A PHASE I CULTURAL RESOURCES INVENTORY FOR THE OXFORD RETENTION BASIN MULTIUSE ENHANCEMENT PROJECT, MARINA DEL REY, COUNTY OF LOS ANGELES, CALIFORNIA

Prepared for:

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July 2012
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Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines (guidelines) calls for the identification and evaluation of cultural resources on County of Los Angeles Department of Public Works (LADPW) projects prior to the issuance of grading permits. The LADPW retained Chambers Group (Chambers) to provide cultural resources management services for an approximately 7.3 acre parcel in Marina del Rey, California. The parcel is slated for multiuse enhancement development.

Pursuant to the guidelines, Chambers conducted a Phase I Cultural Resources Inventory (inventory) to identify historic and prehistoric resources on the subject property and to recommend mitigation measures as necessary. The inventory included a literature and records search and an intensive pedestrian survey of the property. Chambers also notified the Native American Heritage Commission and local Native American tribes affiliated with the area of the proposed project.

The records search shows that no cultural resource technical studies have been conducted on the subject property. No cultural resource sites were identified on the subject property during the record search. Three cultural resource sites have been recorded within a one-half mile radius of the subject property. Research indicates the old Venice dump was located within or in the vicinity of the subject project area.

Chambers conducted an intensive survey of the subject property on January 6, 2011. One historic site was observed on the subject property during the survey and recorded. This is a multicomponent site consisting of two historic elements, a remnant scatter associated with the old Venice Dump and foundations and concrete wall or slab possibly associated with flower beds or gardens. No prehistoric cultural resources were observed. In addition, a number of studies indicate the general area is sensitive for prehistoric and/or historic-period cultural resources.

Chambers recommends a qualified cultural resources monitor be onsite periodically to check for potential intact historic deposits associated with the Venice dump during ground disturbing activities, and for prehistoric deposits whenever construction excavations occur in native sediments. The grading permit or contract should contain a clause regarding the appropriate actions to be taken in the event that any subsurface archaeological deposits are unearthed during ground-disturbing construction activities. In that event, all activities must be suspended in the vicinity of the find until the deposit(s) are recorded and evaluated by a qualified archaeologist. If human remains of any kind are found, all activities must cease immediately and the Los Angeles County Coroner and a qualified archaeologist must be notified. If the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission (NAHC). The NAHC will then identify the most likely descendants to be consulted regarding treatment and/or repatriation of the remains.
Figure 1. USGS 7.5 Minute Venice Quadrangle Depicting Project Location
INTRODUCTION

This report provides the results of the cultural resources inventory for the proposed Oxford Retention Basin Multiuse Enhancement project (subject project) located on a 7.3-acre parcel within the Marina Del Rey area of the County of Los Angeles, CA (Figure 1). State law, as set forth in the California Environmental Quality Act (CEQA) §21083.2(a) and §15064.5, requires that a cultural resources survey of the 7.3-acre project area be completed before construction work can proceed.

In compliance with CEQA, LADPW retained Chambers to perform a records/literature review of cultural resources known to exist on or near the project area, as well as an archaeological field survey to identify any previously unrecorded cultural resources on the property.

LOCATION AND ENVIRONMENTAL SETTING

The subject property is located in Marina del Rey, County of Los Angeles, California. The subject property is bounded on the northeast by Oxford Avenue, Washington Avenue to the northwest, Admiralty Way to the southeast and the Oceana Retirement Home to the southwest. The property may be found on the Venice Quadrangle, Township 2 S, Range 15 W and Section 21 as shown on the USGS 7.5’ quadrangle map (Figure 1).

The property elevation ranges from approximately 0 to 20 feet above mean sea level (amsl). The 7.3-acre subject property contains 4.6 acres of water filled basin. The remaining acreage consists of landscaping and facility structures. Water levels fluctuate with rain and runoff amounts (Figure 2).

Sediments in the area consist of dark brown loamy sand over a light sandy clay with humus dark loam below; all landfill sediments obtained from dredging of the Marina del Rey harbor area. Shells are present in the sediments as a result of dredged materials (Dillon 1982). The property is in a relatively dense urban setting with no native vegetation and no native sediment visible. Non-native grasses and several palms and other ornamental trees are located in the landscaped areas. A modern trash scatter extends across the property particularly along the beaches.

Figure 2. Overview of Southern Portion of Subject Property from the West.
CULTURAL OVERVIEW

GENERAL PREHISTORY

It is generally believed that human occupation of southern California began at least 10,000 years before present (BP). The archaeological record indicates that between approximately 10,000 and 6,000 years BP, a predominantly hunting economy existed, characterized by archaeological sites containing numerous projectile points and butchered large animal bones. Animals that were hunted likely consisted of mostly large species still alive today. Bones of extinct species have been found, but cannot definitely be associated with human artifacts. Although small animal bones and plant grinding tools are rarely found within archaeological sites of this period, small game and vegetal foods were probably exploited on a limited basis. A lack of deep cultural deposits from this period suggests that groups included only small numbers of individuals who did not often stay in one place for extended periods (Wallace 1978).

Around 6,000 years BP, there was a shift in focus from hunting towards a greater reliance on vegetal resources. Archaeological evidence of this trend consists of a much greater number of milling tools (e.g., metates and manos) for processing seeds and other vegetable matter. This period, which extended until around 3,000 years BP, is sometimes referred to as the “Millingstone Horizon” (Wallace 1978). Projectile points are found in archaeological sites from this period, but they are far fewer in number than from sites dating to before 6,000 years BP. An increase in the size of groups and the stability of settlements is indicated by deep, extensive middens at some sites from this period (Wallace 1978).

In sites dating to after about 3,000 years BP, archaeological evidence indicates that reliance on both plant gathering and hunting continued as in the previous period, with more specialized adaptation to particular environments. Mortars and pestles were added to metates and manos for grinding seeds and other vegetable material. Chipped-stone tools became more refined and specialized, and bone tools were more common. During this period, new peoples from the Great Basin began entering southern California. These immigrants, who spoke a language of the Uto-Aztecan linguistic stock, seem to have displaced or absorbed the earlier population of Hokan-speaking peoples. The exact time of their entry into the region is not known; however, they were present in southern California during the final phase of prehistory. During this period, known as the “Late Horizon,” population densities were higher than before and settlement became concentrated in villages and communities along the coast and interior valleys (Erlandson 1994; McCawley 1996). Regional subcultures also started to develop, each with its own geographical territory and language or dialect (Kroeber 1925; McCawley 1996; Moratto 1984). These were most likely the basis for the groups encountered by the first Europeans during the eighteenth century (Wallace 1978). Despite the regional differences, many material culture traits were shared among groups, indicating a great deal of interaction (Erlandson 1994). The introduction of the bow and arrow into the region sometime around 1,500 to 1,000 years BP is indicated by the presence of small projectile points (Moratto 1984).

ETHNOGRAPHY

TONGVA (GABRIELINO)

The term “Gabrielino” came from the group’s association with Mission San Gabriel Arcangel, established in 1771. However, today the group prefers to be known by their ancestral name Tongva. The Tongva were thought to be the “wealthiest, most populous, and powerful ethnic nationality in aboriginal Southern California” (Bean and Smith 1978:538), second only to their northwestern neighbors the Chumash. The Tongva occupied a large territory including the Pacific coast from Malibu to Aliso Creek; parts of the Santa Monica and Santa Ana Mountains; the Los Angeles, San Gabriel and Santa Ana River drainages; plus the islands of Santa Barbara, Santa Catalina, and San Clemente. It is possible that the area was used by a number of groups during the sixteenth through the nineteenth centuries although the Tongva may have been the controlling group.
The Tongva were a hunter-gatherer population exploiting local resources. They occupied numerous villages with populations ranging from 50 to 200 inhabitants. Residential structures within the villages were domed, circular, and made from thatched tule or other available wood. Tongva society was organized by kinship groups, with each group composed of several related families, who together owned hunting and gathering territories. Settlement patterns varied according to the availability of floral and faunal resources (Bean and Smith 1978; McCawley 1996; Miller 1991).

