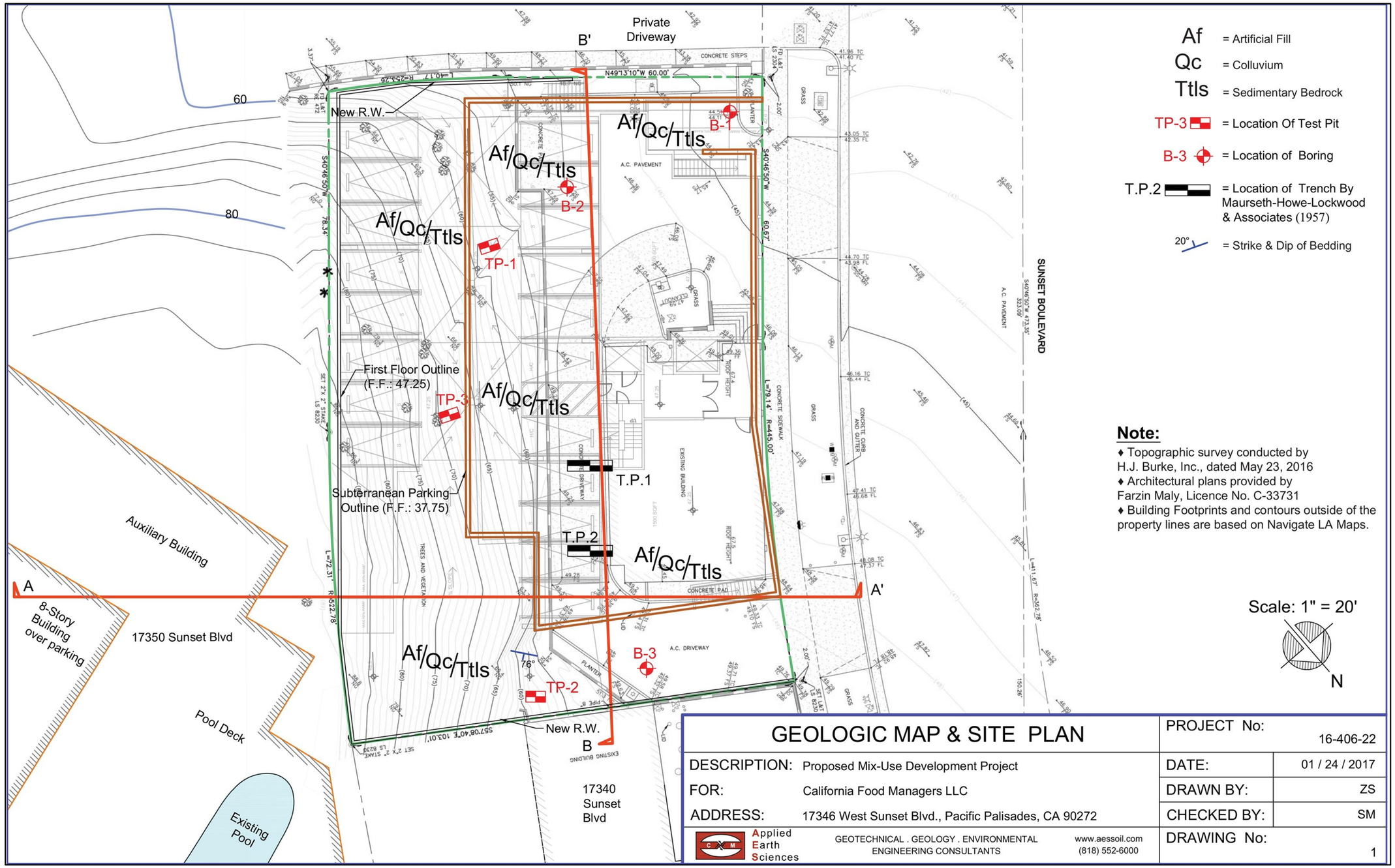

Figure A-5. Geologic map and site plan taken from geotechnical study by Applied Earth Sciences (Minas and Minas 2017). The two cross sections are depicted as redlines (A-A' and B-B'). (Note the scale has been altered to fit page.)

