<table>
<thead>
<tr>
<th>Report No.</th>
<th>Other IDs</th>
<th>Year</th>
<th>Author(s)</th>
<th>Title</th>
<th>Affiliation</th>
<th>Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA-00340</td>
<td></td>
<td>1987</td>
<td>Robinson, R. W.</td>
<td>Field check and examination of property located near the intersection of Sepulveda Blvd. and the San Diego freeway</td>
<td>Summa Corporation</td>
<td>19-000213, 19-000216</td>
</tr>
<tr>
<td>LA-00389</td>
<td></td>
<td>1988</td>
<td>Bissell, Ronald M.</td>
<td>Cultural Resources Reconnaissance of Five Areas in the Frank G. Bonelli Regional County Park Los Angeles County, California</td>
<td>RMW Paleo Associates, Inc.</td>
<td></td>
</tr>
<tr>
<td>LA-00729</td>
<td></td>
<td>1947</td>
<td>Peck, Stuart L.</td>
<td>Mar Vista Site (193)</td>
<td></td>
<td>19-000193</td>
</tr>
<tr>
<td>LA-01821</td>
<td></td>
<td>1989</td>
<td>Foster, John M.</td>
<td>Cultural Resource Investigation of Tentative Subdivision Map No. 47426 Los Angeles, California</td>
<td>Greenwood and Associates</td>
<td></td>
</tr>
<tr>
<td>Report No.</td>
<td>Year</td>
<td>Author(s)</td>
<td>Title</td>
<td>Affiliation</td>
<td>Resources</td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td>------</td>
<td>-----------</td>
<td>-------</td>
<td>-------------</td>
<td>-----------</td>
<td></td>
</tr>
<tr>
<td>LA-02990</td>
<td>1994</td>
<td>Grenda, Donn R., Jeffrey A. Homburg, and Jeffrey H. Altschul</td>
<td>The Cantilena Site (CA-LAN-60): Data Recovery at a Middle Period, Creek-edge Site in the Ballona Wetlands, Los Angeles County, California</td>
<td>Statistical Research, Inc.</td>
<td>19-000060</td>
<td></td>
</tr>
<tr>
<td>Report No.</td>
<td>Other IDs</td>
<td>Year</td>
<td>Author(s)</td>
<td>Title</td>
<td>Affiliation</td>
<td>Resources</td>
</tr>
<tr>
<td>------------</td>
<td>-----------</td>
<td>------</td>
<td>----------------------</td>
<td>----------------------------------------------------------------------</td>
<td>--------------------------------------</td>
<td>-----------</td>
</tr>
</tbody>
</table>

