

APPENDIX B:

CULTURAL RESOURCES

B.2: Dudek,
Archaeological and Paleontological Resources Assessment
for the Enlightenment Plaza/Juanita Avenue Project,
Los Angeles, Los Angeles County, California,
April 22, 2020.

April 22, 2020

11822

Flexible PSH Solutions, Inc.
2102 Century Park Lane, Suite 413
Los Angeles, California 90067
Contact: John Molloy

Subject: Archaeological and Paleontological Resources Assessment for The Enlightenment Plaza/Juanita Avenue Project, Los Angeles, Los Angeles County, California

Mr. Molloy:

This letter documents the archaeological and paleontological resources assessment conducted by Dudek for The Enlightenment Plaza/Juanita Avenue Project (proposed Project), located in the City of Los Angeles (City), California. The proposed Project proponent is Flexible PSH Solution, Inc. The City is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA).

All cultural resources fieldwork and reporting for this proposed Project has been conducted by staff meeting the Secretary of the Interior's Professional Qualifications Standards. Archaeological findings and recommendations were drafted by Erica Nicolay, MA. Dudek archaeologist, Linda Kry, BA, contributed to the present report and provided management oversight. Report finalization and review for regulatory compliance was completed by Adam Giacinto, MA, RPA. Paleontological findings and recommendations were prepared by Michael Williams, PhD and Sarah Siren, MS. The present study documents the results of a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC), a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, a paleontological records search completed by Natural History Museum of Los Angeles County (LACM) staff, as well as geological and paleontological sensitivity desktop research.

PROJECT LOCATION AND PRESENT USE

The proposed Project site is located in the Wilshire Community Plan Area and in the northwest corner of the Rampart Village neighborhood of the City of Los Angeles, approximately 12.4 miles northeast of the Pacific Ocean (Figure 1). The proposed Project site, located at 312-328 North Juanita Avenue, 317-345 North Madison Avenue, and 3810-3838 West Oakwood Avenue includes approximately 7,499.9 square feet of lot area (1.93 acres). The proposed Project site is bound by Oakwood Avenue to the north, Beverly Boulevard to the south, North Madison Avenue to the east, and North Juanita Avenue to the west. For the purposes of this report, the entire block where the proposed Project site is situated is considered the Study Area. The Study Area falls on public land survey system (PLSS) Section 18 of Township 1 South, Range 13 West, within the *Hollywood*, CA 7.5-minute USGS Quadrangle.

The Study Area is located within a fully urbanized area devoted mainly to residential and commercial developments immediately south of the Hollywood Freeway (US-101). Surrounding uses in the immediate vicinity of the proposed Project site include commercial uses to the east, west, and south and residential uses to the north. The Study Area encompasses eight parcels and include Assessor’s Parcel Numbers (APNs) 5501-001-016, -019, -023, -025, -026, -027, -028, and -800 (Figure 2). Of these eight parcels, three parcels are within the proposed Project site (APNs 5501-001-023, -025, and -800). The Study Area is currently developed with a total of 11 buildings while the undeveloped portions are covered with an asphalt parking lot. Of these 11 extant buildings, seven are within the proposed Project site. Table 1, below, provides a summary of all 11 extant buildings within the Study Area and identifies which of those properties are within the proposed Project site.

Table 1. Extant Buildings Within the Study Area

APN	Street Address	Current Uses	Number of Buildings Present	Within Proposed Project Site?
5501-001-016	311 North Madison Ave	Commercial: Dewey Pest Control	None	No
5501-001-019	3725 Beverly Boulevard	Commercial: Midway Car Rental Hollywood	1 Building	No
5501-001-023	3812 Oakwood Avenue	Residential	3 Buildings	Yes
5501-001-025	3820 Oakwood Avenue	Commercial: Mackintosh & Mackintosh Structural Engineer	1 Building	Yes

Table 1. Extant Buildings Within the Study Area

APN	Street Address	Current Uses	Number of Buildings Present	Within Proposed Project Site?
5501-001-026	340 North Juanita Avenue	Commercial: MZ Collision Center	1 Building	No
5501-001-027	307 Madison Avenue	Commercial: Dewey Pest Control	1 Quonset Hut Structure	No
5501-001-027	3701 Beverly Boulevard	Commercial: Dewey Pest Control	1 Building	No
5501-001-800	316 North Juanita Avenue	Commercial: AT&T Yard	3 Buildings	Yes

PROJECT DESCRIPTION

The Project proposes to redevelop an approximate 94,623 square foot (2.17 acre) area located at 312 - 328 N. Juanita Avenue, 317 - 345 N. Madison Avenue, and 3810 - 3838 W. Oakwood Avenue in the Wilshire Community Plan of the City of Los Angeles (the “Project Site”). The Project Site is located in the M1-1 zone with a Limited Industrial General Plan land use designation. The Project Site is also located within Subarea D of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (the “SNAP”), a Specific Plan established by Ordinance No. 173,749 in 2001. The Project Site is currently improved with light industrial/commercial buildings, residential dwelling units and accessory surface parking.

