

October 29, 2018

10029.0005

Mr. Richard Rojas, AICP, Senior Planner
City of Carson, Planning Division
701 East Carson Street,
Carson, California 90745

Subject: Cultural Resources Inventory Report for the Victoria Greens Project, City of Carson, Los Angeles County, California – Negative Findings

Dear Mr. Rojas:

This letter documents the negative cultural resources inventory conducted by Dudek for the Victoria Greens Project (Project), located in the City of Carson, Los Angeles County, California. The City of Carson (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). All cultural resource fieldwork and reporting for this project has been conducted by archaeologists meeting the Secretary of the Interior's Professional Qualifications Standards. This study included initiation of Native American outreach, a California Historical Resource Information System (CHRIS) records search, a pedestrian survey, and documentation of results.

Project Location

The project site is located on the western edge of the City, which is located in the South Bay/Harbor area of the County of Los Angeles. Regionally, the City is bordered by the Cities of Long Beach, Compton, Torrance, and Los Angeles. Additionally, unincorporated Los Angeles County borders the northwest section of the City. Locally, the project is located at the northeast corner of Central Avenue and Victoria Street and contains Assessor Parcel Numbers (APNs) 7319-003-104, 7319-003-105, and 7319-003-106. Specifically, the project falls on public land survey system (PLSS) Township 3 South, Range 13 West, within Section 33 of the *Long Beach*, CA 7.5-minute USGS Quadrangle (Appendix A: Figure 1).

Project Description

The project proposes to develop 176 new three-story townhomes on currently unused land on the northeast corner of Central Avenue and Victoria Street in the city of Carson. The community would be gated and would include a dog park, a linear park, and a recreation center. Each unit would have an attached two-car garage. No subsurface parking or basements are planned for the development. The project would include over 23,000 square feet of recreational space.

Regulatory Context

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

State

The California Register of Historical Resources (CRHR)

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

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

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

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

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

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

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

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

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

- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

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

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

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

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

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

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

California State Assembly Bill 52

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

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

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

California Health and Safety Code Section 7050.5

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

Local Regulations

Los Angeles Historic-Cultural Monuments

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

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

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

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

Historic Preservation Overlay Zones

The City's Historic Preservation Overlay Zone (HPOZ) Ordinance was adopted in 1979 and amended in 2004 to identify and protect neighborhoods with distinct architectural and cultural resources. HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties within designated districts.

Regarding HPOZ eligibility, City of Los Angeles Ordinance Number 175,891 states (Los Angeles Municipal Code, Section 12.20.3):

Features designated as contributing shall meet one or more of the following criteria:

- (1) adds to the Historic architectural qualities or Historic associations for which a property is significant because it was present during the period of significance, and possesses Historic integrity reflecting its character at that time; or
- (2) owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city; or
- (3) retaining the building, structure, Landscaping, or Natural Feature, would contribute to the preservation and protection of an Historic place or area of Historic interest in the City.

Permits for Historical and Cultural Buildings

Regarding effects on federal and locally significant properties, the Los Angeles Municipal Code states the following (Section 91.106.4.5, Permits for Historical and Cultural Buildings):

The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a

significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.

Background Research

SCCIC Records Search

On June 12, 2018, Dudek completed a search of the California Historical Resources Information System at the SCCIC, located on the campus of California State University, Fullerton of the project area and a 1 mile (1,609 feet) record search area. This search included mapped prehistoric, historical, and built-environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. The confidential records search results are also provide in Appendix A.

Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 22 previous cultural resource studies have been conducted within the records search area between 1976 and 2011. None of the previously conducted cultural resource studies intersect the project site, and three of the cultural resource studies are adjacent to the project site. All 22 studies are summarized below in Table 1.

Table 1. Previous Technical Studies Within 0.5-miles of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-00359	Stickel, Gary E. and Jerry B. Howard	1976	Final Report of a Cultural Resource Survey in Long Beach, California	Outside
LA-00679	Weil, Edward B.	1980	Cultural Resource Evaluation of Proposed Improvements of 190th Street Carson, California.	Outside
LA-00826	Cooley, Theodore G.	1980	Archaeological Assessment for Tentative Tract 30756	Outside
LA-00946	Weil, Edward B.	1981	Cultural Resource Evaluation of Tentative Tract #13497 Los Angeles County, Calif.	Outside
LA-01099	Weil, Edward B.	1981	Cultural Resource Evaluation for Tentative Parcel Map #14510 Los Angeles County, California	Outside
LA-01290	Chavez, David	1983	Cultural Resources Evaluation for the Compton Co-generation Plant, City of Compton, California	Outside
LA-01899	Del Chario, Kathleen C. and Carol R. Demcak	1989	Cultural Resource Assessment for a 300 Acre Parcel of Land Near Carson, Los Angeles County, California	Outside

Table 1. Previous Technical Studies Within 0.5-miles of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-03871	McLean, Deborah K.	1998	Archaeological Assessment for Pacific Bell Mobile Services, Telecommunications Facility La-152-32, 1299 East Artesia Blvd, City of Carson, Los Angeles County, Ca.	Outside
LA-04512	Eggers, A.V.	1977	Cultural Resources Inventory of the City of Carson, California	Adjacent
LA-05699	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm 115-05 Los Angeles County, California	Outside
LA-05948	Duke, Curt	2002	Cultural Resource Assessment At&t Wireless Services Facility No. 05070a-01 Los Angeles County, California	Outside
LA-06183	Duke, Curt	2002	Cultural Resource Assessment at & T Wireless Services Facility No. 05233 B Los Angeles County, California	Outside
LA-07011	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm 115-06 Los Angeles County, California	Outside
LA-08433	Bonner, Wayne H.	2004	Cultural Resource Records Search Results and Site Visit for At&t Site Candidate 950-005-234d (rancho Tech Center), 901 West Victoria Street, Compton, Los Angeles County, California	Outside
LA-08722	Fulton, Phil and Terri Fulton	2007	Cultural Resource Assessment, Verizon Wireless Services, Dominguez University Facility, City of Carson, Los Angeles County, California	Outside
LA-09132	Bonner, Wayne H.	2000	Archaeological Survey California State University Dominguez Hills, City of Carson, Los Angeles County California	Outside
LA-09337	Bonner, Wayne H.	2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA131124D(R) (VZW Cal Water), 18800 South Wilmington Avenue, Compton, Los Angeles County, California	Outside
LA-10507	Anonymous	1983	Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report	Adjacent
LA-10976	Fulton, Phil and Terri Fulton	2009	Cultural Resource Assessment, Verizon Wireless Services, Dominguez University Facility, City of Carson, Los Angeles County, California	Outside
LA-11150	Maxwell, Pamela	2003	West Basin Municipal Water District Harbor/ South Bay Water Recycling Project	Adjacent
LA-11294	White, Laura	2009	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Facility LA33696B (M3-T6 Lighthipe La Fresa), City of Compton, Los Angeles County, California	Outside

Table 1. Previous Technical Studies Within 0.5-miles of the Project Site

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-11541	Loftus, Shannon	2011	Cultural Resource records Search and Site Survey. T-Mobile Site LA33696C, Walton Middle School 900 West Greenleaf Drive Compton, Los Angeles county, California 90220	Outside

Previously Recorded Cultural Resources

SCCIC records indicate that a total of three previously recorded cultural resources fall within 1.0 mile of the project site, none of which are within the project site. All resources are built environment resources. None of these resources intersect the project site. Table 2 below summarizes these three resources below.

