

4.4 CULTURAL AND TRIBAL RESOURCES

4.4.1 METHODOLOGY

This Draft EIR section addresses the potential impacts of the implementation of the Inglewood Oil Field Specific Plan (Project) to cultural (archaeological and historic); paleontological resources; and tribal cultural resources located on the Project Site. The potential environmental impacts to these resources that could result from the Project's Maximum Buildout Scenario are analyzed at a project-level of detail. Direct, indirect, and cumulative impacts are addressed for each threshold criterion below, and growth-inducing impacts are described in Sections 6.0, CEQA-Mandated Analyses.

Throughout this Draft EIR, the City's portion of the Inglewood Oil Field (77.8 acres) is referred to as the "Project Site" or the "City IOF". The entire surface boundary limits of the Inglewood Oil Field, including lands within both the City and County, is referred to as "Inglewood Oil Field". The off-site portion of the Inglewood Oil Field that is within the jurisdiction of the County of Los Angeles is referred to as the "County IOF".

A records search and literature review was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton for the entire Project Site. The results of the records search indicate that seven archaeological studies have been conducted near the Project Site. Of those, one included the entire Project Site.

The records search further indicates that at least 15 archaeological sites have been recorded near, but not on, the Project Site. One of those—CA-LAN-2966—a prehistoric site, appears to be situated near the northern Project Site boundary. Its precise location and present condition is not known. Because the Project Site consists of privately owned property that is currently operated by a private company, an on-site survey was not conducted.

A Phase I Historic Evaluation of the Project Site was conducted by Pam Daly of Daly & Associates. The investigation of the Project Site included an aerial inspection of the built environment resources located within the Project Site boundaries; a search through selected California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) records of wells located within the Inglewood Oil Field; and a review of available information regarding the equipment and structures commonly found in a producing oil field. The purpose of the Phase I-level study was to ascertain if there is the potential for any of the built-environment resources in the area of potential effect (APE) to be considered historic resources, and if those resources would suffer substantial adverse changes as a result of future activities in the City IOF (Daly & Associates 2015). Appendix D contains the cultural resources supporting documentation.

4.4.2 ENVIRONMENTAL SETTING

Natural Setting

The Project Site is located largely in the Baldwin Hills, of which the northern and eastern portions are the last, large undeveloped areas in the 127-square-mile Ballona Creek Watershed in Los Angeles County. Water from the hills drains into the adjacent Ballona and Centinela Creeks, which join the Pacific Ocean four miles downstream. Covering over two square miles of ridgelines and steep canyons in the middle of a densely urbanized area, the Baldwin Hills are an example of the vast system of scrub and grassland habitats that once covered this area. The Inglewood Oil Field has been developed in the southern and western portions of the Baldwin Hills. These areas have been intensely graded and drilled, and developed into the Oil Field that exists there today.

4.4.3 CULTURAL SETTING

Prehistoric Background

Several chronologies are generally used to describe the sequence of the later prehistoric periods of Southern California. William Wallace (1955) developed the first comprehensive California chronologies and defines four periods for the southern coastal region.

Wallace's synthesis is largely "descriptive and classificatory, emphasizing the content of archaeological cultures and the relationships among them" (Moratto 1984:159). Wallace relies on the concept of "cultural horizons", which are generally defined by the temporal and spatial distribution of a set of normative cultural traits, such as the distribution of a group of commonly associated artifact types. As a result, his model does not allow for much cultural variation within the same time period, nor does it provide precise chronological dates for each temporal division. Nonetheless, although now more than 50 years old, the general schema of the Wallace chronology has provided a general framework for Southern California prehistory that remains valid today.

Horizon I: Early Man or Paleo-Indian Period (11,000 BCE¹ to 7,500 BCE). While Wallace (1955) initially termed this period the Early Man Horizon (I), this early stage of human occupation is commonly referred to as the Paleo-Indian Period today (Chartkoff and Chartkoff 1984:24). The precise start of this period is still a topic of considerable debate. At inland archaeological sites, the surviving material culture of this period is primarily lithic, consisting of large, extremely well made stone projectile points and tools such as scrapers and choppers. Encampments were probably temporary, located near major kills or important resource areas.

Horizon II: Milling Stone Assemblages (7,500 BCE to 1,000 BCE). Encompassing a broad expanse of time, the Milling Stone Period was named for the abundant millingstone tools associated with sites of this period. These tools, the mano and metate, were used to process small, hard seeds from plants associated with shrub-scrub vegetation communities. An annual round of seasonal migrations was likely practiced, with movements coinciding with ripening vegetal resources and the periods of maximal availability of various animal resources. Along the coast, shell midden sites are common site types. Some formal burials, occasionally with associated grave goods, are also evident. This period of time is roughly equivalent to Warren's (1968) Encinitas Tradition. Warren (1968) suggests that, as millingstones are common and projectile points are comparatively rare during this period of time, hunting was less important than the gathering of vegetable resources.

More recent studies (Koerper 1981; Koerper and Drover 1983) suggest that a diversity of subsistence activities, including hunting of various game animals, were practiced during this period. At present, little is known about cultural change during this time period in Southern California. While this lack of noticeable change gives the appearance of cultural stasis, almost certainly many regional and temporal cultural shifts did occur. Future research that is focused on temporal change within the Milling Stone Period would greatly benefit the current understanding of Southern California prehistory.

Horizon III: Intermediate Cultures (1,000 BCE to 750 CE²). The Intermediate Period is identified by a mixed strategy of plant exploitation, terrestrial hunting, and maritime subsistence. Chipped

¹ BCE is defined as "Before Common Era" and generally refers to that time period commonly referred to as "Before Christ" (B.C.).

² CE is defined as "Common Era" and generally refers to that time period commonly referred to as "annō Domini" (A.D.).

stone tools (e.g., projectile points) generally decrease in size, but increase in number. Abundant bone and shell remains have been recovered from sites dating to these time periods. In coastal areas, the introduction of the circular shell fishhook and the growing abundance of fish remains in sites over the course of the period suggest a substantial increase in fishing activity during the Intermediate Horizon. It is also during this time period that mortar and pestle use intensified dramatically. The mano and metate continued to be in use on a reduced scale, but the greatly intensified use of the mortar and pestle signaled a shift away from a subsistence strategy based on seed resources to that of the acorn. It is probably during this time period that the acorn became the food staple of the majority of the indigenous tribes in Southern California. This subsistence strategy continued until European contact. Material culture became more diverse and elaborate and included steatite containers, perforated stones, bone tools, ornamental items, and asphalt adhesive.