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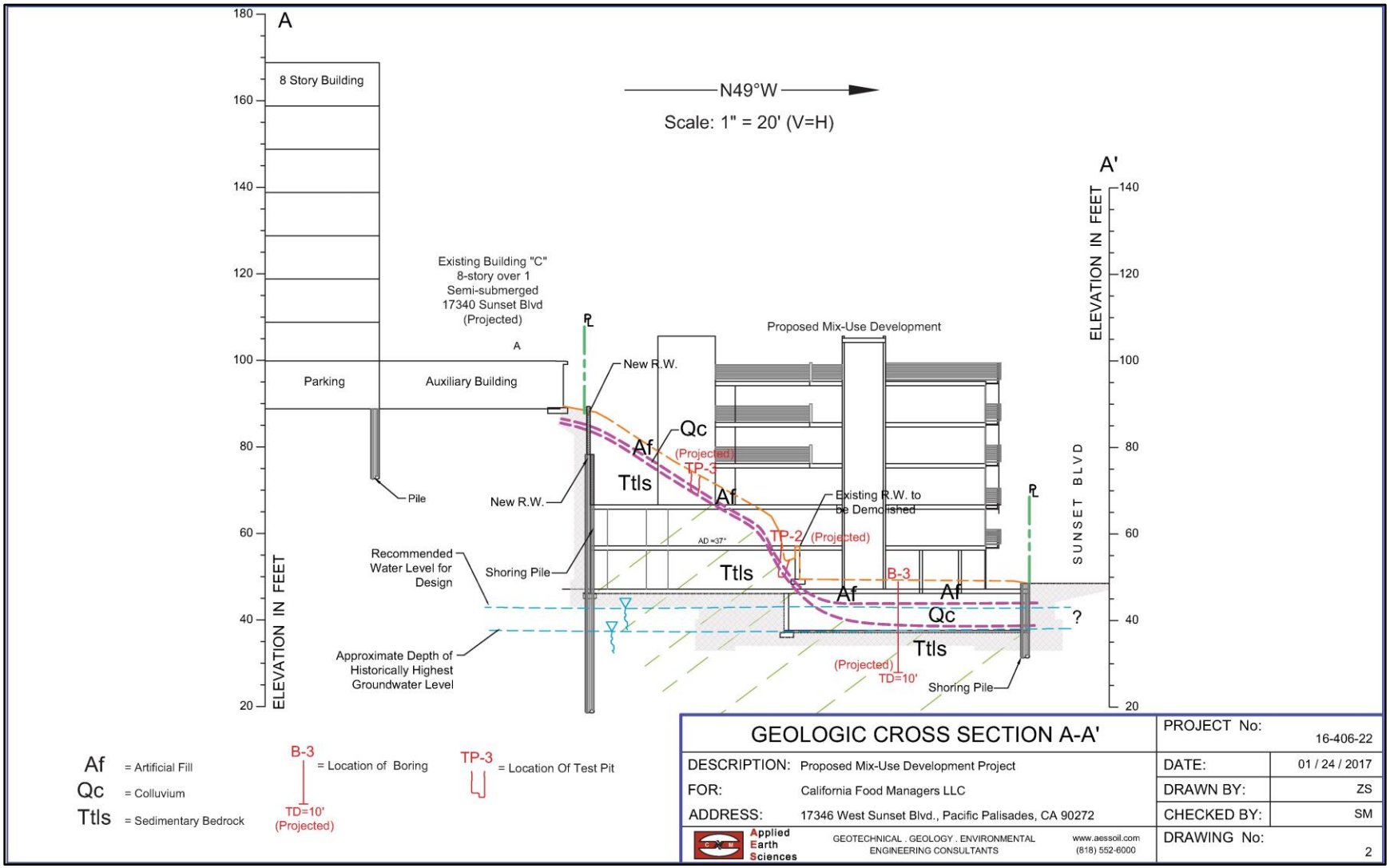

Figure A-6. Geologic cross section A-A’ taken from geotechnical study by Applied Earth Sciences (Minas and Minas 2017). The cross section shows the hillside in profile.

