

## **IV. Environmental Impact Analysis**

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### **K. Tribal Cultural Resources**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project's potential impacts on tribal cultural resources. The evaluation of potential impacts to tribal cultural resources is based on coordination with California Native American tribes that are traditionally and culturally affiliated with the Project Site, as well as a review of the Sacred Land Files records search conducted by the Native American Heritage Commission. This section is also based on the *Tribal Cultural Resources Report for the Sunset Gower Enhancement Project* (Tribal Cultural Resources Report) prepared by Dudek (September 2018) included as Appendix K of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains.

On September 25, 2014, Governor Brown signed into law Assembly Bill (AB) 52, which amended Public Resources Code (PRC) Section 5097.94 and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to establish that an analysis of a project's impact on cultural resources include whether the project would impact "tribal cultural resources." As set forth in PRC Section 21074:

*(a) "Tribal cultural resources" are either of the following:*

*(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*

*(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.*

*(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.<sup>1</sup>*

*(2) 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 Section 5024.1.<sup>2</sup> In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

*(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*

*(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2,<sup>3</sup> or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2<sup>4</sup> may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).*

For a project for which a notice of preparation for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. Section 21080.3.1(b) of the PRC defines “consultation” with a

<sup>1</sup> Per subdivision (k) of Public Resources Code Section 5020.1, “local register of historical resources” means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

<sup>2</sup> Subdivision (c) of Public Resources Code Section 5024.1 provides the National Register criteria for listing of historical resources in the California Register.

<sup>3</sup> Per subdivision (g) of Public Resources Code Section 21083.2, a unique archaeological resource means 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: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

<sup>4</sup> Per subdivision (h) of Public Resources Code Section 21083.2, a nonunique archaeological resource means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.

cross-reference to Government Code Section 65352.4, which applies when local governments consult with tribes on certain planning documents and states the following:

*“Consultation” means the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party’s sovereignty. Consultation shall also recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.*

The provisions in Section 21080.3.2(a) of the PRC enumerate topics that may be addressed during consultation, including identification of the significance of tribal cultural resources, determination of the potential significance of project impacts on tribal cultural resources and the type of environmental document that should be prepared, and identification of possible mitigation measures and project alternatives.

Section 21084.3 of the PRC also states that public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. This section of the PRC also includes examples of mitigation measures that may be considered to avoid or minimize the significant adverse effects.

Consultation ends when either of the following occurs prior to the release of the environmental document:<sup>5</sup>

1. Both parties agree to measures to avoid or mitigate a significant effect on a tribal cultural resource. Agreed upon mitigation measures shall be recommended for inclusion in the environmental document (PRC Section 21082.3(a)); or
2. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Sections 21080.3.2(b)(1)-(2) and 21080.3.1(b)(1)).

With regard to human remains, CEQA Guidelines Section 15064.5 addresses consultation requirements if an initial study identifies the existence of, or the probable likelihood of Native American human remains within the project site. This section of the

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<sup>5</sup> Governor’s Office of Planning and Research, *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*, November 14, 2005.

CEQA Guidelines as well as Health and Safety Code Section 7050.5 and PRC Section 5097.9 also address treatment of human remains in the event of accidental discovery.

## **b. Existing Conditions**

### **(1) Current Project Site Conditions**

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is an existing major motion picture and television studio and is currently developed with creative office space, production support, sound stages, and vacant restaurant space. The Project Site also includes three parking structures providing a total of 1,335 parking spaces.

According to the Tribal Cultural Resources Report, existing development within the Project Site is underlain by Urban land-Palmview-Tujunga complex, associated with a thin layer of human-transported materials spread over the surface over alluvial fans and floodplains derived from granitic sources. As further discussed in the Tribal Cultural Resources Report, due to the size and nature of past development associated with the Project Site and vicinity, all native subsurface soils with potential to support the presence of cultural deposits have been substantially disturbed.<sup>6</sup> Historical maps indicate the presence of small drainages within two miles east of the Project Site, and the now channelized Los Angeles River, which is located approximately 4.5-miles to the east of the Project Site.

### **(2) City of Los Angeles Ethnographic Context**

As provided in the Tribal Cultural Resources Report, based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact in the 16th century. The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families. Tribes in the Los Angeles region have traditionally spoken Takic languages that may be assigned to the large Uto-Aztecan family. These groups include the Gabrieleño, Cahuilla, and Serrano.

The archaeological record indicates that the Gabrieleño arrived in the Los Angeles Basin around 500 B.C. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast. The name “Gabrieliño” or “Gabrieleño” denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrieleño area proper as well as other social groups. Therefore, in the post-Contact

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<sup>6</sup> Refer to page 13 of the Tribal Cultural Resources Report included as Appendix K to this Draft EIR.

period, the name does not necessarily identify a specific ethnic or tribal group. The names by which Native Americans in southern California identified themselves have, for the most part, been lost. Many modern Gabrieleño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and refer to themselves as the Tongva, within which there are a number of regional bands. This term (Tongva) is used in the remainder of this section to refer to the pre-Contact inhabitants of the Los Angeles Basin and their descendants.

Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands: San Clemente; San Nicolas; and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000, but recent ethnohistoric work suggests a number approaching 10,000.

The large ethnographic Tongva village in the region was that of Yanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of the Pueblo of Los Angeles (Downtown Los Angeles). This village was reportedly first encountered by the Portola expedition in 1769. In 1771, Mission San Gabriel was established and Mission records indicate that 179 Gabrieleño inhabitants of Yanga were recruited to San Gabriel Mission. Based on this information, Yanga may have been the most populated village in the Western Gabrieleño territory.

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed.

A wide variety of tools and implements were used by the Tongva to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands.

Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels.

At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and also taught the people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws. The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups even as Christian missions were being built. The Chinigchinich religion may represent a mixture of native and Christian belief and practices.

Deceased Tongva were either buried or cremated, with burial more common on the Channel Islands and the neighboring mainland coast and cremation predominating on the remainder of the coast and the interior. Cremation ashes have been found buried within stone bowls and in shell dishes, as well as scattered among broken ground stone implements. These archaeological finds correspond with ethnographic descriptions of an elaborate mourning ceremony that included a wide variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased. At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period.

### (3) Assembly Bill 52 Consultation

In compliance with the requirements of AB 52, Department of City Planning staff provided formal notification of the Project to the tribes listed below on March 9, 2018. Letters were sent via FedEx and certified mail to the following California Native American tribes that requested notification:

- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians—Kizh Nation
- Gabrielino-Tongva Tribe
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

One response was received by the City on May 16, 2018 from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians—Kizh Nation, who asserted the following:

*[A]fter further review of the project site, Chairman Salas found that the project area is not in a highly sensitive area to the tribe. Therefore at this time a consultation is not needed nor is a Native American Monitor needed at the project site. With that being said, we would like to request that we be notified if any cultural resources are inadvertently found at the project site during any ground disturbing activities.*

No other responses or requests for consultation were received. Therefore, the City has completed and fulfilled its consultation obligations under AB 52. Copies of notification letters, verification of mailing, and correspondence received from the tribal representative are included as Appendix K of this Draft EIR.

#### (4) Background Research

##### *(a) Sacred Lands File Review*

Sacred Sites/Lands File Searches were conducted by the California Native American Heritage Commission for the Project on May 7, 2018. The results of the Sacred Sites/Lands File searches indicated negative results, meaning that no known graves or other Native American sacred lands are associated with the Project Site. The results of these records searches are included in Appendix K of this Draft EIR.

##### *(b) California Historical Resources Information System Review*

As provided in the Tribal Cultural Resources Report included in Appendix K of this Draft EIR, a California Historical Resources Information System records search at the South Central Coastal Information Center was conducted on May 7, 2018 as part of the preparation of the Project's Tribal Cultural Resources Report. The records search included South Central Coastal Information Center's collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation site records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Project Site vicinity, the National Register, the California Register, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

##### *(i) Previously Conducted Cultural Resource Studies*

Results of the cultural resources records search indicated that 36 previous cultural resource studies have been conducted within 0.5-mile of the Project Site between 1983

and 2012. Of these, only one study is mapped as overlapping the Project Site, and is summarized below.

**LA-11797:** Chattel Architecture, Planning & Preservation, Inc. (Chattel Architecture) prepared historic context statements and intensive-level assessment surveys for the 1,107-acre Hollywood Redevelopment project site. The Project Site is within the Hollywood Redevelopment area. The goal of the historic context statements and field surveys conducted by Chattel Architecture was to evaluate properties for eligibility for local, state, or national designation to focus efforts on preserving those buildings that best illustrate the unique narratives of each community, while allowing for appropriate economic development. While the study did not address archaeological resources within the Hollywood Redevelopment area, it did provide insight into the historic development of the Project Site and vicinity. Specifically, the study described the transformation of upscale residences lining Hollywood Boulevard throughout the 1920s into intensive commercial use. As elite residents moved to communities west of Hollywood, Sunset Boulevard grew in importance as a connective artery between Los Angeles, the movie studios in Hollywood, and the movie star homes farther west. During the 1920s and early 1930s, a number of studios were established within the Hollywood district. By the 1920s most studios were utilizing an architectural expression based on the factory model, which suited the processes associated with the production of movies. Hollywood also continued to function as a night-time entertainment center. With the end of Prohibition in 1933, many bars opened in the area, and it began to appear shabby to the middle-class residents. With the entry of the United States into World War II, inexpensive nightclubs and bars were developed along Hollywood Boulevard and Sunset Boulevard to support the influx of servicemen into the area during this time. Coming out of World War II, the United States was the leading record producing country in the world, with 1945 sales of \$109 million. There are two dominant property types documented by this study in association with the recording industry in Hollywood: recording studios and record company headquarters buildings. More than 30 record companies located throughout the area documented by this study were present in 1947, most of which were on Hollywood, Sunset, or Santa Monica Boulevards.

*(ii) Previously Recorded Cultural Resources*

According to the Tribal Cultural Resources Report, a large number of previously recorded cultural resources are located in the vicinity of the Project Site. All but one of these resources are historic-age built environment resources and no prehistoric archaeological resources have been previously recorded within half a mile of the Project. The single archaeological resource consists of historic-age features indicative of pre-World War II occupants in the area (P-19-003454).

(c) *Ethnographic Research and Review of Academic Literature*

As part of the preparation of the Project's Tribal Cultural Resources Report, academic and ethnographic literature and materials were reviewed for information pertaining to past Native American use of the Project Site area. This review included consideration of sources identified during past tribal consultations with the City, notably the 1938 Kirkman-Harriman Historical Map often referenced by the Gabrieleño Band of Mission Indians-Kizh Nation. Figure 3 of the Tribal Cultural Resources Report, included in Appendix K of this Draft EIR, shows the general location of the Project Site relative to features identified on a 1938 Kirkman-Harriman historical map. Based on this map, the Project Site is immediately west of El Camino Real, southeast of two Native American Villages (the nearest mapped approximately 0.78-miles away), and approximately three miles northeast of the nearest of the tar pits associated with the La Brea Tar Pit area.

The 1938 Kirkman-Harriman historical map is highly generalized due to scale and age, and may be somewhat inaccurate with regard to distance and location of mapped features. Additionally, the 1938 Kirkman-Harriman historical map was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833). Although the map contains no specific primary references, it corresponds with the details documented by the Portola expedition (circa 1769-1770). However, no information relating to the two village sites mapped nearest to the Project Site was provided within the technical reports reviewed as part of the records search for the Tribal Cultural Resources Report prepared for the Project.

According to the Tribal Cultural Resources Report, at the time of Portola's expedition, and through the subsequent mission period, the area surrounding the Project Site would have been occupied by Western Gabrieleno/Tongva inhabitants. One study made an effort to map the traditional Gabrieleno/Tongva cultural use area through documented family kinships included in mission records. This process allowed for the identification of clusters of tribal villages (settlements) with greater relative frequencies of related or married individuals than surrounding areas. Traditional cultural use area boundaries, as informed by other ethnographic and archaeological evidence, were then drawn around these clusters. The relative sizes of these villages were also inferred from their relative number of mission-period recruits. The nearest village site to the Project Site was Cabuepet (or Cahuenga), located near the northern opening of the Cahuenga Pass, approximately four miles northwest of the Project Site. This village was located near what is now Universal Studios. Mission records indicate that 123 Native American neophytes came from this village, second only to the number of recruits from Yanga in the Western Gabrieleno territory. Campo de Cahuenga was also in this vicinity, which is the site where the 1847 treaty between General Andres Pico and Lieutenant-Colonel John C. Fremont marked the surrender of Mexican California to the United States.

The La Brea Tar Pits area (CA-LAN-159) was a known area of Native American use for hunting and the gathering of tar. The largest village in the vicinity was likely Yabit (or Yanga), located approximately 5.5 miles to the southeast of the Project Site. Mission records indicate that 179 Gabrieleño inhabitants of Yanga were recruited to San Gabriel Mission, indicating that it may have been the most populated village in the Western Gabrieleño territory. In general, the mapped position of both Yanga and Cahuenga have been substantiated through archaeological evidence, although the archaeological record has been substantially compromised by rapid and early urbanization throughout much of the region. No archaeological evidence of the two nearest villages on the 1938 Kirkman-Harriman map was provided in the SCCIC records search results or review of other archaeological information. Notwithstanding, based on review of pertinent academic and ethnographic information, the Project Site is located within the boundaries of the Gabrieleño/Tongva traditional territory. However, no Native American tribal cultural resources have been previously documented in areas that may be impacted by the Project.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to Tribal Cultural Resources if it would:

***Threshold (a): 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:***

- i. 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), or***
- ii. 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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

The L.A. CEQA Thresholds Guide does not include any criteria to evaluate tribal cultural resources impacts. Thus, the potential for the Project to result in impacts related to

tribal cultural resources is based on the State CEQA Guidelines Appendix G thresholds provided above.

## **b. Methodology**

A California Historical Resources Information System records search was conducted for the Project Site and a 0.5-mile radius around the Project Site to determine potential impacts associated with tribal cultural resources. The records search included a review of mapped prehistoric, historic, and built environment resources; Department of Parks and Recreation Site Records; technical reports; ethnographic references; historical maps; the California Historic Property Data File; the National Register of Historic Places, California Register of Historical Resources, California State Historical Landmarks, and California Points of Historical Interest listings; and the Archaeological Determinations of Eligibility. Pertinent academic and ethnographic literature was also reviewed for information pertaining to past Native American use of the project area. Consultation with California Native American Tribes was conducted to address potential impacts associated with Native American resources. In addition, a Sacred Lands Files search was conducted by the Native American Heritage Commission to determine the presence of any recorded tribal cultural resources on the Project Site.

## **c. Project Design Features**

No specific project design features are proposed with regard to tribal cultural resources.

## **d. Analysis of Project Impacts**

***Threshold (a): Would the Project 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:***

- i. 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), or***

### **(1) Impact Analysis**

As discussed above in Subsection 2.b.(4), no pre-historic archaeological sites, or other resources documented to be related to past Native American activity, have been previously identified within the Project Site. According to the Tribal Cultural Resources

Report, a large number of previously recorded cultural resources are located in the vicinity of the Project Site. All but one of these resources are historic-age built environment resources and no prehistoric archaeological resources have been previously recorded within half a mile of the Project. The single archaeological resource consists of historic-age features indicative of pre-World War II occupants in the area (P-19-003454). None of the recorded resources are located on the Project Site and would not be affected by development of the Project. **Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. As such, no impacts to such resources would occur.**

## (2) Mitigation Measures

Project-level impacts related to tribal cultural resources would be less than significant, and no mitigation is required.

## (3) Level of Significance After Mitigation

Project-level impacts related to tribal cultural resources determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

***Threshold (a): Would the Project 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:***

- ii. 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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

## (1) Impact Analysis

As presented above in Subsection 2.b.(4), the results of the records searches (i.e., South Central Coastal Information Center and Native American Heritage Commission) conducted for the Project Site and the independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site and vicinity

included in the Tribal Cultural Resources Report prepared for the Project demonstrate that no known tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site which could be affected by the Project. **Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined to be significant pursuant to PRC Section 5024.1(c). As such, no impacts to such resources would occur.**

## (2) Mitigation Measures

Project-level impacts related to tribal cultural resources would be less than significant, and no mitigation is required.

## (3) Level of Significance After Mitigation

Project-level impacts related to tribal cultural resources determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

# e. Cumulative Impacts

## (1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are a total of 105 related projects in the vicinity of the Project Site. The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In addition, as previously described, no tribal cultural resources are identified within ½ mile of the Project Site. Notwithstanding, in the event that tribal cultural resources are uncovered, each related project would be required to comply with the applicable regulatory requirements discussed in detail above in Subsection 2.a. In addition, related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. **Therefore, cumulative impacts to tribal cultural resources would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts related to tribal cultural resources would be less than significant, and no mitigation is required.

### (3) Level of Significance After Mitigation

Cumulative impacts related to tribal cultural resources determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.