Horizon IV: Late Prehistoric Cultures (750 CE to 1769 CE). During the Late Prehistoric Period, exploitation of many food resources, particularly marine resources among coastal groups, continued to intensify. The material culture in the Late Prehistoric Horizon increased in complexity in terms of the abundance and diversity of artifacts being produced. The recovery and identification of a number of small projectile points during this period likely suggests a greater utilization of the bow and arrow, which was likely introduced near the end of the Intermediate Period. Shell beads, ornaments, and other elements of material culture continue to be ornate, varied, and widely distributed; the latter evidence suggests elaborate trade networks. Warren's (1968) scheme divides the late prehistoric period into several regional traditions. Western Riverside County, Orange County, and the Los Angeles Basin area are considered part of the "Shoshonean" tradition, which may be related to a possible incursion of Takic speakers into these areas during this period. The Late Prehistoric Period includes the first few centuries of early European contact (1542–1769 CE); it is also known as the Protohistoric Period as there was a low level of interaction between native Californians and Europeans prior to Portolá's overland expedition in 1769.

In the few centuries prior to European contact, the archaeological record reveals substantial increases in the indigenous population (Wallace 1955:223). Some village sites may have contained as many as 1,500 individuals. Apparently, many of these village sites were occupied throughout the year rather than seasonally. This shift in settlement strategy was likely influenced by improved food procurement and storage technology, which enabled population growth and may have helped stimulate changes in sociopolitical organization.

Evidence is growing that prehistoric cultural change has been much more variable through time and across culture areas than previously thought. Cultural traits such as maritime economies, seafaring, complex trade networks, and year-round occupation of villages appear to have developed much earlier than previously thought. Culture change during the Late Prehistoric Period, in particular, may have been driven more by environmental and resource pressures than optimal adaptation to the environment (Byrd and Raab 2007).

Ethnographic Background

At the time of European contact, the Baldwin Hills area was the home of the Gabrielino. The Gabrielino are those people and their descendants who became associated with Mission San Gabriel Arcángel, which was established in south-central Los Angeles County on September 8, 1771, in what has ever since been called the San Gabriel Valley. Today, these people are sometimes referred to as the Tongva, although the term apparently originally (i.e., before the arrival of Euro-Americans) referred to the inhabitants of the San Gabriel Valley only. In either case, the inhabitants of Santa Catalina Island and San Clemente Island are often included as

being parts of this tribe, as are the Fernandeño, who inhabited most of the San Fernando Valley. Note that Chester King distinguishes between the Eastern Gabrielino, who lived south of the San Gabriel Mountains, mainly in the San Gabriel Valley, and the Western Gabrielino, who lived along the western coast of Los Angeles County, from Malibu to Palos Verdes, and included the people living in the San Fernando Valley (King 2003:14).

The ancestral Gabrielino arrived in the Los Angeles Basin probably before 500 BCE as part of the so-called Shoshonean (Takic speaking) Wedge from the Great Basin region and gradually displaced the indigenous peoples, probably Hokan speakers. Large, permanent villages were established in the fertile lowlands along rivers and streams and in sheltered areas along the coast. Eventually, Gabrielino territory encompassed the watersheds of the Los Angeles, San Gabriel, Rio Hondo, and Santa Ana Rivers, which includes the greater Los Angeles Basin, to perhaps as far south as Aliso Creek, as well as portions of the San Fernando, San Gabriel, and San Bernardino Valleys. Gabrielino territory also included the islands of San Clemente, San Nicholas, and Santa Catalina (McCawley 1996: 23–24; Bean and Smith 1978:538–540). Recent studies suggest the population may have numbered as many as 10,000 individuals at their peak in the Pre-Contact Period.

The subsistence economy of the Gabrielino was one of hunting and gathering. The surrounding environment was rich and varied, and the natives were able to exploit mountains, foothills, valleys, deserts, and coasts. As was the case for most native Californians, acorns were the staple food (by the Intermediate Horizon), supplemented by the roots, leaves, seeds, and fruit of a wide variety of flora (i.e., cactus, yucca, sage, and agave). Fresh and saltwater fish, shellfish, birds, insects, and large and small mammals were exploited.

A wide variety of tools and implements were employed by the Gabrielino to gather, collect, and process food resources. The most important hunting tool was the bow and arrow. Traps, nets, blinds, throwing sticks, and slings were also employed. Fish were an important resource and nets, traps, spears, harpoons, hooks, and poisons were utilized to catch them. Ocean-going plank canoes and tule balsa canoes were used for fishing and for travel by those groups residing near the Pacific Ocean.

The processing of food resources was accomplished in a variety of ways: nuts were cracked with hammer stone and anvil; acorns were ground with mortar and pestle; and seeds and berries were ground with mano and metate. Yucca, an important resource in many areas, was eaten by the natives and exploited for its fibers. Strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks were also employed. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels. Gabrielino houses were circular domed structures of willow poles thatched with tule. They were actually quite large and could, in some cases, hold 50 individuals. Other structures served as sweathouses, menstrual huts, and ceremonial enclosures (Bean and Smith 1978).

Kroeber (1925:621) considered the Gabrielino:

. . . to have been the most advanced group south of Tehachapi, except perhaps the Chumash. They certainly were the wealthiest and most thoughtful of all the Shoshoneans of the State, and dominated these civilizationally wherever contacts occurred.

The Baldwin Hills is the last large undeveloped area in the Ballona Creek Watershed. According to McCawley (1996:61), the Gabrielino communities of *Saa'anga* and *Waachnga* were located in

the vicinity of the Ballona Creek near the Baldwin Hills; however, the location of *Waachnga* is disputed.

Historic Background

Post-contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848–present). Although there were brief visits by Spanish, Russian, and British explorers between 1529 and 1769, the beginning of Spanish settlement in California occurred in 1769.

Juan Rodriguez Cabrillo sailed along the California coast in 1542 and, according to available records, stopping only at San Diego and the Channel Islands, was the first European to come into contact with the Gabrielino. The first Europeans to visit the area arrived in 1769 when Gaspar de Portolá led an overland expedition from San Diego to Monterey. Mission San Gabriel in Los Angeles County was founded in September 1771, and all Native Americans from the Los Angeles Plain were persuaded to settle in its vicinity.

Although Spanish Explorers had claimed the lands of California in the 1500s, colonization only began in 1769 following a mandate from King Carlos III of Spain. The mission system was established shortly afterward by Father Junípero Serra. The Gabrielino Native Americans, who had long occupied the lands in the vicinity of Los Angeles, were so named following the completion of the San Gabriel Mission in about 1771.

The Mexican-American War ended on February 2, 1848, with the signing of the Treaty of Guadalupe Hidalgo. The treaty established California as a United States possession and provided for the retention of private lands held by the conquered Mexicans. However, in 1851, the United States required that the courts approve all Hispanic land grants. As a result, many of the land grants were not approved, and the division of many of the larger ranchos occurred.

In the 1770s, the California Mission systems were founded by Junípero Serra, who established a series of missions northward from San Diego to San Francisco, one day's horse ride apart. Mission names were often adopted to refer to Native American groups (such as "Gabrielino" derived from Mission San Gabriel). The missions controlled large areas of land until 1824, when the Mexican government declared its independence from Spain. The majority of mission lands were then secularized and distributed by land grants to specific individuals. The effects of mission influence upon the local native populations were devastating. The reorganization of their culture alienated them from their traditional subsistence patterns and social customs. European diseases, against which the natives had no immunities, reached epidemic proportions, and Gabrielino populations were decimated (Johnston 1962:135). Although most Gabrielino submitted to the Spanish and were incorporated into the mission system, some refused to give up their traditional existence and escaped into the interior regions of the state.

The Project Site and its surroundings are within the region historically occupied by Gabrielino Indians or the Tongva (Bean and Smith 1978). Most of the Gabrielino villages were abandoned around 1805 due to rapid decline from European-introduced diseases (Singer 1985). Baptismal records from Mission San Fernando and Mission San Gabriel indicate that 92 people from the village of Tujunga at the mouth of the canyon were baptized between 1783 and 1811 (Merriam 1968:102, 120; Singer 1985).

Local History

Urban Development

One of the first settlements in proximity to present day City of Culver City, El Pueblo de Nuestra Señora la Reina de Los Angeles, was established in 1781. California won its independence in 1850 following disputes between landowners, including the complexities of living under Spanish and subsequently Mexican rule and following a brief period of skirmishes. Shortly thereafter, Culver City emerged from portions of two early land grants: the 14,000-acre Rancho La Ballona and the 3,127-acre Rincon de Los Bueyes (Culver City 2017a).

In 1913, Harry H. Culver, from Milford, Nebraska, began planning the future of Culver City. He planned for the City to be near major roads, the railroad, and roughly midway between Los Angeles and Venice. The fledgling City was centered on Main Street. Streets and thoroughfares were named and the Police and Fire Departments were established. The early economic base began with the motion picture studios locating in the City. By the 1940s, Culver City had an Industrial area in addition to bakeries, night spots, and numerous other business offering various goods and services (Culver City 2017a).

Over the years, more than 40 annexations increased the size of the City to about 5 square miles. Culver City transitioned from a general law city to a charter city in 1947. In addition to City government, schools became a part of the community and, by 1949, Culver City had its own Unified School District, meaning that education was available through secondary school. The five-member elected Board of Education governs Culver City's public schools just as the five-member elected City Council governs the City. By 1971, the City Council became aware of the need for redevelopment, and formed the Culver City Redevelopment Agency. The first major project accomplished under the Redevelopment Agency was the Fox Hills Mall, which opened in 1975. By 2000, the City had quadrupled in size and became a community of nearly 40,000 residents (Culver City 2017a). On February 1, 2012, as a result of changes to the California Community Redevelopment Law (Dissolution Act), all California redevelopment agencies, including the Culver City Redevelopment Agency, were dissolved. In accordance with the Dissolution Act, the Successor Agency to the Culver City Redevelopment Agency was designated and vested with the responsibility of winding down the business and fiscal affairs of the former Culver City Redevelopment Agency.

Portions of the Project Site's surroundings, particularly west of La Cienega Boulevard, were once part of a wetlands environment associated with Ballona Creek to the north and west. Riparian plants, wild grapes, and brambles covered this area (Johnston 1962). These marshes were later drained as part of historic developments. Historic land uses in the area were dominated by oil extraction activities associated with the Inglewood Oil Field south and west of the Project Site; agriculture and commercial and residential developments are other land uses from the area (Demcak 1992).

Oil Field Development

Since 1543, oil and natural gas fields were noted as existing in the vicinity of Los Angeles. Oil was gathered from where it naturally emerged from the ground, and was used in its natural state. The shallow, hand-dug Dryden well of 1857 was the first recorded oil well in Los Angeles. Meanwhile in Titusville, Pennsylvania, Colonel Edwin Drake drilled a shallow well for crude oil in 1859, and this well would become the beginning of the commercial oil industry in the United States. Colonel Drake put in a derrick and a pump system, and sold shares of his oil exploration enterprise. It is stated about oil history that, "More than for any other purpose, crude oil at first

was refined to improve its use as an illuminant. Lighting, in itself, created the great demand for oil that led to the frantic drilling of the pioneer oil wells along Oil Creek [Pennsylvania] and elsewhere. Other uses soon increased the overall demand” (Pees 2004)

Edward Doheny and Charles Canfield dug the first well in what came to be known as the Los Angeles City Oil Field in 1892, near present day Dodger Stadium. Within a few years, the Los Angeles City Oil Field was producing over half of the oil in the state. In the early 1900s, the steam engines used by the railroad companies were being converted to using diesel-grade oil, and California became the western center of oil exploration and refining. By 1900, California became the leading oil producer in the United States, producing an estimated four million barrels of oil (DOC 2015a).

The first oil well drilled in Baldwin Hills was in 1916. The first commercial production occurred under the ownership of the Standard Oil Company of California and produced 145 barrels per day. Other early operators included the Bartolo Oil Company (1924), the Associated Oil Company (1924), and the Shell Company of California (1925). Well drilling was initially high, with 206 wells constructed in 1925, but then declined to only 35 wells the following year because, by that time, the limits of the field had been established (DOC 2015a).

During the 1930s, the oil markets were flooded and prices declined. During this period oil production and discoveries were low, with the exception of the discovery, in 1932, of the Wilmington Oil and Gas Field, which became the third largest oil field in the nation. The Great Depression slowed oil production in California, but World War II caused a resurgence that continued through the 1950s. Although pumping for oil continues today in the Los Angeles County area of Southern California, the production has never hit the quantity of the 1930s (DOC 2015a).

4.4.4 REGULATORY SETTING

Federal

National Historic Preservation Act

Cultural resources are considered during federal undertakings chiefly under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (as amended) through one of its implementing regulations (*Code of Federal Regulations* [CFR], Title 36, Part 800, Protection of Historic Properties) and the National Environmental Policy Act (NEPA). Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of the NHPA. Other federal laws include the Archaeological Data Preservation Act of 1974; the American Indian Religious Freedom Act (AIRFA) of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1989, among others.

Section 106 of the NHPA (*United States Code* [USC], Title 16, Section 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed. If there is determined to be an effect, consultation to resolve the effect is undertaken in accordance with the *Code of Federal Regulations* (36 CFR 800.6[b]). Significant cultural resources are those resources that are listed in or are eligible for listing in the NRHP per the criteria listed in the *Code of Federal Regulations* (36 CFR 60.4) below:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

- (a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) that are associated with the lives of persons significant in our past; or
- (c) that 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; or
- (d) that have yielded, or may be likely to yield, information important in prehistory or history.

A property eligible for listing in the NRHP must meet one or more of the four criteria (a–d) defined above. Unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for listing in the NRHP. According to National Register Bulletin No. 15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity”. Integrity is defined in National Register Bulletin No. 15 as “the ability of a property to convey its significance”. Additionally, a property must be significant within a historic context, referring to “those patterns, themes, or trends in history by which a specific . . . property or site is understood and its meaning . . . is made clear”. A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the NRHP.

State

California Register of Historical Resources

The Office of Historic Preservation (OHP) administers the California Register of Historical Resources (CRHR), which was established in 1992 through Sections 5020 et seq. of the *California Public Resources Code* (PRC) to be “an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1[a]).

The CRHR listing criteria focus on resources of State, rather than national, significance. The CRHR includes the following types of resources, either as an individual property or a contributor to a historic district: (1) properties listed in or determined eligible for listing in the NRHP (automatically included); (2) California Historical Landmarks numbered 770 and higher (automatically included); (3) California Points of Historical Interest recommended for listing by the OHP; and (4) resources nominated for listing and determined eligible by meeting one or more of the CRHR criteria.

The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP (per the criteria listed at 36 CFR 60.4), are stated below.

The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and

objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and that:

- (1) Are 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; or
- (2) Are associated with the lives of persons important to local, California, or national history; or
- (3) Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
- (4) Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. The minimum age criterion for the CRHR is generally 50 years. Under the Special Considerations provided in the California Code of Regulations (Title 14, Division 3, Chapter 11.5, 4852[d][2]), resources less than 50 years old may be eligible for listing if “it can be demonstrated that sufficient time has passed to understand its historical importance”.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency to determine whether a project will have a significant effect on one or more historical resources. According to Section 15064.5(a) of the State CEQA Guidelines, a “historical resource” is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (*California Public Resources Code* [PRC], Section 21084.1); a resource included in a local register of historical resources (*California Code of Regulations* [CCR], Title 14, Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR 15064.5[a][3]).

In addition, according to Section 15064.5(a)(3)(A–D) of the State CEQA Guidelines (14 CCR), a resource is considered historically significant if it meets the criteria for listing in the NRHP (per the criteria listed at 36 CFR 60.4). Impacts that affect those characteristics of the resource that qualify it for the NRHP or that would adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from a project are thus considered significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource that contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

The purpose of a cultural resources investigation is to evaluate whether any cultural resources remain exposed on the surface of a project site or can reasonably be expected to exist in the subsurface. If resources are discovered, management recommendations would be required for evaluation of the resources for NRHP or CRHR eligibility.

Senate Bill 18

Senate Bill (SB) 18 (*California Government Code*, Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies. It establishes responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the Native American Heritage Commission's (NAHC's) SB 18 Tribal Consultation List within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the *California Public Resources Code* that may be affected by the proposed adoption of or amendment to a general or specific plan.

Assembly Bill 52

AB 52 is applicable to projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR), or notice of a Negative Declaration (ND) or Mitigated Negative Declaration (MND) on or after July 1, 2015. AB 52 requires that the tribes ask the lead agency to be contacted for consultation. Then, the lead agency must contact the tribes to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project and have requested such consultation prior to determining the type of CEQA documentation that is applicable to the project. AB 52 allows Tribes 30 days after receiving notification to request consultation. The lead agency then has 30 days to initiate consultation.

Local

City of Culver City General Plan

Land Use Element

The City of Culver City General Plan's Land Use Element contains policies that address cultural resources and are relevant to the current Project as follows:

Land Use Element Policy 27.F. Assess the existence and value of biological and cultural resources within the undeveloped Blair Hills/Baldwin Hills Area.

Culver City Municipal Code

Chapter 15.05, Historic Preservation Program, of Title 15, Land Usage, of the Culver City Municipal Code (CCMC), was established "to protect the City's unique historical, architectural and cultural heritage as reflected in the City's architectural history and patterns of cultural development". The Program "is also intended to encourage and facilitate public knowledge, understanding and appreciation of the City's historic past and unique cultural resources" (CCMC, Title 15; Chapter 15.05, Section 15.05.005 Purpose).

Cultural Resource Criteria

Section 15.05.020 of the CCMC discusses the City's Cultural Resources Criteria. After the City receives an application for designation of a structure or district, the following criteria will be applied in evaluating the appropriateness of such a designation:

- A. *Threshold criteria.* To be considered for designation, the structure(s) must meet one of the following criteria:
 - 1. The structure(s) is at least fifty (50) years old and the exterior of the structure is accessible or visible to the public; or
 - 2. The structure or district has special importance to the City.
- B. *Assessment criteria.* After satisfying the threshold criteria, a structure or district shall be reviewed for compliance with one or more of the following criteria, as defined under § 15.05.010 of this Chapter:
 - 1. Is the structure(s) of "architectural significance"?
 - 2. Is the structure(s) of "historical or cultural significance"?
 - 3. Do the structures in the district collectively meet 1. or 2. above?

Section 15.05.010 of the CCMC defines the above-listed criteria as follows:

Architectural Significance. A criterion used in designating a structure that is an outstanding or surviving example of period, style, detail, unique craftsmanship or method of construction; or represents the work of a locally, statewide or nationally significant architect, designer, or builder.

Historical or Cultural Significance. A criterion used to designate a structure or district in which events occurred that made a significant contribution to City, State or national history or culture; or that involved a close association with the lives of people who made a significant contribution to the history and development of the City, State or nation.

4.4.5 SPECIFIC PLAN AND REGULATORY REQUIREMENTS

Specific Plan Drilling Regulations

Section 30 A. Archaeological Training. The Operator shall provide archeological training for all persons who will be involved with ground disturbance activities for the proposed Drilling Project. Documentation that such training has occurred shall be submitted to the Community Development Director prior to conducting any ground disturbance activities. All such persons shall be required to participate in the training and must receive training material prepared by a qualified archaeologist prior to working on ground-disturbance activities. The training material shall include, at a minimum, the following:

- 1. Review of the types of archaeological artifacts that may be uncovered;
- 2. Examples of common archaeological artifacts to examine;

3. Review of what makes an archaeological resource significant to archaeologists and local Native Americans;
4. Procedures for notifying involved or interested parties in case of a new discovery;
5. Reporting requirements and responsibilities of construction personnel;
6. Procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Procedures that shall be followed in the case of discovery of disturbed, as well as intact, human burials and burial-associated artifacts.

B. Cultural Resources Assessment.

1. Prior to conducting ground disturbance activities, the Operator shall submit a Cultural Resources Assessment to be reviewed and approved or conditionally approved by the Community Development Director. The Assessment shall be prepared by a qualified City-approved archaeologist and shall contain an archeological, cultural resources, and paleontological assessment of the proposed ground disturbance activities to determine the likelihood of identifying resources. The Assessment shall include a records search, and site reconnaissance and include recommendations for mitigating potential impacts. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other ground-disturbance activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified independent archaeologist, approved by the Community Development Director. The archeologist shall also identify whether the proposed ground-disturbance activities would require monitoring, either by the archaeologist or a Native American monitor (where appropriate) for potential archaeological resources, and the preparation of a Treatment Plan to ensure that any new discoveries are adequately recorded, evaluated, and, if significant, mitigated. If a Treatment Plan is required, it shall be submitted prior to ground-disturbance activities. The monitor will have the authority to halt earth-disturbing activities. The Treatment Plan shall be approved by the Community Development Director, and the Operator shall comply with all provisions of the Assessment. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director, that a Cultural Resources Assessment has been prepared and approved for other parts of the Inglewood Oil Field and can conclusively show that the Cultural Resources Assessment applies to the Inglewood Oil Field within the jurisdiction of the City. Additional information may be required by the Community Development Director to demonstrate compliance with this Section.
2. The Operator shall have a qualified paleontologist, approved by the Community Development Director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The monitor will have the authority to halt earth-disturbing activities. The sensitive sediments that have been identified within the Inglewood Oil Field include the Lower Pleistocene San Pedro Formation and the Inglewood Formation. Sediment samples shall be collected as deemed necessary during monitoring efforts to recover

small vertebrate fossil if they exist. Any fossils recovered during monitoring should be deposited in an accredited scientific institution in perpetuity. In the event that fossils are deposited, the paleontologist will prepare a report describing the results of the monitoring efforts, field and laboratory methods, description of are geology and paleontology, and a description of taxa recovered and analysis performed. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.

- C. Human Remains.** In the event human remains are discovered, the qualified archeologist, in consultation with the Community Development Director, shall determine disposition of the remains after consultation with the County Coroner and Native American Most Likely Descendent, in accordance with California Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e).

Regulatory Requirements

Applicable regulatory requirements are adequately referenced and incorporated into the Drilling Regulations, as discussed above.

4.4.6 THRESHOLDS OF SIGNIFICANCE

Thresholds Addressed in the Initial Study

The Initial Study prepared for the Project (included in Appendix A-1) concludes that the Project would have no impact on the following threshold, and further analysis of this threshold is not required in the Draft EIR:

- Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Thresholds Addressed in this Environmental Impact Report

The Initial Study for the Project concludes that additional project-level analysis of the following thresholds of significance is required in this Draft EIR. According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would have a significant adverse environmental impact on aesthetics if it would:

- Threshold 4-1:** Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
- Threshold 4-2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- Threshold 4-3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Subsequent to the issuance of the Initial Study for the Project, the California Natural Resources Agency released a revised proposal to update Appendix G of the CEQA Guidelines related to tribal cultural resources. As such, the following threshold is included:

Threshold 4-4: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

4.4.7 IMPACT ANALYSIS

Threshold 4-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The investigation of the Project Site was based upon an aerial inspection of the built environment resources located within the City IOF by the use of Google Earth aerial view; a search through selected DOGGR records of wells located on the Inglewood Oil Field; and a review of available information regarding the equipment and structures commonly found in a producing oil field.

In general, producing oil fields tend to have the same assortment of structures and features located in areas of operation used to extract, pump, distribute crude oil, and inject produced water and have buildings and structures that provide on-site support space such as a field office, a maintenance shed, storage sheds for motor equipment and surplus pipes, concrete pads, fencing, outdoor light fixtures, and holding tanks/tank farms. A review of aerial surveys of the City IOF did not show any structures or equipment that are considered out-of-the-ordinary or that are not considered to be ubiquitous features associated with an oil field operation. The buildings, sheds, oil tanks, pump jacks, and other equipment of the City IOF are commonly found on other producing oil fields in California.

The City IOF was reviewed against the City's criteria required for designating Cultural Resources. To be considered for designation, the resource must be over 50 years old and have a special importance to the City. Drilling began in the Inglewood Oil Field in the 1920s and it was considered part of the larger Long Beach Oil Fields District 1: Cypress. Information available from DOGGR provided in Table 2-2 in Section 2.0, Environmental Setting, of this Draft EIR, shows that the majority of the wells were installed around 1976. However, some wells have unconfirmed installation dates (which is confidential information), and the dates provided may not reflect the initial year of drilling. As such, it is possible that some wells in the City IOF are older than 50 years, and it is possible that some wells will reach the 50-year mark within the life of the Project.

The City IOF does not appear eligible for listing in the NRHP and/or the CRHR under criterion a/1. The City IOF is just one of many similar producing oil fields that were installed all through Central and Southern California during the boom period of the 1920s and 1930s. While the exploration and pumping of oil did play a part in the history of the settlement of Culver City in the early 20th century, it did not play a pivotal role in the City's history, unlike the film industry and

Hughes Aircraft Company. Research did not reveal that the City IOF was considered any more important than any other of Los Angeles County's oil fields, or that the Inglewood Oil Field represented any technologic advancement or engineering knowledge in the crude oil pumping process (Daly & Associates 2015). The built environment resources specifically located within the City IOF do not appear to be eligible for having made a significant contribution to the broad pattern of the exploration of crude oil in the history of California, Los Angeles County, or Culver City.

Eligibility under the NRHP and/or CRHR under criterion b/2 is related to being directly associated with the lives of persons significant in the history of crude oil in Los Angeles County or California. The City IOF does not appear to be eligible for listing in the NRHP or CRHR under criterion b/2; however, evaluation under b/2 requires a site visit to obtain information about each individual structure and, for the well pumps, requires the historic name of the pump. A search for the history of each specific well that was drilled before 1977 in the Oil Field would be conducted through the DOGGR "Pre-1977 Production and Injection Scanned Documents" website. This is the portal for the detailed drilling, drawing, and maintenance records for wells located in the Oil Field that were in production prior to 1977 and a system of tracking wells by their historic name or number (i.e., not by the assigned American Petroleum Institute [API] number). Because no site visit or other access to historic records was provided as a part of this analysis, a definitive determination cannot be made about the Project Site's eligibility under criterion b/2.

The City IOF does not appear to be eligible for listing in the NRHP and/or CRHR under c/3 for possessing the distinctive characteristics of equipment and structures considered significant in the history of oil exploration in the United States, California, or Culver City. An aerial survey of the City IOF did not reveal that the oil pumping equipment, machinery, and associated features of the Oil Field rise above being considered ordinary and ubiquitous elements of a producing oil field's infrastructure.

The City IOF has not yielded, nor does the City IOF appear to have the potential to yield, information important about prehistory or history of the exploration of crude oil in Culver City, Los Angeles County, or California. The City IOF does not appear eligible for listing in the NRHP or CRHR under criterion d/4.

The Cone Trust House is located within the boundary of the County IOF and is under the protection of the Baldwin Hills Community Standards District (CSD) (County of Los Angeles 2017). Section 22.44.142.E.8.a of the CSD requires that oil operations within the County IOF not result in impacts to the Cone Trust House. The CSD does not apply to the City IOF; however, the Drilling Regulations related to grading and geotechnical investigations would ensure that there would be no indirect impacts to the Cone Trust House due to nearby earthwork. The Drilling Regulations include various requirements for site development to address slope stability, including landslides. Drilling Regulations Section 10 requires that a grading permit be obtained from the City's Department of Public Works for all grading, except as defined in the Grading Guidelines as adopted by the Los Angeles County Department of Public Works. Grading design and grading plan preparation shall conform to the requirements of the Los Angeles County Grading Guidelines. Compliance with the Drilling Regulations would ensure that indirect impacts to the Cone Trust House from activities in the City IOF would be less than significant.

Based upon the Phase I-level investigation and aerial survey of the Oil Field, which included a review of archival material about the history of the built-environment resources located therein, it does not appear that the Project's Maximum Buildout Scenario would result in a significant adverse impact to any identified or eligible historical resources. However, this cannot be definitively determined until a site visit is conducted to evaluate the facilities. With preparation of the Cultural Resources Assessment required by Drilling Regulations Section 30.B, an on-site

inspection of the built-environment resources of the City IOF would be conducted. If unknown resources are found through this evaluation, the Drilling Regulations require preparation of a Treatment Plan to ensure that any new discoveries are adequately recorded, evaluated and, if found to be potentially significant, would be mitigated to levels less than significant to the satisfaction of the Community Development Director. Potential impacts to historic resources would be less than significant and no mitigation is required.

Threshold 4-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

The records search and literature review conducted at the SCCIC indicate that seven archaeological studies have been conducted near the Project Site. Of those, one included the entire Project Site. The records search further indicates that at least 15 archaeological sites have been recorded near, but not on, the Project Site. One of those—CA-LAN-2966, a prehistoric site—appears to be situated near the Project Site's northern site boundary. Its precise location and present condition is not known. Because the Project Site consists of privately owned property that is currently operated by a private company, an on-site survey was not conducted; therefore, the current condition and disposition of the recorded prehistoric site and the existence of additional sites on the Project Site is unknown.

According to the CA-LAN-2966 site record (Solis 2000), the prehistoric site was heavily disturbed at the time of its recordation in November of 2000. Approximately 15 additional sites are located nearby. Oilfield activities that have the potential to impact archaeological resources include any that would disturb relatively undisturbed, native sediments, such as well pad construction, new well drilling, and pipeline or oil tank construction excavations. Routine maintenance of existing wells is not anticipated to have the potential to impact archaeological resources.

Because there may be additional cultural resources sites on the Project Site—on the surface or buried—a pedestrian survey and monitoring during grading is recommended. There are mitigation measures in DOGGR's Draft Mitigation Policy Manual, prepared pursuant to the SB4 EIR, which is included in Appendix B-2 of this Draft EIR, that are applicable to the analysis of archaeological resources. The number and title of these DOGGR SB4 measures are listed below (DOC 2015b):

- SB4 CUL-1a: Require Information and Evaluate Cultural Resources
- SB4 CUL-1b: Complete Native American Coordination
- SB4 CUL-1c: Prepare and Implement Cultural Resources Management and Treatment Plan
- SB4 CUL-1e: Provide Cultural Resources Specialist with the Authority to Halt Earth Disturbing Activities
- SB4 CUL-1f: Conduct a Cultural Resources Worker Environmental Awareness Program
- SB4 CUL-1g: Monitoring Earth Disturbing Activities for Cultural Resources
- SB4 CUL-1f: Provide Native American Monitoring During Earth Disturbing Activities
- SB4 CUL-1j: Curate all Discovered Cultural Resources Associated with Earth Disturbing Activities

The intent of these DOGGR SB4 measures is already incorporated into requirements set forth in the Drilling Regulations of the Specific Plan, and no new or additional measures are required. Therefore, by following Drilling Regulations Section 30.B, which requires Archaeological Training

and a Cultural Resources Assessment for the Project (including a pedestrian survey of the Project Site), impacts to archaeological resources would be less than significant. If unknown archaeological resources are found, the Drilling Regulations require preparation of a Treatment Plan to ensure that any new discoveries are adequately recorded, evaluated and, if found to be potentially significant, mitigated to less than significant levels to the satisfaction of the Community Development Director. Potential impacts to archaeological resources would be less than significant and no mitigation is required.

Threshold 4-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

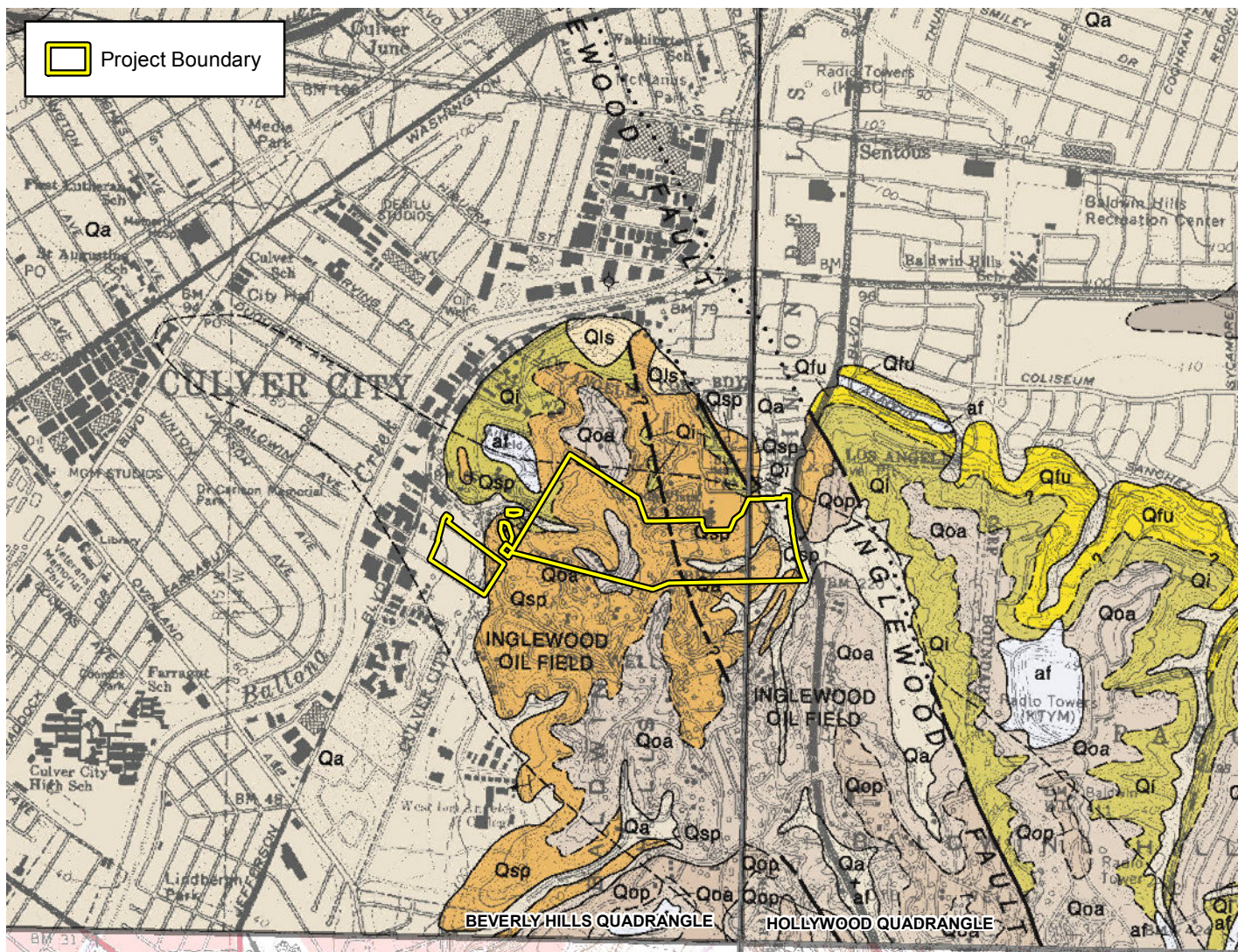
Because the Project Site consists of privately-owned property that is not publicly accessible, an on-site paleontological resource field survey was not conducted. As shown on Exhibit 4.4-1, Geology of Inglewood Oil Field, geological deposits within the Project Site consist of Quaternary San Pedro Sand (Qsp), Quaternary Inglewood Formation (Qi), Quaternary older alluvium (Qoa), and Quaternary alluvium (Qa)(Dibblee 1991a, 1991b). A paleontological resource records search was conducted by Dr. Samuel McLeod, Vertebrate Paleontology Section at the NHMLAC on August 23, 2012 (see Appendix D of this Draft EIR). The records search found the following:

There are no vertebrate fossil localities that lie directly within the Project Site boundaries, but there are vertebrate fossil localities nearby from sedimentary rocks similar to those that occur within the Project Site. Surficial deposits in the most elevated terrain of the Project Site consist of older Quaternary Alluvium. Localities have been recorded from somewhat similar older Quaternary Alluvium deposits just to the north from just west of La Brea Boulevard to west of La Cienega Boulevard. These localities include, among others, fossil human (*Homo sapiens*), recovered from a depth of 12–13 feet below the surface, fossil mastodon (*Mammut*) at unknown depth, fossil sabretooth cat (*Smilodon*) at unknown depth, fossil horse (*Equus*) at a depth of six feet below the surface, and additional fossil human (*Homo sapiens*) at a depth of 19–23 feet. Underlying the older Quaternary Alluvium in the Project Site, and exposed downslope on the hills, there are deposits of the marine early Pleistocene San Pedro Sand (also known as Culver Sand) and the Inglewood Formation. The closest vertebrate fossil locality in these deposits is situated directly east of the Project area on the edge of the Baldwin Hills between Hillcrest Drive and Marlon Avenue. Fossils of bonito shark (*Isurus*), speckled sanddab (*Citharichthys stigmaeus*) and longfin sanddab (*Citharichthys xanthostigma*) were recovered.

The records search determined that surface grading or shallow excavations in the older Quaternary alluvium exposed at elevation in the proposed Project Site need not be monitored; however, deeper excavations that extend into older deposits could uncover significant fossil vertebrate remains and should be monitored. Because some of the localities from similar sedimentary deposits have produced only very small fossils, McLeod (2012) recommends that sediment samples be collected to recover small vertebrate fossil if they exist. Any fossils recovered during monitoring should be deposited in an accredited scientific institution in perpetuity.

Based on the information from the NHMLAC records search, excavations in the San Pedro Sand and Older alluvium sediments are likely to encounter fossils considered to be significant paleontological resources. Therefore, it is recommended that any activities within the sensitive paleontological formations, including older surficial sediments (Qoa), in the San Pedro Sand (Qsp) or in the Inglewood Formation (Qi) be monitored by a qualified Paleontologist. There are mitigation measures in DOGGR's Draft Mitigation Policy Manual, prepared pursuant to the SB4 EIR, which is included in Appendix B-2 of this Draft EIR, that are applicable to the analysis of paleontological resources. The number and title of these DOGGR SB4 measures are listed below (DOC 2015b):

 Project Boundary



LEGEND

- Qa**
- SURFICIAL SEDIMENTS**
Unconsolidated detrital sediments; generally undisturbed
Qa Alluvium: clay, sand and gravel; includes gravel and sand of minor stream channels
- Qoa**
- OLDER SURFICIAL SEDIMENTS**
Unconsolidated to weakly consolidated; dissected and eroded where elevated;
late Pleistocene age
Qoa Older alluvium, gray to light brown pebble-gravel, sand, silt and clay of detritus derived from Santa Monica Mountains; similar to Qoa, but slightly consolidated; in Baldwin Hills designated as Baldwin Hills sandy gravel (Weber et al., 1982), where it is much dissected and eroded
- UNCONFORMITY**
in mountain areas
- Qsp Ql**
- SHALLOW MARINE SEDIMENTS**
Shallow marine clastic sediments exposed in Baldwin Hills; weakly consolidated, eroded;
Pleistocene age
Qsp San Pedro Sand (of Wright 1987; Weber et al. 1982): light gray to light brown sand, fine to coarse grained, pebbly; locally contains shell fragments
Ql Inglewood Formation (of Wright 1987; Weber et al. 1982): light gray, friable; fine grained sandstone and interbedded soft gray siltstone

Holocene
QUATERNARY
CENOZOIC
Pleistocene

No Geologic Data Shown

Source: Dibblee Foundation 7.5 minute Geologic Map
Hollywood and South Burbank (2010)
Beverly Hills and South Van Nuys (2010)
USGS 7.5 Minute Quadrangle
Inglewood
Venice
Township: 02S
Range: 14W
Sections: 7 & 8

Geology of Inglewood Oil Field

Inglewood Oil Field Specific Plan Project



Exhibit 4.4-1



- SB4 PALEO-1a: Require Information and Evaluate Paleontological Resources
- SB4 PALEO-1b: Develop Paleontological Resource Mitigation Plan
- SB4 PALEO-1c: Retain Qualified Paleontological Resources Staff
- SB4 PALEO 1e: Monitor Earth Disturbing Activities for Paleontological Resources
- SB4 PALEO 1f: Project Qualified Paleontological Resources Monitor with Authority to Halt Earth Disturbing Activities
- SB4 PALEO-1g: Prepare Paleontological Resources Report for the Monitoring of Earth Disturbing Activities
- SB4 PALEO 1h: Curate all Discovered Paleontological Resources Associated with Earth Disturbing Activities

The intent of these DOGGR SB4 measures is already incorporated into requirements set forth in the Drilling Regulations of the Specific Plan, and no new or additional measures are required. Therefore, by following Drilling Regulations Section 30.B, which requires a qualified Paleontologist, approved by the Community Development Director, to monitor all rough grading and other significant ground-disturbing activities in paleontologically sensitive sediments, and to prepare a report in the event that fossil resources are encountered and deposited in an accredited scientific institution, impacts would be less than significant. The sensitive sediments that have been identified in the Inglewood Oil Field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. The Drilling Regulations would ensure that potential impacts to paleontological resources would be less than significant and no mitigation is required.

Threshold 4-4: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

The Native American Heritage Commission (NAHC) was contacted on October 6, and 12, 2015, and was requested to review its Sacred Lands Inventory for any sacred sites that might be associated with the Project Site. The NAHC was also requested to provide the appropriate Native American contacts with respect to AB 52 and SB 18. A response was received on October 20, 2015. On October 28, 2015, the City of Culver City (City) sent consultation letters by certified mail to the NAHC-listed tribes consistent with the requirements of these regulations.

No response to the City's outreach was received. As such, the City has concluded that there is no substantial evidence that there are any significant tribal resources in the City IOF, and impacts would be less than significant. As discussed under Threshold 4-1, the City IOF does not appear eligible for listing in the NRHP and/or the CRHR. No mitigation is required.

4.4.8 CUMULATIVE IMPACTS

Potential impacts related to archaeological and paleontological resources would be less than significant through the implementation of the Drilling Regulations. Direct impacts to on-site cultural resources are site-specific. The proposed Project's Maximum Buildout Scenario, in conjunction with the effects of past projects, other current projects, and probable future projects may result in an increase in the local population that could lead to accelerated degradation of previously unknown archaeological resource sites and paleontological resources. However, each development proposal received by the City undergoes all legally required environmental review and would be subject to the same resource protection requirements. Cultural resources site surveys that are conducted prior to development would allow the early identification of on-site cultural resources and the preservation of significant resources. Compliance with Section 15064.5 of the State CEQA Guidelines to determine if there are important cultural resources on individual development sites would prevent cumulative impacts on cultural resources. If there is a potential for significant impacts on cultural or paleontological resources, an investigation would be required to determine the nature and extent of the resources and to identify appropriate mitigation measures, including existing requirements such as those outlined in the Drilling Regulations. As such, cumulative impacts to archaeological and paleontological resources would be less than significant. No mitigation is required.

4.4.9 MITIGATION MEASURES

Direct and cumulative impacts to cultural and tribal resources would be less than significant and no mitigation is required.

4.4.10 LEVEL OF SIGNIFICANCE

All potential impacts to cultural resources would be less than significant. Table 4.4-1 below summarizes the significance finding of each threshold addressed in this section before and after mitigation, where applicable.

**TABLE 4.4-1
SIGNIFICANCE SUMMARY**

Threshold	Project Level of Significance	Mitigation Measure(s)	Level of Significance after Mitigation
4-1 Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	Less than Significant	N/A	Less than Significant
4-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	Less than Significant	N/A	Less than Significant
4-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less than Significant	N/A	Less than Significant
4-4 Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> a) 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 b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 	Less than Significant	N/A	Less than Significant
N/A: not applicable			

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