
**ARCHAEOLOGICAL, PALEONTOLOGICAL, AND TRIBAL
CULTURAL RESOURCES ASSESSMENT REPORT**
for the
425 Mount Holyoke Avenue Project
Pacific Palisades, California

Prepared for:

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1.0 INTRODUCTION

Langan was retained to conduct an archaeological, paleontological and tribal cultural resources assessment in consideration of the proposed 425 North Mount Holyoke Avenue Project (Project), located in the neighborhood of Pacific Palisades, Los Angeles County, California (see Figure 1, Site Vicinity Map). The purpose of this assessment is to identify known archaeological, paleontological and tribal cultural resources within the proposed Project site and surrounding area; to assess the potential for unknown resources to exist; and to determine, pursuant to the California Environmental Quality Act (CEQA), the potential for the proposed Project to significantly impact these resource types. Langan understands that the City of Los Angeles (City) is the lead agency requiring this assessment of the proposed Project for purposes of CEQA compliance.

This assessment has been conducted to meet the requirements outlined in the *2021-2029 Citywide Housing Element Streamlining Checklist Form* (Form) and in accordance with the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report Mitigation Monitoring Program* (MMP). Accordingly, this report satisfies the assessment requirements for archaeological and paleontological resources outlined in the mitigation measures 4.4-2 Archaeological Resources and 4.5-1(a) Paleontological Procedures for Discretionary Projects and the assessment and tribal notification requirements for tribal cultural resources in mitigation measure 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects.

This report includes the following components in consideration of the proposed Project site and surrounding areas in relation to proposed construction and site improvements: (1) summary of the geotechnical study findings and general environmental conditions; (2) summary of the Natural History Museum of Los Angeles County (MNHLA) paleontological collections database records search results; (3) summary of the California Historical Resources Information System (CHRIS) database records search results employing a 1-mile search radius; (4) summary of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search results; (5) summary of the historic aerial photographs and topographic maps review findings; (6) results of the intensive-level pedestrian survey of the proposed Project site; (7) summary of archival document review findings; (8) assessment of the potential for the proposed Project site to contain archaeological, paleontological and tribal cultural resources; (9) an assessment of potential impacts to archaeological, paleontological and tribal, and human remains in accordance with CEQA, and (10) management recommendations. This study was conducted by Langan's cultural and paleontological resources staff overseen by Practice Director, Heather McDaniel McDevitt, who exceeds the Secretary of the Interior standards for a principal investigator knowledgeable in pre-contact and post-contact archaeology with over 20 years' experience conducting archaeological investigations within the southern California region where the proposed Project site is located. The paleontological resource component of this assessment was overseen by Daniel Danehy who meets the Society of Vertebrate Paleontology (SVP) Standards.

2.0 PROJECT DESCRIPTION

The proposed Project involves the construction of a new three-story, duplex (SFD + SB9 unit) 12,872 square foot (ft)residential structure including an attached garage, pool/spa, decks, attached trellis, and retaining walls (see Site Plan). Construction would be preceded by grading and terracing across the site to depths of 25 feet below ground surface for the building structure with an additional 50 feet below the structure for installation of caissons with a total export of 1,950 cubic yards of soils. Construction of the structure would occur within graded soils with the exception of caisson installation requiring disturbance of no greater than fifty (50) feet below the finished grade. Similarly, installation of the pool/spa, utilities and landscaping will occur within graded soils.

3.0 PROJECT SITE CHARACTERISTICS

3.1 Project Location and Present Land Use

The proposed Project site is located at the property (Assessor's Identification number No [AIN] 4412-015-011) addressed as 425 North Mount Holyoke Avenue (see Figure 1) and is portrayed on the public land survey system (PLSS) *Topanga* U.S. Geological Survey 7.5-minute quadrangle map, Township 1 South, Range 16 west, and Section 35. The proposed Project site is currently undeveloped land and bound by developed residential properties on the north and south, Mount Holyoke Avenue on the east, and Temescal Canyon Park on the west. Generally, the surrounding area is developed with large single-family residences with community green spaces interspersed.

3.2 Environmental Setting

The approximately 1-acre proposed Project site is located within the southwestern portion of Pacific Palisades and includes approximately 100 vertical feet of relief within a 1.25:1 to 1.5:1 (horizontal: vertical) descending hillside along the western half of the property. The proposed Project site is approximately 323 meters (1,060 feet) north of the Pacific Ocean and adjacent to Temescal Canyon along its western boundary. The residential neighborhood, within which the proposed Project is located, is comprised of properties that have been graded within the generally undulating topography of the Santa Monica Mountains foothills. More broadly, the proposed Project site is within the upper reaches of California's Peninsular Ranges geomorphic province, which extends from the Channel Islands inland to the Colorado Desert and south to lower California. The Peninsular Ranges geomorphic province includes the Los Angeles Basin, a coastal lowland area bound by the Santa Monica Mountains and Santa Susana Mountains to the north, the San Gabriel and San Bernardino Mountains to the northeast, and the Santa Ana Mountains to the east.

The nearest freshwater sources is Temescal Creek approximately one mile to the northwest. The natural vegetation within the proposed Project site and vicinity prior to European colonization

would have consisted of lemonade berry, ashy buckwheat, black sage, giant wildrye (*Elymus condensatus*), California brittle bush, California sagebrush, laurel sumac (*Malosma laurina*), coyote brush (*Baccharis pilularis*), deer weed (*Acmispon glaber* var. *glaber*), laurel sumac, and nodding needlegrass (*Stipa cernua*) (Calflora 2020).

3.3 Soil and Topography

The proposed Project site is situated within the southern portion of the Santa Monica Mountains, near the southern boundary of the peninsular and Transverse Ranges Geomorphic Provinces (Tomlin et al. 2023). Detailed regional mapping (McGill 1989) of the general Project area defines the area as middle Miocene Topanga bedrock units within interbedded conglomerate and siltstone/sandstone Topanga sediments. Native soils within the proposed Project area and elevation are considered Older Non-Marine Terrace Deposits found at a maximum depth of 40 feet below the surface within the proposed Project site. These soils are Upper Pleistocene alluvial fan deposits and include locally undifferentiated marine-terrace deposits at base, and talus and other colluvial deposits adjacent to buried sea cliffs (McGill 1989). Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. The soils identified within the proposed Project site and surrounding area are associated with a period of precontact human use although near the early terminus of the period.

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2024a) has identified the following soil types and percentages within the proposed Project site: Urban land-Sepulveda-Pierview complex in 2-12 percent slopes accounting for approximately 57 percent, and Chumash Boades-Malibu association in 30-75 percent slopes accounting for approximately 43 percent. The associated soil series are described in the NRCS Web Soil Survey as follows:

- **Sepulveda Series** (USDA 2024b): well drained soils formed in human-transported material (HTM) found on alluvial fan remnants that originate from sedimentary sources. Found within cut/fill and localized raised land in areas that have been graded. Typical Sepulveda series extends from 0 to 200 centimeters (cm) below ground surface (bgs).
- **Pierview Series** (USDA 2024b): well drained soils formed in alluvium weathered from slate and other sedimentary sources. Found on remnant alluvial fans and terraces, often in urban areas where surface modification is common. Typical Pierview series extends from 0 to 185 cm bgs.
- **Chumash Series** (USDA 2024b): very shallow and shallow to soft bedrock, well drained soils formed in residuum and colluvium derived from shale and sandstone. Found on hills and mountains. Typical Chumash series extends from 0 to 55 cm bgs.

- **Boades** (USDA 2024b): shallow to soft bedrock, well drained soils formed in residuum and colluvium derived from bedded shale and sandstone. Found on hills and mountains. Typical Boades series extends from 0 to 150 cm bgs.
- **Malibu** (USDA 2024b): moderately deep to soft bedrock, moderately well drained soils formed in residuum and colluvium derived from inter-bedded shale and sandstone. Found on hills and mountains. Typical Malibu series extends from 0 to 150 cm bgs.

3.4 Geotechnical Report Review

The geotechnical report, *Preliminary Geotechnical Investigation for Residential Development 425 N. Mount Holyoke Avenue Los Angeles, California 90272 APN: 441-201-5011* (Tomlin et al. 2023), details the results of subsurface explorations within the proposed Project site, performed by Stony Miller Consultants, Inc in August 2023.

Stony Miller Consultants, Inc conducted field exploration consisting of three (3) 24-inch diameter bucket-auger borings employing a limited-access hillside drilling rig. The borings were excavated to a depth of 51 feet below grade. The following soils were documented in Stony Miller Consultants, Inc's boring logs:

- **Artificial (undocumented) fill:** was encountered in all borings and was found from surface to a minimum depth of 8 feet and a maximum depth of 11 feet below ground surface. Deeper fill soils were encountered at the top of the slope at an elevation of approximately 280 feet. These soils were generally Clayey Sand and Sandy Clay with fine-grained sand, brown to reddish brown, moist, medium stiff, with trace gravels.
- **Older Non-Marine Terrace Deposits:** found below fill soils to maximum depths ranging between 14 feet and 40 feet below ground surface. These soils were documented as Sandy Gravel, Sand, Sandy Clay, Clayey Sand, and Clayey Silt.
- **Bedrock:** found below terrace deposits and consists of Monterey Formation Siltstone. The surface of the bedrock was encountered at depths ranging from 14 feet to 40 feet below ground surface. The deepest level of bedrock was encountered at an elevation of approximately 280 feet, and the shallowest level of bedrock was encountered at an elevation of approximately 254 feet.

The report also references previously conducted geotechnical investigations performed in 1977 by Kovacs-Byers and Associates, Inc; in 1990 by G.C. Masterman & Associates, Inc. & Subsurface Designs, Inc; and in 2023 by Earth Systems. According to the boring logs from the 1977 investigation, fill soils were encountered to depths ranging from 1.5 feet to 4 feet below ground surface. The results of both the most recent geotechnical studies conducted in 2023 (Earth Systems 2023; Stony Miller Consultants and Subsurface Designs, Inc. 2023.) and the older

study (G.C. Masterman & Associates, Inc 1990) demonstrate that the potential to encounter native soils within areas where construction will occur is unlikely between the surface and eight feet below the current ground surface due to the presence of documented fill. Additionally, the native soils that are present are derived from non-marine terrace deposits that have been transported due to landslide activity including in the modern-era as demonstrated by the significant increase in the move of soils from 1977 to 2023. It should be noted that the presence of native geologic materials does not necessarily indicate intact, undisturbed native soil with respect to the potential of encountering intact archaeological deposits. Colluvium, slopewash/graben debris, and ancient or modern landslide debris are naturally occurring soil deposits but have been transported and redeposited and therefore have very low potential for possessing intact archaeological deposits.

4.0 REGULATORY CONTEXT

4.1 Federal Regulations

The proposed Project does not have a federal nexus and therefore is not subject to Federal regulations.

4.2 State Regulations

The California Environmental Quality Act

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

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

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

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (California Public Resources Code Section 21083.2). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (California Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); California Public Resource Code Section 5020.1(q)). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

1. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of

PRC Section 5024.1(g) Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

3. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings is considered to have impacts that are less than significant (CEQA Guidelines Section 15064.5(b)(3)).

The California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1(a)). The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria (California Public Resources Code Section 5024.1(b)). Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

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

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

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

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

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

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

California Health and Safety Code Section 7050.5

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

California Public Resources Code (PRC)

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted

access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

4.3 Local

City of Los Angeles General Plan – Conservation Element

The City of Los Angeles General Plan includes a Conservation Element. Section 3 of the Conservation Element, adopted in September 2001, includes policies for the protection of archaeological resources. As stated therein, it is the City's policy that archaeological resources be protected for research and/or educational purposes. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes (City of Los Angeles 2001).

In addition to the National Register and the California Register, two additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument (HCM)
2. Classification by the City Council as a Historic Preservation Overlay Zone (HPOZ)

Of these two additional types of historic designations, only one, HCM, is applicable for the purposes of this archaeological study and is therefore further explained below.

Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monuments (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):

An HCM 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 archaeological 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 the following four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria and are numbered for clarity:

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

Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

Brentwood-Pacific Palisades Community Plan

Land Use Policies and Programs – Preservation of Historic and Cultural Amenities

GOAL 17. Preservation and Restoration of Monuments, Cultural Resources, Neighborhoods and Landmarks Which Have Historical and/or Cultural Significance.

Objective 17-1. To ensure that the Plan Areas significant cultural and historical resources are protected, preserved and/or enhanced.

Policies 17-1.1 Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public.

Program: The plan includes in the Appendix, a complete list of sites which have been designated by the Los Angeles City Council as Historic and Cultural Monuments in the Brentwood-Pacific Palisades Community Plan Area. In addition through inclusion of the Plan policy, the Plan supports the continued identification of appropriate landmarks.

17-1.2 Protect and preserve archaeological sites of Native Americans.

Program: Support studies to identify and protect archaeological resources and landmarks.

City of Los Angeles City Planning Chapter I Environmental Protection Measures Handbook

A. Archaeological Resources

The following best practices are recognized by archaeologists and environmental consultants to ensure archaeological resources are not damaged during grading, excavation, or other Ground Disturbance Activities:

1. Records Search. A cultural resources records search should be requested from and conducted by the California Historical Resources Information System's (CHRIS) South Central Coastal Information Center (SCCIC) located at California State University, Fullerton to determine whether any cultural resources have been previously identified on or within a 0.5-mile radius of the Project site. The results of this records search shall be used as an indicator of the archaeological sensitivity of the Project site.
2. A Qualified Archaeologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for archaeological resources to be present on the Project site.
3. If the Qualified Archaeologist determines there is a medium to high potential that archaeological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Archaeologist shall advise the Applicant and Owner to retain an Archaeological Monitor to observe all Ground Disturbance Activities within those areas identified as having a medium to high potential in order to identify any resources and avoid potential impacts to such resources.
4. Monitoring. An Archaeological Monitor should monitor excavation and grading activities in soils that have not been previously disturbed in order to identify and record any potential archaeological finds and avoid potential impacts to such resources. In the event of a possible archaeological discovery, the Archaeological Monitor shall notify a Qualified Archaeologist. The Archaeological Monitor has the authority to temporarily halt earthwork activities.
 - a. Handling, Evaluation, and Preservation. Any archaeological resource materials or associated materials that are uncovered shall not be moved or collected by anyone other than an Archaeological Monitor or Qualified Archaeologist unless they have been determined to be nonunique archaeological resources, as defined in Public Resources Code Section 21083.1(h) by a Qualified Archaeologist. A Qualified Archaeologist shall determine if the resources are unique archeological resources

as defined in Public Resources Code Section 21083.2(g).

5. Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of unique archaeological resources should occur as follows:
 - a. a. The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource.
 - b. b. When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Archaeologist.
6. If recommended by the Qualified Archaeologist, the resource(s) shall be curated by a public, non-profit institution with a research interest in the material, such as the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes.
7. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a Qualified Archaeologist.

C. Paleontological Resources

The following best practices are recognized by paleontologists and environmental consultants to ensure paleontological resources are not damaged during construction or Ground Disturbance Activities:

1. A paleontological resources records search shall be requested from and conducted by the Natural History Museum of Los Angeles County to determine whether any paleontological resources have been previously identified on or near the Project site. The results of this records search shall be used as an indicator of the paleontological sensitivity of the Project site.
2. A Qualified Paleontologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for paleontological resources to be present on the Project site.
3. If the Qualified Paleontologist determines there is a high potential that paleontological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Paleontologist or his/her designated representative

such as a Paleontological Monitor shall observe all Ground Disturbance Activities within those areas identified as having an undetermined or high potential in order to identify any resources and avoid potential impacts to such resources. In the event of a possible paleontological discovery, the Qualified Paleontologist or Paleontological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Paleontologist, necessary to protect the resource or other potential resources on or near the Project site. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment.

4. Prior to the start of construction, the Qualified Paleontologist or his/her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.
 - a. If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the area of the find until a Qualified Paleontologist has evaluated the find in accordance with federal, state, and local guidelines, including the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP, 2010).
 - b. If fossils are discovered, a Qualified Paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist has the authority to temporarily direct, divert or halt construction activity to ensure the fossil(s) can be removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a Qualified Paleontologist.
 - c. Personnel of the Project should not collect or move any paleontological materials or associated materials.
 - d. If cleared by the Qualified Paleontologist, construction activity may continue unimpeded on other portions of the Project site.
 - e. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Qualified Paleontologist, and the Qualified Paleontologist clears the site for construction activity.

D. Tribal Cultural Resources

The following best practices are recognized by tribal monitors and environmental consultants to ensure that tribal cultural resources are not damaged during grading, excavation, or other Ground Disturbance Activities:

1. A Sacred Lands File (SLF) records search shall be requested from and conducted by the California Native American Heritage Commission (NAHC) to determine whether cultural resources associated with any Native American tribe(s) with traditional lands or cultural places located within or near the Project site have been previously identified or whether the Project area is considered sensitive for the presence of tribal cultural resources.
2. All tribes listed on the NAHC's Native American Contact List included with the SLF records search shall be contacted, informed of the Project, and given an opportunity to provide input. If the tribe provides substantial evidence of a potential for discovery of tribal cultural resources within the Project site and requests monitoring of Project excavation, grading or other Ground Disturbance Activities, a Qualified Tribal Monitor or an Archaeological Monitor shall be retained.
3. The Qualified Tribal Monitor or Archaeological Monitor shall observe all Ground Disturbance Activities within those areas identified in the records search as sensitive for the presence of tribal cultural resources in order to identify any resources and avoid potential impacts to such resources. In the event of a possible discovery of a tribal cultural resource, the Qualified Tribal Monitor or Archaeological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Tribal Monitor or Qualified Archaeologist to ensure the find is not damaged or any other potential tribal cultural resources on or near the Project site.
4. If tribal cultural resources are uncovered, all work should cease in the appropriate radius determined by the Qualified Tribal Monitor or Archaeological Monitor.
5. Any find should be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Qualified Tribal Monitor and in accordance with federal, state, and local guidelines.
6. The location of the tribal cultural resource find and the type and nature of the find should not be published beyond providing the information to public agencies with jurisdiction or responsibilities related to the resources and any affected tribal representatives.
7. Personnel of the Project should not collect or move any tribal cultural resources or associated materials or publish the location of tribal cultural resources.

8. Following discovery, the Applicant or Owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area of the Project, as well as the Department of City Planning, Office of Historic Resources (OHR).
9. The Applicant and Owner shall provide any affected tribe a reasonable period of time, not less than fourteen calendar days, to conduct a site visit and make recommendations to the Applicant or Owner regarding the monitoring of future Ground Disturbance Activities and the treatment and disposition of any discovered tribal cultural resources.
10. The Applicant or Owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archaeological Monitor reasonably concludes such recommendations are reasonable and feasible and determined to be supported with substantial evidence.
11. Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources shall occur as follows:
 - a. The find shall be preserved in place or left in an undisturbed state unless the Project would damage the resource.
 - b. When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study shall occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Qualified Archaeologist.
 - c. All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History Museum of Los Angeles County or another appropriate curatorial facility.
 - d. If cleared by the Qualified Tribal Monitor or Archaeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed.

Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report Mitigation Monitoring Program

Updates to the City of Los Angeles General Plan Housing Element and Safety Element were made in support of the City's goal of meeting the existing and projected housing needs; provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment allocation through the year 2029; and identify a Rezoning Program to reach the required housing

capacity. The Safety Element integrates related long-range planning efforts to ensure compliance with State law and includes a related technical amendment to the Plan for a Healthy Los Angeles to clarify consistency with State (SB 1000) law. The Mitigation and Monitoring Program can be found at the link below and include those measures applicable to archaeological resources (4.2-2), paleontological resources (4.5-1a-4.5-1d), and tribal cultural resources (4.15-1a-4.15-1b).

https://planning.lacity.gov/odocument/f27f0c78-44c4-4c06-a68d-3da7a64e95a8/FD_Housing_Element_EIR_Mitigation_Monitoring_Program_072125.pdf

5.0 BACKGROUND RESEARCH

5.1 California Historical Resources Information System Record Search Results

A search of the CHRIS database, stored at the South Central Coastal Information Center (SCCIC), located on the campus of California State University Fullerton, was conducted in 2020 to identify and retrieve for review any previously recorded cultural resources and investigations within a 1-mile radius of the proposed Project site. A supplemental records search employing a 0.5-mile radius was conducted in October 2024 capturing any newly submitted reports and site records. This record analysis also included a review of the National Register of Historical Places (NRHP), California Register of Historical Resources (CRHR), California Points of Historical Interest list, California Historical Landmarks list, Archaeological Determinations of Eligibility list, and California State Historic Resources Inventory list. The results of this search are provided in Confidential Attachment B.

Previously Conducted Cultural Resource Investigations

Results of the CHRIS database records search indicate that at thirty-seven (37) previously submitted cultural resource studies have been conducted within the records search area between 1979 and 2013. None these studies are mapped as having addressed any portion of the proposed Project site; the closest property studied is located approximately 48 meters (158 feet) west of the proposed Project site. Table 1 summarizes all previously submitted cultural resources studies conducted within 1-mile of the proposed Project site.

Table 1. Previous Technical Studies Within a 1-Mile Radius of the Proposed Project Site

CHRIS Report Number	Authors	Date	Report Title	Proximity to Proposed Project Site
LA-00457	Walsh, Michael R.	1979	Evaluation of the Archaeological Resources and Potential Impact of Proposed Tract 9300, a Portion of Lot A, 15555 Sunset Boulevard, Los Angeles	Outside
LA-00577	Walsh, Michael R.	1979	Assessment of the Impact of Development on Archaeological Resources	Outside

CHRIS Report Number	Authors	Date	Report Title	Proximity to Proposed Project Site
LA-00579	Bernor, Raymond L.	1979	Archaeological Resource and Impact Evaluation for the Presbyterian Conference Grounds, Los Angeles County, California	Outside
LA-00656	Padon, Beth	1979	An Archaeological Reconnaissance of 16551 Sunset Blvd. Pacific Palisades, Los Angeles County	Outside
LA-00827	Love, Bruce	1980	Archaeological Resource Survey of Rustic Canyon, Pacific Palisades	Outside
LA-01077	Schrider, Jaes E.	1981	Cultural Resource Evaluation: Palisades Preparatory School 100 Marquez Place, Pacific Palisades	Outside
LA-01485	Berger, Louis	1985	Surface Survey and Limited Subsurface Testing for Cultural Resources in Direct Impact Areas, Lower Temescal Canyon Park, Pacific Palisades, California	Outside
LA-01538	Dillon, Brian D.	1986	Malibu Wastewater Facilities Plan: Archaeological Analysis Survey Report	Outside
LA-01580	Woodward, Jim	1985	Archaeological Survey Report: Will Rogers State Beach	Outside
LA-01675	Van Horn, David M.	1984	Archaeological Survey Report: The Presbyterian Conference Grounds in Temescal Canyon, Los Angeles	Outside
LA-01759	Singer, Clay A. and John E. Atwood	1989	Cultural Resources Survey and Impact Assessment for a Portion of Pulga Canyon in Pacific Palisades, Los Angeles County, California	Outside
LA-01794	Wlodarski, Robert J.	1989	Archaeological Reconnaissance Report for the Proposed Sunset Pumping Plant and Force Main Project, Pacific Coast Highway, Los Angeles County, California.	Outside
LA-02030	Rice, Glen E.	1974	Riviera Oil Drilling Districts and Alternate Proposed Drilling Sites Occidental Petroleum Corporation	Outside
LA-02309	Wlodarski, Robert J.	1991	Addendum Archaeological Reconnaissance Report for the Sunset Pumping Plant and Pressurized Gravity Sewer/common Force Main Project, Pacific Coast Highway, Los Angeles County, California	Outside
LA-02419	Larson, Dan A.	1991	Report of Monitoring, Pacific Coast Highway at Entrada Drive Pacific Palisades, California	Outside
LA-02565	Walter, Nancy	1980	Draft Environmental Impact Report Area 4 Alternative School Temescal Canyon Site State I.D. #(sch) 79110111	Outside

CHRIS Report Number	Authors	Date	Report Title	Proximity to Proposed Project Site
LA-03434	Demcak, Carol R.	1996	Report of Archeological Survey for L.A. Cellular Site #180orl, 15415 1/2 W. Sunset Boulevard, Suite 270, Pacific Palisades, Los Angeles County	Outside
LA-03787	Clement, Dorene	1996	Historic Architectural Survey Report: Slope Stabilization Project, Pacific Palisades, Los Angeles, Los Angeles County, 07-la-01, P.m. 37.3 07-4c1901	Outside
LA-03801	Jertberg, Patricia R.	1997	Prehistoric and Historic Cultural Resource Assessment for the Unsurveyed Portion of the Proposed Pacific Coast Highway Bike Pathway Extension, Will Rogers Beach State Park, Pacific Palisades, Los Angeles County, California	Outside
LA-04017	McLean, Deborah K.	1998	Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 856-01, 16600 1/2 Sunset Boulevard, City and County of Los Angeles, California	Outside
LA-04409	Duke, Curt	1999	Cultural Resource Assessment for the At&t Wireless Services Facility Number R121, Located at 1505 1/2 Pacific Coast Highway, City of Pacific Palisades, County of Los Angeles, California	Outside
LA-04505	Brown, Joan C.	1998	Archaeological Monitoring of Excavations at 715 Plymouth Road, Claremont, Los Angeles County, California	Outside
LA-04585	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 753-01, County of Los Angeles, California	Outside
LA-04707	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 411-16, County of Los Angeles, California	Outside
LA-04824	Foster, John M.	1999	Cultural Resources Investigation for the Temescal Canyon Sewer Replacement Project, City of Los Angeles Los Angeles County, California	Outside
LA-04985	Messick, Peter and Roberta S. Greenwood	2000	Archaeological Monitoring and Burial Recovery Temescal Canyon Sewer Replacement Project	Outside
LA-06921	Harper, Caprice D.	2003	Cultural Resource Assessment Cingular Wireless Facility No. Sm 001-02 Pacific Palisades, Los Angeles County, California	Outside
LA-07841	Sylvia, Barbara	2001	Project Proposes to Construct Curb Ramps at Various Locations on Pacific Coast Highway From Pier Avenue to Topanga Canyon Boulevard and on Route 27 Mulholland Drive	Outside

CHRIS Report Number	Authors	Date	Report Title	Proximity to Proposed Project Site
LA-08869	Bonner, Wayne H.	2006	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate Sv11081b (Ralph's Market), 15120 West Sunset Boulevard, Pacific Palisades, Los Angeles County, California	Outside
LA-09274	K. Ross Way	2008	Archaeological Investigation for Proposition O and CIS Projects City of Los Angeles, Los Angeles County, California	Outside
LA-09905	Monica Strauss	2008	Phase I Archaeological Resources Survey for the Temescal Canyon Park Stormwater Best Management Practices Project, City of Los Angeles, CA	Outside
LA-09907	Wayne H. Bonner	2008	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11089E (Best Friends JPA), 15239-1/2 Friends St., Pacific Palisades, Los Angeles County, California	Outside
LA-10097	Bonner, Wayne H.	2006	Cultural Resources Records Search Results and Site Visit for T-Mobile Candidate Sv11080b (jpa Pole #gt142542), 710 Liff Street, Los Angeles, Los Angeles County, California.	Outside
LA-10101	Foster, John M.	2003	Archaeological Monitoring for the Low Flow Diversion Project.	Outside
LA-11606	Maxon, Patrick	2011	Phase I Cultural Resources Assessment, Sylmar Ground Return Replacement Project, Los Angeles County, California	Outside
LA-11967	Bonner, Wayne H. and Kathleen A. Crawford	2012	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAC180 (LAC180-Pacific Palisades), CASPR No.3551278719, 15415 Sunset Boulevard, Pacific Palisades, Los Angeles County, California	Outside
LA-12464	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00387A (LA387 Palisades/Goldstein), 910 Vis de la Paz, Pacific Palisades, Los Angeles County, California	Outside

Previously Recorded Cultural Resources

The CHRIS records indicate that fifteen (15) cultural resources have been previously recorded within 1-mile of the proposed Project site, none of which are located within the proposed Project site. The identified cultural resources include two (2) precontact archaeological sites and thirteen (13) historic built environment resources. Table 2 summarizes all previously recorded cultural resources identified within the records research radius followed by brief summaries of each

archaeological resource located within the records search radius.

Table 2. Cultural Resources Recorded within a 1-Mile Radius of the Proposed Project Site

CHRIS Resource Designation	Resource Type, Age, Description	Recorded By	NRHP/ CRHR Eligibility	Approximate Distance from Proposed Project Site
P-19-000135 (CA-LAN-000135)	Precontact site containing shell, (potentially modern)	(Nelson, N.C.)	Not Evaluated	1,340 meters (4,396 ft.) southeast
P-19-000224 (CA-LAN-000224)	Precontact site containing shell and chipped stone	1960 (B. Greenwood); 1979 (Michael Walsh and M.D. Rosen); 1985 (A.V. Eggers, Louis Berger & Assoc.)	Not Evaluated	1,510 meters (4,954 ft.) northeast
P-19-150448	Built Environment, single-family residence	1996 (D. Clement, Caltrans)	6Y: Determined ineligible for NRHP; Section 106 process concurred.	895 meters (2,936 ft.) southeast
P-19-150449	Built Environment, single-family residence	1996 (D. Clement, Caltrans)	6Y: Determined ineligible for NRHP; Section 106 process concurred.	940 meters (3,084 ft.) southeast
P-19-173144	Built Environment, Old Santa Monica Forestry Station	1980 (J. Arbuckle)	CRHL No. 840*; not listed on NRHP	1,315 meters (4,314 ft.) east
P-19-175994	Built Environment, single-family residence	1994 (C. McAvoy, HRG)	6Y: Determined ineligible for NRHP; Section 106 process concurred.	1,190 meters (3,904 ft.) southeast
P-19-176007	Built Environment, commercial building	1994 (C. McAvoy, HRG)	6Y: Determined ineligible for NRHP; Section 106 process concurred.	1,585 (5,200 ft.) southeast
P-19-186570	Built Environment, site of Port of Los Angeles Long Wharf	1980 (J. Arbuckle)	CRHL No. 881*; not listed on NRHP	790 meters (2,592 ft.) southeast

CHRIS Resource Designation	Resource Type, Age, Description	Recorded By	NRHP/ CRHR Eligibility	Approximate Distance from Proposed Project Site
P-19-189449	Built Environment, Eames House	2005 (Christy McAvoy et al, Historic Resources Group); 2011	Listed on NRHP	1,410 meters (4,626 ft.) southeast
P-19-190095	Built Environment, commercial building	2012 (K. A. Crawford, Crawford Historic Services)	Does not appear eligible for NRHP; not evaluated for CRHR or Local Listing	1,140 meters (3,740 ft.) northeast
P-19-190508	Built Environment, SCE Walnut-Hillgen-Industry-Mesa-Reno 66kV Transmission Line	2010 (Wendy L. Tinsley Becker, Urbana Preservation & Planning); 2018 (Audrey von Ahrens, GPA)	6Z: Found ineligible for NRHP, CRHR or Local designation through survey evaluation	1,435 meters (4,708 ft.) southeast
P-19-190571	Built Environment, Case Study house No. 18	2013 (Edson Beall, NPS)	Listed on NRHP	1,485 meters (4,872 ft.) southeast
P-19-190648	Built Environment, commercial building	2013 (K.A. Crawford, Crawford Historic Services)	Does not appear eligible for NRHP; not evaluated for CRHR or Local Listing	1,065 meters (3,494 ft.) northeast
P-19-192468	Built Environment, single-family residence	2017 (Margarita Jerabek, ESA)	6Z: Found ineligible for NRHP, CRHR or Local designation through survey evaluation	815 meters (2,674 ft.) southeast
P-19-192763	Built Environment, wooden utility pole	2016 (K.A. Crawford)	Does not appear eligible for NRHP or CRHR	1,410 meters (4,626 ft.) northwest

* CRHL = California Registered Historical Landmark

P-19-000135 (CA-LAN-000135)

P-19-000135 is a precontact site located approximately 1,340 meters (4,396 ft.) southeast of the proposed Project site; no measurements of the site are provided in the site record. The site was formally recorded by N.C. Nelson; no additional recordings appear to have been conducted. In his site recording, Nelson describes the site as “No. 3 traces of a camp site”. The resource is recorded as containing shell and refuse with a note that the material may have been deposited by more contemporary nonindigenous populations. Based on the site record, the resource has not been assessed employing subsurface testing nor has it been evaluated for listing on the CRHR or NRHP.

P-19-000224 (CA-LAN-000224)

P-19-000224 is a precontact archaeological resource measuring approximately 30 meters by 30 meters (98 ft. by 98 ft.) at an elevation ranging from 325 ft. to 350 ft. and is located approximately 1,510 meters (4,954 ft.) northeast of the proposed Project site. The site was originally formally recorded by B. Greenwood in 1960 who documented the site as measuring 5.2 meters by 21.3 meters (17 ft. by 70 ft.) with a potential depth of at least 60 centimeters (24 in) below the surface at the time of survey. Greenwood described the resource as consisting of shell, mammal bone, and one possible groundstone object noting that the resource was eroding out of a slope and that further exploration should be conducted in the “upper reaches of the canyon” to better delineate the resource’s extent. The site record for P-19-000224 was updated by Michael Walsh and M. D. Rosen in 1979 who expanded the site boundary to 30 meters by 30 meters (98 ft. by 98 ft.) and documented the resource as an “open air camp site” consisting of a light scatter of shell and lithic artifacts. The disturbance of the resource in 1979 was considered extensive due to conference grounds and road construction. Based on the site record, the resource has not been assessed employing subsurface testing nor has it been evaluated for listing on the CRHR or NRHP.

5.2 Paleontological Records Search Results

A search of the Natural History Museum of Los Angeles County (NHMLA) database of the closest known fossil localities relative to the proposed Project site was requested to determine if the project site is underlain by documented paleontological resources or by soils or geologic units potentially containing paleontological resources. The NHMLA records indicate that no fossil localities have been documented as lying directly within the proposed Project site. However, nearby paleontological resource localities have been recorded in the surrounding area and within the same sedimentary deposits that have the potential of occurring within the proposed Project, either at the surface or at depth. Table 3 lists the documented fossil localities in the NHMLA collection nearest the proposed Project site.

Table 3. Paleontological Resource Localities Present Near the Project Site (NHML 2025)

Locality Number	Location	Formation	Taxa	Proximity and Depth
LACM IP 4848	South of Bowdoin St in Temescal Canyon	Unknown formation (Pleistocene)	Barrel-bubble snail (<i>Sulcularia xystrum</i>)	0.5 mile to the north; depth - unknown
LACM VP 6384; LACM IP 21517, 4472, 21516, 4526, 7696	Mouth of Temescal Canyon	Unknown formation (Late Pliocene; coarse-grained sandstone; alternately identified in collections as Pico or San Diego formations)	White shark (<i>Carcharodon carcharias</i>), Invertebrates (<i>Echinoidea</i> , <i>Dendraster</i> , <i>Patinopecten</i> , <i>Opalia</i> , <i>Dallinella</i> , <i>Terebratalia</i> , <i>Chlamys</i> , <i>Argopecten</i> , Ostracoda, forams)	0.25 mile to the south; depth - exposed in roadcut in canyon wall
LACM IP 245, 11910, 20562, 21519 – 21521	Along canyon west of Alma Real Drive and east of Potrero Canyon Park	Unknown formation (Pleistocene, hard conglomerate and sandstone)	Invertebrates (uncatalogued)	0.4 mile to the east; depth - surface

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology

5.3 Review of Historic Topographical Maps and Aerial Photographs

Langan reviewed both historical aerial photographs and topographic maps employing the Nationwide Environmental Title Research, LLC (NETR) and University of California, Santa Barbara's (UCSB) database. This analysis was conducted to 1) better understand the natural environment in relation to the proposed Project; 2) identify natural and human-made changes to the proposed Project site over time; and 3) better determine the potential for intact cultural deposits to exist within the proposed Project site.

A review of all available historic aerial photographs was conducted and includes the following years: 1927, 1940, 1944, 1947, 1952, 1964, 1967, 1972, 1980, 1985, 1989, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020 (NETR 2024b, UCSB 2024). Historic aerials were employed to obtain approximate dates of built environment construction and alterations, whether the study area has been subjected to alluvial deposits by way of flooding, debris flows or mudslides, and placement of artificial or foreign fill soils that may have buried intact archaeological deposits.

A review of available topographic maps was conducted and includes the following years: 1903, 1908, 1913, 1924, 1928, 1929, 1932, 1937, 1944, 1947, 1953, 1957, 1960, 1965, 1968, 1973, 1982, 1985, 1995, 2012, 2015, 2018, and 2022 (NETR 2024a). Topographic maps depict elevation of the proposed Project and surrounding areas and illustrate the past and current

location of select roads, structural features and community services (e.g. Firehouses, Hospitals, churches, community centers, etc.). Although topographic maps are not comprehensive and do vary from year to year in their inclusion of information, they are another tool in determining the nature of land use and the chronological development of a study area. Table 4 summarizes the findings of the historic aerial and topographic map review.

Table 4. Historic Aerial and Topographic Map Review (NETR 2024)

Year	Description
Historic Aerials	
1927	Proposed Project site: undeveloped and covered in small vegetation. There appears to be a drainage, running east to west, intersecting the proposed Project site. The current street layout is present. Surrounding area: development consists of two residential structures east of North Mount Holyoke Avenue and three residential structures spread out along North Beirut Avenue.
1940	Proposed Project site: no apparent changes that suggest ground disturbance has occurred. Surrounding area: increase of residential development; parcels directly north and south of the proposed Project site are undeveloped.
1944	Proposed Project site: no apparent changes that suggest ground disturbance has occurred. Surrounding area: one residential structure south of the proposed Project site, located at 365 North Mount Holyoke Avenue
1947	Proposed Project site: no apparent changes that suggest ground disturbance has occurred. Surrounding area: the parcel north of the proposed Project site appears to have been graded.
1952	Proposed Project site: no apparent changes that suggest ground disturbance has occurred. Surrounding area: the sidewalk area along the eastern boundary of the proposed Project site has been cleared of vegetation.
1964	Proposed Project site: no apparent changes that suggest ground disturbance has occurred. Surrounding area: one residential structure north of the proposed Project site, located at 437 North Mount Holyoke Avenue.

Year	Description
1967 - 2020	Proposed Project site: increase of vegetation but there have been no apparent changes within the proposed Project site that suggest ground disturbance has occurred.
Topographic Maps	
1903	Proposed Project site: undeveloped. Surrounding area: Temescal Canyon to the west and waterway depicted within the canyon. Pier labeled "Port Los Angeles" is depicted approximately 0.5-miles to the southeast.
1908 - 1924	Proposed Project site and surrounding area: There are no apparent changes within that suggest ground disturbance has occurred.
1928	Proposed Project site: There are no apparent changes within that suggest ground disturbance has occurred. Surrounding area: Mount Holyoke Avenue and the surrounding roads depicted consistent with current alignments. Pier labeled "Port Los Angeles" no longer shown.
1929	Proposed Project site and surrounding area: map depicts the same information as the 1924 map.
1932	Proposed Project site and surrounding area: map depicts the same information as the 1928 map.
1937	Proposed Project site and surrounding area: map depicts the same information as the 1924 map.
1944	Proposed Project site: There are no apparent changes within that suggest ground disturbance has occurred. Surrounding area: structures depicted along the eastern side of Mount Holyoke Avenue, Radcliff Avenue, and within the surrounding city blocks.
1947	Proposed Project site and surrounding area: map depicts the same information as the 1924 map.
1953 - 2020	Proposed Project site: There are no apparent changes within that suggest ground disturbance has occurred. Surrounding area: street layout and some structures are depicted, such as churches and schools; no structures along the roads surrounding the proposed Project site are shown.

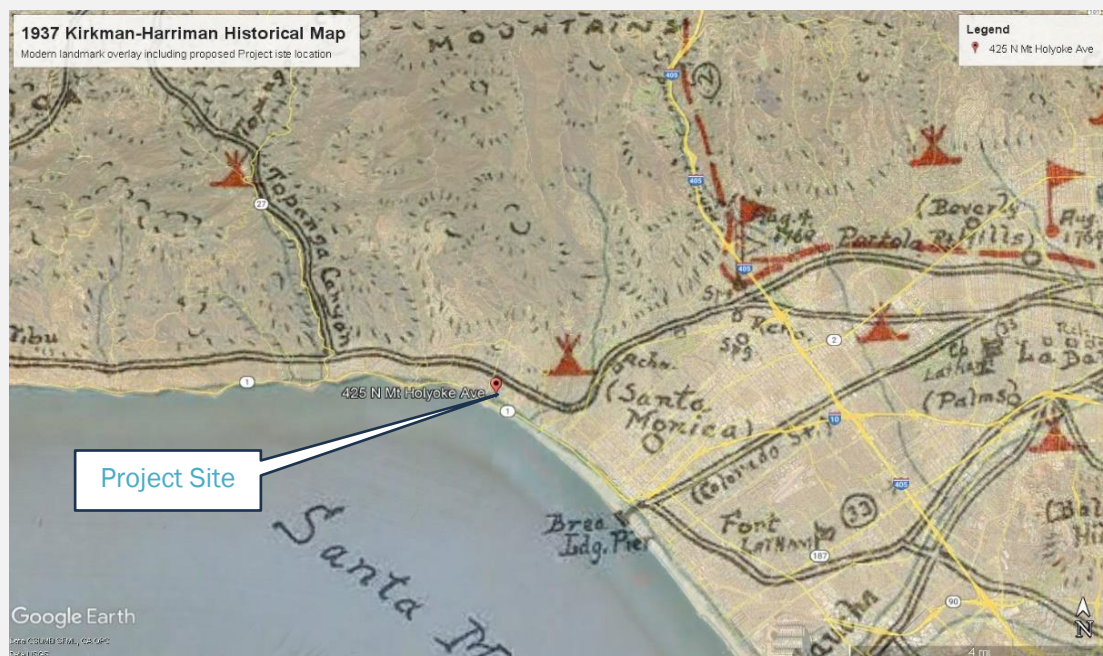
Based on review of historic photographic aerials and topographic maps, the proposed Project site has remained undeveloped since at least 1927; the parcel immediately adjacent and south has been develop since at least 1944; and the parcel immediately adjacent and north since at least

1964. No evidence of the fill soils identified within the proposed Project site by the geotechnical investigation (Tomlin et al. 2023) was apparent during the topo and aerial review. Considering Mount Holyoke Road is present in the 1927 aerial, the fill soils present on site may originate prior to 1927 when the Mount Holyoke Road was constructed.

5.4 1937 Kirkman-Harriman Historical Map Review

Langan reviewed relevant scholarly and ethnographic literature for information pertaining to past indigenous/Native American use of the proposed Project site and immediate vicinity. This review included consideration of sources commonly identified through Tribal consultation, notably the 1937 *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860* (Kirkman-Harriman Map) (see Image 1, below). The Kirkman-Harriman map (1937) was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833) and as a result is highly generalized due to scale and age and may be somewhat inaccurate with regard to distance and location of mapped features. Additionally, the map contains no specific primary references; however, it does match with the details documented by the Portola expedition (circa 1769-1770). While the map is a valuable representation of post-mission history, it has some limitations, as mentioned, and substantiation of the specific location and uses of the represented individual features by review of archaeological or other primary documentation should be conducted on a case-by-case basis.

Image 1. 1937 Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860



Source: Kirkman-Harriman 1937 Pictorial and Historical Map of Los Angeles County: 1860-1938 AD; Google Earth 2024

Based on a comparative review of the Kirkman-Harriman map (1937) overlaid in Google Earth, following are observations of features relative to the proposed Project site:

- An east-west trending “ancient road” is mapped approximately 0.25 miles to the north and another north-south trending “ancient road” is mapped 1.3 miles to the west.
- A watercourse, likely present-day Topanga Creek, similarly aligned to present-day Topanga Canyon is depicted approximately 2.7 miles to the northwest. The general hydrography and waterways of this type provide hospitable landscape for seasonal or permanent hamlets, trade depots, and ceremonial religious sites.
- The nearest unnamed Native American village site is mapped approximately 1.1 miles to the east and another unnamed village site is mapped approximately 5.6 miles to the northwest and adjacent to the above-mentioned watercourse, within the foothills of the Santa Monica Mountains.
- “R[an]cho Santa Monica” is mapped approximately 1.9 miles to the east.
- The route taken by the Spanish explorer Gaspar de Portolá in 1769 is located 4.3 miles to the northeast. In this location is where the route shifts from east/west to north/south and where the expedition group is mapped as making a campsite on August 4, 1769.

No archaeological evidence of the above-mentioned village was identified in the CHRIS database or as the result of Langan’s literature review. However, the SCCIC records do indicate that two (2) archaeological resources, precontact archaeological sites (P-19-000135/CA-LAN-000135 and P-19-000224/CA-LAN-000224), were identified within the records search area. The archaeological resource nearest the proposed Project site, -000135/CA-LAN-000135, is mapped approximately 0.8 miles to the southeast. This suggests that although there are no villages illustrated on the Kirkman-Herriman map (1937) nearer than two miles from the proposed Project site, the general area was utilized in precontact and historic times. Historic documents, maps, ethnographic data and oral histories document Native American presence in the general vicinity of the proposed Project site during the Ranchero period. Therefore, it is reasonable to consider there is potential to encounter Native American pre-contact and post-contact and non-Native American resources in areas and depths not previously explored/investigated.

5.5 Native American Heritage Commission Sacred Lands File Search

The NAHC SLF search was conducted by Cultural Resources Analyst Andrew Green to determine the presence of any reported Native American cultural resources within proximity to the proposed Project site as listed in the NAHC maintained SLF (see Confidential Attachment C). The NAHC SLF search results were positive. The SLF record is maintained at a PLSS Section level, meaning, the negative or positive result is respective of a general area covering approximately one-square

mile (640 acres) rather than the exact study area. Therefore, the recorded tribal cultural resource, resulting in the positive finding, could be anywhere within the one-square mile PLSS Section (640 acre) area.

The NAHC identified fourteen Native American individuals who would potentially have specific knowledge as to whether or not cultural resources, meeting the definition of a tribal cultural resource (TCR) consistent with California PRC § 21074, have been identified within or adjacent to the proposed Project site and could be at-risk as a result of project implementation. As requested by the NAHC, the City has contacted these fourteen identified tribes. The following tribal contact was copied on the results email sent by the NAHC: gtongva@gmail.com and christina.marsden@alumni.usc.edu.

It is important to understand that the SLF maintained by the NAHC represent a curation of “sacred lands” or TCRs provided by Tribal entities and Native American representatives. For various reasons, Tribal entities and Native American representatives do not always report sacred lands or TCRs to the NAHC. As such, the NAHC’s SLF is not a comprehensive list, and searches of the SLF must be considered in concert with other research and not used as a sole source of information regarding the presence of TCRs or cultural resources.

5.6 Tribal Consultation

On January 15, 2025, in accordance with the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report* MMP mitigation measure 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects, the City sent notification letters to those California Native American tribes who have previously requested formal notification of proposed Projects under the agency’s jurisdiction. These letters included information about the proposed Project, an invitation to participate in government-to-government consultation, how to contact the City if the tribe desires to consult, and that the request to consult must occur within 30 days of receipt of the letter. As directed by NAHC, the City sent an email to all the tribes included in NHAC’s SLF Letter to the City, explaining that the SLF was positive and to contact the City if the tribe had any information to share regarding the SLF results. The Santa Ynez Band of Chumash Indians reached out to the City on August 20, 2026 Communication that has occurred in support of the tribal notification/consultation process is summarized in Table 5.

Table 5. Native American Consultation Summary

Contact Name	Contact Dates	Record of Correspondence
Fernandeño Tataviam Band of Mission Indians, Rudy Ortega, Tribal President	January 15, 2025	No response received
Fernandeño Tataviam Band of Mission Indians, Miguel Luna, THCP Director	January 15, 2025	No response received

Contact Name	Contact Dates	Record of Correspondence
Gabrielino Tongva Indians of California Tribal Council, Robert F. Dorame, Chairperson	January 15, 2025	No response received
Gabrielino-Tongva Tribe, Charles Alvarez, Chairperson	January 15, 2025	No response received
Gabrielino-Tongva Tribe, Sam Dunlap, Cultural Resource Director	January 15, 2025	No response received
San Fernando Band of Mission Indians, Donna Yocum, Chairperson	January 15, 2025	No response received
Torres Martinez Desert Cahuilla Indians, Thomas Torte, Chairperson	January 15, 2025	No response received
Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), Andrew Salas, Chairperson	January 15, 2025	January 21, 2025: The Kizh provides letter to formally request consultation. January 23, 2025: City initiated consultation. January 27, 2025: City requested from the Kizh evidence for tribal cultural resources within or near the Project site. Kizh responded the same day and confirms they will share documents with the City. January 30, 2025: The Kizh emailed the City to explain their concerns about specific subsurface ground disturbance activities and provided archival documentation about TCRs. The Kizh also requested all information regarding “the history of the subsurface soils that will be impacted as part of this project’s ground disturbance activities”. The Kizh provided proposed mitigation measures and requested notification whether and to what extent the mitigation measures will be included. February 11, 2025: The City responded to the Kizh with questions about the documents Kizh provided and how they relate to concerns about presence of and potential impacts to TCRs. March 3, 2025: The City sent a follow-up email to the Kizh due to no response. The Kizh provided formal response. March 7, 2025: Based on previous communication from the Tribe, the City asks Kizh if they would like to consult on multiple projects at the same time. Kizh responded stating that all projects are within their ancestral homeland and should be treated accordingly.

Contact Name	Contact Dates	Record of Correspondence
		March 12, 2025: The City asked the Kizh if they have any documentation on previously recorded tribal cultural resources within the project site. March 26, 2025: Due to no response, the City sent a follow-up email to the Kizh regarding the City's request for additional evidence/ documentation for project site specific resources. April 7, 2025: Due to no response, the City sent a follow-up email to the Kizh regarding the questions sent on February 11 and additionally asked if the Kizh has any documentation on previously recorded resources within the project site. April 22, 2025: The City emailed the Kizh that the City had concluded the presence of TCRs within the general vicinity of the project site and provided Mitigation Measures. April 23, 2025: The Kizh asked that the Mitigation Measures be reassessed. May 2, 2025: The City responded to the Kizh that they wanted to continue meaningful consultation. The Kizh responded with documents to reaffirm the Kizh's ancestral connection to the project area and provided proposed Mitigation Measures. May 7, 2025: The City acknowledged that the general area of the proposed Project site is sensitive in regards to tribal cultural resources. The City requested the Kizh's feedback on the Housing Element Mitigation Measures. May 21, 2025: The City acknowledges the mitigation measures provided by the Kizh and provide revised mitigation measures for the Kizh's review. June 13, 2025: The City communicates further about how to implement the City's standard TCR mitigation measures. August 8, 2025: Due to no response to the City's June 13, 2025 email including revised mitigation measures for the Kizh's review, the City sent a follow-up email to the Kizh. As of the preparation of this report, consultation was ongoing and had not been closed.

Contact Name	Contact Dates	Record of Correspondence
Gabrielino/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson	January 15, 2025	No response received
Gabrielino/Tongva Nation, Sandonne Goad, Chairperson	January 15, 2025	No response received
Soboba Band of Luiseño Indians, Isaiah Vivanco, Chairperson	January 15, 2025	No response received
Gabrielino Tongva Indians of CA	July 22-23, 2026, and August 6, 2026	July 22, 2026: The City sent the Gabrielino Tongva Indians of CA an email. Christina Conley responded the same day. July 23, 2026: The Tribe and City had a call to discuss potential impacts to TCRs. August 6, 2026: The Tribe, City, and Langan had a follow-up call to continue to the discussion.
Santa Ynez Band of Chumash Indians (SYBCI)	August 20, 2026: The SYBCI contacted the City requesting consultation. August 27, 2026: The City met with the SYBCI. The SYBCI provided information about TCRs present within the proximity of the proposed Project site. As of the preparation of this report, consultation was ongoing and had not been closed.	