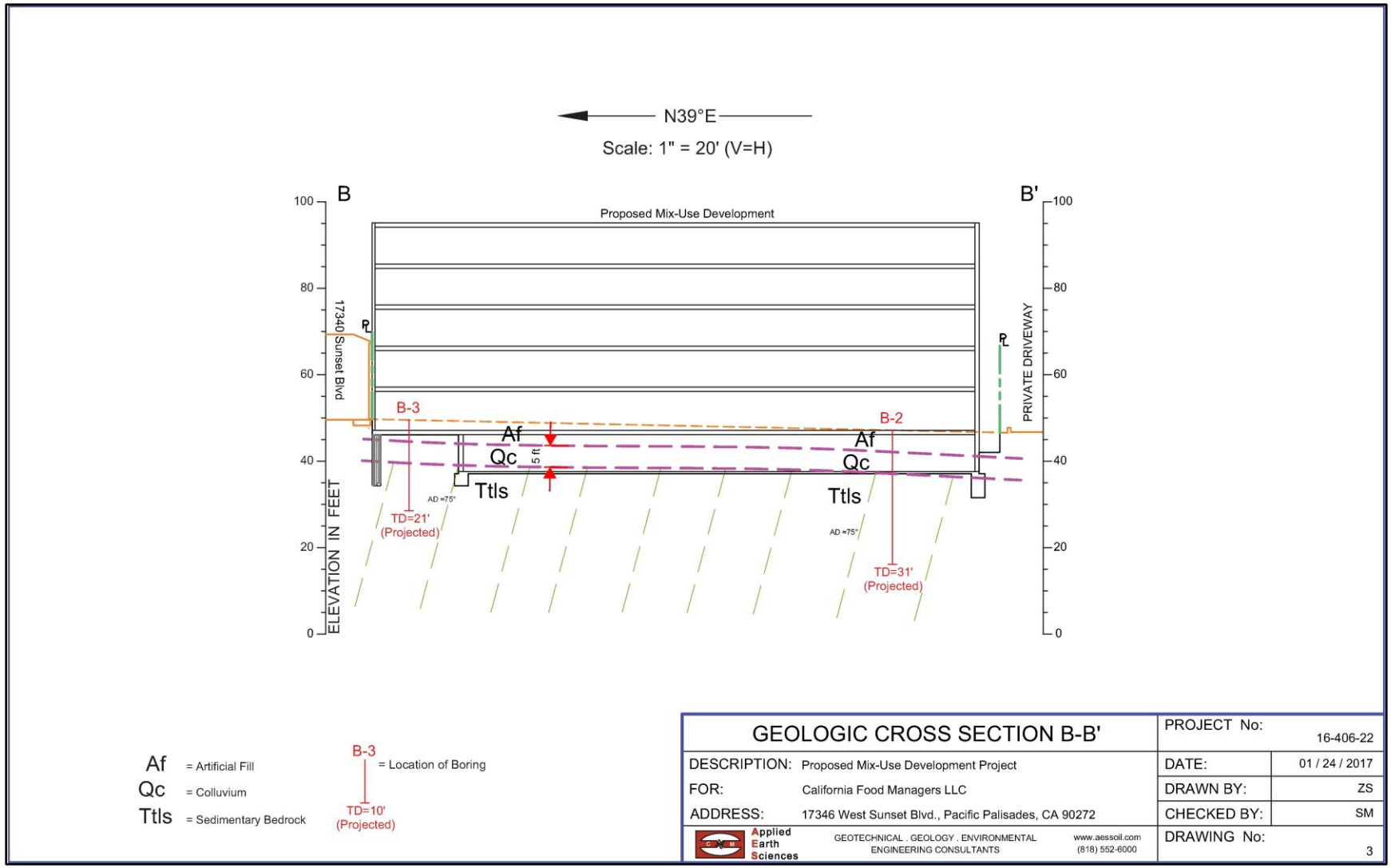

Figure A-7. Geologic cross section B-B’ taken from geotechnical study by Applied Earth Sciences (Minas and Minas 2017). The cross section shows the setting across the base of the slope. Note the 5-foot-thick stratum of Quaternary colluvium (QC) situated between the artificial fill (Af) and sedimentary bedrock (Ttls).

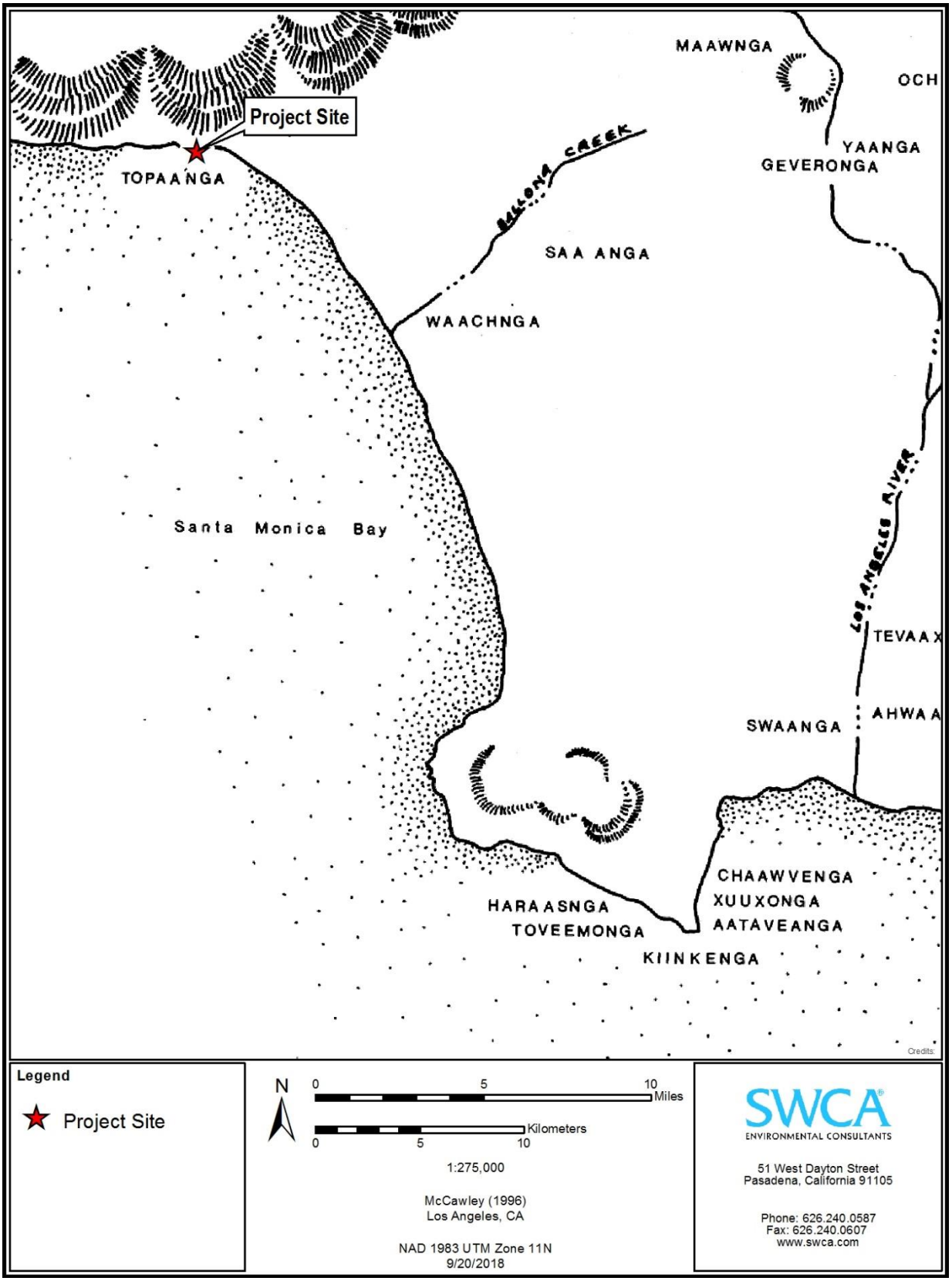

Figure A-8. Project site plotted on McCawley's (1996:36) map showing the approximate location of villages based on Gabrielino ethnographic sources.

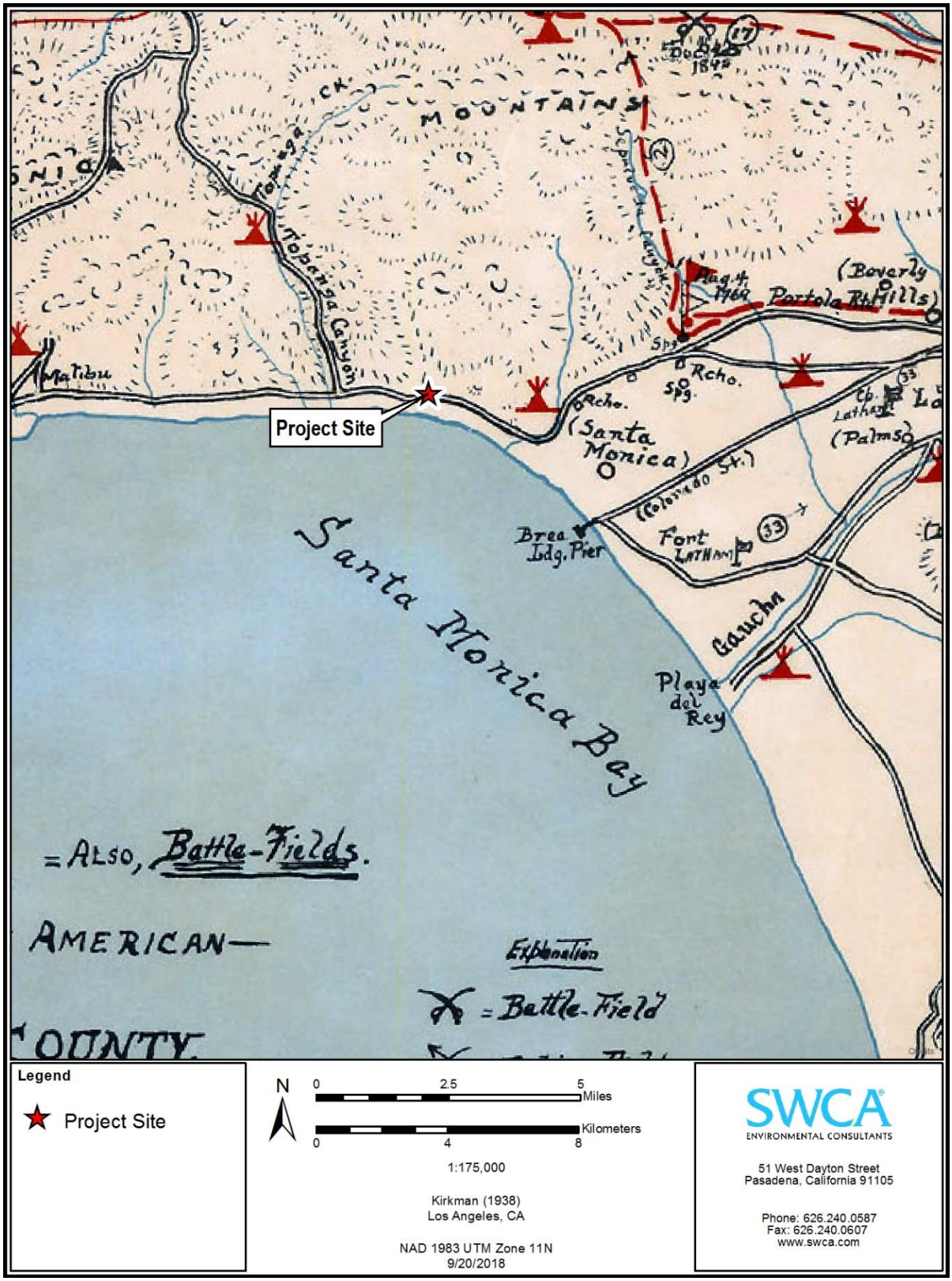

Figure A-9. Kirkman-Harriman's *Pictorial and Historical map of Los Angeles County, 1860–1937*. Historical sites and features are depicted with symbols to indicate representational rather than explicit geographic locations.

