3.16 Tribal Cultural Resources

This section is based on the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report*, incorporated into this DEIR as Appendix G.

3.16.1 Regulatory and Policy Framework

Cultural Resources and Tribal Cultural Resources (TCR) in California are protected by several federal, state, and local regulations, statutes, and ordinances. Cultural resources are defined as buildings, sites, structures, or objects that may have historical, architectural, archaeological, cultural, and/or scientific importance. TCRs are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes that are listed in or eligible for listing in the California Register of Historical Resources (CRHR), listed in local historic registers, or determined by a lead agency to be significant resources.

3.16.1.1 Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) (54 United States Code [U.S.C.] 300101 et seq.) and its implementing regulations (36 Code of Federal Regulations [CFR] 800) establish a program for the preservation of historic properties throughout the United States (U.S.) and provide a framework for identifying and treating historical and archaeological resources under the National Environmental Policy Act. Section 106 of the NHPA requires that federal projects, or projects under federal jurisdiction, take into account the effect of an undertaking on properties listed in or eligible for listing in the National Register of Historic Places (NRHP).

The NHPA establishes the NRHP, which is “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 CFR 60.2). To be eligible for listing in the NRHP, a property typically must be at least 50 years old and possess significance in American history and culture, architecture, or archaeology to meet one or more of the following four established criteria (36 CFR 60.4):

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

Historic resources eligible for listing in the NRHP are considered “historic properties” and may include buildings, sites, structures, objects, and historic districts. A potential historic property less than 50 years of age may be eligible under NRHP Criteria Consideration G if it has exceptional significance, and it can be demonstrated that sufficient time has passed to understand its historical importance (National Park Service [NPS], 1997). To be eligible for listing in the NRHP, a property must also have integrity, which is defined as “the ability of a property to convey its significance.” The NRHP recognizes seven aspects or qualities that, in various combinations, define integrity: location, design, setting, materials, workmanship, feeling, and association (NPS, 1997).

The NHPA's implementing regulations include a provision for early and effective communication with interested parties, such as Native American tribes. Under provision 36 CFR 800.2(c)(2)(ii)(A), the lead agency is responsible for contacting local Native American representatives and informing them of the undertaking's intent and nature. The Native American representative is then provided "a reasonable opportunity to identify its concerns about historic properties; advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance; articulate its views on the undertaking's effects on such properties; and participate in the resolution of adverse effects."

American Indian Religious Freedom Act (42 U.S.C. 1996; 48 CFR 44716)

The American Indian Religious Freedom Act of 1978 (AIRFA) protects the rights of Native Americans to exercise their traditional religions by ensuring access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites. AIRFA is primarily a policy statement. AIRFA made it a policy to protect and preserve for American Indians, Eskimos, Aleuts, and Native Hawaiians their inherent right of freedom to believe, express, and exercise their traditional religions. AIRFA allows them access to sites, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rights. It further directs various federal departments, agencies, and other instrumentalities responsible for administering relevant laws to evaluate their policies and procedures, in consultation with Native American traditional religious leaders, to determine changes necessary to protect and preserve Native American cultural and religious practices.

3.16.1.2 State

California Environmental Quality Act Guidelines Section 15064.5

California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.) is intended to prevent avoidable significant impacts to the environment by requiring feasible alternatives or mitigation measures (MM). If cultural resources are identified within the Project Study Area, the lead agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the cultural resource and if it determined to be a historical resource per CEQA. If a project may cause a substantial adverse change in the significance of a historical resource impacts must be mitigated.

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

- California properties formally determined eligible for, or listed in, the California Register of Historical Resources.
- Those resources included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g).
- 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.

An archaeological resource may be determined to be a historical resource, as previously defined, or a "unique archaeological resource." CEQA requires lead agencies to consider whether a project will impact unique archaeological resources. PRC Section 21083.2(g) defines a unique archaeological resource as "an archaeological artifact, object, or site about which it can be clearly demonstrated that, without

merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person."

If an archaeological resource is determined not to be a unique archaeological or a historical resource, "the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process."

California Native American Historical, Cultural, and Sacred Sites Act

California PRC Sections 5097.9-5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the State of California Native American Heritage Commission (NAHC). 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 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.

Assembly Bill 52

Assembly Bill (AB) 52 revised several portions of the PRC to broaden the requirements for tribal consultation and to provide a more formal structure for tribes to provide meaningful input to protect their cultural heritage during the CEQA process. AB 52 states that, upon written request by a California Native American tribe, a CEQA lead agency must begin consultation once it determines that the project application is complete and before the agency issues a notice of preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration (PRC Sections 21080.3.4, 21080.3.2, and 21082.3). AB 52 also required that the state CEQA Guidelines Appendix G (i.e., the sample environmental checklist) be revised to include a new category for TCRs. A TCR is defined as 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.

PRC Section 21074 states that to be considered a TCR, a resource must fall within one of the following two categories:

- Listed or determined to be eligible for listing in the national, state, or local register of historic resources; or
- A resource that the lead agency determines, in its discretion and supported by substantial evidence, to treat as a TCR pursuant to the criteria in PRC Section 50241(c). PRC Section 5024.1(c) provides that a resource meets criteria for listing as a historic resource in the CRHR if any of the following apply:

- It is associated with the events that have made significant contribution to the broad patterns of California's history and cultural heritage.
- It is associated with the lives of persons important in our past.
- It embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- It has yielded, or may be likely to yield, information important in prehistory or history.

AB 52 explicitly recognizes that California Native American tribes may have expertise regarding their tribal history and practices that concern the TCRs with which they are traditionally and culturally affiliated. The significance of a resource to Native American tribes should be given consideration in the application of CRHR criteria for TCRs. One of the purposes of AB 52 is to establish a meaningful dialogue between the CEQA lead agency and Native American tribes through government-to-government consultation to identify and protect TCRs.

The NAHC is the primary state agency responsible for identifying Native American sacred sites and maintaining a Sacred Lands File (SLF) to that end. In addition, the NAHC identifies Most Likely Descendants when Native American human remains are discovered anywhere other than a designated cemetery.

Health and Safety Code Sections 7052 and 7050.5

Section 7052 of the Health and Safety Code states that the disturbance of human remains is a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

3.16.2 Methodology

3.16.2.1 Resource Study Area

The specialized Resource Study Area (RSA) for TCRs was delineated based on the proposed physical configuration of the project alternatives and maintenance and storage facility (MSF) sites (Figure 3.16-1 through Figure 3.16-5).

The Tribal Cultural RSA is defined as the geographic area where the Project has potential to have direct and indirect impacts to TCRs. The Tribal Cultural RSA includes areas where temporary or permanent ground disturbance may occur, such as all proposed right-of-way (ROW), acquisition and construction areas, tunnel boring machine (TBM) launch sites; stations; power substations; parking facilities; and MSF sites. Where new above-grade elements, such as the overhead contact system or elevated structures, are proposed in landscapes identified as significant to tribal representatives through consultation, the Tribal Cultural RSA includes a buffer adjoining the alignment within a reasonable viewshed of the new construction. The buffer is included because the introduction of new infrastructure would have the potential to cause new visual, audible, or atmospheric intrusions on the setting of adjacent TCRs.

The Tribal Cultural RSA for each alternative is shown on Figure 3.16-1 through Figure 3.16-5. The Tribal Cultural RSA is documented on maps provided in the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a).

Figure 3.16-1. Alternative 1 Tribal Cultural Resources Resource Study Area

Source: HTA, 2024

Figure 3.16-2. Alternative 3 Tribal Cultural Resources Resource Study Area

Source: HTA, 2024

Figure 3.16-3. Alternative 4 Tribal Cultural Resources Resource Study Area

Source: HTA, 2024

Figure 3.16-4. Alternative 5 Tribal Cultural Resources Resource Study Area

Source: HTA, 2024

Figure 3.16-5. Alternative 6 Tribal Cultural Resources Resource Study Area

Source: HTA, 2024

As discussed in Section 3.16.1 Regulatory and Policy Framework, for AB 52, TCRs are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes that are listed in or eligible for listing in the CRHR, listed in local historic registers, or determined by a lead agency to be significant resources.

AB 52 Consultation

On November 30, 2021, the Los Angeles County Metropolitan Transportation Authority (Metro) initiated consultation efforts with 14 Native American representatives who were included on the NAHC consultation list. Representatives from the following entities were contacted:

- Barbareno/Ventureno Band of Mission Indians
- Chumash Council of Bakersfield
- Coastal Band of the Chumash Nation
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Northern Chumash Tribal Council
- San Luis Obispo County Chumash Council
- Santa Rosa Band of Cahuilla Indians
- Santa Ynez Band of Chumash Indians
- Soboba Band of Luiseño Indians

Tribal representatives were informed of Metro's intent to prepare a Draft Environmental Impact Report (DEIR) for the Project. Pursuant to PRC Section 21080.3.1(d), tribal representatives were informed of Metro's intent to prepare a DEIR for the Project. The correspondence, which was sent to representatives by either mail or email, included a brief project description, maps showing the location of the project alternatives, and contact information for Metro's designated point of contact.

After receiving the correspondence, two tribes – the Fernandeño Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians-Kizh Nation – requested consultation. Consultation calls were conducted in January 2022 with both tribes. During a meeting in May 2023 held as part of the federal Planning and Environmental Linkages process for the Project, the Gabrielino Tongva Indians of California Tribal Council requested to participate in the Project's AB 52 consultation. On June 9, 2023, Metro distributed letters via email to the three consulting tribes in an effort to continue consultation. The letters requested additional documentation and information the tribes indicated they wished to provide for the cultural resources assessments.

Documents pertaining to AB 52 consultation efforts are provided in the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a).

Archival Research

Archaeologists who meet the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) and are familiar with the Study Area resources and research considerations conducted the archival research for this analysis. Archival research was used in combination with information provided through AB 52 consultation to identify potential TCRs within the Project Study Area.

South Central Coastal Information Center Search

A records search for the Project Study Area was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System, California State University, Fullerton in February 2022 and March 2023. The SCCIC, an affiliate of the California Office of Historic Preservation, is the official state repository of cultural resources records and studies for Los Angeles County. The search included a review of all recorded prehistoric archaeological sites within a 0.5-mile radius of the Archaeological RSAs for Alternatives 1 through 6 and a review of all recorded historic archaeological and architectural sites and cultural resource reports on file within a 500-foot radius of the Archaeological RSAs for Alternatives 1 through 6. In addition, California Points of Historical Interest, California Historical Landmarks, CRHR, NRHP, California State Historic Resources Inventory, and local registers were reviewed. Historical U.S. Geological Survey (USGS) topographic quadrangle maps were also reviewed. Information pertaining to the results of the SCCIC search is included in the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a).

Native American Heritage Commission Sacred Lands File Search

In addition to the SCCIC records search, the NAHC conducted an SLF search on November 9, 2021, to identify TCRs that might be affected by the Project, as required by CEQA as amended by AB 52. Documents pertaining to the SLF search are included in the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a).

The NAHC identified 14 Native American representatives for AB 52 consultation efforts and recommended contacting the Fernandeño Tataviam Band of Mission Indians and the Gabrielino Tongva Indians of California Tribal Council for additional information. The AB 52 tribal consultation list was provided to Metro on November 10, 2021, and includes the 14 entities previously listed in Section 3.16.2.1, under the AB 52 Consultation subheading.

Ethnographic Research

A review of primary and secondary ethnographic literature and historic maps was conducted to identify possible locations for TCRs that may not be captured in the SCCIC records search. This review included identifying natural resources and landscape features that may be of interest to tribal communities, historic roads and trails, village locations, and other traditional place names. Sources consulted include General Land Office survey maps, USGS historical topographic maps, Huntington Library Digital Archives, the Library of Congress, and University of California Libraries Online Archive of California. Results of this review are summarized in Section 3.16.4.1.

Field Survey

A targeted field survey was conducted April 10-12, 2023, and April 17-19, 2023, by qualified architectural historians and archaeologists (36 CFR Part 61) to identify cultural resources in the RSA.

During the archaeological field survey, Project archaeologists examined the areas where temporary or permanent ground disturbance may occur within the project alternatives for evidence of cultural material that may constitute a TCR. In addition, archaeologists visited locations adjacent to the project alignments identified as significant to tribal representatives. The goal of these visits was to determine if the project alternatives have potential to result in indirect impact to known TCRs or landscapes of significance to consulting tribes. For these site visits, photographs were taken and potential for visual, audible, and atmospheric impacts to the setting of the TCR was assessed.

3.16.2.2 Impact Analysis

Section 15064.5 of the CEQA Guidelines provides standards for determining what constitutes a "substantial adverse change" to a historical resource. This standard is used to assess whether a significant impact on a TCR would occur.

Operational Impacts

Operational and maintenance activities from new rail/monorail traffic would introduce vibration, noise, and visual intrusions that could cause a substantial adverse change in the significance of tribal cultural resources. Depending on the nature and extent of vibration impacts for each project alternative, as identified through the noise and vibration analysis provided in Section 3.11, physical damage to resources due to vibration may constitute a significant impact under CEQA. Visual, audible, and atmospheric impacts from project operation have potential to cause a significant impact under CEQA if project operation changes the resource's immediate surrounding such that the significance of the resource would be materially impaired. The significance of a resource is materially impaired when a project demolishes or alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR, or that account for its inclusion in a local register of historical resources. The assessment of operational impacts considers the context and integrity of identified resources to determine if project operation would materially impair the significance of TCR.

Construction Impacts

Construction activities pose the greatest risk of physical demolition, destruction, relocation, or alteration of TCRs. Generally, the assessment of impacts to these resources involves review of the construction areas where temporary or permanent ground disturbance may occur and designs for each project alternative to determine if any known TCRs are within the alignments or subject to construction effects. The potential to encounter and impact unknown buried resources would be assessed based on tribal consultation, cultural resource records search results, archival research, and professional judgment.

3.16.2.3 CEQA Threshold of Significance

For the purposes of this DEIR, impacts are considered significant if the Project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 § 5020.1(k), or
  - 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.16.3 Project Measures

No project measures are recommended related to TCRs.

3.16.4 Existing Conditions

The geologic and recent historic context of the RSA are provided in the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a). The results of the archival research, including the California Historical Resources Information System records search, is presented in Chapter 3 of the DEIR. The following discussion presents the prehistoric and ethnographic context of the Project Study Area.

3.16.4.1 Project Study Area

Prehistoric Context

The prehistory of the Southern California coastal region is typically divided into Early, Middle, and Late Periods, with an initial Paleo-Indian period dating to the Late Pleistocene and Early Holocene (Wallace, 1955; Warren, 1968).

Paleo-Indian Period

The limited evidence of Paleo-Indian hunting technology observed in the California archaeological record and the more recent identification of early sites along the Pacific Coast of the U.S. suggests that the earliest people to colonize California likely arrived along the shores and settled into these rich coastal environments (Erlandson et al., 2007; Willis and Des Lauriers, 2011). In the Southern California coastal region, the earliest evidence of human occupation comes from a handful of sites where early tools and some human remains dating from 7,000 to around 13,000 years ago have been identified (Erlandson, 2012).

Among the Paleo-Indian sites in the region are the Arlington Spring and Daisy Cave sites, located on the Northern Channel Islands, which have produced human remains that are 12,000 years in age and artifacts dating to around 9,500 cal (i.e., calibrated) Before Present (BP). Other mainland coastal sites adjacent to the Northern Channel Islands have produced deposits that are around 8,000 and 7,000 years in age (Erlandson et al., 2007). In the Los Angeles region, the oldest component of the Malaga Cove site has been estimated at approximately 8,000 years old (Glassow et al., 2007). The first people to settle in what is now Southern California appear to have practiced a generalized hunting, gathering, and fishing subsistence strategy that relied heavily on fish and shellfish. The resources associated with this period are characterized by small sites and assemblages containing expedient stone tools, unifacial stone tools, leaf-shaped or stemmed bifaces and projectile points, crescents, bone fish gorges, and spire removed Olivella beads, with no evidence of milling implements (Erlandson et al., 2007; Glassow et al., 2007; Willis and Des Lauriers, 2011).

