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## TECHNICAL MEMORANDUM

**To:** Stacie Henderson  
CAJA Environmental Services, LLC  
15350 Sherman Way  
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Van Nuys, CA 91406

**From:** Chris Millington, Principal Investigator

**Date:** March 22, 2021

**Re:** **Tribal Cultural Resources Review for the 1201 S. Grand Avenue Project,  
City of Los Angeles, California**

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### INTRODUCTION AND SUMMARY

Eco Tower, LLC (Project applicant) retained SWCA Environmental Consultants (SWCA) to prepare a tribal cultural resource review for the proposed 1201 S. Grand Avenue Project (Project), located in Los Angeles, California. The City of Los Angeles (the City) is the Lead Agency under California Environmental Quality Act (CEQA) for the Project. The proposed Project consists of the removal of an existing three-story office building (the “Existing Building”) and a surface parking lot for the construction of a new 40-story high-rise mixed-use building. The Project design calls for three subterranean parking levels requiring excavation approximately 40 feet below the existing grade. The proposed Project is in the downtown area of Los Angeles on the west side of the intersection of S. Grand Avenue and W. 12th Street (Figure A-1)<sup>1</sup>. The Project site is composed of two parcels: 1201 S. Grand Avenue (assessor parcel number [APN] 5139-022-008), which contains the existing building, and 1205–1215 S. Grand Avenue (APN 5139-022-009), which contains the surface parking lot (Figure A- 2). The Project site is in Section 32 of Township 1 South, Range 13 West, and is plotted on the U.S. Geological Survey (USGS) Hollywood, California, quadrangle (Figure A-3).

The following memo provides a review of available evidence for known tribal cultural resources within the Project site and analyzes the likelihood (i.e., sensitivity) for as-yet unknown tribal cultural resources that could be present in the Project site as buried archaeological deposits. The results of this review are intended to provide a means of assessing the potential for impacts to tribal cultural resources in accordance with the significance thresholds in Appendix G of CEQA Guidelines. SWCA reviewed the results of California Historical Resources Information System (CHRIS) and sacred lands file (SLF) searches, neither of which identified any known resources within the Project site. Public Resources Code (PRC) Section 21082.3.1, as amended by Assembly Bill 52 (AB 52), requires the lead agency to begin consultation with culturally and geographically affiliated California Native American tribes prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. Notifications were sent to tribes on the City’s AB 52 list on October 19, 2020. To date, no replies have been received.

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<sup>1</sup> All figures are presented in Attachment A.

Although not all tribal cultural resources are archaeological in nature, those preserved below the surface would likely fit the definition of a both an archaeological and tribal cultural resource. Similarly, the evaluation of a tribal cultural resource must consider the cultural values to a California Native American tribe, in addition to scientific and archaeological considerations. Accordingly, SWCA's assessment focuses exclusively on the scientific and archaeological sources of evidence, consistent with standard industry practices, and the analysis of the sensitivity for buried tribal cultural resources considered only those that are archaeological in nature.

SWCA's review found that while there are known significant Native American village sites located in the general vicinity, such as Yaanga and Rancheria de los Pipimares, the Project site is not located near enough or in a comparable environmental setting to suggest an increased likelihood for associated tribal cultural resources within the Project site. The Project site is set within what has been a broad floodplain of the Los Angeles River for which there are only generalized indicators of former use by Native Americans such that substantial material deposits are likely to have occurred. These generalized indicators include a reasonable proximity to former stream courses and important natural resources that occur in higher densities near waterways. Late Pleistocene and early Holocene-aged alluvium below the artificial fill within the Project site appears to be relatively favorable for preservation of buried tribal cultural resources; however, the impacts to the near-surface from historic-period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on these findings, the sensitivity for tribal cultural resources is considered low.

Although no known tribal cultural resources have been identified in the Project site and the sensitivity is considered low, the location of a tribal cultural resource that is archaeological in nature is unpredictable and the potential for a resource to be present cannot be fully ruled out. The City will impose a condition of approval that addresses the inadvertent discovery of a tribal cultural resource, a copy of which is included here as Attachment B. The condition requires that in the event a potential tribal cultural resource is discovered in the Project site during ground-disturbing activities such as demolition, excavation, grading, or drilling, all ground-disturbing activities temporarily cease until it is determined whether the discovery is a tribal cultural resource and appropriate treatment is determined through consultation with a California Native American tribe on the City's AB 52 list and with a qualified archaeologist.

This report was prepared by SWCA Principal Investigator Chris Millington, M.A., Registered Professional Archaeologist. Mr. Millington meets the Secretary of the Interior Professional Qualification Standards in archaeology and the Society for California Archaeology's standards for a principal investigator. The CHRIS and SLF results letters are included in Attachments C and D, respectively. Copies of this report are on-file with the Applicant, the City's Department of City Planning, and the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. All background materials are on file with SWCA's office in Pasadena, California.

## **REGULATORY SETTING**

### **State Regulations**

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

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

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

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

## **AB 52 TRIBAL CONSULTATION**

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC), whether or not they are federally recognized. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency makes a decision to undertake a project, the lead agency has 14 days to formally notify Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project site and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contact 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 (PRC Section 21080.3.2[a]). The consultation shall be considered concluded when either the parties agree to measures mitigating or avoiding a significant effect, if one exists, on a tribal cultural resource; or a party, acting in good faith and after reasonable effort, concludes that agreement cannot be reached (PRC Section 21082.3.2[b]).

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or

the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

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

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

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

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

### **Local Regulations**

#### ***City of Los Angeles, Department of City Planning***

#### **CONDITION OF APPROVAL**

The City has developed a standard condition of approval to address the inadvertent discovery of tribal cultural resources during activities of a proposed project. The condition of approval is intended to ensure that if any such discoveries occur, they will be handled in compliance with state law so that any potential impacts would be less than significant. The condition of approval requires that in the event of discovery of a potential tribal cultural resource, all ground-disturbing activities—including but not limited to demolition, excavation, grading, or drilling—will temporarily cease. These activities cannot resume in the vicinity of the discovery until it is determined whether the discovery is a tribal cultural resource. If the discovery is confirmed as a tribal cultural resource, appropriate treatment will be determined if necessary. The identification and any treatments will be determined in consultation with a California Native American tribe on the City's AB 52 list and a qualified archaeologist. A copy of the City's standard condition is included as Attachment B.

## **ENVIRONMENTAL SETTING**

The Project site is located in the Los Angeles Basin, a broad, level plain bound by the Pacific Ocean to the west, the Santa Monica Mountains and Puente Hills to the north, and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments (Bedrossian et al. 2012; Dibblee 1991). It is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana rivers.

The south-flowing Los Angeles River is currently located approximately 3.2 km (2.0 miles) east of the Project site. Historically, the channel of the Los Angeles River has shifted courses several times during flood events (Figure A-4). Among the first recorded shifts is a shift that occurred in 1815 when floodwaters overflowed the former channel, shifting the course at least 0.8 km (0.5 mile) to the southwest, near the present route of Spring Street, and 1.05 km (0.65 miles) east of the Project site (Figure A-4). That flood is reported to have destroyed structures built as part of the original Los Angeles Pueblo (Gumprecht 2001:139–141) and may have also flooded all or parts of the Native American village site of Yaanga, which is believed to have been located nearby (see below, Native American Communities in Los Angeles). Some shifts were more dramatic, changing by 90 degrees and altering the course of the river to the ocean. Before 1825, the river flowed west from what is now downtown Los Angeles and discharged into the Ballona Wetlands in what is now Playa del Rey. The river followed a western course approximated by Washington Boulevard and then turned southwest at the Baldwin Hills, flowing along the northwest-facing side of the slopes—the course now occupied by Ballona Creek (Gumprecht 2001:17). Heavy rains in 1825 caused the channel to overflow its banks and the Los Angeles River shifted its course fully south, emptying into the bay near San Pedro, where the river has discharged ever since. In subsequent years, the river would frequently shift its course within the southern floodplain, which in some areas measures up to 2 miles wide (Gumprecht 2001:16). However, these more dramatic shifts between the western and southern routes are likely to have occurred during most of the life of the watercourse, and certainly over during the last 13,000 years—the period in which there is evidence of Native Americans in southern California.

