

IV. Environmental Impact Analysis

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 the *Tribal Cultural Resources Report for the Angels Landing Project* (TCR Report) prepared by Dudek (October 2020) included as Appendix K.1 of this Draft EIR. The impact analysis is also based on the coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project Site, a California Historical Resources Information System (CHRIS) records search completed by the South Central Coastal Information Center (SCCIC), as well as a review of the Sacred Land File (SLF) records conducted by the Native American Heritage Commission (NAHC).

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 5020.1.¹

(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 5024.1.² 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 21083.2,³ or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2⁴ 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. PRC Section 21080.3.1(b) defines “consultation” with a

¹ Per subdivision (k) of PRC 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.

² Subdivision (c) of PRC Section 5024.1 provides the National Register criteria for listing of historical resources in the California Register.

³ Per subdivision (g) of PRC 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.

⁴ Per subdivision (h) of PRC 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 new provisions in PRC Section 21080.3.2(a) lists 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.

PRC Section 21084.3 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:⁵

- 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

⁵ 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 and Setting

The Project Site is comprised of an approximately 2.24-acre site that contains the Los Angeles Metropolitan Transportation Authority's (Metro) B (formerly Red) and D (formerly Purple) Lines Pershing Square Station and vacant land. The existing topography of the Project Site slopes down from the northeast along Olive Street at approximately 355 feet above mean sea level to the southwest near the Hill Street/4th Street intersection at approximately 285 feet above mean sea level (an elevation differential of approximately 70 feet).

The Project Site is situated in Downtown Los Angeles, approximately 13 miles northeast of the Pacific Ocean. Existing development is underlain by Quaternary alluvium and marine deposits, generally dating between the Pliocene and the Holocene. Soils are predominantly classified by the U.S. Department of Agriculture as Urban land, commercial, and complex, and are associated with low-moderate slope alluvial conditions.⁶ The Project Site was substantially disturbed by grading which occurred mainly during the 1960s and 1970s. Due to the size and nature of past development all native subsurface soils with potential to support the presence of cultural deposits have likely been disturbed. However, there is a possibility that subsurface tribal cultural resources could be present. Historic-age refuse deposits generally post-dating the primary period of Native American use of this area have been recorded approximately 0.5 mile to the west. Historical maps indicate the presence of at least three drainages surrounding the Project Site, the most prominent being the Los Angeles River, which has since been channelized to the east.

(2) City of Los Angeles Ethnographic Context

According to the TCR Report, the history of the Native American communities in the Los Angeles region prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief and generally peripheral accounts were prepared with the intent of furthering respective colonial and economic aims and were

⁶ U.S. Department of Agriculture, Natural Resources Conservation Service, *Web Soil Survey, Survey Area Data*, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, 2018, accessed October 28, 2019.

combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early 20th century. In addition, it is important to note that while many of those providing information for these early ethnographies were able to provide information based on personal experience, a significantly large proportion of these informants were born after 1850, by which time Native Americans would have had considerable contact with Europeans. This is important to note when examining these ethnographies since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

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. 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 Juanefío and Luiseño to the southeast. The name “Gabrielino” denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrielino area proper, as well as other social groups, and 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 Gabrielino 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. The term, Tongva, is used in the remainder of this section to refer to the inhabitants of the Los Angeles Basin and their descendants prior to contact with the Europeans.

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 persons, but recent ethnohistoric work suggests a number approaching 10,000 persons.

The nearest large ethnographic Tongva village was that of Yanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of downtown Los Angeles. This village was reportedly first encountered by the expedition led by Captain Gaspar de Portola 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 Cahuenga village, second in size but less thoroughly documented, was located slightly closer to the mission, just north of the Cahuenga Pass.

The Tongva exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches for food. Acorns were the staple food and 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. The Tongva also 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. Catalina Island steatite was used to make ollas and cooking vessels. Plank canoes and tule balsa canoes were used for fishing, travel, and trade between the mainland and the Channel Islands.

At the time of Spanish contact, the basis of Tongva religious life was the cult of Chinigchinich, who was considered an important heroic mythological figure. Chinigchinich was known to give instruction on laws and institutions, as well as dance, which was the primary religious act for the Tongva society. While the Chinigchinich religion seems to have been relatively new when the Spanish arrived, it spread south into the Southern Takic groups even as Christian missions were being built. As such, 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. However, at the behest of the Spanish missionaries, cremation essentially ceased.

(3) Assembly Bill 52 Notification and Consultation

In compliance with the requirements of AB 52, the City of Los Angeles (City) provided formal AB 52 notification of the Project to applicable Native American representatives on July 12, 2018. Letters were sent to the following California Native American tribes that requested notification:

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

No communication or request for consultation were received from any tribes in response to the AB consultation letters sent out by the City and the City has concluded the consultation process.⁷

(4) Background Research

(a) Sacred Lands File Review

An SLF search request was submitted to the NAHC for the Project on June 5, 2018. The NAHC replied via email on June 6, 2018, stating that the Sacred Lands File search was completed with negative results. The NAHC recommended contacting tribes associated with the Project Site in order to avoid unforeseen discoveries once the Project has started and provided a list of tribal representatives to contact for additional information. As stated above, all California Native American tribes that requested notification were contacted as part of the AB 52 consultation process, with no responses received by the City.⁸

(b) California Historical Resources Information System Review

A CHRIS records search at the SCCIC was conducted on July 24, 2018, for the Project Site and a 0.5-mile radius around the Project Site as part of the preparation of the TCR Report. The records search included SCCIC's collections of mapped prehistoric,

⁷ Milena Zasadzien, e-mail to Robert Hilman of Eyestone Environmental, October 24, 2019.

⁸ Milena Zasadzien, e-mail to Robert Hilman of Eyestone Environmental, October 24, 2019.

historical, and built environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. The results of the confidential records search are on file at the City for review by qualified individuals.

(i) Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 90 previous cultural resource studies have been conducted within a 0.5-mile radius of the Project Site between 1992 and 2017. Of these, six intercept or overlap with the Project Site and one is adjacent. Summaries of the six studies that overlap with the Project Site are provided in the TCR Report. No tribal cultural resources were identified in any of the studies that intercept or overlap with the Project Site.

(ii) Previously Recorded Cultural Resources

According to SCCIC records, a total of 181 previously recorded cultural resources are located within the 0.5-mile record search area. Of these, 172 resources are historic-era buildings or structures, 61 of which are districts and/or elements of a district; and the remaining nine resources are archaeological sites.

The nine previously recorded archaeological resources include eight historic-era sites and one prehistoric site; none of these recorded resources are on the Project Site. The prehistoric-era archaeological resource (P-19-120015) is a burial site previously recorded approximately 0.5 mile northeast of the Project Site. This resource includes documented human remains identified as Native American in origin, encountered in 1957 during trenching activities, approximately 11 feet below the street surface. While this resource has been recorded in the surrounding area, government-to-government consultation initiated by the City as part of the AB 52 consultation process has not resulted in the identification of a tribal cultural resource within the Project Site.⁹

(c) Ethnographic Research and Review of Academic Literature

As part of the preparation of the TCR Report, academic and ethnographic literature and materials were reviewed for information pertaining to potential past Native American use of the Project Site. This review included consideration of sources commonly identified through consultation, notably the 1938 Kirkman-Harriman Historical Map often referenced by the Gabrieleño Band of Mission Indians—Kizh Nation (see Figure 3 of the TCR Report, included in Appendix K.1 of this Draft EIR). Based on this map, the Project Site is located immediately south of El Camino Real and near the intersection of several trails that were

⁹ Milena Zasadzien, e-mail to Robert Hilman of Eyestone Environmental, October 24, 2019.

indicated to have been established before 1890. It should be noted that this map is highly generalized due to scale and age and may be somewhat inaccurate with regard to distance and location of mapped features. Additionally, this 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 matches with the details documented by the Portola expedition (circa 1769–1770). While the map is a valuable representation of post-mission history, substantiation of the specific location and uses of the represented individual features would require review of archaeological or other primary documentation on a case-by-case basis.

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 Gabrieleño/Tongva inhabitants. The village site nearest to the Project Site was *Yanga* (or *Yabit*), located approximately 1 mile east of the Project Site, near the location of present-day Union Station. In general, the mapped position of Yanga has been substantiated through archaeological evidence, although the archaeological record has been substantially compromised by rapid and early urbanization throughout much of the region. After the founding of Los Angeles, Yanga was forcibly moved, and the Native Americans in the area formed a new village near the northwest corner of Los Angeles Street and 1st Street, approximately 0.5 mile northeast of the Project Site. This second Native American village site, known by the Spanish name *Rancheria de los Poblanos*, was only occupied until about 1836. The Native American communities in Los Angeles were relocated again, this time east of the Los Angeles River. After 1836, Native Americans were forcibly relocated another three times, in 1845, 1846, and 1847. No archaeological evidence of the nearest village on the 1938 Kirkman-Harriman map was provided in the SCCIC records search results or review of other archaeological information; however, these fell outside of the archaeological records search area.

Although the Project falls within the boundaries of the Gabrieleño/Tongva traditional territory and is located relatively close to the original location of Yanga, as well as the reported location of *Rancheria de los Poblanos*, no tribal cultural resources have been previously documented in areas that may be impacted by the Project.

(d) Pedestrian Survey for Tribal Cultural Resources

No tribal cultural resources were identified at the Project Site during an intensive-level pedestrian survey of the Project Site conducted by Dudek on June 5, 2018.

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 the project 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.***

In assessing impacts related to tribal cultural resources in this section, the City will use Appendix G as the thresholds of significance. The *L.A. CEQA Thresholds Guide* does not include any criteria to evaluate tribal cultural resources impacts.

b. Methodology

A CHRIS records search was conducted at the SCCIC on July 24, 2018, in order to determine potential impacts associated with tribal cultural resources. This search encompassed a 0.5-mile radius beyond the Project Site. The records search included a review of mapped prehistoric, historic, and built environment resources; DPR Site Records; technical reports; archival resources; and ethnographic references. Historic aerial photographs were reviewed to identify the past history of development at the Project Site, and pertinent academic and ethnographic literature was reviewed for information pertaining to past Native American use of the Project Site. Pursuant to AB 52, California Native American Tribes were notified and provided an opportunity to request consultation in order to address potential impacts associated with Native American resources. In addition, an SLF search was conducted by the NAHC to determine the presence of any recorded tribal

cultural resources on the Project Site. Lastly, a pedestrian survey of the Project Site was conducted for evidence of tribal cultural resources.

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),***
- 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

The estimated depth of excavation for the subterranean parking and building foundations would be approximately 70 feet below grade. It is estimated that approximately 334,000 cubic yards of soil would be exported and hauled from the Project Site during the excavation phase.

As discussed above in Subsection 2.b.(4), on page IV.K-7, no pre-historic archaeological sites, or other resources documented to be related to past Native American activity, have been previously recorded within the Project Site according to the SLF and SCCIC records searches conducted for the Project. SCCIC records indicate there are a total of 181 previously recorded cultural resources within the 0.5-mile records search radius of the Project Site. These include 172 historic-era buildings or structures, 61 of which are districts and/or elements of a district, and nine archaeological sites. One of the previously recorded archaeological sites is a prehistoric burial (P-19-120015) located approximately

0.5 mile northeast of the Project Site. While this resource has been recorded in the surrounding area, AB 52 consultation initiated by the City, and the tribal cultural resources report prepared for the Project, has not resulted in the identification of a tribal cultural resource within the Project Site.¹⁰ Furthermore, the Project Site has been previously graded and developed. Thus, native subsurface soils with potential to support the presence of cultural deposits have been disturbed multiple types by prior demolition and redevelopment activities that historically occurred on the Project Site. In addition, based on Dudek's independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site, as well as a pedestrian survey, there is no record or evidence of known tribal cultural resources on the Project Site or in its immediate vicinity. As such, no known or suspected tribal cultural resources or known cultural resources have been identified that could be impacted by the Project. Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any resources determined by the City to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Furthermore, the City applies its standard TCR condition of approval to projects that disturb soil to address the inadvertent discovery of TCRs during grading activities. **Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe.**

(2) Mitigation Measures

As discussed above, the Project Site does not contain any known tribal cultural resources. No mitigation is required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As provided in Section III, Environmental Setting, of this Draft EIR, a total of 50 related projects have been identified in the vicinity of the Project Site.

¹⁰ Milena Zasadzien, e-mail to Robert Hilman of Eyestone Environmental, October 24, 2019.

The Project and the related projects are located within an urbanized area that has been disturbed and developed over time. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts could occur if the Project, related projects, and other future development affected the same tribal cultural resources and communities. As discussed above, there are no known tribal cultural resources that would be affected by the Project. In addition, the City applies conditions of approval to projects that disturb soil to ensure that impacts to tribal cultural resources would be less than significant in the event of inadvertent discovery. Furthermore, the closest related projects to the Project Site are Related Project Nos. 1 and 2. Related Project No. 1, Equity Residences, is located across Hill Street from the Project Site. The City determined that this Project would have less than significant impacts on tribal cultural resources.¹¹ Related Project No. 2, Fifth and Olive, is under construction and is separated from the Project Site by existing high-rise buildings. The City also determined that Related Project No. 2 would result in less than significant impacts to tribal cultural resources.¹² Neither of these related projects overlap with the Project in areas of physical ground disturbance. Notwithstanding, in the event that unknown 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. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to tribal cultural resources would be less than significant without mitigation.

¹¹ *City of Los Angeles Department of City Planning, Sustainable Communities Environmental Assessment (SCEA) for the 340 S. Hill St. Equity Residential Mixed-Use Project, September 2019, Section V, Environmental Impact Analysis*

¹² *City of Los Angeles Department of City Planning, 5th and Hill Draft EIR, November 2018, Section IV.L, Tribal Cultural Resources.*