Early Period (8,000 Before Present to 3,000 Before Present)

Although people are known to have inhabited what is now Southern California beginning at least 13,000 years BP (Arnold et al., 2004), the first solid evidence of human occupation in the Los Angeles Basin dates to roughly 9,000 BP and is associated with a period known as the Early Period or the Millingstone Horizon (Wallace, 1955; Warren, 1968). Millingstone populations established permanent settlements that were 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 Period occupations are typically identified by the presence of handstones (manos) and millingstones (metates). Sites from this time period typically contain shell middens, large numbers of milling implements, crude core and cobble tools, flaked stone tools, distinctive cogged stone implements, and infrequent side-notched dart points (Fenenga, 1953). The focus at inland sites appears to be in plant food processing and hunting. Along the coast, populations invested in maritime food

gathering strategies, including close-shore and deep-sea fishing, as well as shellfish collection (Grenda, 1997).

Middle Period (2,550 Before Present to 800 Before Present)

Although many aspects of Millingstone culture persisted, by 3,000 BP, a number of socioeconomic changes occurred, as understood through changes in material culture (Erlandson, 1994; Wallace, 1955; Warren, 1968). These changes are associated with the period known as the Middle Period or Intermediate Horizon (Wallace, 1955). The mortar and pestle were introduced during this period, suggesting an increased reliance on hard plant foods such as acorns (Altschul and Grenda, 2002). Increasing population size coincides with intensified exploitation of terrestrial and marine resources (Erlandson, 1994). This was accomplished, in part, through the use of new technological innovations such as the circular shell fishhook on the coast, and, in inland areas, the use of the mortar and pestle to process an important new vegetal food staple, acorns, resulting in a more diverse hunting capability (Warren, 1968). A shift in settlement patterns from smaller to larger and more centralized habitations is understood by many researchers as an indicator of increasingly territorial and sedentary populations (Erlandson, 1994). During the Middle Period, specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended.

Late Period (800 Before Present to 400 Before Present)

The Late Prehistoric period, spanning from approximately 800 BP to the Spanish Mission era (AD 1769 to 1821), is the period associated with the florescence of contemporary Native American groups. The Late Period is notable for a dramatic increase in the number of habitation and food processing sites. These sites include more bone tools, numerous types of Olivella shell beads, circular fishhooks, and occasional pottery vessels (Miller, 1991). Between 800- and 200-years BP, small arrow-sized projectile points, of the Desert side-notched and Cottonwood triangular series, were adopted along what is now the Southern California coast (Altschul and Grenda, 2002). Following European contact, glass trade beads and metal items also appeared in the archaeological record. Burial practices shifted from interment to cremation in what is now the Los Angeles Basin and northern Orange County. However, at many coastal and most Channel Island sites, interment remained the common practice (Moratto, 1984).

Some researchers argue that the changes seen at the beginning of this period reflect the movement of Shoshonean speakers from the eastern deserts into the area that is now the Southern California coast. However, others suggest that the movement of desert-adapted Shoshonean speakers occurred as much as 2,000 years earlier (Bean and Smith, 1978; Sutton, 2009).

Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, and 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; Heizer, 1968 [1852]). 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 (Heizer, 1968 [1852]).

Ethnographic Context

At the time of European contact, much of the Project Study Area was occupied by Shoshonean-speaking Gabrieliño people, a name assigned by the Spanish to Indigenous people associated with Mission San Gabriel, which controlled from what is now the Los Angeles Basin and Orange County down to Aliso Creek (Kroeber, 1925). Descendant Gabrieliño communities and tribal entities have used many names to identify themselves through time. Following Spanish missionization, native people were often referred to by the mission with which they were affiliated (e.g., “Gabrieliño”) for an association with the Mission San Gabriel. Government agencies and other organizations continued to use the terms to identify tribal communities over time. During the American Indian Movement of the late 1960s and 1970s, many tribes worked to reclaim and make visible their ancestral names in history. Prominent indigenous identifiers adopted by Gabrieliño groups include “Tongva” and “Kizh,” which have roots in cultural history and more accurately reflect the values of tribal communities. The northern San Fernando Valley was the northernmost extent of the territory occupied by people whom the Spanish referred to as the Fernandeño, derived from nearby Mission San Fernando. The Fernandeño spoke one of four regional Uto-Aztecan dialects of Gabrieliño, a Cupan language in the Takic family, and were culturally identical to the Gabrieliño. The Tataviam and Chumash, of the Hokan Chumashan language family, lived to the north and west of this territory, respectively. Figure 3.16-6 provides ethnographic tribal boundaries for the Gabrieliño and their neighbors, and it is likely that the territorial boundaries between these linguistically distinct groups fluctuated in prehistoric times (Bean and Smith, 1978; Shipley, 1978).

Figure 3.16-6. Regional Ethnographic Tribal Boundaries

Source: HTA, 2024

Traditional Lifeways and Cultural Practices

Occupying what is now the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange Counties, the Gabrieliño 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 Gabrieliño 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 Gabrieliño villages, but as many as 100 may have existed prior to contact with Europeans (Bean and Smith, 1978; McCawley, 1996; Heizer, 1968 [1852]).

Early explorers reported Gabrieliño villages to have been most abundant near the Los Angeles River, in the area north of what is now downtown Los Angeles known as the Glendale Narrows, and those areas along the river's various outlets into the ocean. The Project Study Area extends from the San Fernando Valley, across the Santa Monica Mountains, and into the Los Angeles Basin, traversing inland valley, mountain, and coastal plain environments with unique settlement patterns and traditional uses by indigenous communities. With an expansive territory that encompassed resource-rich island, coastal, and inland environments, the Gabrieliño had developed a thriving society with intensive regional economic interactions by the time the Spanish arrived in California. 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 varied. These groups would maintain permanent territories that included primary villages with multiple seasonal settlements and temporary use sites for ritual practice, plant gathering, or hunting, among other activities. Settlement and subsistence strategies varied across environmental zones and ecotones that extended from islands and the coast to mountainous regions and inland valleys.

Generally, families would gather at the primary village, dispersing to smaller camps throughout the year to take advantage of seasonally available plant and animal resources. In the interior mountainous regions, small family units would head out in the spring and summer to gather roots, bulbs, and seeds, moving to oak groves in the fall to harvest acorns. On the inland plains, families would disperse in the winter to shellfish-gathering camps along the coast south of what is now San Pedro. Along the coast north of what is now San Pedro, winter months led villages to break up, with smaller groups heading to inland camps to take advantage of seasonally available resources while fishing was limited by rough seas (McCawley, 1996).

Most villages had a *yovaar*, which was a religious structure with an open courtyard and ritual structures surrounded by brush fencing, near the center of the camp. The houses belonging to elite members of society were placed near the *yovaar*, with homes for other members of the village located farther out. Sweat huts were located near streams or springs. Windbreaks, raised granaries, playing fields, and burial grounds were also common components of a village (McCawley, 1996).

Communities were regularly in contact with one another through a system of annual "ritual congregations" during which elites and non-elites forged social, political, and economic bonds. Religious and craft-based organizations and guilds were a major structuring element of Gabrieliño society as well.

Material culture, defined as the tools, clothing, adornments, and other objects manufactured and used by a group, was made with expert craftsmanship and artistry. Soapstone, bone, wood, and plant-based crafts were exchanged locally and regionally. Common objects found in the home might include cooking, gathering, and storage baskets; steatite comals (cooking slabs) and cooking pots; portable milling equipment; wooden cooking implements; shell spoons; toys and games; and pottery vessels. Bone saws

and awls, shell fishhooks, needles, awls, and stone knives and drills were also important implements in daily life. Wooden war clubs, self- and sinew-backed bows,[1] simple and compound arrows, and slings were used for hunting and fighting (Bean and Smith, 1978).

The Gabrieliño maintained sophisticated and deeply meaningful religious and ceremonial traditions that incorporated creation stories, puberty rituals, shamanism, taboos, burial rituals, and annual celebrations (Bean and Smith, 1978) that were often connected to specific locations on the landscape. Some Gabrieliño shamans participated in the elite Chumash religious and political group known as the *antap*. Additionally, the Gabrieliño religion associated with the creator-God Chengiichngech spread through much of Southern California and persisted through missionization (Bean and Smith, 1978).

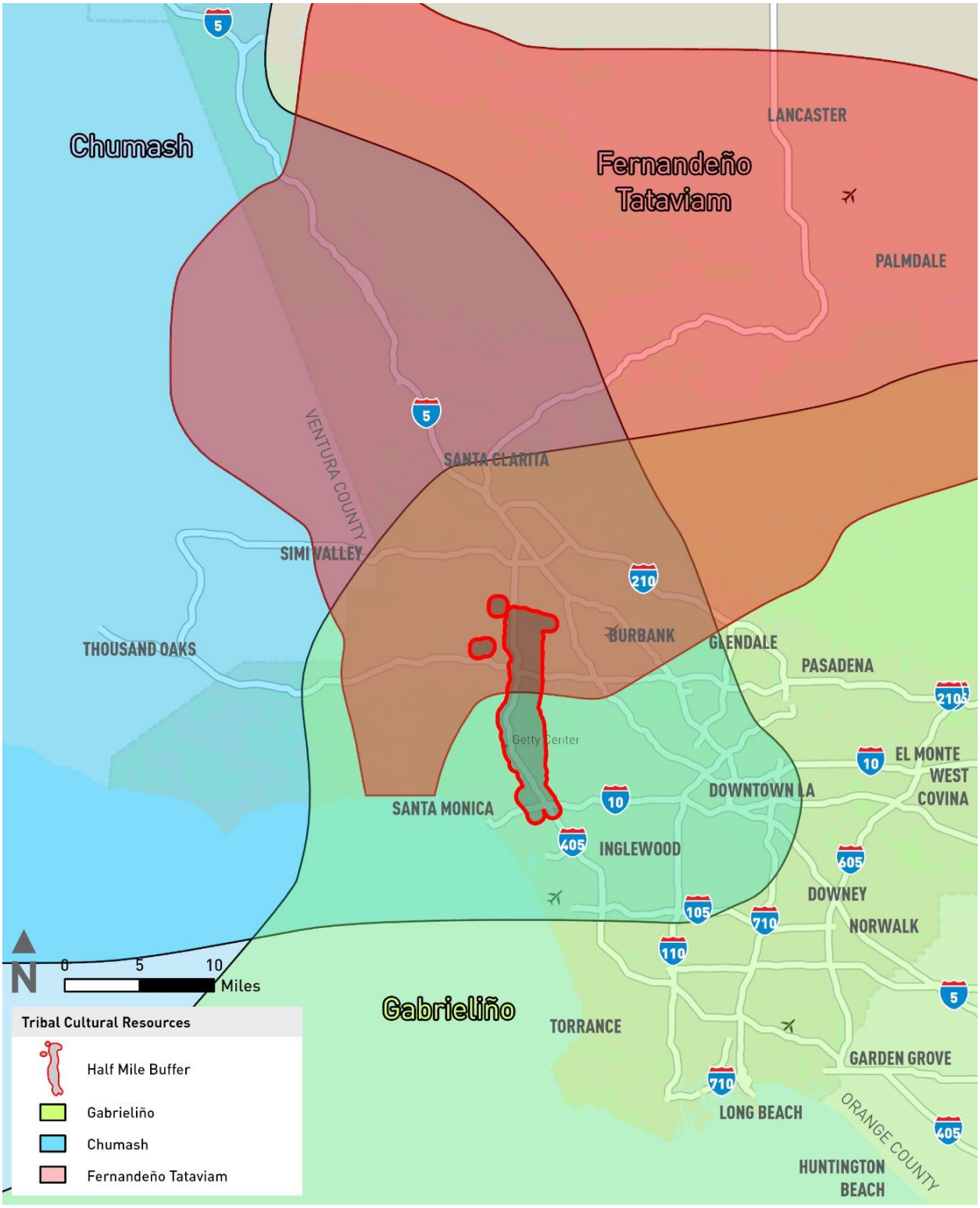
Communities After Colonization

The Portolá expedition of 1769 was likely the first time Europeans made direct contact with the people living in the vicinity of the Project Study Area. Portolá reached the San Gabriel Valley in early August 1769 and traveled west through a pass between two hills, where he encountered the Los Angeles River and camped on its east bank near the present-day North Broadway Bridge. Portolá traveled through the vicinity of the Project Study Area between August 3 and August 5 and camped near the present-day University High School in the City of Santa Monica (near the southern end of the Project Study Area) and Encino State Park (near the northern half of the Project Study Area). The Portolá expedition then passed through Sepulveda Canyon along the way (Bolton, 1927). Multiple villages were encountered as the expedition traveled through this region.

Missions were established in the years that followed the Portolá expedition, the fourth being the Mission San Gabriel Arcángel founded in 1771 near the present-day City of Montebello. More than 25 years later, in 1797, Mission San Fernando was established in what is today the northern San Fernando Valley. By the early 1800s, most of the Gabrieliño population had entered the mission system. The Gabrieliño who inhabited what is now Los Angeles County were under the jurisdiction of either Mission San Gabriel or Mission San Fernando. Following the establishment of the mission system and the coerced participation in new economic and social structures, Gabrieliño people and their neighbors engaged in active and passive forms of resistance to maintain connections to their families, language, and traditions (Castillo, 2023). While tribes in the region had a long history of interaction prior to colonization, the missions concentrated people from diverse cultures, including those of the Fernandeño, Gabrieliño, Chumash, Tataviam, and Kitanemuk lineages, in the San Fernando Valley and Los Angeles Basin. The relocation of people from their communities disrupted familiar practices, spurring tribal people to form new communities informed by traditional cultural practices (Champagne and Goldberg, 2021). Figure 3.16-7 depicts ethnographic boundaries of traditional tribal territories in the region as defined by current tribes. The boundaries overlap one another at their edges, indicating the region was traditionally utilized by multiple tribes and the Tribal Cultural RSA is of interest to several tribal communities. These boundaries were derived from multiple sources, including maps produced by contemporary tribal communities and the digital database maintained by Native Land Digital (Native Land Digital, 2023).

[1] A self-backed bow is a bow made from a single piece of wood.

Figure 3.16-7. Ethnographic Boundaries Recognized by Contemporary Tribal Communities



Source: HTA, 2024

In 1821, Mexico gained its independence, and by 1834 the authority of Alta California secularized the mission system. As a result, nearly all of the Gabrieliños relocated north of Los Angeles County, outside their former territorial land depicted on Figure 3.16-6. Alta California, a Spanish province and Mexican territory that included what is now the state of California among other lands, intended to distribute the mission lands to Native Americans who had lived at the missions as part of the secularization process. However, this effort was undermined by powerful landowners in the mid-1830s, leaving Native people to secure a life for themselves and their communities in other ways (Champagne and Goldberg, 2021). Gabrieliño and Fernandeño populations were particularly devastated by early Spanish colonization efforts, such that, by the late 1800s, very few tribal people remained in their native homeland. Some fled to refuges farther inland or to villages of neighboring tribes to the north or south, while others perished from disease and conflict with colonizing societies. However, some Gabrieliño, Fernandeño, Chumash, and Tataviam remained in the vicinity of the City of Los Angeles. Their numbers were supplemented by the numerous other Native Americans who flooded into the City of Los Angeles after secularization.

Toward the end of the Mexican period, a number of Native American workers' settlements were located around the City of Los Angeles. One such settlement, the Rancheria de los Poblanos, was located southeast of the corner of current-day Alameda Street and Commercial Street from 1836 to 1845, when it was razed by the City of Los Angeles. Another rancheria, the history of which is less well known, may have been located approximately 1 mile upslope from the Los Angeles Plaza (McCawley, 1996).

In 1843, 40 Native people from Mission San Fernando successfully petitioned the Mexican government for a grant to Ranchos Los Encinos, which consisted of about 7 square miles (over 4,000 acres). The petition included the condition that they could not sell it and must continue to work to support the mission (Champagne and Goldberg, 2021). Tiburcio Cayo, a descendant from the Chumash-speaking village of *Tapuu* in Simi Valley, petitioned for a grant to Rancho Los Encinos, where his wife's ancestral village of *Siutcanga* was located. Tiburcio's wife, Paula Cayo, had maternal ancestors from *Siutcabit*, the lineages based at *Siutcanga* on Rancho Encino. Tiburcio and his extended family raised crops and had 40 to 50 head of cattle around the village, which had fresh water and warm springs that had sustained a community at the location well before colonization.

