

Appendix D
**Archeological Resources
Report**



5700 HANNUM AVENUE MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Archaeological Resources Assessment Report

Prepared for

Lincoln Property Company West, LLC
915 Wilshire Boulevard, Suite 2050
Los Angeles, CA 90017

October 2023



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Prepared for:

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915 Wilshire Boulevard, Suite 2050
Los Angeles, CA 90017

October 2023

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Project Location:

Venice (CA) USGS 7.5-minute Topographic Quad
Township 2 South, Range 14 West, Section 19

Acreage: 2.23 acres

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EXECUTIVE SUMMARY

LPC West, the Applicant, proposes to develop a mixed-use residential and commercial project (Project) on an approximately 2.23-acre site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project would demolish the existing uses and would include the construction of a new 6-story mixed-use building, retail space, private open space, and common open space. The Project would excavate to a maximum depth of 27 feet below grade. **Environmental Science Associates (ESA)** has prepared this archaeological resources assessment to identify and evaluate the potential impacts to archaeological resources associated with the Project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included conducting land use history research, a cultural resources records search through the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), review of the Geotechnical Report for the Project, geologic map review, a subsurface sensitivity assessment, and the recommendation of mitigation measures to reduce impacts from the Project to archaeological resources to a less than significant level. The City is the lead agency pursuant to CEQA.

The records search through the CHRIS-SCCIC revealed that no cultural resources have been recorded within the 0.50-mile radius of Project Site. However, a total of six prehistoric archaeological resources (including village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc.) have been recorded in the immediate vicinity of the 0.50-mile radius.

The records search through NAHC's SLF yielded negative results; however, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area. The City is conducting consultation with appropriate tribes per Assembly Bill (AB) 52 requirements and the results of this consultation will be summarized in the Draft Environmental Impact Report for the Project.

As the Project Site is fully developed lacking ground surface visibility, a pedestrian survey was not conducted.

A subsurface archaeological sensitivity assessment indicates that the potential for encountering prehistoric archaeological resources is moderate to high based on the fact that six prehistoric archaeological resources, water sources, and Native American villages are situated in the vicinity of the Project Site. Additionally, fill soils occur within the Project Site (from surface down to 3 feet below ground surface) and a previous development project in Downtown Culver City (that had similar existing uses as the Project Site) yielded two prehistoric metates in disturbed fill

sediments. The subsurface archaeological sensitivity assessment for historic archaeology indicates that no previous historic uses have existed within the Project Site and that no historic-period archaeological resources have been previously recorded within the Project Site or 0.50-mile radius. Based on these results, the potential to encounter historic-period archaeological resources within the Project Site is considered low. ESA recommends implementation of mitigation measures to reduce impacts to prehistoric archaeological resources, which are provided in the *Summary of Results and Recommended Mitigation Measures* section of this report. With implementation of these measures, impacts to archaeological resources would be less than significant under CEQA.

5700 HANNUM AVENUE MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Archaeological Resources Assessment Report

Introduction

LPC West, the Applicant, proposes to develop a mixed-use residential and commercial project (Project) on an approximately 2.23-acre site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing 2-story office building in the northern portion of the Project Site and associated surface parking. The Project would demolish these existing uses and would include the construction of a new 6-story mixed-use building, retail space, private open space, and common open space. The Project would excavate to a maximum depth of 27 feet below grade.

Environmental Science Associates (ESA) has prepared this archaeological resource assessment to identify and evaluate the potential impacts to archaeological resources associated with the Project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included conducting a cultural resources records search through the California Historical Resources Information Center-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the Native America Heritage Commission (NAHC), land use history research, review of a site-specific Geotechnical Report prepared for the Project, geologic map review, a subsurface archaeological sensitivity assessment, and the recommendation of mitigation measures to reduce impacts from the Project to archaeological resources to a less than significant level. The City is the lead agency pursuant to CEQA.

ESA personnel involved in the preparation of this Report are as follows: Monica Strauss, M.A., RPA., Project Director; Kyle Garcia, M.A., RPA, Principal Investigator; Fatima Clark, B.A., report author; and Jaclyn Anderson, GIS specialist. Resumes of key personnel are included in **Appendix A**.

Project Location

The Project Site is located in an urbanized area of the southeastern portion of the city and approximately 0.7 mile east of the San Diego Freeway (I-405) (**Figure 1**). The Project Site is bound by Hannum Avenue to the north, Buckingham Parkway to the east and south, and business park uses to the west (**Figure 2**). The Project Site is situated within Section 19 of Township 2 South, Range 14 West on the Venice, CA U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (**Figure 3**).



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5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 1
Regional and Project Vicinity Location