Additional IDs:
19-000001, 19-000002, 19-000003,
19-000004, 19-000005, 19-000007,
19-000009, 19-000010, 19-000011,
19-000012, 19-000013, 19-000015,
19-000016, 19-000017, 19-000018,
19-000019, 19-000023, 19-000024,
19-000027, 19-000026, 19-000029,
19-000030, 19-000031, 19-000033,
19-000037, 19-000038, 19-000039,
19-000040, 19-000044, 19-000045,
19-000046, 19-000047, 19-000048,
19-000049, 19-000050, 19-000051,
19-000052, 19-000053, 19-000054,
19-000055, 19-000056, 19-000057,
19-000058, 19-000059, 19-000060,
19-000061, 19-000062, 19-000063,
19-000064, 19-000065, 19-000066,
19-000067, 19-000068, 19-000069,
19-000070, 19-000071, 19-000072,
19-000073, 19-000074, 19-000078,
19-000080, 19-000088, 19-000090,
19-000091, 19-000092, 19-000094,
19-000096, 19-000097, 19-000098,
19-000099, 19-00100, 19-00101,
19-00102, 19-00103, 19-00104,
19-00105, 19-00106, 19-00107,
19-00108, 19-00109, 19-00110,
19-00112, 19-00113, 19-00114,
19-00115, 19-00116, 19-00117,
19-00118, 19-00119, 19-00120,
19-00121, 19-00122, 19-00123,
19-00124, 19-00125, 19-00126,
19-00127, 19-00131, 19-00133,
19-00134, 19-00135, 19-00136,
19-00137, 19-00138, 19-00139,
19-00140, 19-00141, 19-00142,
19-00143, 19-00144, 19-00145,
19-00146, 19-00147, 19-00148,
19-00149, 19-00150, 19-00151,
19-00152, 19-00153, 19-00154,
19-00155, 19-00156, 19-00159,
19-00161, 19-00162, 19-00170,
19-00171, 19-00172, 19-00174,
19-00175, 19-00178, 19-00179,
19-00180, 19-00181, 19-00182,
19-00183, 19-00184, 19-00185,
<table>
<thead>
<tr>
<th>Report No.</th>
<th>Year</th>
<th>Author(s)</th>
<th>Title</th>
<th>Affiliation</th>
<th>Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report No.</td>
<td>Other IDs</td>
<td>Year</td>
<td>Author(s)</td>
<td>Title</td>
<td>Affiliation</td>
</tr>
<tr>
<td>-----------</td>
<td>-----------</td>
<td>------</td>
<td>-----------</td>
<td>-------</td>
<td>-------------</td>
</tr>
<tr>
<td>LA-04891</td>
<td></td>
<td>2000</td>
<td>Sylvia, Barbara</td>
<td>A Proposed High Occupancy Vehicle Lane Between I-105 and Sr-90 on I-405 in the City of Los Angeles, Los Angeles County California</td>
<td>Caltrans District 7</td>
</tr>
<tr>
<td>LA-04908</td>
<td></td>
<td>1999</td>
<td>Kane, Diane</td>
<td>Historic Property Survey Report</td>
<td>Caltrans District 7</td>
</tr>
<tr>
<td>Report No.</td>
<td>Other IDs</td>
<td>Year</td>
<td>Author(s)</td>
<td>Title</td>
<td>Affiliation</td>
</tr>
<tr>
<td>-----------</td>
<td>-----------</td>
<td>------</td>
<td>-----------</td>
<td>-------</td>
<td>-------------</td>
</tr>
<tr>
<td>LA-10489</td>
<td></td>
<td>2000</td>
<td>Kane, Diane</td>
<td>Historic Property Survey Report for Route 405 HOV Lane Between I-105 and SR-90 in Los Angeles County, California</td>
<td>Caltrans</td>
</tr>
<tr>
<td>LA-10782</td>
<td></td>
<td>2010</td>
<td>Chasteen, Carrie</td>
<td>Cultural Resources Assessment - Arcadia County Park, 405 S. Santa Anita Avenue, Arcadia, Los Angeles County, California</td>
<td>PARSONS</td>
</tr>
<tr>
<td>LA-10879</td>
<td></td>
<td>2007</td>
<td>Unknown</td>
<td>Building 1 at Playa Vista Hughes Aircraft Administration Building, Los Angeles, California, Historical Assessment and Treatment Recommendations</td>
<td>Architectural Resources Group</td>
</tr>
<tr>
<td>LA-11482</td>
<td></td>
<td></td>
<td>Racer, F.H.</td>
<td>Camp Sites in Harbor District</td>
<td></td>
</tr>
<tr>
<td>LA-12458</td>
<td></td>
<td>2013</td>
<td>Castanon, David</td>
<td>Renovation plans for Building #1 at the Hercules Campus</td>
<td>Los Angeles District Corps of Engineers</td>
</tr>
</tbody>
</table>
March 25, 2017

Pat Maxon
Director of Cultural Resources
Psomas
3 Hutton Centre Drive, Suite 200
Santa Ana, CA  92707

Re: Identify Built Environment Resources for the City of Culver’s Inglewood Oil Field Specific Plan Project

Dear Mr. Maxon;

Daly & Associates has completed a Phase 1-level investigation of the built-environment resources located within the area associated with City of Culver’s Inglewood Oil Field Specific Plan (Specific Plan) Area-of-Potential-Effect (APE). (See Figure 1)

The City of Culver City (City) is in the process of preparing the Specific Plan, pursuant to a resolution adopted by the City in June 2014, to provide zoning regulations regarding current and future oil production operations on the approximate 80-acre portion of the Inglewood Oil Field (Old Field) within the City’s jurisdiction (Project Site). The City’s jurisdiction comprises the northernmost portion of the roughly 1,000-acre Oil Field, which includes three small, discrete land areas that are also part of the active Oil Field boundary.

Drilling began in the Oil Field in the 1920s, and it was considered part of the larger Long Beach Oil Fields (California’s Department of Conservation Division of Gas, Oil, and Geothermal Resources [DOGGR] District 1: Cypress). In the late 1990s and early 2000s, Plains Exploration and Production Company (PXP) obtained drilling rights for the Oil Field. As of January 2017, SPRSentinel Peak Resources (SPR) is the current Oil Field Operator of the site (which includes the City’s portion), and would be subject to the Specific Plan upon its adoption.

The Specific Plan would update and supersede the most recent comprehensive amendments to the City’s existing oil drilling regulations, which were adopted in 2003. The Specific Plan regulations are intended to reflect the considerable changes in oil production-related technology, legislation, and public opinion in the last decade, while establishing standards to safeguard the surrounding community and environment based on site-specific conditions. Based on initial review of the available documents, the Specific Plan defines a 400-foot-wide No Drilling Buffer and specify a maximum of 30 wells to be drilled or re-drilled through the year 2028.
The Project Site is located within the City of Culver City, in western Los Angeles County. The majority of the Oil Field is within the unincorporated area of Los Angeles County known as Baldwin Hills. The Project Site is generally bound by La Cienega Boulevard to the east, the City of Culver City/Los Angeles County border to the south, Culver City Park and College Boulevard to the west, and the Baldwin Hills Scenic Overlook Park and Blair Hills residential area of Culver City to the north.

In October 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD) establishing regulations for oil and gas production activities in the unincorporated County portion of the Oil Field. A CSD is a supplemental district used by the County to address special issues that are unique to certain geographical areas within the unincorporated area of the County. The regulations set forth in the CSD and in the settlement agreement are only applicable to the portion of the Oil Field within the unincorporated County of Los Angeles, and do not apply to the Project Site. The Cone Trust house is located within the boundary of the CSD and is under the protection of Los Angeles County Code, Title 22: Baldwin Hills Community Standards District; Community Standards Ordinance No. 22.44.142 (E) (8) (a).

The existing oil wells, and associated features and objects, within the Project Site appear to have reached sufficient age to be evaluated for significance as potential historical resources under Section 15064.5 of the California Environmental Quality Act (CEQA).

Pamela Daly, M.S.H.P., Principal Architectural Historian of Daly & Associates, performed a study to identify any potential historical resources within the APE that may be impacted by implementation of the proposed project, and to facilitate initial environmental compliance of the project under the provisions of CEQA. The Phase 1-level investigation consisted of an aerial survey of the project area, and research into the history of the Oil Field.

The purpose of this Phase 1-level study was to ascertain if there is the potential for any of the built-environment resources in the APE to be considered historic resources, and if those resources would suffer substantial adverse changes as a result of future activities in the Oil Field.

**Description of the built-environment resource**

The Project Site is an operating oil and gas production field. Existing land use on the Project Site includes activities and facilities associated with the larger operation of the Oil Field by SPR. These activities and facilities include petroleum extraction and storage, as well as transmission pipelines. Existing facilities are dispersed throughout the site with intermittent areas of natural vegetation. A tank farm, several types of wells (active, idle, production, injection), and pipelines to transport the produced oil and gas are located throughout the Project Site. (Figure 2)
According to DOGGR 2015 data records, there are 36 active wells (26 production and 10 injection), 5 wells that are idle, and 28 plugged or abandoned wells within the Project Site (BonTerra Psomas, “Initial Study: Inglewood Oil Field Specific Plan Project”, October 2015: 7).

While there are locked gates where access to the Oil Field could be obtained (one is near Culver City Park), the main access to the site is located on Fairfax Avenue, south of Stocker Street. The Fairfax/Stocker entrance provides on-site access to the bulk of the Oil Field areas through internal roadways and bridges over La Cienega Boulevard.

**Methodology**

The research involved with this investigation included a review of the information available about the historic development of the area. Due to the wishes of the oil field operator, an on-site pedestrian survey of the Project Site was not possible. Instead, an aerial assessment of the built-environment resources located within the Project Site was made through use of Google Earth to evaluate visible aspects of the existing oil field equipment and structures for historical significance and integrity. (Google Earth accessed October 2015.)

The Directory of Historic Property Data for Los Angeles County maintained by the California Office of Historic Preservation (OHP) was reviewed to ascertain if the Project Site portion of the Oil Field had been previously evaluated for historical significance. The Culver City portion of the Oil Field does not appear to have been evaluated for listing in the National Register of Historic
Places, the California Register of Historical Resources (California Register), or designated as a “Cultural Resource” in Culver City.

**Regulatory Framework**

1. **National Historic Preservation Act**

To be eligible for listing in the National Register, the quality of significance in American history, architecture, archaeology, engineering, or culture must be in a district, site, building, structure, or object that possesses integrity of location, design, setting, materials, workmanship, feeling and association, and:

   A: is associated with events that have made a significant contribution to the broad patterns of our history; or

   B: is associated with the lives of persons significant in our past; or

   C: embodies the distinctive characteristics of a type, period, or method of construction or that represents 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: yields, or may be likely to yield, information important to prehistory or history.

A property eligible for listing in the National Register must meet one or more of the four criteria (A-D) defined above. In addition, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for National Register listing. In addition to meeting the criteria of significance, a property must have integrity. Integrity is the ability of a property to convey its significance to the public.

2. **California Register of Historical Resources**

CEQA defines a substantial adverse change as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historic resource is materially 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 inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.*
To be eligible for listing in the California Register, a historic resource must be significant at the local, state, or national level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. (California Code of Regulations, California Register of Historical Resources [Title 14, Chapter11.5], Section 4852[c])

3. Culver City

Under Title 15, Land Usage of the Culver City Municipal Code, Culver City has created Chapter 15.05 Historic Preservation Program to “to protect the City's unique historical, architectural and cultural heritage as reflected in the City's architectural history and patterns of cultural development. It is also intended to encourage and facilitate public knowledge, understanding and appreciation of the City's historic past and unique cultural resources.” (Culver City Municipal Code: Title 15; Chapter 15.05, Section 15.05.005 Purpose. Accessed October 25, 2015) Excerpts from the Municipal Code and General Plan that are relevant to the current project are noted below.

§15.05.020 Cultural Resource 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:

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.

HISTORIC DISTRICT. A designated area consisting of one (1) or more contiguous parcels improved with structures at which events occurred that made a significant contribution to the City, State or national history or culture, or an area that contains structures that are collectively significant examples of period, style, or method of construction that provide distinguishing characteristics of the architectural type or period represented. An historic district may be either a landmark district or a significant district.

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?

Potential for Identification of Historic Resources

Historic Context

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 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. “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 and elsewhere. Other uses soon increased the overall demand.” (Pees, Samuel T. “Oil History” Accessed October 25, 2015: http://www.petroleumhistory.org/OilHistory/pages/Central%20Power/centralpower.html
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 4 million barrels of oil (DOGGR). “Oil and Gas Production History in California”. Accessed: October 30, 2015. ftp://ftp.consrv.ca.gov/pub/oil/history/History_of_Calif.pdf

The 1920s were a remarkable period of time for the oil industry in Los Angeles. California was then producing 77 million barrels of oil per year, and several large oil and gas fields were discovered in Study Region 1 during this time including: Huntington Beach; Santa Fe Springs; Dominguez; and Signal Hill. The Standard Oil Company discovered the Huntington Oil and Gas Field in 1920 and by 1921 it had 59 wells and was producing 16,500 barrels of oil a day. The Signal Hill and Santa Fe Springs fields were both discovered in 1921. Under the operation of the Shell Oil Company, the Signal Hill Oil and Gas Field became one of the most productive oil fields in the world, beginning with the Alamitos #1 well, which was a “gusher” that rose 114 feet into the air. (DOGGR)

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 of in 1932 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 which 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. (DOGGR)

Results of Survey

Our investigation of the Project Site was based upon an aerial inspection of the built environment resources located within the boundary by the use of Google Earth aerial views; a search through selected DOGGR records of wells located within the Oil Field; and a review of available information regarding the equipment and structures commonly found in a producing oil field. This information was combined with Ms. Daly’s experience in evaluating buildings and structures within producing oil fields in Orange County, Los Angeles County, and Kern County.

Producing oil fields tend to have the same assortment of structures and features located within their areas of operation used to extract, pump, and distribute crude oil, as well as having buildings and structures to provide on-site support space such as a field office, maintenance shed, storage sheds for motor equipment and surplus pipes, concrete pads, fencing, outdoor light fixtures, and holding tanks/tank farms. Our aerial survey of the Oil Field did not reveal any structures that appeared to date from before the 1960s, when most pump jacks became
powered by small electric motors, and those structures or features not commonly found within producing oil fields in California.

To search for the history of a specific well that was drilled before 1977 in the Oil Field, one must go to the DOGGR “Pre-1977 Production and Injection Scanned Documents” website (http://www.conservation.ca.gov/dog/Pages/Pre1977ProductionandInjectionScannedDocuments.aspx). This is the portal for the detailed drilling, draw, 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 assigned American Petroleum Institute (API) number was put into place. Historically, the Oil Field is located within District 1: Cypress (Long Beach) in California. The DOGGR records have nineteen tapes (Tapes 173 to 192) of thousands of scanned documents regarding wells within the Oil Field. To find a specific well, one must search by the topographic map coordinates of Township/Range/and Section number of where an individual well is located, and the historic name or number (not the API number) that has been assigned to that well. During a pedestrian-level search of the property, the specific name given to that well is recorded and further research performed by going through the historic records for that well in the DOGGR records. For instance, during a recent project in an old field in La Habra, the Hornby #2, and the Fullerton #2 and #6 wells were surveyed and documented. The names given to a well are usually associated with sinking of wells by the first producers on the field, and those can date back to the 1920s in the Oil Field.

The Oil Field does not appear eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) under criterion A/1. The Oil Field 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 twentieth-century, it did not play a pivotal role in the City’s history, unlike the movie and film industry, and Hughes Aircraft Company. Our research did not reveal that the Oil Field was considered any more important than other of Los Angeles County’s oil fields, or that the Oil Field represented any technologic advancement or engineering knowledge in the pumping process of crude oil. The built environment resources specifically located within the Oil Field 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.

The Oil Field does not appear to be eligible for listing in the NRHP or CRHR under criterion B/2, as having been directly associated with the lives of persons significant in the history of crude oil in Los Angeles County or California. Before initiating Project activities, it is recommended that the specific well or wells that will be impacted by the Project be researched with the use of the DOGGR archives. The specific name of the well should be determined by a site visit, and the history of the well reviewed to ascertain if the well had a direct relationship with any person important to the history of oil exploration in Los Angeles County, such as Edward Doheny or Emma McCutcheon Summers.
Our aerial survey of the Oil Field 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. A pedestrian-level survey of the Oil Field would be necessary to determine if the built-environment resources could be eligible for listing in the NRHP or CRHR under criterion 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.

The Oil Field has not yielded, nor does the Oil Field 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 Oil Field does not appear eligible for listing in the NRHP or CRHR under criterion D/4.

We have also reviewed the Oil Field against the City’s criteria required for the designation of Cultural Resources. To be considered for designation, the resource must be over 50 years old and have a special importance to the City. An on-site inspection of the built-environment resources of the Oil Field, and investigation into the history of the specific wells to be affected by Project activities, would be required to assess if the resource possesses architectural or historical significance to the City.

**Conclusion**

Based upon the Phase 1-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 proposed project would result in a significant adverse impact to any identified or eligible historical resources, but this would need to be validated by a pedestrian-level survey of the Oil Field before initiation of Project activities.

We hope the information within this letter will prove to be helpful as you continue through the environmental review and entitlement processes. Please do not hesitate to contact us if you have any questions.

Sincerely,

Pamela Daly, M.S.H.P.
Principal/Architectural Historian
17 June 2015

BonTerra Psomas
3 Hutton Centre Drive, Suite 200
Santa Ana, CA 92707

Attn: David M. Smith, Senior Archaeologist

re: Paleontological Resources for the proposed Bankfield Sewage Pump Station Project, in Culver City, Los Angeles County, project area

Dear David:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Bankfield Sewage Pump Station Project, in Culver City, Los Angeles County, project area as outlined on the portion of the Venice USGS topographic quadrangle map that you sent to me via e-mail on 29 May 2015. We do not have any vertebrate fossil localities that lie within the proposed project site boundaries, but we do have localities nearby from similar deposits as occur subsurface in the proposed project area.

The entire proposed project area contains surface deposits of younger Quaternary Alluvium, derived as alluvial fan deposits from the Baldwin Hills immediately to the east or as fluvial deposits from Centinela Creek drainage immediately to the west. These deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers. At relatively shallow depth in this area, however, there are older Quaternary sediments that do contain significant fossil vertebrate materials. Our closest fossil vertebrate localities in similar sediments are around Ballona Creek to the north-northeast where we have locality LACM 4232, near the intersection of La Cienega Boulevard with Rodeo Road, where remains of fossil human, Homo sapiens, were recovered from a depth of 12-13 feet below the surface, locality LACM 3368, further north near the intersection of Jefferson Boulevard and Sentous Avenue, that contained a specimen of fossil horse, Equus, at unknown depth, and locality LACM 4250, further north just
south of Washington Boulevard and west of La Cienega Boulevard, where remains of fossil mammoth, *Mammuthus*, were collected at unknown depth. We have a number of additional fossil vertebrate localities east of these sites, along the Southern Pacific Railway and Rodeo Road between Crenshaw Boulevard and Ballona Creek, that were collected in the 1920's during excavations for the Outfall Sewer in the area. Although shallow, most of these localities did not record the depth at which specimens were recovered. These localities include LACM 1159 that contained fossil human, *Homo sapiens*, at a depth of 19-23 feet, LACM 3366 with fossil camel, *Camelops*, at unknown depth, LACM 3367 with fossil mastodon, *Mammut*, at unknown depth, LACM 3369 with fossil horse, *Equus*, at a depth of only six feet below the surface, and LACM 3370 with fossil sabretooth cat, *Smilodon*, at unknown depth.

Surface grading or very shallow excavations in the proposed project area probably will not uncover significant fossil vertebrate remains. Deeper excavations, however, may well encounter significant vertebrate fossils, possibly even including human remains, as somewhat nearby localities have produced vertebrate fossils at depths as shallow as six feet. Any substantial excavations in the proposed project area, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice
October 20, 2015

Patrick Maxon
Bon Terra Psomas
3 Hutton Centre Drive, Suite 200
Culver City, CA

Sent by Email: megan.larum@psomas.com
Number of Pages: 3

RE: General Plan / Specific Plan Amendment: Inglewood Oil Field Specific Plan, Los Angeles County

Dear Mr. Maxon:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced project. Government Code §65352.3 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to tribal cultural resources in creating or amending general plans, including specific plans. As of July 1, 2015, Public Resources Code Sections 21080.1, 21080.3.1 and 21080.3.2 require public agencies to consult with California Native American tribes identified by the NAHC for the purpose mitigating impacts to tribal cultural resources under the California Environmental Quality Act (CEQA). In accordance with Public Resources Code Section 21080.1(d):

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
   - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
   - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
   - If the probability is low, moderate, or high that cultural resources are located in the APE.
   - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:
   - Any report that may contain site forms, site significance, and suggested mitigation measurers.
     
     All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.
   
   3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. **A SFL search was completed with negative results.**

   4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

   5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: nw_nahc@pacbell.net.

Sincerely,

[Signature]

Rob Wood
Associate Governmental Program Analyst
Native American Heritage Commission
Tribal Consultation List
Los Angeles County
October 20, 2015

Soboba Band of Mission Indians
Rosemary Morillo, Chairperson; Attn: Carrie Garcia
P.O. Box 487
San Jacinto, CA 92581
ca Carrie@soboba-nsn.gov
(951) 654-2765

Gabrieleno /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908
Los Angeles, CA 90086
(909) 262-9351

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA 91778
GTTribalcouncil@aol.com
(626) 483-3564 Cell

Gabrieleno Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtongva@verizon.net
(562) 761-6417 Voice/Fax

Gabrieleno-Tongva Tribe
Linda Candelaria, Co-Chairperson
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067
(626) 676-1184 Cell

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723
gabrielenoins@gmail.com
(626) 926-4131

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 applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65362.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed Inglewood Oil Field Specific Plan, Los Angeles County.
October 7, 2015

Joseph Ontiveros  
Cultural Resources Director  
Soboba Band of Luiseno Indians  
P.O. Box 487  
San Jacinto, CA 92581

Subject: City of Culver City Inglewood Oil Field Specific Plan Project

Dear Joseph Ontiveros:

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation for projects prior to the release of a negative declaration, mitigated negative declaration or environmental impact report on or after July 1, 2015. A letter was received from your Tribe on July 27, 2015 requesting formal notification of proposed projects within the geographic area that is traditionally and culturally affiliated with the Soboba Band of Luiseno Indians. As such, we are providing you with information regarding the City’s Inglewood Oil Field Specific Plan Project (the “Project”) and an opportunity to consult with the City regarding the Project’s potential impacts to Tribal cultural resources.

The Project location is within the boundaries of the existing Inglewood Oil Field within the City of Culver City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries.

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City of Culver City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a more detailed Project description.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.
Your participation in this local planning process is important. If you have any additional knowledge of Native American Sacred Lands or other cultural resources on or near the Project site, or would like to consult on the Project under the protocols of AB 52, please respond to Sherry Jordan, Project Manager, within 30 days of receipt of this letter with a subject line referencing the "Inglewood Oil Field Specific Plan Project". You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated above. You may also contact me by phone at (310) 253-5746.

Sincerely,

CITYOF CULVER CITY

Sherry Jordan
Project Manager
October 28, 2015

Gabrieleno Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
PO Box 393
Covina, CA 91723

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Mr. Salas,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notice of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s
Inglewood Oil Field Specific Plan

Page 2

General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, in accordance with the deadlines set forth above, to Sherry Jordan, Project Manager, with a subject line referencing the “Inglewood Oil Field Specific Plan Project”. You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City
Attention: Sherry Jordan, City Attorney Office
9770 Culver Boulevard
Culver City, California 90232
sherry.jordan@culvercity.org
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,
Project Manager

Enclosed: 1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project
2. Initial Study, Inglewood Oil Field Specific Plan Project
October 28, 2015

Gabrieleno/Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
PO Box 490
Bellflower, CA 90707

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Mr. Dorame,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, in accordance with the deadlines set forth above, to Sherry Jordan, Project Manager, with a subject line referencing the "Inglewood Oil Field Specific Plan Project". You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City
Attention: Sherry Jordan, City Attorney Office
9770 Culver Boulevard
Culver City, California 90232
sherry.jordan@culvercity.org
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,
Project Manager

Enclosed: 1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project
2. Initial Study, Inglewood Oil Field Specific Plan Project
October 28, 2015

Gabrieleno/Tongva Nation
Sam Dunlap, Cultural Resources Director
PO Box 86908
Los Angeles, CA 90086

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Mr. Dunlap,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality ACT (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes **30 days** after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, in accordance with the deadlines set forth above, to Sherry Jordan, Project Manager, with a subject line referencing the "Inglewood Oil Field Specific Plan Project". You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City  
Attention: Sherry Jordan, City Attorney Office  
9770 Culver Boulevard  
Culver City, California 90232  
sherry.jordan@culvercity.org  
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,  
Project Manager

Enclosed: 1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project  
2. Initial Study, Inglewood Oil Field Specific Plan Project
October 28, 2015

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Mr. Morales,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Comission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s...
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided **90 days** from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, in accordance with the deadlines set forth above, to Sherry Jordan, Project Manager, with a subject line referencing the “Inglewood Oil Field Specific Plan Project”. You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City  
Attention: Sherry Jordan, City Attorney Office  
9770 Culver Boulevard  
Culver City, California 90232  
sherry.jordan@culvercity.org  
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,  
Project Manager

Enclosed:  
1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project  
2. Initial Study, Inglewood Oil Field Specific Plan Project
September 28, 2015

Gabrieleno-Tongva Tribe
Linda Candelaria, Co-Chairperson
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Ms. Candelaria,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s...
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided **90 days** from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, **in accordance with the deadlines set forth above**, to Sherry Jordan, Project Manager, with a subject line referencing the “Inglewood Oil Field Specific Plan Project”. You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City  
Attention: Sherry Jordan, City Attorney Office  
9770 Culver Boulevard  
Culver City, California 90232  
sherry.jordan@culvercity.org  
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,  
Project Manager

Enclosed:  
1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project  
2. Initial Study, Inglewood Oil Field Specific Plan Project
October 28, 2015

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Director
PO Box 487
San Jacinto, CA 92581

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Mr. Ontiveros,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s...
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, in accordance with the deadlines set forth above, to Sherry Jordan, Project Manager, with a subject line referencing the "Inglewood Oil Field Specific Plan Project". You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City  
Attention: Sherry Jordan, City Attorney Office  
9770 Culver Boulevard  
Culver City, California 90232  
sherry.jordan@culvercity.org  
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,  
Project Manager

Enclosed: 1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Inglewood Oil Field Specific Plan Project  
2. Initial Study, Inglewood Oil Field Specific Plan Project
October 28, 2015

Soboba Band of Mission Indians
Attn: Carrie Garcia
PO Box 487
San Jacinto, CA 92581

Senate Bill (SB) 18 Consultation (Government Code §65352.3) and Assembly Bill (AB) 52 (Public Resources Code §21080.3.1): Inglewood Oil Field Specific Plan Project, Culver City, Los Angeles County, California

Dear Ms. Garcia,

The City of Culver City is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the Inglewood Oil Field Specific Plan. As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of Culver City (City).

The proposed Project is defined as the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City. Please refer to the accompanying Notice of Preparation and Initial Study Checklist for a map indicating the Project boundaries and for a more detailed Project Description.

AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation in writing prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report on or after July 1, 2015. AB 52 places the burden of initiating consultation on the Tribes, but the provisions of the statute do not require the Native American Heritage Commission (NAHC) to provide lead agency information to Tribes until July 1, 2016 and CEQA revisions are not required to be adopted until that date. Therefore, in order to bridge this one year delay, the City is notifying you of this Project. AB 52 allows Tribes 30 days after receiving notification to request consultation.

SB 18 only applies to the amendment of a general plan and is, therefore, not applicable to the Project (as the Project concerns a specific plan that does not amend the City’s
General Plan). However, as a courtesy, the City is following the tribal consultation guidelines (Government Code Section 65352.3). Under the guidelines, tribes identified by the NAHC are provided **90 days** from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of Culver City, pursuant to SB 18.

An archaeological/historic records search will be conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to evaluate the existing conditions of the Project site and the surrounding area. A survey of the Project site to identify any exposed cultural resources is not planned at this time.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources on or near the Project site, and wish to consult with the City regarding these resources or mitigation measures to reduce impacts of the Project, please respond in writing, **in accordance with the deadlines set forth above**, to Sherry Jordan, Project Manager, with a subject line referencing the "Inglewood Oil Field Specific Plan Project". You may respond via email at sherry.jordan@culvercity.org, or by fax or mail at the fax number or mailing address indicated below. You may also contact me by phone at (310) 253-5746.

City of Culver City
Attention: Sherry Jordan, City Attorney Office
9770 Culver Boulevard
Culver City, California 90232
sherry.jordan@culvercity.org
FAX: (310) 253-5779

The City would welcome a response at your earliest possible convenience and please do not hesitate to let me know if you have any questions.

Sincerely,

Sherry Jordan,
Project Manager

Enclosed: 1. Notice of Preparation of a Draft Environmental Impact Report for the Proposed Indlewood Oil Field Specific Plan Project
2. Initial Study, Inglewood Oil Field Specific Plan Project
July 2, 2015

Attn: Martin Cole, City Clerk
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

Re: Revised Letter for California Environmental Quality Act Public Resources Code section 21080.3, subd. (b) ; California Assembly Bill 52, Request for Formal Notification of Proposed Projects within the geographic area that is traditionally and culturally affiliated with the Soboba Band of Luiseño Indians.

The purpose of this letter is to request formal notification of proposed projects within the geographic area that is traditionally and culturally affiliated with the Soboba Band of Luiseño Indians, in accordance with Public Resources Code Section 21080.3.1, subd. (b). As of the date of this letter, you have been formally notified that the boundaries of your local government’s jurisdiction fall within the area that is traditionally and culturally affiliated with the Soboba Band of Luiseño Indians. Attached to this letter you will find a traditional use area map that can be used for reference. Due to dual ancestry here at Soboba, which includes both Cahuilla and Luiseño descendants, you will find that our traditional use area map depicts an area that encompasses both territories. Additionally, the Soboba Band has created the following specific requests and formal procedures in accordance with California Assembly Bill 52:

- Formal notice of and information on proposed projects for which your agency will serve as a lead agency under the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq. Pursuant to Public Resources Code section 21080.3.1, subd. (b) shall be sent to The Soboba Band

- Within 14 days of determining that an application for a project is complete or of a decision by your agency to undertake a project, a lead agency must provide formal notification to Cultural Resource Director, Joseph Ontiveros, who is the designated contact and tribal representative for the traditionally and culturally affiliated Soboba Band of Luiseño Indians regarding notifications pertaining to California Assembly Bill 52

Contact Information:

Joseph Ontiveros
Cultural Resource Director
Soboba Band of Luiseño Indians
PO BOX 487
San Jacinto, Ca 92581
O: 951-654-5544 x 4137
C: 951-663-5279
jontiveros@soboba-nsn.gov

- We request that all notices be sent via certified U.S. Mail with return receipt.
- This notice shall consist of a formal written letter that includes:
  - A description of the proposed project
  - The project’s location
  - The lead agency contact information
  - A clear and definitive statement that the tribe has 30 day to request consultation

- Once the Soboba Band has received the notification, we will respond within 30 days as to whether we wish to initiate consultation as prescribed by Public Resources Code section 21080.3.1, subd. (d), the Soboba Band may request consultation, as defined by Public Resources Code section 21080.3.1, subd. (b), pursuant to Public Resources Code section 21080.3.2 to mitigate any project impacts a specific project may cause to tribal cultural resources.

- The lead agency shall begin the consultation process within 30 days of receiving the Soboba Band’s request for consultation and prior to the release of a negative declaration, mitigated negative declaration, or environmental impact statement.

- Once a review of inadvertent discoveries has been completed by the Cultural Resource Director, all information will then be transferred to the Soboba Tribal Council for a final decision and directive.

- In the event that human remains are uncovered, all work in the immediate vicinity will halt and standard procedures will be followed as set forth by law.

On behalf of The Soboba Band of Luiseño Indians, we appreciate your careful considerations and willingness to effectively carry out all requirements associated with AB 52. If you have any further questions or require any clarification, please feel free to contact me at your earliest convenience.

Sincerely,

Joseph Ontiveros
Cultural Resource Director
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov