Appendix L

Tribal Report

Tribal Cultural Resources Assessment for the 525 South Virgil Avenue Project in the City of Los Angeles, Los Angeles County, California

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EXECUTIVE SUMMARY

Kimley-Horn and Associates, Inc. (Kimley-Horn) prepared a Tribal Cultural Resources Assessment for the 525 South Virgil Avenue Project (Project) area located within the City of Los Angeles (Lead Agency) in Los Angeles County, California. This study was completed to support the Lead Agency's review of potential impacts to Tribal Cultural Resources (TCRs) as a result of the proposed Project pursuant to the California Environmental Quality Act (CEQA). However, as required under the Assembly Bill 52 (AB 52) amendments to CEQA, TCRs are identified through formal consultation with affiliated/interested Tribes. As such, this Assessment serves only to supplement the Lead Agency's efforts.

This Assessment summarizes historical and cultural information for the Project area and immediate vicinity. Some information utilized within the report, such as a confidential record search at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), was retrieved from an Archaeological Resources Assessment prepared for the Project by Kimley-Horn in December 2025. Given the Project area is fully developed, no pedestrian survey was conducted for the archaeological investigation or the current study. This TCR assessment also summarizes the results of a review of historical and ethnographic information available to the public, as well as formal AB52 consultation conducted by the Lead Agency with interested Tribes. While the results of the SCCIC record search and SLF search were negative for cultural and ethnographic resources within or adjacent to the Project area, ethnographic research and a review of the Project area's historic environmental context highlighted potential sensitivity of the Project area to the Gabrieleno Tongva. Additionally, the City's consultation efforts with the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation), who were the only of eight Tribes to respond to formal project notifications, indicates sensitivity for potential TCRs within or near the Project area. Kizh Nation provided requested mitigation measures to ensure the protection of significant cultural resources which have been incorporated as MM TCR-1, MM TCR-1a, and MMT-TCR 1b.

Compliance with the mitigation measures would ensure any found resources are treated in accordance with mitigation measures requested by the Kizh Nation tribes and federal, state, and local guidelines, including those set forth in PRC Section 21083.2. As such, the Project could potentially result in a significant impact on a tribal cultural resource. Therefore, impacts would be less than significant with mitigation incorporated.

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1.0 INTRODUCTION

Kimley-Horn and Associates, Inc. (Kimley-Horn) prepared a Tribal Cultural Resources Assessment for the 525 South Virgil Avenue Project (Project) area located within the City of Los Angeles (Lead Agency) in Los Angeles County, California. This study was completed to support the Lead Agency's review of potential impacts to Tribal Cultural Resources (TCRs) as a result of the proposed Project pursuant to the California Environmental Quality Act (CEQA). TCRs can involve a wide range of resources including prehistoric village sites, ceremonial centers, and burial sites, as well as natural resources such as rivers, mountain ranges, and springs, as well as intangible resources such as viewsheds. Some information utilized within the report, such as a confidential record search at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), was retrieved from an Archaeological Resources Assessment prepared for the Project by Kimley-Horn in December 2025. Given the Project area is fully developed, no pedestrian survey was conducted for the archaeological investigation or the current study. A Historical Resources Technical Report was prepared by Historic Resources Group, dated November 2025 under separate cover. The Historic Report determined that the existing four-story commercial office building at 525 South Virgil Avenue does not meet the eligibility requirements to be considered a historic resource.

This TCR assessment also summarizes the results of a review of historical and ethnographic information available to the public, as well as formal consultation conducted by the Lead Agency with interested Tribes. However, as required under the Assembly Bill 52 (AB52) amendments to CEQA, TCRs are identified solely through formal consultation with affiliated/interested Tribes. As such, this Assessment serves only to supplement the Lead Agency's efforts.

2.0 PROJECT DESCRIPTION

The property is located at 515-531 South Virgil Avenue and 518-526 South Westmoreland Avenue, Los Angeles, CA 90020 on Assessor Parcel Number (APN) 5077-004-030 in Los Angeles, California (**Figure 1** and **Figure 2**). The Project area is an approximately 0.97-acre (42,146 square feet) site comprised of seven legal lots and located in the Koreatown neighborhood.

The Project would demolish the existing 56,072 sf vacant office four-story building and its associated parking lot and construct an approximately 252,873 sf, eight-story self-storage building and ground-level parking. The new building would be approximately 90 feet, 11 inches tall. Self-storage uses would be located on the first through eighth floors. The ground floor would also contain an office, a lobby, restrooms, elevators, a transformer yard, and 50 bicycle parking spaces (25 short-term and 25 long-term). A street-level display window on Virgil Avenue showcasing products available for purchase would also be located on the ground floor of the Project. Also located on the ground floor would be approximately 24 covered automobile stalls, including two Americans with Disabilities Act (ADA) compliant stalls and three electric vehicle (EV) parking stalls. The Project would also include some drought-tolerant landscaping as well as multiple large murals. The Project would have an FAR of approximately 6.0.

Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. The Project proposes to reconstruct and slightly shift the existing driveway on Westmoreland Avenue and to construct a new driveway on Virgil Avenue. Additionally, all loading, unloading, and refuse areas will be within the covered parking garage.

Development of the Project would require the export of approximately 5,600 cubic yards (cy) of soil, (7,280 cy with a 30-percent swell factor applied). For the purposes of this analysis, the Project's construction schedule is assumed to be approximately 18 months, with construction beginning in the second quarter of 2027 and ending in the fourth quarter of 2028. The Project is anticipated to be operational in 2028.

3.0 REGULATORY CONTEXT

California Environmental Quality Act

The California Environmental Quality Act applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations [CCR] 14(3), § 15002(i)).

Under CEQA, "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment" (14(3) CCR § 15064.5(b)). Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (CRHR);
- A resource included in a local register of historical resources (as defined at Cal. Public Res. Code[PRC] § 5020.1(k)) or identified as significant in a historical resource survey meeting the requirements of § 5024.1(g) of the Cal. Public Res. Code; or
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR.

The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the CRHR (State CEQA Guidelines § 15064.5). If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines § 15126.4(a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource (California Office of Historic Preservation N.D.). Section 5024.1 of the PRC established the CRHR. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (14(3) CCR § 15064.5(a)(3)).