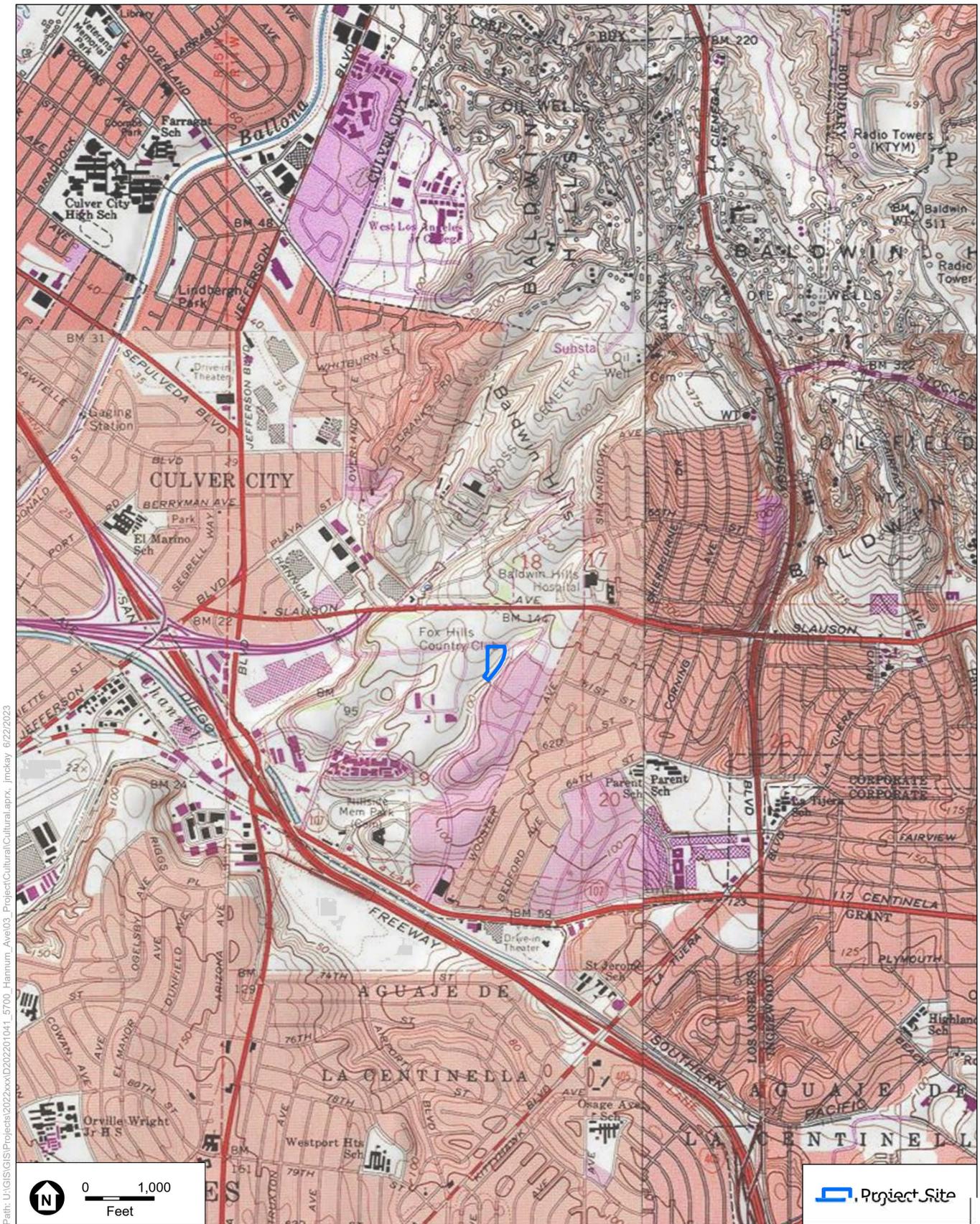
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SOURCE: ESA, 2022; ESRI Imagery, 2022

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2
Aerial Photograph





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SOURCE: Topoquad Venice, 1982; ESRI, 2022; ESA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 3
Project Location



Project Description

The Project Site is currently occupied by an approximately 30,672 square foot two-story office building. The remainder of the Project Site includes surface parking and associated landscaping. The sidewalks adjoining the Project Site to the north, west, and south are landscaped with street trees and trees are scattered throughout the existing surface parking lot. Vehicle access to the Project Site is provided via two ingress and egress points, which are located along Hannum Avenue and Uplander Way.

The Project would demolish the existing surface parking and two-story office building and construct a new multi-family and retail mixed-use building. The Project would include a 6-story building and two subterranean levels that would include a total of 309 multi-family dwelling units (including 27 Very Low Income units) and 5,600 square feet retail use. The Project's 309 residential units would consist of 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. The Project would include a total of 428 vehicular parking spaces (399 residential, 6 guest and 23 commercial), within three parking levels. The Project Site would be fenced during construction for security purposes. The Project would require excavation to accommodate two levels of subterranean parking, footings, and foundations. Earthwork would require a net export of approximately 51,400 cubic yards (cy) of soil. Construction staging would be entirely internal to the Project Site. The Project would excavate to a maximum depth of 27 feet below grade.

Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal State, and local laws governing and influencing the preservation of cultural resources of national, State, regional, and local significance include the following:

- The National Historic Preservation Act of 1966
- The National Register of Historic Places
- Archaeological Resources Protection Act of 1979
- Native American Graves Protection and Repatriation Act of 1990
- Secretary of the Interior's Standards
- The California Environmental Quality Act
- The California Register of Historical Resources
- The California Health and Safety Code
- The California Public Resources Code
- City of Culver City General Plan

Federal

National Historic Preservation Act of 1966

The principal federal law addressing historic properties is the National Historic Preservation Act (NHPA), as amended (54 USC 300101 et seq.), and its implementing regulations (36 CFR Part 800). Section 106 of the NHPA requires a federal agency with jurisdiction over a proposed federal action (referred to as an “undertaking”) to take into account the effects of the undertaking on historic properties, and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on the undertaking.

The term “historic properties” refers to “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register” (36 CFR Part 800.16(l)(1)). The implementing regulations (36 CFR Part 800) describe the process for identifying and evaluating historic properties, for assessing the potential adverse effects of federal undertakings on historic properties, and seeking to develop measures to avoid, minimize, or mitigate adverse effects. The Section 106 process does not require the preservation of historic properties; instead, it is a procedural requirement mandating that federal agencies take into account effects to historic properties from an undertaking prior to approval.

The steps of the Section 106 process are accomplished through consultation with the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, local governments, and other interested parties. The goal of consultation is to identify potentially affected historic properties, assess effects to such properties, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties. The agency also must provide an opportunity for public involvement (36 CFR 800.1(a)). Consultation with Indian tribes regarding issues related to Section 106 and other authorities (such as NEPA and Executive Order No. 13007) must recognize the government-to-government relationship between the Federal Government and Indian tribes, as set forth in Executive Order 13175, 65 FR 87249 (November 9, 2000), and Presidential Memorandum of November 5, 2009.

Under NHPA, the Secretary of Interior is responsible for establishing professional standards and for providing guidance on the preservation of the nation’s historic properties. See below discussion of these standards.

National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA of 1966, as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s historic resources and to indicate what properties should be considered for protection from destruction or impairment” (36 CFR 60.2) (U.S. Department of the Interior 2002). The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. As noted above, a resource that is listed in or eligible for listing in the National Register is considered “historic property” under Section 106 of the NHPA.

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history
- B. Are associated with the lives of persons significant in our past
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- D. Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as the ability of a property to convey its significance. The National Register recognizes seven qualities that, in various combinations, define integrity, including location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity, a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.