Table 2. Previously Recorded Archaeological Resources Within 0.5-miles of the Project Site

Primary	Trinomial	Age	NRHP Eligibility	Description	Recorded By/Year	Proximity to APE
P-19-186534	-	Historic	Not evaluated	Site of 1st US Air Meet	1980 (J. Arbuckle); 1992 (RT Factfinders)	Outside
P-19-188476	-	Historic	Not evaluated	7-Eleven Olympic Velodrome	2000 (Fafarman, Lawrence)	Outside
P-19-188477	-	Historic	Found Ineligible	SCE Transmission Tower	2009 (White, Laura S., Archaeological Associates)	Outside

NAHC and Tribal Correspondence

Dudek contacted the Native American Heritage Commission (NAHC) on June 5, 2018 and requested a review of the Sacred Lands File (SLF) review. The NAHC replied via email on June 11, 2018 stating that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project and provided a list of five Native American individuals and tribal groups.

Letters were sent to each representative June 13, 2018. This outreach was conducted for informational purposes only and does not constitute formal government-to-government consultation. To date, one response has been received from the Gabrielino Band of Mission Indians –Kizh Nation requesting official government to government consultation in regards to the project. Should any more responses be received, they will be forwarded to the City. Documentation of coordination with Native American groups and individuals is provided in Appendix B. This outreach was conducted for informational purposes only and does not constitute formal government-to-government consultation.

Historic Aerial Review

Dudek consulted historic maps and aerial photographs to understand development of the project site and surrounding properties. Topographic maps were available from the following years: 1896, 1899, 1902, 1906, 1911, 1916, 1923, 1924, 1926, 1929, 1930, 1934, 1939, 1942, 1951, 1952, 1955, 1963, 1966, 1975, 1982, 1987, and 2012. Aerial images were available from the following years: 1952, 1963, 1972, 1980, 1994, 2002, 2003, 2004, 2005, 2009, 2010, 2012, and 2014 (NETR 2018a, 2018b).

Topographic maps indicate that the project site and vicinity were undeveloped until 1930 when the project area and surrounding properties were developed for Oil Wells, this mainly included dispersed structures throughout the general area. Within the project site itself, there were two medium sized buildings and three structure mapped on the 1930 topographic map. The project site and nearby vicinity remained an oil field, which expanded throughout the area until the late 1980s. After the 1980s, the extant subdivisions were built.

Historic aerials from the mid twentieth century show the project site and vicinity was sparsely developed and was being used for the aforementioned oil fields and for agricultural purposes at the time. Between 1952 and 1972 there were only small changes to the area though large subdivisions were present south of East University Drive and west of South Avalon Boulevard. By 1972 the campus of California State University, Dominguez Hills was built, commercial structures were built north of Albertoni Street, and small residential subdivisions to the west of the Project Site had been built. At this point, there was only one structure on the project site, likely a remnant of the Oil Fields. Between 1980 and 1994 the buildings at 17900 South Central Avenue, which is on the same block as the project site but will not be demolished as part of the proposed project, was built. There appeared to be one structure north of this complex, within the current project site, at this time as well. In 2003, historic aerials indicate that much of the project site was being graded. The northern and southern boundary were lined with trees. The structures along the western boundary that were present in 1994 were still present at this time. By 2009, the building that was located north of 17900 South Central Avenue had been demolished, and it appears the only remnants of this structure was the parking lot, which is located in the northwestern corner of the project site. No significant changes have occurred to the project site since this time. Between the 1970s and present the general area experienced many changes including the construction of the 91 freeway, subdivisions to the south, and west of the project site, and commercial development to the north and west.

Cultural Resource Survey

Field Methodology

A qualified Dudek archaeologist conducted a survey of the project area on June 22, 2018. The survey was conducted using standard paleontological and archaeological procedures and techniques. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. Pedestrian transects were walked on throughout the project area. Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials and to record locational information.

Following California Office of Historic Preservation (OHP) guidelines, any cultural material more than 45 years old should be recorded as an archaeological site, built environment resource, or isolate, as appropriate. All fieldwork was documented using field notes and iPad technology with close-scale field maps, and aerial photographs.

Location-specific photographs were taken using an Apple 3rd Generation iPad equipped with 8 mega-pixel (MP) resolution and georeferenced PDF maps of the project area. All field notes, photographs, and records related to the current study are on file at Dudek’s Pasadena, California office.

