

December 1, 2015



Mr. Thomas W. Wulf, Senior Vice President  
**LOWE ENTERPRISES REAL ESTATE GROUP**  
11777 San Vicente Boulevard, Suite 900  
Los Angeles, CA 90049

**Re: PHASE I ARCHAEOLOGICAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT  
FOR THE PROPOSED IVY STATION PROJECT; CULVER CITY AND CITY OF LOS  
ANGELES, CALIFORNIA**

Dear Mr. Wulf:

This letter presents the results of an archaeological and paleontological resources assessment conducted by **PCR Services Corporation (PCR)** for the above-referenced project.

**PROJECT DESCRIPTION AND SCOPE OF STUDY**

Lowе Enterprises Real Estate Group (the Applicant) proposes to redevelop a 5.52-acre triangular-shaped property (Project Site) located in Culver City and the City of Los Angeles (**Figure 1, Regional Map**, attached). The Project Site is also located immediately adjacent to the Los Angeles Metropolitan Transportation Authority (Metro) Exposition (Expo) Line and Culver City Station (Culver City Metro Station or Metro Station). The proposed transit oriented development (TOD) project (Ivy Station or the project) would include a mix of office, retail, restaurant, residential and hotel uses. The project would include a stand-alone 5-story office building (the Office Building) with retail and restaurant uses on the ground floor. In addition, two interconnected 5 and 6-story buildings would be developed atop a single podium. The buildings would include, a 200-unit residential building (the Residential Building) and a 148-room boutique hotel (the Hotel Building). A mix of retail and restaurant uses would also be provided on the ground level within these buildings. Parking for all of the proposed uses would be provided on-site within the ground-level podium and two-and-a-half levels of subterranean parking, which would also provide parking for users of the adjacent Metro Station. All three proposed buildings would be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels.

In September 2015, PCR conducted a Phase I archaeological and paleontological resources assessment of the proposed project to determine the potential impacts to archaeological and paleontological resources associated with the proposed project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included a cultural resources records search through the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC), Sanborn map review, a paleontological resources records search through the Natural History Museum of Los Angeles County (NHMLAC), a Sacred Lands File (SLF) search through the California Native American



Heritage Commission (NAHC) and follow-up Native American consultation. As the Project Site is currently developed with buildings and a paved surface parking lot, a pedestrian survey for the Project Site was not conducted.

## **PROJECT LOCATION**

The Project Site is located in an unsectioned portion of Township 2 South, Range 14 West of the Beverly Hills, California United States Geologic Survey 7.5' topographic quadrangle map (**Figure 2, Location Map**, attached). The Project Site is located south of the intersection of Venice Boulevard and National Boulevard in a densely urbanized area of Culver City and the City of Los Angeles (**Figure 3, Aerial Photograph**, attached).

## **CULTURAL SETTING**

### **Prehistoric Background**

Prehistory is most easily discussed chronologically, in terms of environmental change and recognized cultural developments. Several chronologies have been proposed for inland Southern California, the most widely accepted of which is Wallace's four-part Horizon format (1955), which was later updated and revised by Claude Warren (1968). The advantages and weaknesses of Southern California chronological sequences are reviewed by Warren (in Moratto 1984), Chartkoff and Chartkoff (1984), and Heizer (1978). The following discussion is based on Warren's (1968) sequence, but the time frames have been adjusted to reflect more recent archaeological findings, interpretations, and advances in radiocarbon dating.

Little is known of Paleoindian peoples in inland southern California, and the cultural history of this period follows that of North America in general. Recent discoveries in the Americas have challenged the theory that the first Americans migrated from Siberia, following a route from the Bering Strait into Canada and the Northwest Coast some time after the Wisconsin Ice Sheet receded (ca. 14,000 YBP), and before the Bering Land Bridge was submerged (ca. 12,000 YBP). A coastal migration route somewhat before that time is also possible. The timing, manner, and location of this crossing are a matter of debate among archaeologists, but the initial migration probably occurred as the Laurentide Ice Sheet melted along the Alaskan Coast and interior Yukon. The earliest radiocarbon dates from the Paleoindian Period in North America come from the Arlington Springs Woman site on Santa Rosa Island. These human remains date to approximately 13,000 YBP (Johnson et al. 2002). Other early Paleoindian sites include the Monte Verde Creek site in Chile (Meltzer et al. 1997) and the controversial Meadowcroft Rockshelter in Pennsylvania. Both sites have early levels dated roughly at 12,000 YBP. Lifeways during the Paleoindian Period were characterized by highly mobile hunting and gathering. Prey included megafauna such as mammoth and technology included a distinctive flaked stone toolkit that has been identified across much of North America and into Central America. They likely used some plant foods, but the



Paleoindian toolkit recovered archaeologically does not include many tools that can be identified as designed specifically for plant processing.

The megafauna that appear to have been the focus of Paleoindian lifeways went extinct during a warming trend that began approximately 10,000 years ago, and both the extinction and climatic change (which included warmer temperatures in desert valleys and reduced precipitation in mountain areas) were factors in widespread cultural change. Subsistence and social practices continued to be organized around hunting and gathering, but the resource base was expanded to include a wider range of plant and game resources. Technological traditions also became more localized and included tools specifically for the processing of plants and other materials. This constellation of characteristics has been given the name "Archaic" and it was the most enduring of cultural adaptations to the North American environment.

The earliest Archaic Period lifeways in inland southern California have been given the name San Dieguito tradition, after the San Diego area where it was first identified and studied (Warren 1968). Characteristic artifacts include stemmed projectile points, crescents and leaf-shaped knives, which suggest a continued subsistence focus on large game, although not megafauna of the earlier Paleoindian period. Milling equipment appears in the archaeological record at approximately 7,500 years ago (Moratto 1984:158). Artifact assemblages with this equipment include basin millingsstones and unshaped manos, projectile points, flexed burials under cairns, and cogged stones, and have been given the name La Jolla Complex (7,500–3,000 YBP). The transition from San Dieguito lifeways to La Jolla lifeways appears to have been an adaptation to drying of the climate after 8,000 YBP, which may have stimulated movements of desert peoples to the coastal regions, bringing millingsstone technology with them. Groups in the coastal regions focused on mollusks, while inland groups relied on wild-seed gathering and acorn collecting.

Cultural responses to environmental changes around 4,000–3,000 YBP included a shift to more land-based gathering practices. This period was characterized by the increasing importance of acorn processing, which supplemented the resources from hunting and gathering. Meighan (1954) identified the period after a.d. 1400 as the San Luis Rey complex. San Luis Rey I (a.d. 1400–1750) is associated with bedrock mortars and millingsstones, cremations, small triangular projectile points with concave bases and Olivella beads. The San Luis Rey II (a.d. 1750–1850) period is marked by the addition of pottery, red and black pictographs, cremation urns, steatite arrow straighteners and non-aboriginal materials (Meighan 1954:223, Keller and McCarthy 1989:6). Work at Cole Canyon and other sites in Southern California suggests that this complex, and the ethnographically described life ways of the native people of the region, were well established by at least 1,000 YBP (Keller and McCarthy 1989:80).



## **Ethnographic Context – The Gabrielino**

The Project area lies in the territory once occupied by the Gabrielino. The Gabrielino were one of the most populous ethnic nationalities of aboriginal southern California. Gabrielino territory included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south to Topanga Canyon in the north, the four southern Channel Islands, and watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. Their name is derived from their association with Mission San Gabriel Archangel.

The Gabrielino arrived around 500 B.C. and their language has been identified as a Cupan language within the Takic family, which is part of the larger Uto-Aztecan language family. Uto-Aztecan speakers arrived in southern California in what is known as the Shoshonean migration, which current archaeological and linguistic evidence suggests originated in of the Great Basin and displaced the already established Hokan speakers. The Gabrielino were advanced in their culture, social organization, religious beliefs, and art and material production. Class differentiation, inherited chieftainship, and intervillage alliances were all components of Gabrielino society. At the time of European contact, the Gabrielino were actively involved in trade using shell and beads as currency. The Gabrielino were known for excellent artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. The Gabrielinos evolved an effective economic system which managed food reserves (storage and processing), exchanged goods, and disturbed resources. Otherwise, few specifics are known of Gabrielino lifeways. Data collected and presented by Kroeber (1925) indicate that homes were made of tule mats on a framework of poles, but size and shape have not been recorded. Basketry and steatite vessels were used rather than ceramics; ceramics became common only toward the end of the mission period in the nineteenth century. The Gabrielino held some practices in common with other groups in southern California, such as the use of jimsonweed in ceremonies as did the neighboring Luiseño and Juaneño, but details of the practices and the nature of cultural interaction between the Gabrielino and other groups in southern California are unknown.

## **METHODS**

### **Cultural Resources Record Search**

On July 2, 2015, PCR archaeologist, Fatima Clark, conducted a cultural resource records search at the CHRIS-SCCIC at the California State University, Fullerton. This records search included a review of all recorded historical resources and archaeological sites within a half-mile radius of the Project Site as well as a review of cultural resource reports and historic topographic maps on file. In addition, PCR reviewed the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register of Historic Places (California Register), the National Register of Historic Places (National Register), and the California State Historic Resources Inventory listings (HRI). The purpose of the records search is to determine whether or not there are previously recorded archaeological or historical



resources within the Project Site that require evaluation and inclusion in the impact analysis. The results also provide a basis for assessing the sensitivity of the Project Site for additional and buried resources.

PCR also reviewed Sanborn Fire Insurance Maps of the Project Site to understand the land use history of the project.

### **Sacred Lands File Search and Native American Consultation**

On July 7, 2015, PCR commissioned a SLF records search of the Project Site through the NAHC and conducted follow-up consultation with Native American groups and/or individuals identified by the NAHC as having affiliation with the project area vicinity. Each Native American group and/or individual listed was sent a project notification letter and map and was asked to convey any Native American issues or concerns with the proposed project. The letter included information such as Project Site location and a brief description of the proposed development. Results of the search and follow-up consultation will provide information as to the nature and location of additional prehistoric or Native American resources to be incorporated in the impact analysis whose records may not be available at the CHRIS-SCCIC.

### **Paleontological Resources Record Search**

On July 7, 2015, PCR commissioned a paleontological resources records search through the Natural History Museum of Los Angeles County (NHMLAC). This records search entailed an examination of current geologic maps and known fossil localities inside and within the general vicinity of the Project Site. The purpose of the records search is to determine whether or not there are previously recorded paleontological resources or fossiliferous geological formations within the Project area that require evaluation and inclusion in the impact analysis. The results also provide a basis for assessing the sensitivity of the Project Site for additional and buried resources.

## **RESULTS**

### **Cultural Resources Record Search**

Results of the cultural resources records search indicate that the Project Site has not been surveyed by a qualified archaeologist and no known historic and prehistoric archaeological resources from the SCCIC records have been recorded within the project site boundaries or within a half-mile radius. Ten cultural resource investigations have been conducted within the one-half mile radius. Of the ten studies, six were conducted immediately adjacent to the Project Site.



Review of the 1924 Sanborn Fire Insurance Map shows that the Project Site was an undeveloped triangular shaped block bounded by Venice Boulevard, National Boulevard, and Winship Avenue (Exposition Boulevard). Running parallel to Winship Avenue (Exposition Boulevard) was the Pacific Electric Right of Way improved with the Montgomery Lumber Company. The next Sanborn Map available from 1929 shows the same conditions; however, three buildings were developed (later demolished) at the southeast corner of the block at the intersection of National Boulevard and Exposition Boulevard that included a tile warehouse, auto repair shop, and gas station. Review of the 1950 Sanborn Fire Insurance Map indicates that, by 1950, nearly the entire project site was developed with commercial, industrial, and residential uses. For instance, the southwestern portion of the project site (corner of Robertson Blvd. and Venice Blvd.) is depicted as being developed with a one-story office building while the southern portion (immediately north of the current Culver City Station), is also shown as being developed with a building material warehouse, lumber racks yard, sash and doors building, lime and cement yard, a lumber shed, roofing and panels building, and a "Some Paint" office building. The 1950 Sanborn map also exhibits Exposition Blvd. as cutting across the middle portion of the project site and along an east-west axis. Just north of the old Exposition Blvd., the 1950 Sanborn map depicts five one-story dwellings with a large parking garage, seven one-story dwellings with two small parking garages, four one-story dwellings with two small parking garages, one large story dwelling with a walkway and detached building (possibly a private garage), a "Paint" building, a lamp manufacturing building, a metal and woodworking shop, and a "Bindery Leather Work'g" building. Along Venice Blvd., a clothing manufacturing building, a driveway, a one-story store, a one-story structure, a two-story store and two small associated buildings, a one-story store, an office and "Watchmans Tool Mfg" plant, and a gas and oil station are also depicted on the Sanborn map. Lastly, along National Blvd., a one-story office building, a one-story dwelling, a plumbing equipment manufacturing plant, a cabinet shop, a sheet metal products manufacturing plant, a dry cleaning equipment manufacturing plant, a machinery shop, an auto repair shop, and a gas and oil station are depicted also shown as having existed within the project site.

### **Sacred Lands File Search and Native American Consultation**

The NAHC SLF records search results did not indicate the existence of known Native American cultural resources from the NAHC database within a one-half mile of the Project Site. As per NAHC suggested procedure, follow-up letters were sent via certified mail on July 19, 2015 and via email on July 20, 2015 to the nine Native American individuals and organizations identified by the NAHC as being affiliated with the vicinity of the project area to request any additional information or concerns they may have about Native American cultural resources that may be affected by the proposed project. On August 20, 2015, Mr. John Tommy Rosas, Tribal Administrator from the Tongva Ancestral Territorial Tribal Nation contacted PCR via email requesting specific project description, such as depths of excavation and permits needed by the project. On September 8, 2015, PCR replied to Mr. Rosas' questions via email and provided the contact information for the City planner to allow Mr. Rosas to coordinate with.



On October 14, 2015, Mr. Robert Dorame of the Gabrielino Tongva Indians, contacted PCR via phone and recommended Native American monitoring at the Project Site during ground disturbing activities, as he mentioned that “his lineal descendance” has close ties to the Project Site. Mr. Dorame specifically mentioned that his great grandmother lived less than a mile away and close to the Ballona Creek area. The Native American consultation documentation is provided as an attachment to this report.

### **Paleontological Resources Record Search**

Results of the record search at the NHMLAC revealed that no known vertebrate fossil localities have been recorded from the NHMLAC database within the Project Site, but that localities have been recorded in the vicinity in the same sedimentary deposits that underlie the Project Site. According to the NHMLAC, the Project Site contains younger Quaternary Alluvium deposits derived as fluvial deposits from Ballona Creek. Although these deposits typically do not contain vertebrate fossils in the uppermost layers, there are older Quaternary sediments in the area that have yielded paleontological resources. For instance, resource LACM 3368 produced a fossil horse while LACM 4250 produced a fossil mammoth—both resources were recovered at unknown depths. Moreover, LACM 4232 produced the remains of fossil human at a depth of 12 to 13 feet below the surface. These three localities (LACM 3368, 4250, and 4232) are located approximately one-half mile to three-quarters of a mile away from the Project Site. Additional vertebrate fossil localities (LACM 1159, LACM 3366, LACM 3367 and LACM 3369 and LACM 3370) have also been recorded between Crenshaw Boulevard and Ballona Creek (along the Southern Pacific Railway and Rodeo Road) approximately one- to three-miles from the Project Site, during excavations for the Outfall Sewer area in the 1920s. LACM 1159 yielded a fossil human at a depth between 19 to 23 feet below the surface. LACM 3366 (fossil camel), LACM 3367 (fossil mastodon), and LACM 3370 (sabretooth cat) were all recovered at unknown depths. Lastly, LACM 3369 produced a fossil horse at a depth of six feet below the surface. The record search results letter from the NHMLAC is provided as an attachment to this report.

## **IMPACT ANALYSES**

### **Archaeological Resources**

Results of the cultural resources records search indicated that the Project Site had not been previously surveyed by an archaeologist and no known archaeological resources have been recorded within the project site boundaries or within a half-mile radius. Review of the 1924, 1929 and 1950 Sanborn Fire Insurance Maps indicated that the Project Site was previously developed with residential, commercial, and industrial uses. Although these improvements were demolished sometime between 2007 and 2009 (per review of Google Earth aerial photography), it is possible that buried historic period archaeological deposits (e.g., refuse heaps, privies, foundations, cellars, etc.) associated with these uses may still exist below the ground surface of the Project Site. Therefore, construction excavations associated



with the project's proposed two-and-a-half levels of subterranean parking has the potential to impact these previously unknown archaeological resources at depth. As a result, Mitigation Measures CULT-1 to CULT-3 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

### **Paleontological Resources**

Results of the record search at the NHMLAC did not reveal the existence of known fossil localities within the Project Site, but localities have been recorded in the vicinity from the same sedimentary deposits that underlie the Project Site. These localities from older Quaternary deposits have yielded fossils of a horse, mammoth, humans, camel, mastodon, and sabretooth cat at unknown depths and depths between six and 23 feet below surface. Based on the rich paleontological findings near the Project Site and given that the proposed excavations for the subterranean parking will extend into fossiliferous native soils (i.e., older Quaternary alluvium), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. As a result, Mitigation Measures CULT-4 to CULT-6 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

### **Human Remains**

A SLF search from the NAHC failed to indicate the presence of Native American cultural resources from the NAHC archives within the Project Site or surrounding vicinity. Two of the nine Native American contacts replied to PCR's contact letters. However, only one of these contacts (Mr. Robert Dorame of the Gabrielino Tongva Indians) provided information with regards to the Project Site. Mr. Dorame indicated that "his lineal descendancy" has close ties to the Project Site and that his great grandmother lived less than a mile away and close to the Ballona Creek area. Since the Project Site is currently developed and no resources have been recorded within the Project Site, near the vicinity of the Project Site or within the one-half mile radius, the overall sensitivity for finding buried human remains appears to be low and; therefore, the Project would not disturb any known human remains, including those interred outside of formal cemeteries. However, in the unlikely event that human remains are unearthed during ground-disturbing activities, it is recommended that the Applicant implement mitigation measure CULT-7, as described in the following section, to reduce impacts to human remains that are unexpectedly discovered during project implementation to a less than significant level.





## **RECOMMENDED MITIGATION MEASURES**

The following mitigation measures have been recommended by PCR to reduce potentially significant impacts on buried and undiscovered archaeological resources, paleontological resources and human remains to a less than significant level pursuant to CEQA:

### **Archaeological Resources:**

**Mitigation Measure CULT-1:** The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be 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. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the archaeological monitor.

**Mitigation Measure CULT-2:** In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist. The Applicant shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. In preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated 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 archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.



**Mitigation Measure CULT-3:** The archaeological monitor 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. The report and the Site Forms shall be submitted by the Applicant to Culver City, the City of Los Angeles, 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.

### **Paleontological Resources**

**Mitigation Measure CULT-4:** A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary alluvium. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary alluvium. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor.

**Mitigation Measure CULT-5:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation. If preservation in place is not feasible, the



paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

**Mitigation Measure CULT-6:** The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

## **Human Remains**

**Mitigation Measure CULT-7:** If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. 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 shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not



damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Please contact us if you have any questions about the results and recommendations presented in this report.

Sincerely,

**PCR SERVICES CORPORATION**

A handwritten signature in black ink, appearing to read "Fatima Clark".

Fatima Clark  
Archaeologist

A handwritten signature in black ink, appearing to read "Kyle Garcia".

Kyle Garcia  
Senior Archaeologist I

Attachments



## REFERENCES

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Mr. Thomas W. Wulf, Senior Vice President  
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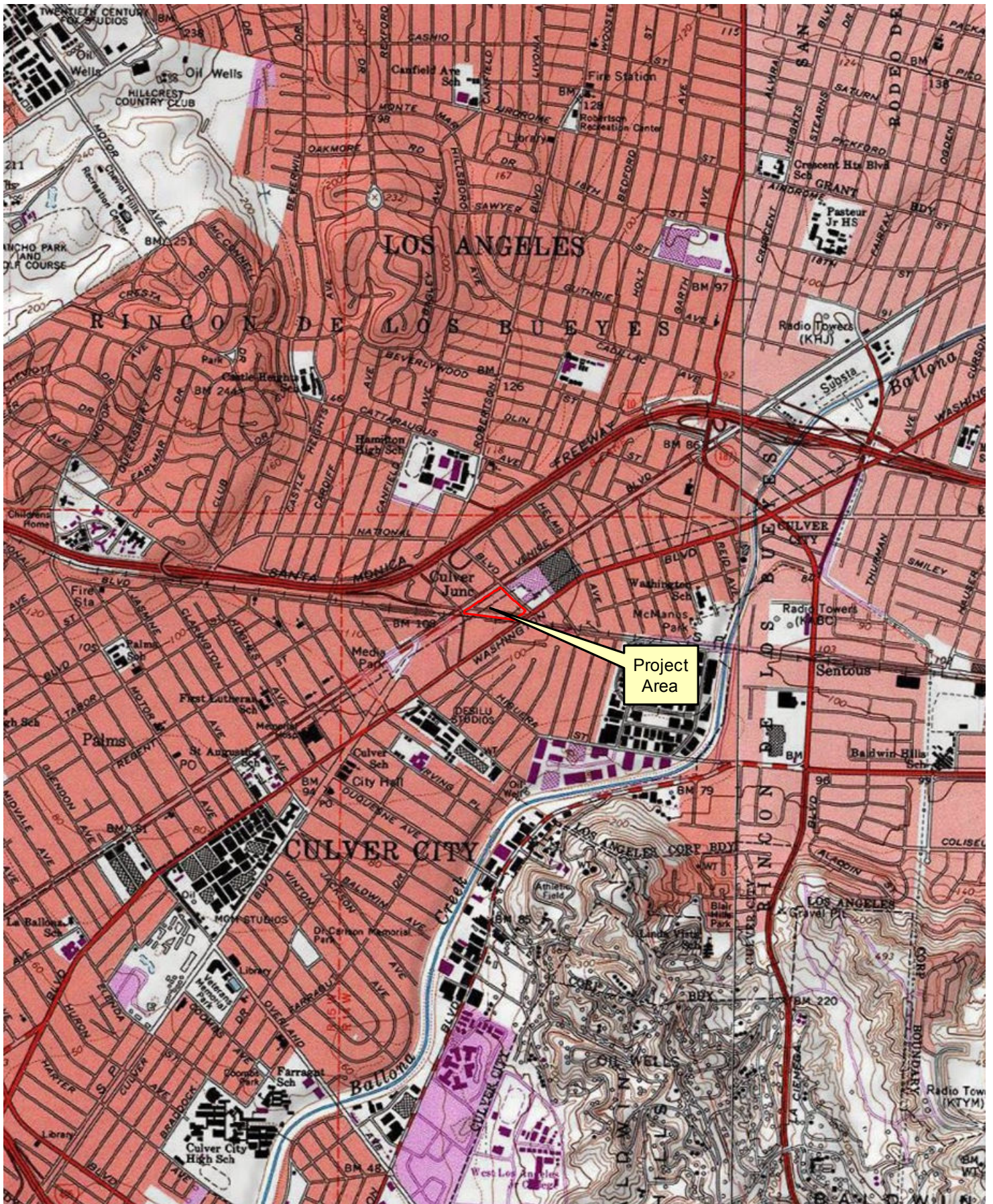
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0 2,000 Feet

0 600 Meters

### Location Map

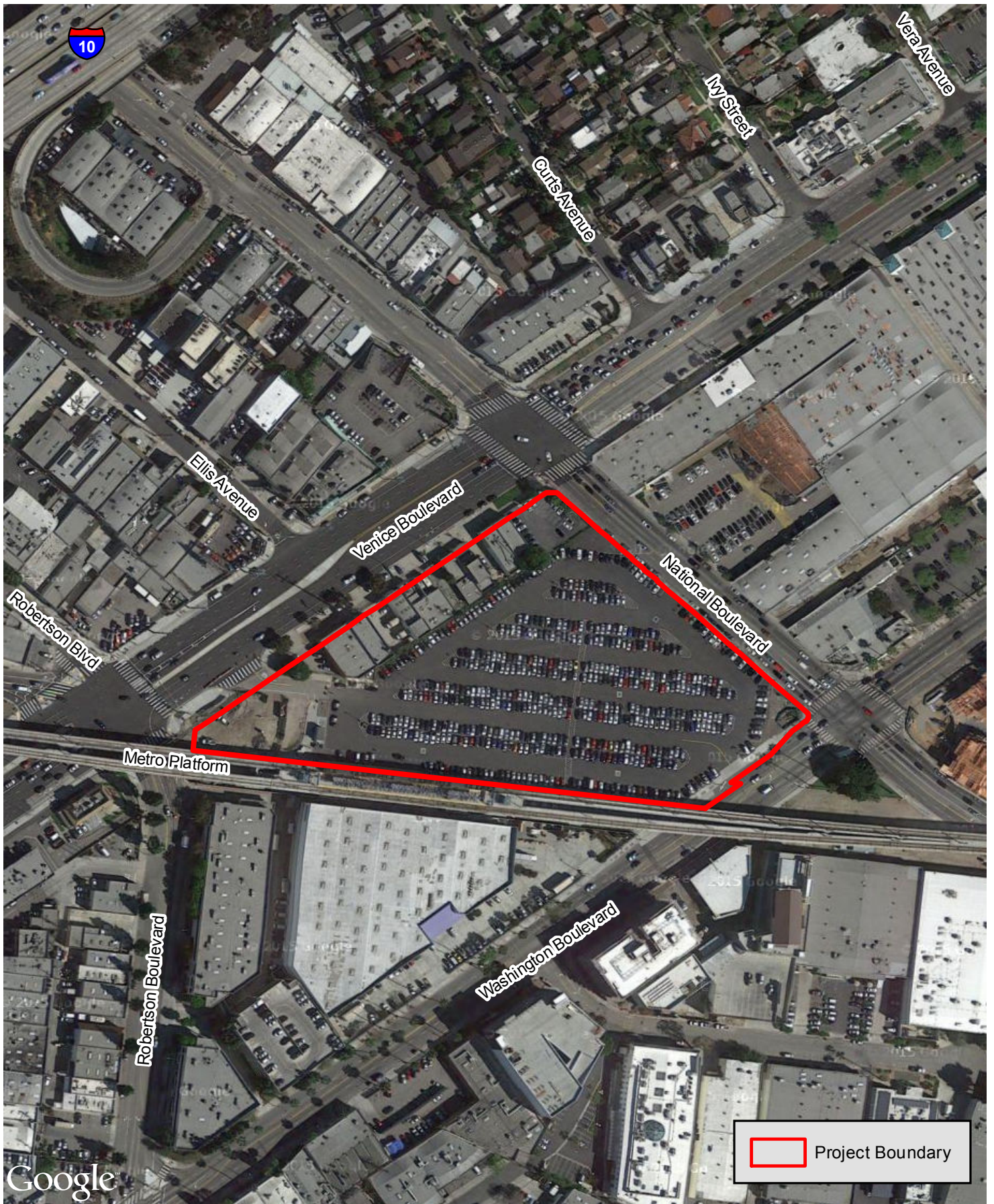
Ivy Station

Source: USGS Topographic Series (Beverly Hills, Hollywood, CA); PCR Services Corporation, 2015.

FIGURE

2





0 200 Feet

0 60 Meters

### Aerial Photograph

Ivy Station

Source: Google Earth, 2015-03-23 (Aerial); PCR Services Corporation, 2015.

FIGURE

3

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Blvd., ROOM 100  
West SACRAMENTO, CA 95691  
(916) 373-3710  
Fax (916) 373-5471



August 6, 2015

Fatima Clark  
PCR Services Corporation  
2121 Alton Parkway, Suite 100  
Irvine, CA 92606

Email to: [f.clark@pcrnet.com](mailto:f.clark@pcrnet.com)

RE: Washington National Mixed-Use Development Project, culver City, Los Angeles County.

Dear Ms. Clark,

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file 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.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. 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 or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 373-3712.

Sincerely,

A handwritten signature in black ink that reads "Katy Sanchez".

Katy Sanchez  
Associate Government Program Analyst

**Native American Contact List  
Los Angeles County  
August 6, 2015**

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Gabrielino Tongva  
tattnlaw@gmail.com  
(310) 570-6567

Gabrielino-Tongva Tribe  
Bernie Acuna, Co-Chairperson  
1999 Avenue of the Stars, Suite 1100 Gabrielino  
Los Angeles , CA 90067  
(310) 428-5690 Cell

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

Gabrielino-Tongva Tribe  
Linda Candelaria, Co-Chairperson  
1999 Avenue of the Stars, Suite 1100 Gabrielino  
Los Angeles , CA 90067  
(626) 676-1184 Cell

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

Gabrieleno Band of Mission Indians - Kizh Nation  
Andrew Salas, Chairperson  
P.O. Box 393 Gabrielino  
Covina , CA 91723  
gabrielenoindians@yahoo.  
(626) 926-4131

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490 Gabrielino Tongva  
Bellflower , CA 90707  
gtongva@verizon.net  
(562) 761-6417 Voice/Fax

Gabrielino-Tongva Tribe  
Conrad Acuna  
1999 Avenue of the Stars, Suite 1100 Gabrielino  
Los Angeles , CA 90067

This list is current only as of the date of this document.

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

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Washington National Mixed-Use Development Project, Culver City, Los Angeles County.

**Native American Contact List  
Los Angeles County  
August 6, 2015**

Gabrielino /Tongva Nation  
Sam Dunlap, Cultural Resources Director  
P.O. Box 86908 Gabrielino Tongva  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
(909) 262-9351

**This list is current only as of the date of this document.**

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

**This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Washington National Mixed-Use Development Project, Culver City, Los Angeles County.**

August 19, 2015



Andrew Salas, Chairperson  
**GABRIELENO BAND OF MISSION  
INDIANS – KIZH NATION**  
P.O. BOX 393  
Covina, CA 91723

**RE: PROPOSED WASHINGTON NATIONAL MIXED-USE DEVELOPMENT  
PROJECT; CULVER CITY AND CITY OF LOS ANGELES, CALIFORNIA**

Dear Mr. Salas:

PCR Services Corporation (“PCR”) is preparing environmental documentation to support a Mitigated Negative Declaration for the proposed Washington National Mixed Use Project in Culver City and the City of Los Angeles, California.

The proposed project consists of a standalone 5-story office building with retail spaces on the ground level. Two interconnected 5 and 6 story buildings, including a 148-room boutique hotel and a 200-unit residential complex with amenities atop a podium, would also be developed as part of the project. The ground level below the podium building would offer more retail and restaurant spaces. Short-term parking and service areas would also be located under the podium. Long-term parking would be located on two and a half levels of subterranean parking, with 300 spaces allocated for Metro use. The buildings would all be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels. Adjacent to the Expo Station would be the Transit Plaza, which would also be the main public open space on the site.

In order to ensure that any areas containing cultural resources or sacred lands are considered, PCR requests any information you are willing to share regarding Native American resources (including properties, places, or archaeological sites) in the vicinity of the project site that may be affected by the proposed project. The project site is located in an un-sectioned portion of Township 2 South, Range 14 West of the Beverly Hills, California United States Geologic Survey 7.5’ topographic quadrangle map (see Figure 1).

Thank you for your assistance with our efforts to address possible Native American concerns that may be affected by the proposed project. If you have any questions or need additional information, please contact me at (949) 753-7001 or via email at [f.clark@pcrnet.com](mailto:f.clark@pcrnet.com)

Sincerely,  
**PCR SERVICES CORPORATION**

A handwritten signature in blue ink, appearing to read "Fatima Clark", is written over a white rectangular area.

Fatima Clark  
Archaeologist

Attachment

## Fatima Clark

---

**From:** Fatima Clark  
**Sent:** Tuesday, September 08, 2015 1:24 PM  
**To:** 'Johntommy Rosas'  
**Cc:** Kyle Garcia  
**Subject:** RE: Washington National Mixed Use Development Project: Native American Consultation

Mr. Rosas

Please contact the lead agency directly regarding your comments/requests for tribal records search consultation.

Thank you.

Fatima

**From:** Johntommy Rosas [mailto:tattnlaw@gmail.com]  
**Sent:** Tuesday, September 08, 2015 1:17 PM  
**To:** Fatima Clark  
**Subject:** Re: Washington National Mixed Use Development Project: Native American Consultation

you skipped this part ///

we charge \$50- per hour for those services your requesting -tribal records search  
consultation will be same price ytbtd -  
estimated time is 4 hours =\$200-invoice total- tribal records search  
please confirm approval or refusal to compensate in violation of ACHP guidance documents including  
discrimination laws-  
thanks jt

On Tue, Sep 8, 2015 at 12:44 PM, Fatima Clark <[F.Clark@pcrnet.com](mailto:F.Clark@pcrnet.com)> wrote:

Dear Mr. Rosas

Thank you for providing your comments on the Washington National Mixed Use Development Project.

The maximum depth of excavation for the Project is expected to be approximately 36 feet. The volume of cut (mass excavation + spoils from foundation excavation) is approximately 280,000 CY. Approximately 550 CY of backfill are also anticipated.

The site is currently entirely improved with urbanized uses (commercial buildings and surface paved parking areas). There are no biological resources or water courses on the site. Thus, no federal or state biology related permits are needed.

Please contact the City planner to request the construction/excavation plans and any other additional questions you may have regarding this project. All further communications should be with the City pursuant to AB 52. The contact information is provided below:

Susan Yun, Senior Planner

Culver City Planning Division

9770 Culver Blvd.

Culver City, CA 90232

Email: [susan-yun@culvercity.org](mailto:susan-yun@culvercity.org)

Phone: [310-253-5755](tel:310-253-5755)

Please let me know if you have any further questions or comments. Thank you!

-Fatima

**From:** Johntommy Rosas [mailto:[tattnlaw@gmail.com](mailto:tattnlaw@gmail.com)]

**Sent:** Thursday, August 20, 2015 3:46 PM

**To:** Fatima Clark

**Subject:** Re: Washington National Mixed Use Development Project: Native American Consultation

thanks [expand email and show all text /attachments ]

your letter doesnt express or contain any required sec 106 nhpa/ab52 /ajr 42 -undrip tribal consultation compliance language-please amend /correct -

we have significant land and water rights, preemptive/preexisting claims on that project ape and beyond including sacred sites that are documented-

your letter also excludes the total amounts of estimated excavations so please provide them- [in cubic yards is fine]

also please send the construction/excavation plans to us by email to me -

please provide lead agency contact or project manager so we can ask some direct questions that are confidential-

your letter doesnt disclose fed permits either or state permits-ie sec 404/408 and any rwqcb water board permits etc sec 401-

and if its a mitigation/remediation /or by order so please explain the projects permits applications

we have some older arch/reports of that area that we can let you folks use from our database under strict conditional use /license-

we charge \$50- per hour for those services your requesting -tribal records search

consultation will be same price ytbd -

estimated time is 4 hours =\$200-invoice total- tribal records search

please confirm approval or refusal to compensate in violation of ACHP guidance documents including discrimination laws-

thanks jt

On Thu, Aug 20, 2015 at 9:06 AM, Fatima Clark <[F.Clark@pcrnet.com](mailto:F.Clark@pcrnet.com)> wrote:

Dear Mr. Rosas

Attached you will find a Native American consultation letter & location map for the proposed Washington National Mixed Use Development Project in Culver City and the City of Los Angeles.

Thank you for your assistance.

**Fatima Clark**

*Archaeologist*



**PCR Services Corporation • *40 Years of Service***

**Santa Monica • Irvine • Pasadena**

2121 Alton Parkway, Suite 100 | Irvine, California 92606 | T: [949.753.7001](tel:949.753.7001) | [www.pcrnet.com](http://www.pcrnet.com)

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--

**JOHN TOMMY ROSAS**

TRIBAL ADMINISTRATOR  
TRIBAL LITIGATOR  
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER UNDRIP

AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AJ52-AJR 42

**25 U.S. Code § 1679 - Public Law 85-671**

**August 18, 1958 | [H. R. 2824] 72 Stat. 619**

Tribal sovereignty in the United States is the inherent authority of indigenous tribes to govern themselves within and outside the borders and waters of the United States of America .

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[tongvanation.org](http://tongvanation.org)

--

**JOHN TOMMY ROSAS**

TRIBAL ADMINISTRATOR  
TRIBAL LITIGATOR  
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION

A TRIBAL SOVEREIGN NATION UNDER UNDRIP

AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AJ52-AJR 42

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[tongvanation.org](http://tongvanation.org)



## Memorandum

**TO:** PCR Services Corporation  
**CC:**  
**FROM:** Fatima Clark  
**RE:**

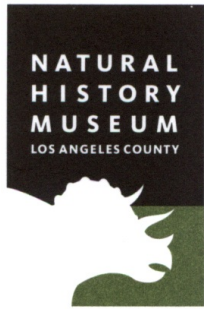
**DATE: 10/14/2015**

### **Culver City-Washington National**

On October 14, 2015, Robert Dorame of the Gabrielino Tongva Indians called PCR at 12:35 p.m. and spoke to Fatima Clark. Mr. Dorame recommended monitoring by a Native American monitor at the Project Site during ground disturbing activities, as his lineal descendency has close ties to the Project Site. Mr. Dorame also mentioned that his great grandmother lived less than a mile away and close to the Ballona Creek area. Mr. Dorame apologized that he is just now commenting on the project since he just recently received the Native American consultation letter. He mentioned that their P.O. box had gotten vandalized.

Natural History Museum  
of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, CA 90007

tel 213.763.DINO  
www.nhm.org



Vertebrate Paleontology Section  
Telephone: (213) 763-3325  
Fax: (213) 746-7431  
e-mail: [smcleod@nhm.org](mailto:smcleod@nhm.org)

30 July 2015

Planning Consultants Research  
2121 Alton Parkway, Suite 100  
Irvine, CA 92606

Attn: Fatima Clark, Archaeologist

re: Paleontological Records Check for the proposed Washington National Mixed Use Project, in  
Culver City, Los Angeles County, project area

Dear Fatima:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Washington National Mixed Use Project, in Culver City, Los Angeles County, project area as outlined on the portion of the Beverly Hills USGS topographic quadrangle map that you sent to me via e-mail on 7 July 2015. We do not have any vertebrate fossil localities that lie within the proposed project boundaries, but we do have localities nearby from the same sedimentary deposits that occur subsurface in the proposed project area.

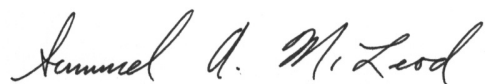
The entire proposed project area contains surface deposits of younger Quaternary Alluvium, derived primarily as fluvial deposits from Ballona Creek that flows just to the east. These deposits typically do not contain significant vertebrate fossils in the uppermost layers, but at relatively shallow depth in this area there are older Quaternary sediments that do contain significant fossil vertebrate remains. Our closest fossil vertebrate localities are in sediments around Ballona Creek where we have locality LACM 3368, just south of due east of the proposed project area along West Jefferson Boulevard on the east side of Ballona Creek, that produced a specimen of fossil horse, *Equus*, at unknown depth, and locality LACM 4250, just north of due east of the proposed project area southeast of the intersection of Jacob Street and Sentney Avenue on the west side of Ballona Creek, where remains of fossil mammoth, *Mammuthus*, were collected at unknown depth.

Our next closest vertebrate fossil locality in these deposits is LACM 4232, southeast of the proposed project area near the intersection of La Cienega Boulevard with Rodeo Road, where remains of fossil human, *Homo sapiens*, were recovered from a depth of 12-13 feet below the surface. We have a number of additional fossil vertebrate localities east-southeast of the proposed project area, along the Southern Pacific Railway and Rodeo Road between Crenshaw Boulevard and Ballona Creek, that were collected in the 1920's during excavations for the Outfall Sewer in the area. Although shallow, most of these localities did not record the depth at which specimens were recovered. These localities include LACM 1159 that contained fossil human, *Homo sapiens*, at a depth of 19-23 feet, LACM 3366 with fossil camel, *Camelops* at unknown depth, LACM 3367 with fossil mastodon, *Mammut*, at unknown depth, LACM 3369 with fossil horse, *Equus*, at a depth of only six feet below the surface, and LACM 3370 with fossil sabretooth cat, *Smilodon*, at unknown depth.

The uppermost few feet of soil and younger Quaternary Alluvium in the proposed project area are unlikely to contain significant fossil vertebrate remains, especially if they have been disturbed by prior construction activities. At depth, however, there is an very good chance of encountering significant vertebrate fossils, possibly even including human remains, as nearby localities have produced vertebrate fossils at depths as shallow as six feet. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

A handwritten signature in cursive script that reads "Samuel A. McLeod".

Samuel A. McLeod, Ph.D.  
Vertebrate Paleontology

enclosure: invoice