The Project proposes to demolish the existing buildings and construct a new Permanent Supportive Housing development consisting of approximately 454 dwelling units and approximately 11,772 square feet of supportive services (the “Project” and “Enlightenment Plaza”). Exclusive of the five managers’ units, the Project would be 100% Restricted Affordable housing serving Extremely Low to Low Income individuals, and available only to target population members.

REGULATORY CONTEXT

This section includes a discussion of the applicable state laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during construction of the proposed project.

State

The California Register of Historical Resources (CRHR)

In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the CRHR “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 Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

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

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and

properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on nonunique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a nonunique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 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. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- 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.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

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 TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural

resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

Paleontological Resources

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state (CEQA) laws and regulations. This study satisfies project requirements in accordance with CEQA (13 PRC, 2100 et seq.) and Public Resources Code Section 5097.5 (Stats 1965, c 1136, p. 2792). This analysis also complies with guidelines and significance criteria specified by the Society of Vertebrate Paleontology ([SVP] 2010).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the “Environmental Checklist Form,” which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or ... unique geological feature[s].” This provision covers fossils of signal importance – remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that generally, a resource shall be considered “historically significant” if it has yielded or may be likely to yield information important in

prehistory (PRC 15064.5 [a][3][D]). Paleontological resources would fall within this category. The PRC, Chapter 1.7, sections 5097.5 and 30244 also regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

Local Regulations

Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monument (HCMs) and are under the aegis of the Planning Department, Office of Historic Resources. They are defined in the Cultural Heritage Ordinance as follows (Los Angeles Municipal Code Section 22.171.7, added by Ordinance No. 178,402, effective April 2, 2007):

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

This definition has been broken down into four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria – the HCM:

1. Is identified with important events in the main currents of national, State or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or
2. Is associated with the lives of Historic Personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values; or
4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

City of Los Angeles General Plan

The Conservation Element of the City of Los Angeles General Plan specifically addresses potential impacts to archaeological, paleontological, cultural, and historical resources (City of Los Angeles 2001). The General Plan addresses the City's rich archaeological and paleontological history; discusses regulations for site protection; and provides the following objectives, policies, programs:

“Objective: protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.

Policy: continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

Program: permit processing, monitoring, enforcement and periodic revision of regulations and procedures.

Responsibility: departments of *Building and Safety, *City Planning and Cultural Affairs and/or the *lead agency responsible for project implementation.”

BACKGROUND RESEARCH

SCCIC Records Search

On April 8, 2019, Dudek completed a CHRIS records search conducted at the SCCIC, located on the campus of California State University, Fullerton of the Study Area and a 0.5-mile (804 foot) record search area. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Study Area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The results of the records search are presented in Confidential Appendix A.

Previously Conducted Cultural Resource Studies

The SCCIC records indicate that 22 cultural resources investigations have been conducted within a half (0.5)-mile of the Study Area (Table 2). Of these, two studies have been conducted within a portion of the Study Area, including LA-05349 and LA-07061. Both of these reports are cultural resource studies prepared by LSA Associates, Inc. in support of a proposed wireless

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service facilities to be developed by AT&T Fixed Wireless Services. Neither study identified archaeological resources within a 0.5-mile of the Study Area and neither project required ground disturbance. Therefore, it was determined that there would be no potential to impact any unrecorded archaeological resources (Duke 2001a, Duke 2001b).

Table 2. Previous Cultural Resources Investigations Within 0.5-Mile of the Proposed Study Area

SCCIC Report Number (LA-)	Title	Author	Year	Proximity to Study Area
05344	Cultural Resource Assessment Cingular Wireless Facility No. Sm 057-01 Los Angeles County, California	Duke, Curt	2001	Outside
05349	Cultural Resources Assessment for AT&T Fixed Wireless Services Facility Number LA_057_a, County of Los Angeles, California	Duke, Curt	2001	Within
05358	Negative Archaeological Survey Report:07-la-ha12-n/a-07-174-21980k	Sylvia, Barbara	2001	Outside
07061	Cultural Resource Assessment for AT&T Fixed Wireless Services Facility Number La_057_a, County of Los Angeles, California	Duke, Curt	2001	Within
07381	Phase 1 Archaeological Investigation of 0.34 Acre Gateways SRO Housing Project 444-450 North Hoover Street Los Angeles City & County, California	Maki, Mary K.	2004	Outside
07388	Cultural Resources Survey for the Los Angeles Department of Water and Power First Street Trunk Line Project, Los Angeles, California	Snyder, T. Beth	2005	Outside
07430	Caltrans Historic Bridges Inventory Update: Concrete Box Girder Bridges	Feldman, J., Hope, A.	2004	Outside
07562	Additional Information for Dseis, Core Study Alignments 1, 2, 3, 4, and 5	Greenwood, Roberta S.	1987	Outside
07565	Technical Report Archaeology Los Angeles Rail Rapid Transit Project "Metro Rail" Core Study, Candidate Alignments 1 to 5	Unknown	1987	Outside
07566	Technical Report Dseis, Core Study Alignments 1, 2, 3, 4, and 5	Hatheway, Roger G. and Peter, Kevin J.	1987	Outside
07771	A Phase 1 Archaeological Study for the Proposed Regency at Robinson Affordable Housing Development Project Located at 3201-3221 W. Temple Street City of Los Angeles, County of Los Angeles, California	Wlodarski, Robert J.	2006	Outside
07399	Cultural Resources Records Search Results and Site Visit for Cingular Wireless Site EL-089-02 (Longview), 318 North Mariposa Avenue, Los Angeles, Los Angeles County, California	Michael Brandman Associates	2005	Outside

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Table 2. Previous Cultural Resources Investigations Within 0.5-Mile of the Proposed Study Area

SCCIC Report Number (LA-)	Title	Author	Year	Proximity to Study Area
07997	Fcc Form 621 (section 106) Submittal Beverly Blvd/rs-la-0220b, Los Angeles City and County, California	Billat, Lorna	2006	Outside
08003	Historic American Building Survey Report Conducted in Conjunction With the Kehe/kfi Radio Broadcast Studio Building Hans/haer Program, 141 North Vermont Avenue, City of Los Angeles, California	Van Horn, David M., White, Laurie S., and White, Robert S.	2002	Outside
8020	Technical Report: Cultural Resources Los Angeles Rail Rapid Transit Project "Metro Rail" Core Study; Draft Supplemental Environmental Impact Statement, Draft Subsequent Environmental Impact Report	Southern California Rapid Transit District	1987	Outside
08251	Los Angeles Metro Red Line Project, Segments 2 and 3 Archaeological Resources Impact Mitigation Program Final Report of Findings	Gust, Sherri and Heather Puckett	2004	Outside
10149	Finding of no adverse effect: US 101 from Alameda Street Underpass to Barham Boulevard Overcrossing	Stewart, Noah M.	2009	Outside
11572	Final Environmental Impact Report Belmont New Elementary School No. 6, State Clearinghouse No. 2001101116	Brandman, Jason	2002	Outside
11696	Cultural Resource Records Search and Site Survey AT&T Site LA0468-01, Good News Central Church, 3500 West First Street, Los Angeles, Los Angeles County, CA	Loftus, Shannon	2011	Outside
11943	Cultural Resource Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11566A (Beverly Storage) 3636 Beverly Boulevard, Los Angeles, Los Angeles County, California	Bonner, Wayne	2012	Outside
12176	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate Sv00198A (SM198 Beverly View Apartments) 302 North Alexandria Avenue, Los Angeles, Los Angeles County, California	Bonner, Wayne and Crawford, Kathleen	2012	Outside
13140	Cultural Resources Assessment of the Clinton SoCal Project, Los Angeles, Los Angeles County, California (BCR Consulting Project No. TRF1412)	Brunzell, David	2014	Outside

Previously Recorded Cultural Resources

SCCIC records indicate that a total of 16 previously recorded cultural resources fall within the records search area, none of which are within the Study Area. All 16 resources are historic-era buildings or structures. Table 3, below, summarizes all 16 resources. No prehistoric or historic archaeological sites or resources have been previously recorded within a 0.5 mile of the Study Area.