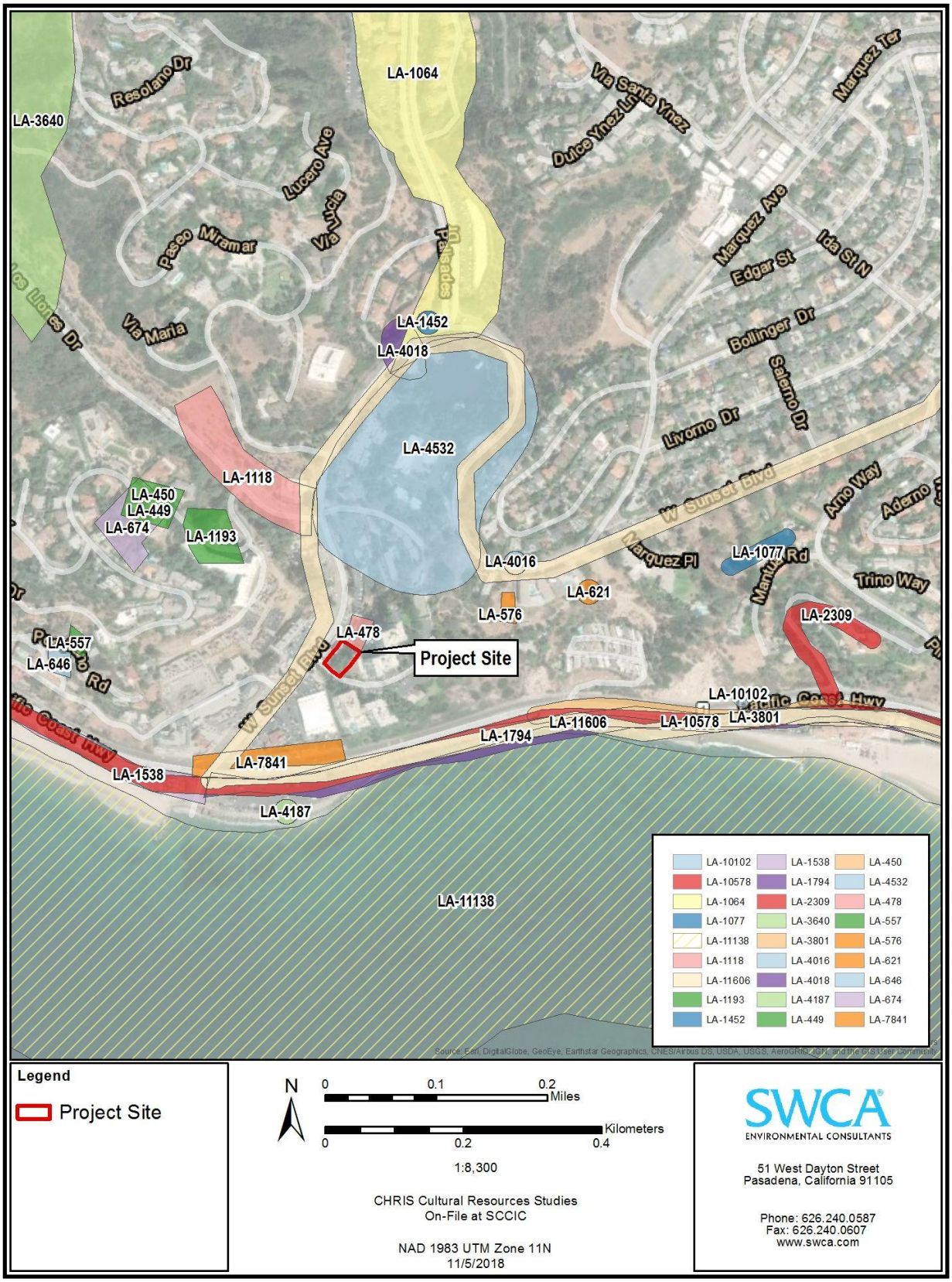

Figure A-10. Cultural resource studies conducted within a 0.5-mile radius of the project site.