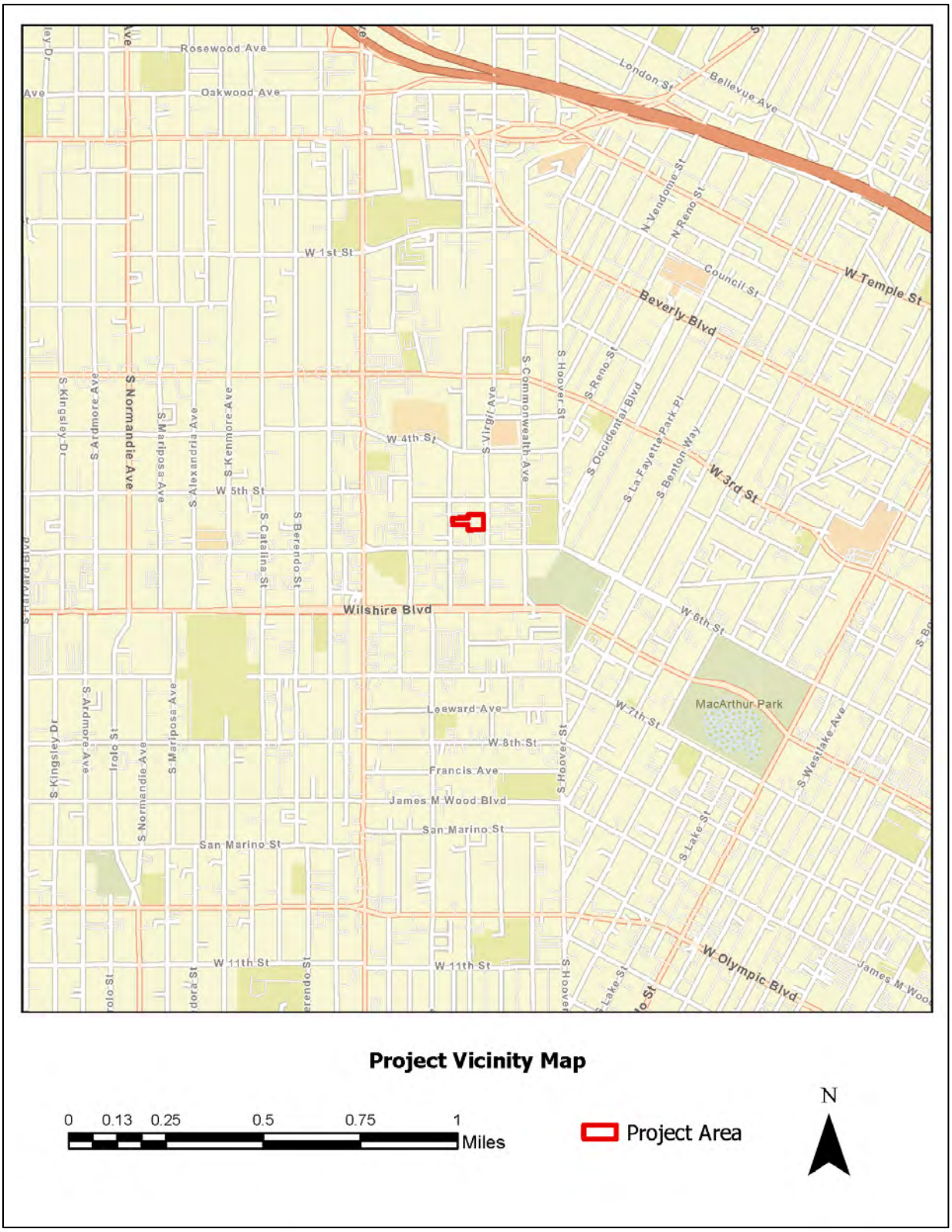


Figure 1: Project Vicinity Map

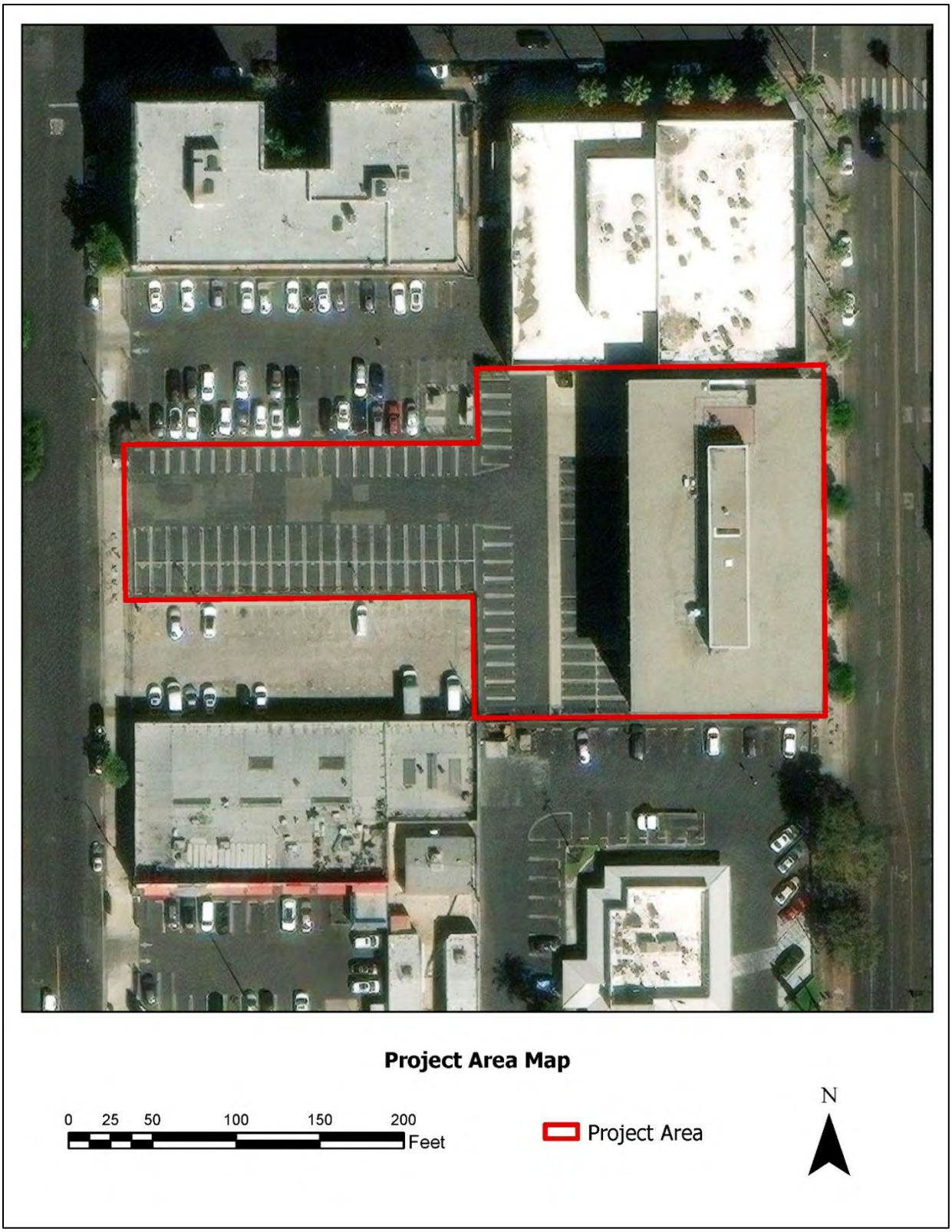


Figure 2: Project Area Map

Finally, CEQA requires that significant effects on unique archaeological resources be considered and addressed (State CEQA Guidelines § 21083.2). State CEQA Guidelines section 21083.2(g) defines a unique archaeological resource as any 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.