Tiburcio Cayo died while trying to get the Mexican government to approve the grant; however, Pio Pico deeded the land to his sons on July 18, 1845 (Champagne and Goldberg, 2021). Early leaders of Rancho Encino included Roque, Ramon, and Francisco Papababa. By 1862, one of the heirs of Rancho Encino Indian leadership, a woman named Rita, remarried Fernando Ortega (Yaqui) following the death of her husband. Two of their four children survived into adulthood to have families of their own. Rudy Ortega Sr. is the great grandson of Rita. Also known as Chief Little Bear, Mr. Ortega led the Fernandeño Tataviam people starting in the 1940s (Champagne and Goldberg, 2021).

The descendant communities of the Gabrieliño, Fernandeño, and their neighbors continue to live throughout the region. The NAHC identified 14 tribes who currently claim ancestral ties to the region in the Project Study Area. These groups are active in revitalizing their heritage and passing the lessons of their culture on to future generations.

Villages and Placenames

The nearest village to the northern half of the of the RSA is *Siutcanga*, which was located on Rancho El Encino in Encino. The location of *Siutcanga* is thought to have been visited by the Portolá expedition on August 5, 1769, with journal entries noting that inhabitants offered the visitors seeds and blankets made of rush and that the community consisted of over 200 people (McCawley, 1996:38). In the mid-1980s, an

archaeological site was encountered just under 2 miles west of the RSA, near Rancho Los Encinos State Historic Park, which is interpreted to be the location of *Siutcanga* (McCawley, 1996). This village was occupied as early as 5,000 B.C. and includes a cemetery with both human and animal burials (McCawley, 1996:38). A review of historic maps for Los Angeles, CA (USGS, 1894) and Calabasas (USGS, 1903) indicates the location of the village is just west of a perennial drainage that flows into a confluence of drainages with the Los Angeles River, located a little over 0.5 mile north.

The village nearest to the southern half of the RSA is *Koruuvanga* (P-19-000382), located approximately 200 feet to the north of the Tribal Cultural RSA. *Koruuvanga*, a Gabrieliño village whose name means "we are in warmth," or "we are in the sun" (McCawley, 1996), is the location of an active spring where the Gabrieliño village was located, and which is now managed by the Gabrieliño-Tongva Springs Foundation (UCLA American Indian Studies Center, 2023). The 1769 Portolá expedition reportedly camped at this location, with Father Crespi remarking on the friendly nature of the people living at the village (Gabrielino-Tongva Springs Foundation, 2021; Bolton 1927). The lands on which the village was located were permitted to Don Francisco Sepulveda in 1828 and in 1839 the land became known as Rancho San Vicente y Santa Monica (Gabrielino-Tongva Springs Foundation, 2021). The springs on-site supplied water for the region, and the lands passed through multiple hands before being annexed by the City of Los Angeles in 1922. The property on which the village and springs were located was developed by the Los Angeles Board of Education starting in 1900. Throughout the contemporary use of the area surrounding the ethnographic village (*Koruuvanga*), artifacts of Native American origin have been found on site. The original 1969 archaeological site record for P-19-000382 notes that the site was thought to have contained a burial ground, with handwritten notes indicating confirmation in 1975. Additional material culture, including midden soils, shell fragments, ground stone implements, and flaked stone tools have been identified on the site in the course of monitoring construction activities in recent years.

While the RSA does not appear to be located within any historic villages or place names identified in the ethnographic record, the full extent and exact location of villages in the region are not currently well defined. The *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860* (Kirkman, 1937) depicts a variety of historical settlements, trails, and geographic locations. No rancho or village markers were observed on other historic maps that were reviewed, including General Land Office survey plat maps from the 1870s and 1880s.

Cultural Landscapes and Natural Resources

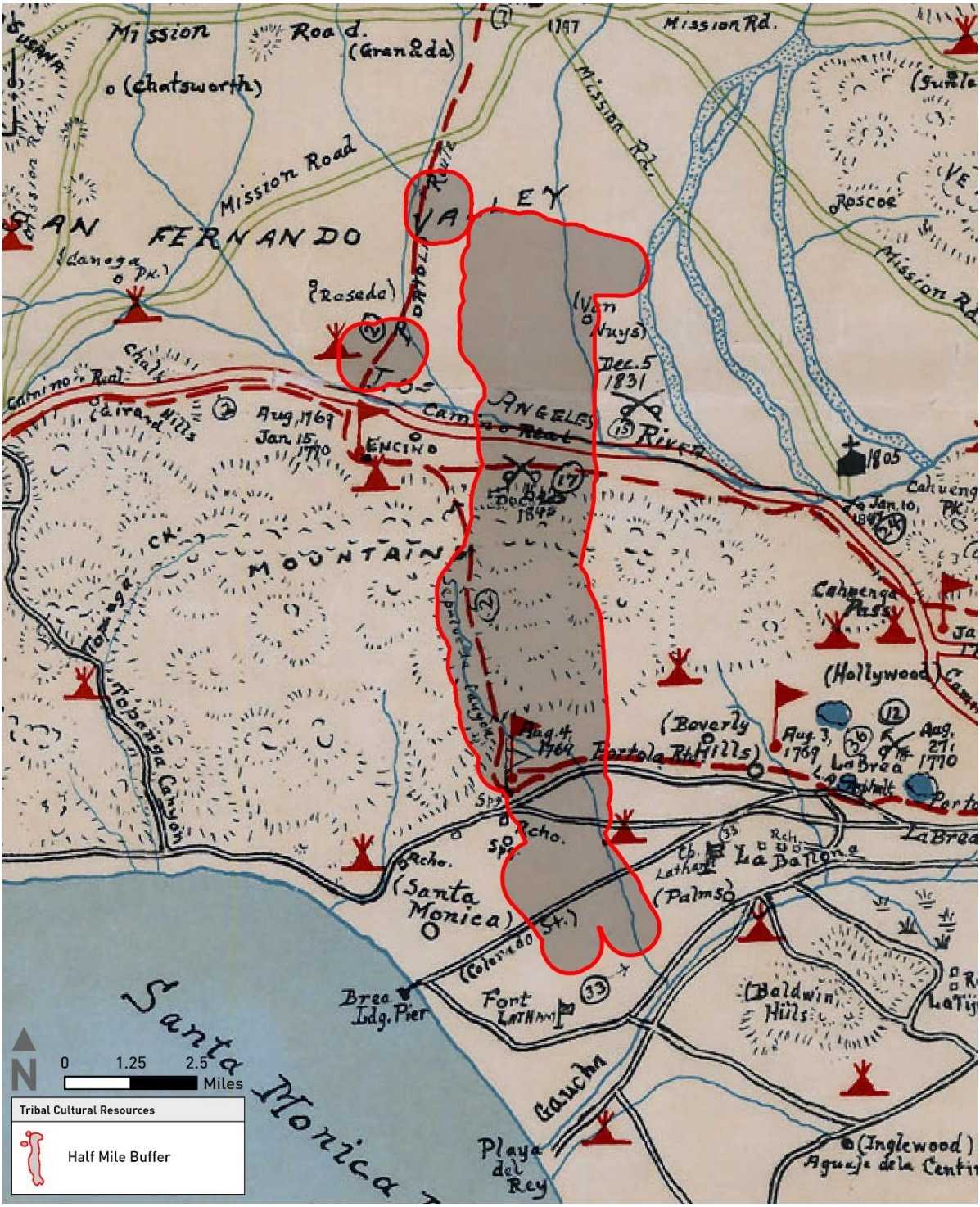
For the Gabrieliño and other Native American tribes with traditional ties to the Project Study Area, the landscape is imbued with cultural value that is informed by the places and the way people interact with their environment through time. As such, it is not only significant locations such as villages or ceremonial sites that have value, but also the routes people traveled to get from place to place, fresh water sources, traditional plant gathering areas, and landscape features such as springs, stone outcrops, or caves that might be associated with sacred stories (Fortier, 2008). The knowledge regarding the location and nature of some of these important TCRs is often reserved for tribal members, and the details may not be appropriate for public access. The following discussion addresses aspects of the ethnographic cultural landscape in the RSA as identified through archival research and informed by input from tribal representatives.

Several trails commonly used by the Gabrieliño and their neighbors, the Chumash, Tataviam, and Serrano, have been documented around San Fernando Valley and the Los Angeles Basin. These routes likely served as the foundation of roads, highways, and railroads that developed over time after the colonization of the region by the Spanish (Davis, 1961). A map of trails identified in ethnographic

literature depicts the Portolá expedition route in proximity to the Project Study Area, and the El Camino Viejo in the City of Los Angeles east of the RSA (Davis, 1961). The *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860* CE-1937 CE (Kirkman, 1937) (Figure 3.16-8) places the estimated route of the Portolá expedition crossing the Project Study Area in several locations, including along the northern and southern bases of the Santa Monica Mountains and along Sepulveda Canyon, traversing the mountain range. Portolá expedition member Fray Juan Crespi discussed the route they took through Sepulveda Pass in his journal entry for August 5, 1769, stating:

> *"This day we set out about two in the afternoon, going north…where we saw that there was a pass in the mountains. We entered it by a canyon formed by steep hills on both sides, but at the end of it they were more accessible and permitted us to take the slope and ascend, though with difficulty to the top, when we saw a very pleasant and spacious valley" (Bolton, 1927).*

Figure 3.16-8. Tribal Cultural Resources Resource Study Area Depicted on Los Angeles County Map, A.D. 1860



Source: HTA, 2024

Note: Tribal Cultural RSA is within the Cultural Resources Study Area on *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, A.D. 1860* (Kirkman, 1937)

A network of roads is also depicted across the region on the Kirkman-Harriman map, several of which bisect the RSA, including the Camino Real in the vicinity of the Los Angeles River. The south end of the Project Study Area is transected by routes marked as Old Roads, which include ancient trails and roads established prior to 1890. The map scale is fairly large at 1:200,000 and is based on historical maps and accounts. For this reason, the exact locations of these historic-period travel routes are difficult to verify. General Land Office plat maps from the late 1800s for Townships 1 North and 1 South, Range 15 West depict several road and trail segments in the vicinity of the RSA (Bureau of Land Management, 2006). General Land Office plat maps coinciding with the Tribal Cultural RSA predominantly cover rancho holdings, such as Ex Mission de San Fernando, Rancho El Encino, and Rancho San Vicente y Santa Monica, and provide limited details regarding landforms, travel routes, households, and natural features. No Native American trails or travel routes have been formally recorded within the Project Study Area.

Large portions of the Project Study Area have been subject to decades of development, and little remains of the flora or fauna endemic to the regions north and south of the Santa Monica Mountains. Within the Santa Monica Mountain range, proposed Project Study Area alignments with near-surface components are predominantly along previously developed corridors, though the surrounding vicinity exhibits a less developed natural setting that is representative of the past environment. Historically, there were likely patches of culturally important plant resources across the Project Study Area, but few remain undisturbed to indicate what type of gathering or processing activities may have been undertaken. Plants known to be used by Gabrieliño for food, medicine, and fiber technology material include needlegrass (*Nassella* spp.), bluegrass (*Poa secunda* subsp.), deergrass (*Muhlenbergia rigens*), adobe-lily (*Fritillaria pluriflora*), white broadiaea (*Triteleia hyacinthina*), clovers (*Trifolium* spp.), fiddleneck (*Amsinckia menziesii* subsp.), buckbrush (*Ceanothus cuneatus*), nude buckwheat (*Eriogonum fasciculatum*), scrub oak (*Quercus dumosa*), and mountain mahogany (*Cercocarpus betuloides*) (Fortier, 2008). In addition to these resources providing essential nutrients, medicine, and production materials, Fernandeño tradition holds that ancestors may come back to the world after death as plants or animals and that eating of acorns, for example, was an act of communing with ancestors (Champagne and Goldberg, 2021).

The 1894 *Los Angeles, California*, USGS 15-minute quadrangle depicts what the RSA looked like prior to significant urban development. The map presents a vast natural landscape with limited structures dotting the valleys and a few roads and railroad ROWs transecting the landscape. Freshwater marshes, streams, rivers, and springs are present across the area and the mountains exhibit roads going up the canyons on the south side of the Santa Monica Mountains, with only the Cahuenga pass connecting the San Fernando Valley to the Los Angeles Basin. The 1894 map shows that the northeast end of the Project Study Area is adjacent to the expansive north-south oriented Pacoima Wash. The Tribal Cultural RSA also intersects the northwest-southeast oriented Los Angeles River just north of the Santa Monica Mountains. The village of *Koruuvanga* (site number P-19-000382) was historically situated between two ephemeral drainages at the southern base of a Santa Monica Mountains alluvial fan, at the south end of the Project Study Area. The map depicts several springs on either side of the site and a single unidentified structure in the middle of the current site boundary for P-19-000382. These springs are still in existence today. Several other unnamed drainages marked with water on the 1894 map are depicted flowing out of the canyons to the south, crossing portions of the Project Study Area.

The Tataviam and neighboring tribes maintained intimate knowledge of flooding and drainage patterns associated with the Los Angeles River and other waterways (Champagne and Goldberg, 2021). These riparian environments would have provided ideal locations for the acquisition of a variety of resources.

Though many of the water courses have been eradicated or channelized, historically they would have provided sources of fresh water that create ideal conditions for certain plant resources and local fauna. Riparian plants were used for food; medicinal and ritual practices; construction materials; traditional structures; and fibers for baskets, cordage, and netting (McCawley, 1996). Habitation sites and activity areas were also commonly established near reliable sources of fresh water. Sites P-19-000382 and P-19-004669, identified within the SCCIC records search as containing Native American cultural material, represent such uses.

Of the several waterways that transect the Tribal Cultural RSA, the Los Angeles River has been identified to be of particular importance to historical and contemporary indigenous communities in the region. The Los Angeles River runs approximately 51 miles from the Simi Hills and Santa Susana Mountains, terminating at San Pedro Bay. The river is known as *Wanüt* or *Orit* by the Tataviam, while the Gabrieliño refer to the river as *Paayme Paxaayt*, which translates to "west river," or *wenot*, which means "river" (LA County, 2024; Lozano, 2018). Gabrieleño tradition holds that therapeutic waters intended to help heal the body were once present in the Los Angeles River, placed there by the creator (Lozano, 2018). Representatives of the Gabrieleño Band of Mission Indians – Kizh Nation have indicated that when people would pass away along trails such as the one historically mapped along the Los Angeles River (Longcore and Ethington, 2023), they would be buried where they died (Lozano, 2018). Tribal communities continue to use the Los Angeles River today for a variety of traditions, including harvesting culturally important plants like tule that are used to produce basketry and other fiber objects (Lozano, 2018). The presence of the Los Angeles River and other washes and drainages in the Project Study Area indicate the potential for encountering TCRs during construction.

While no stone or mineral deposits used by Native American communities have been documented within the Project Study Area, the La Brea Tar Pits are located approximately 4 miles east of the Project Study Area and constitute a significant mineral deposit utilized by tribes through time. The tar pits were an important source of ashphaltum used by Native people to waterproof baskets and boats, among other things. The use of this source by the Gabrieliño people was noted by the Portolá expedition. The remains of a woman dating to at least 9,000 years ago have also been identified within one of the tar pits, attesting to the antiquity of their importance (Fuller et al., 2016).

Native American Heritage Commission Sacred Lands File Search and AB 52 Consultation

Three tribes, the Gabrieleño Band of Mission Indians – Kizh Nation, the Fernandeño Tataviam Band of Mission Indians, and the Gabrielino-Tongva Indian Tribe, requested to participate in the AB 52 consultation for the Project.

A consultation meeting was held on January 13, 2022, with Jairo Avila, Tribal Historic and Cultural Preservation Officer of the Fernandeño Tataviam Band of Mission Indians; Peter Carter of Metro; and Jaime Guzman and Jennifer Redmond of HTA Partners (HTA).

Another consultation meeting was held on January 20, 2023, with Chairperson Andrew Salas and Matt Tautimes of the Kizh Nation; Peter Carter, Jacqueline Su, and Cameron Palm of Metro; and Jaime Guzman and Alec Stevenson of HTA.

On May 16, 2023, a meeting was held with Christina Conoley of the Gabrielino-Tongva Indian Tribe; Peter Carter and Cameron Palm of Metro; Federal Transit Administration representatives; and Sam Silverman, Jaime Guzman, and Allison Hill of HTA to discuss the Planning and Environmental Linkages process for the Project. At the meeting, Ms. Conoley confirmed the tribe would like to participate in AB 52 consultation.

As a result of these meetings and continuing AB 52 consultation, tribal representatives indicated that the Tribal Cultural RSA is sensitive for TCRs. Representatives from each tribe will provide information on areas that are of concern for the tribe and indicated they will be coordinating with Metro to provide further information. Two of the tribes, the Fernandeño Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians – Kizh Nation, requested that the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* (Metro, 2025a) include a comprehensive discussion of ethnographic information in the assessment of TCRs. At this time, consultation is ongoing, and additional comments and feedback may be received.

3.16.4.2 Alternative 1 Resource Study Area

The SCCIC records search, NAHC SLF search, additional archival research, AB 52 consultation efforts, and pedestrian survey did not identify any formally documented TCR listed in or eligible for listing in the CRHR or a local register of historical resources within the Alternative 1 Tribal Cultural RSA. However, during AB 52 consultation, representatives from multiple tribes indicated the importance of the Tribal Cultural RSA landscape to their cultural heritage. Two landscape features, the Sepulveda Pass and the Los Angeles River, have been identified in the Tribal Cultural RSA for Alternative 1 as significant places to local Native American tribes. While these two features are not formally documented as TCRs, for the purpose of this study they are being treated as culturally sensitive places in a manner similar to TCRs. Additional consultation with tribes under AB 52 is necessary to determine if these two features would be formally designated as TCRs.

Tribal Cultural Resources Sensitivity

While no TCRs have been formally recorded in the Tribal Cultural RSA, the study did identify ethnohistoric villages, burials, important prehistoric travel routes, and natural resource areas nearby. In addition, the NAHC SLF search confirmed that the region contains Native American cultural resources, Traditional Cultural Properties, and/or TCRs. Therefore, it is possible that unknown TCRs may be buried within the Alternative 1 Tribal Cultural RSA.

No TCRs were observed within the RSA during the cultural field survey; however, the majority of the Project Study Area is paved, and exposed surfaces available for inspection consisted primarily of landscape features, which are often small and contain heavily disturbed soils or imported fill.

No documented villages have been recorded within the Alternative 1 Tribal Cultural RSA; however, the village of *Koruuvanga* (P-19-000382) is located approximately 0.5 mile west of the southern end of the Alternative 1 Tribal Cultural RSA, and the village of *Siutcanga* is located approximately 2 miles west of the northern end of the Alternative 1 Tribal Cultural RSA. Both villages were visited by the Portolá expedition in August of 1769, contain burial grounds, retain an archaeological footprint, and continue to be significant places to tribes of the greater Los Angeles area. Archaeological investigations and construction monitoring in the vicinity of these locations have encountered burials and material culture consistent with a long-term habitation site.

Villages operated as the primary settlement within a lineage or clan's territory, and the landscape surrounding the villages was used for the management and gathering of important plant resources, hunting, collecting useful natural resources such as asphalt or stone material for household implements, and traveling between smaller camps and neighboring villages throughout the year. For this reason, there is increased potential to encounter other TCRs in the vicinity of known village sites.

No formally recorded indigenous travel routes have been documented within the Alternative 1 Tribal Cultural RSA. A review of ethnographic literature, historic maps, contemporary research on the

indigenous landscape, and comments provided by tribal representatives indicates that the Sepulveda Pass constitutes an important travel corridor. AB 52 consultation indicated that the pass may represent a significant landscape to tribes who have traditional knowledge of, and cultural connections to, the prominent corridor. The pass has been used for thousands of years to support exchange networks and travel, and it holds religious significance. Tribal representatives indicated the entire Tribal Cultural RSA corridor is in a landscape they consider to be a TCR. For a cultural resource, including a cultural landscape, to be treated as a TCR, it must have a defined geographic area and meet the criteria of the CRHR. The portion of the Tribal Cultural RSA in the Sepulveda Pass can be geographically defined by the viewshed of the canyon between ridges that bound the pass. The Santa Monica Mountains, in which the Sepulveda Pass is located, are listed as a scenic vista and scenic resource in the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001) further supporting the value of this landscape. Although the Pass does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate this feature as a TCR. Out of an abundance of caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project.

The Portolá expedition traversed the canyon in early August 1769. From the springs, they camped near the village of *Koruuvanga*, and then headed north, where they encountered the people of Siutcanga. The 1937 Kirkman-Harriman pictorial map of Los Angeles (Kirkman, 1937) also depicts several old or "ancient" roads intersecting the southern end of the Alternative 1 Tribal Cultural RSA, as well as the Camino Real crossing the RSA north of the Santa Monica Mountains. The exact location of these routes is difficult to confirm, but the routes likely followed existing trails and travel routes developed and used by the Gabrieliño and their neighbors. These routes were later developed into roads and highways that are in use today. Though significant development has occurred throughout the Sepulveda Pass, the corridor retains a similar footprint and comparable viewshed to the traditional period of use.

The Alternative 1 Tribal Cultural RSA is near several water courses that are important to Gabrieliño tribes. In the northern portion of Alternative 1, the Tribal Cultural RSA is intersected by the Los Angeles River just north of the Santa Monica Mountains in an area just east of where a confluence of drainages meets the river. To the east of the Tribal Cultural RSA, this area is now referred to as the Sepulveda Basin, and multiple prehistoric archaeological sites have been documented in the vicinity. The Sepulveda Pass also historically has had water running through it. At the south end of Alternative 1, several springs are mapped within 0.5 mile of the Tribal Cultural RSA. These riparian environments would have provided ideal locations for the acquisition of a variety of resources, and Native people would likely have spent time in these areas. Though many of the water courses have been eradicated or channelized, historically they would have provided sources of fresh water that created ideal conditions for certain plant resources and local fauna. Habitation sites and activity areas were also commonly established near reliable sources of fresh water.

The literature review, archival research, and tribal consultation identified the Los Angeles River as a landscape feature to be treated comparably to a TCR. The river has a placename in local tribal dialects, is mentioned in Gabrieleño history and lore, and is still used in contemporary tribal communities for ceremonial and cultural traditions (LA County, 2024; Lozano, 2018). A review of historic maps and the history of the Los Angeles River development indicates that, while the portion of the river within the Alternative 1 Tribal Cultural RSA was channelized between 1948 and 1952, it continues to follow a route closely resembling the river's historic footprint. Although the Los Angeles River does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate this feature as a TCR. Out of an abundance of

caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project.

Archival research indicates that most of the archaeological deposits recorded within a 0.5-mile radius of the Tribal Cultural RSA were encountered below ground surface during construction activities. Site records for archaeological resources identified at the SCCIC indicate there is potential for construction activities related to Alternative 1 to encounter TCRs below ground surface underlying existing developments.

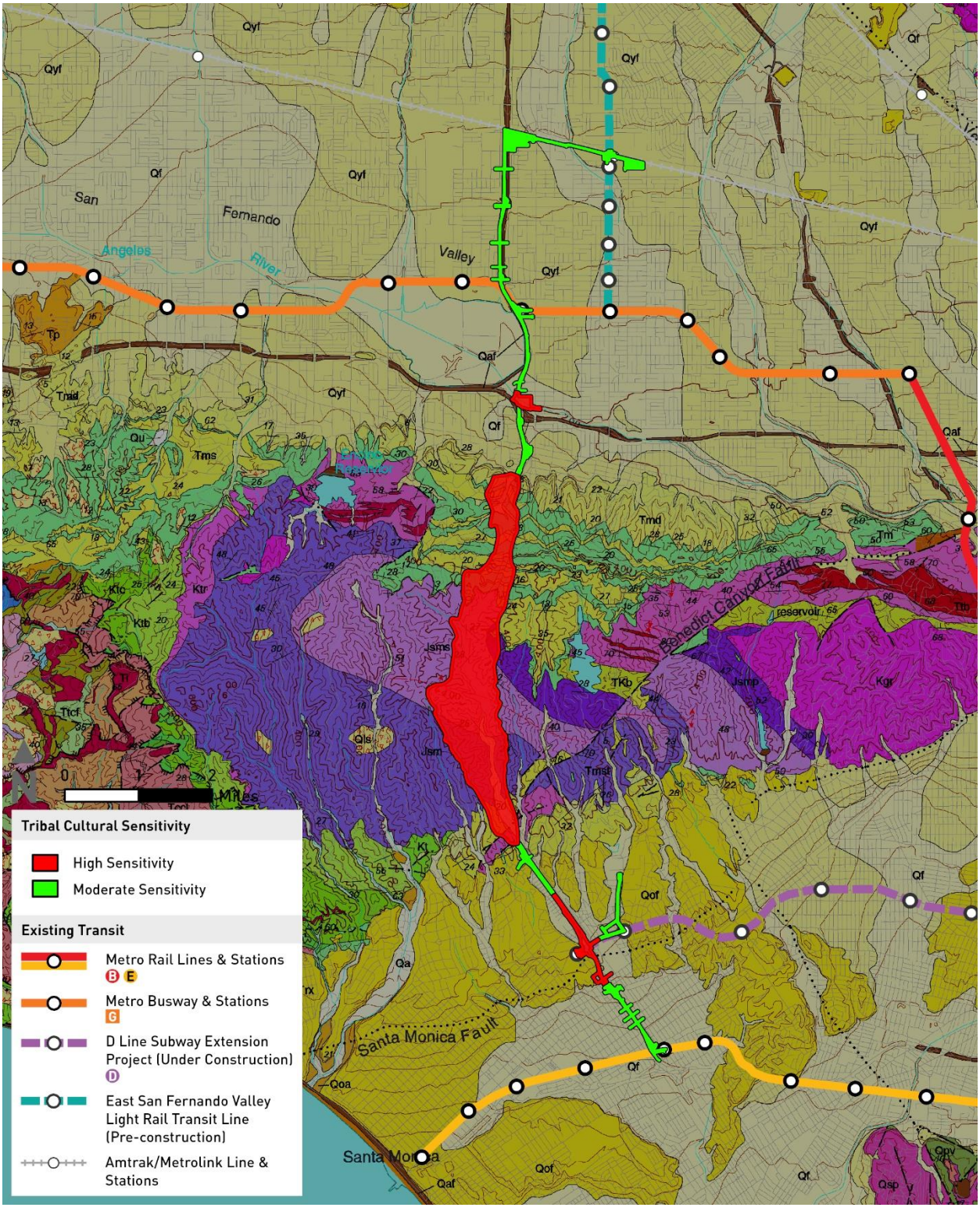
Two resources with Native American cultural material, P-19-000382 and P-19-004669, were recorded between approximately 0.5 mile and 1.25 miles away from the Archaeological RSA and are on file at the SCCIC. Additionally, a 2018 archaeological sensitivity analysis of the West Los Angeles Veterans Affairs (VA) campus suggests a third site of Native American origin may be present in the vicinity (Onken et al., 2018). The sensitivity model developed by Onken and others in 2018 indicated that approximately 17 percent of the VA campus exhibits Holocene-age soils that have increased potential for buried prehistoric archaeological deposits. Sensitivity ranking also took into account proximity to water sources and previously recorded resources. Full-time or spot-check archaeological monitoring or buried site testing was recommended for all areas except those identified as having very low sensitivity (Onken et al., 2018).

Most of the Tribal Cultural RSA north and south of the Santa Monica Mountains is in an alluvial depositional environment. Geologic mapping indicates that most of the Tribal Cultural RSA north and south of the Santa Monica Mountains is situated on Late Holocene to Pleistocene-aged alluvial fan deposits. The young age of the Holocene soils indicates that the sediments on which they formed were deposited in the last 5,000 years and, therefore, have a moderate potential for burial of older archaeological deposits. Generally, the younger a surficial alluvial landform is, the higher its potential for preservation of buried archaeological deposits. In addition, it has been demonstrated that archaeological sites are not distributed randomly across the landscape, but tend to correlate with certain environmental factors, including slope (flatter being more positively correlated) and distance to water and other resources.

The tribal cultural sensitivity of the Alternative 1 Tribal Cultural RSA is considered to range from moderate to high (Figure 3.16-9). The degree and depth of previous ground disturbance across the Tribal Cultural RSA is not known, but most of the RSA has been subject to prior construction and development. While the exact depth and degree of previous subsurface ground disturbance within the RSA is not known, grading for roads, rails, and parking lots, and previous construction activities for utilities and building foundations found across the Project Study Area are likely to have impacted approximately 5 feet below ground surface. Figure 3.16-9 depicts the estimated TCR sensitivity of the proposed Alternative 1 alignment based on current understanding of project components and should be revised as new information from tribal consultation and construction plans are received. Areas with low potential for archaeological resources include older geologic deposits (such as where project components would be constructed at great depth or where near-surface project components would be constructed in areas with older surficial deposits) and areas with very high levels of well-documented, previous subsurface ground disturbance. Areas with moderate potential to encounter archaeological resources include portions of the Tribal Cultural RSA in Holocene and late Pleistocene age soils near historic waterways, areas with limited previous ground disturbance, and areas near previously recorded archaeological resources or TCRs in or near the Tribal Cultural RSA.

It should be noted that archaeologists define sensitivity for archaeological resources as a potential for a location to contain intact deposits that can provide information of scientific value. TCRs, which may include archaeological deposits, do not necessarily require the same level of preservation, and tribal representatives may be more concerned with identifying and protecting any and all cultural material associated with ancestral use of an area, regardless of scientific value. Project components near sites with prehistoric components, such as P-19-000382 and P-19-004669, as well as areas in the Sepulveda Pass, the Los Angeles River, and on the West Los Angeles VA campus that have evidence of prehistoric use (Onken et al., 2018), contribute to the sensitivity of at-grade and mass excavation locations in the vicinity of the resources. The portion of the aerial alignment within the Sepulveda Pass and adjacent to the Los Angeles River is considered to have high sensitivity for TCRs.

Figure 3.16-9. Alternative 1: Tribal Cultural Sensitivity



Source: HTA, 2024

3.16.4.3 Alternative 3 Resource Study Area

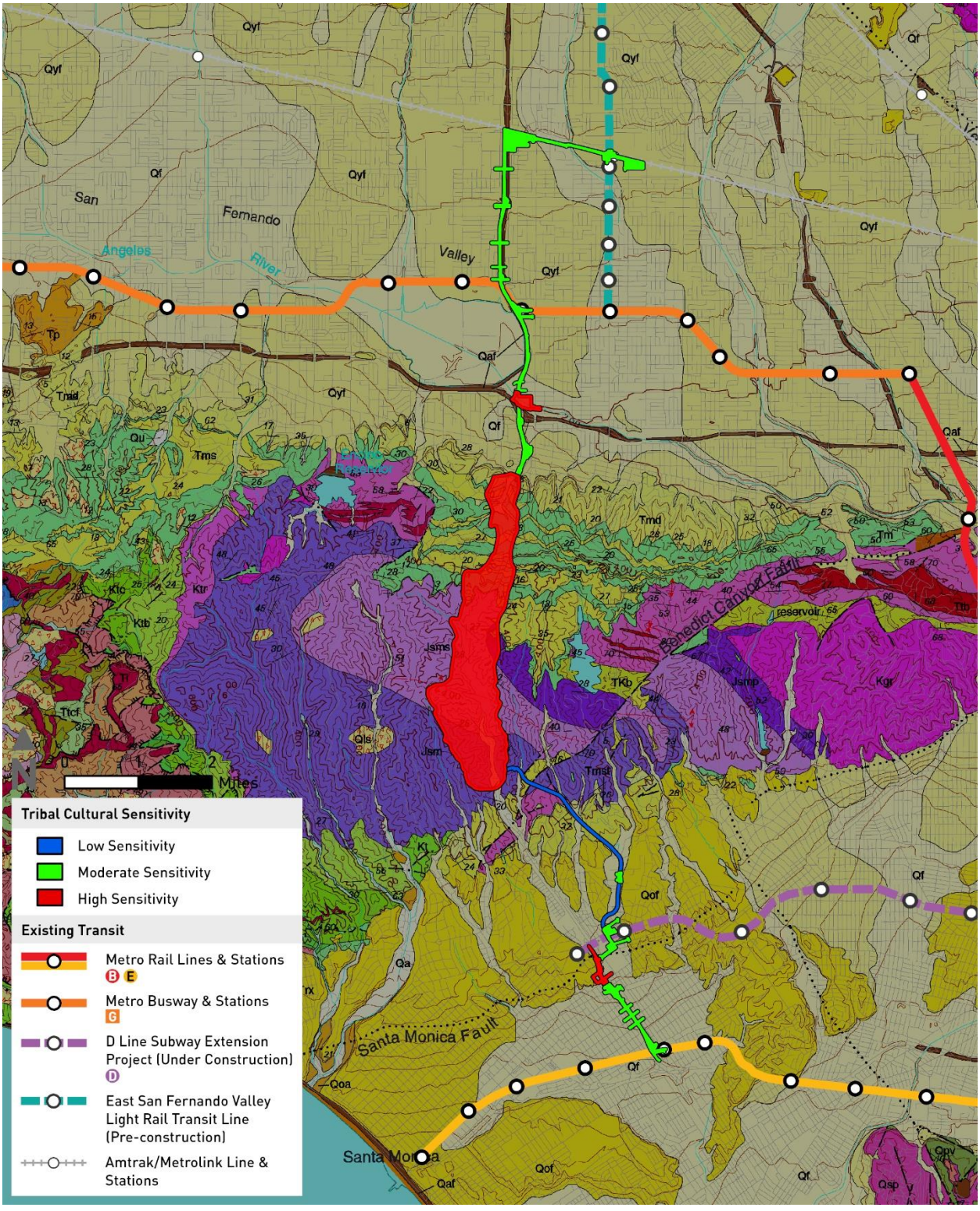
As described for Alternative 1, no TCRs have been formally recorded in the Alternative 3 Tribal Cultural RSA and the same recorded village and prehistoric resources were identified in and near the RSA. The following discussion addresses the results of the NAHC SLF search, ongoing AB 52 consultation, and discusses TCRs in the vicinity of the RSA and the potential to encounter previously unidentified TCRs within the RSA during construction.

Tribal Cultural Resources Sensitivity

As described for Alternative 1, no TCRs have been formally recorded in the Alternative 3 Tribal Cultural RSA and the same recorded village and prehistoric resources were identified in and near the RSA.

The tribal cultural sensitivity of the Alternative 3 RSA is considered to range from moderate to high (Figure 3.16-10). The degree and depth of previous ground disturbance across the RSA are not known, but a majority of the RSA has been subject to prior construction and development. While the exact depth and degree of previous subsurface ground disturbance for the RSA is not known, grading for roads, rails, and parking lots, and construction of utilities and building foundations found across the Project Study Area are likely to have impacted approximately 5 feet below ground surface.
Figure 3.16-10 depicts the estimated TCR sensitivity of the alignment based on current understanding of RSA components and should be revised as new information from tribal consultation and construction plans are received. The description of TCR sensitivity is the same as that provided for Alternative 1.

Figure 3.16-10. Alternative 3: Tribal Cultural Sensitivity



Source: HTA, 2024

3.16.4.4 Alternative 4 Resource Study Area

The SCCIC records search, NAHC SLF search, additional archival research, AB 52 consultation efforts, and pedestrian survey did not identify any formally documented TCR listed or eligible for listing in the CRHR, or in a local register of historical resources, within the Alternative 4 Tribal Cultural RSA. However, during AB 52 consultation, tribal representatives from multiple tribes indicated the importance of the RSA landscape to their cultural heritage. Two landscape features, the Sepulveda Pass and the Los Angeles River, have been identified in the Tribal Cultural RSA for Alternative 4 as significant places to local Native American tribes. While these locations are not formally documented as TCRs, for the purpose of this study these locations are being treated as culturally sensitive places in a manner similar to TCRs. Additional consultation with tribes under AB 52 is necessary to determine if these resources would be formally designated as TCRs.

The following discussion addresses the results of the NAHC SLF search and ongoing AB 52 consultation, as well as TCRs in the vicinity of the Tribal Cultural RSA and the potential to encounter previously unidentified TCRs during construction of Alternative 4.

Tribal Cultural Resources Sensitivity

While no TCRs have been formally recorded in the Tribal Cultural RSA, the study did identify ethnohistoric villages, burials, important prehistoric travel routes, and natural resource areas nearby. In addition, the NAHC SLF search confirmed that the region contains Native American cultural resources, Traditional Cultural Properties, and/or TCRs. Therefore, it is possible that unknown TCRs may be buried within the Alternative 4 Tribal Cultural RSA.

No TCRs were observed within the Tribal Cultural RSA during the cultural field survey. However, most of the Project Study Area is paved, and exposed surfaces available for inspection consisted primarily of landscape features, which are often small and contain heavily disturbed soils or imported fill.

No documented villages have been recorded within the Alternative 4 Tribal Cultural RSA. However, the village of *Koruuvanga* (P-19-000382) is located approximately 0.8 mile west of the southern end of the Alternative 4 Tribal Cultural RSA, and the village of *Siutcanga* is located approximately 2 miles west of the northern end of the Alternative 4 Tribal Cultural RSA. Both villages were visited by the Portolá expedition in August of 1769, contain burial grounds, retain an archaeological footprint, and continue to be significant places to tribes of the greater Los Angeles area. Archaeological investigations and construction monitoring in the vicinity of these locations have encountered burials and material culture consistent with a long-term habitation site.

Villages operated as the primary settlement within a lineage or clan's territory, and the landscape surrounding the villages was used for the management and gathering of important plant resources, hunting, collecting useful natural resources such as asphalt or stone material for household implements, and traveling between smaller camps and neighboring villages throughout the year. For this reason, there is increased potential to encounter other TCRs in the vicinity of known village sites.

No formally recorded indigenous travel routes have been documented within the Alternative 4 Tribal Cultural RSA. A review of ethnographic literature, historic maps, contemporary research on the indigenous landscape, and comments provided by tribal representatives indicates that the Sepulveda Pass constitutes an important travel corridor. AB 52 consultation indicated that the pass represents a significant landscape to tribes who have traditional knowledge of, and cultural connections to, the prominent corridor. The pass has been used for thousands of years to support exchange networks and

travel, and it holds religious significance. Tribal representatives indicated the entire RSA corridor is in a landscape they consider to be a TCR.

For a cultural resource, including a cultural landscape, to be treated as a TCR, it must have a defined geographic area and meet the criteria of the CRHR. The portion of the Tribal Cultural RSA in the Sepulveda Pass can be geographically defined by the viewshed of the canyon between ridges that bound the pass. The Santa Monica Mountains, in which the Sepulveda Pass is located, are listed as a scenic vista and scenic resource in the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001) further supporting the value of this landscape. Although the Pass does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate this feature as a TCR. Out of an abundance of caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project. The Portolá expedition traversed the canyon in early August 1769. from the springs, the expedition camped near the village of *Koruuvanga* and then headed north, where it encountered the people of *Siutcanga*. A portion of the Alternative 4 alignment appears to abut the northern extent of the Sepulveda Pass with part of the tunnel portion of the alignment running adjacent to the corridor. Additionally, aerial portions of Alternative 4 may be visible from the Sepulveda Pass viewshed. The 1937 Kirkman-Harriman pictorial map of the City of Los Angeles (Kirkman, 1937) also depicts several old or “ancient” roads intersecting the southern end of the Alternative 4 Tribal Cultural RSA, as well as the Camino Real, crossing the RSA north of the Santa Monica Mountains. An indigenous landscape study of the greater Los Angeles area (Longcore and Ethington, 2023) depicts several indigenous trails, including some maps that show a trail through the Sepulveda Pass. One major trail of note is one that runs parallel to the Los Angeles River, discussed as follows. The exact location of these routes is difficult to confirm but they likely follow existing trails and travel routes developed and used by the Gabrieliño and their neighbors. These routes were later developed into roads and highways that are in use today. Though significant development has occurred throughout the Sepulveda Pass, the corridor retains a similar footprint and comparable viewshed to the traditional period of use.

The Alternative 4 Tribal Cultural RSA is near several water courses that are important to Gabrieliño tribes. In the northern portion of Alternative 4, the RSA is intersected by the Los Angeles River just north of the Santa Monica Mountains in an area east of where a confluence of drainages meets the river. To the east of the Tribal Cultural RSA, the area is now referred to as the Sepulveda Basin, and multiple prehistoric archaeological sites have been documented in the vicinity. Sepulveda Canyon historically has had water running through it. At the south end of Alternative 4, several springs are mapped within a mile of the RSA. These riparian environments would have provided ideal locations for the acquisition of a variety of resources, and native people would have been likely to spend time in these areas. Though many of the water courses have been eradicated or channelized, historically they would have provided sources of fresh water that would create ideal conditions for certain plant resources and local fauna. Habitation sites and activity areas were also commonly established near reliable sources of fresh water.

The literature review, archival research, and tribal consultation identified the Los Angeles River as another landscape feature to be treated comparably to a TCR. The river has a placename in local tribal dialects, is mentioned in Gabrieleño history and lore, and is still used in contemporary tribal communities for ceremonial and cultural traditions (LA County, 2024; Lozano, 2018). A review of historic maps and history of the Los Angeles River development indicates that, while the portion of the river within the Alternative 4 RSA was channelized between 1948 and 1952, it continues to follow a route closely resembling the historic footprint. Although the Los Angeles River does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from

participating tribes is required to formally designate this feature as a TCR. Out of an abundance of caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project.

Archival research indicates that most archaeological deposits recorded within the RSA and a 0.5-mile radius were encountered below ground surface during construction activities. Site records for archaeological resources identified at the SCCIC indicate there is potential for construction activities related to Alternative 4 to encounter TCRs below ground surface underlying existing developments.

While no prehistoric archaeological resources have been identified within the Alternative 4 Archaeological RSA, two resources with Native American cultural material, P-19-000382 and P-19-004669, have been recorded within the vicinity. In addition, a 2018 archaeological sensitivity analysis of the West Los Angeles VA campus suggests a third site of Native American origin may be present in the vicinity (Onken et al., 2018). The sensitivity model developed by Onken and others in 2018 indicated that approximately 17 percent of the VA campus exhibits Holocene-age soils that have increased potential for buried prehistoric archaeological deposits. Sensitivity ranking also took into account proximity to water sources and previously recorded resources. Full-time or spot-check archaeological monitoring or buried site testing was recommended for all areas except those identified as having very low sensitivity (Onken et al., 2018).

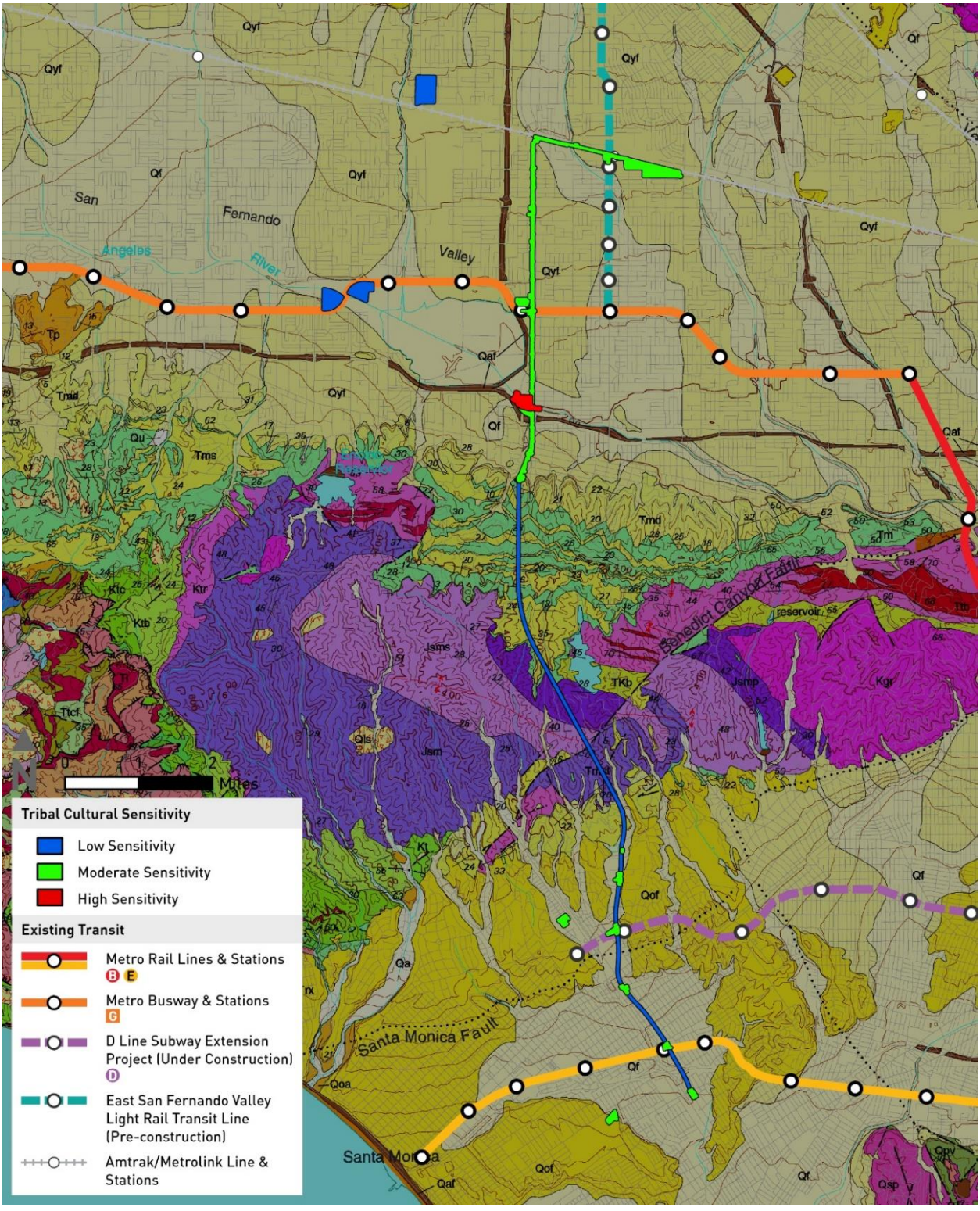
Most of the RSA north and south of the Santa Monica Mountains is in an alluvial depositional environment. Geologic mapping indicates that the majority of the RSA north and south of the Santa Monica Mountains is situated on Late Holocene to Pleistocene-aged alluvial fan deposits (Figure 3.16-11). The young age of the Holocene soils indicates that the sediments on which they formed were deposited in the last 5,000 years and, therefore, have a moderate potential for burial of older archaeological deposits. Generally, the younger a surficial alluvial landform is, the higher its potential for preservation of buried archaeological deposits. In addition, it has been demonstrated that archaeological sites are not distributed randomly across the landscape, but tend to correlate with certain environmental factors, including slope (flatter being more positively correlated) and distance to water and other resources.

The tribal cultural sensitivity of the Alternative 4 RSA is considered to range from low to high (Figure 3.16-11). The degree and depth of previous ground disturbance across the RSA are not known, but most of the RSA has been subject to prior construction and development. While the exact depth and degree of previous subsurface ground disturbance within the RSA is not known, grading for roads, rails, and parking lots, and previous construction activities for utilities and building foundations found across the Project Study Area are likely to have impacted approximately 5 feet below ground surface. Figure 3.16-11 depicts the estimated TCR sensitivity of the alignment based on current understanding of Alternative 4 components and should be revised as new information from tribal consultation and construction plans are received. Areas with low potential for TCR archaeological resources include older geologic deposits (such as where project components would be constructed at great depth or where near-surface Alternative 4 components would be in areas with older surficial deposits) and areas with very high levels of well-documented, previous subsurface ground disturbance. Areas with moderate potential to encounter archaeological resources include portions of the Tribal Cultural RSA in Holocene and late Pleistocene age soils near historic waterways, areas with limited previous ground disturbance, and areas in proximity to previously recorded archaeological resources or TCRs in or near the RSA.

It should be noted that archaeologists define sensitivity for archaeological resources as a potential for a location to contain intact deposits that can provide information of scientific value. TCRs, which may

include archaeological deposits, do not necessarily require the same level of preservation, and tribal representatives may be more concerned with identifying and protecting any and all cultural material associated with ancestral use of an area, regardless of scientific value. Alternative 4 components near sites with prehistoric components, such as P-19-000382 and P-19-004669, as well as areas near the Sepulveda Pass, the Los Angeles River, and the West Los Angeles VA campus (which has evidence of prehistoric use [Onken et al., 2018]), contribute to the sensitivity of at-grade and mass excavation locations in the vicinity of the resources.

Figure 3.16-11. Alternative 4: Tribal Cultural Sensitivity



Source: HTA, 2024

3.16.4.5 Alternative 5 Resource Study Area

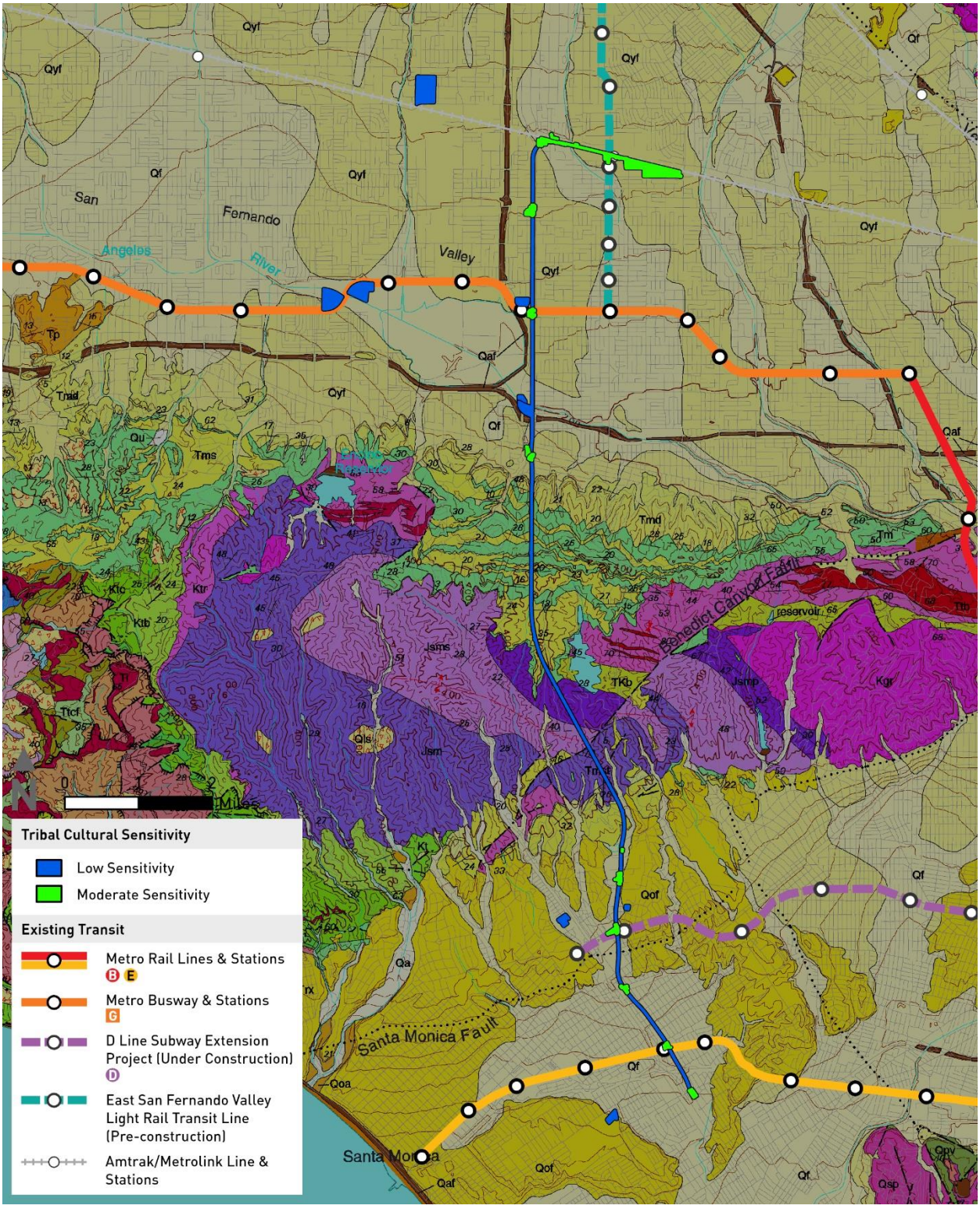
The Alternative 5 Tribal Cultural RSA is the same as the Alternative 4 Tribal Cultural RSA. As with Alternative 4, the Sepulveda Pass landscape is treated as a TCR consistent with AB 52 consultation. The following discussion addresses the results of the NAHC SLF search, ongoing AB 52 consultation, and discusses TCRs in the vicinity of the RSA and the potential to encounter previously unidentified TCRs within the RSA during construction.

Tribal Cultural Resources Sensitivity

As described for Alternative 4, no TCRs have been formally recorded in the Alternative 5 Tribal Cultural RSA and the same recorded village and prehistoric resources were identified in and near the RSA.

The tribal cultural sensitivity of the Alternative 5 RSA is considered to range from low to moderate (Figure 3.16-12). The degree and depth of previous ground disturbance across the RSA are not known, but a majority of the RSA has been subject to prior construction and development. While the exact depth and degree of previous subsurface ground disturbance for the RSA is not known, grading for roads, rails, and parking lots, and construction of utilities and building foundations found across the Project Study Area are likely to have impacted approximately 5 feet below ground surface.
Figure 3.16-12 depicts the estimated TCR sensitivity of the alignment based on current understanding of Alternative 5 components and should be revised as new information from tribal consultation and construction plans are received. The description of TCR sensitivity is the same as that provided for Alternative 4.

Figure 3.16-12. Alternative 5: Tribal Cultural Sensitivity



Source: HTA, 2024

3.16.4.6 Alternative 6 Resource Study Area

The SCCIC records search, NAHC SLF search, additional archival research, AB 52 consultation efforts, and pedestrian survey did not identify any formally documented TCR listed or eligible for listing in the CRHR or a local register of historical resources, within the Alternative 6 Tribal Cultural RSA. However, one ethnohistoric village site that is of importance to the tribal communities of the greater Los Angeles area is very close to the Alternative 6 RSA.

The following discussion addresses the results of the NAHC SLF search and ongoing AB 52 consultation, as well as TCRs in the vicinity of the Tribal Cultural RSA and the potential to encounter previously unidentified TCRs during construction of the Project.

Tribal Cultural Resources Sensitivity

While no TCRs have been formally recorded in the Tribal Cultural RSA, the cultural resources study did identify ethnohistoric villages, burials, important prehistoric travel routes, and natural resource areas nearby. In addition, the NAHC SLF search confirmed that the region contains Native American cultural resources, Traditional Cultural Properties, and/or TCRs. The site of a sacred spring associated with an ethnohistoric village is located less than 200 feet from the Archaeological RSA and has potential to encompass previously undisturbed, buried, cultural deposits in the area. Therefore, it is possible that unknown TCRs may be buried within the Alternative 6 Tribal Cultural RSA.

No TCRs were observed within the RSA during the cultural field survey. However, most of the Project Study Area is paved, and exposed surfaces available for inspection consist primarily of landscape features, which are often small and contain heavily disturbed soils or imported fill.

No documented villages have been recorded within the Alternative 6 Tribal Cultural RSA. However, the village of *Koruuvanga* (P-19-000382) is located approximately 200 feet north of the southern end of the Alternative 6 Tribal Cultural RSA, and the village of *Siutcanga* is located approximately 3 miles west of the northern end of the Alternative 6 Tribal Cultural RSA. Both villages were visited by the Portolá expedition in August of 1769, contain burial grounds, retain an archaeological footprint, and continue to be significant places to tribes of the greater Los Angeles area. Archaeological investigations and construction monitoring in the vicinity of these locations have encountered burials and material culture consistent with a long-term habitation site.

Villages operated as the primary settlement within a lineage or clan's territory, and the landscape surrounding the villages was used for the management and gathering of important plant resources, hunting, collecting useful natural resources such as asphalt or stone material for household implements, and traveling between smaller camps and neighboring villages throughout the year. For this reason, there is increased potential to encounter other TCRs in the vicinity of known village sites.

No formally recorded indigenous travel routes have been documented within the Alternative 6 Tribal Cultural RSA. A review of ethnographic literature, historic maps, contemporary research on the indigenous landscape, and comments provided by tribal representatives indicates that the Sepulveda Pass constitutes an important travel corridor. AB 52 consultation indicated that the Cultural RSA represents a significant landscape to tribes who have traditional knowledge of, and cultural connections to, the prominent corridor. The pass has been used for thousands of years to support exchange networks and travel, and it holds religious significance. Tribal representatives indicated the entire RSA corridor is in a landscape they consider to be a TCR.

For a cultural resource, including a cultural landscape, to be treated as a TCR, it must have a defined geographic area and meet the criteria of the CRHR. The Sepulveda Pass can be geographically defined by

the viewshed of the canyon between ridges that bound the pass. The Santa Monica Mountains, in which the Sepulveda Pass is located, are listed as a scenic vista and scenic resource in the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001) further supporting the value of this landscape. Although the Pass does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate this feature as a TCR. Out of an abundance of caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project.

The Portolá expedition traversed the canyon in early August 1769. from the springs, the expedition camped near the village of *Koruuvanga* then headed north, where it encountered the people of *Siutcanga*. The Alternative 6 alignment does not intersect the Sepulveda Pass, and the portion of the alignment that crosses the Los Angeles River is deeply buried. The 1937 Kirkman-Harriman pictorial map of Los Angeles (Kirkman, 1937) also depicts several old or "ancient" roads intersecting the southern end of the Alternative 6 Tribal Cultural RSA, as well as the Camino Real, crossing the RSA north of the Santa Monica Mountains. The exact location of these routes is difficult to confirm, but they likely follow existing trails and travel routes developed and used by the Gabrieliño and their neighbors. These routes were later developed into roads and highways that are in use today.

The Alternative 6 Tribal Cultural RSA is near several water courses that are important to Gabrieliño tribes. In the northern portion of Alternative 6, the RSA is intersected by the Los Angeles River north of the Santa Monica Mountains in an area east of where a confluence of drainages meets the river. An area approximately a mile east of the Alternative 6 Tribal Cultural RSA is now referred to as the Sepulveda Basin, and multiple prehistoric archaeological sites have been documented in the vicinity. The Sepulveda Pass, located approximately 1.75 miles west of the Alternative 6 RSA, also historically has had water running through it. At the south end of Alternative 6, several springs are mapped within 0.5 mile of the RSA. These riparian environments would have provided ideal locations for the acquisition of a variety of resources, and native people would have been likely to spend time in these areas. Though many of the water courses have been eradicated or channelized, historically they would have provided sources of fresh water that would create ideal conditions for certain plant resources and local fauna. Habitation sites and activity areas were also commonly established near reliable sources of fresh water.

The literature review, archival research, and tribal consultation identified the Los Angeles River as another landscape feature to be treated comparably to a TCR. The river has a placename in local tribal dialects, is mentioned in Gabrieleño history and lore, and is still used in contemporary tribal communities for ceremonial and cultural traditions (LA County, 2024; Lozano, 2018). A review of historic maps and history of the Los Angeles River development indicates that, while the portion of the river crossing the Alternative 6 RSA was channelized between 1948 and 1952, it continues to follow a route closely resembling the historic footprint. Although the Los Angeles River does not currently meet criteria to qualify as a TCR per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate this feature as a TCR. Out of an abundance of caution and with respect to input from tribes during consultation it will be treated in a manner consistent with a TCR for the Project. The Alternative 6 alignment is proposed to tunnel well beneath the Los Angeles River and is not anticipated to intersect the river or exhibit aboveground components in the area.

Archival research indicates that most archaeological deposits recorded within the RSA and a 0.5-mile radius were encountered below ground surface during construction activities. Site records for archaeological resources identified at the SCCIC indicate there is potential for Project-related construction activities to encounter TCRs below ground surface underlying existing developments.

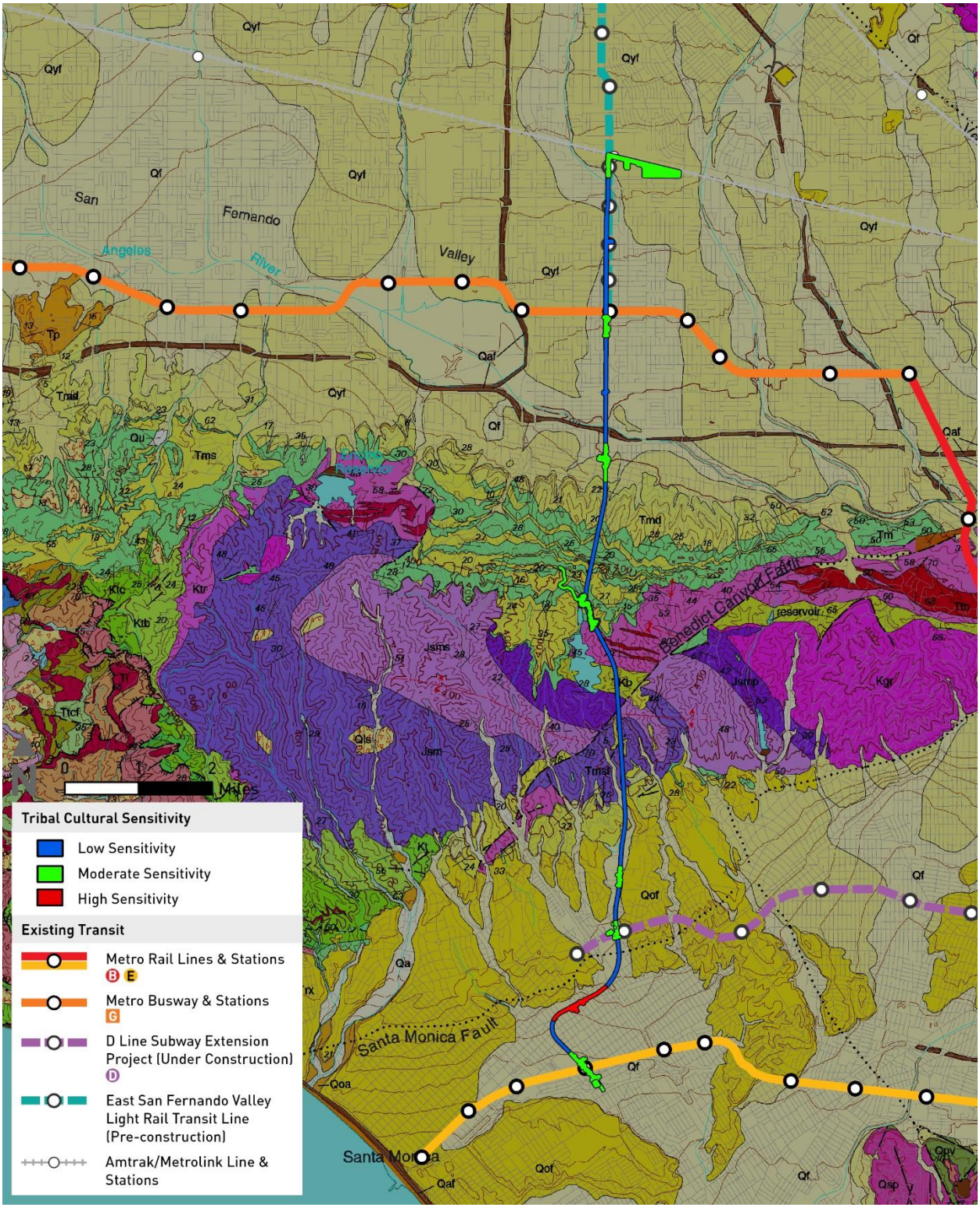
While no prehistoric archaeological resources have been identified within the Alternative 6 Archaeological RSA, two resources with Native American cultural material, P-19-000382 and P-19-004669, have been recorded within 0.5 mile of the RSA; one of those resources is approximately 200 feet north of the project footprint. In addition, a 2018 archaeological sensitivity analysis of the West Los Angeles VA campus suggests a third site of Native American origin may be present in the vicinity (Onken et al., 2018). The sensitivity model developed by Onken and others in 2018 indicated that approximately 17 percent of the VA campus exhibits Holocene-age soils that have increased potential for buried prehistoric archaeological deposits. Sensitivity ranking also took into account proximity to water sources and previously recorded resources. Full-time or spot-check archaeological monitoring or buried site testing was recommended for all areas except those identified as having very low sensitivity (Onken et al., 2018).

Most of the RSA north and south of the Santa Monica Mountains is in an alluvial depositional environment. Geologic mapping indicates that the majority of the RSA north and south of the Santa Monica Mountains is situated on Late Holocene to Pleistocene-aged alluvial fan deposits. The young age of the Holocene soils indicates that the sediments on which they formed were deposited in the last 5,000 years and, therefore, have a moderate potential for burial of older archaeological deposits. Generally, the younger a surficial alluvial landform is, the higher its potential for preservation of buried archaeological deposits. In addition, it has been demonstrated that archaeological sites are not distributed randomly across the landscape, but tend to correlate with certain environmental factors, including slope (flatter being more positively correlated) and distance to water and other resources.

The tribal cultural sensitivity of the Alternative 6 RSA is considered to range from low to high (Figure 3.16-13). The degree and depth of previous ground disturbance across the RSA are not known, but most of the RSA has been subject to prior construction and development. While the exact depth and degree of previous subsurface ground disturbance within the RSA is not known, grading for roads, rails, and parking lots, and previous construction activities for utilities and building foundations found across the Project Study Area are likely to have impacted approximately 5 feet below ground surface. Figure 3.16-13 depicts the estimated TCR sensitivity of the alignment based on current understanding of Alternative 6 components and should be revised as new information from tribal consultation and construction plans are received. Areas with low potential for archaeological resources include older geologic deposits (such as where Alternative 6 components would be constructed at great depth or where near-surface project components would be in areas with older surficial deposits) and areas with very high levels of well-documented, previous subsurface ground disturbance. Areas with moderate potential to encounter archaeological resources include portions of the Tribal Cultural RSA in Holocene and late Pleistocene age soils near historic waterways, areas with limited previous ground disturbance, and areas in proximity to previously recorded archaeological resources or TCRs in or near the RSA.

It should be noted that archaeologists define sensitivity for archaeological resources as a potential for a location to contain intact deposits that can provide information of scientific value. TCRs, which may include archaeological deposits, do not necessarily require the same level of preservation, and tribal representatives may be more concerned with identifying and protecting any and all cultural material associated with ancestral use of an area, regardless of scientific value. Alternative 6 components near P-19-000382 are considered to have high potential to encounter buried TCRs.

Figure 3.16-13. Alternative 6: Tribal Cultural Sensitivity



Source: HTA, 2024

3.16.5 Environmental Impacts

3.16.5.1 Impact TCR-1 Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, or 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?

Project Alternatives

No Project Alternative

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational Impacts

Within the Project Study Area, the only reasonably foreseeable transit improvement under the No Project Alternative would include changes to the Metro Route 761. Changes to the bus route would have no potential to affect tribal cultural resources as the existing bus route would continue to operate along existing streets and highways. Further, because the Project would not be built, its impacts on TCRs would not occur. The No Project Alternative would have no operational impacts to TCRs in the Tribal Cultural RSA.

Construction Impacts

Under the No Project Alternative, the Project would not be built, and its impacts on TCRs would not occur. Changes to the Metro Route 761 would require minimal or no construction activities, as the existing Metro bus line would simply be rerouted between the Metro E Line Expo/Sepulveda Station and the Van Nuys Metrolink/Amtrak Station. These potential termini already include transit infrastructure supporting bus feeder lines and would not require construction of new facilities to support the rerouted bus service. Minor bus stop modifications along the Metro Route 761 may be required; however, construction activities associated with these improvements would consist of minimal or no ground disturbance within existing sidewalks and street ROW. The maximum depth of disturbance required to implement any bus stop modifications associated with the rerouting of Metro Line 761 would be within the artificial fill depth associated with the existing street and would have minimal potential to encounter any previously undiscovered archaeological resources or TCRs. Impacts to TCRs would be less than significant.

Alternative 1

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs have been documented in the Alternative 1 alignment; therefore, operation and maintenance of the alignment would not physically demolish, destroy, relocate, or alter any previously recorded TCRs. However, during AB 52 consultation, representatives from multiple tribes indicated the importance of

the Tribal Cultural RSA landscape to their cultural heritage. Additionally, a literature review of ethnographic and historic sources, historic maps, and reporting on contemporary Native American knowledge and connection to the landscape resulted in the identification of two features, the Sepulveda Pass and the Los Angeles River, which exhibit potential to qualify as a TCR. Although these landscape features do not currently meet TCR criteria per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate them as TCRs. Out of an abundance of caution and with respect to input from tribes during consultation these features are being treated in a manner consistent with a TCR for the Project. Alternative 1 would have no direct operational impacts to the Sepulveda Pass or the Los Angeles River. However, operational and maintenance activities and increased pedestrian traffic at station locations would result in visual, audible, or atmospheric intrusions on the Sepulveda Pass and Los Angeles River.

The *Sepulveda Transit Corridor Project Visual Quality and Aesthetics Technical Report* (Metro, 2025b) that assessed the potential for visual and aesthetic impacts to the Santa Monica Mountains, including the Sepulveda Pass, and Los Angeles River, which are listed as scenic views or vistas under the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001). The existing view of the Sepulveda Pass and Los Angeles River would not be substantially affected by the aerial guideway constructed near these resources and Alternative 1 would result in a less than significant impact to these scenic vistas. Based on the current assessment of existing conditions and potential visual impacts (Metro, 2025b), operational impacts would not have the potential to cause a substantial adverse change in the significance of TCRs pursuant to PRC Section 21074. Tribal consultation is an important part of the process and continues to be conducted; however, the analysis to date concludes that operation of Alternative 1 would result in a less than significant impact to TCRs and would not require mitigation.

Construction Impacts

Confidential information shared by tribal representatives and review of cultural resource management gray literature suggest a portion of the Alternative 1 Built Environment RSA may encompass a sacred location. Additionally, during AB 52 consultation and literature review, two landscape features, the Sepulveda Pass and the Los Angeles River, were identified as significant places important to tribal cultural heritage. As such, for the purposes of this analysis, the Sepulveda Pass and Los Angeles River are being treated in a manner consistent with a TCR. Further, the presence of previously recorded archaeological sites with Native American components within 0.5 mile of the RSA and the presence of indigenous trails and important water resources in the vicinity suggest that buried TCRs may exist within the Alternative 1 Tribal Cultural RSA. One of these archaeological sites, P-19-000382, is an ethnographic village where at least two indigenous burials have been encountered. It is possible that significant unknown TCRs could be unearthed during project excavation activities.

The proposed alignment for Alternative 1 is largely within the public ROW that has already been disturbed during utility and street construction, but these disturbances were relatively shallow. Locations considered to have low potential to encounter TCRs are those in older geologic deposits, such project components would be constructed at great depth. Shallow construction work, such as for the at-grade portions of the alignment, has limited potential to encounter intact TCR archaeological deposits or human remains because of the prior shallow disturbances. However, other proposed construction activities, such as mass excavation required for new stations, monorail transit (MRT) footings, at-grade alignment segments, and ancillary facilities, have the potential to encounter deeper, intact archaeological deposits. Furthermore, while an archaeologist may place greater importance on the intact nature of archaeological deposits, tribes may be concerned with the potential to identify and protect prehistoric resources, regardless of scientific value. Impacts would be potentially significant.

Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for Alternative 1.

Alternative 3

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs have been documented in the Alternative 3 alignment; therefore, operation and maintenance of the alignment would not physically demolish, destroy, relocate, or alter any previously recorded TCRs. However, during AB 52 consultation, tribal representatives from multiple tribes indicated the importance of the Tribal Cultural RSA landscape to their cultural heritage. Additionally, a literature review of ethnographic and historic sources, historic maps, and reporting on contemporary Native American knowledge and connection to the landscape resulted in the identification of two features, the Sepulveda Pass and the Los Angeles River, which exhibit potential to qualify as a TCR. Although these landscape features do not currently meet TCR criteria per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate them as TCRs. Out of an abundance of caution and with respect to input from tribes during consultation these features are being treated in a manner consistent with a TCR for the Project. Alternative 3 would have no direct operational impacts to the Sepulveda Pass or the Los Angeles River. However, operational and maintenance activities and increased pedestrian traffic at station locations would result in visual, audible, or atmospheric intrusions on the Sepulveda Pass and Los Angeles River.

Per the *Sepulveda Transit Corridor Project Visual Quality and Aesthetics Technical Report* (Metro, 2025b) that assessed the potential for visual and aesthetic impacts to the Santa Monica Mountains, including the Sepulveda Pass, and Los Angeles River, which are listed as scenic views or vistas under the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001). The existing view of the Sepulveda Pass and Los Angeles River would not be substantially affected by the aerial guideway constructed near these resources and Alternative 3 would result in a less than significant impact to these scenic vistas. Based on the current assessment of existing conditions and potential visual impacts (Metro, 2025b), operational impacts would not have the potential to cause a substantial adverse change in the significance of TCRs pursuant to PRC Section 21074. Tribal consultation is an important part of the process and continues to be conducted; however, the analysis to date concludes that operation of Alternative 3 would result in a less than significant impact to TCRs and would not require mitigation.

Construction Impacts

Confidential information shared by tribal representatives and review of cultural resource management gray literature suggest a portion of the Alternative 3 Built Environment RSA may encompass a sacred location. Additionally, during AB 52 consultation and literature review, two landscape features, the Sepulveda Pass and the Los Angeles River, have been identified as significant places important to tribal cultural heritage. As such, for the purposes of this analysis, the Sepulveda Pass and the Los Angeles River are being treated in a manner consistent with a TCR. Further, the presence of previously recorded archaeological sites with Native American components within 0.5 mile of the RSA, and the presence of indigenous trails and important water resources in the vicinity, suggest that buried TCRs may exist within the Alternative 3 Tribal Cultural RSA. One of these archaeological sites, P-19-000382, is an ethnographic village where at least two indigenous burials have been encountered. It is possible that significant unknown TCRs could be unearthed during project excavation activities. The proposed alignment for Alternative 3 is largely within the public ROW that has already been disturbed with utility and street construction, but those disturbances were relatively shallow. Locations considered to have low potential to encounter TCRs are those in older geologic deposits, such as tunnel locations where project components would be constructed at great depth. Shallow construction work, such as for the at grade portions of the alignment, has limited potential to encounter intact TCR archaeological deposits or human remains because of the prior shallow disturbances. However, other proposed construction activities, such as mass excavation required for new stations, MRT footings, at-grade alignment segments, some tunnel construction, and ancillary facilities, have the potential to encounter deeper, intact archaeological deposits. Further, while an archaeologist may place greater importance on the intact nature of archaeological deposits, tribes may be concerned with the potential to identify and protect prehistoric resources, regardless of scientific value. Therefore, construction of the Alternative 3 alignment has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. Impacts would be potentially significant. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for Alternative 3.

Alternative 4

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs have been documented in the Alternative 4 alignment. Therefore, operation and maintenance of the alignment would not physically demolish, destroy, relocate, or alter any previously recorded TCRs. However, during AB 52 consultation, tribal representatives from multiple tribes indicated the

importance of the Tribal Cultural RSA landscape to their cultural heritage. Additionally, a literature review of ethnographic and historic sources, historic maps, and reporting on contemporary Native American knowledge and connection to the landscape resulted in the identification of two features, the Sepulveda Pass and the Los Angeles River, which exhibit potential to qualify as a TCR. Although these landscape features do not currently meet TCR criteria per PRC section 21074, AB52 consultation is on-going and further input from participating tribes is required to formally designate them as TCRs. Out of an abundance of caution and with respect to input from tribes during consultation these features are being treated in a manner consistent with a TCR for the Project. Alternative 4 would have no direct operational impacts to the Sepulveda Pass or the Los Angeles River. However, operational and maintenance activities and increased pedestrian traffic at station locations would result in visual, audible, or atmospheric intrusions on the Sepulveda Pass and Los Angeles River.

According to *Sepulveda Transit Corridor Project Visual Quality and Aesthetics Technical Report* (Metro, 2025b) that assessed the potential for visual and aesthetic impacts to the Santa Monica Mountains, including the Sepulveda Pass, and Los Angeles River, which are listed as scenic views or vistas under the *Conservation Element of the City of Los Angeles General Plan* (DCP, 2001). The existing view of the Sepulveda Pass and Los Angeles River would not be substantially affected by the aerial guideway constructed near these resources and Alternative 4 would result in a less than significant impact to these scenic vistas. Based on the current assessment of existing conditions and potential visual impacts (Metro, 2025b), operational impacts would not have the potential to cause a substantial adverse change in the significance of TCRs pursuant to PRC Section 21074. Tribal consultation is an important part of the process and continues to be conducted; however, the analysis to date concludes that operation of Alternative 4 would result in a less than significant impact to TCRs and would not require mitigation.

Construction Impacts

Confidential information shared by tribal representatives and review of cultural resource management gray literature suggest that sacred locations may be located less than 0.5 mile from the alignment. Additionally, during the AB 52 consultation and literature review, two landscape features, the Sepulveda Pass and the Los Angeles River, have been identified as significant places important to tribal cultural heritage. As such, for the purposes of this analysis, the Sepulveda Pass and the Los Angeles River are being treated in a manner consistent with a TCR. Further, the presence of previously recorded archaeological sites with Native American components within 0.8 mile of the RSA, and the presence of indigenous trails and important water resources in the vicinity, suggest that buried TCRs may exist within the Alternative 4 Tribal Cultural RSA. One of these archaeological sites, P-19-000382, is an ethnographic village where at least two indigenous burials have been encountered. It is possible that significant unknown TCRs could be unearthed during project excavation activities.

The proposed alignment for Alternative 4 is largely within the public ROW that has already been disturbed with utility and street construction, but those disturbances were relatively shallow. Locations considered to have low potential to encounter TCRs are those in older geologic deposits, such as tunnel locations where project components would be constructed at great depth. Shallow construction work, such as for the at-grade portions of the alignment, has limited potential to encounter intact TCR archaeological deposits or human remains due to prior disturbance. However, other proposed construction activities, such as mass excavation required for new stations, heavy rail transit (HRT) footings, at-grade alignment segments, TBM launch and extraction sites, and ancillary facilities, have the potential to encounter deeper, intact archaeological deposits. Furthermore, while an archaeologist may place greater importance on the intact nature of archaeological deposits, tribes may be concerned with the potential to identify and protect prehistoric resources, regardless of scientific value. Therefore,

construction of the Alternative 4 alignment has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. Impacts would be potentially significant. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for Alternative 4.

Alternative 5

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Project activities during operations would be limited to the operation and maintenance of the alignment. No TCRs have been documented in the Alternative 5 alignment. Therefore, operation and maintenance of the alignment would not physically demolish, destroy, relocate, or alter any TCRs. For the purposes of this analysis, the Sepulveda Pass and the Los Angeles River are being treated in manner consistent with a TCR. Alternative 5 would have no direct or indirect operational impacts to the Sepulveda Pass or the Los Angeles River. Under Alternative 5 alignment, there would be no operational impacts to TCRs listed or eligible for listing in the CRHR or a local register of historical resources. Therefore, operational impacts would not cause a substantial adverse change in the significance of TCRs pursuant to PRC Section 21074.

Construction Impacts

Confidential information shared by tribal representatives and review of cultural resource management gray literature suggest a portion of the Alternative 5 Built Environment RSA may encompass a sacred location. Additionally, during AB 52 consultation and literature review, two landscape features, the Sepulveda Pass and the Los Angeles River, were identified as significant places important to tribal cultural heritage. As such, for the purposes of this analysis, the Sepulveda Pass and the Los Angeles River are being treated in a manner consistent with a TCR. Further, the presence of previously recorded archaeological sites with Native American components within 0.5 mile of the RSA and the presence of indigenous trails and important water resources in the vicinity suggest that buried TCRs may exist within the Alternative 5 Tribal Cultural RSA. One of these archaeological sites, P-19-000382, is an ethnographic village where at least two indigenous burials have been encountered. It is possible that significant unknown TCRs could be unearthed during project excavation activities.

The proposed alignment for Alternative 5 is largely within the public ROW that has already been disturbed with utility and street construction, but those disturbances were relatively shallow. Locations considered to have low potential to encounter TCRs are those in older geologic deposits, such as tunnel locations where project components would be constructed at great depth. Shallow construction work,

such as for the at-grade portions of the alignment, has limited potential to encounter intact TCR archaeological deposits or human remains due to prior disturbance, but other proposed construction activities, such as mass excavation required for new stations, HRT footings, TBM launch, and extraction sites, at-grade alignment segments and ancillary facilities, have the potential to encounter deeper, intact archaeological deposits. Further, while an archaeologist may place greater importance on the intact nature of archaeological deposits, tribes may be concerned with the potential to identify and protect prehistoric resources, regardless of scientific value. Therefore, construction of the Alternative 5 alignment has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. Impacts would be potentially significant. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for Alternative 5.

Alternative 6

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Project activities during operations would be limited to the operation and maintenance of the alignment. No TCRs have been documented in the Alternative 6 alignment. Therefore, operation and maintenance of the alignment would not physically demolish, destroy, relocate, or alter any TCRs. For the purposes of this analysis, the Sepulveda Pass and the Los Angeles River are being treated in manner consistent with a TCR. Alternative 6 would have no direct or indirect operational impacts to the Sepulveda Pass or the Los Angeles River. Under Alternative 6 alignment, there would be no operational impacts to TCRs listed or eligible for listing in the CRHR or a local register of historical resources. Therefore, operational impacts would not cause a substantial adverse change in the significance of TCRs pursuant to PRC Section 21074.

Construction Impacts

Based on tribal consultation, archival research, and field survey, no resources meeting the criteria to be documented as TCRs exist within the Alternative 6 Tribal Cultural/Archaeological RSA. However, one NAHC-designated sacred site is located within 200 feet of the Tribal Cultural RSA. Additionally, during AB 52 consultation and literature review, two landscape features, the Sepulveda Pass and the Los Angeles River, were identified as significant places important to tribal cultural heritage. As such, for the purposes of this analysis, the Sepulveda Pass and Los Angeles River are being treated in a manner consistent with a TCR. The presence of previously recorded archaeological sites with Native American components in such close proximity to the RSA and the presence of indigenous trails and important water resources in

the vicinity suggest that buried TCRs may exist within the Alternative 6 Tribal Cultural RSA. The resource documented within close proximity to the Tribal Cultural RSA is an ethnographic village where at least two indigenous burials have been encountered. It is possible that significant resources could be unearthed during project excavation activities.

The proposed alignment for Alternative 6 is largely within the public ROW that has already been disturbed with utility and street construction, but those disturbances were relatively shallow. Locations considered to have low potential to encounter TCRs are those in older geologic deposits, such as tunnel locations where project components would be constructed at great depth. Because of the prior disturbances, shallow construction work, such as for the at-grade portions of the alignment, has limited potential to encounter intact TCR archaeological deposits and human remains. However, other proposed construction activities, such as mass excavation required for new stations, TBM launch and extraction sites, near-surface construction activities, and ancillary facilities, have the potential to encounter deeper, intact archaeological deposits. Furthermore, while an archaeologist may place greater importance on the intact nature of archaeological deposits, tribes may be concerned with the potential to identify and protect prehistoric resources, regardless of scientific value. Therefore, construction of the Alternative 6 alignment has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. Impacts would be potentially significant. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for Alternative 6.

Maintenance and Storage Facilities

Monorail Transit Maintenance and Storage Facility Base Design (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs are located within the MSFs. Operational activities at MSFs do not typically involve excavation that have potential to affect subsurface TCRs. No operational impacts to archaeological resources would occur.

Construction Impacts

An assessment of TCR sensitivity for the Tribal Cultural RSA as described in Section 3.16.4.2 indicates construction activities associated with the MSF Base Design would have moderate potential to encounter previously unidentified TCRs below ground surface (Figure 3.16-9).

No TCRs have been identified within the MSF Base Design; however, the sediments present in the area consist of younger and older quaternary alluvium, which have potential to contain archaeological deposits and TCRs that could be impacted by ground-disturbing activities.

Construction of the MSF Base Design has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. The potential impacts to TCRs related to construction of the alignment alternative would be significant, and mitigation is required. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for the MSF Base Design.

Monorail Transit Maintenance and Storage Facility Design Option 1 (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs are located within the Alternative 1 MSF Design Option 1. Operational activities at MSFs do not typically involve excavation that have potential to affect subsurface TCRs. No operational impacts to archaeological resources would occur.

Construction Impacts

An assessment of TCR sensitivity for the Tribal Cultural RSA as described in Section 3.16.4.2 Indicates construction activities associated with the Alternative 1 MSF Design Option 1 would have moderate potential to encounter previously unidentified TCRs below ground surface (Figure 3.16-9). No TCRs have been identified within the MSF Design Option 1; however, the sediments present in the area consist of younger and older quaternary alluvium, which have potential to contain archaeological deposits and TCRs that could be impacted by ground-disturbing activities.

Construction of the Alternative 3 MSF Design Option 1 has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. The potential impacts to TCRs related to construction of the alignment alternative would be significant, and mitigation is required. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for

discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for the MSF Design Option 1.

Electric Bus Maintenance and Storage Facility (Alternative 1)

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs are located within the Electric Bus MSF. Operational activities at MSFs do not typically involve excavation that have potential to affect subsurface TCRs. No operational impacts to archaeological resources would occur.

Construction Impacts

An assessment of TCR sensitivity for the Tribal Cultural RSA as described in Section 3.16.4.2 indicates construction activities associated with the Electric Bus MSF would have moderate potential to encounter previously unidentified TCRs below ground surface (Figure 3.16-9). No TCRs have been identified within the Electric Bus MSF; however, the sediments present in the area consist of younger and older quaternary alluvium, which have potential to contain archaeological deposits and TCRs that could be impacted by ground-disturbing activities.

Construction of the Electric Bus MSF has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. The potential impacts to TCRs related to construction of the Alternative 1 alignment would be significant, and mitigation is required. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for the Electric Bus MSF.

Heavy Rail Transit Maintenance and Storage Facility (Alternatives 4 and 5)

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs are located within the MSFs. Operational activities at MSFs do not typically involve excavation that have potential to affect subsurface TCRs. No operational impacts to archaeological resources would occur.

Construction Impacts

An assessment of TCR sensitivity for the Tribal Cultural RSA as described in Section 3.16.4.4 indicates construction activities associated with the MSF would have moderate potential to encounter previously unidentified TCRs below ground surface (Figure 3.16-11). No TCRs have been identified within the MSF; However, the sediments present in the area consist of younger and older quaternary alluvium which have potential to contain archaeological deposits and TCRs that could be impacted by ground-disturbing activities.

Construction of the MSF has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. The potential impacts to TCRs related to construction of the alignment alternative would be significant and mitigation is required. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for the MSF.

Heavy Rail Transit Maintenance and Storage Facility (Alternative 6)

Impact Statement

Operational Impact: No Impact

Construction Impact: Less than Significant with Mitigation

Operational Impacts

No TCRs are located within the MSFs. Operational activities at MSFs do not typically involve excavation that have potential to affect subsurface TCRs. No operational impacts to archaeological resources would occur.

Construction Impacts

An assessment of TCR sensitivity for the Tribal Cultural RSA as described in Section 3.16.4.6 indicates construction activities associated with the Alternative 6 MSF would have moderate potential to encounter previously unidentified TCRs below ground surface (Figure 3.16-13). No TCRs have been identified within the MSF construction footprint; however, the sediments present in the area consist of younger and older quaternary alluvium, which have potential to contain archaeological deposits and TCRs that could be impacted by ground-disturbing activities.

Construction of the Alternative 6 MSF has the potential to cause a substantial adverse change in the significance of a TCR listed or eligible for listing in the CRHR or a local register of historical resources. The potential impacts to TCRs related to construction of the alignment alternative would be significant, and mitigation is required. Section 3.16.6 discusses the proposed mitigation measures, which require Native American monitoring during ground disturbance, work stoppage and consultation if Tribal Cultural Resources or human remains are encountered, and the implementation of protective measures to ensure culturally appropriate treatment and compliance with legal requirements. Additionally, MM CUL-1,MM-CUL-6, MM CUL-7 and MM CUL-8, described in Section 3.4.6, would be implemented, which require construction personnel training on identifying and responding to cultural and Tribal Cultural Resources, archaeological monitoring in sensitive areas, work stoppage and treatment protocols for discovered artifacts, and procedures for the respectful handling of human remains in accordance with legal and tribal requirements. With implementation of MM TCR-1 and MM TCR-2, as well as MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8, impacts on TCRs would be reduced to less than significant for the MSF.

3.16.6 Mitigation Measures

There could be significant impacts to TCRs during construction of each project alternative and MSFs. Therefore, the following mitigation measures were developed. AB 52 Consultation is ongoing and any final mitigation measures for TCRs will be determined through consultation with tribes.

MM TCR-1: Native American Monitoring

- *Project related ground disturbing activities conducted in locations determined to have moderate to high archaeological sensitivity, or other locations determined appropriate through Assembly Bill 52 consultation, shall be monitored by a Native American representative from a consulting tribe, in accordance with the Cultural Resources Monitoring and Mitigation Plan detailed in MM CUL-1. The tribal monitor shall be qualified by his or her tribe to monitor Tribal Cultural Resources.*
- *In the event that an archaeological resource discovered during project construction is determined to be potentially of Native American origin based on the initial assessment of the find by a Secretary of the Interior-qualified archaeologist pursuant to California Public Resource Code Section 21083.2(i), the Native American tribes that consulted on the Project pursuant to Assembly Bill 52 shall be notified. Those tribes shall also be provided information about the find to allow for early input from the tribal representatives with regard to the potential significance and treatment of the resource. Resources shall be treated with culturally appropriate dignity, taking into consideration the tribal cultural values and meaning of the resource.*
- *If, as a result of the inadvertent resource discovery evaluation and tribal consultation process, the resource is considered to be a Tribal Cultural Resource and determined, in accordance with California Public Resource Code Section 21074, to be eligible for inclusion in the California Register of Historical Resources or a local register of historical resources or is determined to be significant by the California Environmental Quality Act lead agency (Metro), the qualified archaeologist and Native American monitor shall monitor all remaining ground-disturbing activities in the area of the resource. The input of all consulting*

tribes shall be considered in the preparation of any required treatment plan activities prepared by the qualified archaeologist for any Tribal Cultural Resources identified during the project construction as required in the Cultural Resources Monitoring and Mitigation Plan (MM CUL-1).

- *Work in the area of the discovery may not resume until evaluation and treatment of the resource is completed and/or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while evaluation and treatment of the resource takes place.*

MM TCR-2: Unanticipated Discovery of Human Remains

- *If human remains are discovered, work in the immediate vicinity of the discovery shall be suspended and the Los Angeles County Coroner shall be contacted immediately. If the remains are deemed Native American in origin, the coroner shall contact the Native American Heritage Commission and identify a Most Likely Descendant pursuant to Public Resource Code Section 5097.98 and California Code of Regulations Section 15064.5. The Most Likely Descendants may inspect the site within 48 hours of being notified and may issue recommendations for scientific removal and nondestructive analysis. If the Most Likely Descendant fails to make recommendations, then Metro and/or the landowner may rebury the remains in a location not subject to further disturbance, at their discretion. Work may be resumed at Metro's discretion but shall commence only after consultation and treatment have been concluded. Work may continue on other parts of the Project while consultation and treatment are conducted.*

Impacts After Mitigation

The project exhibits low to high sensitivity for TCRs. Potential impacts from construction of all project alternatives include disturbing previously unknown TCRs that may be buried below the surface. Due to the highly developed setting of the project footprint, conducting subsurface testing in sensitive areas of the alignment to identify evidence of intact soils or subsurface deposits is not feasible and would be unlikely to provide information that could reduce the sensitivity assessments. Providing training to construction personnel on how to identify TCRs and appropriate steps in the event TCRs are encountered would reduce the likelihood of a significant impact in the event TCRs may be encountered during Project activities. Additionally, having Native American Monitors and archaeological monitors on site during ground disturbing construction activities in sensitive areas would ensure the appropriate identification and treatment of inadvertent discoveries, which would further reduce any impacts to TCRs to less than significant.

With implementation of MM CUL-1, MM CUL-6, MM CUL-8, detailed in Section 3.4, as well as MM TCR-1 and MM TCR-2, impacts related to TCRs would be reduced to less than significant for all project alternatives. The No Project Alternative was determined to have a less than significant impact and no mitigation measures are required. (Refer to the *Sepulveda Transit Corridor Project Cultural Resources and Tribal Cultural Resources Technical Report* [Metro, 2025a] for information regarding MM CUL-1, MM CUL-6, MM CUL-7, and MM CUL-8).

Table 3.16-1. Summary of Mitigation Measures and Impacts Before and After Mitigation for the Project Alternatives

CEQA Impact Topic		No Project	Alt 1	Alt 3	Alt 4	Alt 5	Alt 6
Operational							
Impact TCR-1: Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, or 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?	Impacts Before Mitigation	NI	LTS	LTS	LTS	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	LTS	LTS	LTS	NI	NI
Construction							
Impact TCR-1: Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, or 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?	Impacts Before Mitigation	LTS	PS	PS	PS	PS	PS
	Applicable Mitigation	NA	MM CUL-1 MM CUL-6 MM CUL-7 MM CUL-8 MM TCR-1 MM TCR-2	MM CUL-1 MM CUL-6 MM CUL-7 MM CUL-8 MM TCR-1 MM TCR-2	MM CUL-1 MM CUL-6 MM CUL-7 MM CUL-8 MM TCR-1 MM TCR-2	MM CUL-1 MM CUL-6 MM CUL-7 MM CUL-8 MM TCR-1 MM TCR-2	MM CUL-1 MM CUL-6 MM CUL-7 MM CUL-8 MM TCR-1 MM TCR-2
	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS	LTS

Source: HTA, 2024

CUL = cultural
LTS = less than significant
MM = mitigation measure
NA = not applicable
NI = no impact
PRC = Public Resources Code
PS = potentially significant
TCR = tribal cultural resource

Table 3.16-2. Summary of Mitigation Measures and Impacts Before and After Mitigation for the Maintenance and Storage Facilities

CEQA Impact Topic		MRT MSF Base Design (Alts 1 and 3)	MRT MSF Design Option 1 (Alts 1 and 3)	Electric Bus MSF (Alt 1)	HRT MSF (Alts 4 and 5)	HRT MSF (Alt 6)
Operational						
Impact TCR-1: Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, or 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?	Impacts Before Mitigation	NI	NI	NI	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Construction						
Impact TCR-1: Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, or 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?	Impacts Before Mitigation	PS	PS	PS	PS	PS
	Applicable Mitigation	MM TCR-1 MM TCR-2	MM TCR-1 MM TCR-2	MM TCR-1 MM TCR-2	MM TCR-1 MM TCR-2	MM TCR-1 MM TCR-2
	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS

Source: HTA, 2024

LTS = less than significant
MM = mitigation measure
NA = not applicable
NI = no impact
PRC = Public Resources Code
PS = potentially significant
TCR = tribal cultural resource