

5.18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project 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:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.18.1. Setting

Tribal Cultural Resources (TCRs) is a class of resources defined under Assembly Bill 52 (AB 52). TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a California Native American tribe (Tribe). To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the California Register of Historical Resources (CRHR) or other local historic register; or (2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC §21074). AB 52 also states that tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of TCRs within their traditional and cultural affiliated geographic areas. Therefore, the identification and analysis of TCRs should involve government-to-government tribal consultation between the California Environmental Quality Act (CEQA) lead agency and interested tribal groups and/or tribal persons. (PRC § 21080.3.1(a)).

Additionally, Senate Bill 18 (SB 18) was enacted in 2004 to ensure that local governments (cities and counties) consult with California Native American tribes during the adoption or amendment of general plans or specific plans, or when designating open space. The goal is to protect tribal cultural places that may be affected by land use planning decisions. SB 18 applies to this project as the City would need to amend the General Plan in order for the Project to be built at the proposed location. Thus AB 52 and SB 18 were conducted concurrently for this Project.

5.18.1.1. Approach to Analysis of Tribal Cultural Resources

Information presented in this section was gathered through AB 52 and SB18 government-to-government consultation between the City of Goleta (City) and the California Native American Tribes that have cultural affiliations with the proposed Project site and that have requested to consult on the proposed Project and those that are within the City’s jurisdiction and potentially affected by the General Plan Amendment. Supplementary information was gathered from the cultural resources literature and records search, cultural resources field survey, Native American Heritage Commission (NAHC) Sacred Lands File search, and ethnographic summary that was described in Section 5.5 (Cultural Resources).

Project Notification

The City submitted a local government tribal consultation request to the Native American Heritage Commission (NAHC) on November 13, 2024, and received a response on November 21, 2024 with a list of contacts. On December 18, 2024, the City contacted ten representatives from six tribal groups with ancestral and cultural connection to the Goleta area via email and certified mail. The tribal groups contacted were the Barbareño Band of Chumash Indians, Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, and the Santa Ynez Band of Chumash Indians. The consultation request letters included information about the Project, lead agency contact information, project location map, and a request for response within 90 days to accommodate the response timeline for SB 18.

AB 52 and SB 18 Tribal Consultation

Per AB52 and SB18, Tribal consultation letters were mailed via certified mail December 18 to the following tribes: Barbareño Band of Chumash Indians, Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, and the Santa Ynez Band of Chumash Indians. Consultation with the Santa Ynez Band of Chumash Indians was conducted on December 27, 2025. The consultation period ended on March 18, 2025

5.18.2. Regulatory Background

Local

City of Goleta. The City of Goleta Historic Preservation & Archaeological and Tribal Cultural regulations are codified as Chapters 17.33 and 17.43 of the Goleta Municipal Code (Ordinance No. 22-05) which established a Historic Preservation Commission (Section E) and a Historic Resources Inventory and seven local Landmark designations (Section G), as well as establishing standards for the protection of Archaeological Resources and Tribal Cultural Resources within the City of Goleta (Section H).

The definition adopted as part of Ordinance No. 22-05, defines an Archaeological Resource is “An artifact, object, or site constituting material remains of past human life or activities”; and Tribal Cultural Resources “...include Native American archaeological sites and area of natural landscape that have traditional cultural significance. Further, pursuant to Public Resources Code 21074(a), a resource that consists of unique or non-unique sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are:

- (a) Included in or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR);
- (b) Included in a local register of historical resources; or
- (c) Determined by the lead agency, in its discretion and supported with substantial evidence, to be significant on the basis of criteria for listing in the CRHR after the lead agency takes into consideration the significance to the Tribe(s)” (City of Goleta Ordinance No. 22-05, 2022).

5.18.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

The Project would be considered to have a significant impact on Tribal Cultural Resources if it were to cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in the checklist above (Section 5.18). Additional thresholds are contained in the County of Santa Barbara’s *Environmental Thresholds and Guidelines Manual* (2021), which have been adopted by the City of Goleta. The City’s adopted thresholds indicate that a project would result in a significant impact on a cultural

resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired. The physical demolition, destruction, relocation or alteration of a resource or its immediate surroundings would constitute a substantial adverse change to the resource; therefore, the City's adopted thresholds are considered in the following Impact Analysis.

Impact Analysis

(a) Would the project 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:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

NO IMPACT. There are no known Tribal Cultural Resources listed or eligible for listing in the state or local register of historical resources in the Project site. Therefore, no impacts would occur.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Although there are no known Tribal Cultural Resources determined by the City to be a TCR located within the Project site, ground disturbance associated with the Project could result in unanticipated discoveries of resources that could be considered a TCR. If these resources were to be exposed or destroyed, it would constitute a significant impact. Implementation of Mitigation Measures (MM) C-1 through C-3 outlined in Section 5.5 (Cultural Resources) would reduce impacts to buried unknown resources to a less than significant level.

(b) Would the project result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired?

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. Consultation efforts did not identify any known TCRs or traditional tribal cultural places (TTCP; under SB 18) in the Project site, thus no known resources would be impacted. However, ground-disturbing activity, such as grading, trenching, or excavations, has the potential to impact the significance of an unknown buried resource, should that resource be considered a TCR or TTCP. Implementation of MMs C-1, C-2, and C-3 outlined in Section 5.5 (Cultural Resources) would reduce impacts to unknown resources to a less than significant level.

5.18.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would result in potentially significant impacts to tribal cultural resources. However, with implementation of mitigation measures C-1 through C-3 (see Section 5.5, Cultural Resources for full text), impacts would be reduced to a less than significant level.