CEQA Guidelines Appendix G includes significance criteria relative to archaeological and historical resources. These have been utilized as thresholds of significance here, and a project would have a significant environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;
- Disturb any human remains, including those interred outside of dedicated cemeteries.

California Public Resources Code

PRC § 5024.1 establishes the CRHR. The register lists all California properties considered to be significant historical resources. The CRHR also includes all properties listed or determined eligible for listing in the National Register of Historic Places (NRHP), including properties evaluated and determined eligible under § 106 of the National Historic Preservation Act.

PRC § 5020 renamed the Historical Landmarks Advisory Committee as the State Historical Resources Commission. The Commission oversees the administration of the CRHR and is responsible for designating State Historical Landmarks and Historical Points of Interest (PRC § 5020.4).

PRC § 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation, which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC § 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

California Health and Safety Code

California Health and Safety Code § 7050.5-7055 govern the process for reporting inadvertent discoveries of human remains to the County Coroner; the process for the County Coroner to report human remains of Native American descent to the NAHC; and the protections offered against removal or desecration of human remains.

California Code of Regulations

The California Code of Regulations governs the nomination of resources to the CRHR (14 CCR § 4850 *et seq*.). The regulations set forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations.

California Register of Historical Resources

The State Historical Resources Commission has designed the CRHR for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the state's significant historical and archeological resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. To be eligible for listing in the CRHR, a resource must meet at least one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- Is associated with the lives of persons important to local, California, or national history;
- Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values; or
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation (14 CCR § 4852(b)).

In addition to having significance, resources must have integrity for the period of significance (14 CCR § 4852(c)). The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions (14 CCR § 4852(c)). Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance (14 CCR § 4852(c)). Alterations to a resource or changes in its use over time may change its historical, cultural, or architectural significance (*Id*.). Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data (*Id*.).

Isolated finds, such as a single artifact with no other associated cultural materials, are generally considered to be ineligible for listing in the CRHR because of their typical lack of data to meet CRHR criteria. However, the nature of the isolated resource and any available ethnographic data regarding affiliated Native American populations should be carefully considered during the evaluation process, particularly as it relates to potential eligibility under Criterion 4.

Assembly Bill 52

The Native American Historic Resource Protection Act (Assembly Bill [AB] 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to TCRs into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact, requiring feasible mitigation measures.

TCRs must have certain characteristics:

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (PRC Section 21074[a][1])
2. The lead agency, supported by substantial evidence, chooses to treat the resource as a TCR. (PRC Section 21074[a][2])

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it supports its determination with substantial evidence and considers the resource's significance to a California tribe. The following is a brief outline of the process (PRC Section 21080.3.1–3.3).

1. A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
3. A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
6. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance (California Office of Historic Preservation 2025a). The resource must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks. A resource must meet at least one of these following criteria:

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value (California Office of Historic Preservation 2025b). Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a point. If a point is subsequently granted status as a landmark, the point designation is retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- Be the first, last, only, or most significant of its type within the local geographic region (city or county).
- Be associated with an individual or group having a profound influence on the history of the local area.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or be one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

4.0 RESEARCH

Ethnographic Setting

The proposed Project area is located within the ancestral territory of the Gabrieleño/Tongva (Kroeber 1925). Although Alfred Kroeber recorded the territories of southern California tribes in 1925, the ancient territorial borders remain inexact for two reasons. First, territorial boundaries were flexible. Secondly, indigenous borders and land use were not recorded until after European settlements displaced many Native American communities. Although firm and defining borders cannot be known, archaeological, ethnographic, and historic evidence exists to support the prehistoric use by the First Peoples of Los Angeles.

The Gabrieleño/Tongva have a rich and diverse material culture, traditionally including shell set in asphaltum, carvings, painting, baskets, an extensive steatite industry, and a wide range of stone, shell, and bone materials. At the time of European colonization, they inhabited numerous permanent villages in fertile lowlands along waterways in sheltered areas along the coast, each of which held a population in the low hundreds. Smaller villages were also located at varying distances from these permanent villages, all of which were highly connected via economic, religious, and social ties (Bean and Smith 1978). Villages contained circular and domed homes made of tule mats, fern, or carrizo, as well as small, circular earth-covered sweathouses (Bean and Smith 1978; Kroeber 1925). Their hunting and gathering subsistence strategy included land and offshore efforts that resulted in the take of both small and large land animals, sea mammals, river and ocean fish, and a variety of plant resources. The population sometimes migrated between villages on a temporary basis throughout the year, returning to their permanent villages for ceremony or when resources needed to be replenished. Some historical villages in the region included *Maawnga* in the Glendale Narrows, *Totongna* and *Kawengna* in the San Fernando Valley, *Hahamongna* northeast of Glendale, and *Yaanga* and *Geveronga* located in the vicinity of Downtown Los Angeles (Hudson and Blackburn 1982).

