

## 3.4 Cultural Resources

This section identifies known cultural resources, including archaeological, tribal cultural resources, and historical, present within the Project Area, evaluates the potential project-related impacts on those resources; and provides mitigation measures, as applicable. The identification of impacts to cultural resources was conducted under the provisions of Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines. The environmental setting and analysis in this section rely on information from the Project's Historical Resources Evaluation Report (GPA Consulting, 2019) and the Archaeological Assessment (Applied EarthWorks, 2019).

As noted in the analysis below, direct and indirect impacts associated with cultural resources during construction and operation would be less than significant and no mitigation measures are required.

### 3.4.1 Regulatory Setting

Cultural resources fall within the jurisdiction of several levels of government. Federal, state, and local jurisdictions provide the framework for the identification, documentation, and protection of such resources. As described below, the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA), and City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code Section 22.171) are the primary laws applicable to the proposed Project that govern and affect the preservation of cultural resources of national, state, and local levels of government.

#### 3.4.1.1 Federal

##### ***National Historic Preservation Act***

The NHPA of 1966, as amended, sets forth national policy and procedures for historic properties, defined as districts, sites, buildings, structures, and objects included in or eligible for listing in the National Register of Historic Places (National Register). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and to allow the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on those undertakings, following regulations issued by the ACHP (36 CFR Part 800).

##### National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment (Title 36 Code of Federal Regulations Part 60.2)." The National Register recognizes properties that are significant at the national, state, and/or local levels.

##### *Criteria*

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria (Title 36 Code of Federal Regulations Part 60.4):

- A. Associated with events that have made a significant contribution to the broad patterns of our history;
- B. Associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent 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; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

### *Context*

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear” (National Park Service, 1990). A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

### *Integrity*

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance” (National Park Service, 1990). Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

## **3.4.1.2 State**

### ***California Environmental Quality Act***

CEQA requires the consideration of historical resources and tribal cultural resources, as well as “unique” archaeological resources. For the purposes of CEQA, a historical resource is a cultural resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR) (Public Resources Code [PRC] Section 21084.1). Properties listed in, or formally determined eligible for listing in, the NRHP are automatically listed in the CRHR (14 California Code of Regulations Section 4851 [a][1]). Therefore, cultural resources that are “historic properties” under the NHPA are also “historical resources” under CEQA. In addition, cultural resources included in a local register of historical resources or identified as significant in a qualified historical resource survey are also presumed to be historical resources for CEQA.

In 2014, Assembly Bill 52 (AB 52) added the term “tribal cultural resources” to CEQA, and AB 52 is commonly referenced instead of CEQA when discussing the process to identify tribal cultural resources (as well as identifying measures to avoid, preserve, or mitigate effects to them). Defined in PRC Section 21074(a), a tribal cultural resource is a CRHR or local register eligible site, feature, place, cultural landscape, or object which has a cultural value to a California Native American tribe. Tribal

cultural resources must also meet the definition of a historical resource. Unique archaeological resources are referenced in PRC Section 21083.2.

### California Register of Historical Resources

The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts (PRC Section 5024.1[a]).

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register (PRC Section 5024.1[d]).

### *Criteria and Integrity*

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance (PRC Section 4852).

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria (PRC Section 5024.1):

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;
3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

### ***State Health and Safety Code, Section 7050.5/California Public Resources Code, Section 5097.9***

State Health and Safety Code (HSC) Section 7050.5 and PRC Section 5097.9 contain provisions for the treatment of human remains contained in archaeological sites. Under HSC Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, HSC Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of the discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours.

NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased person so they can inspect the burial site and make recommendations for treatment or disposal.

### ***3.4.1.3 Local***

#### ***City of Los Angeles Cultural Heritage Ordinance***

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The four criteria for HCM designation are stated below:

1. The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community; or
2. The proposed HCM is identified with historic personages or with important events in the main currents of national, state, or local history; or
3. The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style, or method of construction; or

4. The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age (Los Angeles Administrative Code Section 22.171.7).

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

### ***City of Los Angeles Conservation Element***

The Conservation Element of the City of Los Angeles General Plan (adopted September 2001) primarily addresses preservation, conservation, protection, and enhancement of the city's natural resources. The Conservation Element specifically addresses archaeological resources in Section 3 of Chapter 2. Cultural and historical resources are addressed in Section 5 of the same chapter.

With regard to archaeological resources, the Conservation Element contains the following objective with an associated policy and program:

- **Objective:** protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.
- **Policy:** continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities.
- **Program:** permit processing, monitoring, enforcement, and periodic revision of regulations and procedures.
- **Responsibility:** departments of Building and Safety, City Planning and Cultural Affairs, and/or the lead agency responsible for project implementation.

The Conservation element also includes the following objective, policy, and programs for cultural and historic resources:

- **Objective:** protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.
- **Policy:** continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.
- **Program 1:** development permit processing, monitoring, enforcement and periodic revision of regulations and procedures.
- **Responsibility:** departments of Building and Safety, City Planning, Cultural Affairs and Community Redevelopment Agency and/or the lead agency responsible for project implementation.
- **Program 2:** prepare the Historic Preservation and Cultural Resources Element of the general plan.
- **Responsibility:** departments of City Planning and Cultural Affairs.
- **Program 3:** continue to survey buildings and structures of any age in neighborhoods throughout the city in order to develop a record that can be used in the present and future for evaluating their

historic and cultural value as individual structures and within the context of surrounding structures.