As explained in Table 5, one tribe requested and participated in government-to-government consultation with the City regarding this proposed Project, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh). During the consultation, the Kizh provided documentation to support their assertion that TCRs exist within the proposed Project site that could be impacted by implementation of the proposed Project. Langan reviewed all documents provided by the Kizh to assist in determining whether the documentation provided substantial evidence that a tribal cultural resource(s) exists within the proposed Project site and could potentially be adversely impacted by project implementation. The information provided by the Kizh is protected from public view in accordance with PRC Section 20182.3(c) and therefore only a general description of the documentation and the results of Langan’s and the City’s review are provided in this report.

Based on the information provided by the Kizh, there is no specific evidence that a TCR exists within the proposed Project site. Although the documentation provided by the Kizh demonstrates land use and traditional practices occurred within the Los Angeles Basin and within the general Project area understood to be the traditional Gabrieleño territory, it does not provide detail adequate enough to support the contention that a TCR exists specifically within the proposed Project site. This determination was also supported by evidence provided in this report.

In their review of the documentation provided by the Kizh, the City came to the same conclusion that in the absence of substantial evidence a TCR has not been identified within the proposed

Project site. In accordance with 4.15-1a of the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report MMP*, since substantial evidence was not identified that tribal cultural resources exist within the proposed Project site that would potentially be impacted by Project implementation, the Project is subject to compliance with all Environmental Protection Measures (EPMs) as provided in the City of Los Angeles City Planning Chapter I Environmental Protection Measures Handbook (see Section 4.3 Local). The measure also includes any noticing requirements adopted by the Director of City Planning as well as compliance with 4.15-1(b) Discovery of Potential Tribal Cultural Resources.

The City acknowledged that the general area of the proposed Project site is sensitive in regards to tribal cultural resources. The City requested the Kizh's feedback on the Housing Element Mitigation Measures. The Kizh objected to the employment of the City's mitigation measures provided in the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report MMP* and presented their own mitigation measures for the City's review. The City provided the Kizh with revised mitigation measures and requested the Kizh's response and thoughts. Due to no response by the Kizh to the City's revised mitigation measures, the City sent a follow-up email to the Kizh. As of the preparation of this report, no further communication has been received from the Kizh.

The City contacted the Gabrielino Tongva Indians of CA on July 22, 2026, requesting the Tongva's feedback. Christina Conley responded the same day. On July 23, 2026, the Tribe and City had a call to discuss potential impacts to TCRs in the area. On August 6, 2026, the Tribe, City, and Langan had a follow-up call to continue the discussion in which the Tongva requested more information about the geotechnical studies to determine the soil conditions.

The Santa Ynez Band of Chumash Indians (SYBCI) contacted the City on August 20, 2026, requesting consultation. The City met with the SYBCI on August 27, 2026. The SYBCI provided information about TCRs present within the proximity of the proposed Project site and requested a copy of the archaeological report.

As of the preparation of this report, consultation between the City and tribes is ongoing and has not been closed.

6.0 FIELDWORK

6.1 Field Survey Methods

An Intensive-level archaeological pedestrian survey of the proposed Project site was completed on October 2, 2023, by an archaeological technician under the direction of Langan's Principal Investigator, Heather McDaniel McDevitt. The intensive-level survey methods consisted of an opportunistic survey to observe exposed soils within the proposed Project site. Careful attention was

given to all barren ground including at the base of trees and bushes, and any subsurface soils exposed by burrowing animals. Ground surface visibility within the proposed Project site was minimal, 10-20 percent along the hillside with 0 percent visibility under the sidewalk along the eastern border of the Project site. In areas where soil was partially exposed or covered by gravel/sand/grass, surface scrapes were implemented, when necessary, to enhance detection of archaeological materials that may have been obscured on the surface. The ground surface was inspected for precontact and postcontact artifacts of Native American origin (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). All fieldwork was documented using field notes; digital photography; iPad technology with close-scale field maps; and aerial photographs. Locational data was collected using the ArcGIS Collector application. All field practices met the Secretary of Interior's standards and guidelines for a cultural resource pedestrian survey.

6.2 Field Survey Results

At the time the survey was conducted, the proposed Project site was mostly undeveloped with grasses and shrubs growing within the main portion of the parcel with minor patches of exposed soil interspersed throughout the hillside, as well as a few trees clustered near the bottom of the hill. Due to the extreme slope, obscured heavily by non-native grasses, shrubs, duff, and trees, present within approximately 95 percent of the proposed Project site, only 5 percent of the site was able to be surveyed. Of the surveyable area, vegetation cover was present within approximately 85 percent providing poor to fair (20-50 percent) ground surface visibility. The sidewalk accounted for approximately 3 percent of the proposed Project parcel and provided 0 percent ground surface visibility. No Native American pre or post contact and non-Native American archaeological cultural materials were identified as a result of the survey. Soils observed on site appeared consistent with the mapped USDA soils series' characteristics mapped for the proposed Project site. General ground surface visibility was limited in approximately 95 percent of the proposed Project resulting in less than reliable findings for the survey.

7.0 FINDINGS AND CONCLUSIONS

7.1 Soil Conditions

The soils mapped within the proposed Project site and surrounding area are categorized as: Urban land-Sepulveda-Pierview complex in 2-12 percent slopes accounting for approximately 57 percent, and Chumash Boades-Malibu association in 30-75 percent slopes accounting for approximately 43 percent of the proposed Project site. However, the geotechnical investigation conducted for the proposed Project revealed that fill soils are present between a minimum depth of eight (8) feet and a maximum depth of eleven (11) feet. These soils were generally Clayey Sand (SC) and Sandy Clay

(CL) with fine-grained sand, brown to reddish brown, moist, medium stiff, with trace gravels. Although no records were found for fill placement rendering the soils undocumented, the soils are not consistent with the native soils mapped for the area and suggest they are imported fill. Additionally, the presence of native geologic materials does not necessarily indicate intact, undisturbed native soil with respect to the potential of encountering intact archaeological deposits. Colluvium, slopewash/graben debris, and ancient or modern landslide debris are naturally occurring soil deposits but have been transported and redeposited and therefore have very low potential for possessing intact archaeological deposits.

7.2 Archaeological and Tribal Cultural Resources

The proposed Project includes construction of a new three-story, single-family, 12, 872 square foot (ft) residential structure including an attached garage, pool/spa, decks, attached trellis, and retaining walls. Site preparation would include grading and terracing of the property resulting in approximately 1,950 cubic yards of soil export. Proposed excavations are not expected to exceed 25 feet below ground surface for the building structure with an additional 50 feet below the structure for installation of caissons. The CHRIS database records search identified thirty-seven (37) previous cultural resource studies conducted within the one-mile records search radius; none of the reports' study areas overlap the proposed Project site. No resources have been recorded within or adjacent to the proposed Project site and fifteen (15) cultural resources have been previously recorded within the one-mile records search radius. Of the identified cultural resources, thirteen (13) are built environment resources the closest of which is 790 meters (2,592 ft.) southeast of the proposed project site. The remaining two (2) resources are both precontact archaeological resources, the closest of which is located 1,340 meters (4,396 ft.) southeast of the proposed Project site. Results of the pedestrian survey were inconclusive given the lack of observable ground surface available for inspection and the confirmed presence of undocumented fill soils. Archival review suggests that the proposed Project site has been undeveloped since at least 1927 and, other than the deposit of fill soils, has not been subject to significant ground disturbing activities since then.

The general proposed Project area is mapped as possessing Late Pleistocene alluvial soils (approximately 11,700 to 126,000 years old (McGill 1989)) derived from the nearby Santa Monica Mountains. Late Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. However, they are near the early terminal period of human occupation lowering the potential for encountering unidentified cultural materials within the proposed Project site. Additionally, results of the two geotechnical investigations conducted within the proposed Project site indicate that native soils only exist at a depth between seven and a half (7.5) and eleven (11) feet bgs and extend to between fourteen (14) and forty (40) feet bgs. As a result, grading activities as currently proposed only have the potential to encounter native soils below seven (7) feet bgs and caisson installation below twelve (12) feet bgs. Artificial fill can possess cultural material but not in an intact state and likely not in a primary context/originating from the proposed Project site and therefore would not be considered significant pursuant to CEQA. Given the proximity

of the proposed Project site to natural water sources and ocean resources, the presence of a recorded precontact site within one mile as well as the notation of a Native American village site within general proximity to the proposed Project site on a historic map (Kirkman-Harriman 1937) there is potential for archaeological resources to exist within the general Project area. However, since habitation sites are typically found in relatively even topography, the extreme slope present within approximately 95 percent of the property significantly reduces the potential of archaeological materials to be present within the proposed Project site. Pre and post contact activities that could have resulted in the presence of significant archaeological deposits would be limited in an area with steep slopes lacking natural outcrops useful for shelter and hunting blinds. As a result, due to the physical environment and the limited disturbance of intact native soils, the likelihood of encountering archaeological deposits during ground disturbing activities is highly unlikely. However, while the disturbance of archeological resources is highly unlikely, the project will comply with the Housing Element's Program EIR MM 4.4.2 to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.

In accordance with the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report* MMP mitigation measure 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects, the City sent notification letters to those California Native American tribes who have previously requested formal notification of proposed Projects under the agency's jurisdiction. One tribe, the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh), responded requesting government-to-government consultation. All documentation and information provided by the Kizh was considered by the City and a good faith effort was made by the City to come to an agreement with the Kizh regarding the protection of TCRs.

The City confirmed that the Project would be subject to the Housing Element Program's EIR mitigation measures 4.15a and 4.15b that requires the preparation of a cultural resources report, record search, and notification to tribes, as well as steps that must be followed in the event of an inadvertent discovery of a tribal cultural resource. The Kizh objected to the City's mitigation measures and presented their own mitigation measures for the City's review. The City recognized the Kizh's concerns and provided revised mitigation measures for implementation that incorporated portions of the mitigation measures present by the Kizh. Tribal consultation with the Kizh is ongoing and may require further mitigation that if occurs would be included in the draft EIR.

The City has consulted with the Gabrielino Tongva Indians of California (Tongva) and the Santa Ynez Band of Chumash Indians (SYBCI) regarding the potential impacts to TCRs in the area. Both tribes have shared information and consultation is ongoing and may require further mitigation. If that occurs, it will be included in the draft EIR.

7.3 Paleontological Resources

Based on the findings provided by the Natural History Museum of Los Angeles County, no paleontological resource localities have been documented within the proposed Project site. However, nearby paleontological resource localities have been recorded in the surrounding area and within the same sedimentary deposits. A review of mapped soils and the geotechnical study findings demonstrate that Pleistocene-era alluvial soils are documented within the proposed Project site between seven and a half (7.5) and eleven (11) feet bgs and extending to between fourteen (14) and forty (40) feet bgs. Based on the documented presence of paleontological resources within Late Pliocene coarse-grained sandstone and hard conglomerate and sandstone located as near as 0.5 mile to the north, 0.4 mile to east and 0.25 mile to the south of the proposed Project site, there is potential for finding intact paleontological resource deposits Pleistocene stratum. However the Project will comply with the Housing Element Program EIR's mitigation measure 4.5-1(a) which help to reduce impacts to paleontological resources.

7.4 Summary

In consideration of impacts to archaeological, paleontological and tribal cultural resources in accordance with the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report* MMP and completion of the *2021-2029 Citywide Housing Element Streamlining Checklist Form* (Form) the following conclusions have been made and are supported by the evidence provided in this report:

- No pre or post contact archaeological resources of Native American origin or historic archaeological resources were identified within the proposed Project site and the likelihood for yet unidentified resources of the same to exist with the proposed Project site is low. Accordingly, in compliance with the Citywide Housing Element Program EIR Checklist requirements, Mitigation Measure 4.4-2 Archaeological Resource will be implemented.
- No substantial evidence of tribal cultural resources within the proposed Project was submitted by the Kizh Tribe in accordance with the *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report* MMP mitigation measure 4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects. Accordingly, in compliance with the Citywide Housing Element Program EIR Checklist requirements, Tribal Cultural Resources Mitigation Measure 4.15-1(a) and-1(b) will be implemented. Further, as of the preparation of this report, consultation between the City and three tribes referenced above is ongoing and has not been closed. Thus, further mitigation measures may be required. As of the preparation of this report, consultation between the City and tribes is ongoing and has not been closed.
- No paleontological resources were identified within the proposed Project site. However, resources of the same have been identified within close proximity and the proposed

Project site is underlain by soils or geologic units consistent within which paleontological resources have been found and therefore, have the potential of containing paleontological resources. Accordingly, in compliance with the Citywide Housing Element Program EIR Checklist requirements , 4.5-19 (d) Fossil Discovery, Salvage, and Treatment Mitigation Measure will be implemented

8.0 MANAGEMENT RECOMMENDATIONS AND IMPACT ANALYSIS

Based on the available information and the resulting findings of our investigation, it is unlikely any archaeological and human remains will be encountered during and adversely impacted as a result of Project construction. However, there is a low to moderate potential that previously unrecorded paleontological resources may be inadvertently encountered during project implementation specifically as a result of ground disturbances occurring below the depth of 52 inches below current grade.

To support appropriate adherence to *Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report* MMP. Langan recommends the those following mitigation measures provided to the Kizh during tribal consultation as well as those measures outlined in the Los Angeles City Planning Chapter 1 Environmental Protection Measures Handbook (2025), that are relevant to the protection and proper treatment of archaeological, paleontological and tribal cultural resources and human remains, be employed.

Prior to commencement of construction activities for all phases of project implementation, the project applicant/owner/developer should retain qualified archaeological principal investigator who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology and has experience and is well-acquainted with the history of the ancestral tribes geographically connected to the Project site referred to here on as "Qualified Archaeologist". Additionally, a paleontological principal investigator who meets the Society of Vertebrate Paleontology (SVP) Standards should be retained referred to here on as "Qualified Paleontologist".

Archaeological Resources (MM 4.4-2)

Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.

- A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should

include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).

- B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.
- C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.
- D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.
- E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.
- F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (<http://ohp.parks.ca.gov/pages/1054/files/armr.pdf>).
- G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.
- H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.

- I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

- K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

Fossil Discovery, Salvage, and Treatment - MM 4.5-1(d)

If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines. Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).

The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.

Discovery of Potential Tribal Cultural Resources - 4.15-1(b)

In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records,

survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.

Provided the prescribed measures are properly implemented, the potential impact to archaeological, paleontological and tribal cultural resources and human remains is considered to be less than significant.¹

¹ Consultation with the Tribes is ongoing and may require further mitigation to be included in the draft EIR.

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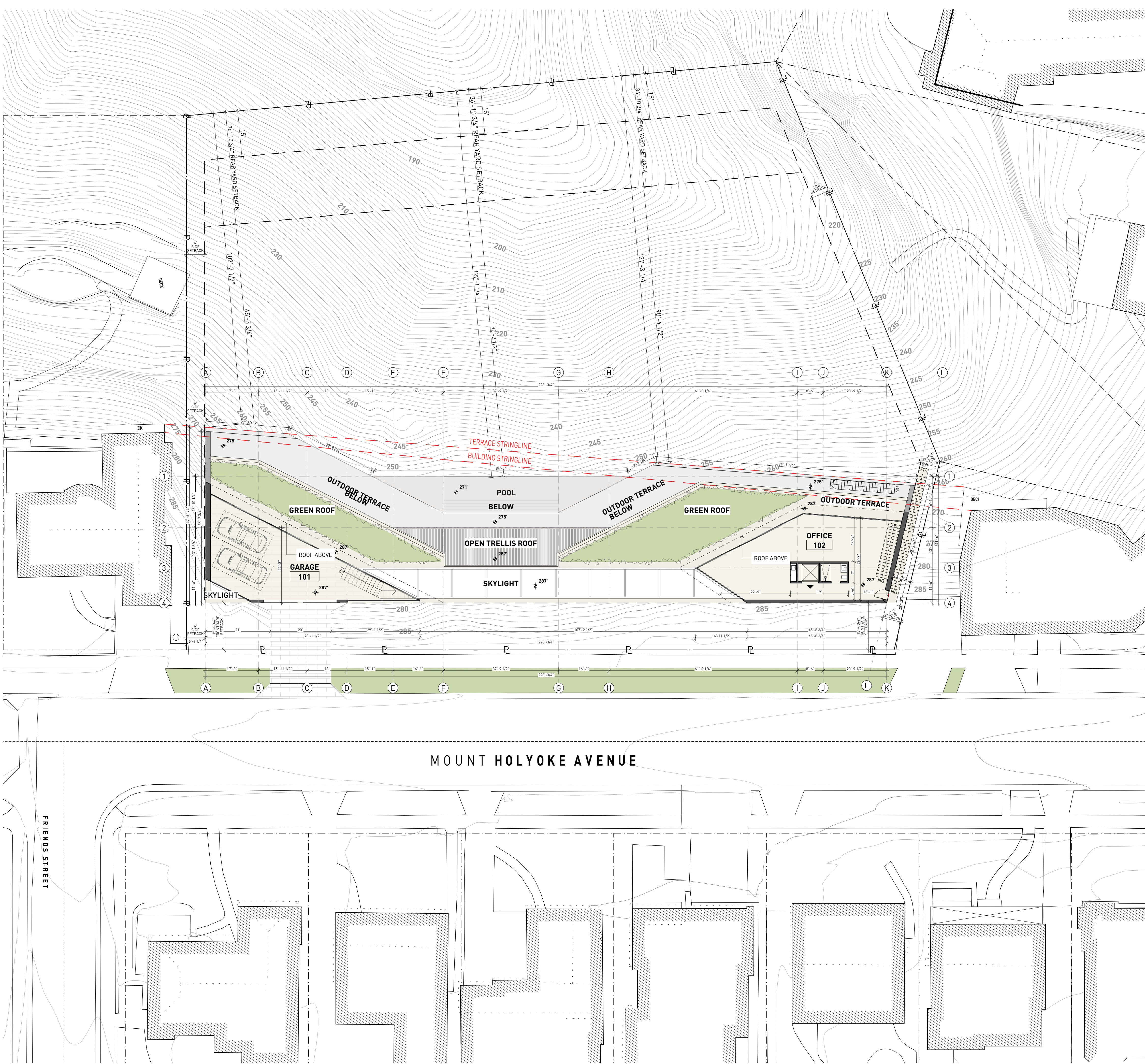
USDA. 2024b. Natural Resources Conservation Service Official Soil Series Descriptions. Accessed May 2024. <https://soilseries.sc.egov.usda.gov/osdname.aspx>

ATTACHMENT A
FIGURE 1. SITE VICINITY MAP
SITE PLAN

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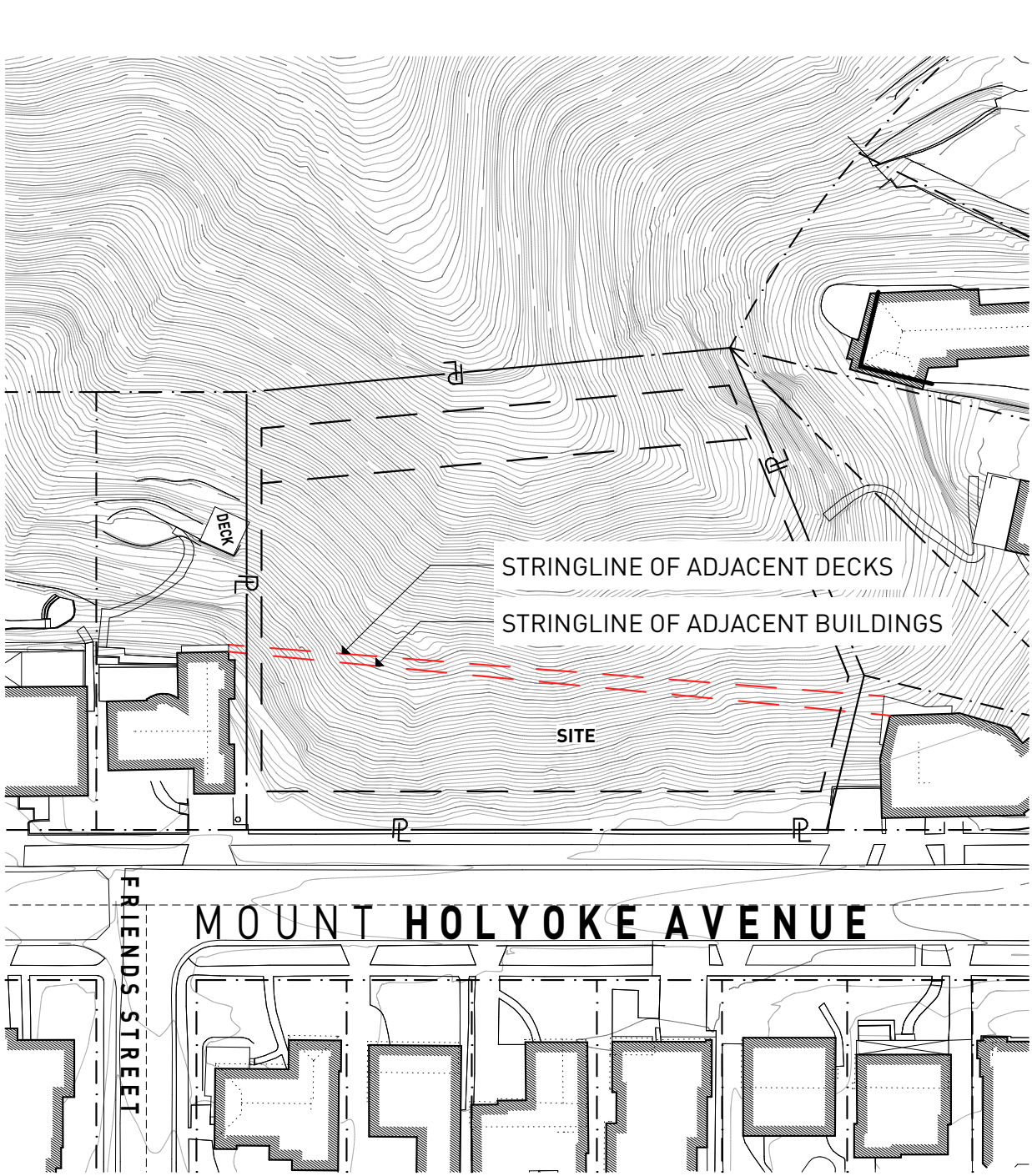