Flood events such as those recorded in more recent history have produced massive deposits of alluvial sediments within the respective floodplains. Alluvial terraces formed where flooding water eroded into uplifted landforms. In the downtown Los Angeles area, the backslopes in the location of Bunker Hill delineate the edge of the historical floodplain. The Project site is situated within sediments characterized as young alluvial valley deposits, symbolized as Qya in surficial geology maps (Figure A-5; Bedrossian et al. 2012). The Project site is near the contact point between the Qya unit and one mapped as Qyf—designating young alluvial fan deposits. Both geologic units were formed in the Late Pleistocene to Holocene.<sup>2</sup> Bedrossian and others (2012) describe the alluvial valley deposits as slightly consolidated clays, silts, sands, and gravels deposited along stream valleys and alluvial flats of larger rivers; they describe the alluvial fan deposits as slightly consolidated boulders, cobbles, gravels, sands, and silts. These geologic units are essentially composed of thick accumulations of alluvium—sediments deposited by water—that accumulated over at least the last 20,000 years.

A geotechnical investigation of the Project site was conducted in 2018 by GeoPentech, Inc. Hadidi and others (2020) constructed sediment profiles from two auger bores that were used to characterize the subsurface setting within the Project site. The bores were drilled within the surface parking lot on the southwestern portions of the Project site. The uppermost stratum identified in the sediment profiles is described as artificial fill, which extends approximately 5 feet below the ground surface. The fill is composed of stiff to hard clayey silts with sand and gravel, intermixed with brick and concrete fragments.

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<sup>2</sup> The time range for the Pleistocene Epoch is 2.588 million to 12,000 years ago; the Holocene Epoch began 12,000 years ago with the end of the glaciation period known as the Ice Age.

They note that pockets of deeper fill or possible structural remains could be present in other portions of the Project site, but limited sampling prevents more detailed mapping. The artificial fill is underlain by native quaternary alluvium—sediments deposited by water—consisting of dense to very dense sands, silty to clayey sands, and silty sands with gravel, with a layer of very stiff to hard silty to sandy clay; the clay strata were encountered between 45 and 70 feet below the surface (Hadidi et al. 2020:5). Above the deeper clay deposits, the surficial alluvial strata are composed of silt sand deposits up to 15 feet thick with fine to coarse gravels. These deposits of alluvium are consistent with depositional trends for the Los Angeles Basin, which was subject to shifting courses of the Los Angeles River and episodic, high-energy flooding.

## **CULTURAL SETTING**

### **Prehistoric Period**

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 in the last three decades through radiocarbon dating by southern California researchers (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 subsequent studies, including Koerper and Drover (1983).

#### ***Horizon I—Early Man (ca. 10,000–6,000 BC)***

Any discussion of human occupation of coastal areas during the terminal Pleistocene and Early Holocene must be prefaced with an understanding that sea level rise during this period of shifting climate inundated many kilometers of shoreline worldwide. Therefore, any evidence of human occupation in a present-day coastal setting is likely only a small fraction of what originally existed. The earliest evidence for human occupation in California is found on the northern Channel Islands, off the coast of Santa Barbara, in the Southern California Bight. Multiple Terminal Pleistocene sites have now been dated on California's Northern Channel Islands, firmly establishing the presence of early coastal-adapted people in the region (Erlandson et al. 1996, 2011; Erlandson and Braje 2008). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002) and recent excavations and radiometric dating of multiple archaeological assemblages on Santa Rosa (Erlandson et al. 2011) and San Miguel islands document Paleoindian technologies, subsistence strategies, and seasonality of site occupation during the latter part of the terminal Pleistocene (approximately 11,700 cal. BP) with similarities to the Western Stemmed Tradition found across much of western North America.

Similarly, early sites were likely present on the mainland California coast; however, the rate and degree of development beginning with European colonization and continuing to the present has likely destroyed most early sites along the California mainland coast. Nevertheless, present-day Orange and San Diego Counties contain several sites dated to the Early Holocene—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); radiocarbon dates from the Goleta Slough area indicate occupations spanning ca. 9300–8400 cal. BP with a primary

subsistence focus on lagoon-bay shellfish (Owen et al. 1964). Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin apparently date to the Middle Holocene, if not earlier (Brooks et al. 1990; Erlandson et al. 2007:54). These sites include the discoveries known as “Los Angeles Man,” “La Brea Woman” from the La Brea Tar Pits, and the Haverty skeletons, all of which are located between 10.3 and 7.5 km (6.4 and 11 miles) west of the Project site (Figure A-6).

Recent data from Horizon I sites on the mainland 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. Fundamental elements of lithic tool technology described by Wallace (1955) for this period include numerous scrapers, choppers, chipped and notched crescents, and large blades and points. Wallace also describes deposits from Malaga Cove comprising clam shell beads and bone beads, along with an absence of seed grinding implements from the site type for this period.

### ***Horizon II—Milling Stone (6,000–3,000 BC)***

Horizon II (or the Milling Stone Horizon) corresponds to the Early Holocene when rising sea levels continued to encroach on coastlines, though global climate was slowly stabilizing. Set during a warmer and drier climatic regime than Horizon I, the Milling Stone Horizon is characterized by subsistence strategies centered on collecting plant foods and small animals; though in coastal areas where archaeological assemblages have been preserved there is also ample evidence of marine resource use during this time period as well (Connolly et al. 1995; Rick et al. 2001). The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos) (Erlandson 1991, 1994; Moriarty 1967; Warren 1967). The variety of site types from this period indicate a mobile settlement pattern and 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).

Milling stone assemblages are characterized by the extensive use of milling stones and mullers along with a general lack of finely crafted projectile points, though leaf-shaped points believed to be darts are present. The lack of bone and shell tools at some sites dated to this time period has led some researchers to suggest a stronger reliance of plant food resources. Several site types have been described for this Horizon throughout southern California, including Topanga Canyon, Little Sycamore in Ventura, the La Jolla shellmounds, Porter Ranch in San Fernando, Zuma Creek, and Encino Village.

### ***Horizon III—Intermediate (3,000 BC–AD 500)***

Horizon III corresponds with the Middle Holocene and early Late Holocene time periods geologically and marks the point when current shorelines were established in most parts of the world. Consequently, evidence for marine resource use appears to increase after 5,000–6,000 years ago. 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, including side-notched projectile points, 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-shelled seed resources to the increasing importance of fleshier fruits like the acorn (e.g., Glassow et al. 1988; True 1993).

Technological markers described by Wallace (1955) for Horizon III consist of basket-hopper mortars, mortars and pestles, and diverse and plentiful chipped stone assemblages with broad leaf-shaped blades

and heavy, often stemmed, projectile points. Bone and antler tools are present to some degree but not in the quantity seen during later phases, along with occasional use of bitumen (asphalt) and steatite. Faunal assemblages often include terrestrial mammals representing wild game, along with some marine mammal bones and often high densities of shellfish remains.

The Middle Holocene also marks a time of cultural innovation in the archaeological record of California. Significant cultural developments are seen in the increasing formation of larger settlements, the intensification of long-distance trade networks including distinct cultural spheres throughout western North America, and the elaboration of art and personal aesthetics (e.g., shell and stone pendants and an increasing variety of shell bead types and styles) (Erlandson and Glassow 1997; Glassow 1997; Howard and Raab 1993; Jenkins and Erlandson 1996; King 1990; Raab and Howard 2000; Vellanoweth 2001).

#### ***Horizon IV—Late Prehistoric (AD 500–1769)***

In the Late Prehistoric Horizon, there was an increase in the use of plant food resources in addition to an increase in terrestrial and marine 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 composite bone gorges and circular shell 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. Olivella shell bead styles include a variety of wall and callus beads in addition to the previous spire-lopped and cup beads. There was also an increased use of asphaltum (also known as bitumen) for waterproofing basketry and caulking canoes and as an adhesive. (Late Prehistoric burial practices are discussed in the Ethnographic Overview section below.)

Technological markers of this Horizon as described by Wallace (1955) include the increased use of the bow and arrow, stemless points with concave or convex bases, steatite containers, widespread use of asphaltum as an adhesive, increased abundance and types of bone tools as well as shell, bone, and stone ornaments. Wallace also describes notable distinctions between northern and southern groups during this period, including less pottery north of Orange County, where steatite vessels were more prevalent, and the presence of portable mortars and pestles and basket-hopper slabs in the north, with bedrock mortars and milling stones more prevalent in the San Diego area.