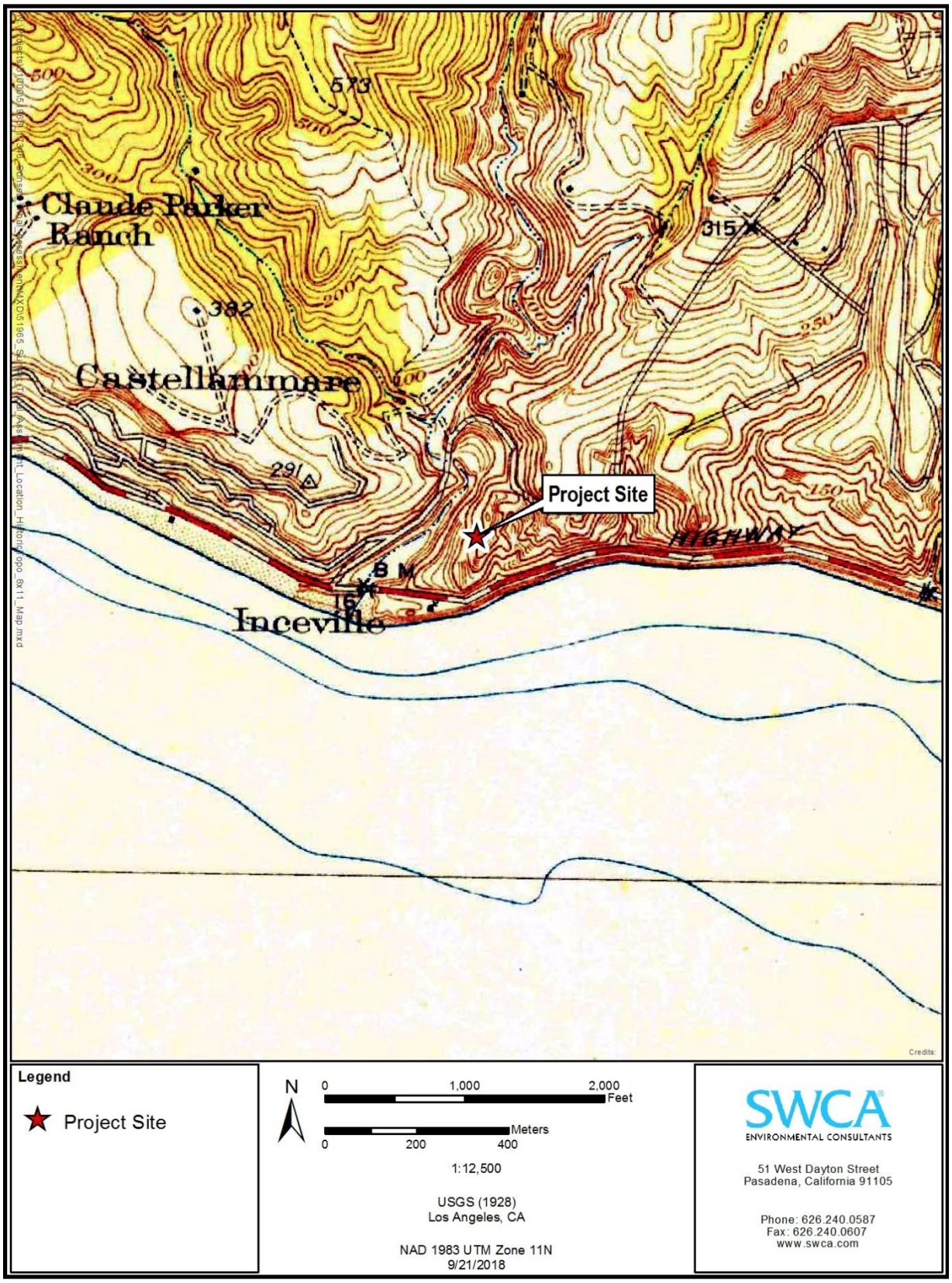

Figure A-11. Project site plotted on the USGS 1928 Topanga Canyon, California, 7.5-minute topographic quadrangle.

Figure A-12. Project site and surroundings depicted on a 1927 aerial photograph.

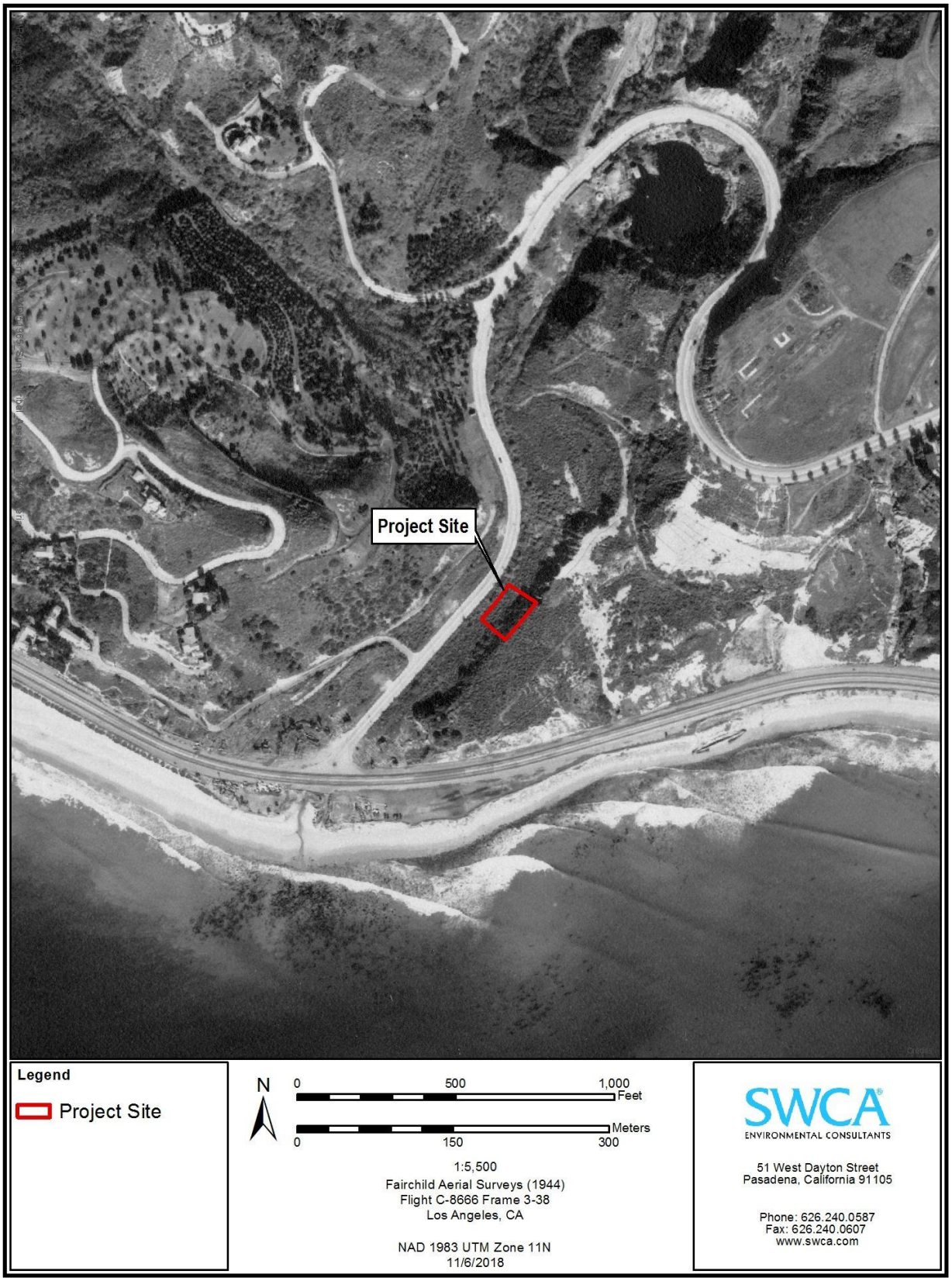

Figure A-13. Project site and surroundings depicted on a 1944 aerial photograph.

Figure A-14. Project site and surroundings depicted on a 1971 aerial photograph.

APPENDIX B.
CONFIDENTIAL REPORT FIGURES

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APPENDIX C.
CONFIDENTIAL CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM (CHRIS) RECORDS SEARCH RESULTS

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APPENDIX D.
NATIVE AMERICAN HERITAGE COMMISSION (NAHC) SACRED LANDS FILE SEARCH

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STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471

August 27, 2018

Kenton Trinh

City of Los Angeles

Sent by Email: kenton.trinh@lacity.org

Re: 17346 W. Sunset Blvd., Los Angeles County

Dear Mr. Trinh,

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 preclude the presence of cultural resources in any project area. Other sources for cultural resources should also be contacted for information regarding known and/or recorded sites.

Enclosed is a list of Native Americans tribes who may have knowledge of cultural resources in the 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 to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at 916-573-1033 or frank.lienert@nahc.ca.gov.

Sincerely,

Frank Lienert
Associate Governmental Program Analyst

Native American Heritage Commission
Native American Contacts
August 27, 2018

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Kenneth Kahn. Chairperson
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kkahn@santaynezchumash.org
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Gabrieleno/Tongva San Gabriel Band of Mission Indians
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Rudy Ortega Jr.. Tribal President
1019 Second Street. Suite 1 — Fernandeno
San Fernando , CA 91340 — Tataviam
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Kern Valley Indian Community
Robert Robinson. Chairperson
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(760) 378-2915 Cell

Kitanemuk & Yowlumne Teion Indians
Delia Dominguez. Chairperson
115 Radio Street — Yowlumne
Bakersfield , CA 93305 — Kitanemuk
deedominguez@juno.com
(626) 339-6785

Gabrielino-Tongva Tribe
Linda Candelaria. Chairperson
No Current Address on File — Gabrielino

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

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed 17346 W. Sunset Blvd., Los Angeles County

Native American Heritage Commission
Native American Contacts
August 27, 2018

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(951) 654-4198 Fax

San Manuel Band of Mission Indians
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Barbareno/Ventureno Band of Mission Indians
Eleanor Arrellanes
P.O. Box 5687 Chumash
Ventura , CA 93005
(805) 701-3246

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos. Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
(805) 427-0015

Gabrielino-Tongva Tribe
Charles Alvarez. Councilmember
23454 Vanowen St. Gabrielino
West Hills , CA 91307
roadkingcharles@aol.com
(310) 403-6048

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

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed 17346 W. Sunset Blvd., Los Angeles County

APPENDIX E.
NON-CONFIDENTIAL NATIVE AMERICAN COORDINATION DOCUMENTS

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NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916) 373-3710

June 20, 2018

Kenton Trinh
City of Los Angeles

Sent by E-mail: Kenton.trinh@lacity.org
Cc: sherrie@ceqa-nepa.com

RE: Proposed 17346 Sunset Project, Community of Brentwood – Pacific Palisades; Topanga USGS Quadrangle, Los Angeles County, California

Dear Mr. Trinh:

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

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

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

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

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

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

   - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
   - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
   - If the probability is low, moderate, or high that cultural resources are located in the APE.
   - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
   - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

   - Any report that may contain site forms, site significance, and suggested mitigation measurers.

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

3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. A search of the SFL was completed for the project with negative results.