Ordinarily, religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the Criteria Considerations (A-G), in addition to meeting at least one of the four significance criteria and possessing integrity.

Archaeological Resources Protection Act of 1979

The Archaeological Resources Protection Act of 1979 (ARPA) (16 USC 470aa-470mm) was enacted to “secure, for the present and future benefit of the American people, the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals.” Under this Act, archaeological resources are defined as material remains of past human life or activities that are of archaeological interest and are over 100 years old. The primary focus of the Act is to protect archaeological resources on public and Indian lands, and to prevent looting and destruction of archaeological resources. The statute provides for stiff civil and criminal penalties, including fines up to \$100,000 and/or 5 years in prison for second-time offenders. The Act also governs archaeological excavation and disposition of collections from sites on public and Indian lands, and requires researchers to obtain a permit prior to excavating or removing any archaeological materials on federal lands. The Act further requires that the nature and location of archaeological resources be kept confidential unless providing the information would further the purposes of the statute and not create a risk of harm to such resources.

Native American Graves Protection and Repatriation Act of 1990

Requirements for responding to discoveries of Native American human remains and associated funerary objects on federal land are addressed under the Native American Graves Protection and

Repatriation Act of 1990 (NAGPRA) (25 USC 3001–3013) and its implementing regulations (43 CFR Part 10). If human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered on federal or tribal lands, the federal agency must determine and consult with the lineal descendants and culturally affiliated Indian tribes, and carry out appropriate treatment and disposition of the discovered remains, including transfer of custody. An *Indian tribe* is defined as any tribe, band, nation, or other organized group or community of Indians that is recognized as eligible for the special programs and services provided by the U.S. to Indians because of their status as Indians. NAGPRA does not require federal agencies to consult with non-federally recognized tribes. However, there are some cases in which non-federally recognized tribes may be appropriate claimants for cultural items. Federal agencies that wish to return Native American human remains and cultural items to non-federally recognized tribes may do so after review and approval by the NAGPRA Review Committee.

NAGPRA also requires permitting of the intentional removal from, or excavation of, Native American cultural items from federal or tribal lands for purposes of discovery, study, or removal; establishes criminal penalties for trafficking in human remains or cultural objects; and requires agencies and museums that receive federal funding to inventory those items in their possession, identify the descendants of and repatriate those items.

Secretary of the Interior’s Standards

The Secretary of the Interior’s Standards (36 Code of Federal Regulations [CFR] Part 68) were originally designed for use by the National Park Service and intended for application in a federal context. The stated intent of the Standards is to “set forth standards for the treatment of historic properties containing standards for preservation, rehabilitation, restoration, and reconstruction” (36 CFR 68.1). One set of standards – preservation, rehabilitation, restoration or reconstruction – will apply to a property undergoing treatment, depending upon the property’s significance, existing physical condition, the extent of documentation available and interpretive goals, when applicable, and are to be applied in a reasonable manner, taking into consideration economic and technical feasibility (36 CFR 68.3). The Standards for Rehabilitation (as defined under 36 CFR 68.3(b)) are most applicable to projects where compatibility with historic building alterations or alterations to a building’s environment is being evaluated and can pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features and the building’s site and environment as well as attached, adjacent, or related new construction.

The Standards were subsequently incorporated into Public Resources Code (PRC) Section 15164.5(b) as a gauge against which lead agencies complying with CEQA could measure project impacts to historical resources. As stated under the prior CEQA subsection, generally a project that complies with the Standards is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3); see also *League for Protection of Oakland’s Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896. Although not prescriptive and as suggested by the term “generally” as used in the PRC, the appropriate application of the Standards, or a subset thereof, requires careful consideration by a lead agency of the specific significance, characteristics, and condition of the historical resource for which impacts are being evaluated.

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at PRC Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include: (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2(g), a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2(g), then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place.¹ If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an

¹ California Public Resources Code Section 21083.1(a), http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21083.2. Accessed February 9, 2021.

archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.²

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”.³ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* is considered to have impacts that are less than significant.⁴

California Register of Historical Resources

The California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”⁵ The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register of Historic Places (National Register) criteria.⁶ Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period

² State CEQA Statute and Guidelines, Section 15064.5(c)(4).

³ State CEQA Guidelines, Section 15064.5(b)(1).

⁴ State CEQA Guidelines, 15064.5(b)(3).

⁵ California Public Resources Code, Section 5024.1[a].
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1. Accessed February 9, 2021.

⁶ California Public Resources Code, Section 5024.1[b].
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1. Accessed February 9, 2021.

property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

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

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone (PRC Section 5024.1(d)-(e).)

California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

California Public Resources Code (PRC)

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Local

City of Culver City General Plan

The City of Culver City's General Plan does not include policies, goals, and objectives for archaeological resources.

Cultural Setting

Prehistoric Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal⁷ B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. (Byrd and Raab 2007). During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab 2007).

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson 1994; Wallace 1955; Warren 1968). The native populations of Southern California were becoming less mobile

⁷ The word 'cal' is used to signify a calibrated date.

and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab 2007). Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA) (Jones et al. 1999). While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected (McCawley 1996). This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited (McCawley 1996). Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources (McCawley 1996).

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (*Pimu* or *Pimugna*) and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl (Byrd and Raab 2007).

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Kroeber 1925). Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith 1978). The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100

inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925).

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino (Wallace 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith 1978).

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht 2001). The closest named settlements to the Project Site are *Saa'anga* and *Waachnga*. Both of these settlements are depicted as located close to Ballona Creek (McCawley 1996).

Historic Setting

History and Early Development of Culver City

Harry H. Culver (1880 -1946), the founder of Culver City, was born in Milford, Nebraska on January 22, 1880. The middle child of five, Culver was raised on a farm along with three brothers and a sister. His father, Jacob Hazel Culver, was a brigadier general in the National Guard and a strict disciplinarian. Culver followed in his father's footsteps, enlisting in the military during the Spanish-American War. He studied at Doane College before spending three years at the University of Nebraska. In 1901, Culver traveled to the Philippines where he began working in the mercantile business, worked as a reporter for the Manila Times, and served as a special agent for the customs department. After more than three years in the Philippines, Culver returned to the United States, performing his customs duties in Detroit and Saint Louis. He resigned from the customs department in 1910 when he moved to California and began working for real estate giant I.N. Van Nuys. "As the story goes, after Van Nuys offered to make him a manager because of his exemplary work, Culver decided to venture out on his own. After intense study, Harry Culver pinpointed the area between Los Angeles and Abbot Kinney's resort of Venice for his city" (Cerra 2013).

At the California Club in 1913, Harry Culver announced his plans to develop a city west of downtown Los Angeles. Culver saw an opportunity to capitalize on the excitement generated by Abbot Kinney's Venice of America development along the California coast south of Santa Monica. Between Venice and Los Angeles sat open land, originally part of Rancho La Ballona, and as the relationship between Los Angeles and Venice took shape, Culver saw a spot in between that was ideal for a new town site. "If you draw a line from the Story Building to the Ocean Front at Venice, at the halfway mark you will find three intersection electric lines—the logical center for what we propose to develop a town-site." Soon after Culver's speech, the city of Culver City was established. Culver promoted his new community by holding special events like "prettiest baby contests" and an annual marathon race. Newspaper advertisements exclaimed "All Roads Lead to Culver City!"

Culver City continued to grow and finally incorporated in 1917 (Cerra 2013). The city grew outward from the downtown commercial area and adjacent film studios. This area saw

commercial development along Culver Boulevard in the 1920s and 1930s, and spread to Washington Boulevard in the 1940s and 1950s, and was surrounded by residential neighborhoods. Downtown Culver City was centered on a main street (Washington Boulevard) anchored by a six-story hotel, Fire and Police Departments, a city hall, banks, restaurants, and stores. The early economics of Culver City were supported by movie studios. Industry came in the form of Western Stove in 1922, then the Helms Bakeries in 1930, and then the Hayden Industrial Tract was established in the 1940s. During the 1950s Washington Boulevard would be improved with a number of car dealerships. Over the years, more than forty annexations increased the size of the city from 1.2 square miles to about five square miles (Cerra 2004).

At the heart of Screenland, the economic health of the city has always been strongly tied to the movie industry. Following the closure of MGM Studios, the city was looking for ways to spur economic development. To spur development and create a new flow of money, the city created the Redevelopment Agency. One of the first projects undertaken by the newly formed agency was the Fox Hills redevelopment. This development would open up more than 300 acres of land just southwest of the city to residential, commercial, and industrial growth (Culver City Historical Society, n.d).

Land Use History of the Project Site

Historic maps and aerial photographs were examined to provide historical information about land uses of the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. Available topographic maps include the 1896 Redondo 15-minute quadrangle and the 1924 Inglewood 7.5-minute quadrangle (TopoView 2023). Aerial photographs include those from the following years: 1923, 1928, 1938, 1947, 1952, 1963, 1970, 1976, 1983, 1994, 2002, 2012, 2016 (Ramboll US Consulting, Inc. 2022), and 2023 (Bing Maps 2023).

The 1896 historic map shows that the Project Site was undeveloped and that Centinela Creek was located 0.65 miles south of the Project Site and Ballona Creek was situated approximately 1.25 miles to the west. The 1923 and 1938 aerials continue showing the Project Site as undeveloped with an intermittent stream crossing the central portion of the Project Site on a northeast to southwest axis. As observed in the aerial photographs from 1938 through 1970, the Project Site is developed with a golf course. The 1976 aerial shows the Project Site as undeveloped. By 1983, the Project Site observed as developed with the current building and parking lot. No changes to the Project Site are observed in the subsequent 1994, 2002, 2012, 2016, and 2023 aerials.

Archival Research

SCCIC Records Search

A records search for the Project Site was conducted on July 14, 2023, at the CHRIS-SCCIC housed at California State University, Fullerton. The records search included a review of all recorded cultural resources and previous studies within the Project Site and a 0.50-mile radius.

Previous Cultural Resources Investigations

The records search results indicate that seven cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 15 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments. Of the eight previous studies, none overlap the Project Site.

Previously Recorded Cultural Resources

The records search results indicate that no cultural resources have been recorded within the 0.50-mile radius of Project Site. However, a total of six prehistoric archaeological resources (CA-LAN-59, -60, -67, -213, -216, -2768) have been recorded in the immediate vicinity of the 0.50-mile radius (**Table 1**).

TABLE 1
PREVIOUSLY RECORDED CULTURAL RESOURCES

P-Number (P-19-)	Permanent Trinomial (CA-LAN-)	Other Designation	Description	Recording Events
59	59	Malcom Farmer's Playa del Rey Site No. 1	Prehistoric archaeological site: village or camp site, including artifacts (steatite bowl, quartz crystal point, "arrowpoints", mortar and steatite fragments, manos, pestles, shell, hammerstones, scrapers, etc. Site reportedly destroyed.	1950
60	60	Malcom Farmer's Playa del Rey Site No. 1	Prehistoric archaeological site: shell midden, "chips", mortar fragments, hammerstones, "chopper", and steatite pieces. Human remains (cranium pieces) and pieces of burned deer bone. Site reportedly destroyed.	1950
67	67	Malcom Farmer's Baldwin Hills Site No. 1	Prehistoric archaeological site: described as a possible temporary dwelling on a small wash. Small amount of shell reported.	1950
213	213	LA-31	Prehistoric archaeological site: metates	1953
216	216	LA-34	Prehistoric archaeological site: mortars	1953
2768	2768	SR 20	Prehistoric archaeological site: subsurface midden deposits	2000

