
IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CULTURAL RESOURCES

1. PALEONTOLOGICAL RESOURCES

ENVIRONMENTAL SETTING

Existing Onsite and Surrounding Paleontological Resources

The project site is located within the Beverly Hills USGS quadrangle. The project area contains surficial deposits of older Quaternary Alluvium derived primarily from the Santa Monica Mountains to the north.¹

No vertebrate fossil localities lie directly within the project site boundaries; however, vertebrate fossil localities are located nearby in the same sediments that occur as surficial deposits in the project area. The closest vertebrate fossil locality in the older Quaternary sediments is Los Angeles County Museum (LACM) 5501, which is located immediately east of the project area south of Olympic Boulevard between Avenue of the Stars and Century Park East. This location produced fossil specimens at shallow but unspecified depths of pond turtle (*Clemmys marmorata*), dog (*Canis*), and horse (*Equus*) fossils. Localities LACM 3355 and LACM 3821, located near the intersection of Wilshire Boulevard and Bedford Drive, produced specimens of fossil horse (*Equus*) and even-toed ungulates (*Artiodactyla*) at depths of 40 feet below the surface. Locality LACM 5833, located northwest of the project area south of Wilshire Boulevard between Thayer Avenue and Westholme Avenue, produced fossils of horse (*Equus*), kangaroo rat (*Dipodomys*), wood rat (*Neotoma*), meadow vole (*Microtus*), and pocket gopher (*Thomomys*), at shallow but unspecified depths.²

Numerous localities in the older Quaternary sediments that have produced fossil specimens typical of the fauna from the Rancho La Brea asphalt deposits are located about 3.5 miles east of the project area.³

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Result in directly or indirectly destroying a unique paleontological resource or site or unique

¹ Written correspondence, Natural History Museum of Los Angeles County, Samuel A. McLeod, Ph.D., Vertebrate Paleontology, July 19, 2005.

² *Ibid.*

³ *Ibid.*

geologic feature.

Furthermore, as set forth in the City of Los Angeles Draft L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) The project would result in the permanent loss of, or loss of access to, a paleontological resource;
and
- (b) The paleontological resource is of regional or statewide significance.

Project Impacts

All portions of the project site have been developed and as such, have been subject to ground disturbing activities such as grading, which could have damaged, destroyed, or removed any paleontological resources that could have been present. Thus, the potential for paleontological resources to occur in those areas is low. However, due to the lack of previous paleontological studies on the project site, it is unknown whether paleontological resources exist at depths that have not been previously excavated.

The proposed project would include the excavation of soil for the construction of several levels of subterranean parking. During the excavation, which would be within the older Quaternary Alluvium, there is a possibility of encountering significant vertebrate fossils. The potential for unknown paleontological deposits to occur in these deposits cannot be ruled out. Without proper care during grading and excavation, unknown resources could be damaged or destroyed. Therefore, project impacts on unknown unique paleontological resources would be potentially significant.

CUMULATIVE IMPACTS

Implementation of the proposed project in combination with the related projects would result in the continued development (or redevelopment) of residential, commercial, and office land uses in the City of Los Angeles. Impacts to paleontological resources tend to be site-specific and are assessed on a site-by-site basis. The extent of the paleontological resources (if any) that occur at the related project sites is unknown and, as such, it is not known whether any of the related projects would result in significant impacts to cultural resources. However, similar to the proposed project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the proposed project's impacts to paleontological resources concluded that, through the implementation of the mitigation measures recommended below, project impacts to paleontological resources would be less than significant. Therefore, the proposed project would not contribute to any potential cumulative impacts, and cumulative impacts to paleontological resources would be less than significant.

