Appendix C-2

Cultural Resources Evaluation Letter Report

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Cultural Resources Evaluation Letter Report for the Imperial Avalon Mobile Estates Project, Carson, Los Angeles County, California

Dear Ms. Horak,

This Letter Report summarizes a cultural resources study conducted by ASM Affiliates, Inc. (ASM) for the Imperial Avalon Mobile Estates Project (Project), located in the City of Carson, Los Angeles County, California. The study includes an archaeological assessment and a paleontological records search for the Project area. The Project area currently contains an actively occupied mobile home park; the park itself and the structures within are being considered in a separate Historical Resource Assessment report (ARG 2019). This study is being conducted in order to assess the potential for the presence of archaeological and paleontological resources within the Project area, in compliance with the California Environmental Quality Act (CEQA).

This Letter Report is divided into the following sections: Introduction, Methodology, Archival Research, Cultural and Environmental Setting, Brief History of Compton, Survey Results, Eligibility Criteria, Evaluation of Eligibility, Impacts Assessment, Recommended Mitigation, and Conclusion. References are included as Attachment A; figures and photographs as Attachment B; a summary of the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) records search as Attachment C; correspondence with the Native American Heritage Commission (NAHC) and potentially interested tribes in Attachment D; and the paleontological assessment from the Natural History Museum of Los Angeles County is included as Attachment E.

INTRODUCTION

The Project site encompasses the current Imperial Avalon Mobile Estates mobile home park, located at 21207 South Avalon Boulevard (APNs 7337-001-025 through -029) in the City of Carson, California (Attachment B, Figures 1 and 2). The site is bounded by South Avalon Boulevard to the east, Grace Avenue to the west, Interstate (I-) 405 to the northeast, and residences and a car dealership to the south.

ASM prepared this report to assess the potential for cultural and paleontological resources to be impacted by the Project. In support of this effort, ASM conducted records searches and background research to assess the archaeological and paleontological potential of the Project area, as well as a limited pedestrian survey. No cultural resources have been previously recorded within or in proximity to the Project area or discovered as a result of this study. These results combined with site-specific background research indicate very low potential for the presence of archaeological or paleontological resources.

METHODOLOGY

ASM began the cultural resources study by requesting a records search from the SCCIC on August 27, 2019; the search was completed on September 5, 2019. A search of the Sacred Lands File (SLF) held by the NAHC was requested on September 4, 2019; the response from the NAHC was received on September 23, 2019. A request for a paleontological assessment of the Project area by the Natural History Museum of Los Angeles County was submitted on September 18, 2019, the results of which were received on October 2, 2019. ASM's Senior Archaeologist Sherri Andrews, M.A., RPA conducted an archaeological field survey of accessible portions of the Project area on September 30, 2019. ASM also conducted additional background research and consulted historic maps and aerial photos to further understand the development of the area over time.

ARCHIVAL RESEARCH

SCCIC Records Search

The SCCIC records search was conducted to determine whether the Project area has been previously subject to survey as well as the presence or absence of cultural resources previously documented within the Project area. The search included all records and documents on file with the SCCIC, as well as the Office of Historic Preservation (OHP) Historic Properties Directory. The summary letter provided by the SCCIC is included with this memo as Attachment C.

A total of 19 previous reports were identified as a result of the records search (Table 1), only one of which encompasses the Project area: an extensive cultural resources inventory of the City of Carson, conducted for the Carson Community Planning Department in 1977 (bolded below).

Table 1. Previous Cultural Resource Projects Conducted within the 1-Mile Records Search Radius

Report No. (LA-)	Year	Author(s)/Affiliation	Title
00229	1976	Hector, Susan M. / University of California, Los Angeles Archaeological Survey	Letter Report on the Archaeological Survey of a Los Angeles County Sanitation District Project Engineer Report for Main Street Relief Trunk Sewer Section 1
02258	1991	Breece, William H. / LSA Associates, Inc.	Archaeological Survey Results: Proposed Oil Shell Oil Company Inter-refinery Pipelines Project Carson, California
02749	1992	Charroin, Andrea / LSA Associates, Inc.	Archaeological Monitoring for Shell Pipeline
03204	1995	Wlodarski, Robert J. / Historical, Environmental, Archaeological, Research, Team (H.E.A.R.T.)	The Results of a Phase 1 Archaeological Study for the Proposed Del Amo Boulevard Extension Project, City of Carson, Los Angeles County, California
03809	1979	Caltrans	Historic Property Survey, Del Amo Blvd. Figueroa St. to Avalon Blvd.
04512	**1977**	**Eggers, A. V.**	**Cultural Resources Inventory of the City of Carson, California**
06194	2002	White, Laura S. / Archaeological Associates, Ltd.	Records Search Results for the Carson Town Center Project Eda Grant, City of Carson, Los Angeles County, California
06200	2002	McKenna, Jeanette A. / McKenna et al.	Cultural Resource Assessment/Evaluation for Nextel Communications Site CA-7805-a, Carson, Los Angeles County, California
06867	2003	Harper, Caprice D. / LSA Associates, Inc.	Cultural Resource Assessment Cingular Wireless Facility No. Sm 216-03 Carson, Los Angeles County, California
07012	2002	Bonner, Wayne H. / W. H. Bonner Associates	Records Search Results for Cingular Wireless Site Sm-216-01 (the All in One Parties Site) Located at 22225 S. Main St., Carson, Los Angeles County, California

Report No. (LA-)	Year	Author(s)/Affiliation	Title
08314	2006	Bonner, Wayne H. / Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate La03551 (nexus), 20770-80 Leapwood Avenue, Carson, Los Angeles County, California
09345	2008	Bonner, Wayne H. / Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate LA2836C (Carson Park), 21440 Main Street, Carson, Los Angeles County, California
09627	2008	Wlodarski, Robert J. / Cellular Archaeological Resource Evaluations	Proposed Bechtel Wireless Telecommunications Site OC0195 (C & H Printing), Located at 6046 Lincoln Avenue, Cypress, California 90630
10158	2007	Knell, Edward J., and James Steely / SWCA Environmental Consultants	Cultural Resources Survey for the Carson Terminal Redevelopment Project, Los Angeles County, CA
10250	2009	Bonner, Wayne H. / Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33769B (Ranch Fish Market), 117 East 223rd Street, Carson, Los Angeles County, California
10727	2010	Bonner, Wayne H. / Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33769-C (Ranch Fish Market), 117 East 223rd Street, Carson, Los Angeles County, California
11101	2010	Johnson, Brent / Heritage Preservation Consultants	Cultural Resources Records Search and Site Visit for T-Mobile USA Inc. LA23222A/Riostone, 21130 S. Main Street, Carson, Los Angeles County, California 90746
11482	1939	Racer, F. H.	Camp Sites in Harbor District
12983	2014	Tang, Bai / CRM Tech	Evaluation of Potential Historical Resource Carson Station, Los Angeles County Sheriff's Department los Angeles County, California UltraSystems Environmental Project No. 5933

Two additional documents related to project areas adjacent to the current proposed Project were located online. One is an Archaeological Survey Report created for Caltrans' proposed I-405/Avalon Boulevard Interchange Improvements (Rockman 2007) that encompassed the area adjacent to the northeast corner of the Project area. This report concluded that there was a low potential for that proposed project to encounter buried cultural deposits.

The other document is an Environmental Impact Report created for the Boulevards at South Bay development project (PCR 2006) situated just to the north of the current Project site. This report concluded that implementation of the project would result in a less than significant impact due to prior disturbances and previous land use within the overall area.

Four resources have been previously documented within the 1-mile (mi.) records search radius, none of which appear within the Project area. Two of the resources documented within the records search radius are prehistoric and two are historic (Table 2).

Table 2. Resources Previously Recorded within the 1-Mile Records Search Radius

Primary # (P-19-)	Trinomial (CA-SBR-)	Recorded by / Date	Description	Attribute Codes	Relationship to Project Area
000106	106	Racer / 1939	-	AP2. Lithic scatter; AP15. Habitation debris; AP16. Other	0.85 mi. SW
000795	795	Rosen / 1977	-	AP2. Lithic scatter; AP15. Habitation debris	1.0 mi. SSE
188395	-	Steely, SWCA Environmental Consultants / 2007	Carson Terminal, Shell Oil Co; Dominguez Refinery	HP6. 1-3 story commercial building; HP8. Industrial building; HP11. Engineering structure	0.4 mi. E
189309	-	Valasik, Cogstone / 2011	Carson Standpipes	AH5. Wells/cisterns	0.3 mi. SSW

The two prehistoric sites identified by the records search consist of lithic scatters and habitation debris. CA-LAN-106 was recorded in 1939, situated approximately 0.85 mi. southwest of the Project area. The site documentation is minimal, briefly describing a shell midden and workshop of about 6 acres and containing shell, points, "shell beads," "a few arrowheads," and "several mortars … found by the Japanese gardener." CA-LAN-795 was recorded in 1977 approximately 1.0 mi. south-southeast of the Project area. The site was documented as consisting of two loci: Locus A which consisted of portable milling stone fragments, cores and flaked tools of multiple raw material types (chert, siltstone, granite, and rhyolite) and two projectile points; Locus B consisted of a core and flakes. Shell and bone were also noted but no further information was provided. Based on the limited information available, archaeological sites that previously existed in the vicinity of the Project appear to have been largely surficial in nature.

Historical Image Research

Historic topographic maps dated 1896, 1899, 1905, 1910, 1916, 1922, 1924, 1926, 1927, 1930, 1939, 1953, 1959, 1966, 1975, 1982, 2012, and 2015 (NETR 2019a), as were historic aerials from 1952, 1963, 1972, 1980, 1994, 2002, 2003, 2004, 2005, 2009, 2010, 2012, 2014, and 2016 (NETR 2019b).

The historic maps indicate that the Project site was originally fully engulfed within a large slough. Reclamation of the land appears to have taken place sometime prior to 1930, when some roads appear, including Avalon Boulevard on the east and Grace Avenue on the west, and a channelized slough appears to the northeast of the project. The 1927 map still shows the slough in its original configuration; however, it seems likely that reclamation of the land would have begun earlier than that in order for the amount of infrastructure visible on the 1930 map to have been created. The 1939 map shows a smattering of structures within the project with several more appearing on the 1953 and 1959 maps. Fewer structures appear on the 1966 and 1975 topos, while the 1982 map labels the area 'Trailer Park' and shows all of its internal roads. The I-405 freeway first appears on the 1966 map. (Construction began in 1957 with the first section, mostly north of LAX Airport, completed in 1961 [signed as SR-7] followed by sections west of I-605 within the following few years. The highway was renumbered to I-405 during the 1964 renumbering.)

The 1952 aerial image appears to show at least some of the Project area being used for agricultural purposes. The 1972 image shows the Project area having undergone significant modification, with the eastern portion appearing to have been graded and the western portion appearing to consist of dirt hills cut with roads in preparation for the mobile home park development. The 1980 image shows the fully realized mobile home park; no significant changes appear to the present.

NAHC Sacred Lands File Search

A request for a search of the Sacred Lands File held by the California Native American Heritage Commission (NAHC) was made by ASM on September 4, 2019. This search was undertaken to supplement the SCCIC records search to inquire as to whether resources important to local Native American groups may exist within the proposed Project area that may not appear within the CHRIS system. The NAHC response of September 23, 2019, reported negative search results for the Project location. A list of five tribal entities who may have interest in the Project area was included with the NAHC response. Letters of inquiry were sent to each of these entities, but no responses were received. The NAHC response and query letters are provided with this memo as Attachment D.

CULTURAL AND ENVIRONMENTAL SETTING

Natural Setting

The City of Carson (City) is located in the South Bay area of Los Angeles County, in the northeastern portion of the Los Palos Verdes peninsula, approximately 17 mi. south of downtown Los Angeles and 6.5 mi. east of the Pacific Ocean (see Attachment B, Figures 1 and 2). The City is bounded by Torrance and Gardena to the west, Compton to the north, Lakewood to the east, and Long Beach to the south. The easterly boundary of the site is generally delineated by I-710, linking the City with the Long Beach and Harbor areas, and I-110 (Harbor Freeway) runs along the western edge. The Riverside Freeway (SR-91) traverses the northerly portion of the City and I-405 cutting northwest/southeast through the center of the City.

The Project vicinity is relatively flat, with the Dominguez Hills bordering the area to the northeast. The nearest water is the Dominguez Channel and Torrance Lateral Channel, both currently channelized drainages. No native vegetation remains, but prior to development, the area would have supported a coastal sage scrub community. Given the proximity to the coast and other water sources, the past wildlife community would have included an array of coastal and inland birds and mammals.

The City is largely urbanized and surrounded by other developed cities; the setting surrounding the Project area is primarily residential/industrial. The proposed Project site itself is currently fully developed, housing the Imperial Avalon Mobile Estates. The mobile home park has been operational in this location since 1975. All portions of the Project are currently beneath homes, paved, or heavily landscaped. No native ground surfaces remain within the Project area.

Prehistoric Background

The prehistoric occupation of southern California can be roughly divided into four temporal phases or periods (Wallace 1955). This chronology had been successfully applied to inland Los Angeles County (e.g., McIntyre 1990), and is now recognized as having applicability to a wide area of mesic (i.e., that area west of the xeric desert zone) Los Angeles, Ventura, Riverside, San Bernardino, and Orange counties. Due to the widespread application of this chronological scheme, Wallace's framework is employed for the purposes of this discussion.

Late Pleistocene Period (Pre-10,000 B.P.)

Wallace's chronology for southern California includes four time periods, the earliest of which (Early Man/Big Game Hunting period) was considered speculative, and correlated with the end of the Pleistocene, or Ice Age. This would represent an occupation prior to about 10,000 years before present (B.P.). Although it is likely that inhabitation of the southern California coastal region occurred during this early time period, evidence for such is currently extremely limited. To date, Late Pleistocene archaeological remains in southern California comprise two kinds of evidence. First, in the inland Mojave Desert region, petroglyphs (rock engravings) and surface stone tools have been dated back to approximately 20,000 and 30,000 B.P., respectively (Whitley and Dorn 1993). These may well reflect the initial human occupation of North America. The contexts of these dated finds provide only limited kinds of archaeological information and, while there is much more to be discovered about this earliest prehistoric culture, existing data nonetheless suggest that these earliest inland Californians may have dwelled along the shores of Pleistocene lakes; that they exploited chert quarries to make relatively crude stone chopping tools; and that they also made rock art, perhaps as part of shamanistic religious practices.

Second, a limited number of large fluted projectile points have been found in isolated locales in the Mojave Desert and along the California coast. These projectile points functioned as parts of spears and are known to date between 11,200 and 10,000 B.P., falling within what is called the Paleoindian Period on the Great Plains. On the Plains, such points are associated with the hunting of extinct Pleistocene fauna, such as the Columbian Mammoth. Although it is likely that these spear points were similarly used in southern California, the isolated nature of the discovered artifacts precludes any certain inference about their use or function in the California region.

Uncertainty concerning these early prehistoric cultures results from the characteristic geomorphological instability of the California coastline and the general youthfulness of the southern California interior, combined with the major change in erosional/degradational regimes that occurred at the end of the Pleistocene (Whitley and Dorn 1993). These factors, singularly and in combination, are unfavorable to the preservation of remains from this period. It is therefore likely that Late Pleistocene human occupation of Los Angeles is under-represented in the local prehistoric record, simply due to problems in site preservation.

Early Millingstone Period (10,000 - 3500 B.P.)

An adaptation referred to as the Early Millingstone Period or Horizon began with the transition toward a modern environment which started approximately 9,000 to 10,000 years ago. This is particularly evident along the coast, where many such sites are found, although a few examples are known from the inland region. Most sites of this Period date to between 8,500 and 3,500 years in age.

Recent studies by Erlandson (1988; see also, Erlandson and Colton 1991) provide evidence of a significant, even if small, population of coastal hunter-gatherers in the region before 7000 B.P., or essentially at the beginning of this Early Millingstone Period. He has shown that these were neither Big Game hunters, nor specialized, hard-seed gatherers, but instead generalized foragers that relied on a variety of different kinds of terrestrial, coastal and marine resources, and that they were adapted to estuarine embayments that have long since disappeared from the local environment. Further, his evidence indicates that their primary protein sources were shellfish and other marine resources. Extending a pattern first identified by Meighan (1959) on the Channel Islands, in other words, this suggests that the adaptation to the seashore is a very ancient and long-lived tradition in local prehistory.

In the inland region, perhaps the earliest evidence of the Early Millingstone Period is provided by so-called Los Angeles Woman, a female skeleton found in the La Brea Tar Pits that has been radiocarbon dated to 9000 B.P. Lacking clearly associated artifacts or other remains, it is difficult to interpret the Los Angeles

Woman beyond observing simply that her discovery signals the fact that the inland region was in use shortly after the end of the Late Pleistocene.

Later Early Millingstone sites (post-dating approximately 6000 B.P.) are dominated by assemblages containing large numbers of ground stone artifacts, along with crude choppers, scraper planes, and other core/cobble tools. These are thought to represent an adaptation to gathered plant foods, especially a reliance on hard-shelled seeds. Accordingly, it has been common practice to identify any site with a dominance of these plant processing implements as Early Millingstone in age. More recently, it has also been suggested that scraper planes, in particular, may have served in the processing of agave (Kowta 1969; Salls 1985); that the association of ground stone and core/cobble tools represents a generalized plant processing toolkit, rather than one emphasizing hard-seeds, per se (Whitley 1979), and that this toolkit was used in appropriate environmental settings throughout the prehistoric past. That is, that the so-called millingstone toolkit is environmentally rather than chronologically specific and reflects localized exploitative patterns, rather than a chronologically specific adaptational strategy (Kowta 1969; Leonard 1971; McIntyre 1990). Thus, many inland sites identified as dating to the Early Millingstone Period solely on the basis of their ground stone toolkits may, in fact, not be of such age at all. However, on the coastal strip there continues to be evidence that such sites date to the earlier end of the timeframe. These sites are generally located on terraces and mesas, above the coastal verge, near permanent streams.

Although Early Millingstone Period sites are relatively common along the coast, there is little evidence for the occupation of the inland region during this early time period. That is, although the millingstone adaptation to seeds and plants, and toolkits dominated by plant processing tools, are present in the inland zone, they appear to date to a later time period, with true Early Millingstone period occupation apparently restricted to the coastal strip proper (Whitley and Beaudry 1991; cf. Leonard 1971; McIntyre 1990). Again, it is currently unclear whether this pattern reflects real differences in inland versus coastal settlement distributions or is simply a function of site preservation problems in the inland region. Whatever the cause, it is worth noting that there are currently very few reliable or plausible chronometric dates from inland sites that are Early Millingstone in age. All current temporal assignments of inland sites to the Early Millingstone Period are based on putative diagnostic artifacts, but, when these are examined critically, the verity of the early age assignments become dubious. Also, too often such early age assignments are based on functional/adaptive traits rather than stylistic criteria, thus confusing adaptive patterns for temporal ones.

A good example of the confusion of millingstone functional and adaptational patterns for Early Millingstone chronological diagnostics in inland Los Angeles County is provided by the so-called "Topanga Culture," as exemplified by excavations at CA-LAN-1, the "Tank Site" (cf. Heizer and Lemert 1947; Treganza and Bierman 1958; Treganza and Malamud 1950), located in the Santa Monica Mountains immediately south of the San Fernando Valley. This is widely regarded as "Early Millingstone" chronologically, and its base ("Phase I") has been assigned 10,000 years of age, essentially due to the large numbers of millingstones, crude choppers and "cog stones" (see Treganza and Bierman 1958:75, Table 1). However, as Johnson (1966) has rightly pointed out, Phase III of the Topanga Culture is only 3,000 years old, as demonstrated by his excavations at CA-LAN-2. That is, it is Intermediate and not Early Millingstone in age. It then must follow that the preceding Phase II can only be considered 3,500 to 3,000 years old, due to the presence of (Intermediate Period) mortars and pestles in the Phase II assemblage. That is, Phase II of the Topanga Culture also can only be Intermediate period in age. Since Phase I lies conformably and immediately below Phase II stratigraphically, it likewise must follow that it immediately predates the Intermediate period Phase II remains. At best, then, Phase I of the Topanga Culture is terminal Early Millingstone or transitional Early Millingstone/Intermediate, but not necessarily of any great antiquity.

This fact is emphasized when it is recognized that one of the key classes of temporal diagnostics said to support the very early age assignment for Phase I at the Topanga Site, the cog stones, were all recovered

from the Phase II deposit, even though Treganza and Bierman (1958) incorrectly assign them to the Phase I assemblage (Eberhart 1961:366-367). Thus, there is currently no evidence to suggest any great antiquity for Phase I of the Topanga culture; instead it may simply be 4,000, rather than 10,000 years in age, and may represent an early manifestation of the Intermediate Period movement of a millingstone adaptation into the interior, rather than a manifestation of a coastal Early Millingstone culture in the inland zone.

Intermediate Period (3500 - 800 B.P.)

As implied above, a transitional stage followed the Early Millingstone, which is referred to as the Intermediate Period (Wallace 1955). It is believed to have begun about 3,500 years ago, and to have lasted until about 800 B.P. (according to the latest revisions; cf. Arnold 1987). It is marked on the coast by a growing exploitation of marine resources, the appearance of the hopper mortar and stone bowl/mortar, and a diversification and an increase in the number of chipped stone tools. Projectile points, in particular, are more common at sites than previously, while artifacts such as fishhooks and bone gorges also appear.

As noted above, cog stones also first appear during the Intermediate Period, although they are widely misinterpreted as Early Millingstone in age. These are relatively small, flat cobbles, about the size of a large biscuit, that were shaped to resemble a kind of mechanical cog or gear. Although the function of these is unknown, it is likely they served as ceremonial objects, and their geographical distribution has an important implication for regional prehistory. As first identified by Eberhart (1961), cog stones are only found from Los Angeles County south and eastward; that is, they are absent in the areas of the Santa Barbara Channel region (Ventura and Santa Barbara Counties) that, historically, were occupied by Chumash-speaking groups. Although speculative, this suggests that the initial distinction between the Hokan Chumash and Takic-speaking groups (which included the Gabrieliño) may have developed as early as 3,500 years ago (cf. Kowta 1969:50; McIntyre 1990:5), rather than only 1,500 years B.P., as Kroeber (1925) first hypothesized. That is, the distribution of these "ceremonial" artifacts essentially follows the boundaries of ethnolinguistic groups during the historical period, suggesting that such boundaries may have been more-or-less stable for about 3,500 years. Notably, this hypothesis is supported by excavations at Intermediate Period site CA-LAN-2233, in the Santa Clara River Valley to the north. At this site, osteometric and DNA analyses indicate that the resident population was non-Chumash genetically (Waugh 1999).

As also implied above, there is growing evidence that it was at the beginning of this Intermediate Period that inland sites, such as those found in the Conejo area on the north side of the Santa Monica Mountains, the upper Santa Clarita Valley, the Antelope Valley, and western Riverside and San Bernardino counties, were first established and occupied. Whether this pattern holds for the interior Los Angeles Basin has yet to be determined, but it seems likely. This suggests the exploitation of more varied environments and perhaps an increase in population at this time and, again, it may correlate with Kroeber's "Shoshonean Wedge" moving into mesic southern California at ca. 3500 B.P. (Kroeber 1923, 1925; cf. Whitley and Beaudry 1991). In general, however, the Intermediate Period can be argued to have set the stage for the accelerated changes that took place immediately following it.

Late Prehistoric (800 - 200 B.P.)

With the transition to the Late Prehistoric Period at 800 B.P. (A.D. 1200), we can correlate local prehistory with the ethnographic societies as described (even if in abbreviated form) by early chroniclers and missionaries. However, this is not to suggest that local societies and cultures were in any way static, for the transition to this period was marked by the evolution and eventual dominance of a sophisticated maritime economy. Further, among the Chumash to the west, a rise in social complexity has been shown to have been associated with the development of craft specialization, involving the use of standardized micro-drills to mass produce shell beads on Santa Cruz Island (Arnold 1987), which occurred during this period. This apparently contributed to, if not caused, the appearance of a simple chiefdom in the southern Chumash region (cf. Whitley and Clewlow 1979; Whitley and Beaudry 1991).

Although we do not have evidence that the Gabrieliño developed into a chiefdom like the neighboring Chumash, this period nonetheless witnessed a fluorescence of local aboriginal culture paralleling the Chumash case. This included a substantial growth in population, the establishment of permanent settlements on the coast (and probably at favored locales in the inland area), a high degree of sociopolitical complexity, and the development of a very sophisticated maritime economy. It was during this period that the occupants of the Santa Barbara Channel and Los Angeles County region achieved levels of cultural and social sophistication perhaps unrivaled by hunter-gatherer-fisher groups anywhere else in the world (Brown 1967; Johnston 1962; Landberg 1965; Wallace 1955).

Ethnographic Background

The Project is situated within an area that was inhabited by the Tongva (also known as Gabrieliño) people who were present during the time of European contact. The names Gabrieliño and Fernandeño refer to the two major missions established in Gabrieliño territory: San Gabriel and San Fernando (Bean and Smith 1978). The Mission San Gabriel de Archangel was originally located in the Whittier Narrows area but relocated shortly after its founding because of unstable ground along the Rio Hondo/San Gabriel River channels (Blodgett/Baylosis Associates 2014). Ultimately, Gabrieliño/Tongva villages were depopulated due to impacts from the Spanish mission settlements at San Fernando Rey and San Gabriel and diseases that were introduced by the Spanish. However, many Gabrieliño/Tongva currently survive in a population that is dispersed throughout the Los Angeles area.

Gabrieliño/Tongva traditional territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles Rivers; portions of the Santa Monica and Santa Ana Mountains; the Los Angeles Basin; the coast from Aliso Creek to Topanga Creek; and San Clemente, San Nicolas, and Santa Catalina Islands. The Gabrieliño language is classified as belonging to the Takic family (or "Cupan"), Uto-Aztecan stock, and is subdivided into four or more separate dialects (Shipley 1978). The dialect spoken in the Project area was noted as being very similar to that spoken on Santa Catalina Island (Harrington 1962).

The Gabrieliño/Tongva are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith 1978). The Gabrieliño/Tongva are estimated to have numbered around 5,000 in the pre-contact period (Kroeber 1925). Maps produced by early explorers indicate the existence of at least 40 Gabrieliño/Tongva villages in fertile lowlands along streams and rivers and in sheltered areas along the coast, but as many as 100 may have existed prior to contact with Europeans (Bean and Smith 1978; McCawley 1996; Reid 1968). The larger permanent villages most likely had populations averaging 50 to 200 persons. Sedentary villages also had smaller satellite villages located at varying distances that were connected to the larger villages through economic, religious, and social ties (Bean and Smith 1978).

The Gabrieliño/Tongva lived in domed, circular structures covered with plant material, followed patrilineal kinship networks, were politically organized under a village chief, and spiritually directed by community shamans (Bean and Smith 1978). Their subsistence was based on a composite hunting and gathering strategy that included large and small land animals, sea mammals, river and ocean fish, and a variety of vegetal resources. Generally, settlements were created at the intersection of several ecozones. The majority of the population drifted as families to temporary hillside or coastal camps throughout the year, returning to the central location on ritual occasions or when resources were low and it was necessary to live on stored foods.

Offshore fishing, as well as travel between the mainland and the southern Channel Islands, was accomplished from boats made of pine planks sewn together and sealed with asphaltum or bitumen. Much of the fishing, shellfish harvesting, and fowling took place along the ocean shoreline or along freshwater courses. Sea mammals were taken with harpoons, spears, and clubs. River and ocean fishing was

undertaken with the use of line and hook, nets, basket traps, spears, and poisons (Hudson and Blackburn 1982).

Land animals were hunted with bow and arrow and throwing sticks, and were trapped or clubbed. Smaller animals such as rabbits and ground squirrels were driven with grass fires and taken with deadfall traps. Seasonal grass fires may have had the additive effect of yielding new shoots attractive to deer. Burrowing animals could be smoked from their lairs. The primary plant resources were acorns, which were gathered in the fall and processed with mortar and pestle, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and sages, various grasses, and islay or holly leafed-cherry (Reid 1968). Transportation of plant and other resources was accomplished through the use of burden devices such as coiled and woven baskets and hammock carrying nets commonly made from spun grass and other plant fibers.

BRIEF HISTORY OF CARSON

The following general history of Carson is drawn from the City's website (City of Carson n.d.).

Los Angeles Historical Marker No. 13 is located in the Watson Industrial Center in Carson, near the southeast corner of 230th Street and Utility Way, next to the Pioneer building. The marker commemorates the Gabrieliño/Tongva village of Suangna at this location, a site that was once part of a large village complex occupying the inner harbor area. In 1784, the village became part of the Rancho San Pedro (more generally known as the Dominguez Rancho), with some of the Native Americans working at the ranch as vaqueros. By the end of the nineteenth century, the village was no longer inhabited.

Some 200 years earlier, in the 1760s, when the first European explorers set foot on Southern California soil, a Spanish soldier named Juan Jose Dominguez was part of the Portola expedition. A few years later, when Franciscan missionaries began their journey on foot to establish the chain of California Missions, Juan Dominguez accompanied Father Junipero Serra as part of the small band of military men who helped to protect the padres.

When Senor Dominguez retired in 1782, after 30 years of service, he was rewarded by a gift from the Spanish governor of California: the very first land grant in the history of California - a vast expanse of 75,000 acres of land, which he named Rancho San Pedro. It stretched from the Los Angeles river all the way west to the Pacific Ocean, encompassing what today would be the cities of Carson, Torrance, Redondo Beach, Lomita, Wilmington, and parts of San Pedro. The center of this vast landhold was the Dominguez Rancho homestead, located in what today is the eastern portion of Carson, known as Dominguez Hills. It is here that his nephew built the historic Dominguez Ranch Adobe in 1826, which still stands today as a proud monument to Carson's romantic past. The Dominguez ranch home was also the site of a notable battle during the U.S. war with Mexico.

During the rancho period in Old California's history, vast herds of cattle roamed the hills and plains of the Los Angeles region, tended by vaqueros on horseback who marked the animals with the special lemon-shaped brand of the Dominguez Rancho. The cattle hides were sold to ships which docked at the San Pedro harbor (as documented in Richard Henry Dana's masterpiece "Two Years Before the Mast"), in return for dollars and merchandise the sailing ships brought from Europe. The rancho era lasted until the 1860s, when a disastrous series of droughts destroyed the cattle herds.

Almost 200 years after the founding of Rancho San Pedro, 142 years after the Dominguez Adobe was built, and 58 years following the Great Air Meet of 1910, the citizens of the land "to the west of the Los Angeles River" finally took a long overdue step toward independence. Carson was finally incorporated as a city in 1968. Compare that to Carson's neighbor to the east, Long Beach, which incorporated almost a

century earlier, in 1888, or to its neighbor to the west, Torrance, which became a city in 1921. In those intervening years, the area that is now Carson remained an unincorporated portion of Los Angeles County, and as a result, the young City of Carson is still struggling to overcome the penalties that came with delaying its incorporation. As such, when essential but less attractive facilities such as garbage dumps, auto dismantling centers, and waste treatment plants were needed in the South Bay, the incorporated cities such as Torrance and Redondo Beach had the political clout to resist the location of such controversial projects within their city borders. Since Carson was an unincorporated area for so long, with little political representation, it often ended up as the dumping ground (both literally and figuratively) of its neighbors.

On February 6, 1968, almost 10,000 of the 17,351 registered voters in Carson cast a vote. When the ballots were counted, the vote was 6,301 to 3,834 in favor of incorporation. Voters were also offered two choices for the name of the new city: Carson and Dominguez, the two leading family names in the history of Rancho San Pedro. George Henry Carson was a member of the Dominguez family. Ultimately, Dominguez came in a close second to Carson as the name for the newly incorporated city, with Carson winning by a narrow vote of just 318 votes. The city adopted the motto of "Future Unlimited" when it incorporated as a general law city on February 20, 1968. Its strategic location and vacant land were part of the reason for that statement of unbridled optimism.

Following its incorporation in 1968, Carson acted swiftly to close down most of the unwanted facilities that had been foisted upon the city in the past, enforcing a strict building and landscaping code, and a working to attract successful new commercial ventures. As a result, most of the heavy industry of the past has been replaced. The new industrial parks in Carson, such as the Watson Industrial Center, are models of cleanliness and attention to appearance. Beautification efforts by the city have resulted in numerous landscaped center medians, lighting projects, street improvements, and public parks. Even so, many of the prime building sites in Carson have a previous history as landfills or former refineries. This means any new construction on such contaminated industrial sites require lengthy procedures to deal with environmental concerns.

However, the City has been successful in making the most of such problem areas, reclaiming many areas formerly considered unusable. For example, the Carson Town Center, which opened in 1996, was built on land formerly used by the Golden Eagle refinery. A large parcel to the north of the Project site adjacent the I-405 has been slated for development as the Boulevards at South Bay (formerly known as Carson Marketplace); this parcel was previously used as a Class II landfill with an approximate closing date of February 1965.

Carson has grown from a population of 61,000 in 1968 to 94,826 in 2003. Over the years, three annexations have increased the city's size to 19.2 square miles, and steady and continued growth has enabled Carson to become a city of regional significance. While Carson is well known as an industrial center with unparalleled access to transportation and the Pacific Rim, it is also a culturally diverse community that is an attractive place to live and work.

Site-Specific History

The current Project area was once deemed "economically unworthy of development" as some parts of it were as much as 10 feet below grade and subject to flooding during rain events (*Los Angeles Times* 1972). However, the site was reclaimed in 1972-1973 using recycled materials to fill and level the site and develop road bases for the park. Fill dirt was trucked in from excavation sites and large chunks of concrete from highway improvements and similar projects were brought to the site to be crushed into cement gravel to create the road bases. As such, the site is comprised almost if not entirely of imported fill with virtually no potential to contain in situ archaeological features or deposits.

STUDY RESULTS

Archaeological Survey

The Project area is currently in use as an actively occupied mobile home park. All ground surfaces within and adjacent to the park have been heavily modified over time and/or fully landscaped. The areas with the greatest amount of exposed ground surface occur at the front of the park along South Avalon Boulevard (Attachment B, Figure 3). Even so, these areas have very clearly been extensively modified and no native ground surfaces are extant within the Project area. A recent small utility excavation near the entrance to the park was observed; these soils appear to be made up of fill materials (Attachment B, Figure 4). It is expected that the majority of the soils underlying the park are of similar constituency. No previously undocumented cultural resources were encountered during this study.

Paleontological Review

A review of the paleontology collection records held by the Natural History Museum of Los Angeles County did not reveal any vertebrate fossil localities that lie directly within the proposed Project area boundaries; however, they did find records of nearby localities from sedimentary deposits similar to those that occur in the proposed Project area, either at the surface or at depth. Shallow excavations in the uppermost few feet of the old lagoonal deposits or the younger Quaternary Alluvium deposits in the proposed project area probably will not uncover significant fossil vertebrate remains. The full records search summary report is included with this memo as Attachment E.

CONCLUSION

No archaeological resources were identified within the Project site or immediate vicinity as a result of the SCCIC and NAHC searches, additional background research, or the pedestrian survey, nor were any paleontological localities identified. The Project site has undergone extensive modification over time, with the vast majority if not the entirety of the site surface having been created by the introduction of fill materials to reclaim the previously unusable land here. Therefore, there will be no impacts to known historical resources as defined by CEQA as a result of the Project. Please feel free to contact me as needed if you have questions or concerns.

Sincerely,



Sherri Andrews
Senior Archaeologist
ASM Affiliates, Inc.
20 North Raymond Avenue, Suite 220
Pasadena, California 91103
(626) 793-7395
sandrews@asmaffiliates.com

Attachment A: References
Attachment B: Figures and Photographs
Attachment C: SCCIC Records Search Summary
Attachment D: NAHC Response and Query Letters
Attachment E: Natural History Museum of Los Angeles County Paleontological Records Search

ATTACHMENT A: REFERENCES

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ATTACHMENT B: FIGURES AND PHOTOGRAPHS

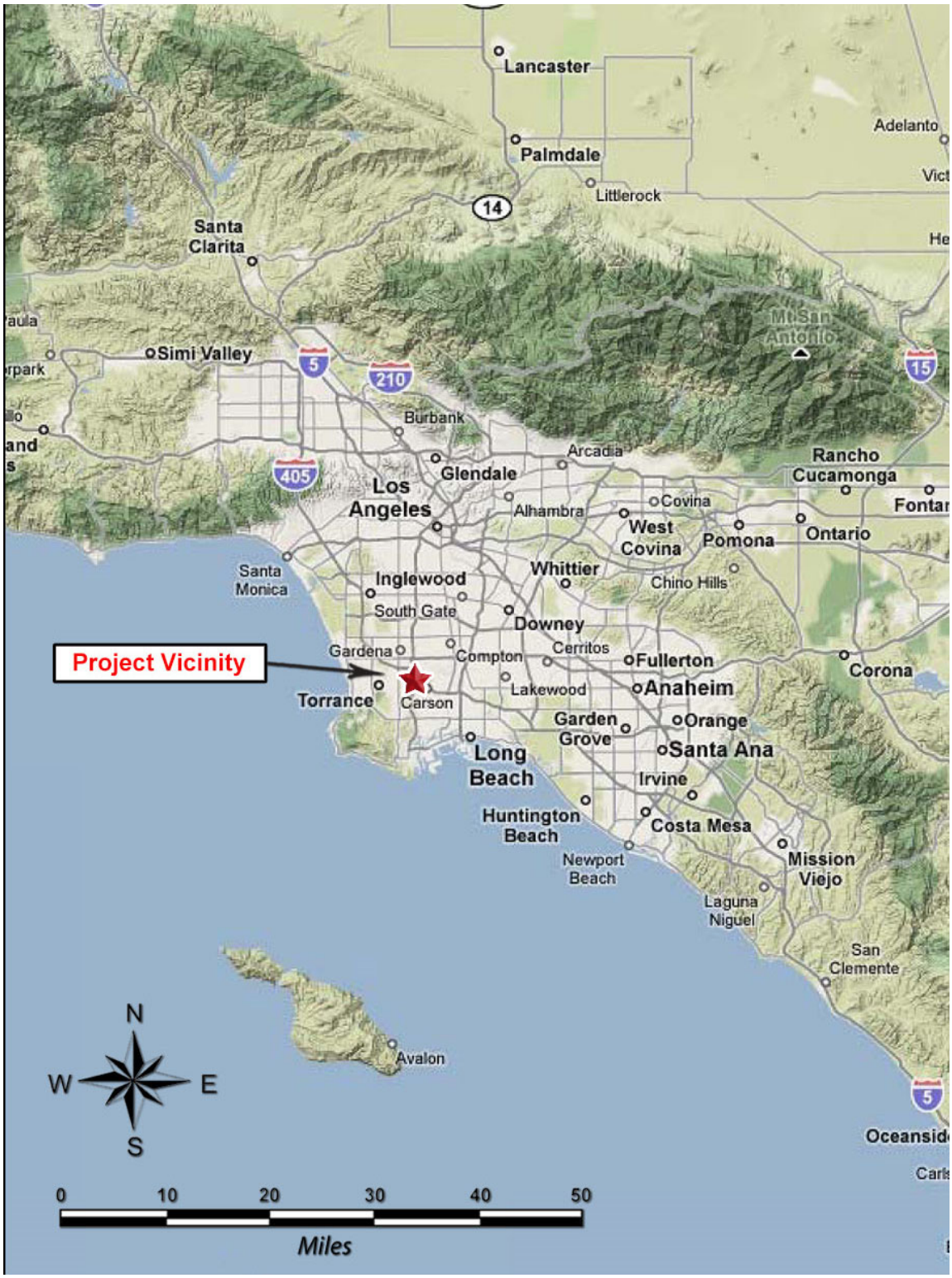


Figure 1. Project vicinity map.

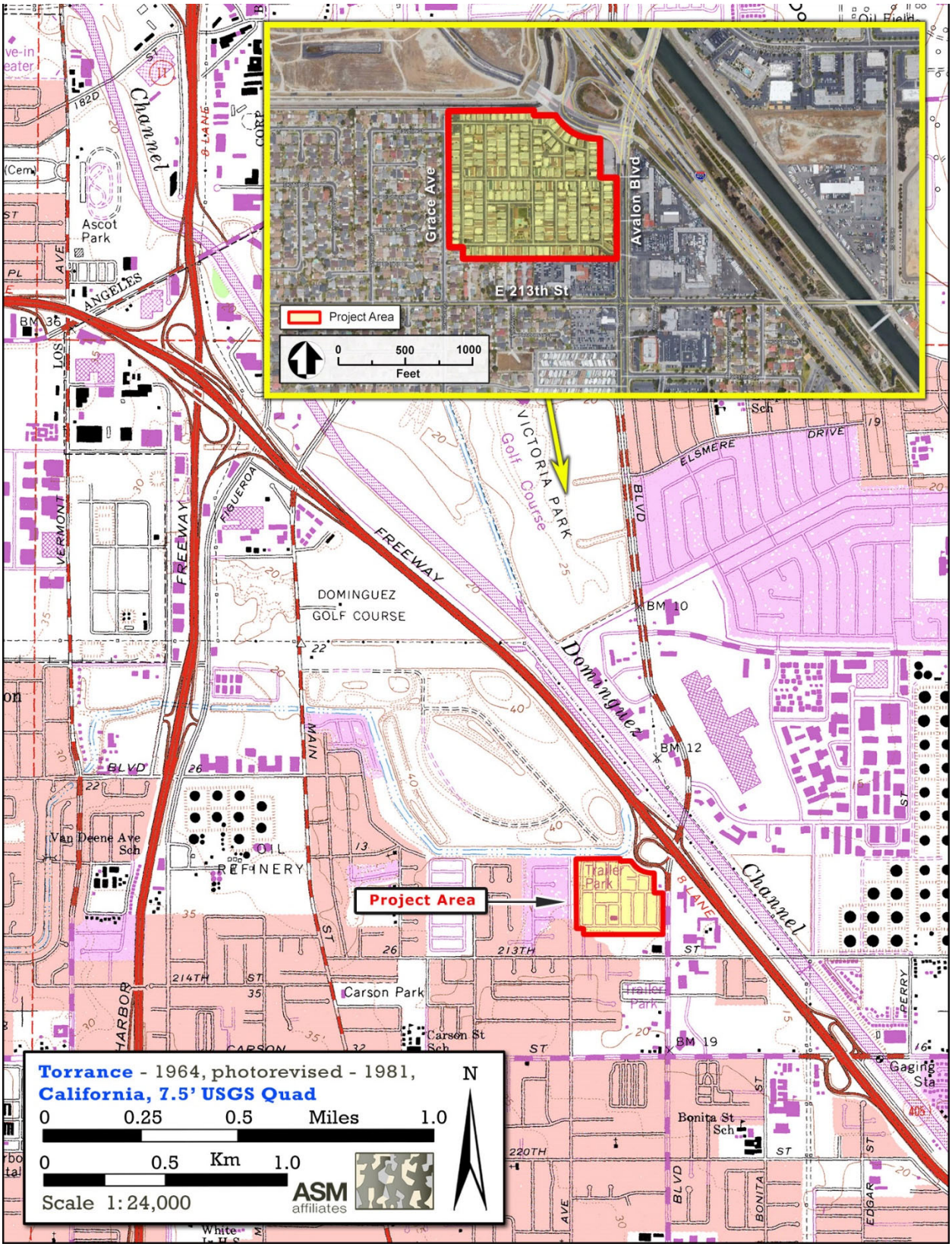


Figure 2. Project location map.



Figure 3. Landscaping along South Avalon Boulevard.



Figure 4. View of subsurface soils.

ATTACHMENT C: SCCIC RECORDS SEARCH SUMMARY

South Central Coastal Information Center
California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395 / FAX 657.278.5542
sccic@fullerton.edu
California Historical Resources Information System
Orange, Los Angeles, and Ventura Counties

9/5/2019 Records Search File No.: 20589.6610

Sherri Andrews
ASM Affiliates, Inc.
20 N. Raymond Av., Ste. 220
Pasadena, CA 91103

Re: Record Search Results for the Avalon Mobile Home Park Cultural Resources Study

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Torrance and Long Beach, CA USGS 7.5' quadrangle. The following reflects the results of the records search for the project area and a 1-mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format: ☒ custom GIS maps ☐ shape files ☐ hand-drawn maps

Resources within project area: 0	None
Resources within 1-mile radius: 4	SEE ATTACHED MAP or LIST
Resources listed in the 2012 OHP Historic Properties Directory within project area: 0	None
Resources listed in the 2012 OHP Historic Properties Directory within 1-mile radius: 20	Delete cell or SEE ATTACHED LIST FOR INDIVIDUAL PROPERTY STATUS CODES – resource locations from the OHP HPD may or may not be plotted on the custom GIS map or provided as a shape file
Reports within project area: 1	LA-04512
Reports within 1-mile radius: 18	SEE ATTACHED MAP or LIST

Resource Database Printout (list):	☒ enclosed	☐ not requested	☐ nothing listed
Resource Database Printout (details):	☐ enclosed	☒ not requested	☐ nothing listed
Resource Digital Database (spreadsheet):	☐ enclosed	☒ not requested	☐ nothing listed
Report Database Printout (list):	☒ enclosed	☐ not requested	☐ nothing listed
Report Database Printout (details):	☐ enclosed	☒ not requested	☐ nothing listed
Report Digital Database (spreadsheet):	☐ enclosed	☒ not requested	☐ nothing listed
Resource Record Copies:	☒ enclosed	☐ not requested	☐ nothing listed
Report Copies:	☒ enclosed	☐ not requested	☐ nothing listed

OHP Historic Properties Directory 2012:	☒ enclosed	☐ not requested	☐ nothing listed
Archaeo Determinations of Eligibility 2012:	☐ enclosed	☐ not requested	☒ nothing listed
Los Angeles Historic-Cultural Monuments	☐ enclosed	☐ not requested	☒ nothing listed
Historical Maps:	☒ enclosed	☐ not requested	☐ nothing listed
Ethnographic Information:	☒ not available at SCCIC		
Historical Literature:	☒ not available at SCCIC		
GLO and/or Rancho Plat Maps:	☒ not available at SCCIC		
Caltrans Bridge Survey:	☒ not available at SCCIC; please go to http://www.dot.ca.gov/hq/structur/strmaint/historic.htm		
Shipwreck Inventory:	☒ not available at SCCIC; please go to http://shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp		
Soil Survey Maps: (see below)	☒ not available at SCCIC; please go to http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx		

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

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

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System,

Isabela Kott
Digitally signed by Isabela Kott
Date: 2019.09.05 15:10:56 -07'00'

Isabela Kott
GIS Technician/Staff Researcher

Enclosures:

(X) Custom Maps – 2 pages

(X) Resource Database Printout (list) – 1 page

(X) Report Database Printout (list) – 2 pages

(X) Resource Record Copies – (all) 12 pages

(X) Report Copies – (project area only) 184 pages

(X) OHP Historic Properties Directory (2012) – 3 pages

(X) National Register Status Codes – 1 page

(X) Historical Maps – 10 pages

ATTACHMENT D: NAHC RESPONSE AND QUERY LETTERS

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

September 23, 2019

Sherri Andrews
ASM Affiliates

VIA Email to: sandrews@asmaffiliates.com

RE: Avalon Mobile Home Park Project, Los Angeles County

Dear Ms. Andrews:

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

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

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

Sincerely,

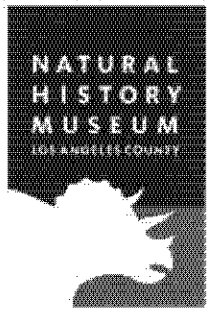
Steven Quinn
Associate Governmental Program Analyst

Attachment

ATTACHMENT E: NATURAL HISTORY MUSEUM OF LOS ANGELES COUNTY PALEONTOLOGICAL RECORDS SEARCH LETTER

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

e-mail: smcleod@nhm.org

2 October 2019

ASM Affiliates, Inc.
2034 Corte del Nogal
Carlsbad, CA 92011

Attn: Sherri Andrews, Director

re: Paleontological resources for the proposed Imperial Avalon Project, ASM Project # 33230, in the City of Carson, Los Angeles County, project area

Dear Sherri:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for the proposed Imperial Avalon Project, ASM Project # 33230, in the City of Carson, Los Angeles County, project area as outlined on the portion of the Torrance USGS topographic quadrangle map that you sent to me via e-mail on 18 September 2019. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have localities nearby from sedimentary deposits similar to those that occur in the proposed project area, either at the surface or at depth.

In the very northwestern portion of the proposed project area there are old lagoonal deposits at the surface, associated with the current Dominguez Channel and the tributaries that fed into it. In the central and eastern portions of the proposed project area there are surface deposits composed of younger Quaternary Alluvium, derived as fluvial deposits from the Dominguez Channel that currently flows immediately to the east and from the Los Angeles River that currently flows a little further to the east of the proposed project area. In the very southwestern portion of the proposed project area the surface deposits consist of older Quaternary Alluvium. The younger Quaternary deposits typically do not contain significant vertebrate fossils in the uppermost layers, but they are underlain by the older Quaternary deposits at varying depths throughout the vicinity, and these latter deposits have produced numerous vertebrate fossil localities.

Northeast of the proposed project area, on the southwestern margin of the Dominguez Hills near the intersection of 190th Street and Annalee Avenue, our older Quaternary locality LACM 1643 produced a fossil specimen of mammoth, *Mammuthus*, at a depth of 8-10 feet below the surface. Southeast of the proposed project area, south of the San Diego Freeway (I-405) and the Dominguez Chanel just west of Wilmington Avenue south of 223rd Street, our older Quaternary locality LACM 1919 produced a specimen of fossil mammoth, *Mammuthus*, from about 10 feet below the surface. Just east of the locality LACM 1919, along both sides of Alameda Street from Carson Street on the north to Sepulveda Boulevard on the south, we have the additional older Quaternary localities LACM 1165, 3319 and 4129. From these localities fossil mammoth, *Mammuthus*, was recovered 30 feet below the surface, fossil camel, Camelidae, was found 24 feet down a bore hole and fossil bison, *Bison*, was discovered at unknown depth. South-southwest of the proposed project area, east of the Harbor Freeway (I-110) and south of Sepulveda Boulevard near the intersection with Figueroa Street, our older Quaternary locality LACM 3823 produced a specimen of fossil camel, *Camelops*, at 12 to 14 feet below street level.

Shallow excavations in the uppermost few feet of the old lagoonal deposits or the younger Quaternary Alluvium deposits in the proposed project area probably will not uncover significant fossil vertebrate remains. Deeper excavations in those portions of the proposed project area that extend down into older Quaternary deposits, however, as well as any excavations in the older Quaternary deposits found at the surface in the southwestern portion of the proposed project area, may well encounter significant vertebrate fossils. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally collect any specimens 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,

Samuel A. McLeod

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice