

## **3.14 TRIBAL CULTURAL RESOURCES**

This section of the Draft EIR provides an analysis of the potential impacts on tribal cultural resources, including Native American historic, cultural, and sacred sites, as well as sites, features, places, objects, and landscapes that have cultural value to California Native American tribes.

### **3.14-1 Regulatory Framework**

Federal, state, regional and local regulations concerning tribal cultural resources are described in the following section.

#### **3.14-1.1 *Federal Regulations***

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

The National Historic Preservation Act established the National Register of Historic Places (NRHP) to recognize resources associated with the country's history and heritage. Criteria for listing in the NRHP is set forth in 36 CFR 60.4, which states the quality of significance in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are:

- > Associated with events that have made a significant contribution to the broad patterns of our history;
- > Associated with the lives of persons significant in our past;
- > Embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; and/or
- > Have yielded or may be likely to yield information important to history or prehistory.

Criterion D is usually applied to archaeological resources. Properties eligible for the NRHP must be of sufficient age; be proven through scholarship to meet at least one of the significance criteria; and exhibit integrity of the features, elements, and/or informational value, which provides the property its documented historical or archaeological significance. Additionally, Section 101(d)(6)(A) of the National Historic Preservation Act allows properties of traditional religious and cultural importance to a tribe to be determined eligible for inclusion in the NRHP.

#### **3.14-1.2 *State and Regional Regulations***

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

CEQA is intended to prevent significant avoidable impacts to the environment by requiring feasible alternatives or mitigation measures. If cultural resources are identified within the resource study areas (RSAs), the sponsoring agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the cultural resource.

The CEQA Guidelines (Section 15064.5(a)) define a "historical resource" as the following:

- > California properties formally determined eligible for, or listed in, the California Register of Historical Resources (CRHR).

- > Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code (PRC), or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- > Those resources that a lead agency determines to be historically significant provided the determination is based on substantial evidence.
- > Resources not listed in or previously determined eligible for listing in the state or local registers but determined by a lead agency as historical resources as defined in PRC sections 5020.1(j) or 5024.1.

### **California Register of Historical Resources**

Created in 1992 under Assembly Bill (AB) 2881, the CRHR is designed to identify historical resources deemed worthy of preservation on a state level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing in the NRHP, including tribal resources. The State Historic Preservation Officer maintains the CRHR, which may also include properties designated under local ordinance or identified through local historical resources surveys that meet CRHR eligibility criteria. A historical resource (including the historic built-environment and historic and prehistoric archaeological resources) is considered significant if it meets one of the four criteria for listing in the CRHR. These criteria are set forth in CEQA Section 15064.5 and defined as any resource that:

- > 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;
- > Is associated with the lives of persons important to local, California, or national history;
- > Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- > Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Historical resources must also possess integrity, possess the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance, and retain enough of this historic character or appearance to be recognizable as a historical resource and to convey the reasons for this significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

### **Assembly Bill 52**

On September 25, 2014, Governor Jerry Brown signed into law AB 52. The law went into effect on July 1, 2015. The intent of AB 52 is to "set forth a process and scope that clarifies California tribal government involvement in the CEQA process, including specific requirements and timing for lead agencies to consult with tribes on avoiding or mitigating impacts to tribal cultural resources." It applies to projects that require an EIR or a Negative Declaration/Mitigated Negative Declaration.

AB 52 defined a new resource category called tribal cultural resources, amended the CEQA statute, and required amendments to the CEQA Guidelines to address consultation with California Native American tribes as a part of the CEQA process. Pursuant to PRC Section 2108.3.2, Tribal Governments can request consultation with a lead agency and give input regarding potential impacts to tribal cultural resources before the agency decides what type of environmental review is necessary for a project. The PRC further

requires avoiding damage to tribal cultural resources, if feasible. If not, lead agencies must mitigate impacts to tribal cultural resources to the extent feasible.

Section 21074 of the PRC defines “tribal cultural resources” as a resource that is either of the following:

- > Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- > 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. 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.
  - 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.
  - A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

### **California Health and Safety Code**

California Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during the course of California projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate “the manner and cause of any death” and make recommendations concerning treatment of the human remains. The County Coroner must make their determination within two working days of being notified. If the human remains are determined to be Native American, the County Coroner shall contact the California Native American Heritage Commission (NAHC). The Commission would in turn “...immediately notify those persons it believes to be most likely descended from the deceased Native American.” The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants may include the scientific analysis of the remains and associated items.

### **California Native American Historical, Cultural, and Sacred Sites Act**

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. This law requires that if human remains are discovered, construction or excavation activity must cease, and the County Coroner must be notified. If the remains are of a Native American, the County Coroner must notify the NAHC. The NAHC then notifies those persons most likely to be descended from the Native American whose remains were discovered. The California Native American Historical, Cultural, and Sacred Sites Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

### **3.14-1.3 Local Regulations**

There are no specific regulations or guidelines regarding Tribal Cultural Resources in the Cities of Lawndale, Redondo Beach, or Torrance.

### **3.14-2 Methodology**

The following section discusses the methodology applied to date for the identification of tribal cultural resources potentially affected by the Proposed Project and Options. These methods include delineation of the RSA, archival research, field survey, and evaluation of potential impacts to TCRs resulting from the Proposed Project and Options. The tribal cultural resources studies were conducted by cultural resources specialists who meet the Secretary of the Interior's Professional Qualifications Standards (36 Code of Federal Regulations Part 61) in Archaeology and Architectural History.

Each RSA consists of the area of direct impact, which consists of the three-dimensional area of potential ground disturbance for the Proposed Project and Options, including all staging areas and other areas of temporary impact. RSA maps are attached as Appendix 3.14-A, Tribal Resource Study Area Maps.

Archival research was conducted at the South Central Coastal Information Center (SCCIC) on June 19, 2020, to identify previously conducted cultural resource investigations and previously recorded cultural resources within an approximate half-mile buffer of the RSAs. The results of the records search are discussed in Section 3.14-3.3.

One archaeological resource, P-19-000100, is documented as overlapping each RSA. This resource was recorded in 1939 with little context, as the archaeologist recorded the artifacts based on secondhand information from an informant. It was documented as two groundstone artifacts. As it is recorded, resource P-19-000100 does not appear eligible for inclusion in the NRHP, CRHR, or local register. Although the resource would be of Native American origin, it could only qualify as an isolate due to the limited resource count. Therefore, it does not appear to meet the threshold of significance for it to constitute a tribal cultural resource. This resource is discussed in more detail in Section 3.14-3.3.

A review of ethnographic source material was performed for this study. The research was conducted for the Proposed Project and Options and included review of ethnographic maps and standard ethnographic works for California Native American tribes that have historically occupied the vicinity of the RSAs. No potential tribal cultural resources were identified in the area within a half-mile radius of the Proposed Project, Trench Option, or Hawthorne Option RSAs during this ethnographic literature review.

A Sacred Lands File (SLF) search was requested from the NAHC. Documents pertaining to the SLF search are attached as Appendix 3.13-B, NAHC Correspondence. The results of the NAHC Sacred Lands File search are presented in Section 3.14-3.6.

Review of the SCCIC results, NAHC results, historic maps and aerial photographs, and other local historical sources informed the development of a prehistoric and historic setting for potential and known cultural resources in the Proposed Project vicinity.

Cultural resources specialists conducted a reconnaissance cultural resources survey of all RSAs on November 5, 2020. Previously recorded cultural resources were also revisited. No archaeological materials were observed, and no resources of Native American origin were identified during the field survey. Complete results of the survey are included in the archaeological report for this Draft EIR.

AB 52 acknowledges that "California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated." One purpose of the bill is to encourage government agencies to consult with

Native American governments in order to draw on this expertise and to identify and mitigate for potential impacts to tribal cultural resources. The Proposed Project will comply with all AB 52 requirements.

Metro initiated consultation February 2, 2021, via mail and email. All seven individuals identified by the NAHC as potentially interested parties in consultation were contacted. A 30-day response notice was provided. See section 3.14-3.6 and Appendix 3.13-B, NAHC Correspondence for additional information.

### **3.14-2.1 Resource Study Area**

The RSA for tribal cultural resources, as shown in Figure 3.14-1 and in Appendix 3.14-A, Tribal Resource Study Area Maps, was delineated based on the proposed physical configuration of the Proposed Project, including areas where ground disturbance and property acquisitions may occur. It is defined as the area necessary to construct, operate, and maintain the Proposed Project, including all the areas of planned ground-disturbance (temporary or permanent), and property acquisitions.

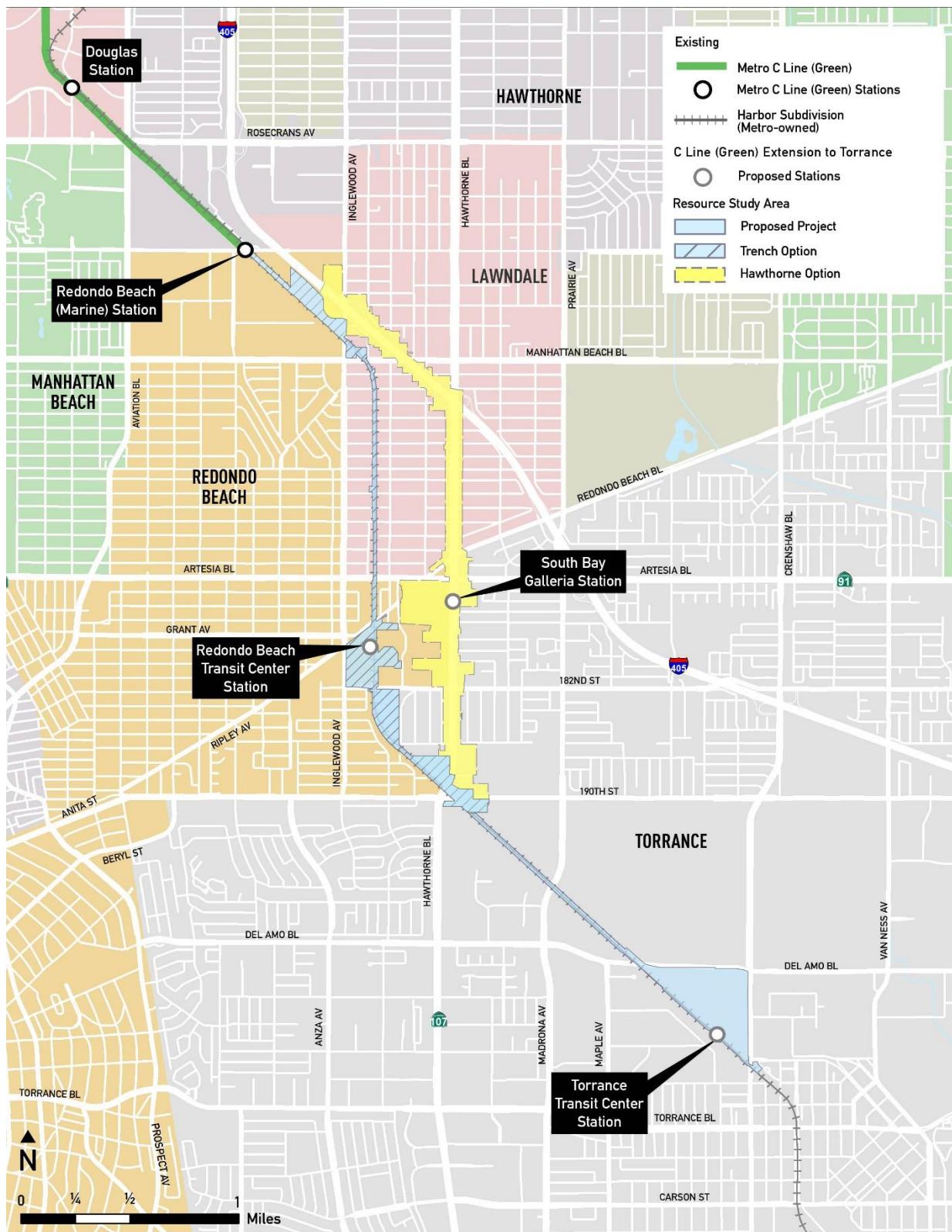
The RSA includes portions of the existing Metro-owned right-of-way (Metro ROW) and adjacent areas that would be used for project-related facilities, including stations, an overhead contact system, traction power substations, communications and signaling buildings, and temporary staging areas. All lay-down areas or other areas of temporary ground disturbance are considered part of the Proposed Project footprint.

Where light rail infrastructure would be constructed at or below grade within the existing Metro ROW (the Proposed Project and Trench Option), the RSA is limited to the extent of the Metro ROW, because the existing freight railroad infrastructure is already a component of the setting within the ROW, and the introduction of similar infrastructure is unlikely to result in new indirect impacts on cultural resources in areas adjacent to the Metro ROW. Where new light rail infrastructure is constructed outside of the existing Metro ROW or would require above-grade elements, such as the overhead contact system, elevated structures, sound walls, stations, or other equipment, the RSA includes the first tier of parcels or buildings adjacent to the Metro ROW within a reasonable viewshed of the new construction; i.e., the introduction of new infrastructure would have the potential to cause new visual, audible, or atmospheric intrusions on the setting of any adjacent tribal cultural resources.

To differentiate the potential impacts of the Proposed Project, the Trench Option, and the Hawthorne Option separately, the RSA is further delineated for each Option footprint (see Figure 3.14-1 and Appendix 3.13-A, Tribal Resource Study Area Maps). The Proposed Project and the Trench Option share the same horizontal RSA due to a spatial similarity in construction and operational impact potential, with a slight vertical RSA difference.

The Hawthorne Option RSA differs from the Proposed Project and Trench Option RSAs, as the proposed elevated alignment would be located outside of the Metro ROW. The Hawthorne Option RSA includes the first tier of parcels or buildings adjacent to the Hawthorne Option alignment within a reasonable viewshed of the new construction; i.e., the introduction of new infrastructure would have the potential to cause new visual, audible, or atmospheric intrusions on the setting of any adjacent tribal cultural resources.

**Figure 3.14-1. Resource Study Area**



Source: AECOM, 2022; STV, 2022

### **3.14-2.2 Significance Thresholds**

Based upon the thresholds of significance contained in Appendix G of the CEQA Guidelines, implementation of the Proposed Project would result in a significant impact if any of the following occurred:

The Proposed Project caused a substantial adverse change in the significance of a Tribal Cultural Resource, defined in PRC 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 PRC section 5020.1(k), or
- 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

### **3.14-2.3 Project Features**

As described in Chapter 2, Project Description, a number of features have been incorporated into the Proposed Project to ensure compliance with the laws, guidelines, or best practices of federal, state, local, and regional agencies. There are no specific project features for tribal cultural resources.

## **3.14-3 Affected Environment / Existing Conditions**

The Proposed Project, Trench Option, and Hawthorne Option footprints are described in Section 3.14-2.1 above. The RSAs for the Proposed Project and Options are entirely developed within the County of Los Angeles, which is territory traditionally occupied by the tribe known to anthropologists and historians as the Gabrielino, and which tribal descendants call the Tongva or Kizh. One resource of Native American origin is documented within or adjacent to the Proposed Project, Trench Option, and Hawthorne Option. No resources within the RSA have been determined by a state agency to be tribal cultural resources.

### **3.14-3.1 Prehistoric and Ethnographic Setting**

The first evidence of human occupation in the Los Angeles area dates to at least 9000 years before present (B.P.) (McCawley, 1996). The broader peopling of the Los Angeles Basin is associated with the Millingstone period, beginning approximately 6500 B.P. (Wallace, 1955; Warren, 1968). Millingstone populations established stable settlements located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates).

By 3500 B.P., a number of socioeconomic changes occurred (Erlandson, 1994; Wallace, 1955; Warren 1968) that are associated with the period known as the Intermediate Horizon (Wallace, 1955). Increasing population size necessitated the intensification of existing terrestrial and marine resources (Erlandson, 1994). The Intermediate Horizon marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and nonutilitarian materials were acquired, and travel routes were extended. Archaeological evidence suggests that the margins of numerous rivers, marshes, and swamps within the Los Angeles River drainage served as ideal

locations for prehistoric settlement during this period. The Los Angeles River (Gumprecht, 1999) and the wetlands associated with its mouth have attracted human settlement for millennia.

The Late Prehistoric period spans from approximately 1500 B.P. to the Spanish mission era. A sharp increase in the number of archaeological components seems to indicate population growth at this time, and artifact assemblages reflect continued technological improvements. Settlement at this time is believed to have revolved around a relatively limited number of permanent settlements that were located centrally with respect to a variety of resources. By the end of the Late Prehistoric, patterns had emerged that are associated with the ethnohistoric Gabrielino (McCawley, 1996).

The native people of the Los Angeles Basin and Sana Ana Plain, including the southern Channel Islands and the majority of today's Los Angeles and Orange Counties and part of Riverside County, are known as the Gabrielino. They were given this name by the intruding Spanish after Mission San Gabriel Arcangel, which was established in their territory; today Gabrielino descendants call themselves Tongva or Kizh. The Gabrielino spoke a Takic, Uto-Aztec language related to the neighboring Juaneno, Luiseno, and Cahuilla, but linguistically distinct from the languages of their northern neighbors the Chumash and, further south, the Kumeyaay (Bean and Smith, 1978; Johnston, 1962; Kroeber, 1925; McCawley, 1996).

The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith, 1978). The Gabrielino are estimated to have numbered around 5,000 in the pre-contact period (Kroeber, 1925). Maps produced by early explorers indicate the existence of at least 40 Gabrielino villages, but as many as 100 may have existed prior to contact with Europeans (Bean and Smith, 1978; McCawley, 1996; Reid, 1939 [1852]).

Late Prehistoric Gabrielino subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith, 1978; Reid, 1939 [1852]). The bow and arrow first appear during this period. Frequently occurring mortars and pestles signify the growing importance of acorn exploitation, and fishing kits include a wide variety of implements. The primary plant resources were the acorn, gathered in the fall and processed with mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly leafed-cherry (Reid, 1939 [1852]).

With an expansive territory that encompassed rich island, coastal, and inland environments, the Gabrielino developed a robust society with intensive regional economic interactions. Structurally, families were organized into lineage groups that were headed by a chief or tomyaar. Sedentary communities consisted of one or more of these lineage groups in which power relations and political authority were variable. Communities were regularly in contact with one another through a system of annual "ritual congregations" in which elites and non-elites were able to forge strong social, political, and economic bonds. Religious and craft-based organizations and guilds were a major structuring element of Gabrielino society as well. Soapstone, bone, wood, and plant-based crafts were produced by skilled individuals and were exchanged in local and regional settings. Some Gabrielino shamans have been documented as participating in the elite Chumash religious and political group known as the antap. Additionally, the Gabrielino religion associated with the creator-god Chengiichngech spread through much of Southern California and persisted through missionization (McCawley, 1996; Vargas, 2003).

Recent research on Gabrielino prehistory indicates that prior to contact, village and other habitation sites were situated around estuaries and organized in a hierarchical manner. The sizes of these settlements were variable throughout the basin, with differences related to the resource capacity of

nearby estuaries (Glassow et al., 2007). While habitation sites at larger estuaries were expansive, settlement patterns near limited estuarine environments exhibited more mobile Rancheria style habitation practices in which smaller groups of people congregated during specific times of the year and dispersed across the landscape during times of resource stress (Weil, 1984; Glassow, 2007:210). These Late period patterns likely persisted up until the interruption of Gabrielino social structure which occurred with European contact and missionization.

### **3.14-3.2 *Historic Setting***

#### **3.14-3.2.1 *Spanish Period***

Spanish explorers made brief visits to Gabrielino territory in both 1542 and 1602, and, on both occasions, the two groups exchanged trade items. Gabrielino villages are reported by early explorers to have been most abundant along the coast and the dominant rivers of the Los Angeles Basin, including the Los Angeles, San Gabriel, and Santa Ana Rivers. The Long Beach area was particularly favored by the Gabrielino due to its protected bays and inlets (Johnston, 1962).

Sustained contact with Europeans did not commence until after 1769, when Gaspar de Portolá and a small Spanish contingent explored the California coast from San Diego to Monterey. The goal of the expedition was to establish a Spanish presence in Alta California, thereby discouraging Russian or English settlement. The party crossed Gabrielino territory twice during its journey and was received warmly with gifts of antelope and rabbit meat (McCawley, 1996:188). Shortly after the Portolá expedition, Spanish settlement increased. A string of 21 missions was established in the years that followed the Portolá expedition, including Mission San Gabriel Archangel in 1771 and Mission San Fernando Rey in 1797. These and many others were placed strategically across western California, systematically disrupting traditional Gabrielino society. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system.

#### **3.14-3.2.2 *Mexican Period***

Alta California became a state when Mexico won its independence from Spain in 1821. In 1822, Rancho Sausal Redondo, the “Round Clump of Willows,” was provisionally granted to Antonio Ygnacio Avila (Dixon and Roberts, 2005). Rancho Sausal Redondo stretched from present-day Playa del Rey to Redondo Beach, including modern-day El Segundo, Manhattan Beach, Hawthorne, Inglewood, Lawndale and portions of Redondo Beach (Dixon and Roberts, 2005).

After Mexico won independence from Spain in 1821, the authority of the California missions gradually declined, culminating with their secularization in 1834. Native Americans who had become dependent upon the missions were disenfranchised, and most Gabrielino neophytes either fled to the north or sought work as laborers from nearby private landowners. Former mission lands were quickly divided and granted to private citizens for use as agricultural and pastoral land (Reid, 1939 [1852]).

Of the divided land, very little was given to Gabrielino people. Only 20 former Gabrielino residents of Spanish Missions were provided any land; of which was very little. In 1846 there was an effort to fight against this. A petition was signed by 140 Gabrielinos to demand access to old mission lands. However, by then the 1.5 million acres of mission land had already been doled out to Californio colonist families (Hernandez, 2017).

Throughout this time, Gabrielino families resided within the San Gabriel township and now diversified Yaanga village near today’s downtown Los Angeles. However, by the mid-1800s, the settlement of Yaanga was forced to move east across the Los Angeles River (Singleton, 2004).

### **3.14-3.2.3 Early American Period**

The United States took control of California at the end of the Mexican-American War with the Treaty of Guadalupe-Hidalgo in 1848. Regarding Gabrielino sovereignty, nothing changed under new American occupation. Individuals and families were moved to various communities across the Los Angeles Basin, including San Jacinto, Temecula, Pechanga, Highland Park, and Eagle Rock (Hernandez, 2017). Native American men were often subjected to unfair criminalization, where they disproportionately experienced prison and indentured servitude. By the mid-19th century there was an estimated 1,000 Gabrielino left; living throughout the Los Angeles Basin working mostly servant and ranch jobs and being Christianized at an alarming rate (Singleton, 2004).

In 1850, California was admitted into the Union as the 31st state. The Dominguez Family held the title to Rancho San Pedro through the transition of California to statehood. President Buchanan signed the U.S. land patent for Rancho San Pedro in 1858. Although reduced to 25,000 acres due to sales and new surveys, Rancho San Pedro was still a massive holding into the nineteenth century. Antonio Avila retained the title to Rancho Sausal Redondo under the U.S. government after a court ruling in 1856. In 1868, Sir Robert Burnett acquired Rancho Sausal Redondo. Burnett leased 25,000 acres of the property to Catherine Freeman, the wife of Daniel Freeman, in 1873 (Freeman Family Papers, 2010).

The RSAs are located in the former lands of Rancho San Pedro and Rancho Sausal Redondo, or Rancho Centinela. As these lands were sold and subdivided in the late nineteenth century and the early twentieth century, several factors influenced the patterns of land use and community development in the area. These factors included expansion of the transportation network and its accompanying real estate speculation, the discovery of oil and its exploitation, and the concentration of the aviation industry and its development into the military-industrial complex. As these factors affected the region, individual and distinctive communities grew within their influence.

### **3.14-3.3 Archival Research and Ethnographic Study**

#### **3.14-3.3.1 South Central Coastal Information Center Records Search Summary**

An archival records search request for the Proposed Project was sent via email to the SCCIC housed at California State University, Fullerton on April 30, 2020. The records search was completed by SCCIC staff on June 19, 2020. The research focused on the identification of previously recorded historic built environment and archaeological resources within an approximate half-mile radius of the RSAs. The archival research involved a search of records, including historical site inventories, archaeological site records and reports, and historic U.S. Geological Survey (USGS) topographic maps. Documents pertaining to the records search results are attached as Appendix 3.13-D, SCCIC Archaeological Records Search Results.

#### **Previous Cultural Resources Investigations**

The records search identified a total of 37 investigations previously conducted within a half-mile radius of the Proposed Project. Of these, 36 are within a half-mile radius of the Proposed Project and Trench Option footprints while 26 are within a half-mile radius of the Hawthorne Option footprint. Nine previous studies overlap the Proposed Project and Trench Option RSAs while 12 overlap the Hawthorne Option RSA. These reports are summarized in Section 3.13, Cultural Resources, Table 3.13-1.

#### **Previously Recorded Cultural Resources**

The records search at the SCCIC identified 13 previously recorded cultural resources within a half-mile radius of the Proposed Project. Of these, all 13 are within a half-mile radius of the Proposed Project and

Trench Option footprints, while seven are within a half-mile-mile radius of the Hawthorne Option footprint. One previously recorded cultural resource of Native American origin overlaps with all of the RSAs: P-19-000100/CA-LAN-100. This resource is summarized in Table 3.14-1 and discussed below.

**Table 3.14-1. Previously Recorded Cultural Resource Site of Native American Origin within RSAs**

Primary Number <sup>1</sup>	Resource Name	Resource Description	Date	NRHP/CEQA Eligibility Status
000100	Unnamed	Prehistoric campsite	Not dated	Not Evaluated

Source: SCCIC, AECOM 2022

<sup>1</sup>Primary numbers are prefixed with "P-19- "

P-19-000100 (CA-LAN-100) – This prehistoric archaeological resource was recorded as one of a series of small prehistoric campsites in Torrance by F.H. Racer in 1939. Racer states, “The only artifacts I know of being found there was a large metate and a mano stone,” i.e., prehistoric stone tools (Racer, 1939:5). Racer also notes these artifacts “may have been extraneous” (Racer, 1939:5), although he does not explain what he means by extraneous. In other words, this site is represented by only two stones which Racer’s informant believed were artifacts. It is clear from his description that Racer did not see the artifacts, nor did he personally observe any evidence of an archaeological site. The precise location where these artifacts were found is not recorded, but the resource is documented near the intersection of 190th Street and Hawthorne Boulevard.

The site appears on the SCCIC’s maps as an arbitrarily-drawn 500-foot diameter circle with its midpoint within the intersection of 190th Street and Hawthorne Boulevard. This circle overlaps the RSAs delineated for the Proposed Project, Trench Option, and Hawthorne Option.

It is unclear whether these objects, which were documented based on hearsay, were genuine artifacts. Moreover, if they were genuine artifacts, it is not clear from the available data that this was an archaeological site rather than two isolated artifacts, nor is it clear whether the find was located within or simply near the RSAs. As it is recorded, resource P-19-000100 (CA-LAN-100) appears to consist of only two isolated artifacts and therefore does not appear eligible for inclusion in the NRHP, CRHR, or local register.

#### **Historic and Ethnographic Maps**

Maps used to analyze the historic development of the freight railroad within half-mile of the RSAs are listed in Table 3.14-2.

**Table 3.14-2. Historic Maps**

Title	Source	Description	Date
Redondo	USGS	15-Minute Topographic Quadrangle	1896
Inglewood	USGS	7.5-Minute Topographic Quadrangle	1924
Torrance	USGS	7.5-Minute Topographic Quadrangle	1924
Native Sites in Part of Southern California	Kroeber	Ethnographic overview map	1925
Inglewood	USGS	7.5-Minute Topographic Quadrangle	1930
Kirkman-Harriman Map	Kirkman	Pictorial and Historical Map of Los Angeles County to 1860	1937
Redondo	USGS, War Department	15-Minute Topographic Quadrangle	1944
Gabrielino Communities	McCawley 1996:56	Gabrielino communities located on the Los Angeles-Santa Ana Plain	1996
Tongva Villages	Sutimiv-Pa'alat, Keepers of Indigenous Ways	Gabrieleño-Fernandeño villages of the Los Angeles Basin	2010
Kizh Tribal Territory	Salas et al.	Gabrielino Indian Lands	2016

Source: AECOM, 2022

Examination of the historic topographic maps shows a segment of the Redondo Branch of the AT&SF Railway overlapping with the northern portion of the RSAs (USGS, 1896 Redondo 15-Minute Quadrangle). By 1944, the illustrated AT&SF (later the BNSF Harbor Subdivision) segment matched the present-day rail configuration except for a portion of the freight railroad within the Hawthorne Option RSA (USGS, 1944 Redondo 15-Minute Quadrangle).

Examination of ethnographic maps prepared by local historians, early anthropologists including A.L. Kroeber, and modern Native American tribal leaders revealed no Native American villages within the RSA. None of the historic or ethnographic maps indicate the existence of potential tribal cultural resources within the RSAs.

### **3.14-3.3.2 Additional Historical and Ethnographic Research**

Additional archival research was conducted for the RSAs. Several online databases, including the historic aerial photographs available through Historic Aerials and Sanborn Fire Insurance Maps available through the Los Angeles Public Library (LAPL), were consulted to identify physical changes over time in the RSAs.

Historic and modern aerial photographs demonstrated the significant changes that occurred in the development of the RSA and its vicinity from the 1950s to the present (NETROnline, 2020). Sanborn Fire Insurance Maps were available for the City of Los Angeles from 1888 to 1955 and the City of Torrance from 1916 to 1932. Sanborn maps depicted the AT&SF Redondo Branch in the RSA in 1929 (LAPL 1906–1950) and 1929–1950 (LAPL 1906–1951). The SF&LAH (now BNSF Harbor Subdivision) was depicted as early as 1928 (LAPL 1906–1951). In addition, historic newspapers and historic context statements for the City of Torrance, the City of Redondo Beach, and the City of Lawndale were also reviewed, as was published ethnographic material.

### **3.14-3.4 Present Day Development**

Knowledge of the current development of the RSAs and vicinity informs an analysis of potential impacts to tribal cultural resources. The sensitivity of the area for unknown tribal cultural resources is

substantially reduced by development, which is likely to destroy archaeological sites that have the potential to be tribal cultural resources. Moreover, new indirect visual impacts tend to be less than significant when construction occurs within an already developed and visually cluttered landscape.

Within the RSA for the Proposed Project and Trench Option, the current Metro ROW extends through or borders several jurisdictions, including Hawthorne, Redondo Beach, Lawndale, and Torrance. Metro purchased the Harbor Subdivision freight corridor in 1993 with plans to build passenger rail service. BNSF freight railroad continues to operate along what is now the Metro ROW. A large portion of the current Metro ROW is bordered by industrial, office and retail/commercial land uses. However, between Manhattan Beach Boulevard and 190th Street, the Metro ROW is located near residential land uses. One of these adjacent residential areas lie on both sides of the current Metro ROW between Manhattan Beach and Artesia Boulevards within the Cities of Redondo Beach and Lawndale. These residences were constructed between the 1930s and the 1970s. South of Artesia Boulevard, land uses located adjacent to the Metro ROW include residences built in the 1950s and 1960s, as well as condominium developments (Los Angeles County Office of the Assessor, 2020). In addition, the Pacific Crest Cemetery (established in 1902) and El Nido Park are located adjacent to the Metro ROW near 182nd Street and the Redondo Beach/Torrance city border. South of the intersection of Hawthorne Boulevard and 190th Street, there are no residential land uses until south of Crenshaw Boulevard (past the southern terminus of the Proposed Project). The area between Hawthorne and Crenshaw Boulevards includes heavy industrial land uses, such as the Torrance Refining Company facilities, which have visually dominant industrial features.

### **3.14-3.5 Field Survey**

Cultural resources specialists conducted a reconnaissance cultural resources survey of the RSAs on November 5, 2020, noting and photographing any potential cultural resources for recordation. A supplemental survey was conducted by Alec Stevenson, M.A., RPA, on June 21, 2022.

The purpose of these surveys was to discover and document new cultural resources of Native American origin, as well as to identify any surviving elements of P-19-000100, a previously recorded prehistoric resource, that were visible within or adjacent to the RSAs and assess its current condition and identify any potential impacts to the resource. Survey methodology varied depending on accessibility and development. The survey included the area of direct impact along Hawthorne Boulevard, southwest edge of the Interstate 405 (I-405), and Railroad Avenue in the City of Redondo Beach. The survey along Hawthorne Boulevard was limited to a pedestrian survey on both the east and west sides of the paved street (Figure 3.14-2). The survey on the southwest edge of I-405 and beside the existing BNSF freight railroad tracks consisted of a “windshield survey” with opportunistic pedestrian survey in accessible areas. The windshield survey (i.e., inspection by car) was done to identify areas with visible ground surface that could be surveyed and eliminate areas where survey was not feasible due to pavement or other obstructions.

Overall ground visibility was less than one percent throughout the entire survey due to paved streets, sidewalks, and ornamental vegetation. Unpaved areas consisted largely of road medians, road shoulders, and the margins of the existing freight railroad tracks, although most of these areas were landscaped and therefore had limited surface visibility.

As previously noted, the only archaeological resource documented within the RSA is P-19-000100. The resource was documented in 1939 based on hearsay as having consisted of one large metate and one mano (Racer, 1939:5). The artifacts were found at an unknown location near the intersection of Hawthorne Boulevard and 190th Street, an area that today is thoroughly developed. During the survey,

all unpaved areas within the resource boundary were examined using pedestrian survey techniques. This includes walking transects of 33-foot intervals while inspecting the ground, looking for artifacts partially exposed on the surface and coloration changes in soils that could be a sign of midden deposits.

This opportunistic pedestrian survey included exposed soils beneath the freight railroad underpass on Hawthorne Boulevard immediately north of 190th Street; grassy areas with zero ground visibility on the northwest, southwest, and southeast corners of the intersection; and the road median that exists in the center of Hawthorne Boulevard just north of the freight railroad, which also had little ground visibility due to landscaping. No artifacts, archaeological features, anthropogenic soils, or other evidence of an archaeological site was observed within the site boundaries, including that part of the site that overlaps the RSAs. Although this resource overlaps the RSAs for the Proposed Project, Trench Option, and Hawthorne Option, it is mostly intersected by the Proposed Project and Trench Option RSAs.

**Figure 3.14-2. Documented Location of P-19-000100 at Hawthorne Boulevard and 190th Street, View Northeast**



Source: AECOM, 2020

The cultural resource survey failed to locate P-19-000100 (CA-LAN-100) and no new prehistoric cultural resources were identified.

### **3.14-3.6 Sacred Land Files Search and Native American Contact Program**

An SLF search was conducted by the NAHC to identify any Native American cultural resources that may be Traditional Cultural Properties or tribal cultural resources and that might be affected by the Proposed Project, as required by CEQA as amended by AB 52. Documents pertaining to the SLF search are attached as Appendix 3.13-B, NAHC Correspondence. The following provides an overview of the process and results.

A letter was mailed to the NAHC on April 30, 2020, requesting that an SLF search be conducted for the Proposed Project and Options. The NAHC responded to the request in a letter dated May 15, 2020, which stated “negative results” for the SLF search. The NAHC also provided a list of seven Native American representatives who may have knowledge of resources in or near the RSAs. The seven individuals were contacted as part of the Project AB 52 consultation.

### **3.14-3.7 Assembly Bill 52**

Letters via mail and email were sent by Metro on February 2, 2021, to the seven individuals identified by the NAHC as potentially being interested in consultation. These letters identified the lead agency (Metro), the Proposed Project location, the environmental document in production, and discussed the Proposed Project, including potential ground impacts. The letters gave a 30-day notice upon receipt of a response of interest to consult under AB 52. Follow-up emails were sent ten days later on February 12, 2021.

On March 5, 2021, one individual responded, Adrian Morales on behalf of the Gabrieleno Tongva San Gabriel Band of Mission Indians under the leadership of Chairman/Chief Anthony Morales. Adrian Morales said that the Gabrieleno Tongva San Gabriel Band of Mission Indians would like to participate in the consultation process, and there will be a follow-up correspondence letter with formal recommendations to address potential adverse effects to tribal cultural resources. Metro responded on May 10, 2021, with additional cultural resource information based on the archival research and survey. Follow-up emails were sent by Metro to Adrian Morales on May 25, July 12, July 29, and October 27, 2021, each requesting additional follow-up. There have been no responses since the initial communication and this Draft EIR will be transmitted to a representative of the Gabrieleno Tongva San Gabriel Band of Mission Indians to close consultation.

No other individuals representing California Native American Tribes responded or requested AB 52 consultation.

## **3.14-4 Environmental Impacts**

**3.14-4.1 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 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)?**

### **3.14-4.1.1 Construction Impacts**

**Less than Significant with Mitigation.** Potential construction impacts on tribal cultural resources would be related to shallow construction work and excavations. Shallow construction work such as for the at-grade portions of the Proposed Project have limited potential to encounter intact archaeological resources that may qualify as tribal cultural resources due to prior disturbance, but other proposed construction activities (e.g., retaining walls, drainage) have the potential to encounter intact resources that may have been buried under artificial fill.

The Proposed Project construction is not likely to impact any known tribal cultural resources. However, it is possible that unknown resources lay buried throughout the RSA and could be impacted by the Proposed Project construction. One resource, identified as P-19-000100 (CA-LAN-100) in the CHRIS records search, was identified within the RSA. As discussed in Section 3.14-3.3.1, the resource was last

documented in 1939 and its context and means of discovery is not fully known. Information is lacking as the artifacts were recorded through an informant and no artifacts were examined directly by an archaeologist. Although the recorder described them as two pieces of groundstone, their specific typology and locational context is unclear. In addition to this, the resource consists of two artifacts, which would normally qualify it as an isolate. The resource boundary as currently mapped by the SCCIC is a large buffer placed around the approximate location of these artifacts, and the area has been heavily disturbed since the original recordation. Because of this, the resource will not likely be further impacted during construction and would not qualify under any criteria of eligibility for the CRHR nor as a tribal cultural resource.

Despite prior disturbances, the excavations associated with the Proposed Project have the potential to adversely impact a significant tribal cultural resource. This would result in a significant impact.

Mitigation measure MM-CUL-1 (Cultural Resources Identification Training) would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 (Archaeologist Consultation) would also be implemented, which would establish procedures to stop work in the event of a resource discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Mitigation measure MM-CUL-3 (Unanticipated Discovery of Human Remains Associated with Known Cemeteries) would be implemented, which would establish a monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. In addition, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, the impact would be reduced to **less than significant**. Refer Section 3.13, Cultural Resources, for additional detail of these mitigation measures.

#### **TRENCH OPTION**

**Less than Significant with Mitigation.** As the Trench Option would locate the light rail tracks in a trench throughout most of the segment, and there would require additional excavation compared to the Proposed Project.

Because of the increased depths of excavation, there is an increased potential to encounter intact tribal cultural resources that may have been buried under artificial fill. Shallow construction work for the at-grade portions of the Trench Option have limited potential to encounter intact archaeological resources due to prior disturbance.

Excavation associated with the Trench Option has the potential to adversely impact a significant tribal cultural resource which would result in a significant impact. Mitigation measure MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to stop work in the event of a resource discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Refer to Section 3.13, Cultural Resources for additional detail of these mitigation measures. Mitigation measure MM-CUL-3 would be implemented, which would establish a monitoring program as well as treatment measures and avoidance strategies for any remains

that are identified. In addition, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, the impact would be reduced to **less than significant**.

#### **HAWTHORNE OPTION**

**Less than Significant with Mitigation.** The Hawthorne Option is entirely elevated, and construction activities such as the installation of piles for elevated structures have a lower potential to encounter intact tribal cultural resources, compared to shallower excavation for at-grade track. Resources are unlikely to be exposed because piles are twisted or vibrated into the soil while preparation and compaction of the subgrade is not typically required. The potential for encountering deeply buried resources during these types of construction activities is limited because surficial landforms are old and pre-date human occupation of the area.

Nevertheless, excavations associated with the Hawthorne Option have the potential to adversely impact a significant tribal cultural resource which would result in a significant impact. Mitigation measure MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to stop work in the event of a resource discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Mitigation measure MM-CUL-3 would be implemented, which would establish a monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. Refer to Section 3.13, Cultural Resources for additional detail of these mitigation measures. Finally, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, the impact would be reduced to **less than significant**.

#### **3.14-4.1.2 Operational Impacts**

**Less than Significant.** Operational activities of the Proposed Project would be limited to light rail operations on established tracks and at facilities constructed as a part of the Proposed Project. The operation of light rail transit traffic and other rail operations would not cause subsurface ground disturbance nor alter any existing setting that would impact a tribal cultural resource within the RSA. Therefore, the impact would be **less than significant**.

#### **TRENCH OPTION**

**Less than Significant.** Similar to the Proposed Project, activities during operation of the Trench Option would be limited to light rail operations on established tracks or at facilities. These types of operational activities would not have the potential to encounter tribal cultural resources and would not cause subsurface ground disturbance nor alter any existing setting that would impact a tribal cultural resource within the RSA. Therefore, the impact is **less than significant**.

#### **HAWTHORNE OPTION**

**Less than Significant.** Similar to the Proposed Project, activities during operation of the Hawthorne Option would be limited to light rail operations on established tracks or at facilities constructed. These

types of operational activities would not have the potential to encounter tribal cultural resources and would not cause subsurface ground disturbance nor alter any existing setting that would impact a tribal cultural resource within the RSA. Therefore, the impact is **less than significant**.

**3.14-4.2 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 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**3.14-4.2.1 Construction Impacts**

**Less than Significant with Mitigation.** No resources have been determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources within the RSA. However, excavations associated with construction have the potential to disturb and destroy an unknown significant tribal cultural resource. This disturbance of significant tribal cultural resources would result in a significant impact. Mitigation measure MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to stop work in the event of a discovery of a resource of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Mitigation measure MM-CUL-3 would be implemented, which would establish a monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. Refer to Section 3.13, Cultural Resources for discussion of these mitigation measures. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, the impacts would **less than significant**.

**TRENCH OPTION**

**Less than Significant with Mitigation.** Similar to the Proposed Project, there are no identified tribal cultural resources in the Trench Option RSA. However, construction of the Trench Option has the potential to disturb and destroy an unknown significant tribal cultural resource, and this would be a significant impact. Mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources, and establish procedures to stop work in the event of a resource discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 impacts would be **less than significant**.

**HAWTHORNE OPTION**

**Less than Significant with Mitigation.** Similar to the Proposed Project, there are no identified tribal cultural resources in the Hawthorne Option RSA. However, construction of the Hawthorne Option has the potential to disturb and destroy an unknown significant tribal cultural resource, and this would be a

significant impact. Mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources, and establish procedures to stop work in the event of a resource discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Therefore, with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, impacts would be **less than significant**.

#### **3.14-4.2.2 Operational Impacts**

**Less than Significant.** Operational activities of the Proposed Project would be limited to light rail operations on established tracks and at facilities constructed as a part of the Proposed Project. The operation of light rail transit and other rail operations would not cause subsurface ground disturbance nor alter any existing setting that would impact a resource of tribal significance within the RSA. Therefore, the impact would be **less than significant**.

#### **TRENCH OPTION**

**Less than Significant.** Similar to the Proposed Project activities during operation of the Trench Option would be limited to light rail operations on established tracks or at facilities. These types of operational activities would not have the potential to encounter tribal cultural resources and would not cause subsurface ground disturbance nor alter any existing setting that would impact a resource of tribal significance within the RSA. Therefore, the impact would be **less than significant**.

#### **HAWTHORNE OPTION**

**Less than Significant.** Similar to the Proposed Project, activities during operation of the Hawthorne Option would be limited to light rail operations on established tracks or at facilities. These types of operational activities would not have the potential to encounter tribal cultural resources and would not cause subsurface ground disturbance nor alter any existing setting that would impact a resource of tribal significance within the RSA. Therefore, the impact would be **less than significant**.

### **3.14-5 Mitigation Measures**

Mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 outlined in Section 3.13, Cultural Resources address the potentially significant impacts during construction.

### **3.14-6 Project Impacts Remaining After Mitigation**

#### **3.14-1.1. Proposed Project**

With the incorporation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as outlined in Section 3.13, Cultural Resources, the Proposed Project would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Proposed Project would be less than significant.

#### **3.14-6.1 Trench Option**

With the incorporation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as outlined in Section 3.13, Cultural Resources, the Trench Option would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Trench Option would be less than significant.

### **3.14-6.2 Hawthorne Option**

With the incorporation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, outlined in Section 3.13, Cultural Resources, the Hawthorne Option modifications would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Hawthorne Option would be less than significant.

### **3.14-7 Cumulative Impacts**

The methodology for cumulative analysis and a description of relevant projects and projections are included in Section 3.0, Introduction. The geographic scope of the cumulative analysis for tribal cultural resources are the RSAs, as impacts are generally site-specific and localized.

#### **3.14-7.1.1 Proposed Project**

The development of the Proposed Project in combination with other projects located in the adjacent area would increase the potential for impacts to tribal cultural resources and could contribute to the loss of such resources in the region. The potential that development consistent with local plans would impact tribal cultural resources during development is determined by a variety of factors, including the type of development that is proposed.

No tribal cultural resources have been identified within the Proposed Project RSA. However, the Proposed Project would have the potential to disturb unknown tribal cultural resources during construction. Should tribal cultural resources be discovered, Metro would comply with applicable federal, state, and local guidelines, including PRC Sections 2108.3.2 and 5097.98 and Health and Safety Code Section 7050.5. Mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 would be implemented, which would reduce the impact to less than significant. Probable future projects would be expected to comply with applicable federal, state, and local regulations to protect tribal cultural resources, and would implement project-specific mitigation measures during construction. Therefore, the Proposed Project in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction.

Operation of the Proposed Project would not cause subsurface ground disturbance that would impact a tribal cultural resource. Therefore, the Proposed Project in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during operation.

#### **3.14-7.1.2 Trench Option**

No tribal cultural resources have been identified within the Trench Option RSA. The potential for cumulative impacts on unknown tribal cultural resources from the Trench Option would be similar to the analysis presented above for the Proposed Project, and the impact would be less than significant with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3. The Trench Option in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction or operation.

#### **3.14-7.1.3 Hawthorne Option**

No tribal cultural resources have been identified within the Hawthorne Option RSA. The potential for cumulative impacts on unknown tribal cultural resources from the Hawthorne Option would be similar to the analysis presented above for the Proposed Project, and the impact would be less than significant with implementation of mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3. The Hawthorne

Option in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction or operation.