MITIGATION MEASURES

Because the proposed project would result in potentially significant impacts to unknown paleontological resources, the mitigation measures listed below are recommended:

- (E-1) The project applicant shall identify a qualified paleontologist prior to any excavation, grading, or construction. The City of Los Angeles Planning Department shall approve the selected paleontologist prior to issuance of the grading permit. The project paleontologist shall attend the pre-grading meeting to discuss how to recognize paleontological resources in the soil during grading activities. The prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying paleontological resources or removing paleontological resources from the project site.
- (E-2) If paleontological resources are encountered during the course of site development activities, work in that area shall be halted and the project paleontologist shall be notified of the find. The project paleontologist shall have the authority to temporarily divert or redirect grading to allow time to evaluate any exposed fossil material. "Temporarily" shall be two working days for the evaluation process.
- (E-3) If the project paleontologist determines that the resource is significant, then any scientifically significant specimens shall be properly collected by the project paleontologist. During collecting activities, contextual stratigraphic data shall also be collected. The data will include lithologic descriptions, photographs, measured stratigraphic sections, and field notes.
- (E-4) Scientifically significant specimens shall be prepared to the point of identification (not exhibition), stabilized, identified, and offered for curation to a suitable repository that has a retrievable storage system.
- (E-5) The project paleontologist shall prepare a final report at the end of the earthmoving activities; the report shall include an itemized inventory of recovered fossils and appropriate stratigraphic and locality data. The project paleontologist shall send one copy of the report to the City of Los Angeles Planning Department; another copy should accompany any fossils, along with field logs and photographs, to the designated repository.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts to paleontological resources would be reduced to a less-than-significant level with the implementation of the recommended mitigation measures.

IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CULTURAL RESOURCES

2. ARCHAEOLOGICAL RESOURCES

The following section summarizes the information provided in the report entitled Results of the Phase I Archaeological Survey 2055 Avenue of the Stars Project, Century City, California (the “Archaeology Report”), prepared by Applied Earth Works, Inc. on September 16, 2005. This Archaeology Report is provided as Appendix D to this Draft EIR.

ENVIRONMENTAL SETTING

Prehistory and Ethnohistory

The following discussion contains an overview of the cultural history of the Los Angeles Plain. It is intended to provide a context within which to evaluate the type, nature, and significance of prehistoric and ethnohistoric sites that may be encountered in the general project area. The following discussion emphasizes the prehistoric chronological development of coastal southern California documented in a report The People of Y'aanga?,⁴ prepared for the Metropolitan Water District of Southern California's Headquarters Project at Union Station. The ethnohistoric setting provides a general overview of the cultural practices of the Gabrieleno Tongva cultural group who occupied the Los Angeles region at the time of historic contact. A detailed presentation of these data is provided in The First Angelinos.⁵ Other native groups that occupied the region and have been directly associated with the historic Mission San Fernando will be discussed in more detail in the Historic Context portion of this section.

Early Cultures

A few archaeologists and nonprofessionals working in southern California have claimed that cultural remains of great antiquity have been found in the region. Most sites of purported great antiquity (in excess of 15,000 years) are centered in the Mojave and Colorado deserts or in coastal southern California. Perhaps the most widely publicized of these sites is the Calico Early Man Site in the desert portion of San Bernardino County.⁶ Sites for which great antiquity is claimed have not been identified in the vicinity of

⁴ Goldberg, S. K, B. J. Adams, C. Denardo, S. A. Williams, M. J. Wyss, M. C. Robinson, J. A. Onken, C. M. Inoway, M. C. Horne, K. Moslak, S. Griset, V. S. Popper, S. L. Martin, M. S. Shackely, T. M. Origer, J. L. McVickar, and Beta Analytic Inc., *The People of Yaanga?: Archaeological Investigations at CA-LAN-1575/H, Metropolitan Water District of Southern California Headquarters Facilities Project. Prepared by Applied EarthWorks, Inc. Hemet, California. Submitted to Metropolitan Water District of Southern California, Los Angeles, 1999.*

⁵ McCawley, W., *The First Angelinos, Malki Museum Press/Ballena Press Cooperative Publications, 1995.*

⁶ Schuiling, W. C. (editor), *Pleistocene Man at Calico, 2nd edition, San Bernardino County Museum Association, Redlands, California, 1979.*

downtown Los Angeles, and most archaeologists in California dismiss the purported “Early Man” period as unsubstantiated by scientific evidence.

The 12,000 to 7,500 B.P. Interval (Terminal Pleistocene/Early Holocene Period)

This interval is characterized by a long period of human adaptation to environmental changes brought about by the transition from the late Pleistocene to the early Holocene. Between 13,000 and 10,000 B.P., climatic conditions became warmer and more arid and Pleistocene megafauna (large animals) gradually disappeared. The early occupants of southern California are believed to have been nomadic large-game hunters whose tool assemblage included percussion-flaked scrapers and knives; large, well-made stemmed, fluted, or leaf-shaped projectile points (e.g., Lake Mojave, Silver Lake); crescentics; heavy core/cobble tools; hammerstones; bifacial cores; and choppers and scraper planes.

The 7,500 to 5,000 B.P. Interval (Middle Holocene Period)

In the coastal and inland regions of southern California, this period of cultural development is marked by the technological advancements of seed grinding for flour and the first use of marine resources, such as shellfish and marine mammals. Overall, the general settlement-subsistence patterns of the Middle Holocene were exemplified by a greater emphasis on seed gathering. Adaptation to various ecological niches, further population growth, and an increase in sedentism typify the subsequent periods of cultural history in southern California. This subsistence orientation, characterized by a heavy dependence on both hunting and plant gathering, continued into the historic period. The artifact assemblage of this period is similar to that of the previous period and includes crude hammerstones, scraper planes, choppers, large drills, crescents, and large flake tools. This assemblage also includes large leaf-shaped points and knives, manos and milling stones used for grinding hard seeds, and nonutilitarian artifacts, such as beads, pendants, charmstones, discoidals, and cogged stones.⁷ The Topanga Complex is perhaps the best known component of the so-called Milling Stone Horizon in the vicinity of the Project region. Aside from the sites in Topanga Canyon, the only evidence of prehistoric occupation of the Los Angeles Basin dating to this interval is an occasional discoidal or cogged stone recovered from sites dating to more recent periods of prehistory.

The 5,000 to 1,500 B.P. Interval (Middle to Late Holocene)

In general, cultural patterns remained similar in character to those of the preceding horizon. However, the material cultural at many coastal sites became more elaborate, reflecting an increase in sociopolitical complexity and efficiency in subsistence strategies (e.g., the introduction of the bow and arrow for

⁷ Kowta, M., *The Sayles Complex: A Late Milling Stone Assemblage from the Cajon Pass and the Ecological Implications of Its Scraper Planes*, University of California Publications in Anthropology 6, Berkeley and Los Angeles, 1969.

hunting). Within the Los Angeles Basin, few sites have been identified that can be placed within this interval of prehistory. The components at CALAN-2 in Topanga Canyon are dated to this period. In addition, several sites south of Ballona Lagoon on the Del Rey bluffs contain a well-developed Intermediate Horizon, defined as a period of diversified subsistence.⁸ Projectile points for the Ballona Bluffs sites are, in some cases, similar to those found at sites in the southeastern California deserts, specifically in the Pinto Basin and at Gypsum Cave. This suggests that the coastal occupants of this period were in close contact with cultures occupying the eastern deserts.

The Post 1,500 B.P. Interval (Late Holocene)

Reliance on the bow and arrow for hunting along with the use of bedrock mortars and milling slicks mark the beginning of the tradition denoted as the “Late Prehistoric Horizon”⁹ and the “Shoshonean Tradition”,¹⁰ dating from about 1500 B.P. (A.D. 500) to the time of Spanish contact (approximately A.D. 1769). Late prehistoric coastal sites are numerous. Diagnostic artifacts include small triangular projectile points, mortars and pestles, steatite ornaments and containers, perforated stones, circular shell fishhooks, and numerous and varied bone tools, as well as bone and shell ornamentation. Elaborate mortuary customs along with generous use of asphaltum and the development of extensive trade networks are also characteristic of this period. The Late Horizon appears to represent increases in population size, economic and social complexity, and the appearance of social ranking.

Ethnohistory

During the prehistoric period, the Los Angeles Basin was inhabited by the Gabrieleno people. The Gabrieleno are characterized as one of the most complex societies in native southern California, second perhaps only to the Chumash, their coastal neighbors to the northwest. This complexity derives from their overall economic, ritual, and social organization.¹¹ The Gabrieleno Tongva, a Uto-Aztecan (or Shoshonean) group, may have entered the Los Angeles Basin as recently as 1500 B.P. Two theories

⁸ Wallace, W.J., *Post Pleistocene Archaeology, 9000 to 2000 B.C. In California*, edited by R. F. Heizer, *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D. C., pp. 25–36/1978.

⁹ Wallace, W.J., *A Suggested Chronology for Southern California Coastal Archaeology*. *Southwestern Journal of Anthropology* 11:214–230, 1955.

¹⁰ Warren, C.N., *Cultural Tradition and Ecological Adaptation on the Southern California Coast*. *Eastern New Mexico University Contributions in Anthropology* 1(3):1–15, 1968.

¹¹ Bean, Lowell J., and C. R. Smith, *Gabrielino*. In *California*, edited by R. F. Heizer, *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C., pp. 538–549, 1978.

prevail: (1) perhaps they arrived from the southern Great Basin or interior California deserts, or (2) that the Gabrieleno Tongva peoples migrated into the Los Angeles region in successive waves over a lengthy period of time beginning as early as 4000 B.P. Gradually these Uto-Aztecan peoples began to displace the previous Hokan-speaking occupants of the southern coastal region. Early ethnographers report that the Gabrieleno Tongva people were flanked by speakers of the Hokan languages: the Chumash to the north and the Diegueño to the south.¹²

In early protohistoric times, the Gabrieleno Tongva occupied a large territory reportedly including the entire Los Angeles Basin. This region encompasses the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern parts of the Santa Ana Mountains, and much of the middle to the lower Santa Ana River. They also occupied the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 residential communities with populations ranging from 50 to 150 individuals. The Gabrieleno Tongva had access to a broad and diverse resource base. This wealth of resources, coupled with an effective subsistence technology, well developed trade network, and ritual system, resulted in a society that was among one of the most materially wealthy and culturally sophisticated cultural groups in California at the time of contact.

Historic Context

The current project area is located in Rancho San Jose de Buenos Aires, one of several Spanish land grants established in the early 1800s. Rancho San Jose de Buenos Aires was granted by Manuel Micheltona, Governor of the Californias, on February 24, 1843, to Maximo Alanis and comprised 4,438 acres.¹³ In 1884, John Wolfskill purchased the rancho for \$40,000. The completion of the Santa Fe Railroad in 1886 sent land prices soaring and Wolfskill sold the land to the Los Angeles and Santa Monica Land and Water Company for \$438,000, more than 10 times the original price.¹⁴ The company built a railroad and platted the town of Sunset. However, the venture failed and, in 1891, the land was quitclaimed back to Wolfskill and the remainder restored to farming.¹⁵

¹² Kroeber, A.L., 1925, *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. Washington, D. C.

¹³ Conner, E. Palmer, *The Romance of the Ranchos*. Title and Insurance Trust Company. Los Angeles, California, 1941.

¹⁴ *Ibid.*

¹⁵ *Ibid.*

In 1926, William Fox, of the Fox Film Corporation acquired 300 acres of open country that included the current project area.¹⁶ The Fox Hills studio originally covered 150 acres and was formally dedicated on August 29, 1926.¹⁷ The \$2,000,000 project included a \$300,000 scenic wall on Santa Monica Boulevard,¹⁸ and various stage sets including American towns and Amazonian villages.¹⁹ Earlier, in July of 1926, the Fox Film Corporation had purchased the patent to the Movietone sound system for recording sound onto film.²⁰ To accommodate the increasing demand for talking motion pictures, construction began on a new plant at the Fox Hills location. Hailed as the “world’s largest talking picture studio”,²¹ the \$10,000,000 facility was constructed between July and October 1928. The new studio encompassed the central 40 acres of the Fox property and was surrounded by a 14-foot high wall. The Fox-Movietone studio was opened on October 28, 1928 and more than 50,000 people attended the dedication ceremony, which was covered by the Los Angeles Times:

During the day thousands visited every nook and corner of the new establishment that is hidden behind a fourteen-foot wall entirely surrounding the studio. Of particular interest to the visitors were the four huge stage buildings; each containing two fully equipped stages and all of the other material required in the production of either sound or silent pictures. The ceremonies were broadcast over the radio and also were filmed by Fox-Movietone.

*The plant includes twenty-seven buildings of reinforced concrete. These range in size and type from the huge stage buildings to the studio cottage of the stars. The gardens are patterned after the famous ones at Versailles, and the outstanding flower or shrub of each State in the Union is planted in the garden.*²²

¹⁶ Wikipedia, 2005 20th Century Fox, website: http://en.wikipedia.org/wiki/20th_Century_Fox Website accessed August 30, 2005.

¹⁷ Los Angeles Times, Studio to Open Publicly Today, p. F1, August 26, 1926.

¹⁸ Los Angeles Times, New Studio Will Open on Sunday, pA2 August 24, 1926.

¹⁹ Los Angeles Times, Studio to Open Publicly Today, pF1 August 26, 1926.

²⁰ Wikipedia, 2005 20th Century Fox, website: http://en.wikipedia.org/wiki/20th_Century_Fox. Website accessed August 30, 2005.

²¹ Los Angeles Times, Fox Sound Studio Nearly Finished, pE1, October 7, 1928.

²² Los Angeles Times, New Fox Studio Thronged, pA1, October 29, 1928.

The Fox Film Corporation and William Fox in particular suffered in the stock market crash of 1929. In 1935, a merger with Twentieth Century Pictures resulted in the formation of the Twentieth Century-Fox Film Corporation and the studios remained in use. Beginning in 1940 and continuing through World War II, the studio grew to 240 acres and purchases included land formerly belonging to the Westwood Hills Golf Course.²³ As shown in Figure IV.E-1, the 1926-1950 Sanborn Fire Insurance Map depicts multiple structures located between Santa Monica Boulevard to the north, West Pico Boulevard to the south, Fox Hills Drive to the west, and public land to the east. Structures depicted include stages, prop storage, and “numerous frame and plaster sets” throughout the lot. Within the current project area the map depicts “scene docks” and “plaster storage.” All of the principal buildings were situated to the northwest and southwest of the current project area.

The Century City development program of the early 1960s resulted in the sale of much of the Twentieth Century-Fox lot. Recognized as the “most expensive land purchase and development program undertaken in the Western United States”²⁴ the buyers, Webb & Knapp, Inc., of New York and Aluminum Co. of America (Alcoa) paid \$43 million for the 280-acre property.²⁵ Bulldozers moved onto the back lot in July of 1961 and demolition of the old sets began.²⁶ Twentieth Century-Fox leased back 80 acres to the south and the current project site was subsumed into the Century City development that included hotels, apartments, office blocks, and shops. The 1966 USGS Beverly Hills 7.5’ topographic quadrangle map depicts the Century Plaza Hotel to the north but no structures within the project site. The 1979 Thomas Guide also depicts the project site with no structures and the parcel appears to have been vacant between 1961 and 1984 when the Century Plaza Tower, now the former St. Regis Hotel was built.

²³ Silverman, Stephen M., *The Fox That Got Away. The Last Days of the Zanuck Dynasty at Twentieth Century Fox.* Lyle Stuart Inc. Secaucus, New Jersey, 1988.

²⁴ *Los Angeles Times, Century City Set to Be Born Today* pB1, April 17, 1961.

²⁵ *Ibid.*

²⁶ *Los Angeles Times, Bulldozers to Topple Make-Believe World,* pWS1, July 16, 1961.

Figure IV.E. Sanborn Map

Methods of Investigation

Limited archival research was undertaken to define prior land use within proximity of the project area and to evaluate the potential for preservation of archaeological deposits. Historical maps, photographs, and other relevant historical documents and literature were gathered from several locations including the following regional facilities:

- Los Angeles Public Library;
- Proquest Database; and
- South Central Coastal Information Center.

The Historical Los Angeles Times database²⁷ provided the majority of the information used to develop the historic context above. Maps and photographs were reviewed at the Los Angeles Public Library.

Previous Archaeological Investigations

The records search results obtained from the South Central Coastal Information Center at Fullerton²⁸ indicate that six cultural resources studies were previously conducted within a half-mile radius of the project site, and that one archaeological site has been reported. This archaeological resource does not lie within the project site. No sites are listed on the archaeological Determination of Eligibility list and no isolated finds were recorded.

In addition, the California Points of Historical Interest (PHI), the California Historical Landmarks (CHL), the California Register of Historic Places (CRHP), the National Register of Historic Places (NRHP), the California State Historical Resources Inventory (HRI), and the City of Los Angeles Cultural Monuments listing were reviewed. The following is a summary of these listings:

- The California Point of Historical Interest list identified no properties within the area specified;
- The California Historical Landmarks register lists no properties within the area specified;
- The California Register of Historic Places identified lists no properties within the area specified;
- The National Register of Historic Places lists no properties within the area specified;

²⁷ Proquest, website: <http://proquest.umi.com>.

²⁸ Written correspondence from Thomas D. Shackford, Staff Researcher, South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, August 1, 2005.

- The City of Los Angeles Cultural Monument register lists no properties within the area specified; and
- The California Historic Resources Inventory list no properties within the area specified.

Among the six cultural resources studies undertaken in proximity to the project site, the most relevant to the current assessment is the construction monitoring reports produced by LSA Associates, Inc. Construction activities within the current Twentieth Century-Fox lot were monitored in 1996 and 1998. An archaeological site (CA-LAN-2479H) was identified north of the intersection of Pico Boulevard and Fox Hills Drive, approximately 0.4 miles south of the current project site. Numerous artifacts were identified during ground-disturbing construction activities and include various bottle and glass fragments, ceramic shards and arc-light carbon rods. Also identified was unconsolidated structural rubble such as roofing shingles, plaster, milled lumber and wire nails. Deposits were distributed evenly throughout the fill and noted at depths as much as 20 feet. LSA concluded that the items were associated with movie sets located within the Twentieth Century-Fox studio. LSA also suggested that the items were buried during circa 1936 construction activities at the studio. Additionally, it was concluded that similar deposits are likely to exist throughout a larger area “probably eventually encompassing the entire area covered by the original Fox Studios.”²⁹

Project Site Inspection

A brief inspection of the project site occurred on August 31, 2005. Currently, the former Century Plaza Tower/St. Regis Hotel is surrounded by paved and landscaped areas. The 30-story Century Plaza Tower was built in 1984 and included 322 rooms and subterranean conference rooms. Renovations were made in 2000 when the building became the St. Regis Hotel.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.

Furthermore, as set forth in the City of Los Angeles Draft L.A. CEQA Thresholds Guide, a project would normally have a significant impact upon an archeological resource or its setting because:

²⁹ LSA Associates, Inc. 1998.

- (a) The archeological resource is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- (b) The archeological resource can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archeological research questions;
- (c) The archeological resource has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- (d) The archeological resource is at least 100-years-old³⁰ and possesses substantial stratigraphic integrity; or
- (e) The archeological resource involves important research questions that historical research has shown can be answered only with archeological methods.

As stated above, CEQA mandates public disclosure of a project's potential impacts on archaeological sites, historic properties, and Native American sacred places. If the project has a potential to impact an archaeological site, the lead agency must determine whether the site is a historic resource. Accordingly, archaeological sites are historic resources when they are "listed in or determined eligible for listing in," the California Register of Historic Resources (CRHR).³¹ The CRHR criteria define a significant cultural resource as one which:

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

³⁰ Although CEQA criteria state that "important archaeological resources" are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires that a site or structure be at least 50-years-old.

³¹ California Register of Historic Resources, Section 15064.5 [a].

Project Impacts

Prehistoric Archaeological Sensitivity

As described previously, although no prehistoric sites have been previously recorded within a one-half mile of the project area, regional site utilization during prehistoric times is known to have occurred. For example, Los Angeles County is within the area of the Late Prehistoric Canaliño culture,³² which later evolved into the protohistoric Gabrielino and Chumash cultures. It is believed that Late Prehistoric/Canaliño occupations of the Arroyo Sequit site first occurred approximately 2,000 years ago and persisted until the Mission Period (circa A.D. 1800 to 1830). Probably one of the richest sites in coastal southern California, the Malibu Site (CA-LAN-264) at the mouth of Malibu Creek, was occupied during this period. Located at Malaga Cove near Santa Monica Bay, it has yielded stratified midden deposit and prehistoric tools such as large mortars and long pestles, *Haliotis* shell fishhooks, tarring pebbles, and steatite vessels.³³

Nonetheless, the integrity of the buried land surface at the project area likely is poor. The construction of subterranean facilities such as parking areas, basements, and conference rooms associated with the Century Plaza Tower/St. Regis Hotel resulted in large-scale excavations during original hotel construction. These activities no doubt caused substantial impact to native subsoil. Undated photographs available at the Los Angeles Public Library depict immense excavations in Century City. Although these photographs do not provide specific locations, they illustrate typical construction methods. Additionally, current site plans provided by the applicant indicate further excavations of 45 feet below current grade to accommodate subterranean parking. If utilized prehistorically, archaeological deposits could remain intact. Yet, no known prehistoric sites exist in the immediate proximity to the project area. Based on available evidence, the potential for intact prehistoric archaeological deposits must be considered low. However, any discovery of prehistoric archaeological remains would be considered a potentially significant archaeological discovery.

Historical Archaeological Sensitivity

Possible human habitation during the Rancho period and site utilization by Twentieth Century Fox studios likely resulted in the formation of historical archaeological deposits within the project area. Construction methods discussed above undoubtedly resulted in the removal of such deposits and the potential for historical archaeological deposits to have survived is also considered low. However, isolated

³² Rogers, D.B., *Prehistoric Man on the Santa Barbara Coast, Santa Barbara Museum of Natural History Special Publications 1, Santa Barbara, 1929.*

³³ Walker, E.F., *Five Prehistoric Sites in Los Angeles County, California, Publications of the F. W. Hodge Anniversary Publication Fund 6, Los Angeles, 1951.*

pockets of previously undisturbed native sediments may exist. Under these circumstances historical archaeological deposits may have survived. Any discovery of Rancho period or studio period era would be considered a potentially significant archaeological discovery.

CUMULATIVE IMPACTS

Implementation of the proposed project in combination with the related projects would result in the continued development (or redevelopment) of residential, commercial, and office land uses in the City of Los Angeles. Impacts to archaeological resources tend to be site-specific and are assessed on a site-by-site basis. The extent of the archaeological resources (if any) that occur at the related project sites is unknown and, as such, it is not known whether any of the related projects would result in significant impacts to cultural resources. However, similar to the proposed project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the proposed project's impacts to archaeological resources concluded that, through the implementation of the mitigation measure recommended below, project impacts to archaeological resources would be less than significant. Therefore, the proposed project would not contribute to any potential cumulative impacts, and cumulative impacts to archaeological resources would be less than significant.

MITIGATION MEASURES

Because little potential for encountering significant archaeological deposits exists, monitoring of ground disturbing activities should not be required. However, in the event of an unanticipated discovery the following mitigation measure is recommended:

- (E-6) If an archaeological resource is encountered, construction must be diverted and a qualified archaeologist must be consulted. An archaeologist must assess significance of the exposed archaeological discovery in accordance with California Register criteria. If a significant resource is identified during construction, the State Historic Preservation Office must be consulted regarding treatment options.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts to archaeological resources would be reduced to a less-than-significant level in the event that a discovery of prehistoric archaeological remains would occur with the implementation of the recommended mitigation measure.