LANGAN Langan CA, Inc. 924 Anacapa Street, Suite 2X Santa Barbara, CA 93101 T: 805.957.6000 F: 805.957.6001 www.langan.com	Project 425 MOUNT HOLYOKE AVENUE PACIFIC PALISADES LOS ANGELES COUNTY CALIFORNIA	Figure Title SITE VICINITY MAP	Project No. 781018801 Date 5/22/2024 Scale 1" = 500 feet Drawn By TO	Figure 1
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01

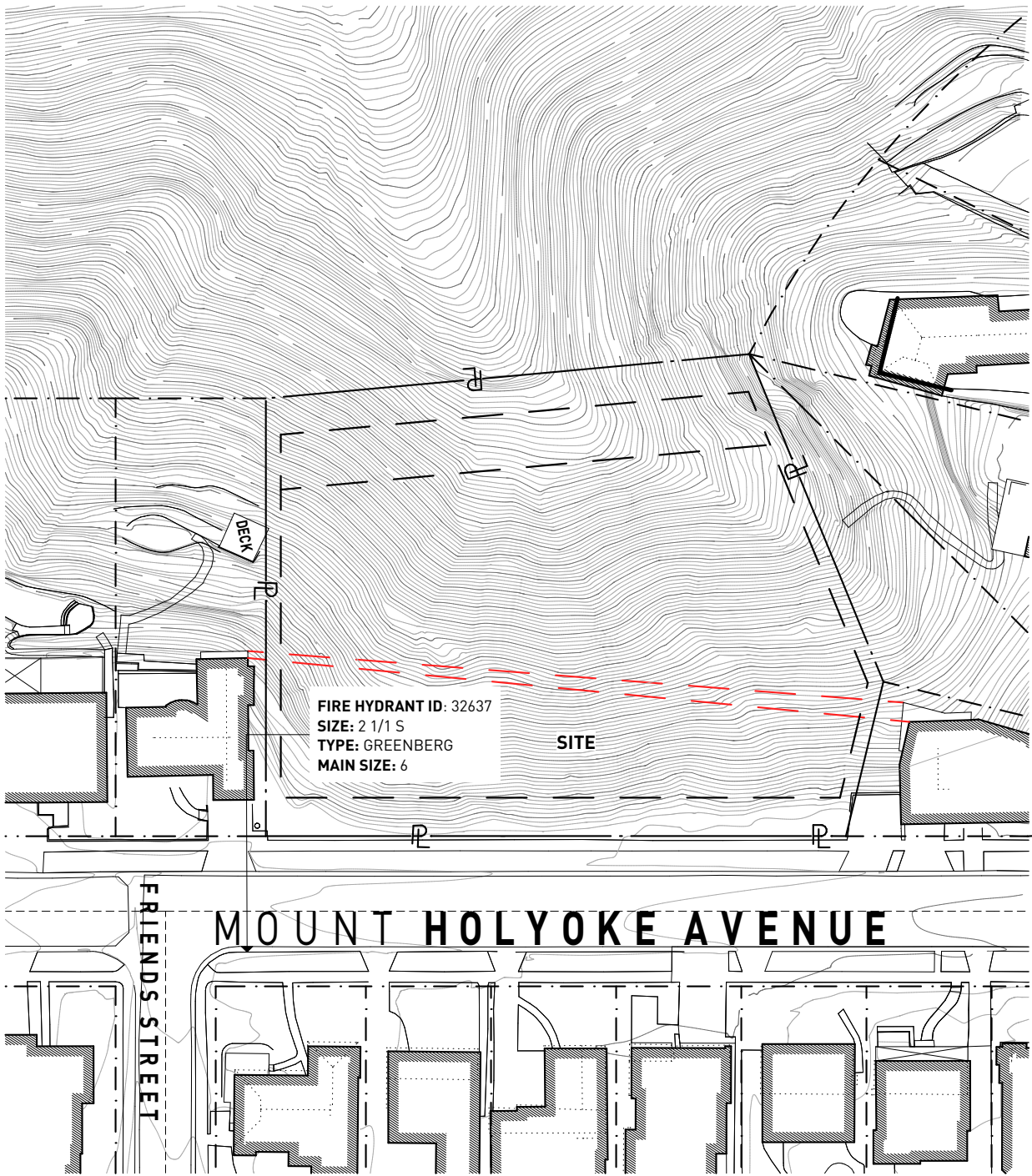
REAR YARD STRING LINE SETBACK DIAGRAM
SCALE: 1/16" = 1'-0"



02

REAR YARD STRING LINE SETBACK DIAGRAM
SCALE: 1/64" = 1'-0"

NOTE:
THE PROJECT IS LOCATED ON A BLUFF FACE AND IS UTILIZING A STRING LINE BETWEEN NEIGHBORING PROPERTIES TO EXHIBIT VISUAL COMPATIBILITY WITH THE CHARACTER OF THE SURROUNDING AREA IN ACCORDANCE WITH SECTION 30251 OF THE CA COASTAL ACT.



03

FIRE HYDRANT VICINITY MAP
SCALE: 1/64" = 1'-0"

Project No

2308

Client

425 N Mt Holyoke Ave
Pacific Palisades, CA 90272

Design Architect

**Oppenheim
Architecture**

245 NE 37 Street
Miami FL 33137
P 305 576 8404
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W oppen.com

SURVEYOR

**STEVE OPDAHL
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GEOLOGIST

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GEOTECHNICAL ENGINEER

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CONSULTANTS**

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BIOLOGIST

ENGLAND ECOLOGY

www.mcengland.com
(213) 304-1826

Landscape Architect

Revisions

Mark Date Description

Title

SITE PLAN

1/16" = 1'-0",
1/64" = 1'-0"
NOT FOR CONSTRUCTION

Design Development

0000
Mt Holyoke Residence

Drawing Issued on 5/10/24

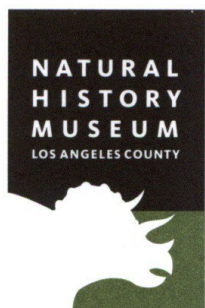
A102

ATTACHMENT B
CHRIS RECORDS SEARCH RESULTS – CONFIDENTIAL

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ATTACHMENT C
MNHLA RECORDS SEARCH RESULTS

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

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

January 31, 2025

LANGAN
Attn: Marc Abramiuk

re: Expedited paleontological resources records search for the Mt Holyoke Project

Dear Marc:

I have conducted a search of our paleontology collection records for the locality and specimen data for proposed development at the Mt Holyoke project area as outlined on the portion of the Topanga USGS topographic quadrangle map that you sent to me via e-mail on January 24, 2024. We do not have any fossil localities that lie directly within the proposed project area, but we do have fossil localities nearby from the same sedimentary deposits that may occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM IP 4848	South of Bowdoin St in Temescal Canyon	Unknown formation (Pleistocene)	Barrel-bubble snail (<i>Sulcularia xystrum</i>)	Unknown
LACM VP 6384; LACM IP 21517, 4472, 21516, 4526, 7696	Mouth of Temescal Canyon	Unknown formation (Late Pliocene; coarse-grained sandstone; alternately identified in collections as Pico or San Diego formations)	White shark (<i>Carcharodon carcharias</i>), Invertebrates (Echinoidea, <i>Dendraster</i> , <i>Patinopecten</i> , <i>Opalia</i> , <i>Dallinella</i> , <i>Terebratalia</i> , <i>Chlamys</i> , <i>Argopecten</i> , Ostracoda, forams)	Exposed in roadcut in canyon wall
LACM IP 245, 11910, 20562, 21519 – 21521	Along canyon west of Alma Real Drive and east of Potrero Canyon Park	Unknown formation (Pleistocene, hard conglomerate and sandstone)	Invertebrates (uncatalogued)	Surface

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the NHMLA. It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be

conducted by a paleontologist meeting Federal (43 Code of Federal Regulations Part 49.110) or Society of Vertebrate Paleontology standards.

Sincerely,

A handwritten signature in black ink that reads "Alyssa Bell". The signature is written in a cursive, flowing style. The first name "Alyssa" is connected to the last name "Bell". The signature is set against a light beige rectangular background.

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

ATTACHMENT D
NATIVE AMERICAN HERITAGE COMMISSION SACRED LANDS FILE
SEARCH RESULTS

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NATIVE AMERICAN HERITAGE COMMISSION

February 24, 2025

Heather McDaniel McDevitt
LanganVia Email to: hmcDanielmcdDevitt@Langan.com

Re: 425 Mount Holyoke Avenue Project, Los Angeles County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were positive. Please contact the Gabrielino Tongva Indians of California Tribal Council on the attached list for more information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

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. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

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

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment

CHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Sara Dutschke
MiwokPARLIAMENTARIAN
Wayne Nelson
LuiseñoCOMMISSIONER
Isaac Bojorquez
Ohlone-CostanoanCOMMISSIONER
Stanley Rodriguez
KumeyaayCOMMISSIONER
Reid Milanovich
CahuillaCOMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño IndiansCOMMISSIONER
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