Records show that the long history of European colonization and harmful displacement of Native Americans initially began in 1542 as a result of Juan Rodríguez Cabrillo visiting the area during exploration. Following many subsequent Spanish visits to the region, the colonization of the indigenous population continued in 1769 around the same time as the establishment of Missions San Gabriel in 1771 and San Fernando in 1797. Due in part to the introduction of new diseases, as well as the harsh conditions of mission life, the indigenous population quickly dwindled and cultural practices were lost. Following the secularization of the missions, most surviving Gabrieleño/Tongva became wage laborers on the ranchos of Mexican California. Gabrieleño/Tongva populations were significantly impacted by a smallpox outbreak in the 1860s. The combination of removal, murder, disease, forced labor, and poor diet contributed to the harmful diaspora of the Gabrieleño/Tongva from established villages to scattered areas of the Los Angeles Basin for survival (Bean and Smith 1978). This history of displacement within their own ancestral lands has led to difficulty in attaining federal recognition. However, the 20th century found a revitalization of the Gabrieleño/Tongva people and culture, and though the communities remain unrecognized by the Federal government, they remain a very active people in the Los Angeles area today.

Environmental Setting

In its current condition, the Project area and vicinity are entirely developed and there is no native vegetation or visible native soil. However, it historically contained a unique and diverse climate and environment. This regional diversity provided the local Gabrieleño/Tongva the ability to exploit a range of different plants, animals, and natural resources, as described above. The Los Angeles River is located approximately 3.5 miles to the east and the Pacific Ocean is 15 miles to the west, though drainages and smaller waterways were originally situated around the terrace upon which the Project area resides (U.S. Geological Survey 2025). That said, there are no permanent bodies of water within the immediate vicinity of the Project area, and proximity to water was an important consideration for Gabrieleño/Tongva habitation in the prehistoric period. Geologically, it is currently mapped as an urban environment within the Los Angeles Basin (or floodplain) underlain by late Pleistocene-age (2.5 million to 11,0000 years ago)

alluvium (Qae) made up of clay, sand, and gravel that is slightly elevated and dissected (Dibblee and Ehrenspeck 1991). In general, the Los Angeles Basin consists of Pleistocene-age to more recent Holocene-age alluvium that has been redeposited from the surrounding California Transverse Ranges via several flood events. Geologic maps also indicate that the Project area is situated in the Los Angeles City Oil Field (**Figure 3**). The oil field was documented as a single geologic unit from the Miocene-age Puente Formation. The formation is covered by a thin layer of Pliocene- and Pleistocene-age alluvium and terrace deposits. Human occupation took place in the Holocene and late Pleistocene epochs. As such, late Pleistocene geologic units such as those within the Project area typically have a low to moderate potential for archaeological resources at surface or near surface level (U.S. Geological Survey 2025).

A geotechnical subsurface investigation was conducted for the Project area by Geotechnologies, Inc. in 2025, which consisted of two borings to depths of 30 feet below ground surface (bgs). Fill soils were encountered subsurface to depths of approximately seven feet bgs. Older alluvium native soil was encountered below the fill at approximately seven feet bgs to depths of 25 feet bgs. The geotechnical report described the native soil as clayey silt and silty clay, silty sand, sand, and gravelly sand, which are predominantly dark grayish brown to yellowish and reddish brown in color, moist, stiff, dense to very dense, and fine to coarse grained. Bedrock from the Puente Formation was encountered at approximately 25 feet bgs (Geotechnologies 2025).

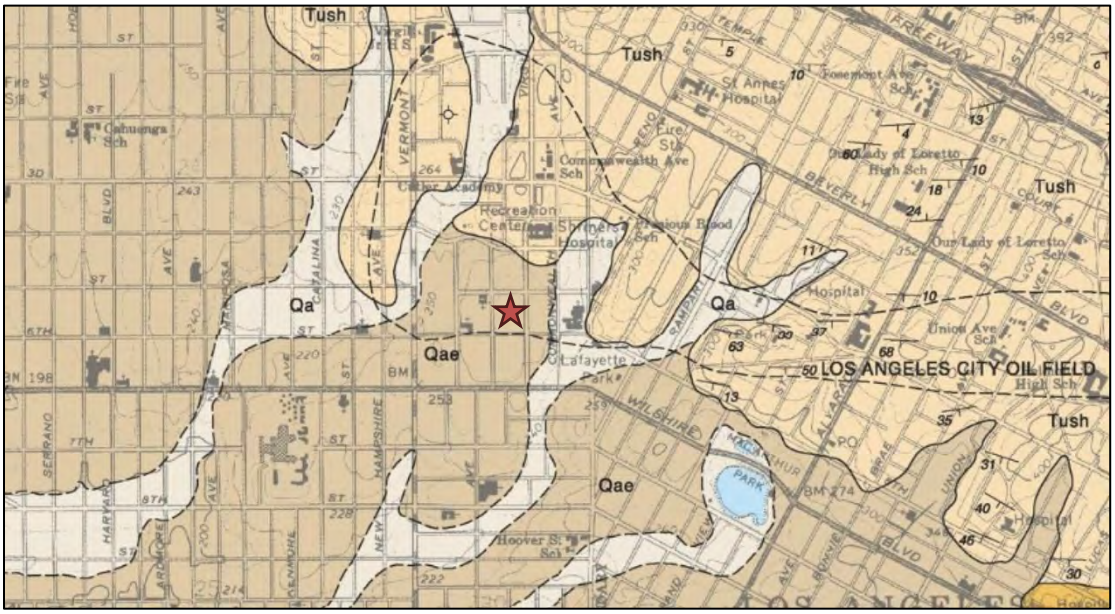


Figure 3: Geologic Map of the Project Area (Project Indicated with Red Star)

Archaeological Framework

Theoretical archaeological frameworks for southern California archaeology are frequently debated and refined by archaeologists. The early models proposed by Wallace (1955, 1978) and Warren (1968) continue to be incorporated into cultural studies with revisions. Archaeologists have developed the

cultural frameworks in southern California by generally relying on relative dating methods using diagnostic artifacts as opposed to absolute dating due to a lack of chronometric data available in the regional record. The framework proposed by Wallace introduced the Early, Millingstone, Intermediate, and Late Prehistoric Periods, which follow the geologic time scale of the Early, Middle, and Late Holocene

Early Holocene (12,000-7500 calibrated years Before Present (cal BP))

A gradual warming of the environment occurred during the Early Holocene. Researchers have proposed that groups from the Early Holocene were highly mobile and traveled across wide ranges, and identified archaeological resources were materials/tools that were portable or expedient to accommodate mobility. Archaeologists have also recorded artifacts associated with hunting and plant processing at early Holocene sites, such as projectile points, bifaces, and groundstone tools. For the coastal communities, such as the Gabrieleño/Tongva, it is likely that a rise shorelines as a result of warming further added to the need for regularly mobility and associated resource exploitation of portable materials. It is also likely they utilized both marine and terrestrial resource, such including the utilization of large mammal carcasses. Some of the earliest archaeological evidence in the region dates to 11,000 years ago and is located is within Gabrieleño/Tongva territory in the California Channel Islands, which is located off the coast of the Los Angeles Basin.

Middle Holocene (7500-3500 cal BP)

The Millingstone Period during the Middle Holocene is characterized by new artifact types, specifically those of milling category of resource, such as manos and metates. The warming of the environment resulted in adaptations to changing environments and associated plant and animal resources. Temporary and seasonal camps were utilized during the Middle Holocene and tools were intentionally cached for later use as the Gabrieleño/Tongva returned to specific sites over time. In general, the period is charactered by less dependence on constant mobility and a more sedentary lifestyle, though evidence still points to the utilization of different areas based on seasonality and weather. Larger settlements appeared to be closer to the coastline and other bodies or water that allowed for abundant coastal resources, though smaller settlements have been recorded across the inland areas along smaller creeks and streams. As a result of longer and more consistent uses, archaeological sites in this period are also characterized by the emergence of thick midden deposits, cooking features, and materials indicated the early stages of trade with neighboring groups.

Late Holocene (3500 cal BP through Historic Contact)

Archaeological sites from the Late Holocene contain increasingly diverse artifact assemblages. Increased population is evident, and multiple family groups likely coexisted within Gabrieleño/Tongva communities. Proximity to water remained an important factor for the seasonal and permanent settlements. Late Prehistoric archaeological sites contained diverse artifact assemblages, including projectile points, ceramics, pendants, incised stones, and shell beads. An increase in hunting efficiency occurred during the Late Prehistoric Period and Protohistoric Period, which is evident by the emergence of bow and arrow technology. An abundance of bedrock mortars and pestles have been recorded at village sites and further indicate a continued transition towards long-term sedentary habitation. Burial sites showcase an increase

in ornamental materials, and other archaeological assemblages with ornamental materials showcase evidence of increased trade and more elaborate cultural practices. The end of this period is marked by the early arrival of the Spanish in the 1500s and later, more consistent Spanish settlement during the 1700s.

Record Searches

In September 2025, Kimley-Horn conducted a cultural resource record search at the SCCIC and submitted an SLF search request to the NAHC as a part of preparation of the *Archaeological Resources Assessment for the 525 South Virgil Avenue Project in the City of Los Angeles, Los Angeles County, California* finalized in December 2025.

The NAHC noted that there are no SLFs on file with the NAHC within or adjacent to the Project area. A copy of the results is included in **Appendix A** of this report. The records at the SCCIC indicated that one (1) previous cultural study (LA-05074) was conducted in the Project area, but that no cultural resources were recorded within the Project area or within the half-mile radius. Additionally, Kimley-Horn reviewed available national, state, and local registers, though no resources were identified within the Project area as a result of this review.

Historical Imagery

Kimley-Horn reviewed a database of historic maps and aerial imagery for the Project area to determine the land use history, extent of previous development, and potential for intact archaeological resources to be identified. Historic aerial imagery is available for the Project area from 1948 through present, and historic topographic maps are available from 1894 through present (Historic Aerials 2025). The earliest maps indicate that roads were developed in the Project vicinity before 1894. A large building was constructed in the Project area and adjacent parcels before 1928 (**Figure 4**). The building was demolished, and residential buildings were constructed between 1928 and 1948. The residences were demolished between 1954 and 1964 and replaced with a parking lot. A commercial building was constructed in the Project area in 1965. In summary, the Project area was developed before 1928 and has undergone extensive demolition and new construction since that time.

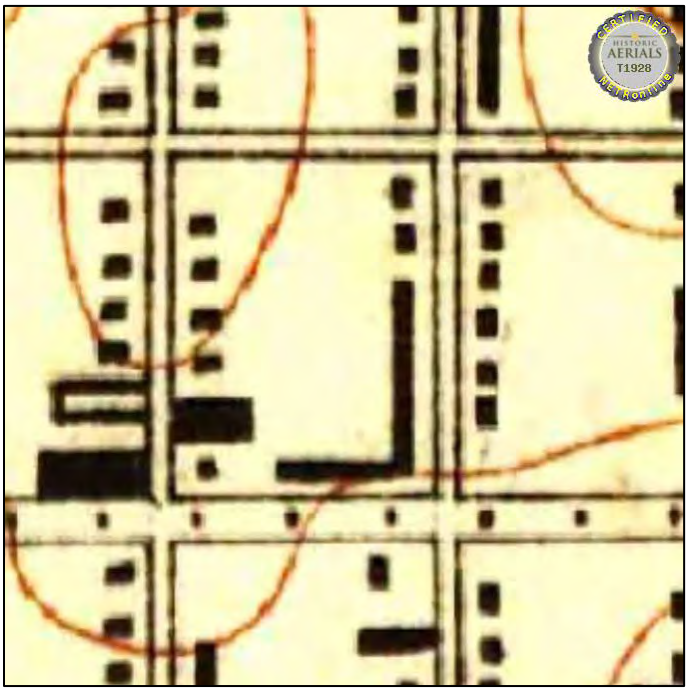


Figure 4: Topographic Map of the Project Area in 1928

5.0 TRIBAL CONSULTATION

In compliance with AB 52, the Los Angeles Department of City Planning submitted Project notification letters on May 27, 2026, to tribal group representatives identified on the City AB 52 contact list for the Project location. Letters were sent via certified mail to the following California Native American tribes that requested notification: the Fernandeño Tataviam Band of Mission Indians, the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino-Tongva Indians of California, the Gabrielino-Tongva Nation, the Gabrielino-Tongva San Gabriel Band of Mission Indians, the Gabrielino-Tongva Tribe/Nation, the San Fernandeño Band of Mission Indians, and the Torres Martinez Desert Cahuilla Indians.

One representative, Chairman Andrew Salas of the Gabrieleño Band of Mission Indians – Kizh Nation (or Kizh Nation), responded to City Planning's Project notification letter within the required 30-day response period via electronic mail (e-mail) on May 28, requesting a consultation meeting. No other tribal group representatives requested consultation with City Planning for the Project under AB 52. After a few months of deliberation on scheduling a consultation date, on July 22, 2026, the representative from the Kizh Nation informed staff that consultation via email would be the most efficient method to conduct the tribal consultation. Staff confirmed and agreed to conduct the consultation virtually via email.

On August 3, 2026, the Kizh Nation provided documentation and maps regarding the archaeological and historic context of Wilshire and the surrounding areas and documentation which establishes Los Angeles as the tribe's ancestral territory, as well as their requested mitigation measures to ensure the protection of significant cultural resources. Based on the response letter from the Kizh Nation, the tribe concluded that the project area possesses a high sensitivity for Tribal Cultural Resources. Those mitigation measures have been incorporated as MM TCR-1, MM TCR-1a, and MM TCR-1b.

6.0 DISCUSSION

As previously noted, TCRs can involve a wide range of resources including prehistoric village sites, ceremonial centers, and burial sites, as well as natural resources such as rivers, mountain ranges, and springs, as well as intangible resources such as viewsheds. According to PRC Section 21074 (a)(2), a TCR is any resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, and that the significance of the resource to a California Native American Tribe shall be considered. As lead agency for the Project, City Planning must determine, based on consultation with the tribe, whether substantial evidence exists from the documents provided as part of AB 52 consultation, for a TCR located on the Project site. As such, this Assessment serves only to supplement the Lead Agency's efforts to identify the presence of potential presence of TCRs.

A review of records housed by the SCCIC and NAHC results, as well as national, stare, and local registers, did not identify any known archaeological or cultural resources, or any known sacred sites. A review of historical and topographic maps and imagery, as well as geological soil information for the Project area, indicates a low likelihood of present tangible TCRs. The Project area is not near any major water resource, nor is it located to any natural resource publicly known to hold tribal sensitivity. Additionally, imagery and records show the Project area has been subject to extensive disturbances since its original development as early as 1928. Geotechnical investigations noted fill soils were encountered subsurface to depths of approximately seven feet bgs, and that older alluvium native soil was encountered below the fill were located approximately seven feet bgs to depths of 25 feet bgs. The geotechnical report described the native soil as clayey silt and silty clay, silty sand, sand, and gravelly sand, which are predominantly dark grayish brown to yellowish and reddish brown in color, moist, stiff, dense to very dense, and fine to coarse grained. As this early soil predates human occupation, it is unlikely to contain any intact archaeological or natural resources original to the Project area. It is also important to note that the proposed maximum depth of excavation for the Project is approximately six to eight feet bgs. As such, excavation is expected to occur almost entirely in previously disturbed sediments/an artificial fill layer.

Based on review of all materials provided by Chairman Salas during consultation regarding the archaeological and historic context of Wilshire and the surrounding areas and documentation which establishes Los Angeles as the tribe's ancestral territory.

7.0 RECOMMENDATIONS

Based on consultation with Kizh Nation, the City of Los Angeles has concluded that the Project area posses high sensitivity for cultural resources. Therefore, the City has adopted Mitigation Measures (MMs) recommended by Kizh Nation to address the inadvertent discovery of a TCR. In the event that a TCR is inadvertently discovered during Project development activities, the Project Applicant would be required to comply with the Project MMs for the treatment of inadvertent TCR discoveries. Project MMs, as provided below as **MM TCR-1**, **MM TCR-1a**, and **MM TCR-1b**, address retention of a Native American monitor prior to ground disturbing activities, unanticipated discovery of Tribal Cultural Resource objects,

and unanticipated discovery of human remains and associated funerary or ceremonial objects. With mitigation measures in place any impacts to TCRs would be less than significant.

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the early commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-1a: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

- a. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-1b: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- d. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

8.0 REFERENCES

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APPENDIX A

NAHC SLF Results

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Isaac Bojorquez
Ohlone-Costanoan

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Sara Dutschke
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COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

COMMISSIONER
Vacant

ACTING EXECUTIVE SECRETARY
Michelle Carr

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

September 10, 2025

Christina Livingston
Kimley-Horn and Associates, Inc.

Via Email to: Christina.Livingston@kimley-horn.com

Re: 525 S. Virgil Avenue Project, Los Angeles County

To Whom It May Concern:

As requested, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes that are traditionally and culturally affiliated with the project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

If within two weeks of notification, a response has not been received, the Commission requests that you follow up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) information center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
9/10/2025

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		besparza@cahuilla-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	6/28/2023
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		anthonymad2002@gmail.com	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	6/28/2023
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	(951) 763-2808	chair@cahuilla-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	2/1/2024
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	8/18/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	8/18/2023
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	(626) 286-1262	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	12/4/2023
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761		christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/16/2023
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/28/2023
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351		tongvatcr@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	5/30/2023
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		Chavez1956metro@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	5/30/2023
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	vminott@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	4/8/2024
Santa Rosa Band of Cahuilla Indians	F	Mercedes Estrada, Cultural Director	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	mestrada@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	5/21/2025
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	sestrada@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	4/8/2024
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed 525 S. Virgil Avenue Project, Los Angeles County.

Record: PROJ-2025-005073
Report Type: List of Tribes
Counties: Los Angeles
NAHC Group: All