SOURCE: SCCIC 2023

Other Research

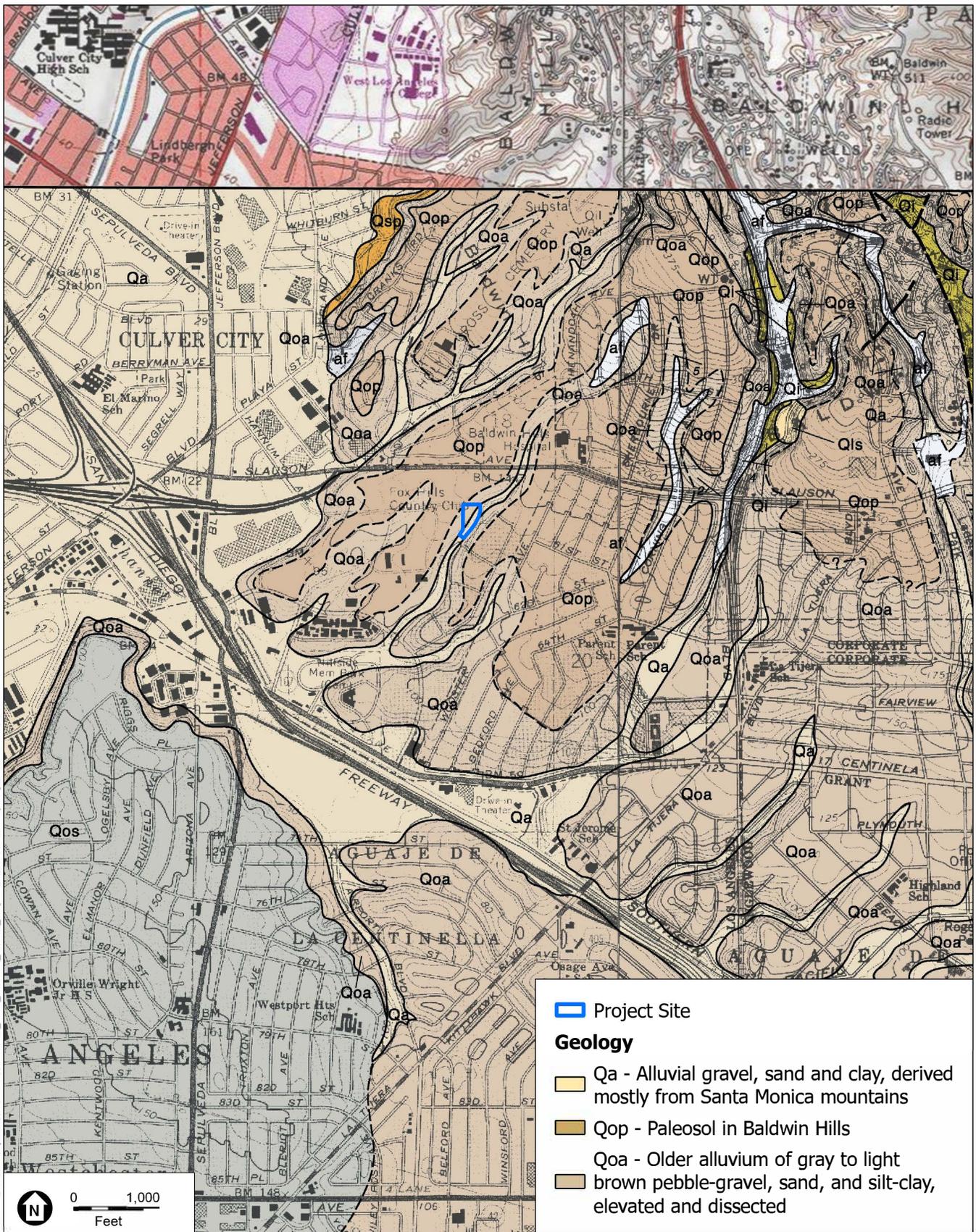
Additional archaeological resources (the report for which has not yet been archived at the CHRIS-SCCIC, as it is still in progress) were identified during ground disturbing activities in connection with a development project in Downtown Culver City (ESA 2022). These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. This property had a similar land use history as the Project Site.

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on July 11, 2023, to request a search of the SLF. The NAHC responded to the request in a letter dated August 11, 2023, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area (**Appendix B**). The City is conducting consultation with appropriate tribes per AB 52 and the results of this consultation will be summarized in the Tribal Cultural Resources Section of the Draft EIR.

Geologic Map and Geotechnical Report Review

There is disagreement over the geologic mapping of the Project Site by geologists. Poland et al. (1959) show the Project Site geology as the San Pedro Sand Formation from the lower or early Pleistocene. This geologic unit is a nearshore marine deposit. Dibblee and Minch (2007) map the Project Site as Qop (Fox Hills paleosol), Qoa (older alluvium) and Qa (Holocene-age alluvium) (**Figure 4**). Qa is surficial alluvium of Holocene age, “derived mostly from Santa Monica Mountains”. Dibblee and Minch (2007) assign a late Pleistocene age to the Qoa and the Qop. Geotechnologies, Inc. (2022) reproduced the mapping of Poland et al. (1959) but describe the soils in the northern portion of the Project Site as (marine) terrace deposits. That could be compatible with the San Pedro Sand Formation. Geotechnologies, Inc. (2022) also mention that during geotechnical exploration (consisting of placing two borings within the Project Site; one in the northern portion and another in the southern portion), fill materials were encountered from the surface down to depths of 1 and 3 feet bgs. Under the fill soils, marine terrace deposits (as mentioned above) were found, followed by bedrock (siltstone).



SOURCE: Topoquad Venice, 1982; ESRI, 2022; ESA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4
Geologic Map



Subsurface Sensitivity Assessment

Prehistoric Archaeological Analysis

Results of the records search have indicated that although no resources have been recorded within the Project Site or 0.50-mile radius, a total of six prehistoric archaeological resources (including village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc.) have been recorded in the immediate vicinity of the 0.50-mile radius. Review of historic maps indicate that Centinela Creek and Ballona Creek are located in the vicinity of the Project Site, which would have attracted prehistoric inhabitants to the area since they would have provided them with fresh water sources, along with floral and faunal resources. Additionally, two Native American villages (*Saa'anga* and *Waachnga*) are situated in the vicinity of the Project Site. The Geotechnical Report review indicates that fill soils (likely brought in during construction of the golf course and/or the existing building) occur within the Project Site from surface down to depths of 1 and 3 feet bgs, followed by older sediments consisting of marine terrace deposits and then bedrock. In cases where later development does disturb native sediments, prehistoric archaeological materials can become intermixed within historic fill such as in the case with the two prehistoric metate artifacts encountered during monitoring (in the upper six feet of disturbed fill sediments) in connection with a development project in Downtown Culver City that had similar existing uses as the Project Site. For these reasons, there is at least a *moderate to high* potential for prehistoric archaeological materials to be encountered as a result of Project-related ground-disturbing activities.

Historical Archaeological Analysis

Review of historic maps and aerial photographs indicate that the Project Site was undeveloped until a golf course was constructed in the Project Site by at least 1938. The existing building was also developed by at least 1983. Based on the lack of previous historic uses within the Project Site and the fact that no historic-period archaeological resources have been previously recorded within the Project Site or 0.50-mile radius, the potential to encounter historic-period archaeological resources within the Project Site is considered *low*.

Summary of Results and Recommended Mitigation Measures

The archaeological sensitivity assessment has indicated that the potential for encountering prehistoric archaeological resources is moderate to high and historic archaeological resources is low across the Project Site. Therefore, impacts to previously unknown buried archaeological resources would be potentially significant, and the following mitigation measures are provided in order to reduce impacts to archaeological resources to a less-than-significant level under CEQA.

- Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as site demolition (e.g., building footings/foundations, subsurface utilities, surface parking lots, sidewalks, etc.), clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving

of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.

- Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work within the buffer area shall only be allowed to continue after the evaluation and recovery efforts are completed. Work shall be allowed to continue outside of the buffer area.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Culver City (City) to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall also include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist, the Applicant may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Qualified Archaeologist; (2) require the recommendation, as modified by the City, be implemented in a manner that is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to

mitigate a potentially significant impact; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts. The Applicant shall pay all costs and fees associated with the mediator.

- The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

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Appendix A

Personnel



Kyle Garcia, M.A., RPA

Principal Archaeologist

EDUCATION

M.A., Anthropology
(Archaeology Option),
California State
University Los Angeles,

B.A., Anthropology,
(Physical/ Biological
Emphasis), University of
California, Santa
Barbara

17 YEARS EXPERIENCE

CERTIFICATIONS/ REGISTRATION

Register of Professional
Archaeologists

Riverside County
Registered Archaeologist
and Paleontologist

Orange County-Certified
Archaeologist and
Paleontologist

40-Hour HAZWOPER
Training – Update, 2019

PROFESSIONAL AFFILIATIONS

Society for American
Archaeology

Society for California
Archaeology

Pacific Coast
Archaeological Society

Kyle Garcia has 17 years of experience in the archaeology and prehistory of southern California, with a specialization in faunal analysis. During his career, he has authored or contributed to more than 600 projects subject to the requirements of the California Environmental Quality Act, the National Environmental Policy Act (NEPA), and regulations implementing Section 106 of the National Historic Preservation Act (Section 106 of the NHPA). He is well-versed in the archaeological resources of California's coastal, interior, and island settings. He is skilled in evaluation historic and prehistoric archaeological resources; agency and Native American consultation; pedestrian surveys, testing and evaluation excavations as well as archaeological and paleontological construction monitoring, and laboratory processing. During his tenure, he has authored or contributed to more than 500 technical reports and sections to support all levels of CEQA and NEPA documents. Kyle's portfolio of projects includes energy, water, and transportation infrastructure as well as residential, commercial, mixed-use, institutional, and urban redevelopment serving public and private sector clients. Kyle has conducted archaeological work throughout California and is a certified archaeologist and paleontologist in Riverside and Orange counties.

Representative Experience

Archaeological/Paleontological Monitoring. Kyle has managed more than 80 archaeological and/or paleontological construction monitoring projects in Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. His recent monitoring experience in Culver City for mixed-use development projects include Ivy Station, Culver Studios (9336 Washington Blvd), 8888 Washington Blvd, and 8777 Washington Blvd projects. His recent monitoring experience in the City of Los Angeles for mixed-use development projects include the Park Fifth Apartments (437 Hill St), Essex Hollywood (6250 Sunset Blvd), 6th and Virgil Project, 1500 Figueroa, 1340 Figueroa, and 10000 Santa Monica Blvd.

Paleontology. In addition to his archaeological work, Kyle has been cross-trained in paleontological mitigation monitoring and assisted in the excavations of a Miocene whale fossil near Irvine and a new species of extinct tuna in Laguna Niguel, California. Kyle has also managed or conducted more than 200 paleontological assessments and 40 paleontological monitoring projects throughout southern California. He has assisted ESA's paleontologists with the preparation of paleontological reports in compliance with CEQA and local paleontological guidelines, including guidelines for the Society for Vertebrate Paleontology.

Large-Scale Development Projects. Kyle directed the 1,400-acre field survey and the successful site recordation of over 150 prehistoric and historic archaeological resources per the Section 106 Process for a confidential project in

Riverside County; served as the Deputy Project Manager for the 240-acre Archaeological Treatment & Restoration Plan for The Cove project that was subject to Section 106, responsible for the field survey, Native American consultation, final report, and supervised the thorough recordation and documentation of over 350 significant artifacts. In Arizona, he led crews on a pedestrian survey and site recordation of more than 200 historic and prehistoric archaeological resources during a Class III Inventory on an 11,000-acre portion of the La Osa Ranch Project site in Pinal County.

Water Infrastructure. Kyle has performed the archaeological and paleontological resources surveys and assessments for a number of regional water infrastructure projects including the Reservoir No. 1 Reconstruction Project MND for Burbank; the Pasadena Groundwater Storage Program; and recycled water facilities projects for San Clemente, Pasadena, the Town of Rosamond, and Palmdale.

Transportation Infrastructure. Kyle is often sought after to conduct Peer Review services of controversial projects across southern California including the Needles Highway Safety Realignment Project for the County of San Bernardino, various infrastructure projects for Caltrans/San Bernardino Associated Governments, and the I-710 Corridor Project Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the City of Commerce.

In addition to road projects, Kyle has provided archaeological and paleontological services—cultural resources assessments and monitoring—on and around the Los Angeles International Airport (LAX). Among these include the cultural resources assessment of the proposed concrete pad/apron area and staging area within the southwest portion of LAX, known as the Southwest Remain Overnight Apron Project/West Aircraft Maintenance Area Project. He was also the ESA PCR cultural resources task manager for the EIR and Archaeological/Paleontological Monitoring for the LAX Central Utility Plant Replacement Project. Finally, Kyle was the PCR project manager for the archaeological and paleontological monitoring services during earthmoving operations associated with the development of the Crossfield Taxiway project. Monitoring was in compliance with the mitigation measures outlined in the Master Plan EIS/EIR pursuant to CEQA, NEPA, and Section 106.