By AD 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that occupants were trading with neighboring groups to the south and east for ceramics. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that was caulked with bitumen (asphaltum) and 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) particularly at the mouths of large mainland coastal canyons and drainages with year-round water supplies (McLendon and Johnson 1999). 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 approximately 1769, which occurred as early as 1542, is divided into three regional patterns: Chumash/Canaliño (Santa Barbara and Ventura Counties), Takic/Numic (Los Angeles, Orange, and western Riverside Counties),



and Yuman (San Diego County). The seemingly abrupt introduction of cremation, pottery, and small triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside Counties at the beginning of the Late Prehistoric Period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino, Juaneño, and Luiseño people in this region are considered 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 Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade (Figure A-7).

The name “Gabrielino” (sometimes spelled Gabrieleno or Gabrieleño) is taken from the association with Mission San Gabriel, whereas Native Americans living in the region surrounding Mission San Fernando came to be known as the Fernadeño. After Spanish colonization, Mission San Gabriel included natives of the greater Los Angeles area, as well as members of surrounding groups such as Kitanemuk, Serrano, and Cahuilla. There is little evidence that the people we call Gabrielino had a broad term for their group (Dakin 1978:222); rather, they identified themselves as an inhabitant of a specific community with locational suffixes (e.g., a resident of *Yaanga* was called a *Yabit*, much the same way that a resident of New York is called a New Yorker; Johnston 1962:10). Native words suggested as labels for the broader group of Native Americans in the Los Angeles region include *Tongva* (or *Tong-v*; Merriam 1955:7–86) and *Kizh* (*Kij* or *Kichereno*; Heizer 1968:105); these same terms are used for self-designation by some contemporary descendant groups. The term Gabrielino is used in the remainder of this report to designate native people of the Los Angeles Basin and their descendants.

The Gabrielino subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the people 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 Horizon). 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).

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

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

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

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

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

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

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

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

The Project site is located within the traditional territory of the Gabrielino (King 2004; McCawley 1996:36–40). In general, it has proven very difficult or impossible to establish the precise location of Native American villages occupied after the Spanish first arrived (McCawley 1996:31–32). Native American place names referred to at this time did not necessarily represent a continually occupied settlement within a discrete location. Instead, in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features subject to change over generations (see Johnston 1962:122). Many of the villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point the former village sites were affected by urban and agricultural development, and Native American lifeways had been irrevocably changed. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference, further confound efforts at relocation. McCawley quotes Kroeber (1925:616) in his remarks on the subject, writing that “the opportunity to prepare a true map of village locations ‘passed away 50 years ago’” (McCawley 1996:32). Thus, even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Although the precise location of any given village is subject to much speculation, it is clear the banks of the Los Angeles River were home to many Gabrielino villages throughout the greater Los Angeles area. The closest ethnographically documented village to the Project site is Yaanga (alternative spellings and names include Yang-na, Yangna, and Yabit; see Figure A-6 and Figure A-8). Though the actual location is disputed, generally Yaanga is believed to have been located near present-day Union Station, approximately 2.7 km (1.7 miles) northeast of the Project site (McCawley 1996:57; Morris et al. 2016). Historical records place Yaanga near Los Angeles’s original plaza, near present-day Union Station (see Figure A-8). Historians and archaeologists have presented multiple possible village locations in this general area; however, like the pueblo itself, it is likely that the village was relocated from time to time due to major shifts of the Los Angeles River during years of intense flooding. Dillon (1994) presented an exhaustive review of the potential locations, most within several blocks of the pueblo plaza. Johnston (1962:122) concluded that “in all probability *Yangna* lay scattered in a fairly wide zone along the whole arc [from the base of Fort Moore Hill to Union Station], and its bailiwick included as well seed-gathering grounds and oak groves where seasonal camps were set up.” A second village, known as Geveronga, has also been described in ethnographic accounts as immediately adjoining the Pueblo of Los Angeles, though much like Yaanga, its location can only be inferred from ethnographic information (McCawley 1996:57). The approximated location for Geveronga is 1.76 km (1.1 miles) north-northeast of the Project site (see Figure A-6).

Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence of the location of either village has been produced to date. Archaeological materials reportedly were unearthed during the construction of Union Station in 1939, and “considerably more” in 1970 during the rebuilding of the Bella Union Hotel on the 300 block of North Main Street, one mile northeast of the Project site (Johnston 1962:121; Robinson 1979:12). The preponderance of available evidence indicates that there were one or more early Historic-period Native American communities west of the Los Angeles River near the original plaza site. This assumption is supported through several lines of ethnographic evidence, including the expedition journal of Fr. Juan Crespi and engineer Miguel

Costansó, both of whom were associated with the 1769 Portolá expedition. The notes from these sources indicate the village was located between 2.0 and 2.4 km (1.3 and 1.5 miles) west-southwest from the Los Angeles River on high-level ground. The Pueblo of Los Angeles was documented to have been founded directly adjacent to this village. The location of Yaanga was also referenced by long-time Los Angeles resident Narciso Botello and Gabrielino consultant José María Zalvidea, who indicated that Yaanga was originally located adjacent to the original site of the Los Angeles plaza (Morris et al. 2016:112).

After the settlement of Los Angeles in 1781, Yaanga faced many new challenges because of its proximity to the new city. The last recorded birth at Yaanga is believed to have been in 1813, after which the village was forced to relocate south of the original site (Morris et al. 2016:97). This new village, known as *Ranchería de los Poblanos* by the Angelenos, is believed to have been located at the intersection of Los Angeles Street and 1st Street (Morris et al. 2016:96–97). This rancheria existed for approximately 10 years, between 1826 and 1836, after which the indigenous population was forced to relocate to a plot of land near Commercial and Alameda Streets (Morris et al. 2016). This rancheria existed for approximately another 10 years, between 1836 and 1845, during which nearby landowners attempted to forcibly relocate them to obtain more land for agricultural use. When they were finally successful, the Native American community was once again forced to relocate even further east, across the Los Angeles River to a site called Pueblito, which itself was razed in 1847, at which time legislation was passed to require the indigenous population to live in dispersed settlements or with their employers throughout the city.

There was another rancheria within the boundaries of Los Angeles during this time composed of Island Gabrielino—*Rancheria de los Pipimares*. The rancheria may have been in existence from as early as 1820 but ceased to exist after 1846 (Morris et al. 2016). Archival research identified the likely location of *Rancheria de los Pipimares* to be within the area of San Pedro and 7th Streets (Morris et al. 2016; see Figure A-8), approximately 1.45 km (0.9 mile) east of the Project site.

## **Historic Period**

The history for the state of California after European colonization 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 that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

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

### ***Mexican Period (1822–1848)***

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

Extensive land grants were established in the interior during the Mexican period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico’s independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

### ***American Period (1848–Present)***

War in 1846 between Mexico and the United States began at the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. This battle was a defeat for the Americans and bolstered the Californios’ resolve against American rule, emboldening them to continue the offensive in later battles at Dominguez Field and in San Gabriel (Beattie 1942). This early skirmish was not a sign of things to come, and the Americans were ultimately the victors of this 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 southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941).

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

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

## **LOS ANGELES: FROM PUEBLO TO CITY**

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

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

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

### **Downtown Los Angeles**

Today, the Project site is located in the southern portion of downtown Los Angeles in an area known as South Park. This portion was developed as the southwestern extension of the so-called lower district, which was one of the earliest locations to be developed outside the historic core of the Los Angeles Pueblo. The lower district was originally laid out in E. O. C. Ord's survey in 1849, conducted immediately following the city's incorporation, and by 1857 was included in Hancocks expanded plat of the city (see Figure A-8). During the previous Spanish and Mexican Periods, the area was predominantly used for ranching and agriculture. The newly created streets within the lower district and its extensions were slightly skewed but were oriented in keeping with the Spanish grid used to establish the Pueblo. The measurements for block sizes designated in Ord's contract were ignored in favor of much smaller sizes, though the reasoning is not known (Crandell 2010:74). Following the completion of the transcontinental railroad to San Francisco in 1869, the massive influx of people to California eventually moved south and quickened the urbanization of the city. Development continued at a reasonable pace through the 1870s. By 1877 a residential neighborhood was firmly established and included homes of some of Los Angeles's wealthiest individuals. The transition from a single-family residential area to a dense retail and commercial district took place in the last few decades of the nineteenth century as the 1880s population boom took hold.

### **Historical Development of the Project Site**

The Historical Resources Technical Report prepared for the Project by Teresa Grimes | Historic Preservation (Grimes 2021) includes a detailed discussion of historical developments within the Project site after the 1880s. The following section summarizes portions of that study. The block containing the Project site was originally owned by Victor Ponet and was known as Fiesta Park, used for festivals, sporting events, and police drills. The first developments within the block occurred between 1906 and 1913 with two hotels. The Motor Car Dealers of Los Angeles staged their first automobile show in the remaining portions of Fiesta Park in 1910, after which time the block came to be known as the city's automobile row, featuring car sales and repair facilities for automobile sales and service, which continued for another 50 years. The heirs of Ponet's estate developed the remaining parcels in the block during the 1910s and 1920s. The last parcels of the block to be developed were those containing the Project site at the corner. In 1931, a three-story building was constructed with adjacent parking, which remains today.

### **CHRIS RECORDS SEARCH**

On June 28, 2018, CAJA Environmental Services (the environmental consultant for the Project) conducted a CHRIS records search at the South Central Coastal Information Center (SCCIC) on the campus of California State University, Fullerton, to identify previously documented archaeological resources within a 0.8-km (0.5-mile) radius of the Project site. The SCCIC maintains records of previously documented archaeological resources (including those that meet the definition of a tribal cultural resource) and technical studies; it also maintains copies of the California Office of Historic

Preservation's (OHP's) portion of the Historic Resources Inventory. Confidential CHRIS results include specific information on the nature and location of sensitive archaeological sites, which should not be disclosed to the public or unauthorized persons and are exempt from the Freedom of Information Act. The information included in a confidential CHRIS records search is needed to assess the sensitivity for undocumented tribal cultural resources and inform the impact analysis. The search included any previously recorded archaeological resources (i.e., excluding historic buildings) within the Project site and surrounding 0.8-km (0.5-mile) area. Results of the CHRIS records search are included in Attachment C.

The CHRIS records search indicated that 64 cultural resources studies have been previously conducted within a 0.5-mile radius of the Project site. None of these studies were conducted directly within the Project site or included an assessment of tribal cultural resource sensitivity relevant to the current study.

No tribal cultural resources were identified in the CHRIS records search, though 34 built-environment resources were identified within a 0.5-mile radius. In addition, three resources listed in the CRHR and identified as a Los Angeles Historic-Cultural Monument were identified within a 0.5-mile radius. No archaeological sites that may qualify as a tribal cultural resource were identified within a 0.5-mile (0.8-km) radius of the Project site.

## **NATIVE AMERICAN COORDINATION**

### **Sacred Lands File Search**

On June 25, 2018, the NAHC submitted the results of an SLF search in response to the City's request. The results of the SLF were negative. In the response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of tribal cultural resources within the Project site, and that the CHRIS and SLF are not exhaustive. The NAHC's response to SWCA's request included a list of eight Native American contacts who may have knowledge of cultural resources in or near the study area and recommended they be contacted prior to work. The SLF results letters are included in Attachment D.

### **Tribal Consultation**

Pursuant to PRC Section 21080.3.1, the City sent notification letters on October 19, 2020, to the ten California Native American tribes on the City's AB 52 Notification List (Table 1). The letters described the proposed Project and asked for a written reply if consultation was requested. As of the date of this report, no responses were received.

**Table 1. Native American Outreach Results**

<b>Name, Title</b>	<b>Affiliation</b>
Linda Candelaria, Co-Chairperson	Gabrieleno/Tongva Tribe
Robert F. Dorame, Chairperson	Gabrieleno/Tongva Indians of California Tribal Council
Sam Dunlap, Cultural Resources Director	Gabrieleno/Tongva Nation
Kimia Fatehi	Fernandeño Tataviam Band of Mission Indians
Sandonne Goad, Chairperson	Gabrieleno/Tongva Nation
Michael Mirelez, Cultural Resources Coordinator	Torres Martinez Desert Cahuilla Indians
Anthony Morales, Chairperson	Gabrieleno/Tongva San Gabriel Band of Mission Indians
Joseph Ontiveros, Cultural Resources Director, and Ms. Morillo	Soboba Band of Luiseño Indians



Name, Title	Affiliation
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians-Kizh Nation
John Valenzuela, Chairperson	San Fernando Band of Mission Indians

## **SENSITIVITY ASSESSMENT**

### **Methods**

Although not all tribal cultural resources are archaeological in nature, those likely to be preserved below the surface are likely to fit the definition of an archaeological and tribal cultural resource. Similarly, the evaluation of a tribal cultural resource must consider the cultural values to a California Native American tribe, in addition to scientific and archaeological considerations. This section assesses the potential (i.e., sensitivity) for tribal cultural resources that are archaeological in nature to be preserved below the surface of the Project site. This sensitivity assessment considers archaeological, ethnographic, historical, environmental, and other archival data sources. Evidence from these sources is used to estimate whether the location was favorable for Native American habitation, the environmental setting within the last 13,000 years, land uses within region, and any alterations to the physical setting within the Project site that may have occurred from natural causes or historic-period developments and influenced the potential for preserving buried materials.

Where sites are fully paved or otherwise developed and directly testing for such buried materials is not feasible, indirect evidence is used. For this reason, the resulting sensitivity assessment is qualitative by nature—ranging along a spectrum of increasing probability—designated here as low, moderate, and high. Indicators of favorable habitability for Native American sites are proximity to certain natural features (e.g., perennial water source, plant or mineral resource, animal habitat), flat topography, and historically dry conditions (i.e., not directly within standing water). The assessment also considers whether the general location is described in ethnographic studies and oral histories, and whether the area of interest is similar to the physical setting in which other Native American archaeological sites have been identified. Next, the sensitivity assessment considers whether the location is capable of containing buried deposits, including whether there are natural or historic-period developments that have eroded, displaced, or otherwise destroyed any potential materials that may have once been present. 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 are considered as having moderate sensitivity.

Historical maps drawn to scale were georeferenced using ESRI ArcMAP v10.5 to show precise relationships to the Project site. Sources consulted included the following publicly accessible data sources: City of Los Angeles Office of Historic Resources (OHR) (SurveyLA); City of Los Angeles Department of Building and Safety (building permits); David Rumsey Historical Map Collection; Huntington Library Digital Archives; Library of Congress; Los Angeles Public Library Map Collection; Sanborn Fire Insurance Company Maps (Sanborn maps); USGS historical topographic maps; University of California, Santa Barbara, Digital Library (aerial photographs); and University of Southern California Digital Library. Portions of the environmental and historical context were also informed by reports prepared for the Project, including those from the geotechnical study by GeoPentech, Inc. (Hadidi et al. 2020) and the historical resources technical report prepared by Teresa Grimes | Historic Preservation (Grimes 2021).

## **Results**

No tribal cultural resources were identified in a CHRIS records search within the Project site. The NAHC's SLF records search did not identify any sacred lands or sites in the Project site. Review of ethnographic literature and historical maps document significant Native American villages and sites nearby. The Gabrielino village known as Yaanga is the closest ethnographically documented Native American community to the Project site. Yaanga is estimated to have been located in the area between the Los Angeles plaza and present-day Union Station, approximately 2.7 km (1.7 miles) northeast of the Project site. Significant archaeological deposits were recorded at the Metropolitan Water District Headquarters building 3.4 km (2.1 miles) northeast of the Project site, which included Native American burials and other material remains that are considered tribal cultural resources. Archival research identified the site of a rancheria populated by Island Gabrielino (i.e., from San Nicolas Island, also referred to as Nicoleño). The site was known as Rancheria de los Pipimares (Island Indian village) and is estimated to have been approximately 1.45 km (0.9 mile) east of the Project site, between 7th and 8th Streets, west of San Pedro Street. The Gabrielino at Rancheria de los Pipimares were recorded as having observed festivals and mourning rituals believed to be the kotuumot kehaay (mourning ceremony), the origins of which predate the Mission period (1769–1834) by at least 2,000 years. No material evidence has been identified from the rancheria.

The Project site is located in the southern portion of the City's original 1849 annexation boundary and the part of downtown known as South Park. A portion of the Project site was originally developed in 1931 with a three-story building and a surface parking lot. The construction of the building in the northeastern portion of the Project site is likely to have substantially compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been deposited on the surface or shallowly buried. The paved surface parking lot in the southwestern parcel of the Project site likely remained an undeveloped lot until the early 1930s. Bore logs taken from this part of the Project site during geotechnical testing identified up to 5 feet of artificial fill in both of the samples taken. There is no clear indication whether the stratum is composed entirely of imported sediment (i.e., fill) or if it is merely the zone in which historical disturbances have occurred, and there are too few bores to know whether the stratum is uniform across the Project site. However, based on the historic period developments within the Project site and SWCA's interpretation of the sediment profiles, across the entire Project site, the sensitivity for tribal cultural resources within the near-surface is considered low.

It has been demonstrated elsewhere in the downtown portion of Los Angeles that deeply buried archaeological deposits can exist within alluvium below historic-period disturbances and may also be intermixed with historic-period debris. Alluvial deposits within the Los Angeles Basin can be massive, extending hundreds of feet below the surface and containing sediments deposited long before human presence in North America. Furthermore, most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, while low-energy floods tend to produce more favorable environments for the preservation of cultural materials. Thus, low-energy alluvial sediments that also date to the Late Pleistocene or Holocene time periods (the last 13,000 years) have the greatest potential for preserving buried tribal cultural resources. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered. Also, although such soil conditions are an indicator of a setting favorable for preservation, the presence of such soils alone is not an absolute indicator of tribal cultural resources presence.

The Project site is located within the Los Angeles River floodplain and would have been exposed to periodic flooding throughout the Late Pleistocene or Holocene time periods. The south-flowing Los Angeles River is currently located approximately 3.2 km (2.0 miles) east of the Project site. Prior to 1825 the Los Angeles River flowed west from downtown, and beginning in 1815 the main channel was located

approximately 1.1 km (0.7 mile) to the southeast. Evidence suggests the Los Angeles River shifted courses frequently with two of its major floodplains in the area south of downtown Los Angeles—one along its current southern alignment and one heading west towards the Baldwin Hills. Sediment profiles compiled from geotechnical bores identified natural strata of Late Pleistocene and early Holocene-age alluvium, which has accumulated in part as a result of flooding along the Los Angeles River. The alluvial sediments are composed of silt sand deposits up to 15 feet thick with fine to coarse gravels towards the bottom. Below this is a relatively thick clay deposit, indicative of periods with standing water. These deposits of alluvium are consistent with depositional trends for the Los Angeles Basin, which was subject to shifting courses of the Los Angeles River and episodic flooding. The deposition is consistent with general trends for the Los Angeles Basin and those specifically within the floodplain of the Los Angeles River. The sediment bores from the Project site lack many indications of high-energy flooding that would suggest a relatively favorable preservation setting.

While there are known significant Native American village sites located in the general vicinity of the Project site, such as Yaanga and Rancheria de los Pipimares, the Project site is not located near or in a comparable environmental setting to suggest an increased likelihood for associated tribal cultural resources to be discovered within the Project site. The Project site is set within what has been a broad floodplain of the Los Angeles River for which there are only generalized indicators of former use by Native Americans such that substantial material deposits are likely to have occurred. These generalized indicators include a reasonable proximity to former stream courses and important natural resources that occur in higher densities near waterways. Late Pleistocene and early Holocene-aged alluvium below the artificial fill within the Project site appears to be relatively favorable for preservation of buried tribal cultural resources; however, the impacts to the near-surface from historic-period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on these findings, the sensitivity for tribal cultural resources at the Project site is considered low.

## **STUDY CONSTRAINTS AND DISCLAIMER**

In creating the category of tribal cultural resources, the legislative intent of AB 52 is expressly stated as seeking to consider “the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation” and “recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated” (Gatto 2014). Analysis of tribal cultural resources in the absence of information provided by local tribes, therefore, is considered to be constrained insofar as the evidence considered may be confined to published, academic, and archaeological sources, and the conclusions can only be considered as representing scientific and archaeological values. The analysis and conclusions stated herein are based on the expertise and professional judgement of SWCA’s qualified archaeologists and are intended to present information that can be used in assessing the potential for tribal cultural resources under CEQA, and should not be considered a replacement for tribal expertise or assumed to represent tribal cultural values.

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**ATTACHMENT A**  
**Report Figures**



Figure A-1. Project vicinity.

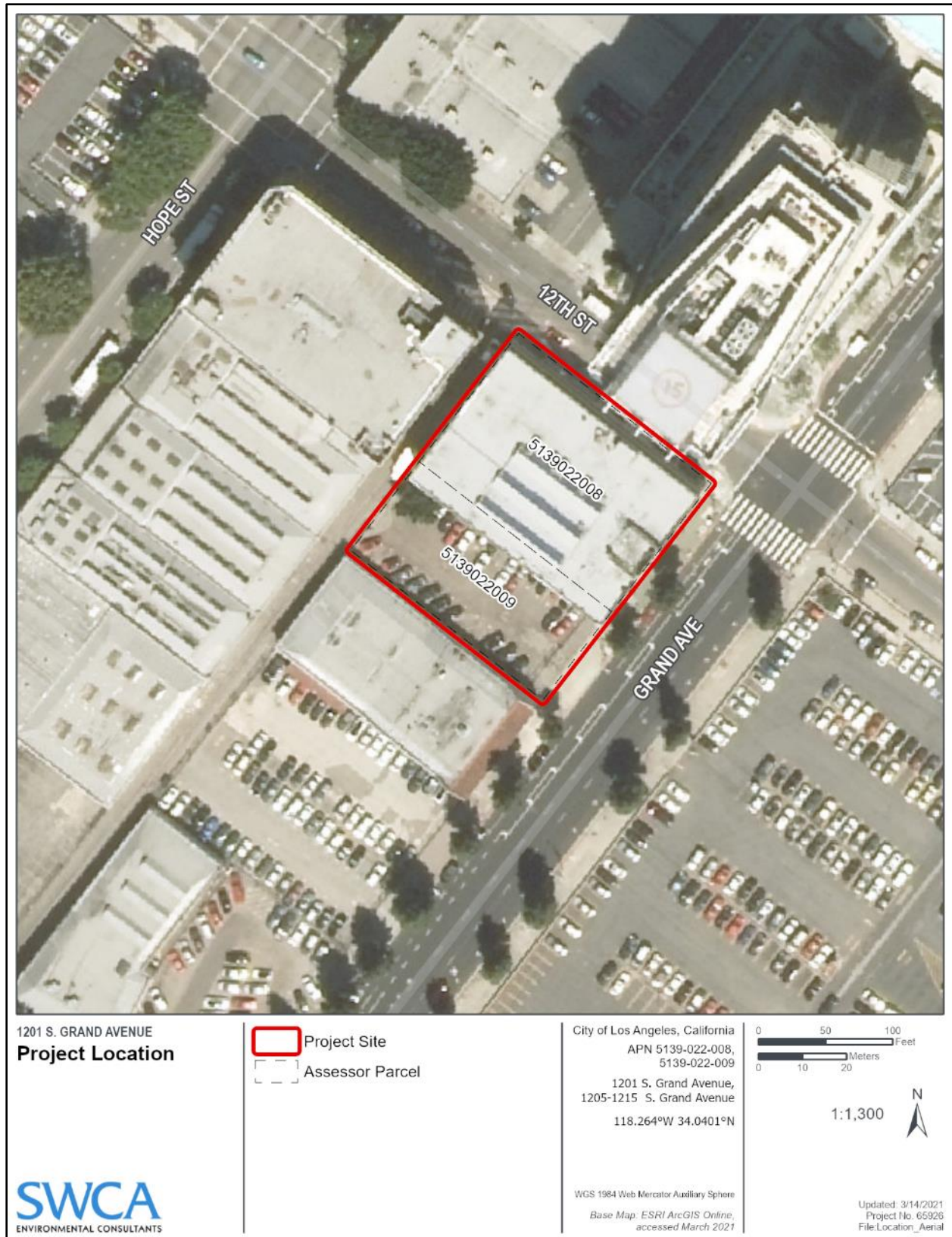


Figure A-2. Project location with associated parcels plotted on a 2013 aerial.



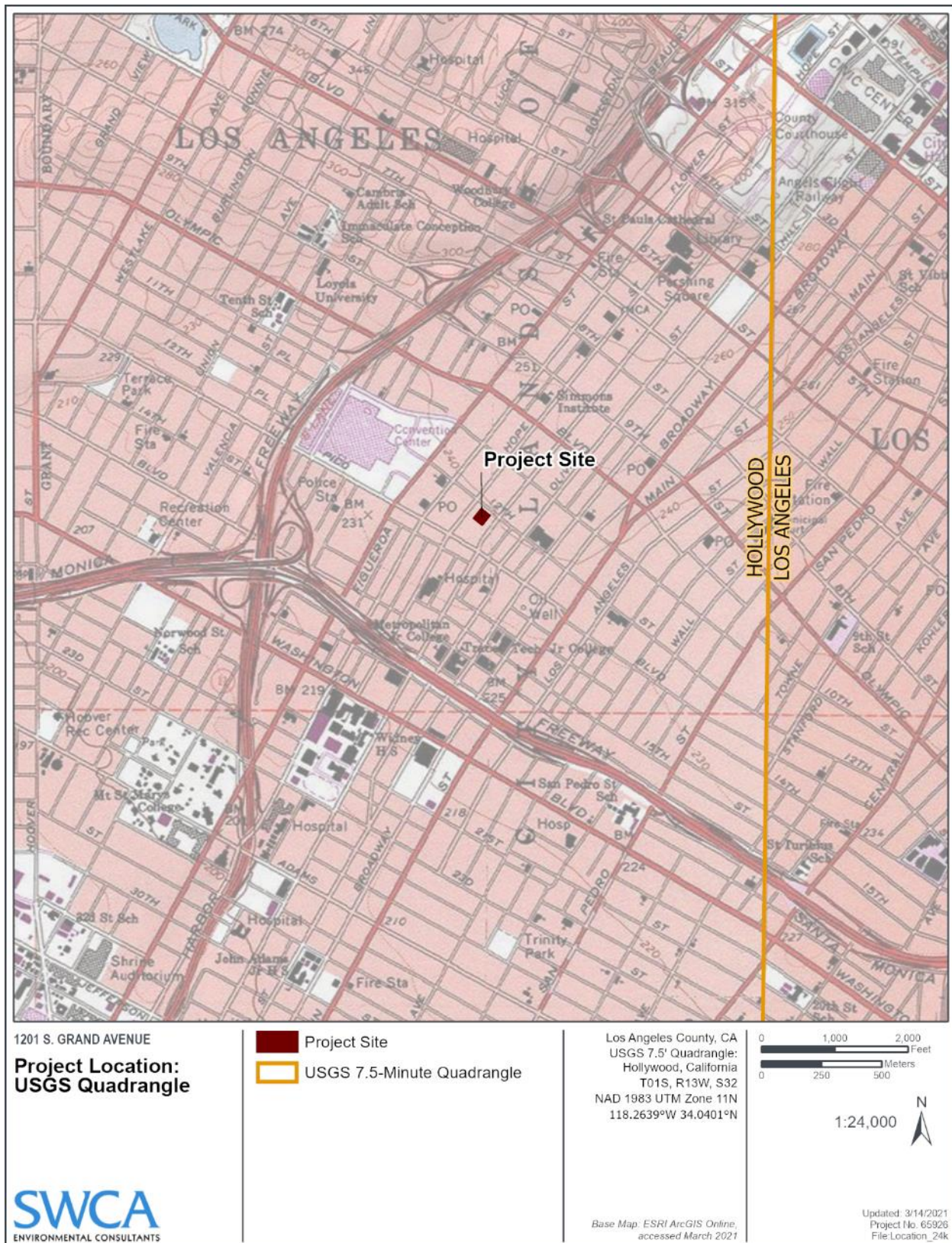


Figure A-3. Project location plotted on USGS 7.5-minute quadrangle, Hollywood, California.

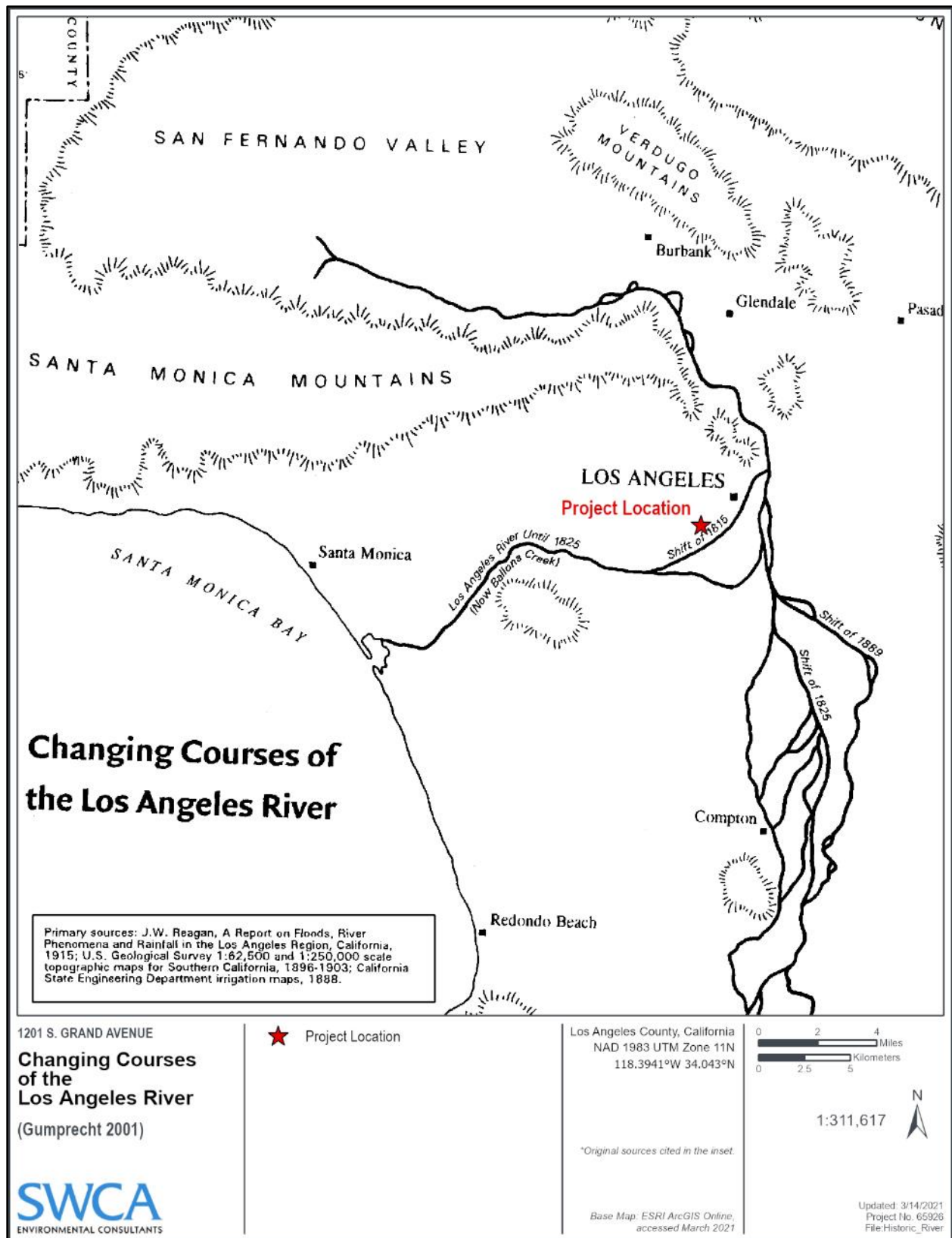


Figure A-4. Historical shifts in the Los Angeles River channels as depicted by Gumprecht (2001:140); original sources listed in the inset.



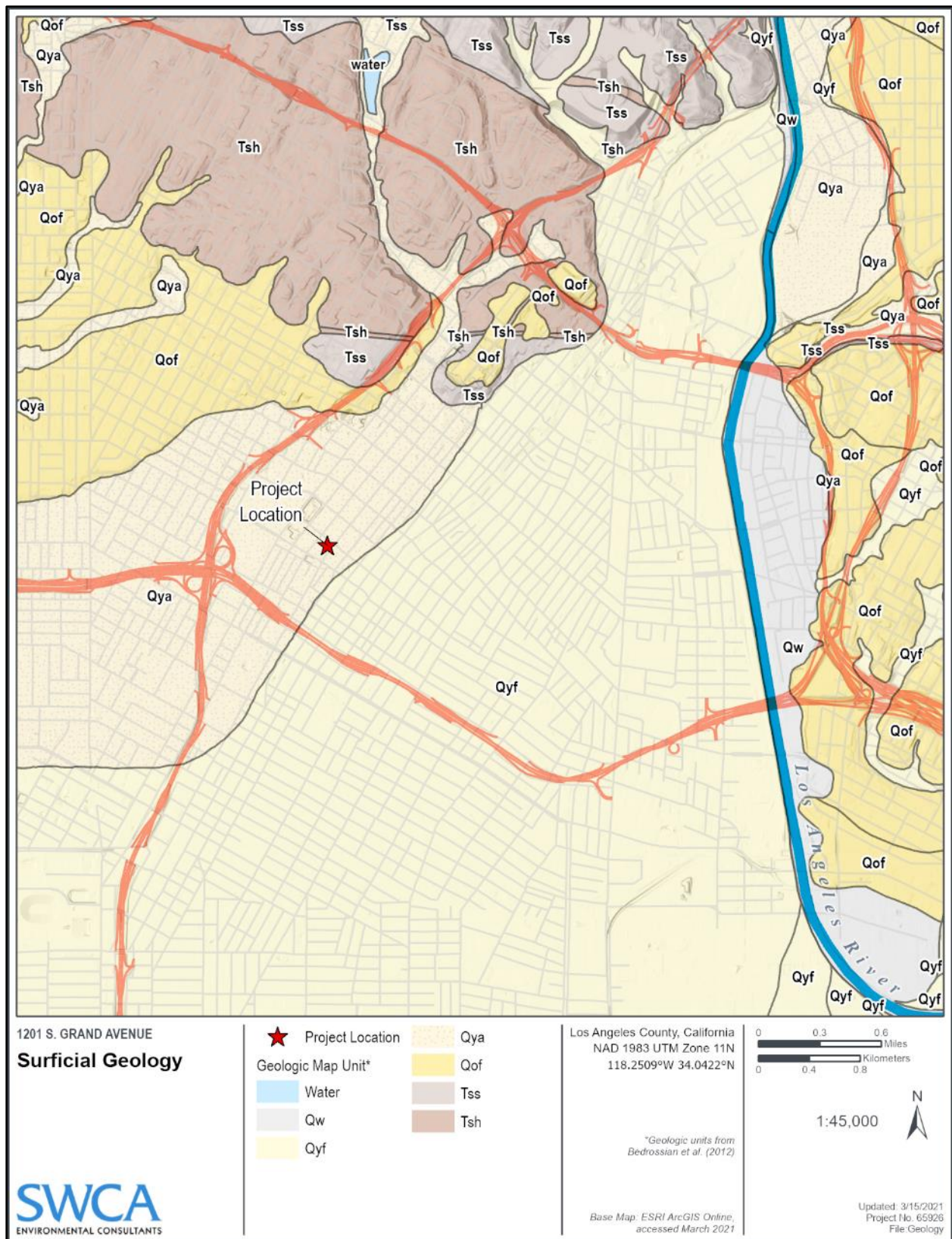


Figure A-5. Surficial geology (Bedrossian et al. 2012): Qya—Young Alluvial Valley Deposits; Qof—Young alluvium (late Pleistocene).



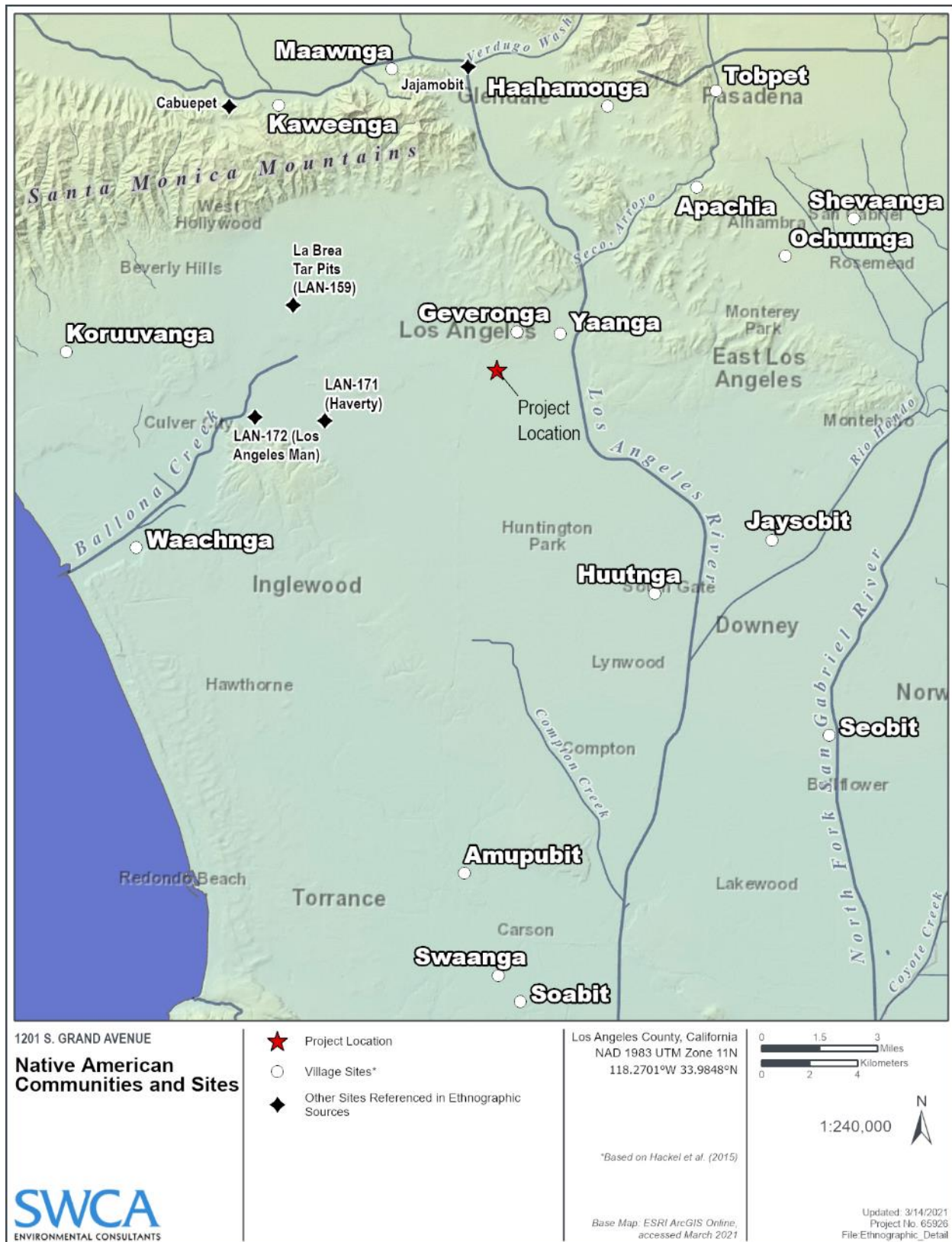


Figure A-6. Native American communities and sites in the greater Los Angeles area; locations from Hackel et al. (2015).



**Figure A-7. Approximate boundaries of traditional tribal territories within southern California based on Kroeber (1925), Heizer (1978), and d'Azevedo (1986).**



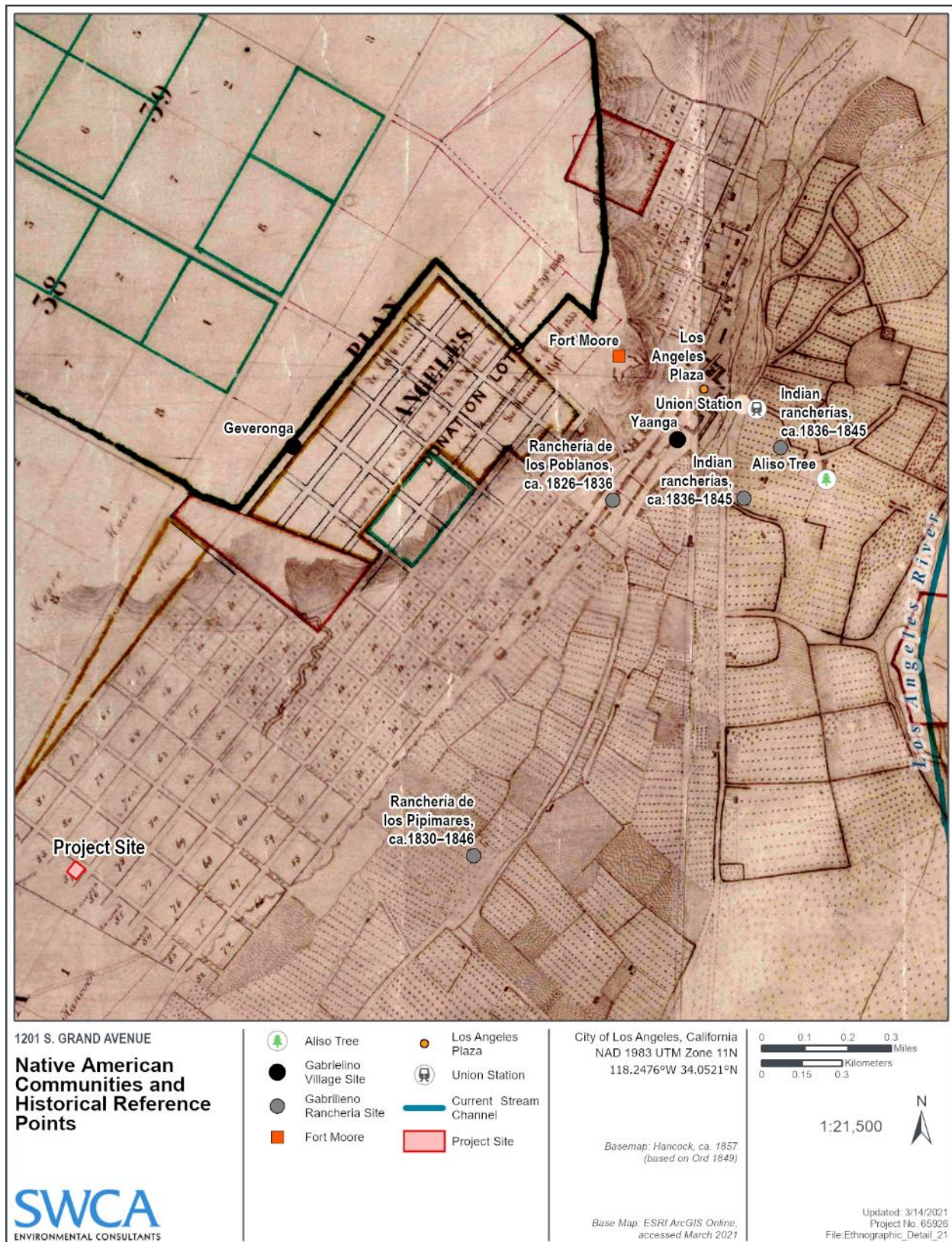


Figure A-8. Native American communities and historical points of reference in the downtown area of Los Angeles, plotted on an appended copy of Hancock's 1857 survey plat of Los Angeles, which was an extension of Ord's 1849 original survey.

**ATTACHMENT B**  
**Condition of Approval—Tribal Cultural Resources**

### **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) 978-1454.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist 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 activities, the following procedures shall be followed:

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

#### **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.

**ATTACHMENT C**  
**South Central Coastal Information Center Records Search Results**

## South Central Coastal Information Center

California State University, Fullerton  
Department of Anthropology MH-426  
800 North State College Boulevard  
Fullerton, CA 92834-6846  
657.278.5395

### *California Historical Resources Information System*

*Los Angeles, Orange, Ventura and San Bernardino Counties*

[sccic@fullerton.edu](mailto:sccic@fullerton.edu)

6/28/2018

SCCIC File #: 19111.5109

Ms. Rachel Zacuto  
CAJA Environmental Services, LLC  
15350 Sherman Way, Ste 315  
Van Nuys, CA 91406

Re: Records Search Results for the 1201 S Grand Ave Project

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Hollywood, CA USGS 7.5' quadrangle. The following summary reflects the results of the records search for the project area and a ½-mile radius. The search includes a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the above referenced project site and a ¼-mile radius. Due to the sensitive nature of cultural resources, archaeological site locations are not released.

#### RECORDS SEARCH RESULTS SUMMARY

<b>Archaeological Resources *** (see below)</b>	Within project area: 0 Within project radius: 0
<b>Built-Environment Resources</b>	Within project area: 0 Within project radius: 34
<b>Reports and Studies</b>	Within project area: 0 Within project radius: 40
<b>OHP Historic Properties Directory (HPD)</b>	Within project area: 0 Within project radius: 64
<b>California Points of Historical Interest (SPHI)</b>	Within project area: 0 Within project radius: 0
<b>California Historical Landmarks (SHL)</b>	Within project area: 0 Within project radius: 0
<b>California Register of Historical Resources (CAL REG)</b>	Within project area: 0 Within project radius: 3
<b>National Register of Historic Places (NRHP)</b>	Within project area: 0 Within project radius: 0



<b>City of Los Angeles Historic-Cultural Monuments (LAHCM)</b>	Within project area: 0 Within project radius: 15
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**HISTORIC MAP REVIEW** – Santa Monica, CA (1902) 1:62,500 scale historic maps indicated that in 1902 the city of Los Angeles was already present. The area was highly developed with numerous improved roads and buildings present in a dense urban grid.

## RECOMMENDATIONS

The archaeological sensitivity of the project location is unknown because there are no previous studies for the subject property. Additionally, the natural ground-surface appears to be obscured by urban development; consequently, surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the project area, buried resources could potentially be unearthed during project activities. Additionally, buried remains of the Zanja Madre (historical water conveyance system) are potentially within the project boundaries. Only small portions of this historic archaeological resource have been officially recorded. However, maps of the resource's vast network show that there is a strong potential for this resource to be within or adjacent to the project site. Therefore, it is recommended that an archaeologist be retained to monitor ground-disturbing activities. It is also recommended that any historic properties - 45 years and older - be identified, recorded, and evaluated for local, state, or national significance if required by the lead agency.

For your convenience, you may find a professional consultant\* at [www.chrisinfo.org](http://www.chrisinfo.org). Any resulting reports by the qualified consultant should be submitted to the South Central Coastal Information Center as soon as possible.

\*The SCCIC does not endorse any particular consultant and makes no claims about the qualifications of any person listed. Each consultant on this list self-reports that they meet current professional standards.

If you have any questions regarding the results presented herein, please contact the office at 657.278.5395 Monday through Thursday 9:00 am to 3:30 pm. Should you require any additional information for the above referenced project, reference the SCCIC number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the [California](#) [Historical](#) [Resources](#) [Information](#) [System](#),

*Stacy St. James*

Michelle Galaz  
Assistant Coordinator

\*\*\* There are no archaeological resources recorded in the project area. However, when we report that no archaeological resources are recorded in your project area or within a specified radius around the project area; that does not necessarily mean that nothing is there. It may simply mean that the area has not yet been studied and that no information regarding the archaeological sensitivity of the property is available. The reported records search result does not preclude the possibility that surface or buried artifacts may be found during a survey of the property or ground-disturbing activities.

*Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.*

*The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.*

**ATTACHMENT D**  
**Sacred Lands File Search Results**

**NATIVE AMERICAN HERITAGE COMMISSION**

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



June 25, 2018

May Sirinopwongsagon  
City of Los Angeles

Sent by E-mail: may.sirinopwongsagon@lacity.org  
Cc: rachel@ceqa-nepa.com

RE: Proposed 1201 S. Grand Avenue Project, City of Los Angeles; Hollywood USGS Quadrangle, Los Angeles County, California

Dear Ms. Sirinopwongsagon:

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 measures.

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 public 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 will 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](mailto:gayle.totton@nahc.ca.gov).

Sincerely,



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

**Native American Heritage Commission  
Tribal Consultation List  
Los Angeles County  
6/25/2018**

***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

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

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

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

Anthony Morales, Chairperson  
P.O. Box 693      Gabrielino  
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.,      Gabrielino  
#231  
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  
Newhall, CA, 91322      Serrano  
Phone: (503) 539 - 0933      Tataviam  
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 1201 S. Grand Avenue Project, Los Angeles County.