4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

5. Any geotechnical reports regarding all or part of the potential APE.

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

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

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

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

Sincerely,

Gayle Totton

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

Native American Heritage Commission
Tribal Consultation List
Los Angeles County
6/20/2018

Fernandeno Tataviam Band of Mission Indians
Jairo Avila, Tribal Historic and Cultural Preservation Officer
1019 Second Street, Suite 1 — Tataviam
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
jairo.avila@tataviam-nsn.us

Fernandeno Tataviam Band of Mission Indians
Rudy Ortega, Tribal President
1019 Second Street, Suite 1 — Tataviam
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
rortega@tataviam-nsn.us

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393 — Gabrieleno
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693 — Gabrieleno
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

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

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490 — Gabrielino
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

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

San Fernando Band of Mission Indians
Donna Yocum, Chairperson
P.O. Box 221838 — Kitanemuk, Serrano, Tataviam
Newhall, CA, 91322
Phone: (503) 539 - 0933
Fax: (503) 574-3308
ddyocum@comcast.net

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 Resources Code and Section 6097.98 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed 17346 Sunset Project, Los Angeles County.

City of Los Angeles
Department of City Planning

Affidavit of Mailing

Case Number: ENV-2018-505-EAF

This Affidavit concerns the NAHC Tribal Consultation Letter.

I, MARISA GARCIA, certify that I am an employee of the City of Los Angeles, and on 02/21/2018, mailed, postage prepaid, to the applicable 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:

- ☒ Fernandeño Tataviam Band of Mission Indians
- ☒ Gabrieleño Band of Mission Indians – Kizh Nation
- ☒ Gabrielino Tongva Indians of California Tribal Council
- ☒ Gabrielino/Tongva Nation (Sam Dunlap)
- ☒ Gabrielino/Tongva Nation (Sandonne Goad)
- ☒ Gabrielino/Tongva San Gabriel Band of Mission Indians
- ☒ Gabrielino-Tongva Tribe
- ☒ San Fernando Band of Mission Indians
- ☒ Soboba Band of Luiseño Indians
- ☒ Torres Martinez Desert Cahuilla Indians

Staff Signature

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
VAHID KHORSAND
JOHN W. MACK
SAMANTHA MILLMAN
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

February 21, 2018

CASE No.: ENV-2018-505-EAF
Project Address: 17346 W. Sunset Blvd.
Community Plan: Brentwood-Pacific Palisades

Dear Tribal Representative:

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

CONSTRUCTION OF A (N) FIVE-STORY, MIXED-USE BUILDING WITH 4 DWELLING UNITS, AND 3,000 SQ. FT. OF RETAIL.

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: Kenton Trinh
200 N. Spring Street, Room 720
Los Angeles, CA 90012
Email: Kenton.trinh@lacity.org
Phone No.: (213) 978-1290

Sincerely,

TYNA HALL BRADLEY
Senior Administrative Clerk

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ
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RENEE DAKE WILSON
KAREN MACK
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
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CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
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EXECUTIVE OFFICER
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LISA M. WEBBER, AICP
DEPUTY DIRECTOR
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http://planning.lacity.org

January 4, 2019

Andrew Salas
Chairman
Gabrieleño Band of Mission Indians – Kizh Nation
910 N. Citrus Avenue
Covina, CA 91722

RE: AB 52 Completion of Consultation
17346 West Sunset Boulevard
(Case No. ENV-2018-505-MND)("Proposed Project")

Dear Mr. Salas:

The City, after acting in good faith and after reasonable effort, has concluded that mutual agreement cannot be reached for purposes of AB 52. Based upon the record, the City has determined that substantial evidence exists to support a conclusion that the Proposed Project may cause a significant impact on tribal cultural resources, but that the attached Mitigation Measure is adequate to mitigate any potential significant impacts. As additional protection, the City will add the attached Conditions of Approval under its police powers to protect the inadvertent discovery of tribal cultural resources, human remains, archaeological resources, and paleontological resources.

The City is expecting to release its Draft Mitigated Negative Declaration for public review in the next couple of months. Please do not hesitate to contact me if you wish to share any additional information, comments, or concerns.

Respectfully,

Kenton Trinh
City Planning Associate
West/South/Coastal Project Planning Division
Department of City Planning
200 N. Spring Street, Room 720
Los Angeles, CA 90012

Phone: (213) 978-1290
E-mail: kenton.trinh@lacity.org

Attachments:

1. Mitigation Measure
2. Conditions of Approval

Attachment No. 1

Mitigation Measure for Tribal Cultural Resources

Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrieleño Band of Mission Indians – Kizh Nation. Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface 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 within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, 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 Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal

monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Attachment No. 2

Condition of Approval for an Inadvertent Discovery of Tribal Cultural Resources

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

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.

- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Condition of Approval for an Inadvertent Discovery of Human Remains

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

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Condition of Approval for an Inadvertent Discovery of Archaeological Resources

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

Condition of Approval for an Inadvertent Discovery of Paleontological Resources

Paleontological Resources Inadvertent Discovery. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

APPENDIX F.
CONFIDENTIAL NATIVE AMERICAN COORDINATION DOCUMENTS

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