

# Polytechnic High School Transformation Project Cultural Resources Survey Results Letter Report

LONG BEACH UNIFIED SCHOOL DISTRICT



March 12, 2024  
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(21440)

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**Subject: Cultural Resources Survey Results Letter Report for the Polytechnic High School Transformation Project**

Dear Ms. Ferdows Fazeli:

Chambers Group provides the following Cultural Resources Survey Results Letter Report to the Long Beach Unified School District (LBUSD) for the Polytechnic High (Poly High) School Transformation Project (Project) in the City of Long Beach in Los Angeles County, California (Figure 1). This assessment includes the results of a cultural resources records search and literature review of the Project site and surrounding half-mile radius (study area) and a Cultural Resources Phase I Pedestrian Survey (Survey). These tasks were conducted to determine the presence of and potential for prehistoric and/or historic cultural resources within the Project site and to assess the potential for impacts to those resources from Project activities in compliance with applicable County, State, and federal codes, regulations, and statutes.

The Cultural Resources Survey, as conducted, was negative and no evidence of new or previously documented cultural resources was observed in the Project site.

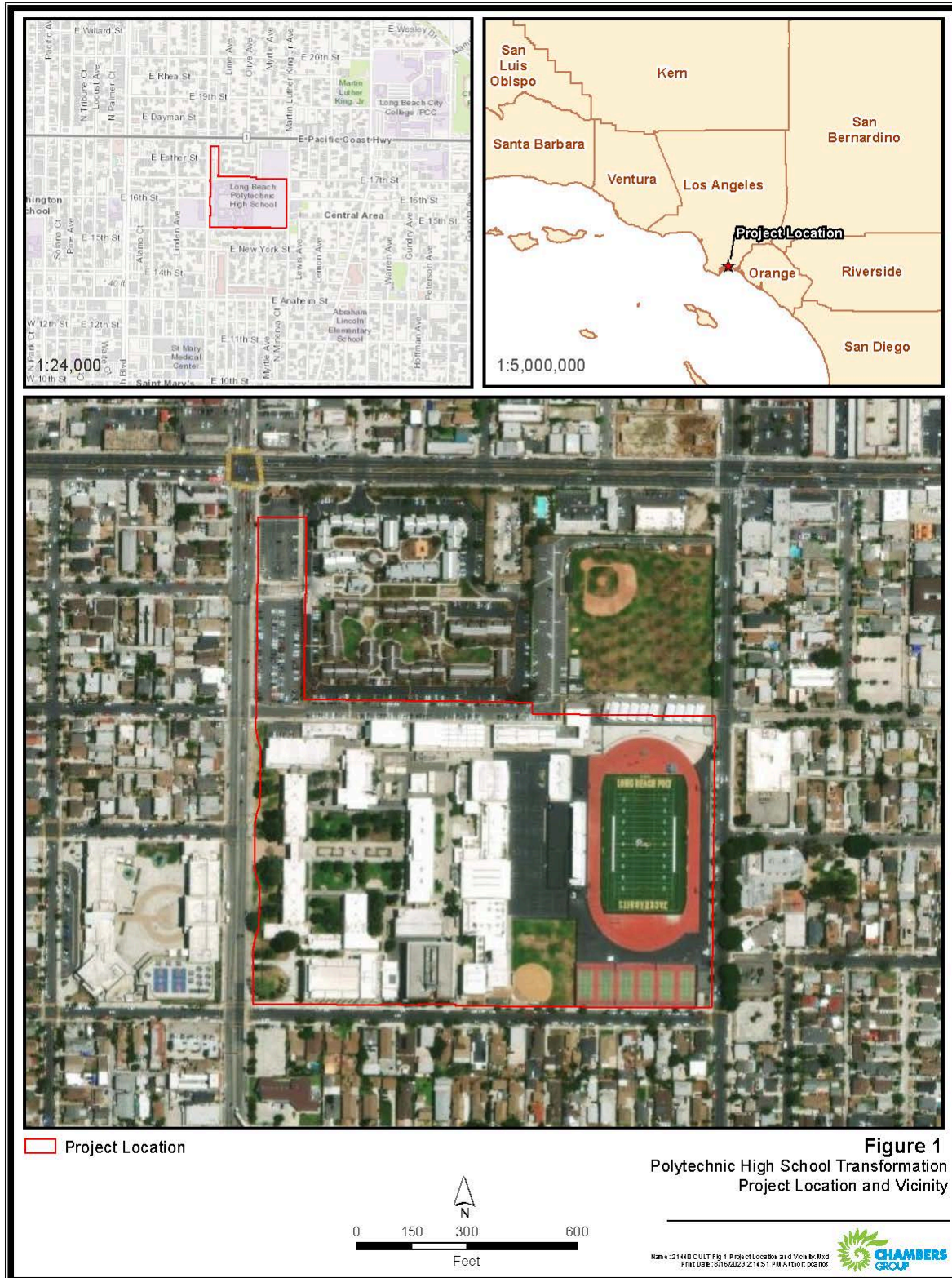
## Proposed Project Site Location and Description

Polytechnic High is an existing 26-acre school site located at 1600 Atlantic Avenue, Long Beach, California 90813 and is situated in a residential area (Figure 1). The school was originally constructed in the 1930's with additions and buildings added in the 1950s through the 1980s and continues into 2024. The campus is undergoing modernization, starting in 2014 to implement the master plan to replace aging buildings with new ones and modernize buildings when feasible.

The Project will be constructed over two phases. The first phase (summer 2025 through winter 2027) will see the construction of a three-story classroom building, along with HVAC and technology modernization in seven existing buildings. The second phase (winter 2027 through summer 2030) will see the demolition of seven existing buildings, the construction of a new drama/band building (building 150), a three-story classroom building (building 1000), a two-story gymnasium building (building 800), an aquatic center with a pool and support facilities (Building 850), a two-story administration/classroom/wellness building (building 700), a new baseball field and student drop pick up and drop off along Jack Rabbit Lane..

The Proposed Project site is found on the United States Geological Survey (USGS) Long Beach, California 7.5-minute topographic quadrangle, in Township 4 South, Range 12 West (USGS 2021) and within Assessor Parcel Number (APN) 7268-007-905.





## Regulatory Framework

As the lead agency for the Project, the City is required by the State of California to comply with the provisions of the California Environmental Quality Act (CEQA), which requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC] Section 21084.1). The regulatory framework as it pertains to cultural resources under CEQA has been detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC §§ 21083.2 and 21084.1), the CEQA Guidelines (Title 14 California Code of Regulations [CCR] § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for eligibility for listing in the California Register of Historical Resources (CRHR).

### California Register of Historical Resources

A cultural resource is considered “historically significant” under CEQA if the resource meets one or more of the criteria for listing on the CRHR. The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

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.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the California Register must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a “unique archeological resource” as defined in PRC §21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:

- 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 that 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
  - Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a “unique archaeological resource” under CEQA PRC §21083.2 are viewed as not significant. Under CEQA, “A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” (PRC §21083.2[h]).



Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts on historical resources from a proposed project are thus considered significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

### Assembly Bill 52

Assembly Bill (AB) 52 was enacted in 2015 and expands CEQA by defining a new resource category: tribal cultural resources. AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency. It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and meets either of the following criteria:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 (in applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe)

### Environmental Setting

The Project site is located in the Peninsular Ranges geomorphic province, within the western inland portion of the actively subsiding Los Angeles Basin. This basin is bound by the Santa Monica and San Gabriel Mountains to the north, the Santa Ana Mountains to the east, and the Palos Verdes Hills to the south (Yerkes et al. 1965). Geologic units underlying the Project site are Holocene and late Pleistocene-age deposits (Saucedo et al. 2016). Soils of the Project site are mapped as Urban Land, derived from the Windfetch-Typic Haploxerolls complex, with 0-2 percent slopes (UC Davis SoilWeb 2023).

The Project site is situated atop a geologic formation of Pleistocene to Holocene-age structures comprised largely of marine and non-marine older alluvium, lake, playa, and terrace deposits; this includes both unconsolidated and semi-consolidated (Jennings 2010; California Department of Conservation 2023). In southern California, the middle Pleistocene is generally associated with a pre-human presence, although recent research suggests early human exploration of North America earlier in the Late Pleistocene than previously documented. Fossil specimens are also associated with the Pleistocene epoch, particularly in areas where deposits are referred to as “older Alluvium.” The Holocene is the most recent geologic period and one that is directly associated with human activity. The Holocene is also generally associated with “younger Alluvium,” which tends not to be fossil-bearing, except in instances where fossils have been redeposited.



## Cultural Setting

### Prehistoric Overview

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all or portions of southern California (Moratto 1984; Jones and Klar 2007). A prehistoric chronology was devised for the southern California coastal region based on early studies and focused on data synthesis that included four horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric (Wallace 1955, 1978). Though initially lacking the chronological precision of absolute dates (Moratto 1984:159), Wallace's 1955 synthesis has been modified and improved using thousands of radiocarbon dates obtained by southern California researchers over recent decades (Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2002). The prehistoric chronological sequence for southern California presented below is a composite based on Wallace (1955) and Warren (1968) as well as later studies, including Koerper and Drover (1983).

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 and gathering economy existed, characterized by archaeological sites containing numerous projectile points and butchered large animal bones. The most heavily exploited species were likely those species still alive today. Bones of extinct species have been found but cannot definitively be associated with human artifacts in California, unlike other regions of the continent. Although small animal bones and plant grinding tools are rarely found within archaeological sites of this period, small game and vegetal foods were likely exploited. A lack of deep cultural deposits from this period suggests small groups practiced high residential mobility during this period (Wallace 1978).

The three major periods of prehistory for the greater Los Angeles Basin region have been refined by recent research using radiocarbon dates from archaeological sites in coastal southern California (Koerper and Drover 1983; Mason and Peterson 1994):

- Millingstone Period (6,000–1,000 B.C., or about 8,000–3,000 years ago)
- Intermediate Period (1,000 B.C.–A.D. 650, or 3,000–1,350 years ago)
- Late Prehistoric Period (A.D. 650–about A.D. 1800, or 1,350–200 years ago)

Around 6,000 years BP, a shift in focus from hunting toward a greater reliance on vegetal resources occurred. 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 (Wallace 1978). This period, known to archaeologists as the Millingstone Period, was a long period of time characterized by small, mobile groups that likely relied on a seasonal round of settlements that included both inland and coastal residential bases. Seeds from sage and grasses, rather than acorns, provided calories and carbohydrates. Faunal remains from sites dating to this period indicate similar animals were hunted. Inland Millingstone sites are characterized by numerous manos, metates, and hammerstones. Shell middens are common at coastal Millingstone sites. Coarse-grained lithic materials, such as quartzite and rhyolite, are more common than fine-grained materials in flaked stone tools from this time. 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 post-dating roughly 3,000 years BP, archaeological evidence indicates the reliance on both plant gathering and hunting continued but was more specialized and locally adapted 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, population densities were higher than before; and settlement became concentrated in villages and communities along the coast and interior valleys (Erlandson 1994; McCawley 1996). During the Intermediate Period, mortars and pestles appeared, indicating the beginning of acorn exploitation. Use of the acorn – a high-calorie, storable food source – probably facilitated greater sedentism and increased social organization. Large projectile points from archaeological sites of this period indicate that the bow and arrow, a hallmark of the Late Prehistoric Period, had not yet been introduced; and hunting was likely accomplished using the *atlatl* (spear thrower) instead. Settlement patterns during this time are not well understood. The semi-sedentary settlement pattern characteristic of the Late Prehistoric Period may have begun during the Intermediate Period, although territoriality may not yet have developed because of lower population densities. 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 Late Prehistoric Period is better understood than earlier periods largely through ethnographic analogy made possible by ethnographic and anthropological research of the descendants of these groups in the late nineteenth and early twentieth centuries.

### Ethnographic Overview

The Proposed Project is located within an area of the City of Long Beach identified as part of Gabrielino traditional territory. In addition, the Juaneño or Acjachemen suggest that the areas immediately east and south of the Proposed Project are part of their traditional territory.

### Gabrielino

The Gabrielino (sometimes spelled Gabrieliño, Gabrieleno or Gabrieleño), are Cupan speakers. The Cupan languages are part of the Takic family, which is part of the Uto-Aztecan linguistic stock. Their tribal territory included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, all of the Los Angeles Basin, the coast from Aliso Creek in the south to Topanga Creek in the north, and the islands of San Clemente, San Nicholas, and Santa Catalina. Villages or triblets were politically autonomous and made up of different lineages. Each lineage had its own leader and would seasonally leave the village to collect resource items (Bean and Smith 1978). Tribal boundaries were not fixed and overlapped with neighboring people, including Chumash (Barbareño, Ventureño, Purisimeño, Obispeño, Ineseño, Cruzeño, Emigdiano, and the Cuyama Chumash), Fernandeseño Tataviam, Serrano, Cahuilla, Acjachemen (Juaneño), and Luiseño cultural groups. These overlaps historically have been a source of confusion, contest, conflict, and opportunity, which has persisted to this day.

During the Spanish missionization period, people from the greater area would have been incorporated into the San Gabriel mission. Whether they were Serrano, Cahuilla, Fernandeseño Tataviam, Chumash or local Gabrielino, all would have been identified as Gabrielino, or as belonging to Mission San Gabriel. Indeed, even Fernandeseño people have been collectively grouped within Gabrielino ethnographic treatments. Today, the Fernandeseño people, the Gabrieleño Band of Mission Indians-Kihz Nation, and the Gabrielino-Tongva Indian Tribe identify as individual groups.

### Juaneño/Acjachemen

The Juaneño, or Acjachemen, are members of the Takic-speaking group that includes Gabrielino, Luiseño, Cupan, and Cahuilla, among others, and are named after the Spanish mission at San Juan Capistrano (Bean and Shipek 1978). The degree to which the Acjachemen are related to their Gabrielino neighbors to the north, or their Luiseño neighbors to the south and east is debated. Bean and Shipek (1978) essentially subsume the Juaneño within the greater Luiseño discussion, while others (e.g., Kroeber 1925, Harrington, n.d., cited in Koerper and Mason 2004) suggest an affinity with the Gabrielino. Nevertheless, Juaneño or Acjachemen territory generally ranged between Las Flores creek in the south, to Aliso Creek in the north, and from the coast, across the Santa Ana Mountains, to Temescal Valley in the east.



The Acjachemen practiced a semi-sedentary hunting and gathering subsistence strategy, with a focus on well-watered drainage systems that allowed seasonally available resources (Koerper and Mason 2004). One of the most important food resources for the group was hard seeds. The availability of seed as a staple may have been a determinant as to when the group moved or split apart into smaller units in other parts of the territory (Koerper and Mason 2004). Additionally, acorns were gathered from oak groves in canyons, drainages, and foothills. Acorns were ground into flour using mortars and pestles. Protein was supplemented through the meat of deer, rabbits, and other animals, hunted with the bow and arrow, or trapped. Shellfish were collected and eaten, and the shell was then used to make hooks for fishing, beads, and other ornaments (Bean and Shipek 1978).

Accurate population figures remain elusive; however, villages may have contained up to 300 people at certain times of the year. These tended to be located near permanent water and a variety of food sources. The San Juan Basin was densely populated, and villages were closely spaced because of the year-round availability of fresh water in San Juan Creek. Each village was typically located in the center of an established area from which resources for the group were gathered, usually within a day's journey. Subsequently, small groups would leave the village for a short time to hunt fish or gather plant materials (Bean and Shipek 1978).

### Historic Overview

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1540–1822), the Mexican Period (1822–1848), and the American Period (1848– present). Briefly, and in very general terms, the Spanish Period encompassed the earliest historic-period explorations of the West, followed by colonization, missionization, and proselytization across the western frontier later during their occupation. The Spanish Period witnessed the establishment of pueblos such as Los Angeles and Monterey and a line of missions and presidios with attendant satellite communities, minor prospecting, and a foundational economic structure based on nascent ranchos and cattle herds, and a ship-based trade and exchange system. The Mexican Period initiated with a continuation of the same Spanish structures; however, commensurate with the political changes that led to the establishment of the Mexican state the missions and presidios were secularized, the lands parceled into ranchos, and Indian laborers released from Church lands only to be conscripted into the ranchos. Increased global trade introduced both foreign and American actors into the Mexican economic and political spheres, both coincidentally and purposefully, smoothing the transition to the American Period. The American Period was ushered in, following the conclusion of the Mexican-American War of 1846, with a momentous influx of people seeking fortune in the Sierra foothills where gold was “discovered” in 1848. By the early 1850s people from all over the globe had made their way to California. Expansive industries were required to supply the early mining operations, such as forestry products and food networks. Grains, poultry, cattle, and water systems, which were initiated in the early Mexican Period, were intensified into a broad system of ranches and supply networks. Additionally, this period witnessed the development and expansion of port cities to supply hard goods and clothes, animals, and people that migrated and transported along improved trail and road networks throughout the interior regions of the state. California cycled through boom and bust for several decades until World War I when the Department of the Navy began porting warships along the west coast. Subsequently, California has grown, and contracted, predominantly around military policy along the west coast, and the Pacific Ocean. Following the industrial expansion related to World War II and the Cold War, technology and systems associated have come to the fore as economic drivers.

### City of Long Beach

The chronology of school construction in LBUSD mirrors the growth and development of the City of Long Beach. The first school in Long Beach, located near Willow Street and Santa Fe Avenue, was founded in 1879 by the eleven families who constituted the American Colony. A year later, William E. Willmore established his town site the “American Colony” or “Willmore City.” In 1885, the LBUSD was established. The first Board of Trustees was elected and consisted of John W. Bixby, A.M. Hough, and Frank C. Butler. The same year, the first school in the newly formed LBUSD was established by Mrs. John Bixby and Belle Lowe (PCR 2015).



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The present City of Long Beach is located on a portion of the 300,000 acres of land granted to Manuel Nieto by the Spanish colonial government in 1784. This property would subsequently be divided into five smaller land grants, including Rancho Los Alamitos and Rancho Cerritos, on which Long Beach would later be established. Rancho Los Alamitos was purchased in 1840 by real estate speculator and cattleman Abel Stearns, who was in the process of amassing one of the largest landholdings in southern California, known collectively as Stearn's Ranchos. Rancho Cerritos was purchased in 1843 by Los Angeles merchant John Temple. The two ranchos owned by Stearns and Temple would later be sold to Jotham Bixby (PCR 2015).

The town site was purchased in 1884 by the Long Beach Land and Water Company, which began making significant improvements, including the construction of a wharf and hotel, and connecting the town to the Southern Pacific Railroad's Wilmington branch line. With the elements for growth now in place, the expansion was vast, especially after the opening of a Pacific Electric line to the city in 1902. Long Beach, which in the early 1900s had become one of the region's seaside resort towns, was incorporated as a city in 1908. The discovery of oil in 1921 and the construction of a modern harbor between 1925 and 1930 sparked a boom in the building industry in Long Beach, including associated residential, commercial, and industrial development. The demand for housing and the availability of capital resulted in the redevelopment of part of the downtown shoreline with apartment hotels (PCR 2015).

The stock market crash in 1929 and the 1933 earthquake had a damaging impact on the built environment, both financial and physical. In 1935, thanks to funding from the federal Works Progress Administration, parks and transportation facilities, and civic and recreational buildings in the city were reconstructed. In addition, the Federal Art Project subsidized art, literature, music, and drama and engaged public artists, producing a legacy of public art in Long Beach. By 1940, the local economy was sufficiently reinvigorated by the oil and air transportation industries. After 1941, the wartime defense industry served to fully restore it, unlike many southern California communities, which only truly rebounded in the postwar period. When residential and commercial construction resumed after the war, outlying areas of Long Beach experienced rapid growth during the latter part of the 1940s and through the 1950s to accommodate the increasing population and resulting generation of baby boomers (PCR 2015).

Brown vs. Board of Education was a landmark Supreme Court decision in 1954 in which the Court declared state laws establishing separate schools for white and black students unconstitutional. This ruling paved the way for social integration and was a major victory of the Civil Rights Movement which peaked during the 1960s. The Brown vs. Board of Education decision, in combination with post-war economic prosperity and the "baby boom," had a profound effect on school modernization programs throughout California and Long Beach (PCR 2015).

In the post-World War II period in America, the Moderne style of architecture became the predominant pattern applied to buildings of every type. During the 1950s and 1960s, distinct and identifiable stylistic variants of Modernism evolved. The aesthetic closest to the 1920s origins of Modernism in Europe was dubbed the International Style and was identified by its rectilinear form, flat roofs, open floor plans, use of steel and glass, and lack of applied ornamentation. Local variants of Modern design, while based upon International Style tenets, were generally less formal in their expression of Modernist tenets with results that vary widely in terms of materials, form, and spatial arrangements. The features of the Post-World War II Modern style are one-story; flat or shed-roofed, often with cantilevered overhangs, stucco or brick exterior, modular planning, classrooms with glass walls on one side, and clerestory windows on the opposite side, incorporation of outdoor classrooms, and exterior corridors with roofs supported by pipe columns (PCR 2015).

As a result of the Long Beach earthquake of 1933, standards for school construction were upgraded. Older schools had been constructed of unreinforced masonry and, therefore, suffered the worst damage. Shortly after the earthquake, the Field Act was passed by the California legislature to regulate school construction. A major impetus for change in public safety policy was the fact that 70 schools were destroyed and 120 were damaged, leading to the passage of important legislation and improved design and construction practices for schools. The Field Act required that earthquake-resistant design and construction be incorporated for all public schools, kindergarten through community college. On August 29, 1933, Long Beach citizens approved a \$4,930,000 bond measure for the rebuilding of schools.



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Applications for approximately thirty-five schools were filed with the Works Progress Administration (WPA)/Public Works Administration (PWA); federal grants up to thirty percent of labor and material costs were obtained. To minimize costs, building materials were salvaged from damaged schools, some schools were rehabilitated, and new schools were constructed with basic amenities without cafeterias, libraries, auditoriums, swimming pools, or gymnasiums. Four years after the earthquake, school construction totaling \$3,281,000 was completed or under contract (PCR 2015).

In Long Beach, most damaged schools were replaced by concrete and steel WPA/PWA-style buildings between 1935 and 1936. The new building code rejected the use of lime mortar and required a structure to be able to withstand 100% lateral force in its fire walls, friezes, and cornices. Reinforced concrete was the most suitable material to meet these structural requirements. Most schools reconstructed in the wake of the earthquake exhibited the mix of classicism, Art Deco, and streamlining referred to as “WPA/PWA Moderne” (PCR 2015).

Earthquake reconstruction efforts for existing buildings encompassed foundation reinforcement, major structural reinforcement and architectural modification, replacement of plaster elements with more modern materials, removal or abrasion of exterior brick or masonry surfaces, application of gunite, and other tasks. The 1930s also witnessed the application of a variety of modern innovations to school plants, reflecting educational reforms of the time and encompassing advances in ventilation, illumination, hygiene, sanitation, school furnishings and landscaping. A new interest, grounded in California’s mild climate, was also prevalent, in one-story schools, more easily opened to the outdoors and on the provision of loggias and arcades for circulation (PCR 2015).

Poly High was originally built in the 1930s with additions and buildings added in the 1950s through the 1980s. The Mediterranean Revival Auditorium, designed by architect John C. Austin, was largely destroyed by the 1933 Long Beach earthquake, along with most of the other masonry buildings on campus. Redesigned by architect Hugh Davies in 1935, the WPA/PWA Moderne style Auditorium incorporates design elements from both Streamline Moderne and Art Deco. Poly High consists of 401,436 square feet of permanent buildings and 9,600 square feet of portable buildings.

### Methods of Review

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South-Central Coastal Information Center (SCCIC) at California State University, Fullerton on August 17, 2023. A half-mile study area was requested to provide additional context to the Project site and surrounding area and more information on which to base this review. Resources consulted during the records search conducted by the SCCIC included the National Register of Historic Places (NRHP), California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), Caltrans Historic Highway Bridge Inventory, the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historic photographs, maps, and aerial imagery. The task also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. In addition, Chambers Group submitted a request to the Native American Heritage Commission (NAHC) for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity. Results of the NAHC SLF records search are detailed below and included in Attachment 2. The results of the SCCIC records search are also detailed below and included in confidential Attachment 3.

Additionally, on August 17, 2023, Chambers Group requested a paleontological records search from the Natural History Museum of Los Angeles County (NHMLA). This information was requested with the intent to provide further context related to the paleontological setting of the area based on known fossil locations identified within the Project site and surrounding study area. The paleontological records provide insight into which associated geological formations are more likely to contain fossils as well as the associated depths and placement of the documented fossil localities relative to the geological formations mapped in the area. The results of the NHMLA records search are detailed below.

In addition to the records search review, Chambers Group archaeologists completed background research to determine if any additional historic properties, landmarks, bridges, or other potentially significant or listed properties are located within the Project site or half-mile study area. This background research included but was not limited to, the NRHP,



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California State Historic Property Data Files, California State Historical Landmarks, California Points of Historical Interest, Office of Historic Preservation Archaeological Determinations of Eligibility, historic aerial imagery accessed via NETR Online, Historic U.S. Geological Survey (USGS) topographic maps, Built Environment Resource Directory (BERD), and California Department of Transportation (Caltrans) State and Local Bridge Surveys. Additionally, Chambers Group archaeologists reviewed the Los Angeles County Historical Landmarks inventory, as well as the Los Angeles Historical Society and local historical newspaper clippings via Newspapers.com, ProQuest Historical Newspapers.com, and the California Digital Newspaper Collection.

**Project Personnel**

Chambers Group Cultural Resources Department Lead Lucas Tutschulte managed the Project tasks related to cultural resources. Chambers Group cultural resources specialists Richard Shultz, MA, RPA, and Kellie Kandybowicz conducted background research and coauthored the report. Ms. Kandybowicz also conducted the survey. Additionally, Mr. Shultz served as Principal Investigator for cultural resources and performed quality control for the report.

**Cultural Resources Reports within the Study Area**

The results of the records search request were received on September 12, 2023. The CHRIS records search indicates that 17 previous cultural resource investigations have been recorded within a half-mile radius of the Project site. Of these, one investigation includes the Proposed Project site and is bolded and italicized below. The details pertaining to the investigations are listed below in Table 1 and in confidential Attachment 3.

**Table 1. Prior Cultural Resources Studies within a Half-Mile Radius of the Project Site**

SCCIC Report Number	Author(s)	Year	Study Title	Included Project site?
LA-00503	Dixon, Keith A.	1974	Archaeological Resources and Policy Recommendations of Long Beach	No
LA-02399	Winman, Lois J. and E. Gary Stickel	1978	Los Angeles-Long Beach Harbor Areas Cultural Resource Survey	No
LA-02665	Cottrell, Marie G., James N. Hill, Stephen Van Wormer, and John Cooper	1985	Cultural Resource Overview and Survey for the Los Angeles County Drainage Area Review Study	No
LA-03508	Van Wormer, Stephen R.	1985	Historical Resource Overview and Survey for the Los Angeles County Drainage Area Review Study	No
LA-05401	Duke, Curt	2000	Records Search Results for Sprint PCS Facility LA37XC778D (Rose Park Site), County of Los Angeles, CC	No



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**Table 1. Prior Cultural Resources Studies within a Half-Mile Radius of the Project Site**

SCCIC Report Number	Author(s)	Year	Study Title	Included Project site?
LA-06823	Mason, Roger D., Cary D. Cotterman, and Evelyn N. Chandler	2003	Cultural Resources Records Search and Building Evaluation Report for a Verizon Telecommunications Facility: Polytechnic in the City of Long Beach, Los Angeles County, California	No
LA-07226	Demcak, Carol R.	1998	Report of Phase I Archaeological Assessment for Proposed Atlantic / Hill Development, City of Long Beach	No
LA-08432	Bonner, Wayne H.	2004	Cultural Resource Records Search Results and Site Visit for Cingular Wireless Facility Candidate SC-562-01 (MLK Park), 1950 Lemon Avenue, Long Beach, Los Angeles County, California	No
LA-09832	Carolynn Losee	2009	Cultural Resources Analysis for T-Mobile Site Number LA33749A, "Holiday Inn" 1133 Atlantic Avenue, Long Beach, Los Angeles County, CA	No
LA-10527	Weinman, Lois J.	1978	Los Angeles-Long Beach Harbor Areas Regional Cultural History, Los Angeles County, California	No
LA-11123	Supernowicz, Dana	2008	Cultural Resources Study of the American Self Storage Project, AT&T Mobility Site NO. EL0102B, 1917 Long Beach Boulevard, Long Beach, Los Angeles County, California 90806	No
LA-11827	Ostashay, Jan	2012	HABS-Like Recordation Document, Written Historical and Descriptive Data with Large-Format Photographs, Theodore Roosevelt Elementary School	No
LA-11950	Bonner, Wayne	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC	No



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**Table 1. Prior Cultural Resources Studies within a Half-Mile Radius of the Project Site**

SCCIC Report Number	Author(s)	Year	Study Title	Included Project site?
			Candidate LA02244A (LA244 Medical Clinic), 306 East Pacific Coast Highway, Long Beach, Los Angeles County, California	
LA-12229	Bonner, Wayne and Crawford, Kathleen	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02591A (SM156 Security Storage), 1430 East Anaheim Street, Long Beach, Los Angeles County, California	No
LA-12580	Fulton, Phil and Casey Tibbet	2013	Cultural Resource Assessment Class I Inventory Verizon Wireless Services Polytechnic Facility City of Long Beach, Los Angeles County, California	No
<b>LA-12808</b>	<b><i>Chasteen, Carrie, Clark, Tiffany, Hanes, Richard, and Mirro, Michael</i></b>	<b>2014</b>	<b><i>Cultural Resources Study of the Wilmington Oil and Gas Field, Los Angeles County, California in Support of Analysis of Oil and Gas Well Stimulation Treatments in California Environmental Impact Report</i></b>	<b>Yes</b>
LA-13071	Bonner, Diane F., Carrie D. Wills, and Kathleen A. Crawford	2014	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02244A (LA244 Medical Clinic), 306 East Pacific Coast Highway, Long Beach, Los Angeles County, California	No

**Previously Recorded Cultural Resources within the Study Area**

The CHRIS records search also identified 43 previously recorded cultural resources located within a half-mile radius of the Proposed Project site. None of these resources were mapped within the Proposed Project site. The results are summarized below in Table 2 and are also illustrated in confidential Attachment 3.



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**Table 2. Previously Recorded Cultural Resources within a Half-Mile Radius of the Project Site**

Primary Number	Trinomial	Resource Type	Recorded by and Year Recorded	Resource Description	Within Project site?
P-19-000694	CA-LAN-000694	Site	1974 (Dixon)		No
P-19-004978	CA-LAN-004978H	Site	2020 (Jilian Hahnen, BFSA)	Vistas del Puerto Temp-1	No
P-19-150394	-	Building	1996 (G. Felgemaker, Long Beach Planning)	1602 Pine Ave	No
P-19-150395	-	Building	1996 (G. Felgemaker, Long Beach Planning)	1045 Olive Ave	No
P-19-187126	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 107268	No
P-19-187135	-	Building	1996 (G. Felgemaker, Long Beach Planning)		No
P-19-187145	-	Building	1996 (G. Felgemaker, Long Beach Planning);		No
P-19-187166	-	Building	1999 (G. Felgemaker, Long Beach Planning)"	Kathy Boone Home	No
P-19-187167	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187169	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122900	No
P-19-187170	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 072855	No
P-19-187179	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122898	No
P-19-187184	-	Building	1999 (G. Felgemaker, Long Beach Planning)		No
P-19-187186	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No



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**Table 2. Previously Recorded Cultural Resources within a Half-Mile Radius of the Project Site**

Primary Number	Trinomial	Resource Type	Recorded by and Year Recorded	Resource Description	Within Project site?
P-19-187188	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187193	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187194	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187197	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187198	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187206	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 117065	No
P-19-187210	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187211	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187216	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 118943	No
P-19-187221	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187225	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187226	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 123262	No
P-19-187232	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 123248	No
P-19-187233	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 123249	No



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**Table 2. Previously Recorded Cultural Resources within a Half-Mile Radius of the Project Site**

Primary Number	Trinomial	Resource Type	Recorded by and Year Recorded	Resource Description	Within Project site?
P-19-187239	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 098919	No
P-19-187246	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 123254	No
P-19-187287	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122846	No
P-19-187291	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 103347	No
P-19-187293	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122242	No
P-19-187297	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122892	No
P-19-187301	-	Building	1999 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 122847	No
P-19-187304	-	Building	1999 (G. Felgemaker, Long Beach Planning)		No
P-19-187305	-	Building	1997 (G. Felgemaker, Long Beach Planning)		No
P-19-187307	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 117075	No
P-19-187315	-	Building	1997 (G. Felgemaker, Long Beach Planning)	OHP Property Number - 124575	No
P-19-187653	-	Building	1997 (G. Felgemaker, Long Beach Planning)	Security Storage Bldg	No
P-19-189317	-	Building	2003 (C. Cotterman, Chambers Group)		No
P-19-189430	-	Building	1999	A-American Self Storage Bldg	No



**Table 2. Previously Recorded Cultural Resources within a Half-Mile Radius of the Project Site**

Primary Number	Trinomial	Resource Type	Recorded by and Year Recorded	Resource Description	Within Project site?
P-19-190081	-	Building	2008 (Dana E Supernowicz, Historic Resource Associates)	St. Albert's Medical Clinic, Enterprise Savings and Loan	No

### Background Research Results

Based on the background research and SCCIC records search results, none of these previously recorded cultural resources are documented within the Proposed Project site. LBUSD prepared a districtwide Cultural Resources Assessment to assess all potential cultural resources, both historic and prehistoric, located within all District campuses and facilities. According to the districtwide assessment, the architectural associations of Poly High School, contributing buildings (Buildings 100, 300, 400, 600, 30-auditorium), and landscape appear to rise to the threshold of significance for both the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) as a WPA Moderne-style school with a Post War Landscape. The Auditorium appears to satisfy Criterion C of the National Register: “Embodies the distinctive characteristics of a type, period, or method of construction or that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.” The Auditorium also appears to satisfy Criterion 3 of the California Register: “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” (PCR 2015).

The Poly High Auditorium was originally constructed in 1930. The Mediterranean Revival Auditorium, designed by architect John C. Austin, was largely destroyed by the 1933 Long Beach earthquake, along with most of the other masonry buildings on campus. Redesigned by architect Hugh Davies in 1935, the WPA/PWA Moderne-style Auditorium incorporates design elements from both Streamline Moderne and Art Deco (PCR 2015).

The Poly High buildings are configured in an L-shape plan with a central courtyard and are situated on 25.50 acres. The Auditorium building faces west towards Atlantic Avenue. Designed in the WPA/PWA Moderne style by Architect Hugh Davies in 1935, the contributing resources include Buildings 100, 300, 400, 600, 30 (auditorium), and landscape. The Auditorium is two-story; WPA/PWA Moderne-style exterior/Mission Revival interior; L plan and massing; reinforced concrete; flat-roof with parapet; smooth stucco exterior; central five-bay entranceway; thick concrete columns that rise from the entranceway floor to the balcony level; wide concrete staircase spans the length of the entranceway leading to the recessed opening; entranceway flooring is scored concrete with alternating integrally colored red and gray concrete panels; green wood ticketing window on the east side of the recessed entranceway; doors leading into the Auditorium are recent additions; north and south elevations divided into structural bay by tall pilasters that rise from the ground to the top of the parapet; thin vertically-aligned decorative fin at the top of pilasters; stepped formed horizontal bands between the raised pilasters (PCR 2015).

The Poly High Auditorium is unique architecturally as its period of significance (1930-1935) spans two distinct architectural traditions, the Mediterranean Revival style and the WPA Moderne style. With its intact Mediterranean Revival style lobbies, seating, and flooring it conveys the pre-earthquake identity of the LBUSD schools. While the pre-earthquake features of the Auditorium are sparse, what are left are good examples of the style. Furthermore, the WPA Moderne architecture is significant to the architectural history of the LBUSD as it was the primary design style used to



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rebuild the schools after the 1933 earthquake. The exterior of the Auditorium with its Moderne detailing is an example of the style as applied to educational buildings (PCR 2015).

Credited as being the first major architect with professional credentials to open an office in Long Beach, Horace W. Austin practiced architecture in Long Beach between 1906 and 1942. Over the years he had various partnerships with architects, including John C. Austin, Frederick M. Ashley, and Harvey H. Lochridge. He was elected to the American Institute of Architects (AIA) in 1920 and was the founding president of the Long Beach Architectural Club in 1923. His major Long Beach projects include City Hall, Press-Telegram Building, Times Building, YMCA, Wise Building, Billings Hotel, Buffum's Department Store, Long Beach Municipal Airport, Hancock Motors, Municipal Auditorium, Auditorium of Long Beach Poly High School, reconstruction of Wilson High School and Washington Junior High School, and Ambassador Apartments. In 1942, at the age of 61 W. Horace Austin passed away in Long Beach (PCR 2015).

### NAHC SLF Search

Chambers Group submitted a request for a search of the SLF records housed at the California NAHC on August 17, 2023. The results of the search were returned on October 3, 2023, and were **positive**. The NAHC response provided contact information for the nine tribes that may have information on cultural resources on the Project site and requested the District contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians for additional information related to the Proposed Project site.

