
4.2 Cultural Resources (Historical Resources)

4.2.1 Introduction

This cultural resources section addresses the proposed Project's impacts on historical resources. The existing historical resources in the vicinity of the proposed Project are described below, along with the methodology and the regulatory framework that guided the evaluation of historical resources. Impacts to historical resources that would result from the proposed Project are identified, along with any measures to mitigate significant effects of the proposed Project, if needed. This section is based in part on more comprehensive information contained in **Appendix D**.

Section 4.7.3, *Construction Traffic and Equipment Noise and Vibration*, of this EIR addresses the potential for construction-related vibration to adversely affect historical resources located in proximity to the proposed construction activities. As demonstrated in that section, vibration-related impacts on nearby historical resources would be less than significant.

Prior to the preparation of this EIR, an Initial Study (included as **Appendix A** of this EIR) was prepared using the CEQA Environmental Checklist Form to assess potential environmental impacts to cultural resources. For two of these screening criteria, the Initial Study found that the proposed Project would result in a "Less Than Significant Impact" and, thus, no further analysis of these topics in an EIR was required. Based on the Initial Study screening criteria related to cultural resources, the following potential impacts do not require any additional analysis in this EIR:

- Potential impacts on archaeological resources were evaluated and determined to have a less than significant impact in the Initial Study. Results of the records search conducted between 2014 and 2015 for the LAX Landside Access Modernization Program from the South Central Coastal Information Center indicated no archaeological resources have been recorded at the Project site or within the immediate vicinity.¹ Further, the Project improvement sites consist of highly disturbed areas that have long been, and are currently being, used for airport and other highly developed uses. Any resources that may have existed on the improvement sites at one time are likely to have been displaced and, as a result, the overall sensitivity of the sites with respect to buried resources is low. LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's Archaeological Treatment Plan ATP.² LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the proposed Project as part of LAWA's general construction contract specifications and tenant agreements related to new construction. With implementation of the ATP, monitoring for the presence of previously-unknown archaeological resources would occur during construction, when warranted, and discoveries of archaeological resources would be handled in accordance with the ATP and with all applicable laws and regulations. As a result, impacts of the proposed Project on archaeological resources would be less than significant and no further evaluation in this EIR is required.

¹ The study area for the archaeological resources assessment for the LAX Landside Access Modernization Program included areas within and to the east of the CTA, as well as within the northern and western portions of the airport property, some of which are adjacent to the Project site; refer to Figure 2 in City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix I - Archaeological and Paleontological Resources Assessment Report, prepared by PCR Services Corporation, September 2016.

² City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/archaeological_treatment_plan.ashx?la=en&hash=9833B1960E1AE662518B5517DB42CA42F55FAE0E.

- Potential impacts on human remains, including those interred outside of dedicated cemeteries, were evaluated and determined to have a less than significant impact in the Initial Study. Based on discussions with a representative of the Gabrielino Tongva Indians of California Tribal Council, there is no information to suggest that there are known tribal human remains that would be affected by the proposed Project.³ As stated above, the Project site is located within a highly urbanized area and has been subject to disturbance by airport operations and development. Thus, surficial human remains resources that may have existed at one time have likely been displaced by these disturbances. While discovery of human remains in artificial fill deposits within the Project site is unlikely, proposed excavations could impact previously unknown buried human remains. However, LAWA would comply with existing guidance as to the treatment of any human remains that are encountered during construction excavations, including the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code, and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the Public Resources Code. Through compliance with state and local regulations, disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant and no further evaluation in this EIR is required.

In accordance with Assembly Bill 52, Appendix G of the State CEQA Guidelines identifies tribal cultural resources as a separate resource from other cultural resources. Based on the analysis in the Initial Study, (**Appendix A** of this EIR), and for reasons described in Section XVIII therein, the potential for the proposed Project to cause a substantial adverse change in the significance of a tribal cultural resource was determined to be less than significant and this topic does not require any additional analysis in this EIR. However, subsequent to LAWA's publication of the CEQA Notice of Preparation/Initial Study for the proposed Project in April 2019, as part of the separate government-to-government consultation between the FAA and Tribal governments during preparation of the Environmental Assessment under the National Environmental Policy Act (NEPA) for the proposed Project, the Gabrielino Band of Mission Indians – Kizh Nation expressed concerns to FAA regarding potential impacts to Tribal resources that could be discovered during excavation and construction of the LAX Airfield and Terminal Modernization Project. In response to these concerns and at the request of FAA, LAWA agreed to implement the following measures prior to initiation of Project-related grading or excavation activities to ensure the expertise of the local tribal monitor is respected:

- LAWA would consult with a Tribal monitor to determine if an action is subject to archaeological and tribal monitoring, which would be determined based on specific design information, information on the depth of fill and soil disturbance, and the probability of encountering cultural or archaeological resources.
- LAWA would require the construction contractor to have a Tribal monitor present during excavation/ground disturbance activities for any areas that have a medium to high probability of containing undisturbed soils determined by the depth of the ground disturbing activities.
- The Tribal monitor must be approved by the Gabrieleno Band of Mission Indians – Kizh Nation Tribal Government and be listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the LAX area.
- The Tribal monitor would work independently from any other cultural resource monitor for each element of the proposed Project to monitor ground disturbing activities identified at Project initiation to have the potential for encountering archaeological resources in undisturbed soils.

³ Dorame, Robert, Chairman, Gabrielino Tongva Indians of California Tribal Council, *Personal Communication*, March 7, 2019.

- Upon discovery of any Tribal Cultural Resources, construction activities would cease in the immediate vicinity of the find until the find can be assessed and, if the resources are Native American in origin, previously-agreed-upon procedures for handling the find would be implemented.

4.2.2 Methodology

A historic resources assessment was performed for the proposed Project by Historic Resources Group (HRG) personnel who meet the Secretary of the Interior's Professional Qualification Standards in the disciplines of architectural history and history (see **Appendix D**). Historical resources considered include prehistoric or historic buildings, sites, districts, structures, or objects that meet criteria of significance as established by the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and local jurisdictions. Their evaluation of historic significance was based on a review of existing historic designations, research of the relevant historic contexts, and analysis of the eligibility criteria and integrity thresholds for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument. The historical resources assessment utilized a two-step methodology involving research and field investigation.

The research component of the assessment used primary and secondary sources related to the development history of LAX and its immediate surrounding area. Sources included historic building permits, photographs, aerial photographs, and site plans; published local histories; previous environmental review documents and historic resources evaluations for LAX; California State Historic Resources Inventory (HRI) for Los Angeles County; California Department of Parks and Recreation HRI Forms; and applicable results from SurveyLA, the City of Los Angeles' comprehensive historic resources survey now ongoing.

HRG performed on-site inspections in 2015 of property owned by LAWA. Their fieldwork focused on confirming previous findings relating to historical resources associated with the LAX Landside Access Modernization Program and identifying any additional potential historical resources (see **Appendix D**).

4.2.3 Existing Conditions

4.2.3.1 Regulatory Setting

Historical resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification and, in certain instances, protection of historical resources. Additionally, state and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act of 1966, as amended (NHPA; 54 United States Code 300101 et seq.); CEQA; California Register of Historical Resources (Public Resources Code 5024.1); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.171 et seq.) are the primary federal, state, and local laws governing and affecting preservation of historical resources of national, state, regional, and local significance.⁴

4.2.3.1.1 Federal

National Register

The National Register was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation's cultural resources and to

⁴ Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171 et seq., *Cultural Heritage Ordinance*, effective April 2, 2007. Available: <http://preservation.lacity.org/sites/default/files/Cultural%20Heritage%20Ordinance.pdf>.

indicate what properties should be considered for protection from destruction or impairment."⁵ The National Register recognizes properties that are significant at the national, state, and/or local levels. To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The National Register has established Criteria for Evaluation to determine the significance of a resource:

1. It is associated with events that have made a significant contribution to the broad patterns of our history
2. It is associated with the lives of persons significant in our past
3. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
4. It yields, or may be likely to yield, information important in prehistory or history⁶

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria. However, the National Register does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of American history, architecture, archaeology, engineering, and culture can clearly be demonstrated. In addition to meeting the Criteria for Evaluation, a property must have integrity. "Integrity is the ability of a property to convey its significance."⁷ According to National Register Bulletin 15, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

To retain historic integrity, a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.⁸

In assessing a property's integrity, the National Register criteria recognizes that properties change over time; therefore, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.⁹

NHPA Section 106 Consultation

Section 106 of the NHPA requires federal agencies to take into account the effects of their "undertakings" on historic properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is implemented in ACHP regulations (36 Code of Federal Regulations Part 800). If it is determined that a project would have impacts on historic resources that are eligible for the National Register, the FAA would

⁵ 36 Code of Federal Regulations, Section 60.2, *Effects of Listing under Federal Law*.

⁶ U.S. Department of Interior, National Park Service, *National Register Bulletin 16, How to Complete the National Register Registration Form*, revised 1997. Available: <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>. This bulletin contains technical information on comprehensive planning, survey of cultural resources, and registration in the National Register.

⁷ U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 44. Available: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁸ U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 44. Available: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁹ "A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register." U.S. Department of Interior, National Park Service, *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, 1995, p. 46. Available: <https://www.nps.gov/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

be required to undertake Section 106 consultation, which includes consultation with the State Historic Preservation Officer (SHPO), before issuing federal approvals for the proposed Project.

Under Section 106 consultation, the federal agency first determines whether a proposed project is an undertaking that could affect historic properties. An undertaking is defined in Section 106 as a “project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.” (36 CFR § 800.16(y).) Historic properties are properties that are included in the National Register or that meet the criteria for the National Register. (36 CFR § 800.16(l)(1).) If the agency’s undertaking could affect historic properties, the agency determines the scope of appropriate identification efforts and then proceeds to identify historic properties in the area of potential effects (APE). The agency reviews background information, consults with SHPO, and conducts additional studies as necessary. Section 106 review gives equal consideration to listed properties and unlisted properties meeting National Register criteria.

If the federal agency finds that historic properties are present, it proceeds to assess possible adverse effects. The agency, in consultation with SHPO, makes an assessment of adverse effects on the identified historic properties. Adverse effects occur when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion in the National Register. Examples of adverse effects include physical destruction or damage; alteration not consistent with the Secretary of the Interior’s Standards; relocation of a property; change of use or physical features of a property’s setting; and visual, atmospheric, or audible intrusions. If a property is restored, rehabilitated, repaired, maintained, stabilized, remediated or otherwise changed in accordance with the Secretary of the Interior’s Standards, then it will not be considered an adverse effect.

If the federal agency and SHPO agree that there would be no adverse effect, the agency proceeds with the undertaking and any agreed-upon conditions. If they find that there would be an adverse effect, the federal agency begins consultation to seek ways to avoid, minimize, or mitigate the adverse effects. The federal agency then consults with SHPO and other parties. The ACHP may participate in consultation in some circumstances. Consultation usually results in a Memorandum of Agreement, which outlines agreed-upon measures that the agency would take to avoid, minimize, or mitigate the adverse effects. In some cases, the consulting parties may agree that no such measures are possible, but that the adverse effects must be accepted in the public interest. The results of the Section 106 process would be presented in the Draft Environmental Assessment prepared in accordance with NEPA.

4.2.3.1.2 State

California Register and California Environmental Quality Act

The California Register was created by Assembly Bill 2881, which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”¹⁰ The criteria for eligibility for the California Register are based on National Register criteria.¹¹ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.¹² Per Instructions for Recording Historical Resources published by the California Department of Parks and Recreation, Office of Historic Preservation (OHP), physical evidence of

¹⁰ California Public Resources Code, Section 5024.1(a).

¹¹ California Public Resources Code, Section 5024.1(b).

¹² California Public Resources Code, Section 5024.1(d).

human activities more than 45 years old may be recorded for purposes of inclusion in OHP's filing system although, similar to the National Register, resources less than 45 years old may also be filed.¹³

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register
- California Registered Historical Landmarks from No. 770 onward
- California Points of Historical Interest (CPHI) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register¹⁴

Other resources that may be nominated to the California Register include:

- Individual historical resources
- Historical resources contributing to historic districts
- Historical resources identified as significant in historical resources surveys with significance ratings of Categories 1 through 5
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone¹⁵

To be eligible for the California Register, a historical 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
4. Has yielded, or may be likely to yield, information important in prehistory or history

Additionally, a historical resource must retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance.¹⁶ Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must also be judged with reference to the particular criteria under which it is proposed for eligibility. It is possible that a historical resource may not retain sufficient integrity to meet the criteria for listing in the National Register but may still be eligible for listing in the California Register.¹⁷

Under CEQA, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.¹⁸ This statutory standard involves a two-part inquiry. The first part is a determination of whether the project involves a historical resource. If it does, the inquiry addresses whether the project may cause a "substantial adverse change

¹³ California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995.

¹⁴ California Public Resources Code, Section 5024.1(d).

¹⁵ California Public Resources Code, Section 5024.1(e).

¹⁶ 14 California Code of Regulations, Chapter 11.5, Section 4852(c), *Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources*.

¹⁷ 14 California Code of Regulations, Chapter 11.5, Section 4852(c), *Types of Historical Resources and Criteria for Listing in the California Register of Historical Resources*.

¹⁸ California Public Resources Code, Section 21084.1.

in the significance" of the resource. State CEQA Guidelines Section 15064.5 provides that, for the purposes of CEQA compliance, the term "historical resources" shall include the following:¹⁹

- A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the California Register
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets one of the criteria for listing on the California Register.
- The fact that a resource is not listed in or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

4.2.3.1.3 Local

City of Los Angeles Conservation Element of the General Plan

The Conservation Element includes provisions, policies, and objectives for the preservation and protection of historical sites. Chapter II, Section 5 of the City of Los Angeles General Plan Conservation Element (adopted 2001) contains the following objectives and policies applicable to the proposed Project:

Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

- Policy: Continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

City of Los Angeles Cultural Heritage Ordinance

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962 (Los Angeles Administrative Code, Section 22.130) that defines Los Angeles Historic-Cultural Monuments for the City. According to the ordinance, City of Los Angeles Historic-Cultural Monuments are sites, buildings, or structures of particular historical or cultural significance to the City of Los Angeles in which the broad cultural, economic, or social history of the nation, state, or community is reflected or exemplified, including sites and buildings associated with important personages or that embody certain distinguishing architectural characteristics and are associated with a notable architect. City of Los Angeles Historic-Cultural Monuments are regulated by the City's Cultural Heritage Commission and the City Council.

¹⁹ 14 California Code of Regulations, Section 15064.5(a), *Determining the Significance of Impacts to Archaeological and Historical Resources*.

The City of Los Angeles Cultural Heritage Ordinance establishes criteria for designating local historical resources as City of Los Angeles Historic-Cultural Monuments. Pursuant to the Ordinance, a City of Los Angeles Historic-Cultural Monument is any site, building, or structure of particular historic or cultural significance to the City of Los Angeles that meets one or more of the following criteria:

1. Reflects or exemplifies the broad cultural, economic, or social history of the nation, state, or community
2. Is identified with historic personages or with important events in the main currents of national, state, or local history
3. Embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction
4. Is a notable work of a master builder, designer, or architect whose individual genius influenced his or her age

LAX Preservation Plan²⁰

LAWA recognizes that LAX contains unique historic resources and is committed to preserving its historic resources in a methodical and thoughtful manner. To that end, LAWA has developed a Preservation Plan for LAX resources that identifies all historic resources on LAX property; identifies historic resources that LAWA commits to preserving; provides guidance on the rehabilitation of historic buildings, structures, objects, and sites located on LAX property; and creates a process for review of future projects with respect to historic resources. LAWA has committed to utilizing the LAX Preservation Plan to assist LAWA in preserving and evaluating its historic resources appropriately.

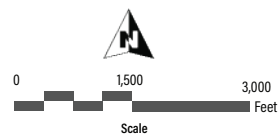
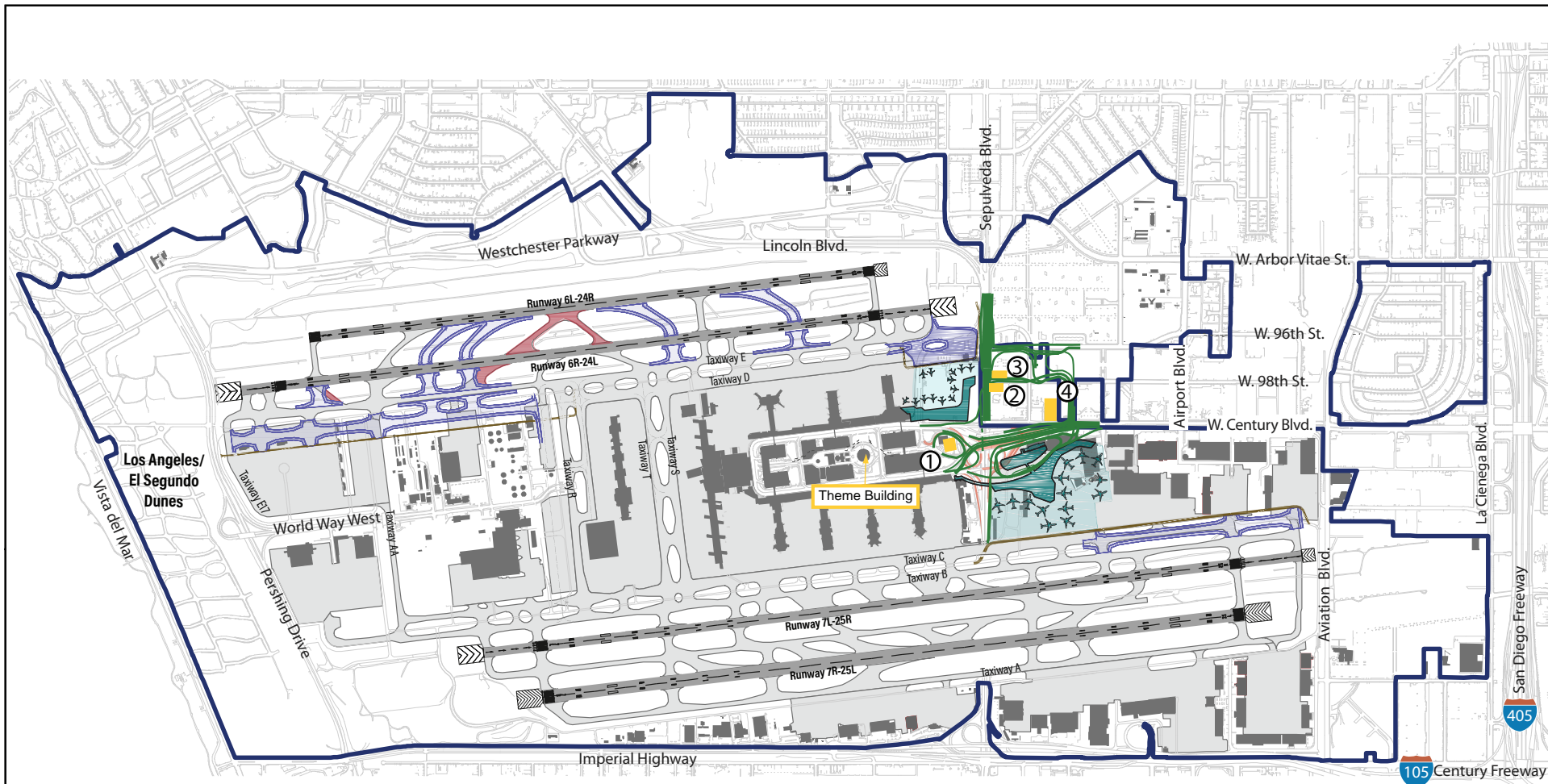
LAWA has identified 14 resources at LAX as individually eligible for designation as historic resources, including two resources already designated. Of these resources, LAWA has committed to the long-term preservation of seven resources. In addition to the historical resources identified in the LAX Preservation Plan, LAWA has identified other historical properties in close proximity to LAX in environmental documents prepared for previous projects. Of the on- and off-airport resources identified as individually eligible for designation as historic resources, four properties are located in proximity to Project components. The identified historical resources are as follows:

1. 1961 Airport Traffic Control Tower at the eastern end of the CTA
2. Union Savings and Loan Building at 9800 S. Sepulveda Boulevard
3. Former Aircraft School Building at 9700 S. Sepulveda Boulevard
4. McCulloch Building at 6151 W. Century Boulevard

Figure 4.2-1 depicts the locations of these identified historical resources. These historical resources are further discussed in Section 4.2.3.2.2.

Of the four resources located within the Project vicinity, only one, the 1961 Airport Traffic Control Tower, is located on LAX property and is subject to the provisions of the LAX Preservation Plan. The 1961 Airport Traffic Control Tower is one of the seven resources identified for preservation in the Plan.

²⁰ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, prepared by Historic Resources Group, September 2016. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.



Source: Sources: Ricondo & Associates, Inc., April 2020 (basemap); Los Angeles World Airports, January 2020 (Airport Layout Plan); CDM Smith, April 2020 (airport property line and historic resources)
Prepared by: CDM Smith, October 2020

Legend

- LAX Property Boundary
- Airfield Improvements
- Terminal and Related Improvements
- Taxiway to be Removed or Decommissioned
- Vehicle Service Road
- Roadway Improvements
- Roadway to be Demolished
- Eligible Historical Resource

Eligible Historic Resources

- ① 1961 Airport Traffic Control Tower
- ② Union Savings and Loan
9800 S. Sepulveda Boulevard
- ③ Former Aircraft School Building
9700 S. Sepulveda Boulevard
- ④ McCulloch Building
6151 W. Century Boulevard

4.2.3.2 Environmental Setting

4.2.3.2.1 Historical Development of LAX

As outlined in the historic resources assessment (see **Appendix D**), prior to its development as an airport, the land currently occupied by LAX was part of Rancho Sausal Redondo, which had been granted to Antonio Ygnacio Avila by the Mexican government in 1837. By 1894, this property was known as the Bennett Rancho, and was used to grow crops. Pioneering aviators began using a portion of the Bennett Rancho as a landing strip during the 1920s and the City of Los Angeles leased 640 acres of the field for the Los Angeles Municipal Airport in August 1928. The airport constructed its first permanent building – Hangar One – in 1929 and development continued that year with the construction of administrative offices, a runway, and additional hangars. Airport facilities were located at the southeast corner of the current LAX property, with buildings clustered near the intersection of present-day Aviation Boulevard and Imperial Highway.

Plans for a new modern airport were derailed by World War II. Wartime production activity at the aircraft manufacturing plants on and around the airport intensified dramatically. In 1942, the federal government assumed control of the airport and the Army Air Corps stationed planes and men at the field. In 1944, the City proposed a master plan with two stages of development: an initial stage to immediately accommodate commercial operations, followed by a long-range expansion to the west. The initial stage, known as the “Intermediate Terminal Facility” opened on the north side of the airfield in 1946 and ultimately consisted of four passenger terminals, new administrative buildings, and hangars for individual airlines. Los Angeles Municipal Airport was officially re-named Los Angeles International Airport (LAX) on October 11, 1949.

In 1956, a new master plan for a “Jet Age” airport was developed. The innovative scheme incorporated a U-shaped access road flanked by six ticketing buildings that, in turn, were connected via subterranean passageways to remote satellite buildings containing the actual boarding gates. Passenger amenities were located in the individual satellites. The center of the “U” contained parking, an administrative building surmounted by a state-of-the-art airport traffic control tower (ATCT) at the extreme east end of the site, a Theme Building restaurant in the center of the site, and support facilities. Inspired by the aesthetics of the Jet Age, the Theme Building quickly became an internationally-recognized symbol and centerpiece of the new airport.

Continuing growth of both commercial and freight traffic at LAX has resulted in numerous improvements over the last few decades including a second deck of the U-shaped access road to separate arriving and departing passengers, expansion and remodeling of the existing terminal buildings, new parking structures, the Tom Bradley International Terminal (1984), and a new ATCT (1996). Currently, a new Midfield Satellite Concourse is under construction west of the Tom Bradley International Terminal. In addition, improvements within and east of the CTA are underway as part of the LAX Landside Access Modernization Program, including an elevated Automated People Mover system, a consolidated rental car facility, intermodal transportation facilities, and roadway improvements.

4.2.3.2.2 Eligible Historical Resources

Eligible historical resources located on the Project site are identified in **Table 4.2-1** and shown on Figure 4.2-1. As shown on the figure, there are no historical resources located within the Project site. However, four properties that have been identified as eligible for historic listing are in the near vicinity. These include the 1961 ATCT at the eastern end of the CTA; the former McCulloch Building (now H Hotel/Homewood Suites) at 6151 W. Century Boulevard; the former Union Savings and Loan Building at 9800 S. Sepulveda Boulevard; and the former Aircraft School Building at 9700 S.

Sepulveda Boulevard. Additional details associated with the four properties can be found in **Appendix D**. All are considered historical resources herein for the purposes of CEQA.

Table 4.2-1 Summary of Historical Resources						
Map #	Property ¹	Address	Date	National Register	California Register	Los Angeles Historic-Cultural Monument
1	1961 Airport Traffic Control Tower	1 World Way	1961	Ineligible	Ineligible	Eligible
2	Union Savings and Loan Building	9800 S. Sepulveda Boulevard	1964	Ineligible	Eligible	Eligible
3	Former Aircraft School Building	9700 S. Sepulveda Boulevard	1941-1945	Eligible	Eligible	Eligible
4	McCulloch Building	6151 W. Century Boulevard	1963	Ineligible ²	Eligible	Eligible
Source: Appendix D of this EIR. Notes: ¹ The 1961 Airport Traffic Control Tower is owned by LAWA. All the other properties listed are privately owned. ² During the environmental review of the LAX Landside Access Modernization Program, FAA determined that the McCulloch Building was ineligible for the National Register. SHPO did not formally concur with this determination. Rather, because the LAX Landside Access Modernization Program would not affect the property, SHPO and FAA agreed to consider it as eligible for purposes of that project.						

1961 Airport Traffic Control Tower

The 1961 Administration Building (currently known as the Clifton A. Moore Administration Building) and ATCT form the eastern terminus of the central axis of the CTA. It sits on an oval island ringed by access roads. The building is Mid-century Modern in style and is of steel frame and reinforced concrete construction. It is composed of two main parts: an office building forming a low base, and the actual control tower that rises above. Due to extensive alteration of the two-story Administration portion and alterations to the Tower portion, the building does not retain sufficient integrity to be eligible for listing in the National Register. Given the overall alteration of its architectural design, the building is also not eligible for listing in the California Register. However, the Tower appears eligible for local listing as a City of Los Angeles Historic-Cultural Monument and is treated herein as a historical resource for the purposes of CEQA.

Union Savings and Loan Building

An eight-story office building is located at 9800 S. Sepulveda Boulevard on the southeast corner of Sepulveda Boulevard and W. 98th Street. The building was originally constructed for Union Savings and Loan in 1964. This mid-rise commercial office building was identified as eligible for the California Register and for local listing as a City of Los Angeles Historic-Cultural Monument in 2012. It was not found eligible for listing in the National Register. The property is treated herein as a historical resource for the purposes of CEQA.

Former Aircraft School Building

The property at 9700 S. Sepulveda Boulevard was originally developed by the Los Angeles City High School District in 1941 for use as a National Defense Training School. Beginning in 1945, the property was referred to as the Los Angeles City Aircraft School with the Los Angeles City School District as its owner. The property is currently owned by the West Los Angeles College (a community college within the Los Angeles Community College District). The primary structure on the site, hereafter referred to as the former Aircraft

School Building, is used by the college for storage of movie set props and instruction to support its Film/Television Production Crafts program. One course per quarter is held at the facility. The remainder of the property is currently used for commercial parking.

Evidence suggests that the property has a long historic association with training in the aircraft trades in service of the explosive post-World War II growth of the aerospace industry in Southern California. Constructed for civil defense training just eight months prior to the Japanese attack of Pearl Harbor, the property continued to be used for training in the aircraft trades following World War II. As such, it appears the property is eligible for the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument as a rare intact example of an aircraft training facility from the 1940s and one of the oldest remaining buildings associated with aviation located in the vicinity of the airport.

Only the rectangular bow-truss building appears to have retained sufficient integrity to convey the historic significance of the property. Because it appears eligible for the National Register, California Register, and for local listing as a City of Los Angeles Historic-Cultural Monument, 9700 S. Sepulveda Boulevard is treated herein as a historical resource for the purposes of CEQA.

McCulloch Building

The subject property, referred to as the McCulloch Building, is located at 6151 W. Century Boulevard on the north side of W. Century Boulevard between Vicksburg Avenue and Avion Drive. The 12-story office building was constructed in 1963 as part of “International Airport Center,” a large commercial development along the north side of W. Century Boulevard. In 2013, SurveyLA identified the building as eligible for listing in the National Register, the California Register, and as a City of Los Angeles Historic-Cultural Monument.

6151 W. Century Boulevard was converted from office space to hotel use in 2017. In 2017, after this conversion and after CEQA review of the LAX Landside Access Modernization Program, the FAA, as part of their oversight of environmental review of the LAX Landside Access Modernization Program under NEPA and Section 106 of the NHPA, determined that 6151 W. Century Boulevard was not eligible for the National Register because the integrity of the building was diminished when it was converted.²¹ As part of the NEPA process, the State Historic Preservation Officer (SHPO) requested additional information to concur or disagree with FAA’s determination of eligibility. Because the LAX Landside Access Modernization Program would not affect the property, SHPO considered the property as eligible for purposes of that undertaking. The FAA does not evaluate properties relative to the California Register or for the City of Los Angeles Historic-Cultural Monument designation.

As noted above, the building was converted to hotel use in 2017. The hotel conversion included some alteration of the façades. Following this conversion, the building’s eligibility has not been reevaluated. For purposes of this document, it is assumed that the conversion did not alter the previous eligibility findings. Therefore, because the building was previously found eligible for the California Register and for local listing as a City of Los Angeles Historic-Cultural Monument, it is considered a historical resource herein for the purposes of CEQA.

²¹ U.S. Department of Transportation, Federal Aviation Administration, *Los Angeles International Airport Landside Access Modernization Program Final Environmental Assessment*, Appendix H.2 - SHPO Coordination Letters, December 2017. Available: <https://www.lawa.org/connectinglax/automated-people-mover/documents>.

4.2.4 Thresholds of Significance

A significant impact on historical resources would occur if the proposed Project would:

Threshold 4.2-1 Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5.

This threshold is from Appendix G of the State CEQA Guidelines. In accordance with Section 15064.5(b)(1) of the State CEQA Guidelines, a “[s]ubstantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Further, the Guidelines provide that the significance of an historical resource is considered to be materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the National Register, California Register, and/or local register.

4.2.5 Project Impacts

4.2.5.1 Impact 4.2-1

Summary Conclusion for Impact 4.2-1: Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5. This would be a *less than significant impact* for construction and operations.

4.2.5.1.1 Impacts to Individual Historical Resources

1961 ATCT

As discussed in Section 4.2.3.2.2, the 1961 ATCT has been substantially altered but is still recognizable as a control tower and retains sufficient integrity to be eligible for local listing as a City of Los Angeles Historic-Cultural Monument. Although the majority of the terminal area and landside improvements of the proposed Project would be located at a substantial distance from the 1961 ATCT (over 200 feet to Concourse 0 and over 750 feet to the Terminal 9 parking garage and the westernmost edge of Terminal 9), the roadways that currently encircle the 1961 Administration Building, the closest of which is located approximately 130 feet from the ATCT, would be modified and nearby roadways would be demolished. None of the Project-related improvements would require demolition or alteration of the 1961 ATCT. The 1961 ATCT would remain in its original location at the eastern entry to the CTA and retain its historic axial relationship with the Theme Building. The Tower would remain substantially taller than Concourse 0, Terminal 9, the additional APM station adjoining Terminal 9, and the grade-separated ramps and roadways associated with the proposed landside improvements.

Because the proposed Project would introduce a new concourse, terminal, APM station, and new roadway improvements in the near vicinity of the 1961 ATCT, its immediate surroundings would be altered. However, the immediate surroundings of the 1961 ATCT have undergone numerous major and minor alterations since both the initial completion of the CTA in 1962 and its transformation since 1981. Moreover, the larger setting is not critical to understanding the historic significance of the 1961 ATCT because its immediate surroundings have been substantially altered since its original construction and the alteration and new construction associated with the proposed Project would not be substantially different from previous changes and alterations. For these reasons, all of the relevant aspects of integrity would be unaffected by the proposed Project, so that the historic integrity of the 1961 ATCT would be retained. While the proposed Project would alter the larger surroundings of the 1961 ATCT, this alteration would not materially impair the building such that it can no longer convey its historic significance.

Because the proposed Project would not result in physical alteration of the structure and materials of the 1961 ATCT, it would remain eligible for listing as a City of Los Angeles Historic-Cultural Monument. The remaining physical materials and form of the 1961 ATCT would remain intact, and the building would continue to convey its historic significance. Therefore, the proposed Project would not result in significant impacts to the 1961 ATCT.

Union Savings and Loan Building

As discussed in Section 4.2.3.2.2, the former Union Savings and Loan Building at 9800 S. Sepulveda Boulevard is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Elements of the proposed Project in closest proximity to the Union Savings and Loan Building are largely confined to the proposed terminal area and landside elements, including the following:

- Concourse 0, which would be located directly west of the Union Savings and Loan Building across Sepulveda Boulevard, replacing a surface parking lot
- New elevated roadways north of the Union Savings and Loan Building on the northern side of 98th Street and on the western side of Sepulveda Boulevard across the street from the building

Although the majority of the terminal area and landside improvements of the proposed Project would be located at a distance from the Union Savings and Loan Building (over 200 feet to Concourse 0 and over 1,000 feet to the Terminal 9 parking garage), a new elevated roadway would be located approximately 75 feet north of the building. None of the proposed improvements, including the new elevated roadway, would require demolition or alteration of the Union Savings and Loan Building. The Union Savings and Loan Building would retain all of its character-defining features.

Elevated roadways associated with the proposed landside improvements would partially obscure views of the north and west façades. At eight stories, however, the Union Savings and Loan Building would be over three times the height of the elevated roadways and all of its public-facing façades would remain discernible despite partial blocking of views from the west and north. After construction of the elevated roadways, the Union Savings and Loan Building would remain intact and continue to convey its historic significance. Construction of the elevated roadways would not result in a significant impact to the Union Savings and Loan Building.

Because the proposed Project would introduce a new concourse and elevated roadway improvements in the near vicinity of the Union Savings and Loan Building, its immediate surroundings would be altered. However, the immediate surroundings of the Union Savings and Loan Building have undergone numerous alterations since its original construction as new buildings were constructed and surrounding existing buildings were demolished to make way for surface parking lots. Moreover, the larger setting is not critical to understanding the historic significance of the Union Savings and Loan Building because its immediate surroundings have been substantially altered since its original construction and the alteration and new construction associated with the proposed Project would not be substantially different from previous changes and alterations. For these reasons, all of the relevant aspects of integrity would be unaffected by the proposed Project, so that the historic integrity of the Union Savings and Loan Building would be retained. While the proposed Project would alter the larger surroundings of the Union Savings and Loan Building, this alteration would not materially impair the building such that it can no longer convey its historic significance.

Because the proposed Project would not result in physical alteration of the structure and materials of the Union Savings and Loan Building, it would remain eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. The character-defining features and form of the Union Savings and Loan Building would remain intact, and the building would continue to convey its historic

significance. Therefore, the proposed Project would not result in significant impacts to the Union Savings and Loan Building.

Former Aircraft School Building

As discussed in Section 4.2.3.2.2, the former Aircraft School Building at 9700 S. Sepulveda Boulevard is eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument. Elements of the proposed Project in closest proximity to the former Aircraft School Building are confined to the proposed terminal area and landside elements including the following:

- Concourse 0, which would be located west of the former Aircraft School Building across Sepulveda Boulevard, replacing a surface parking lot
- New elevated roadways on the north side of 98th Street providing access from Sepulveda Boulevard into the CTA

Although the majority of the terminal area and landside improvements of the proposed Project would be located at a distance from the former Aircraft School Building (with the closest, Concourse 0, approximately 380 feet away), elevated roadways would be located approximately 45 feet west and approximately 65 feet south of the building. None of the proposed improvements, including the new elevated roadways, would require demolition or alteration of the former Aircraft School Building. The former Aircraft School Building would retain all of its character-defining features.

Elevated roadways associated with the proposed landside improvements would obscure views of the south façade. Views from the west would remain. After construction of the elevated roadways, the former Aircraft School Building would remain intact in its current location and would continue to reflect its historic significance.

Because the proposed Project would introduce a new concourse and elevated roadway improvements in the near vicinity of the former Aircraft School Building, its immediate surroundings would be altered. However, the immediate surroundings of the former Aircraft School Building have undergone numerous alterations since its original construction as new buildings were constructed and surrounding buildings were demolished to make way for surface parking lots. Moreover, the larger setting is not critical to understanding the historic significance of the former Aircraft School Building because its immediate surroundings have been substantially altered since its original construction and the alteration and new construction associated with the proposed Project would not be substantially different from previous changes and alterations. For these reasons, all of the relevant aspects of integrity would be unaffected by the proposed Project, so that the historic integrity of the former Aircraft School Building would be retained. While the proposed Project would alter the larger surroundings of the former Aircraft School Building, this alteration would not materially impair the building such that it can no longer convey its historic significance.

Because the proposed Project would not result in physical alteration of the structure and materials of the former Aircraft School Building, it would remain eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument. The character-defining features and form of the former Aircraft School Building would remain intact, and the building would continue to convey its historic significance. Therefore, the proposed Project would not result in significant impacts to the former Aircraft School Building.

McCulloch Building

As discussed in Section 4.2.3.2.2, the former McCulloch Building at 6151 W. Century Boulevard is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. (In recent years the McCulloch Building has been altered through renovations associated with its conversion to the H Hotel/Homewood Suites. The building's eligibility was not reevaluated following its

conversion to a hotel use in 2017. This analysis assumes that the McCulloch Building still retains its historical significance.) Elements of the proposed Project in closest proximity to the McCulloch Building are confined to the proposed terminal area and landside elements including the following:

- Terminal 9, which would be located southeast of the Sepulveda Boulevard/Century Boulevard intersection
- Access improvements in conjunction with the construction of Terminal 9, including an added station on the previously-approved APM line, and improvements to nearby roadways
- New elevated roadways to the east of the McCulloch Building along the future “A” Street

Although the majority of the terminal area and landside improvements of the proposed Project would be located at a distance from the McCulloch Building (approximately 375 feet to the Terminal 9 parking garage and approximately 475 feet to Terminal 9), a new elevated roadway would be located approximately 55 feet south and 100 feet east of the building. None of the proposed improvements, including the new elevated roadway, would require demolition or alteration of the McCulloch Building. The McCulloch Building would retain all of its character-defining features.

Elevated roadways associated with the proposed Project would be adjacent to the McCulloch building to the south and east, partially obscuring views of the south and east façades. At 12 stories, however, the McCulloch Building would be over twice the height of the elevated roadways and all of its public-facing façades would remain discernible despite partial blocking of views by the elevated roadways. After construction of the elevated roads, the McCulloch Building would remain intact and continue to convey its historic significance. Construction of the elevated roadways would not result in a significant impact to the McCulloch Building.

Because the proposed Project would introduce a new terminal and elevated roadway improvements in the near vicinity of the McCulloch Building, its immediate surroundings would be altered. However, the immediate surroundings of the McCulloch Building have undergone numerous alterations since its original construction as new buildings were constructed. Moreover, the larger setting is not critical to understanding the historic significance of the McCulloch Building because its immediate surroundings have been substantially altered since its original construction. For these reasons, all of the relevant aspects of integrity would be unaffected by the proposed Project, so that the historic integrity of the McCulloch Building would be retained. While the proposed Project would alter the larger surroundings of the McCulloch Building, this alteration would not materially impair the building such that it can no longer convey its historic significance.

Because the proposed Project would not result in physical alteration of the structure and materials of the McCulloch Building, it would remain eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. The character-defining features and form of the McCulloch Building would remain intact, and the building would continue to convey its historic significance. Therefore, the proposed Project would not result in significant impacts to the McCulloch Building.

4.2.5.1.2 Summary of Impacts

Based on the above, impacts on historical resources from construction and operation of the proposed Project would be ***less than significant***.

4.2.5.1.3 Mitigation Measures

Because the proposed Project would result in a ***less than significant impact*** to historical resources located in the near vicinity of the Project, no mitigation is required for construction or operations.

4.2.5.1.4 Significance of Impact After Mitigation

As indicated above, no mitigation is required to address historical resources. The proposed Project would result in a ***less than significant impact*** for construction and operations.

4.2.6 Cumulative Impacts

The geographic scope of cumulative impacts related to cultural resources consists of the Project improvement sites, inclusive of the construction staging areas, and parcels in close proximity to the Project improvement sites. As discussed above, there are four historical resources located within the near vicinity of the proposed Project. Implementation of the proposed Project would not have any significant impacts on these historical resources. Therefore, the proposed Project would not contribute to cumulative impacts to historical resources.

4.2.7 Summary of Impact Determinations

Table 4.2-2 summarizes the impact determinations of the proposed Project related to cultural resources (historical resources), as described above in Sections 4.2.5 and 4.2.6. Impact determinations are based on the significance criteria presented in Section 4.2.4, and the information and data sources cited throughout Section 4.2.

Table 4.2-2 Summary of Impacts and Mitigation Measures Associated with the Proposed Project Related to Cultural Resources (Historical Resources)			
Environmental Impacts	Impact Determination	Mitigation Measures	Level of Significance After Mitigation
Impact 4.2-1: Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5. This would be a <i>less than significant impact</i> for construction and operations.	Construction: Less than Significant Operations: Less than Significant	No mitigation is required	Construction: Less than Significant Operations: Less than Significant

This page intentionally left blank.