Results

The project site is a flat landform that is covered with dried grasses, weeds and one large tree. Ground visibility throughout the project site is generally poor (20-30%). Several rodent holes and burrows are present throughout the project site. Much of the project site appears disturbed, evidenced by vehicular tracks throughout the site, grading scars, and push-piles. These features are evidence of grading episodes that the site has undergone in recent history. There is modern trash and debris scattered throughout the site, large amounts of which have built up along all perimeters. Soils within the area are made up of light brown sandy silt with large amounts of gravel and cobble inclusions. Additionally, broken pieces of concrete and asphalt are strewn throughout the site. In the northwest corner of the site, an irregularly shaped asphalt parking lot is present; this parking lot was associated with the building which would have been directly to the south; however close inspection of this area failed to reveal any foundations or structural remnants. No prehistoric or historic archaeological resources were identified during the pedestrian survey. Figures 2-5 in Appendix A show overviews of the project site.

Summary and Management Considerations

No archaeological resources were identified within the project site or immediate vicinity as a result of intensive pedestrian survey, the CHRIS records search, a search of the SLF, or through Native American coordination. The site has undergone extensive modification over time, which is evidenced by the grading scars and push-piles that are still present at the site. Though historic aerials indicate a building was once present within the site, close inspection of the area failed to indicate any remnants of this building. The disturbance within the site has likely heavily impacted and/or destroyed any surficial archaeological deposits that may have been present. There is a low potential for discovering significant archaeological resources during construction due to past landform modifications and the lack of resources nearby.

Unanticipated Archaeological Resources

There is a low probability of discovering significant archaeological deposits during construction. However, all construction crew should be alerted to the potential to encounter archaeological material. In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic

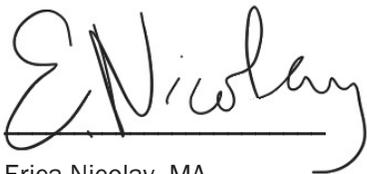
refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Unanticipated Human Remains

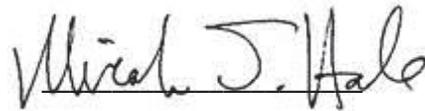
In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Should you have any questions relating to this report and its findings please do not hesitate to contact me directly.

Respectfully Submitted,



Erica Nicolay, MA
DUDEK
Office: (760) 936-7952
Email: enicolay@dudek.com



Micah Hale, PhD, RPA
DUDEK
Office: (760) 936-7952
Email: mhale@dudek.com

cc: Erica Nicolay, Micah Hale, Collin Ramsey

Att: Appendix A: Figures
Appendix B: SCCIC Records Search Information
Appendix C: NAHC Search Results and Tribal Correspondence

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APPENDIX A

Figures

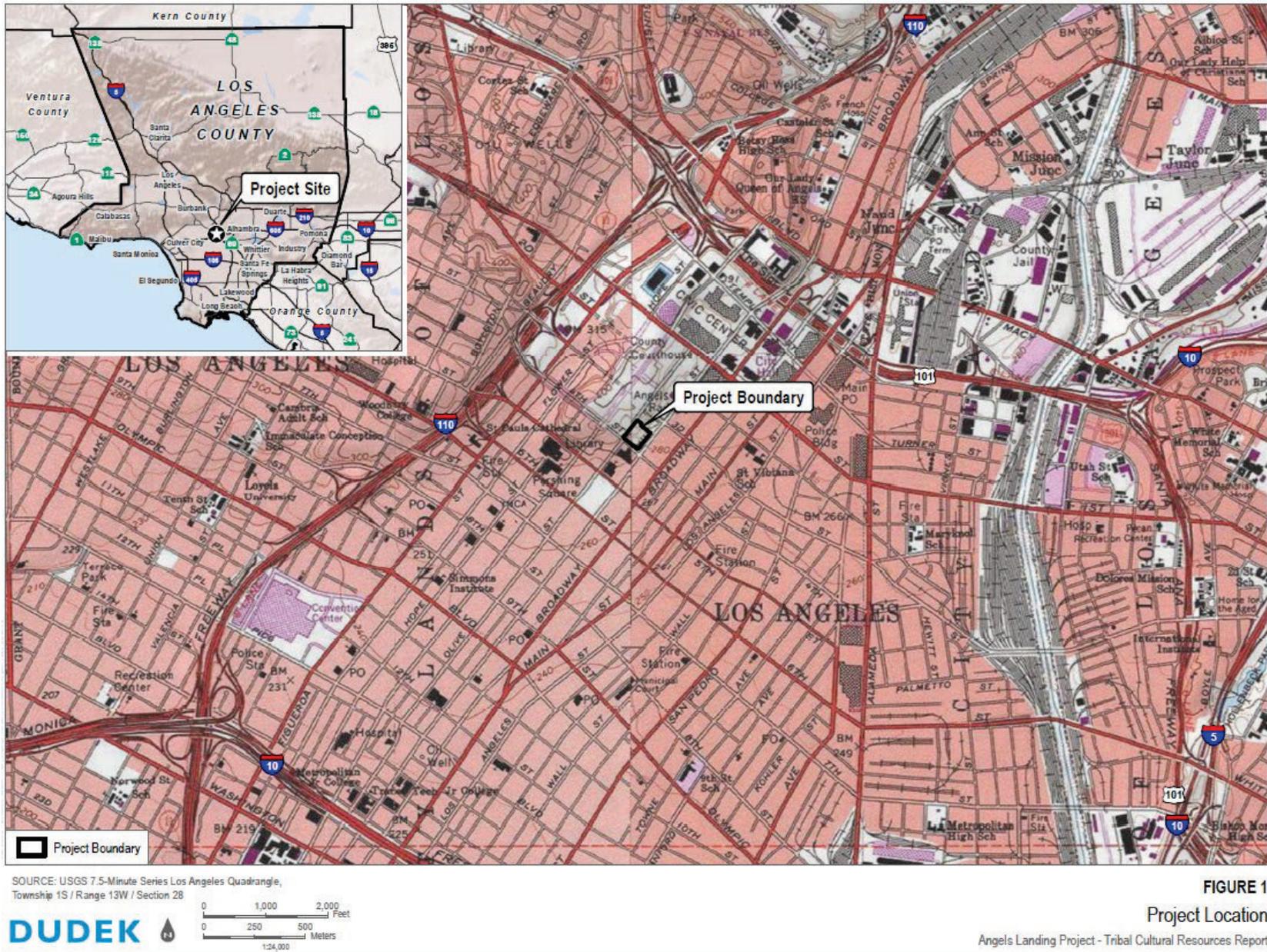




Figure 1. Overview of Project Site looking north



Figure 2. Overview of Project Site looking east.



Figure 3. Overview of Project Site looking south.



Figure 4. Overview of Project Site looking west.

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APPENDIX B

SCCIC Records Search Results- Confidential



APPENDIX C

Record of NAHC and Tribal Correspondence

STATE OF CALIFORNIA

Edmund G. Brown, Jr. Governor

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95891
(916) 373-3710



June 11, 2018

Erica Nicolay
Dudek

Sent by E-mail: enicolay@dudek.com

RE: Proposed Victoria Greens Development (Project 10029.5) Project, City of Carson; Long Beach USGS Quadrangle, Los Angeles County, California

Dear Ms. Nicolay:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* was completed for the area of potential project effect (APE) referenced above with negative results. Please note that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.

Attached is a list of tribes culturally affiliated to the project area. I suggest you contact all of the listed Tribes. If they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC 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 via email: gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton

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

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**Native American Heritage Commission
Native American Contact List
Los Angeles County
6/11/2018**

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

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

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

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

Gabrielino /Tongva Nation

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

**Gabrielino Tongva Indians of
California Tribal Council**

Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com
Gabrielino

Gabrielino-Tongva Tribe

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

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 Victoria Greens Development Project, Los Angeles County.

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