Table 3. Previously Recorded Archaeological Resources Within 0.5 Mile of the Study Area

Primary Number (P-19-)	Age and Type	Description	NRHP Eligibility	Recorded By and Year	Proximity to Study Area
173422	Historic: Built Environment	Korea Times; OHP Property Number - 064891	Originally 2S2 (Individual Property determined eligible for NR by a consensus through Section 106 process. Listed in the CR) Has since been demolished	1986 (S. Bourstein, SCRTD)	Outside
173423	Historic: Built Environment	133 S Vermont Ave; OHP Property Number - 064892	6Y (not eligible for NRHP; not evaluated for CRHR or local)	1986 (S. Bourstein, SCRTD)	Outside
173424	Historic: Built Environment	U S Credit Bureau; OHP Property Number - 064893	6Y (not eligible for NRHP; not evaluated for CRHR or local)	1986 (S. Bourstein, SCRTD)	Outside
173431	Historic: Built Environment	Décor Interiors; OHP Property Number - 064900	6Y (not eligible for NRHP; not evaluated for CRHR or local)	1986 (S. Bourstein, SCRTD)	Outside
176445	Historic: Built Environment	Virgil Junior High School	7J (Received by OHP for Evaluation or action but not yet evaluated)	1986 (S. Bourstein, SCRTD)	Outside
187559	Historic: Built Environment	Clinton St under US 101 Bridge	5 (Not eligible for the NR)	2003 (C. Chasteen, D. Greenwood, Myra L Franck)	Outside
187869	Historic: Built Environment	American Storage Co	2S2 (Individual property determined eligible for the NR by consensus through Section 106 process. Listed in CR)	2006 (B. Taniguchi and R. Smith, Galvin Preservation Associates)	Outside
189930	Historic: Built Environment	Korean Community Cultural Center	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside

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Table 3. Previously Recorded Archaeological Resources Within 0.5 Mile of the Study Area

Primary Number (P-19-)	Age and Type	Description	NRHP Eligibility	Recorded By and Year	Proximity to Study Area
189931	Historic: Built Environment	Korean Community Cultural Center	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189932	Historic: Built Environment	100 N. New Hampshire Ave	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189933	Historic: Built Environment	106 N. New Hampshire Ave	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189934	Historic: Built Environment	112 N. New Hampshire Ave	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189935	Historic: Built Environment	118 N. New Hampshire Ave	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189936	Historic: Built Environment	122-132 N. New Hampshire Ave	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189937	Historic: Built Environment	Gallery Furniture	Found ineligible during a survey evaluation; Never formally evaluated and has since been demolished	2002 (David M. Van Horn, MBA)	Outside
189985	Historic: Built Environment	Good News Central Church	3S (Appears eligible for CR as an individual property through survey evaluation)	2011 (Shannon L. Loftus, ACE Environmental)	Outside

Geological Setting and Map Review

The proposed Project is located within the northernmost Peninsular Ranges geomorphic province (Norris and Webb 1990; California Geological Survey [CGS] 2002; Harden 2004). This geomorphic province is characterized by northwest trending mountain ranges and valleys that extend over 900 miles from the tip of the Baja Peninsula to the Transverse Ranges (i.e. the San Bernardino and San Gabriel Mountains in southern California). Regionally, the Peninsular Ranges are bounded to the east by the Colorado Desert and the west by the continental shelf and offshore islands (Santa Catalina, Santa Barbara, San Nicholas, and San Clemente) (Norris and Webb 1990; CGS 2002; Harden 2004). Regional mountain ranges in the Peninsular Ranges geomorphic province include the Santa Ana, San Jacinto, and Santa Rosa Mountains. Geologically, these mountains are dominated by Mesozoic, plutonic igneous and metamorphic rocks that are part of the Peninsular Ranges batholith (Southern California batholith) (Jahns 1954; Harden 2004).

More specifically, the proposed Project site is located within the central structural block of the Los Angeles Basin (Yerkes et al. 1965). The Los Angeles Basin (also called the coastal plain) extends from the Santa Monica Mountains in the north to the San Joaquin Hills of Orange County in the south and is a structural basin that in some areas has been subsiding and filling with sediments since the late Cretaceous (Yerkes et al. 1965). The Los Angeles Basin is characterized by alluvial coastal plains, underlain by older alluvial and marine sediments, and punctuated by uplifted highlands owing to the numerous faults underlying the Basin. These faults, which include the Newport-Inglewood fault zone in the south and the Sierra Madre fault zone in the north, are part of the greater San Andreas fault system, characterized by numerous strike-slip faults.