Vegetal staples consisted of acorns, chia, seeds, piñon nuts, sage, cacti, roots, and bulbs. Animals hunted included deer, antelope, coyote, rabbits, squirrels, rodents, birds, and snakes. The Tongva also fished (Bean and Smith 1978; McCawley 1996; Miller 1991).

By the late eighteenth century, Tongva population had significantly dwindled due to introduced diseases and dietary deficiencies. Tongva communities near the missions disintegrated as individuals, succumbed to Spanish control, fled the region, or died. Later, many of the Tongva fell into indentured servitude to Anglo-Americans. By the early 1900s, few Tongva people had survived and much of their culture had been lost (Bean and Smith 1978; McCawley 1996; Miller 1991). However, in the 1970s, a revival of the Tongva culture began which continues today with growing interest and support.

HISTORY

The first significant European settlement of California began during the Spanish Period (1769 to 1821) when 21 missions and 4 presidios were established between San Diego and Sonoma. Although located primarily along the coast, the missions dominated economic and political life over the majority of the California region. The purpose of the missions was primarily Indian control and forced assimilation into Spanish society and Catholicism, along with economic support to the presidios (Castillo 1978).

The Mexican Period (1821-1848) began with the success of the Mexican Revolution in 1821, but changes to the mission system were slow to follow. When secularization of the missions occurred in the 1830s, the vast land holdings of the missions in California were divided into large land grants called ranchos. The Mexican government granted ranchos throughout California to Spanish and Hispanic soldiers and settlers (Castillo 1978; Cleland 1941).

In 1848, the Treaty of Guadalupe Hidalgo ended the Mexican-American War and marked the beginning of the American Period (1848 to present). The discovery of gold that same year sparked the 1849 California Gold Rush, bringing thousands of miners and settlers to California from various parts of the United States, most of whom settled in the north. For those settlers who chose to come to southern California, much of their economic prosperity was fueled by cattle ranching rather than by gold. This prosperity, however, came to a halt in the 1860s as a result of severe floods and droughts, which put many ranchos into bankruptcy (Castillo 1978; Cleland 1941).

The first known European visitor to the Los Angeles basin was Juan Rodriguez Cabrillo in 1542 followed by Gaspar de Portola and missionary Juan Crespi in 1769. The Mission San Gabriel Archangel was built by friar Juniparo Serra in 1771 and the El Pueblo de Nuestra Señora la Reina de los Ángeles del Río de Porciúncula (The Town of Our Lady the Queen of the Angels on the Porciúncula River) or the City of Los Angeles was founded in September 1781 by Felipe de Neve as part of the Spanish settlements. The remainder of the Spanish Period saw a decline in the development of the area which became part of Mexico in 1821. Governor Pio Pico declared the pueblo as the capital of Mexican Alta California and this location is now the Los Angeles Pueblo Plaza. The American period brought drastic changes to the city with the development of railroad starting in 1876, the oil business and development of the ports at Huntington and San Pedro, major water and electric facilities and real estate ventures. In the 1920’s the movie and aviation industries buffered the effects of the great Depression and followed by urban sprawl and development known today.
HISTORY OF VENICE BEACH AND MARINA DEL REY

Venice Beach was established as a resort town in 1905 by Abbot Kinney, a tobacco millionaire who built canals to drain the land for development and to provide a recreational area including gondola rides. The Red Line of Pacific Electric Railway ran to Venice from Los Angeles where people came to Kinneys Pier for amusement rides including roller coaster, and the beach. Various piers were built at the beaches including the Pickering Pier in Ocean Beach (the early name for Venice) and Lick Pier.

In the 1920s Venice became part of Los Angeles to help with city maintenance. In 1929 oil was discovered and 450 oil rigs were placed in the area. The sludge and oil spilled from the oil rigs into the already deteriorating canals, and Venice lost much of its prior charm becoming a run-down town in the 1950s. However, the idea of the amusement piers continued, as the Lick Pier in Santa Monica does today, bringing tourists to the area.

Originally part of the historic Rancho Ballona (Paso de las Carretas Grant) of 1839, Marina del Rey was conceived of in 1887 as part of a land and harbor development associated with the Santa Fe Railroad. At this time M.C. Wicks developed the Port Ballona Development Company to develop the area but went bankrupt in around 1890. A 1916 report by the Army Corps of Engineers found a major harbor development impractical, but a 1949 report approved a pleasure craft harbor for the area which was then partially federally funded in 1954. After several construction delays, the Marina del Rey Harbor was dedicated on April 10, 1965. Marina del Rey remains a hub of business, tourist and recreational activities (McKenna et al. 2006).

METHODS

CULTURAL RESOURCES RECORD SEARCH AND LITERATURE REVIEW

A cultural resources records search and literature review was conducted at the South Central Coastal Information Center (SCCIC) located at California State University in Fullerton on September 21, 2010. The SCCIC is a branch of the California Historic Resources Information System (CHRIS) established by the Office of Historic Preservation (OHP) and maintains information concerning cultural resources and associated studies recorded in their respective counties. The records search provides information on archaeological sites, historic resources, and cultural resources investigations recorded within a one-half mile radius surrounding the subject property.

Chambers also contacted the Native American Heritage Commission (NAHC) on and they search their files for any traditional cultural properties that had been recorded within the study area boundaries (Appendix A).

ARCHAEOLOGICAL FIELD SURVEY

On January 6, 2011, a Chambers archaeologist conducted an intensive pedestrian survey of the subject property. Notes were recorded on the environmental setting, disturbances, and any cultural resources observed. No artifacts were collected during the survey.
CULTURAL RESOURCES RECORD SEARCH /LITERATURE

A cultural resources records search was conducted at the South Central Coastal Information Center (SCCIC) located at California State University in Fullerton on September 21, 2010. The SCCIC acts is branch of the California Historic Resources Information System (CHRIS) established by the Office of Historic Preservation (OHP) and maintains information concerning cultural resources and associated studies recorded in their respective counties. The records search provides information on archaeological sites, historic resources, and cultural resources investigations recorded within a one-half mile radius surrounding the subject property. During the records search, the OHP’s Historic Property Data File (HPDF), as well as a variety of publications and manuscripts were consulted. The HPDF includes the following types of properties:

- National Register of Historic Places (NRHP);
- California Historical Landmarks (CHL);
- California Points of Historical Interest (PHI); and
- California Register of Historical Resources (CRHR).

Results of the records search did not identify any previous cultural resources studies anywhere within the boundaries of the project area, nor are there any previously recorded prehistoric or historic sites listed. Upon reviewing these sources, it was determined that no NRHP, CHL, PHI, or CRHR properties were recorded on or near the subject property.

The site location maps show that 27 cultural resource technical studies have been conducted within a one-half mile radius of the subject property. Of those, one abuts the subject property at the western edge. This is described below; the remainder will not be discussed herein.

The study was conducted in support of a residential/retail development undertaking on approximately 2.11-acres and borders the subject project area along its western edge (McKenna et al. 2006a). The study produced negative results for any evidence of prehistoric resources (ibid.). However, McKenna does mention the proximity of the old Venice Beach landfill as being “peripheral” (McKenna 2006, p.20) to the 2.11 acre property and thus potentially near to the subject property as well. Figure 3 shows the location of the Venice dump. It is noted in the Los Angeles Times article of March 26, 1961 that “Venice Dump Hauling Set for Tuesday” indicates the dump was removed during the construction of the marinas and retention basin in the early 1960’s.

A review of site location maps at by SCCIC showed that no archaeological sites were recorded on the subject property and three archaeological sites, The consist of CA-LAN-47 the Admiralty Site (Johnson 1961) and CA-LAN-337 (Romoli 1965), and a historic-period refuse scatter, CA-LAN-1596H the Channel Gateway Site (Troncone 1989) representing a Japanese Farm Labor Camp (Wlodarski 1997)) are located within the one-half mile radius of the subject property. All three sites are located roughly one-half mile to the east of the subject project area.

TRIBAL NOTIFICATION LETTERS

Chambers contacted the NAHC, and requested a search of their files for any traditional cultural properties that had been recorded within the study area boundaries (Appendix A).
SURVEY RESULTS

DISTURBANCES

The entire property has been heavily disturbed by construction activities. Fill material, imported from dredging of Marina del Rey harbor covers the entire property. Currently, a contoured, earthen water retention basin occupies the majority of the subject property with landscaped area surrounding the basin, and structural facilities are located on the north central portion on the southwest side and the eastern portions of the property. No native sediments were distinguishable in project area. Recent trash is scattered across most of the shoreline (Figure 4). Vegetation over the entire subject property consists of sparse intrusive weeds and several ornamental trees.
CULTURAL RESOURCES FIELD SURVEY

One historic site, possibly with two components, was identified in the subject property during the survey and was recorded (Temporary # OB-1-1611). The site location map is provided in confidential Appendix B and Site Form in Appendix C. This site consists of a sparse historic debris scatter associated with the old Venice dump, and small foundation features probably associated with earlier structures relating to the Oxford retention basin itself.

The historic scatter consists of glass, ceramic, bricks, concrete chunks, terra cotta pipe fragments, asphalt chunks, stoneware tile with light green grey glaze, and one grommet. Glass consisted of brown, light green (Coke), clear, dark blue (cosmetic), milk glass (Noxema jar), and dark green (like 7-UP). The clear glass ranged from bottles to possibly drinking glass fragments. One fragment of a vase made of fine light green glass was noted. Ceramics included stoneware, porcelain (faucet handle and toilet fragments) and Fiesta ware dinner ware or cups of light green, yellow, blue, and pink, and one plate fragment of stoneware with light yellow glaze and scalloped edging. One fragment of willow ware china was noted. All glass and ceramic fragments and shards were small and only two diagnostic pieces were noted.

One area had a slightly more dense artifact concentration (Concentration 1)(Figure 5) located on the southeast side of the basin, and included clear glass bottle neck (IMAC 25), stoneware shards, and whiteware (one bowl fragment exhibits pressed on decal geometric design and one with aqua craze glazing), stoneware tile with light green grey glaze, on fragment of bubble design molded glass,). Only two diagnostic artifacts were noted. Artifact 1 is a glass bottle base with makers marks-K-7348 with a 2 in a circle and 21, and Artifact 2 is a base of a ceramic dinnerware plate with “POXON CHINA VERNON CALIFORNIA” on the base (Figures 6 and 7).
The artifact scatter extends generally around the entire basin area within the project area, but was only visible along the shore line and upslope, since more of the level project area has dense grass at street level. The relatively even distribution of the artifacts suggests mixing and redistribution probably during construction of the basin in 1961.

Modern trash covered much of the shoreline and slopes. Mixing of concrete and asphalt chunks suggested recent dumping, but some appeared to have been placed around trees. Much of the concrete has large pebble to cobble sized inclusions. The array of artifacts was limited (no cans or metal artifacts for example) suggesting only a remnant of the dump remains.

Three features are present, a retaining wall or slab (Feature 1)(Figure 8), and to be two foundations with 11” high walls which possibly once held some sort of small garden structure or were possibly flower beds (Features 2 and 3) (Figures 9 and 10). These features may be associated with landscaping or other similar maintenance activity since both features have pipe fixtures. In both cases manhole (Figure 11) were located nearby and may have been associated with the structures, but a third manhole located on the property did not appear to be associated with any features.

Feature 1 is a retaining wall segment or slab measuring approximately 16 ft long and unknown width or thickness, consisting of concrete with cobble inclusions, and was located near to Feature 2.

Feature 2 is a foundation with measuring 5’ 9” by 11’ with an 11” high wall and also had additional concrete slabs to the north, one having a half circle shaped measuring approximately 3’8” by 5’, and a second an amorphous shaped area measuring 10’ by 11’. The concrete was medium fine grained with small pebble inclusions. The wall segments were finished on the top and rounded. The larger area had pipe fixtures in the interior. Feature 3 was of similar construction as Feature 2 and was rectangular, measuring 5’7” by 11’ with pipe fixtures in the interior.

The basin site may be a remnant of the old Venice dump removed prior to the basin construction sometime around 1961. The artifacts are highly mixed with no distinctive clustering, except for one minor concentration, suggesting grading and repacking of mixed soils was likely. There is a possibility of intact subsurface deposits nearby, but since the basin has been graded and re-compacted it is less likely.
Figure 7. Artifact 2

Figure 8. Feature 1 Wall or Slab
Figure 9. Feature 2 Structure foundation/garden feature

Figure 10. Feature 3 Structure foundation/garden feature
The two structural foundations (Features 2 and 3) are likely to have been associated with a small garden or maintenance structure. Feature 1 is either a retaining wall or slab.

The historic site is clearly associated with the dump prior to construction of the marina basin, but lacks density, diversity and integrity and is therefore recommended not significant under CEQA guidelines.

DISCUSSION/ RECOMMENDATIONS

This inventory shows that no previous studies have been conducted within the subject property. One previous study was conduct on adjacent property on the west with negative results.

The cultural resources records searches, consisting of archaeological and historical records, the pedestrian survey, and the observable extent of ground surface over all of the property suggest no prehistoric cultural resources are likely to be discovered in a surface or shallow subsurface context within the landfill soils. Given the depositional environment in which the subject property is located, cultural resources consisting of prehistoric artifacts could be discovered if excavation occurs at a sufficient depth to encounter native sediments. However, a number of studies indicate the general area is sensitive for prehistoric and/or historic-period cultural resources (Greenwood and Foster 1980; Rosen 1974; Foster 2004; McKenna et al. 2006). In addition, the presence of the old Venice dump in this location suggests the possibility of some intact deposits remaining.

If Cultural Resources, including archaeological sites are identified on the subject property during monitoring, an archaeological would be necessary to determine if the resource is an “historical resource” as defined under Section 15064.5 of the State CEQA Guidelines.
Any object, building, structure, site, area, place, record, or manuscript 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 may be considered to be an historic resource provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) 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

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

Typically, archaeological sites are found eligible for the California Register under Section 15064.5 (a)(3)(D): Has yielded, or may be likely to yield, information important in prehistory or history.

If the resource is determined to be a historical resource under CEQA, then 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. If a site qualifies as a historical resource under one or more of these criteria, then adverse effects to those historical resources must be considered when mitigating the effects of the project on the environment. Mitigation measures can then be developed that will offset the effects to the resource and, therefore, the environment:

- Chambers recommends a qualified cultural resources monitor be onsite periodically to check for potential intact historic deposits associated with the Venice dump during ground disturbing activities, and for prehistoric deposits whenever construction excavations occur in native sediments. The grading permit or contract should contain a clause regarding the appropriate actions to be taken in the event that any subsurface archaeological deposits are unearthed during ground-disturbing construction activities. In that event, all activities must be suspended in the vicinity of the find until the deposit(s) are recorded and evaluated by a qualified archaeologist. If human remains of any kind are found, all activities must cease immediately and the Los Angeles County Coroner and a qualified archaeologist must be notified. If the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission (NAHC). The NAHC will then identify the most likely descendants to be consulted regarding treatment and/or repatriation of the remains.

Chambers recommends that the implementation of these mitigation measures would reduce the adverse effects to a level of less than significant.
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Subject: Proposed Oxford Retention Basin Multiuse Enhancement Project, Marina De Rey, County of Los Angeles, California

Dear Mr. Singleton,

We are requesting on behalf of our client that a review of the Sacred Lands file for our Oxford Retention Basin Multiuse Enhancement Project, located in the Marina Del Rey area of the County of Los Angeles, California.

The table below contains details of the location of the proposed project. The location has also been plotted on a USGS 7.5’ quadrangle sheet, and is enclosed.

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<td>Oxford Retention Bas</td>
<td>Marina Del Re</td>
<td>Los Ange</td>
<td>Venice</td>
<td>T2S R15W</td>
</tr>
</tbody>
</table>

Along with the Sacred Lands file review for the proposed project location please also identify any Federally-recognized Native American groups or representatives to contact for consultation regarding the proposed project.

For correspondence, please use the project reference number 20199. If you have any questions regarding this request, please contact me at (949) 261-5414 or dsmith@chambersgroupinc.com

Sincerely,

Chambers Group, Inc.

David Smith, MA, RPA

Enclosures: as stated
CONFIDENTIAL APPENDIX B – MAPS