- **Responsibility:** departments of Building and Safety, City Planning, and Cultural Affairs and the Community Redevelopment Agency.

### 3.4.2 Environmental Setting

The Project Area is a fully developed, mixed-use urban setting, bisected by the channelized Los Angeles River (see **Figure 2-2**, Project Area). Land uses along the east and west sides of the River are predominantly industrial and commercial. The built environment in the vicinity of the Project Area is characterized by the width of the streets and their grid-like arrangement; railroad rights-of-way and the placement of spur tracks to the rear of parcels; the size of parcels and the corresponding footprint and height of the buildings erected; extensive surface parking areas, often designed to accommodate large trucks; evidence of former rail lines (such as remnant tracks and a rail stop); remnant granite infrastructure (including curbs, swales, and rail beds); and the lack of street trees or other landscaping. The area is characterized by industrial building types that vary widely in size, from modest industrial buildings to massive warehouses spanning full city blocks. Buildings in the area were constructed primarily between 1900 and 1940 and are predominantly vernacular or utilitarian in form and style.

Railroad corridors exist along the east and west banks of the LA River. The Los Angeles River is contained within a trapezoidal concrete-lined channel. There are two extant bridges within the Project Area: the Fourth Street Viaduct (Bridge No. 53C0044) and the Seventh Street Viaduct (Bridge No. 53C1321). The Fourth Street Viaduct is a concrete arch bridge over the Los Angeles River, located along Fourth Street. The Seventh Street Viaduct is a reinforced concrete arch bridge is located along Seventh Street over the Los Angeles River. The Sixth Street Viaduct Replacement is currently under construction within the Project Area.

#### 3.4.2.1 Geological Setting

The Project Area is generally situated within a broad valley of the Los Angeles Basin. This broad, level expanse of land comprises more than 800 square miles extending from Cahuenga Peak southward to the Pacific Coast, and from the Topanga Canyon southeast to the vicinity of Aliso Creek. The Los Angeles Basin is traversed by several large watercourses. The Project Area is surrounded by the Santa Monica Mountains to the northwest and north; the San Gabriel Mountains to the north and northeast; and the Baldwin Hills to the south. The soils are alluvium and colluvium underlain by Miocene marine sedimentary deposits. Geological faulting and folding of the crust in the area have trapped oil deposits beneath the surface (Mayuga, M.N., 1970). The geologic formation underlying the Project Area is tentatively identified as sand, silt, and gravel as well as alluvial fans and streambeds.

#### 3.4.2.2 Prehistoric Background

The sediments and soils within the Project Area date from periods ranging from Holocene to Late Pleistocene. Within the Project Area, most deposits are derived from the Los Angeles River and are unlikely to preserve fossil material because of their recent nature. Remnants of Valley Grassland and Coastal Sage-Scrub zones cover much of the Los Angeles Basin and adjacent hill slopes. Few

stands of native biotic communities remain today within the Los Angeles Basin, with present-day plant communities primarily being landscaped and introduced species.

### **3.4.2.3 Ethnographic Background**

The Project Area lies within the territory of the Gabrieleño Native American people. It is believed that the total Gabrieleño territory covered more than 1,500 square miles and included the watersheds of the Los Angeles River, San Gabriel River, Santa Ana River, and Rio Hondo. The Gabrieleño also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations that ranged from approximately 50 to 150 individuals.

A typical Gabrieleño settlement contained a variety of structures used for religious, residential, and recreational purposes. This wealth of natural resources, coupled with effective technology and a well-developed trade and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California (McCawley, 1996). Trade was an important element of the Gabrieleño economy. In general, the Gabrieleño cultivated alliances with other groups, including a Chumash-Salinan- Gabrieleño alliance (Bean, 1976), and also maintained cult or ritual centers (such as the village Povongna, presumed to be located in the vicinity of Long Beach). Mission San Gabriel was founded on September 8, 1771, at a location near the Whittier Narrows. After this, the traditional Gabrieleño communities were depopulated and epidemics caused by the introduction of European diseases greatly reduced the population.

The ethnographic evidence suggests that several Gabrieleño settlements were located on the Los Angeles plain. Archaeologist Chester King identified several areas where archaeological remains of village sites dating to the ethnohistoric contact period may be located (Applied EarthWorks, 2019). Two of these vaguely defined areas include Ha'utnga in the Lynwood/South Gate/Watts area and Amupunga near the Rancho San Pedro (Dominguez) Adobe. A third village area known as Yaanga (or Yaangna), is believed to have been located on the west bank of the Los Angeles River slightly south of the old Spanish Plaza of Pueblo de Los Angeles in the vicinity of Union Station, north of the Project Area.