According to surficial geological mapping by Dibblee and Ehrenspeck (1991) at a scale of 1:24,000, the majority of the proposed Project parcel contains surface deposits of Holocene (< 11,700 years ago) younger Quaternary alluvium (map unit Qa). Late Miocene (~11.63 million years ago [mya] – 5.33 mya) unnamed shale (Puente Formation or upper Modelo Formation of some authors) is mapped in the northeast corner and along the western boundary of the western proposed Project site (Dibblee and Ehrenspeck 1991).

LACM Paleontological Records Search

Dudek requested a paleontological records search through the LACM on April 04, 2019 and the results were received on April 18, 2019. The results of this search are provided within Confidential Appendix C. The records search indicated that the museum does not have any vertebrate fossil localities recorded within the proposed Project site boundaries; however, they do have localities within the one-half mile buffer and outside the buffer but nearby from the same sedimentary deposits that occur subsurface. Below the surficial Quaternary alluvium, which is generally too

young to preserve fossils, there are likely Pleistocene or Ice Age (~2.58 mya – 11,700 years ago) older Quaternary deposits and/or late Miocene shale deposits that have the potential to produce significant fossils. The closest vertebrate fossil locality from older Quaternary deposits, LACM 3250, produced a fossil mammoth (*Mammuthus*) less than one-half kilometer north of the proposed Project near the intersection Madison Avenue and Middlebury Street from approximately eight feet below the street surface (McLeod 2019 – Appendix C). The LACM reported a fossil mastodon (Mammutidae) from approximately five to six feet below the ground surface (bgs) near the intersection of Western Avenue and Council Street, just south of west of the proposed Project site.

The following localities from the Miocene shale deposits were recovered during construction of the MTA Metrorail Red Line Project that included abundant and diverse fossil fishes (McLeod 2019 – Appendix C). The closest vertebrate fossil, LACM 6946, is situated immediately south of west of the proposed Project, within the one-half mile radius buffer along Vermont Avenue from approximately Beverly Boulevard to Hollywood Boulevard (McLeod 2019 – Appendix C). The next closest localities, situated further to the northwest to north-northwest of the proposed Project, are LACM 6947 and LACM 6948 that produced fossil fish remains from near Vermont Avenue and Santa Monica Boulevard and Vermont Avenue and Sunset Boulevard Stations (McLeod 2019 – Appendix C). The fish remains included a new species of croaker (*Genyonemus whistleri*), which was describe by Takeuchi and Huddleston (2008). Vertebrate fossil localities LACM 6198-6201, which were recovered near MacArthur Park south the of proposed Project, yielded fossil needlefishes (Belonidae), moras (Moridae), lanternfishes (Myctophidae), mackerels (Scombridae), slickheads (Alepocephalidae), deep sea smelts (*Bathylagus*), and bristlemouth (*Cyclothone*) (McLeod 2019 – Appendix C). Southwest of the proposed Project site, near the intersection of Vermont Avenue and Wilshire Boulevard, the LACM reported two fossil localities collected between 60 and 80 feet bgs that produced dozens of fish taxa during excavations for the Metrorail Wilshire/Vermont station (see McLeod 2019 – Appendix C for a complete list of specimens).

The LACM recommended paleontological monitoring below the upper few feet of alluvium and collection of sediment samples to determine the microvertebrate fossil productivity.

Native American Correspondence

NAHC Sacred Lands File Search

Dudek contacted the NAHC on April 4, 2019 and requested a review of the SLF. The NAHC replied via email on April 25, 2019 stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may

have direct knowledge of cultural resources in or near the proposed Project site. No additional tribal outreach was conducted by Dudek. The Project is not subject to compliance with AB 52..

Review of Historic Aerials and Topographic Maps

Dudek consulted historic maps and aerial photographs to understand development of the Study Area and surrounding properties. Topographic maps are available for the years 1894, 1896, 1898, 1900, 1902, 1904, 1906, 1908, 1910, 1913, 1915, 1921, 1928, 1931, 1932, 1955, 1963, 1968, 1975, 1982, 1995 and 2012 (NETR 2019a). Historic Aerial maps are available for the years 1927, 1941, 1948, 1952, 1954, 1956, 1960, 1962, 1964, 1965, 1968, 1971, 1972, 1976, 1979, 1980, 1983, 1989, 1994, 2003, 2004, 2005, 2009, 2010, 2012, and 2014 (Aerial Map Industries 1983; Fairchild Aerial Survey 1927, 1927, 1941, 1952, 1956, 1960, 1962, 1965, 1968; Teledyne Geotronics 1971, 1976, 1979; U.S. Geological Survey 1994; NETR 2019b).

The first USGS topographic map showing the Study Area dates to 1894 and shows that there was at least one structure within the Study Area and a few other structures in the general vicinity. Additionally, the topographic map from 1894 shows a railroad line running in an east-west alignment south of the Study Area and several streets in the general vicinity. Topographic maps show no changes to the Study Area or the general vicinity until 1921. The 1921 map shows a dramatic increase in development within the Study Area and the general vicinity. In 1921, the Study Area was extensively developed and the extant streets had been laid out. Between 1921 and 1928 there was a general increase in development throughout the area. There are no discernible changes to the Study Area visible on the 1928 map. The next visible changes to the Study Area and vicinity can be seen on the 1955 map which shows that the entire area had been completely built out and that the US-101 freeway had been developed immediately to the north of the Study Area. Topographic maps from later decades do not show extensive changes within the Study Area aside from a general increase in density in the city overall.

The historic aerial from 1927 shows the Study Area as completely developed with many small residential structures. The quality of the aerial makes it difficult to determine the exact number of structures within the Study Area. The next aerial, dating to 1941, shows that the Study Area has been developed with approximately 15 residential structures, some of which have associated ancillary buildings. The three extant residential structures developed within APN 5501-0001-023 are visible on this aerial. In addition to the homes, there is one rectangular building present on the southeast corner of the Study Area, in APN 5501-001-028, depicted on the 1941 aerial. This building appears to be part of the extant building, which was later expanded to include an addition along the western wall. The 1941 aerial indicates that there is some type of commercial development in the southeast corner, consisting of a large parking lot, a small hexagon-shaped structure, and a small building. There are two large areas of undeveloped land in the central

portion and in the southeast quadrant of the Study Area, both of these undeveloped sections of the Study Area are within the proposed Project site. The aerial from 1948 shows the Study Area in much the same state as in 1941. To the northeast of the Study Area the initial demolitions associated with the development of the US-101 Freeway are visible on the 1948 aerial. The aerial from 1952 shows the US-101 Freeway in its current state. By 1952, the Quonset Hut, in APN 5501-001-027, is visible. There is still one large vacant area in the center of the Study Area, within a portion of the proposed Project site. There are no discernible changes to the Study Area or general vicinity visible on the 1954 or 1956 aerial.

The most extensive changes to the Study Area occurred between 1956 and 1960; these changes consisted of the demolition of all of the structures within the site except for the extant structures in the southeast corner and several residential structures in the northwest corner. One of these extant structures, the rectangular building in APN 5501-001-028, was expanded to its current extant during this time. The majority of the site was paved, the rectangular building within the center of APN 5501-001-800 was built, and three rectangular structures within APN 5501-001-019, one of which is the extant structure, were built. Additionally, there were two structures directly north of the Quonset Hut visible on the 1960 aerial. Between 1962 and 1965, all but the three existing houses in the northwest corner were demolished and the existing structures were built. There are no visible changes on the aerials between 1965 or 1972 aerial. Between 1972 and 1976 the small rectangle building in the center of the Study Area, in APN 5501-001-800, was built. Between 1980 and 1989 the small shed like structure in the northeastern most corner of the Study Area within APN 5501-001-800 was built. There are no discernible changes on the aerials until 2003, when it appears that four structures, two in the southwest corner of the Study Area and two in the southeast, had been demolished. The remaining aerials do not show any significant changes to the Study Area.

The review of historic aerials and topographic maps indicates that of the seven structures existing within the proposed Project site, the three extant residential structures at 3812 Oakwood Avenue in APN 5501-001-023, were constructed by at least 1941. At 316 North Juanita Avenue, within APN 5501-001-800 there are currently three structures. The rectangle structure along the western boundary, associated with was built between 1956 and 1960. The smaller rectangle structure in the center of APN 5501-001-800, directly east of the building developed between 1956 and 1960, was built after 1972. Prior to this time the center of APN 5501-001-800 was paved or undeveloped. The small shed-like structure in the northeastern most corner of APN 5501-001-800 was built between 1980 and 1989. The seventh building within the proposed Project site, located at 3820 Oakwood Avenue, within APN 5501-001-025 was built between 1962 and 1965.

Within the Study Area, the large structure currently associated with the MZ Collision Center, within APN 5501-001-026 was built between 1965 and 1972. The rectangular structure currently

associated with Dewey Pest Control within APN 5501-001-027 was initially developed between 1927 and 1941 and was later renovated between 1956 and 1960. The Quonset Hut currently associated with Dewey Pest Control, within APN 5501-001-028, was built between 1948 and 1952. Finally, the building currently associated with Midway Car Rental Hollywood, within APN 5501-001-019, was built between 1956 and 1960.

Geomorphology

Potential for yet identified cultural resources in the vicinity was reviewed against soil, geologic, and topographic GIS data for the area and information from other near-by projects. The “archaeological sensitivity,” or potential to support the presence of a buried prehistoric archaeological deposits, is generally interpreted based on geologic landform, environmental parameters (i.e., distance to water and landform slope), and an area’s history of use.

Soils within the proposed Project site are classified as urban land-Ballona-Typic Xerorthents, fine substratum complex and urban land-Montebello complex in the east (map unit symbols 1137 and 1238, respectively) and urban land-Dapplegray complex in the west and northeast (map unit symbol 1240) (USDA 2019). While the Urban land-Ballona Typic Xerorthents and urban land-Montebello complex soils are characterized by 0 to 5 percent slope angles, the urban land-Dapplegray complex soils are characterized by 5 to 20 percent slope angles (USDA 2019). These soils are likely derived from an assortment igneous, metamorphic, and metasedimentary parent materials weathered and eroded from the foothills and San Gabriel Mountains to the north. With the exception of the westernmost and northeastern portions of the proposed Project site where Miocene marine rocks are mapped, sediment formation in this location would likely have occurred primarily since the Holocene given the young age of the deposits on the surface.

The close proximity of elevated areas on the western edge and northeastern proposed Project site, make the proposed Project site vicinity potentially important to prehistoric inhabitants. Currently, the proposed Project site contains commercial and residential buildings and parking lots. Based on the disturbed context and lack of a subsurface component to the proposed Project, the area is considered to have a low to moderate potential to contain unknown intact cultural and a moderate to high potential to contain paleontological deposits.

SENSITIVITY ANALYSIS

Archaeological Sensitivity

No archaeological resources were identified within the proposed Project site or the Study Area through the SCCIC records or NAHC SLF search. Additionally, no archaeological resources have been identified within a 0.5-mile of the Study Area. Historic topographic maps indicate that the

Study Area was initially developed in the early 20th century and was redeveloped between the 1950s and the 1960s. Historic era features, such as trash deposits, or structural remnants from the earlier buildings, may still be present within the proposed Project site; however, through a review of historic aerials, it appears that a large portion in the center of the proposed Project site remained undeveloped through much of the twentieth century, before being paved in the late 1950s. The development and redevelopment of the Study Area have likely impacted any surficial deposits that may have contained prehistoric archaeological deposits. However, there have been no subterranean structures, such as a basement or below ground parking lot, within the proposed Project site. As such, there is a slim possibility that intact cultural deposits could persist in some areas below the surface. The proposed Project site is predominately covered with an asphalt parking lot, suggesting ground disturbance may have been less severe than other areas with developed structures. The absence of previously identified archaeological resources within the proposed Project site or a 0.5-mile radius suggests the area does not have an elevated sensitivity for archaeological resources relative to the surrounding region. Considering these factors, the potential for buried prehistoric-era and historic-era archaeological deposits to exist within the proposed Project site is considered to be relatively low.

Paleontological sensitivity

No paleontological resources were identified within the proposed Project site during the paleontological records search through the LACM or desktop research conducted by Dudek. However, several fossil localities were reported by the LACM within the one-half mile radius buffer. The proposed Project site is immediately underlain by recent Quaternary alluvium that is generally too young to contain significant paleontological resources. However, at depths greater than five feet below the original surface, there is a greater likelihood of encountering sediments that are old enough to contain significant paleontological resources, such as Pleistocene alluvium and/or Miocene marine rocks. For instance, during the construction of an apartment complex on Virgil Avenue near 6th Street, less than 1-mile south of the proposed Project site, dozens of fossil fish specimens were recovered from the Unnamed Miocene shale deposits mapped on the surface and adjacent to the proposed Project (Williams, pers. obs. 2015). The fossil fish fauna was recovered below the depth of alluvium where present and on the surface where the unnamed shale was present on the surface. This locality was recovered within the 1-mile buffer of the project alignment, just to the south-southwest of the southern terminus of the trunk line alignment.

The buildings that currently occupy the proposed Project site will be demolished, but are likely underlain by fill and/or disturbed sediments. The LACM recommended monitoring below the upper few feet within the proposed Project site. Considering these factors, the likelihood for paleontological resources to be impacted within the proposed Project site is considered low above a depth of five feet below the original ground surface in areas underlain by Holocene alluvium,

increasing to moderate or high below five feet and high in areas of the proposed Project underlain by Miocene marine rocks.

SUMMARY AND MANAGEMENT CONSIDERATIONS

Dudek initially completed cultural resources technical work for this project in August of 2019. In April of 2020, Dudek revisited the cultural resources studies for this project to ensure report findings were consistent with the updated project plans and description. All data and findings presented in this study reflect April 2020 project data.

No archaeological or paleontological resources were identified within the proposed Project site or immediate vicinity as a result of the CHRIS records search, LACM paleontological records search, or NAHC SLF records search. Moreover, based on geomorphological evidence, the area has a relatively low potential to contain unanticipated cultural or paleontological resources. However, it is always possible that intact archaeological deposits or paleontological resources are present at subsurface levels. As such, no additional archaeological or paleontological efforts are recommended to be required beyond standard considerations for the management of unanticipated resources. Management recommendations to reduce potential impacts to unanticipated archaeological and paleontological resources and human remains during construction activities are provided below. With the implementation of these measures, impacts to archaeological and paleontological resource as a result of the proposed Project will be less than significant.

Unanticipated Archaeological Resources

All construction crews should be alerted to the potential to encounter archaeological resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities involving ground disturbance for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. This avoidance buffer may be adjusted following inspection of this area by that qualified specialist. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find under CEQA (14

CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. Feasible options for avoidance must also be considered. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Paleontological Resources Recommendations

In accordance with the paleontological records search results and recommendations and background geological and paleontological literature and map review, the following mitigation is recommended to reduce potential impacts to significant paleontological resources. Incorporation of this mitigation would reduce impacts to below a level of significance per the CEQA guidelines.

Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP (2010) guidelines and should outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the project area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a paleontological monitor shall be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed, fine-grained Holocene alluvial deposits below a depth of 5 feet bgs and all excavations in areas mapped as Miocene marine deposits. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find.

Unanticipated Human Remains

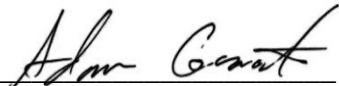
In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code,

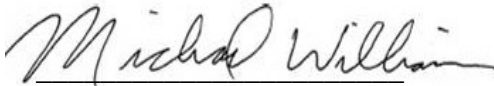
Subject: Archaeological and Paleontological Resources Assessment for The Enlightenment Plaza/Juanita Avenue Project, City of Los Angeles, Los Angeles County, California

Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Should you have any questions relating to this report and its findings please do not hesitate to contact me directly at agiacinto@dudek.com or Michael J. Williams by email at mwilliams@dudek.com or phone at (225) 892-7622.

Sincerely,


Adam Giacinto, M.A., RPA
Archaeologist


Michael Williams, Ph.D.
Paleontologist

cc: Linda Kry, Erica Nicolay, Sarah Siren, Micah Hale, Dudek

Att: *Figure 1. Project Location Map*
Figure 2. Project Site Map
Appendix A (Confidential): SCCIC Records Search Information
Appendix B: NAHC Search Results
Appendix C (Confidential): LACM Paleontological Records Search Results

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APPENDIX A (CONFIDENTIAL)
SCCIC Records Search Results

APPENDIX B
NAHC Sacred Lands File Search

APPENDIX C (CONFIDENTIAL)

LACM Paleontological Records Search

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



April 25, 2019

Erica Nicolay
Dudek

VIA Email to: enicolay@dudek.com

RE: Juanita Avenue Project, Los Angeles County

Dear Ms. Nicolay:

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

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

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

Sincerely,

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

Steven Quinn
Associate Governmental Program Analyst

Attachment