Energy Projects. Kyle is well-versed in the potential effects of energy production projects on Southern California Archaeology through his service as an on-call consultant to Southern California Edison (SCE), where he has served as the Project Director and Manager for over 100 SCE projects and managed SCE purchase order contracts in excess of \$1.5 million. These projects were subject to requirements of CEQA, Section 106 of the NHPA, and other local ordinances. These projects included deteriorated pole replacements, conduit and vault installations, and distribution circuit installations (aboveground and underground) located throughout SCE's service area in Central and Southern California. Kyle not only managed the budgets and supervised the work for these projects but also conducted most of the record searches, surveys, report writing, site recordation, and client/agency coordination for these projects. In addition to his SCE work, Kyle was the project manager for a 150-acre ground-mounted solar



power project in San Bernardino County and assisted with a 245-acre confidential petroleum exploration project on California's Central Coast.

Education Facilities. Kyle's academic experience includes conducting cultural and paleontological records searches in support of an Initial Study/MND for the proposed John Thomas Dye School Improvement project in the Bel Air Community of the city of Los Angeles; the Long Beach Unified School District's District-Wide Cultural Resources Assessment; and the University High School Beautification project. In addition, Kyle has supervised ESA PCR staff paleontologists during paleontological monitoring services for the Stephen S. Wise Middle School Relocation project in the city of Los Angeles; he also supervised the subsequent fossil identification/analysis and final report preparation services for this project. These services have been conducted pursuant to a Mitigation Monitoring and Reporting Program that was established to implement the mitigation measures identified in the EIR for the project.

Cultural Resources Sensitivity Training. He is well-versed in conducting Cultural Resources Sensitivity Training Sessions to government staff, applicants, contractors, engineers, and construction personnel with regard to the procedures to implement in the event that archaeological or paleontological resources are encountered during construction.

Geographic Information Systems. Kyle has also gained valuable experience with recording historic and prehistoric archaeological sites with Garmin, Magellan, and sub-meter Trimble GeoXT Global Positioning System (GPS) units. He has worked with GIS software such as ArcPad, ArcGIS, and ArcView and developed methods for using these products to accurately and efficiently record archaeological sites.

Presentations. Kyle presented a paper at the 72nd Annual Meeting for the Society of American Archaeology Conference in Austin, Texas in 2007. The paper focused on prehistoric 'yoni' features encountered on a project site proposed to be developed in western Riverside County, California. The project was subject to requirements of CEQA and Section 106 of the NHPA. Kyle has also presented a poster at the Society of California Archaeology Conference in Fish Camp, California in 2016 titled *Urban Archaeology Strikes Again! - 250 Years of Los Angeles History and Archaeology Uncovered in One Downtown City Block*. Kyle also presented a paper on historic archaeology and CEQA at a 2015 workshop for the California Preservation Foundation in Los Angeles.



Fatima Clark

Archaeologist

EDUCATION

BA, Anthropology,
California State
University, Fullerton

12 YEARS OF EXPERIENCE

PROFESSIONAL AFFILIATIONS

Society for California
Archaeology

SPECIALIZED TRAINING

Section 106 Webinar,
2016

Workshop: The Art and
Science of Flintknapping,
California Desert Studies
Center, 2013

Successful CEQA,
Compliance-Southern
California Edison,
Environmental Training,
2011

Cultural Resources
Protection under CEQA
and Other Legislative
Mandates, UCLA
Extension, 2010

CERTIFICATIONS/ REGISTRATION

Orange County Certified
Archaeologist

Fatima has 12 years of hands-on archaeological experience and is practiced in project management and client and agency coordination. Her field experience is complimented by the course study and participation in numerous archaeological excavations in California, Arizona, and Peru. Fatima has written California Environmental Quality Act (CEQA)-level technical reports, Environmental Impact Report (EIR) sections, Initial Study sections, archaeological peer reviews, archaeological monitoring reports, and reports pursuant to California Department of Transportation (Caltrans) requirements. She is also experienced in performing archaeological testing, site recordation, laboratory analysis, pedestrian surveys, records searches through several California Historical Resources Information Systems-Information Centers, and monitoring for a wide variety of projects, including mixed-use, residential, and energy, water, and road infrastructure projects. In addition to her archaeology background, Fatima has been cross-trained in conducting paleontological surveys and monitoring and has co-authored and managed associated reports.

Relevant Experience

Hillcrest Real Estate, LLC., Universal Hilton City, Universal City, CA (2020).

Archaeologist. Fatima was in charge of preparing the Cultural Resources Assessment and EIR section for the project pertaining to CEQA. Fatima also coordinated the preparation of the Paleontological Resources Assessment. The project will include a new 20-story Hotel Expansion Building (with 395 guest rooms and a spa limited to guests and 250 non-guest members) with a new single-level lobby connecting to the Existing Hotel Building. The Project is located near the entrance of Universal Studios.

Irvine Ranch Water District, Syphon Reservoir Improvement Project, Orange County, CA (2019-2020).

Archaeological/Paleontological Monitor. The Final Initial Study/Mitigated Negative Declaration concluded that the Project Site was sensitive for archaeological resources (due to the existence of several prehistoric archaeological sites within the Project Site) and paleontological resources [due to the geologic units within the Project Site having high paleontological potential (Silverado, Sespe/Vaqueros Formations)]. Fatima conducted the archaeological and paleontological monitoring for the project and was the main author of the monitoring report. The project proposed geotechnical explorations consisting of exploratory test pits, borings, abutment trenches, and a seismic trench at the Syphon Reservoir to characterize the subsurface conditions of the soil.

Irvine Ranch Water District, Syphon Reservoir Improvement Project, Orange County, CA (2018-2019).

Archaeologist. Fatima was in charge of conducting archival research, pedestrian survey, and served as one of the lead author of the Cultural Resources Assessment Report, pursuant to CEQA and Section 106. The

survey for the study led to the relocation of two previously recorded prehistoric archaeological sites and the recordation of five additional resources, including one prehistoric isolate, one historic-period archaeological resource, and three historic architectural resources.

March Joint Powers Authority, Heacock Street Truck Terminal Project, (2019-2020). *Archaeological/Paleontological Monitor.* Fatima conducted archaeological and paleontological monitoring for the project and the preparation of the monitoring report. The project would consist of the construction of a paved trucking facility.

Miramar Hotel Redevelopment EIR, Santa Monica, CA (2019). *Archaeologist.* Fatima was in charge of conducting archival research and preparing the Phase I Archaeological Resources Assessment for the project pertaining to CEQA. Fatima also coordinated the preparation of the Paleontological Resources Assessment. The project includes adaptive reuse of the historic Palisades Building and replacement of other buildings in order to provide a mixed-use luxury hotel with new food and beverage facilities, open space, spa, meeting facilities, and retail space, along with residential units on the upper floors of the new buildings.

Oaks at Monte Nido, Santa Monica Mountains, Unincorporated Los Angeles County, CA (2019-2020). *Archaeologist.* Fatima was in charge of conducting archival research, the archaeological and paleontological pedestrian survey, the preparation of the Phase I Archaeological Resources Assessment pertaining to CEQA, and assisted with the preparation of Paleontological Resources Assessment. The pedestrian survey yielded the identification of a sandstone boulder that contains a fossil impression of the skull of a small-toothed cetacean “dolphin” and the identification of fossilized shells of pelecypods (e.g., bivalves such as clams, mussels, oysters, and cockles) and gastropods (e.g., snails and slugs). The project proposes the development of 15 single-family residences on separate individual recorded parcels within the Monte Nido Community, along the scenic route of Piuma Road.

California Department of Water Resources, Soil Removal at Southern Field Division Overchute, Los Angeles County (2019). *Archaeologist.* Fatima assisted with the archival research and served as a contributor to the Archaeological Resources Survey Report. The project would consist of removing soil and sand around an overchute near Mile Marker (MM) 375.46.

11469 Jefferson Hotel Project, Culver City, CA (2019). *Archaeologist.* Fatima was in charge of conducting the archival research, survey, and subsurface sensitivity assessment for archaeological resources. The project is within an area of archaeological sensitivity, and the study identified those areas with a higher likelihood to contain subsurface resources based on a review of environmental, geologic, and historic data. The project would develop a five-story, 175-room boutique hotel with below-grade parking, and would require demolition of existing commercial structures.

Cross Creek, City of Malibu, CA (2019). Fatima was in charge of conducting archival research, the archaeological pedestrian survey, the preparation of the Phase I Archaeological Resources Assessment. The project would include the construction of a hospitality facility on the approximately 12.82-acre Project Site.



Los Angeles Unified School District, San Pedro High School Comprehensive Modernization Project, Los Angeles, CA (2017-2018). *Archaeologist.* Fatima was the lead author for the Archaeological and Paleontological Resources report for the project pursuant to CEQA. The project is a site-specific school upgrade and modernization project being completed by the Los Angeles Unified School District under the School Upgrade Program. In addition to writing the report, Fatima was also the lead preparer of the Cultural Resources section of the EIR.

Los Angeles Unified School District, Burroughs Middle School Comprehensive Modernization Project, Los Angeles, CA (2018). *Archaeologist.* Fatima was the lead author for the Archaeological and Paleontological Resources report for the project pursuant to CEQA. The project would include: demolition of the Shop Building, Cafeteria/classroom buildings, and approximately 14 classrooms located in portable (relocatable) buildings; and construction of approximately 34 general and specialty classrooms, support spaces, and a new Food Services Building and Lunch Shelter. The proposed project would also include modernization and seismic retrofits to the Administration/auditorium Building, the Classroom Building, and the Gymnasium Building.

Orange County Sanitation District, Headworks Rehabilitation and Expansion Project (Project No. P1-105), Fountain Valley, CA (2018). *Archaeologist.* Fatima was in charge of preparing the Cultural Resources section of the Initial Study/Mitigated Negative Declaration for the project. The Orange County Sanitation District (OCSD) proposes to implement the Headworks Rehabilitation and Expansion Project at OCSD's Plant 1 wastewater treatment facility located in Fountain Valley, California. The proposed Project includes rehabilitation, demolition, and new construction of headworks structures at Plant 1.

Santa Margarita Water District, San Juan Watershed Project, San Juan Capistrano and Dana Point, CA (2017). *Archaeologist.* Fatima was the lead author for the Phase I Cultural Resources Studies for the project compliant with CEQA and Section 106 of the National Historic Preservation Act. Besides being the lead author for the report, Fatima conducted the records searches, pedestrian survey, prepared the Cultural Resources section of the EIR, and conducted coordination with the Orange County Flood Control District in order to acquire an encroachment permit to conduct the pedestrian survey. The project is to be constructed in multiple phases. The first phase (Phase I) would include installation of three rubber dams and control buildings within San Juan Creek. Subsequent phases include additional dams within San Juan Creek and Arroyo Trabuco, recycled water recharge facilities, and additional upgrades to existing groundwater recovery facilities.

Appendix B
Sacred Lands File Search

NATIVE AMERICAN HERITAGE COMMISSION

August 11, 2023

Fatima Clark
ESA

Via Email to: fclark@esassoc.com

Re: 5700 Hannum Project, Los Angeles County

Dear Ms. Clark:

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

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

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment



CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan

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(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

**Native American Heritage Commission
Native American Contact List
Los Angeles County
8/11/2023**

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(626) 926-4131		chairman@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/2/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(626) 926-4131		admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/2/2023
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	(626) 286-1262	GTTRibalcouncil@aol.com	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Ventura	
Gabrielino /Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Ventura	3/28/2023
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761		christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351		tongvatcr@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Ventura	5/30/2023
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		Chavez1956metro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Ventura	5/30/2023
Santa Rosa Band of Cahuilla Indians	F	Lovina Redner, Tribal Chair	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	lsaul@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed 5700 Hannum Project, Los Angeles County.

Record: PROJ-2023-003989
Report Type: List of Tribes
Counties: Los Angeles
NAHC Group: All