### **3.4.2.4 Historic Background**

The Project Area was first utilized as agricultural land by inhabitants of the Pueblo that later became Los Angeles. The area on the east side of the Los Angeles River was used for cattle ranching until the 1830s. The west side of the River was a vineyard in the 1830s. The 1849 Gold Rush brought a large demand for citrus fruit, which was used to protect against scurvy, a common malady of miners. Oranges and grapefruit quickly overtook grapes as the area's primary crops. The fruit industry proved to be the saving grace of the regional economy when a drought in 1862 decimated the cattle industry. In 1858, Andrew Aloysius Boyle purchased a large section of the east side of the River and planted a vineyard. Despite its proximity to the center of Los Angeles, Boyle's land remained pastoral and was generally perceived as unfit for development at the time, due to its geographic isolation from the rest of the city because of the Los Angeles River. The agrarian character of the areas around the River was redefined with the arrival of the railroads in the late nineteenth century.

The development of Los Angeles was heavily dependent on evolving transportation systems for the delivery of raw materials and the moving of finished goods. Until the 1870s, only local rail lines ran through Los Angeles. The Los Angeles and San Pedro Railroad (LA & SP) was incorporated in 1868. The

LA & SP built a local line connecting the port of Wilmington with the inland City of Los Angeles. LA & SP was consolidated with the Southern Pacific in 1874 as part of the arrangement to bring the transcontinental Southern Pacific to Los Angeles. In 1876, Southern Pacific opened the line connecting Los Angeles to San Francisco, linking Los Angeles with the transcontinental railroad. The completion of a transcontinental rail line to Southern California in 1885 and a subsequent fare “war” between the Southern Pacific and Santa Fe railroads brought scores of newcomers to Los Angeles, which in turn produced a surge of land speculation and development activity across the region.

As the railroads increased mobility, Los Angeles ceased to be simply a market for manufactured goods produced in San Francisco and the East and began to support local industries as well. Similarly, as agricultural activities in other areas of the city supplanted those near the city center, the city center evolved from simply a shipping hub to a processing and manufacturing center. This was particularly true of the areas adjacent to the Los Angeles River where transcontinental railroads laid their tracks (Southern Pacific Railroad on the west side of the Los Angeles River and later the Atchison, Topeka & Santa Fe Railway on the east side). Streetcars crossed through the area, facilitating the movement of workers and encouraging development along the spine of the River. By 1901, seven streetcar lines traversed the River, linking downtown Los Angeles on the west with Boyle Heights on the east. These areas evolved into the City’s first industrial district.

Industrial development was diverse and included freight houses and freight yards developed by the railroads in addition to warehouses, manufacturing facilities, and salvage yards. Construction-related industries expanded rapidly beginning in the 1880s when the regional real estate boom spurred residential and commercial construction. Industrial development in the area did not begin in earnest until the subdivision of two substantial tracts specifically dedicated for industrial use: the Industrial Tract, recorded in 1903 by the Industrial Realty Company; and the Industrial Center Tract, recorded in 1904. These tracts defined the southwestern section of the Project Area, terminating at Seventh Street. In the early decades of the twentieth century, many of the area’s industrial buildings were one of two types: manufacturing or processing facilities and warehouses. A 1909 map of the area notes the considerable number of warehouses and storage facilities which had been constructed in just a few years, as well as a wide variety of processing and manufacturing operations – including lumber yards, freight yards, ice, and cold storage, slaughterhouses, meatpackers, produce companies and canneries, and blacksmiths, among others (Historic Resources Group, 2016). Many of the area’s industrial buildings were constructed directly on a rail spur; these buildings often display curved facades that follow the tracks, with docks and large bay doors set several feet above the ground (to the height of a boxcar), to facilitate the loading and unloading of goods. Warehouses were built either as general storage facilities – with space that could be rented by a variety of companies or operators – or were purpose-built facilities associated with a particular company.

As new local industries established themselves, processing and manufacturing operations in the area continued to expand. Two industries flourished during this period: ice and cold storage, and food processing and packaging. Cold storage emerged in response to the demand for fresh products in urban areas and provided a critical link between agricultural goods from farms, fisheries, and ranches and their distribution to fresh produce markets and food processors. Construction of cold storage warehouses was initially linked with that of ice-making plants, with both frequently located within the same facility. Food processing industries represented some of the earliest industrial development in Los Angeles, but the

industry exploded in operation during the 1910s and 1920s as companies began to embrace mechanization to meet the demands of new chain stores. Food processing eventually became one of the dominant industries in the area.

The character of the industrial areas adjacent to the River remains largely a function of the redevelopment of Union Pacific's former railroad facilities during the 1920s. In response to the strong demand for industrial space arising from the economic growth of the Los Angeles region in the 1910s, Union Pacific, on the east side of the River, began removing many of its facilities near the Los Angeles River and dividing its properties into industrial sites. A major incentive attracting business to this industrial district was the Union Pacific spur tracks interlaced among the streets, providing industries with easy access to a national freight rail network. This ushered in a wave of industrial development on the east side of the River.

By the 1920s, the east and west sides of the River were fully established as an industrial hub. This was aided in part by the pattern of development occurring outside the central city. As the City of Los Angeles continued to annex existing communities as well as available land in the San Fernando Valley, zoning was amended to eliminate residential development and accommodate the construction of more offices, retail, and manufacturing facilities in the downtown area. Boyle Heights, just east of the Union Pacific industrial zone along the River, had become a densely populated residential suburb.

The east side of the Los Angeles River and Boyle Heights benefited tremendously from the Viaduct Bond Act of 1923, which set into motion an ambitious and far-reaching bridge building program across the city. The sale of bonds financed the construction of a series of monumental concrete viaducts that spanned both the Los Angeles River and the rail lines that ran adjacent to the riverbed; seven of these viaducts, at Macy (now Cesar Chavez), First, Fourth, Whittier/Sixth, Seventh, Ninth (now Olympic), and Washington Streets, were routed into Boyle Heights and were completed between 1925 and 1933. The Whittier/Sixth Street Bridge built in 1933 (now demolished) was the last bridge built as part of the bond measures. These bridges replaced several existing wood and metal truss bridges, which were susceptible to flood damage and lacked the capacity to accommodate traffic that had been generated by the area's rapid growth.

Industrial development in the area declined following World War II. After the Interstate Highway System was launched in the 1950s, the trucking industry became the preferred mode of transportation for industrial activity and the railroads declined. Locating factories and warehouses in districts with spur track access became less important. At the same time, many pre-war industrial districts had become highly congested urban areas that were less convenient for truck access, unlike newly-built factories and warehouses on the outskirts of cities and in suburbs. The construction of an expansive freeway network throughout Southern California also drastically altered the configuration and physical character of the Project Area. Five freeways and the multi-level East Los Angeles Interchange were routed through Boyle Heights between 1948 and 1965.

While industries evolved over time, the area maintained its character as an industrial center, with one processing or manufacturing operation replacing another. Over the course of the twentieth century, a single manufacturing facility might house the production of everything from dog food to pie. In the 1950s, the area was home to automotive manufacturing, trucking and transport, furniture manufacturing and storage, paint and chemical manufacturing, and paper and plastic production – as well as historically dominant industries such as food processing and lumber and woodworking operations.

By the 1960s, however, the character of the area was evolving away from that of an industrial center. Local industries and manufacturers struggled to adapt to the competition brought on by containerization and other modern technologies. Outlying fledgling industrial centers such as Vernon and the City of Commerce were comparatively undeveloped and offered plentiful land at lower prices, presenting many companies with an opportunity to relocate and construct newer and more efficient facilities. As a result, many buildings in the industrial district were vacant by the 1970s.

The use of the area's industrial buildings evolved as artists and other creative types began to congregate amidst the vacant buildings and empty lots. Priced out of established artists' colonies in neighborhoods such as Venice and Hollywood, Los Angeles' industrial district provided many with an opportunity to live and work inexpensively in vast warehouse buildings. Many of the area's most prominent industrial buildings found new life as gallery space and underground hangouts for a burgeoning art and music scene. By the 1980s, the area was home to several avant-garde art galleries, giving rise to the group of early artists now called the "Young Turks" (Miller, 2014). In 1981, the City of Los Angeles implemented the Artist-in-Residence Program, which legalized the residential use of formerly industrial buildings for artists, legitimizing their efforts. In the mid-1990s, the area was officially designated as the Arts District by the City. A subsequent wave of development began in 1999 with the passage of the Adaptive Reuse Ordinance, which relaxed zoning codes and allowed for the conversion of pre-1974 commercial and industrial buildings into residences for artists and non-artists alike. The area continues to attract new commercial and residential development, as existing facilities are adapted to meet the needs of the growing community.

### **3.4.3 Identification and Evaluation of Cultural Resources**

#### **3.4.3.1 Methodology**

##### ***Archaeological Resources***

Record searches for previous documentation of identified archaeological resources were conducted. A reconnaissance-level archaeological survey of the Project Area was conducted on January 11, 2018. The purpose of the survey was to assess the current conditions of the Project Site (i.e., the footprint of the proposed Project) to examine any exposed native sediments that may be present. In addition, an attempt was made to re-identify the two archaeological sites that had been previously recorded in the Project Site west of the River. At the time of the survey, much of the proposed Project Site was under construction for the Sixth Street Viaduct Seismic Improvement Project. Due to safety concerns and access issues, only the Project Site, and not the area encompassing the Los Angeles River and railroad rights-of-way, was examined by the archaeologist during the reconnaissance survey.

##### ***Tribal Cultural Resources***

On November 3, 2017, NAHC recommended that local Native American tribes be contacted for information on Native American resources within the Project Area. Applied EarthWorks sent a letter via electronic mail on January 18, 2018, to these groups. A second attempt at correspondence was made on February 7, 2018. Only one response was received, from the Gabrieleño Indians of California Tribal Council. The City is currently consulting with the Gabrieleño Indians of California Tribal Council in accordance with AB 52.

## ***Historical Resources***

The study area was defined as roughly a two-parcel radius to the north and south of East Sixth Street and Whittier Boulevard from Interstate 5 on the east to Mill Street on the west. The Project Area also included a segment of the Los Angeles River, adjacent railroad rights-of-way, and two bridges located at East Fourth Street to the north and East Seventh Street to the south. In order to identify and evaluate historical resources, a multi-step methodology was utilized. Record searches for previous documentation of identified historic resources were conducted, including listings in the NRHP, determinations of eligibility for NRHP listings, and the City of Los Angeles' historic resource inventories. Prior historical resource surveys involving the Project Area were also reviewed, including the 6th Street Viaduct Seismic Improvement Project Historical Resources Evaluation Report (Parsons, 2007), Adelante Eastside Redevelopment Project Intensive Historic Resources Survey (PCR Services Corporation, 2008), and SurveyLA (Historic Resources Group, 2016). An intensive survey, including photography and background research, was then made of the study area.

### ***3.4.3.2 Survey Results***

#### ***Archaeological Resources***

Within the Project Area, many of the buildings and structures that were previously located along Whittier Boulevard and Sixth Street have been demolished by the Sixth Street Viaduct Seismic Improvement Project. In the portion of the Project Area east of the Los Angeles River, a series of bridge support columns have been constructed along Whittier Boulevard running in a southeast-to-northwest direction. At the time of the site visit (January 11, 2018), bridge support columns had not yet been installed west of the River, but portions of the west abutment immediately west of Mateo Street were under construction. An inspection of exposed sediments revealed a high level of ground disturbance throughout the Project Area. Examination of the Los Angeles River and adjacent railyards from the public right-of-way indicates that the entire APE is developed with few to no areas of exposed ground.

An archaeological monitor from Duke CRM was on-site at the time of the site visit to observe ground-disturbing activities associated with the Sixth Street Viaduct Seismic Improvement Project. Archaeological monitoring for the Sixth Street Viaduct Seismic Improvement Project had been ongoing since at least August 2017. The archaeological monitor noted that in the portion of the Project Area west of the Los Angeles River, existing ground disturbance extended approximately five or six feet in depth. Although no prehistoric artifacts had been encountered during the monitoring activities, the archaeological monitor stated that various historical ceramic and glass fragments have been recovered throughout the area. She noted that several small stone spheres, which likely date to the historic period, were recovered near the Sixth Street and Mateo Street intersection.

The recorded locations of 19-004192 and 19-004193 were revisited during the reconnaissance survey. An examination of the ground surface in these areas revealed the area had been extensively disturbed and recently graded. Site 19-004192 consists of a historic-period refuse scatter. The site measures 50 by 25 feet in area and is located west of the Los Angeles River and east of Santa Fe Street under the Sixth Street Bridge. The scatter consists of 13 pieces of brick and 2 glass bottle fragments. The site was initially recorded within a proposed maintenance and storage facility for the Westside Subway Extension Project; the resource was previously determined ineligible for listing on either the NRHP or the CRHR (Sikes,

2012). Site 19-004193 consists of an early twentieth-century road remnant. The site measures 3.5 by 2.5 feet in area and is located near the foundation of the Sixth Street Bridge. No artifacts were found in association with the exposed road surface. The site is located within a proposed maintenance and storage facility for the Westside Subway Extension Project; the resource was previously determined ineligible for listing on either the NRHP or the CRHR (Sikes, 2012). No surface evidence was found for the previously documented historical refuse deposit (19-004192) or historical road (19-004193) (Applied EarthWorks, 2019).

### ***Tribal Cultural Resources***

NAHC indicated in a letter sent to Applied EarthWorks on November 3, 2017, that Native American resources were recorded in the Project Area. The NAHC recommended that local Native American groups be contacted to elicit specific information on Native American resources. Applied Earthworks sent a letter via electronic mail to these individuals on January 18, 2018.

Individuals/organizations contacted at the request of the NAHC are listed below:

- Charles Alvarez, Gabrieleño Tribe
- Robert Dorame, Chairperson of the Gabrieleño Indians of California Tribal Council
- Sandonne Goad, Chairperson of the Gabrieleño Nation
- Anthony Morales, Chairperson of the Gabrieleño San Gabriel Band of Mission Indians
- Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians-Kitz Nation

One response was received. Robert Dorame, Chairperson of the Gabrieleño Indians of California Tribal Council, stated that historic-period archaeological materials, as well as abalone shell, had been recovered outside of the Project Area but just north of the Project Area, along the west bank of the Los Angeles River. He also noted that the Los Angeles River's course had fluctuated through time and at one point it had covered much of the Project Area. Because of the proximity of the Project Area to both known archaeological remains and the Los Angeles River, Mr. Dorame stated that the Project Area is sensitive for prehistoric Native American remains. He requested that a Native American monitor affiliated with the Gabrieleño Indians of California Tribal Council observe all ground-disturbing activities (including bore holes and asphalt removal) associated with the proposed Project.

### ***Historical Resources***

Within the Project Area, there are no NRHP-listed properties. After research and field survey, it was determined that there are four historical resources as defined by CEQA in the Project Area:

- The Fourth Street Viaduct (LAHCM #904 and Bridge No. 53C0044) is a designated Los Angeles Historic-Cultural Monument and determined eligible for listing in the National and California Registers (Status Code 2S2).
- The Seventh Street Viaduct (LAHCM #906 and Bridge No. 53C1321) is a designated Los Angeles Historic-Cultural Monument and determined eligible for listing in the National and California Registers (Status Code 2S2).

- For the purposes of CEQA review, the segment of the Los Angeles River Channel within the Project Area is presumed to be a historical resource. Segments of the Los Angeles River outside of the Project Area were previously identified as eligible for listing under NRHP Criterion A and CRHR Criterion 1 as a contributing element of the larger, 51-mile linear resource (GPA Consulting, 2019). The river is presumed eligible for its association with flood control in the region and for facilitating the continued development of river-adjacent areas during and after World War II.
- The Downtown Los Angeles Industrial Historic District is a historic district identified as eligible for federal, state, and local historic designation through SurveyLA, a citywide historical resource survey conducted by the City of Los Angeles. The district is significant for its role in the industrial development of Los Angeles; this area served as the city's primary industrial district from the late-nineteenth century through World War II. It was identified as eligible for listing under NRHP Criterion A and CRHR and LAHCM Criterion 1. Five buildings within the Project Area were evaluated as non-contributors to the Downtown Los Angeles Industrial Historic District by SurveyLA. As non-contributors, these buildings do not add to the historic architectural qualities, historic association, or historic patterns for which the District is significant. In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, these five buildings are not considered historical resources for the purposes of CEQA compliance; however, the District as a whole is considered a historical resource.

GPA Consulting re-surveyed the Project Area and did not identify any potential historical resources that were not already identified by SurveyLA (Historic Resources Group, 2016) and other recent historical resource surveys of the 6th Street Viaduct Seismic Improvement Project Area (Parsons, 2007) and Adelante Eastside Redevelopment Project Area (PCR Services Corporation, 2008). It is unlikely that further research would reveal previously unidentified historic associations and the properties in the Study Area were unlikely to meet the criteria for significance. Due to alterations, most of the properties were too altered to retain integrity to convey significance.

### 3.4.4 Environmental Impact Analysis

This section outlines the methodology, evaluation, and impacts for archaeological, tribal cultural, and historical resources. It is intended to assist in the evaluation and conclusions of the impact analysis provided below and in the formation of required mitigation measures.

#### 3.4.4.1 Screening Analysis

Several impacts and corresponding thresholds of significance in the following section were eliminated from further analysis in this EIR. Topics were eliminated if the Initial Study for the proposed Project concluded there would be "No Impact," or if impacts were identified to be "Less Than Significant..." and will not be discussed further in the EIR." Therefore, only the topics described in the section below were determined to require further analysis in this EIR. A copy of the Initial Study, which contains the eliminated topics, is provided in **Appendix A**.

#### 3.4.4.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and the *L.A. CEQA Thresholds Guide*, the proposed Project would have a significant impact on Cultural Resources if it would:

**V(a)** Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

**D.3 Historical Resources.** A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource that does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

**V(b)** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5

**V(c)** Disturb any human remains, including those interred outside of formal cemeteries?

According to Appendix G of the CEQA Guidelines, a project would have a significant impact related to tribal cultural resources if it would:

**XVIII** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

**(a)** Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

**(b)** 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 Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

### **3.4.4.3 Construction Impacts**

The analysis below describes the potential temporary and permanent impacts on cultural resources for the proposed Project during construction.

**V(a): Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

The proposed Project includes the construction of public recreational space on approximately 13 acres in areas underneath and adjacent to the Sixth Street Viaduct Replacement. The proposed Project is organized into three areas, referred to as the West Park, Arts Plaza and River Gateway, and the East Park. The River Gateway would involve permanent alterations to an existing pedestrian and maintenance tunnel (LA River Access Tunnel) that connects the Arts Plaza site with the west bank of the Los Angeles River. In addition, reinforced concrete planted terraces would be constructed on the west and east banks of the LA River channel. Four historical resources were

identified within the Project Area: Fourth Street Viaduct, Seventh Street Viaduct, the Los Angeles River, and the Downtown Los Angeles Industrial Historic District.

The Fourth Street Viaduct and Seventh Street Viaduct (the viaducts) are significant for their method of construction and innovative design. None of the activities associated with the construction phase of the proposed Project would physically impact the viaducts. The construction phase of the proposed Project would not result in a substantial adverse change in the significance of the viaducts.

The Los Angeles River is significant for its association with flood control in the region, for facilitating the continued development of river-adjacent areas during and after World War II, and for its method of construction. The construction phase of the proposed Project includes alterations to LA River Access Tunnel, which include widening the tunnel opening; resurfacing the entryway, pavement, and tunnel floor; painting; installing lighting; and installing safety features, including removable bollards or gate and warning devices. In addition, reinforced concrete planted terraces would be constructed on up to approximately 20,000 square feet of the west and east banks of the LA River channel. The proposed improvements would be compatible with the size, scale and proportion, and massing of the existing concrete channel. The historical resource would not be materially impaired; therefore, the activities associated with the construction phase of the proposed Project would not result in a substantial adverse change in the significance of the River.

The Downtown Los Angeles Industrial Historic District (District) is significant for its role as the City's primary industrial district from the late nineteenth century through World War II. The proposed Project Site is located outside the District boundaries. None of the activities associated with the construction phase of the proposed Project would physically or indirectly impact the District's contributing buildings or its other distinctive features. The construction phase of the proposed Project would not result in a substantial adverse change in the significance of the District.

The historic associations, design elements, and character defining features that convey the significance of the four historical resources in the Project Area would not be affected by the activities associated with the construction phase of the proposed Project. Therefore, impacts during construction would be less than significant and no mitigation measures are required.

**V(b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

Results of the archaeological assessment indicate there are no significant archaeological resources that would be affected by the proposed Project. However, the archaeological sensitivity model created for the proposed Project indicates that undisturbed native sediments throughout much of the Project Site have a moderate potential for buried archaeological deposits dating to the prehistoric period. Within the Los Angeles River and railroad rights-of-way, the potential of encountering prehistoric and historic archaeological remains is considered relatively low.

The development of the West Park and East Park portions of the Project Site has the potential to disturb deeply buried and intact prehistoric and historic archaeological resources. Archaeological monitoring would be conducted in the West Park and East Park for excavations at depths greater than five feet (see **BMP-CUL-1**). In the unlikely event that previously undisturbed archaeological resources are encountered during construction, all work in the vicinity would stop until a qualified

archaeologist can visit the site of discovery and assess the significance of the archaeological resource (see **BMP-CUL-4**). Therefore, the project would not cause a substantial adverse change in the significance of an archaeological resource.

**V(c): Would the project disturb any human remains, including those interred outside of formal cemeteries?**

No human remains are known to exist in the Project Site, and the location does not encompass any formal cemeteries. However, the Gabrieleño Indians of California Tribal Council have indicated that the Project Area is sensitive for prehistoric Native American remains. Health and Safety Code Section 7050.5, Section 15064.5(e) of the CEQA Guidelines, and PRC Section 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery (see **BMP-CUL-5**). Specifically, the Los Angeles County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner must then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she must contact the NAHC by phone within 24 hours. The NAHC then designates a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD will then have the opportunity to recommend to the Project proponent means for treating or disposing of, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification.

**XVIII: Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California Register of Historical Resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?**

The Gabrieleño Indians of California Tribal Council has indicated that the Project Area is sensitive for prehistoric Native American remains. Chairperson Dorame requested that a Native American monitor affiliated with the Gabrieleño Indians of California Tribal Council observe all ground-disturbing activities (including bore holes and asphalt removal) associated with the proposed Project. It is anticipated that a qualified tribal cultural resource monitor may be present during excavation activities in the proposed Arts Plaza (see **BMP-CUL-3**). In addition, a tribal cultural resources sensitivity training session would be held for the construction contractor prior to construction activities (see **BMP-CUL-2**). The City will continue working with the tribe in accordance with the requirements of AB 52. Because no tribal cultural resources were observed in the Project Area, impacts would be less than significant and no mitigation measures are required.

#### **3.4.4.4 Operational Impacts**

The analysis below describes the temporary and permanent impacts on cultural resources anticipated as a result of the proposed Project during operation. The analysis below evaluates potential impacts, based upon the applicable threshold of significance.

**V(a): Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

Operation of the proposed Project would involve the use and maintenance of public recreational space on approximately 13 acres in areas underneath and adjacent to the Sixth Street Viaduct. As described above, four historical resources were identified within the Project Area: Fourth Street Viaduct, Seventh Street Viaduct, the Los Angeles River, and the Downtown Los Angeles Industrial Historic District.

The Fourth Street Viaduct and Seventh Street Viaduct (the viaducts) are significant for their method of construction and innovative design. Operation of the proposed Project would not involve activities that could result in the demolition, relocation, conversion, rehabilitation, or alteration of the viaducts. Therefore, the operations phase of the proposed Project would not result in a substantial adverse change in the significance of the viaducts.

The Los Angeles River is significant for its association with flood control in the region; for facilitating the continued development of river-adjacent areas during and after World War II; and for its method of construction. During the operation of the proposed Project, existing access to the River via the LA River Access Tunnel on the west bank would be maintained. In addition, the west and east banks of the LA River channel would include reinforced concrete planted terraces on up to approximately 20,000 square feet of the west and east LA River banks. The proposed improvements are compatible with the size, scale and proportion, and massing of the existing concrete channel. The historical resource would not be materially impaired; therefore, the proposed Project would not cause a substantial adverse change in the significance of the LA River.

The Downtown Los Angeles Industrial Historic District (District) is significant for its role as the City's primary industrial district from the late nineteenth century through World War II. The Project Site is located outside the District boundaries. Though the proposed Project would introduce a new visual element to the area southeast of the District, the impact would be less than significant. Given the Project Site's location outside of the District, the proposed Project would not substantially change the spatial relationships between the District's significant components. As the Project would not materially impair the District, it would not result in a substantial adverse change to the historical resource.

The historic associations and character defining features that convey the significance of the four historical resources in the Project Area would not be affected by the activities associated with the operations phase of the proposed Project. Therefore, impacts during operation would be less than significant and no mitigation measures are required.

**V(b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

Operation of the proposed Project would not involve any ground-disturbing activities. Therefore, there would be no potential to disturb, damage, or degrade an archaeological resource or its setting. No operational impacts on archeological resources would occur and no mitigation measures are required.

**V(c): Disturb any human remains, including those interred outside of formal cemeteries?**

Operation of the proposed Project would not involve any ground-disturbing activities. Therefore, there would be no potential to disturb any human remains. Because operation of the proposed Project would not involve any ground-disturbing activities, no operational impacts on human remains would occur and no mitigation measures are required.

**XVIII: Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California Register of Historical Resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?**

Operation of the proposed Project would not involve ground disturbing activities; therefore, operation of the proposed Project would not disturb prehistoric Native American remains nor cause an adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Because operation of the proposed Project would not involve any ground-disturbing activities, no operational impacts on sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American Tribe would occur and no mitigation measures are required.

### 3.4.5 Best Management Practices

**BMP-CUL-1: Archaeological Monitoring During Excavation**

A qualified archaeological monitor shall conduct archaeological monitoring in the West Park and East Park for excavations at depths greater than 5 feet. Monitoring efforts may be reduced or eliminated for those portions of the Project Area shown to have been recently disturbed by construction activities associated with the Sixth Street Viaduct Project.

**BMP-CUL-2: Tribal Cultural Resources Sensitivity Training**

The City shall invite a qualified tribal representative from the Gabrieleño Band of Mission Indians to a pre-construction meeting to provide a training session to the construction contractor regarding potential tribal resources that could be encountered during construction activities and procedures to follow should a tribal resource be encountered.

**BMP-CUL-3: Tribal Cultural Resources Monitoring During Excavation**

The City shall retain and compensate for the services of a Tribal monitor who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the Project Area. The Tribal monitor shall only be present on-site during the construction phases that involve ground-disturbing activities in the proposed Arts Plaza. Monitoring efforts may further be reduced or eliminated for those portions of the proposed Arts Plaza that (1) are underlain with artificial fill of known origin, (2) require superficial scraping of land at depths less than five feet, or (3) are demonstrated to have been recently disturbed by construction activities associated with the Sixth Street Viaduct Project. The on-site monitoring shall cease when the grading and excavation activities in the proposed Arts Plaza are completed, or when the Tribal representatives and monitor have indicated that the site has a low potential for impacting tribal cultural resources.

#### **BMP-CUL-4: Unanticipated Discovery of Archaeological and Tribal Cultural Resources**

In the event that potentially significant buried archaeological materials are encountered within the Project Area, all work in the vicinity must stop until the archaeological and Tribal monitor can visit the site and assess the significance of the resource. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the City regarding treatment and curation of these resources. Work may continue on other parts of the Project Area while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]).

#### **BMP-CUL-5: Unanticipated Discovery of Human Remains**

Health and Safety Code Section 7050.5, Section 15064.5(e) of the CEQA Guidelines, and PRC Section 5097.98 mandate the process to be followed in the unlikely event of an unanticipated discovery of human remains in a location other than a dedicated cemetery. The Los Angeles County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner must then determine within two working days of being notified if the remains are subject to his or her authority.

If the Coroner recognizes the human remains (including bone fragments and funerary objects) to be Native American, he or she must contact the NAHC by phone within 24 hours. The NAHC then designates a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD will then have the opportunity to recommend to the Project proponent means for treating or disposing of, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification.

### **3.4.6 Mitigation Measures**

Impacts on Cultural Resources would be less than significant; therefore, mitigation measures are not required.

### **3.4.7 Significant Unavoidable Adverse Impacts**

There are no significant unavoidable adverse impacts on archaeological, historical, or tribal cultural resources resulting from construction and operation of the proposed Project.

### **3.4.8 Cumulative Impacts**

#### **3.4.8.1 Historical Resources**

Potential impacts to the four historical resources in the Project Area (Fourth Street Viaduct, Seventh Street Viaduct, the Los Angeles River, and the Downtown Los Angeles Industrial Historic District) would be less than significant. Only one resource, the Los Angeles River, would be directly affected. A previously approved project, the Sixth Street Viaduct Replacement Project, is currently underway and involves replacement with the historic Sixth Street Viaduct over the Los Angeles River with a new bridge. No impacts on the historic properties of the Los Angeles River were identified in the EIR prepared for the Sixth Street Viaduct Replacement Project. A foreseeable future project, the Los Angeles River Bike Path Gap Closure Project, would involve an extension of existing segments of the 32-mile greenway proposed in the Los Angeles River Revitalization Master Plan. This future project would take place along the Los Angeles River from Elysian Valley through Downtown Los Angeles

to the City of Vernon. The bike path improvements proposed by the Gap Closure Project would impact the Los Angeles River in a manner similar to the improvements proposed by the PARC Project. Therefore, the impact of the Gap Closure Project to the Los Angeles River is expected to be less than significant. In addition, it is expected that the Gap Closure Project would also be required to comply with applicable regulatory requirements and include similar best management practices. Therefore, cumulative impacts to historical resources would be less than significant and would not be cumulatively considerable.

#### **3.4.8.2 Archaeological Resources**

Archaeological monitoring would be conducted in the West Park and East Park for excavations at depths greater than five feet. In the event that potentially significant buried archaeological materials are encountered within the Project Area, all work in the vicinity must be halted until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. In addition, the City will continue working with the tribe in accordance with the requirements of AB 52. Impacts to archaeological resources would be less than significant. It is expected that related projects and other future development would also be required to comply with applicable regulatory requirements and include similar best management practices. Therefore, cumulative impacts to archaeological resources would be less than significant and would not be cumulatively considerable.

#### **3.4.8.3 Tribal Cultural Resources**

The Project Site is sensitive for prehistoric Native American remains. The City will continue working with the tribe in accordance with the requirements of AB 52. Impacts to Tribal Cultural Resources would be less than significant. It is expected that related projects and other future development would also be required to comply with applicable regulatory requirements and include similar best management practices. Therefore, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable.