

PXP

Construction Treatment Plan

Inglewood Oil Field

Baldwin Hills CSD Conditions

E.8.c. and L.7.b.

**WORKING DRAFT SUBJECT TO CHANGE BASED
ON COUNTY REVIEW AND ACCEPTANCE**

May 2009

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1.0 INTRODUCTION

Plains Exploration & Production (PXP) operates the Inglewood Oil Field in the Baldwin Hills zoned District of Los Angeles County. The Inglewood Oil Field covers approximately 1,000 acres and is surrounded by single and multiple family dwellings as well as recreational, institutional, commercial, and industrial uses. To address issues of land use compatibility with surrounding land uses, the Los Angeles County Board of Supervisors recently adopted the Baldwin Hills Community Standards District (CSD) to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and producing oil and gas within the Inglewood Oil Field.

The Construction Treatment Plan has been prepared to ensure the preservation and protection of cultural resources that may be present at the site. It has been prepared in accordance with the requirements of the Community Standards District (CSD) dated October 2008.

The plan is organized as follows:

- Section 2.0 provides background information for the site and includes an overview of the cultural history for the site, the regulatory framework for cultural resource issues, a summary of the CSD ordinance, a general overview of cultural resource artifacts, and the results of previous cultural surveys conducted at the site;
- Section 3.0 discusses the protection and preservation of the Cone Trust House;
- Section 4.0 provides the cultural resources training plan and requirements; and,
- Section 5.0 presents the construction treatment plan.

2.0 BACKGROUND INFORMATION

2.1 CULTURAL HISTORY

The PXP Inglewood Oil Field (Inglewood Oil Field) is located in an unincorporated area within Los Angeles County. Archaeological evidence suggests that the Los Angeles area has been inhabited by Native Americans for at least 13,000 years. Archaeologists have created a temporal chronology of prehistoric cultural periods for the area, which includes the Paleo-Indian/Paleo-Coastal Period (13,500-9,000 years before present), the Millingstone Period (9,000-5,500 years before present), the Early Period (5,500-3,500 years before present), the Middle Period (3,500-800 years before present), and the Late Period (800 years before present - European Contact). The Inglewood Oil Field is located within the Gabrieliño cultural area. Gabrieliño cultural traits include, but are not limited to, the construction of plank canoes, significant investment in near-shore fishing, hereditary leadership, craft specialization, and long distance trade. Native American occupation of the area was dramatically disrupted beginning in the early 1500s by Spanish exploration and the settlement and the rapid expansion of the EuroAmerican population in California associated with the Gold Rush in the mid-1800s. Regardless, Gabrieliño sites may be found in the Los Angeles area including village sites, camp sites, resource exploitation areas, rock art sites, and locations of ritual and/or spiritual activity.

In 1520 Gabrieliño on Santa Catalina Island were encountered by Spanish explorers, but contact with the mainland population did not take place until the expedition of Gaspar de Portolá in 1769. Sustained Spanish colonization of Gabrieliño territory began in 1771 with the establishment of Mission San Gabriel Arcángel. In 1781 the pueblo of Los Angeles was established and much of the open land around the pueblo previously occupied by Gabrieliño was used for grazing livestock. Subsequent to the secularization of the California missions in the early 1800s most of the former mission lands were granted to private landowners. Oil and gas production activities in the Baldwin Hills area began in the early 1900s. The Inglewood Oil Field has been in operation since 1924.

2.2 REGULATORY FRAMEWORK

The California and federal laws and regulations that protect cultural resources include the following:

- Native American Graves Protection and Repatriation Act of 1990
- Archaeological Resources Protection Act of 1979
- American Indian Religious Freedom Act of 1976
- Archaeological and Historic Preservation Act of 1976
- National Environmental Policy Act of 1969
- National Historic Preservation Act of 1966
- Antiquities Act of 1906
- California Environmental Quality Act
- Government Code Section 6253, 6254, 6254.10, 25373 and 37361
- Health & Safety Code Section 7050.5, 7052, 18950-18961

- Penal Code Title 14, Section 622.5
- California Code of Regulations Section 1427
- California Public Resources Code Section 5020 through 5029.5, 5097.9 – 5097.991

In regards to legal penalties for violating these laws and regulations, any person who knowingly excavates, removes, damages or otherwise alters or defaces any cultural resource without a proper permit may be subject to fines and/or imprisonment.

2.3 OVERVIEW OF BALDWIN HILLS CSD REQUIREMENTS

The CSD Ordinance adopted the following provisions for the identification and protection of cultural resources:

- Condition E.8.a: Cone Trust House –*oil operations shall not result in impacts to the Cone Trust House.;*
- Condition E.8.b: Archeological Training –*the operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the oil field. All such construction personnel shall be required to participate in the training and will receive training material prepared by a qualified archaeologist prior to working on ground disturbance activities.*
- Condition E.8.c: Construction Treatment Plan –*the operator shall comply with all provisions of a construction treatment plan, approved by the director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the director. The construction treatment plan shall include any measures requested by the director.*
- Condition L.7.a: Worker Training – *within 120 days following the effective date, or at such later date as may be approved by the director for good cause shown, the operator shall have a qualified archaeologist prepare a the training material referred to in subsection E.8.b. The training material shall include any elements requested by the director.*
- Condition L.7.b: Construction Treatment Plan – *within 180 days following the effective date, or at such later date as may be approved by the director for good cause shown, the operator shall have a qualified archaeologist prepare a construction treatment plan as required by subsection E.8.c.*

2.4 OVERVIEW OF CULTURAL RESOURCE ARTIFACTS

Cultural resources include “historic properties” as defined in the National Historic Preservation Act, “archaeological resource” as defined in the Archaeological Resources Protection Act, and “cultural items” as defined in the Native American Graves Protection and Repatriation Act.

Cultural resources associated with human activities include, but are not limited to, the following:

- Pottery;
- Basketry;
- Bottles;
- Weapons and weapon projectiles;
- Tools;
- Structures or portions of structures over 50 years of age;
- Pit houses;
- Rock paintings;
- Rock carvings;
- Intaglios (art or print carvings);
- Graves;
- Human skeletal materials;
- American folk-life traditions and arts; and,
- Cultural and natural places, select natural resources, and sacred object that have importance for Native Americans.

2.5 PRESENCE OF CULTURAL RESOURCES AT THE INGLEWOOD OIL FIELD

The *Final Environmental Impact Report, Baldwin Hills Community Standards District* (EIR) dated October 2008 included an evaluation of the cultural resources at the Inglewood Oil Field. The results of a records search indicated that no archaeological or Native American cultural resources have previously been identified at the site. In addition to the records search, a Phase I study was performed by qualified archaeologists to identify any existing resources that could potentially be affected by the proposed activities at the site. During the field survey, no prehistoric archaeological sites were identified; however, two historic archaeological sites and a historic architectural resource were identified in the northern portion of the site as follows:

- Historic Site: PXP-1H – consists of a medium- to high-density historic trash scatter site in the northeast portion of the site near La Cienega Boulevard. The eastern portion of the site occupies a low rise that contains a prominent eucalyptus tree, while the western portion lies on a flat bench at the base of a steep and heavily vegetated slope. The site consists of complete and fragmentary soda and liquor bottles, medicine bottles, cosmetic containers, and china. Structural elements, including bricks and concrete, were also identified. Datable bottle base maker marks suggest the refuse was manufactured between 1915 and 1935.
- Historic Site: PXP-2H – consists of a low- to medium-density historic trash scatter site in the northwest portion of the site north of West Los Angeles College. The site occupies a

low knoll in a relatively flat field and consists of fragmentary soda and liquor bottles, medicine bottles, and mason jars. Structural elements, including bricks and concrete, were also identified. One bottle base makers mark was observed with an embossed date of 1935.

- Historic Architectural Resource: Cone Trust House – consists of an approximately 4,100 square foot house that is located in the northern portion of the site. The house was apparently built in 1896 by a member of the Chandler family and was then purchased by Irving and Emma Cone in either the mid-1920s or mid-1930s. The house appears to be a Shingle house, a style of Victorian house that was built between 1880 and 1900. The stone staircases, stone retaining walls, and other landscape features in the vicinity of the house do not appear to be associated with the original house.

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3.0 CONE HOUSE TRUST

The Cone Trust House is located within the CSD and an active drilling area in the Inglewood Oil Field. The house appears to have been built in 1896 by a member of the Chandler family. The house was subsequently purchased by Irving and Emma Cone in the 1920s or 1930s. In accordance with Condition E.8.a. of the CSD, oil operations shall not impact the Cone Trust House. Accordingly, in order to protect and preserve the Cone Trust House, PXP proposes to include a discussion of the significance of the Cone Trust House with all PXP Inglewood Oil Field staff as part of cultural resources sensitivity training.

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4.0 CULTURAL RESOURCES SENSITIVITY TRAINING

PXP staff and workers that will be involved in the excavation activities at the site will be required to attend cultural resources sensitivity training in accordance with Conditions E.8.b. and L.7.a. of the CSD. The objectives of the training are to increase awareness and accountability concerning the importance of PXP's cultural resource-related legal and trust responsibilities and to educate staff regarding the procedures to be implemented if inadvertent cultural resources are encountered during construction activities. The training will be conducted by a professional archaeologist and will include:

- A discussion of the history of the Inglewood Oil Field and surrounding area and a description of the types of cultural resources that may occur within the Inglewood Oil Field including, but not limited to:
 - Pottery;
 - Bottles;
 - Ceramics;
 - Cans;
 - Nails;
 - Projectile points;
 - Stone tools;
 - Structures or portions of structures over 50 years of age;
 - Graves; and,
 - Human skeletal materials.
- A review of PXP employee responsibilities with respect to cultural resources at the site; and,
- A discussion of the protocols to be implemented if cultural resources are inadvertently discovered during activities within the Inglewood Oil Field.

PXP staff and contractors will be required to sign an attendance form to document their completion of the cultural resources sensitivity training and receipt of training materials. The training materials will include a description of the types of artifacts likely to occur in the Inglewood Oil Field, the protocols and points of contact for inadvertent discoveries of cultural resources, and forms for documenting inadvertent discoveries (a copy of the inadvertent discovery form is included in Attachment A and a copy of the training materials is included in Attachment B).

5.0 CONSTRUCTION TREATMENT PLAN

This section presents the Construction Treatment Plan to address the procedures and protocols to be followed in the event that cultural resources and/or human remains are encountered during activities at the site. The plan was developed in accordance with Conditions E.8.c and L.7.b of the CSD. An inadvertent discovery is a cultural resource (e.g., pottery, nails, projectile points, or human remains) that was not previously identified.

The Construction Treatment Plan consists of the following protocols, which shall be implemented if cultural resources are inadvertently discovered during activities within the Inglewood Oil Field:

- If any archaeological artifact is unearthed during construction activities, all activities within 50 feet of the discovery must stop and you must notify your immediate supervisor. In addition, the PXP EH&S staff and others shall be notified in accordance with the communication chart provided in Attachment C.
- Following discovery, an inadvertent discovery form shall be completed to document the discovery and the notification of appropriate PXP staff. A copy of this form is provided in Attachment A.
- All artifacts must remain on site until the proper authorities are notified and the potential significance of the artifact is determined by a professional archaeologist.
- EH&S will contact a qualified archaeologist to assess the significance of the find. If the find is a Native American artifact, the Native American community will be notified and offered the opportunity to inspect the find and, if appropriate, monitor any activity associated with recovery or further investigation of the find. Guidelines for the project to proceed include:
 - Isolated prehistoric finds that consist of fewer than three items per 100 square meters;
 - Isolated historic finds that consist of fewer than three artifacts per 100 square meters (several fragments from a single glass bottle are one artifact);
 - Refuse scatters that are less than 50 years old (scatters containing no material that can be dated with certainty as older than 50 years old);
 - Features that are less than 50 years old (structures such as buildings, wells, equipment);

- Isolated refuse dumps and scatters that are over 50 years old that lack specific associations; and,
 - Isolated mining prospect pits.
 - Placer mining features with no associated structural remains or archaeological deposits
- In the event of inadvertent and accidental discovery or recognition of any human remains, the following steps shall be taken:
- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner is contacted. If the coroner determines the remains to be Native American:
 - a. The coroner shall contact the Native American Heritage Commission within 24 hours.
 - b. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 - c. The descendent may make recommendations for means of treating or disposing of the human remains and any associated grave artifacts.
 - Following regulatory guidance, where the following conditions occur, the Native American human remains and associated grave artifacts shall be reburied on the property outside the project area:
 - a. The Native American Heritage Commission is unable to identify a most likely descendent; or
 - b. The descendent identified fails to make a recommendation within 48 hours of notification; or
 - c. The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.