The NAHC provided a list of 12 contacts, representing nine tribal governments, who may have knowledge of cultural resources near the Project Site (Attachment 2). The nine Native American tribal governments identified by the NAHC include the:

- Gabrieleño Band of Mission Indians - Kizh Nation
- Gabrielino - Tongva Indians of California Tribal Council
- Gabrieleno - Tongva San Gabriel Band of Mission Indians
- Gabrielino/ Tongva Nation
- Gabrielino - Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation Belardes
- Juaneño Band of Mission Indians Acjachemen Nation - 84A
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

Although the NAHC SLF results were **positive**, no NAHC scoping notification letters have been requested to be sent to the Native American contacts provided by the NAHC with the SLF results.

### AB 52 Consultation

AB 52 was enacted in 2015 (Chapter 532, Statutes of 2014), requiring an update to Appendix G (Initial Study Checklist) of the CEQA Guidelines to include questions related to impacts to tribal cultural resources (PRC § 21074), and establishing a formal consultation process for California tribes within the CEQA process (PRC § 21080.3.1, 21080.3.2). The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Public Resources Code § 21074 defines TCRs as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource. As a Lead Agency, LBUSD is required to conduct AB 52 consultation with requesting tribal groups on a government-to-government basis.

PRC § 21074 defines a resource as a TCR if it meets either of the following criteria:



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1. sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources; or
2. a resource that the lead agency determines, in its discretion, is a tribal cultural resource.

LBUSD is conducting AB 52 tribal consultation as necessary for the Project. If consultation is requested, this report can be supplemented with the results if requested by LBUSD.

### Paleontological Resources

On August 20, 2023, Chambers Group received the results of the paleontological records search from the NHMLA. The results show that no fossil localities lie directly within the Project site, however, there are fossil localities documented nearby from the same sedimentary deposit that underlays the Project site, either at the surface or at depth (Bell 2023). The records search covered only the records of the NHMLA. Based on the available information, the paleontological sensitivity could be considered low to moderate in the overall area considering the fossil localities recorded within the study area surrounding the Project site and the existence of similar fossil-bearing geologic units mapped underlying the Project site.

The geology of Long Beach has been mapped by Saucedo et al. (2016) at a scale of 1:100,000, showing old shallow marine deposits on wave-cut surface (Qom) underlying the Project site. Qom was deposited during the late to middle Pleistocene (126,000 years ago to 11,700 years ago) and Holocene (11,700 years ago to today) Epochs. Qom deposits are composed of poorly sorted, moderately permeable, reddish-brown, interfingered strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. These deposits rest on the now emergent wave cut abrasion platforms preserved by regional uplift. Locally may include older alluvium. Deposits from the Holocene Epoch (less than 11,700 years ago) can contain remains of animals and plants; however, only those from the middle to early Holocene (older than about 5,000 radiocarbon years) are considered scientifically important or significant (Society of Vertebrate Paleontology 2010). Holocene-age deposits may overlie older alluvium of Pleistocene age at unknown but potentially shallow depths. Pleistocene-age alluvium is also potentially present at the ground surface elevation. Pleistocene-age alluvial deposits have yielded scientifically important fossils elsewhere in the region, including mammoth, bison, and other large and small mammals, reptiles, and fish at the natural ground surface (Bell 2023).

### Survey Methodology

Chambers Group conducted a field Survey on November 22, 2023. The Survey was conducted by Cultural Resource Specialist Kellie Kandybowicz. The Survey was performed by conducting a visual inspection of the Proposed Project site as it pertains to the proposed Project design plan. This was achieved by walking the Project site, starting the survey in the northwestern asphalt-covered parking lot, parallel to Atlantic Avenue. The interior of the Project site was accessible through an entrance along East 17<sup>th</sup> Street. Where soil was present, the area was thoroughly inspected for visible signs of cultural resources. The landscaped areas along the western perimeter and in the interior of the school were inspected for evidence of historical resources. Also inspected was the grass- and dirt-covered ball field along the southern end of the Proposed Project Site. The Survey was completed as required, providing a full visual inspection of the existing built environment of the Proposed Project site, and inspection of the conditions present at time of the survey.

### Survey Results

The Survey resulted in no new cultural resources observed or recorded within the Proposed Project site. The visibility of the majority of the Project site was largely obscured and consists of built environment structures, maintained landscaped areas, asphalt- and concrete-paved parking lots, walkways, blacktop courts, and two sport recreation fields. The Project site was subject to visual inspection involving transects where viable in 10-meter intervals. Landscaped



areas along the western perimeter of the school, and the open areas in the interior of the surrounding buildings, were well-maintained and allowed for fair ground surface visibility (Photographs 1-5). In areas where visible, namely the exposed ground to the west of the ball field on the southern end, soils consisted of highly compacted medium brown sandy loamy clay (Photograph 6). Unobscured soil visibility was approximately 10 percent.

Given the historic age of the original Poly High development, there is potential that cultural resource surface deposits may be present underlying the existing development. Thus, it remains undetermined if cultural resources are present within the Proposed Project site at subsurface depths which may be disturbed by the Proposed Project.

## Conclusions and Recommendations

Although background research and Survey have been completed with no new resources identified, as noted above, the soil surface visibility was almost entirely impeded by the existing development. Based on the limited ground surface visibility, the historic nature of the Poly High structures, and the existence of previously recorded prehistoric and historic resources within the half-mile study area around the Proposed Project site, new resources still have the potential to be discovered in or near the Project site. Due to the demonstrated sensitivity of the area, we recommend the following mitigation measures be implemented.

**MM CUL-1** LBUSD shall retain the services of a qualified cultural resources consultant and require that all initial ground disturbing work be monitored by a cultural resources monitor. This includes all initial construction activities that will potentially expose or encounter intact subsurface sediments underlying the Project site. The cultural resources consultant shall provide a Qualified Archaeologist, meeting the Secretary of the Interior Standards (U.S. Department of the Interior, 2008), and require that all initial ground-disturbing work be monitored by cultural resources monitor (monitor) proficient in artifact and feature identification in monitoring contexts. The Consultant (Qualified Archaeologist and/or monitor) shall be present at the Project construction phase kickoff meeting.

**MM CUL-2** Prior to commencing construction activities and thus prior to any ground disturbance in the Proposed Project site, the Consultant shall conduct initial Worker Environmental Awareness Program (WEAP) training to all construction personnel, including supervisors, present at the outset of the Project construction work phase, for which the lead contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the monitor(s) to identify and minimize impacts to cultural resources and maintain environmental compliance and be performed periodically for new personnel coming on to the Project as needed.

**MM CUL-3** The contractor shall provide the Consultant with a schedule of initial potential ground disturbing activities. A minimum of 48-hours' notice will be provided to the archaeological consultant of commencement of any initial ground disturbing activities that have potential to expose or encounter intact subsurface sediments underlying the Project site. These activities may include grading, trenching, and mass excavation.

As detailed in the schedule provided, a monitor shall be present onsite at the commencement of ground-disturbing activities related to the Project. The Consultant shall observe initial ground disturbing activities and, as they proceed, adjust the monitoring approach as needed to provide adequate observation and oversight. All monitors will have stop-work authority to allow for recordation and evaluation of finds during construction. The monitor will maintain a daily record of observations as an ongoing reference resource and to provide a resource for final reporting upon completion of the Project.

The Consultant, the lead contractor, and subcontractors shall maintain a line of communication regarding schedule and activity such that the Consultant is aware of all ground disturbing activities in advance in order to provide appropriate oversight.



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**MM CUL-4** In addition to cultural resources monitoring, if formally requested during Native American Consultation under AB 52, a Native American monitor(s) selected by the tribe should be present at the Project kickoff meeting, be provided with a schedule of initial ground disturbing activities, and be onsite at the commencement of ground disturbing activities related to the Project, and as the Project proceeds adjusting personnel and schedule as needed to provide sufficient oversight. The Consultant, lead contractor, and all subcontractors shall routinely update the Native American monitor and their scheduling representative(s) regarding scheduling for ground disturbing activities, and changes to said schedule, such that there is sufficient advance notice that a Native American monitor can be scheduled accordingly.

**MM-CUL-5** If cultural resources are discovered, construction shall be halted within 50 feet of any cultural artifacts or features and within 100 feet of any potential human remains and shall not resume until the Qualified Archaeologist can determine the significance of the find and/or the find has been fully investigated, appropriately documented, and cleared.

**MM CUL-6** At the completion of all ground disturbing activities, the Consultant shall prepare a Cultural Resources Monitoring Report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric or historic archaeological finds, as well as providing follow-up reports of any finds to the SCCIC, as required.

**HUMAN REMAINS – LEGAL REQUIREMENTS**

In the event that human remains are discovered during ground-disturbing activities, then the Proposed Project would be subject to California Health and Safety Code 7050.5, CEQA Section 15064.5, and California Public Resources Code Section 5097.98 (NPS 1983). If human remains are found during ground disturbing activities, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Medical Examiner-Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the Los Angeles County Medical Examiner-Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the Medical Examiner-Coroner shall notify the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials (NPS 1983).

Sincerely,

**CHAMBERS GROUP, INC.**

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*Principal Investigator*  
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**Attachments**

- Attachment 1:** Project Survey Photographs
- Attachment 2:** NAHC SLF Records Search Results Letter
- Attachment 3:** CONFIDENTIAL Record Search Results Figure



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**ATTACHMENT 1: CULTURAL RESOURCES SURVEY PHOTOGRAPHS**





Photograph 1: Location of ball field on southern end of Polytechnic High School. View to north/northwest.



Photograph 2: Overview of Project site interior ground surface visibility and general landscaping. View to the northwest.



Photograph 3: Overview of Project site interior ground surface visibility and general landscaping. View to the northeast.



Photograph 4: Overview of Project site interior ground surface visibility and general landscaping. View to the north/northeast.



Photograph 5: Overview of Project site interior ground surface visibility and general landscaping. View to the east/northeast.



Photograph 6: Overview of exposed soils to the west of ball field along southern perimeter. View to the east.

**ATTACHMENT 2: NAHC SLF RECORDS SEARCH RESULTS LETTER**







## NATIVE AMERICAN HERITAGE COMMISSION

October 3, 2023

Kellie Kandybowicz  
Chambers Group, Inc.Via Email to: [kkandybowicz@chambersgroupinc.com](mailto:kkandybowicz@chambersgroupinc.com)

Re: LBUUSD Polytechnic High School Transformation Project, Los Angeles County

Dear Ms. Kandybowicz:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

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

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: [Andrew.Green@nahc.ca.gov](mailto: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  
**Laurena Bolden**  
SerranoCOMMISSIONER  
**Reid Milanovich**  
CahuillaCOMMISSIONER  
**Vacant**EXECUTIVE SECRETARY  
**Raymond C.  
Hitchcock**  
Miwok, NisenanNAHC HEADQUARTERS  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

**Native American Heritage Commission  
Native American Contact List  
Los Angeles County  
10/3/2023**

<b>Tribe Name</b>	<b>Contact Person</b>	<b>Contact Address</b>	<b>Phone #</b>	<b>Email Address</b>	<b>Cultural</b>	<b>Last</b>
Gabrieleno Band of Mission Indians - Kizh Nation	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	8/18/2023
Gabrieleno Band of Mission Indians - Kizh Nation	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	8/18/2023
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	GTTribalcouncil@aol.com	Gabrieleno	
Gabrielino /Tongva Nation	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479	sgoad@gabrielino-tongva.com	Gabrielino	3/28/2023
Gabrielino Tongva Indians of California Tribal Council	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761	christina.marsden@alumni.usc.edu	Gabrielino	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	gtongva@gmail.com	Gabrielino	3/16/2023
Gabrielino-Tongva Tribe	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351	tongvatcr@gmail.com	Gabrielino	5/30/2023
Gabrielino-Tongva Tribe	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048	Chavez1956metro@gmail.com	Gabrielino	5/30/2023
Juaneno Band of Mission Indians Acjachemen Nation - Belardes	Joyce Perry, Cultural Resource Director	4955 Paseo Segovia Irvine, CA, 92603	(949) 293-8522	kaamalam@gmail.com	Juaneno	3/17/2023
Juaneno Band of Mission Indians Acjachemen Nation 84A	Heidi Lucero, Chairperson, THPO	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(562) 879-2884	jbman.chairwoman@gmail.com	Juaneno	3/28/2023
Santa Rosa Band of Cahuilla Indians	Lovina Redner, Tribal Chair	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	lsaul@santarosa-nsn.gov	Cahuilla	
Soboba Band of Luiseno Indians	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	7/14/2023
Soboba Band of Luiseno Indians	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	7/14/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed LBUSD Polytechnic High

**ATTACHMENT 3: CONFIDENTIAL RECORDS SEARCH RESULTS FIGURE**

