
4.2 Cultural Resources

4.2.1 Introduction

This cultural resources section addresses the proposed project's impacts on historical resources. The existing historical resources in the project area 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.

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. Based on the analysis in the Initial Study, and for reasons described in the introduction to this chapter, the potential for the proposed project to cause a substantial adverse change in the significance of an archaeological resource, to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or to disturb any human remains, including those interred outside of formal or dedicated cemeteries, was determined to be less than significant and these topics do not require any additional analysis in this EIR.¹⁴²

4.2.2 Methodology

A historic resources assessment was performed 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. 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 or California Register, or designation as a City of Los Angeles Historic-Cultural Monument (LAHCM). 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 Los Angeles International Airport (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; and California Department of Parks and Recreation HRI Forms.

HRG performed on-site inspections of the project site and surrounding area in 2015. Their fieldwork focused on the assessment of historic integrity and the identification of character-defining features for structures located on or adjacent to the project site that could be affected by the proposed project (see Appendix C).

¹⁴² 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. Similar to archaeological and paleontological resources, based on the analysis in the Initial Study and for reasons described in the introduction to this chapter, 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.

4.2 Cultural Resources

4.2.3 Existing Conditions

4.2.3.1 Regulatory Context

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.); California Environmental Quality Act (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.¹⁴³

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 indicate what properties should be considered for protection from destruction or impairment."¹⁴⁴ 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 four 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; or
4. It yields, or may be likely to yield, information important in prehistory or history.¹⁴⁵

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."¹⁴⁶ 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.

¹⁴³ 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>.

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

¹⁴⁵ 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/Nr/publications/bulletins/pdfs/nrb16a.pdf>. This bulletin contains technical information on comprehensive planning, survey of cultural resources, and registration in the National Register.

¹⁴⁶ 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/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

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.¹⁴⁷

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.¹⁴⁸

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. They are neither technical nor prescriptive, and cannot be used to make essential decisions about which features of the historic building should be saved and which can be changed. However, once treatment is selected – preservation, rehabilitation, restoration, or reconstruction – the Standards provide treatment approaches and philosophical consistency to the work. Choosing the most appropriate treatment for a building requires careful decision making about a building's historical significance as well as taking into account a number of other considerations, including relative importance in history, physical condition, proposed use, and mandated code requirements.

Rehabilitation, the most common treatment, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

¹⁴⁷ 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/NR/PUBLICATIONS/bulletins/pdfs/nrb15.pdf>.

¹⁴⁸ "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>.

4.2 Cultural Resources

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.¹⁴⁹

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."¹⁵⁰ The criteria for eligibility for the California Register are based on National Register criteria.¹⁵¹ 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.¹⁵² Per Instructions for Recording Historical Resources published by the California Department of Parks and Recreation, Office of Historic Preservation (OHP), physical evidence of 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.¹⁵³

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; and
- 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 Register.¹⁵⁴

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

- Individual historical resources;
- Historical resources contributing to historic districts;

¹⁴⁹ U.S. Department of Interior, National Park Service, *Secretary of the Interior's Standards for Rehabilitation*. Available: <https://www.nps.gov/tps/standards/rehabilitation.htm>, accessed September 4, 2016.

¹⁵⁰ California Public Resources Code, Section 5024.1(a).

¹⁵¹ California Public Resources Code, Section 5024.1(b).

¹⁵² California Public Resources Code, Section 5024.1(d).

¹⁵³ California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995.

¹⁵⁴ California Public Resources Code, Section 5024.1(d).

- Historical resources identified as significant in historical resources surveys with significance ratings of Categories 1 through 5; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.¹⁵⁵

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

Additionally, an historical resource must retain enough of its historic character or appearance to be recognizable as an historical resource and to convey the reasons for its significance.¹⁵⁶ 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 an 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.¹⁵⁷

Under CEQA, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."¹⁵⁸ This statutory standard involves a two-part inquiry. The first part is a determination of whether the project involves an historical resource. If it does, the inquiry addresses whether the project may cause a "substantial adverse change 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:¹⁵⁹

- 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

¹⁵⁵ California Public Resources Code, Section 5024.1(e).

¹⁵⁶ 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*.

¹⁵⁷ 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*.

¹⁵⁸ California Public Resources Code, Section 21084.1.

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

4.2 Cultural Resources

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.

Under CEQA, generally a project that follows the Secretary of the Interior’s standards shall be considered to have mitigated a significant impact on the historical resource to a level that is less than significant. CEQA Guidelines Sections 15064.5(b)(3), 15126.4(b)(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 LAHCMs for the City. According to the ordinance, LAHCMs 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. LAHCMs are regulated by the City's Cultural Heritage Commission and the City Council.

The City of Los Angeles Cultural Heritage Ordinance establishes criteria for designating local historical resources as LAHCMs. Pursuant to the Ordinance, an LAHCM 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.

City of Los Angeles Historic Preservation Overlay Zone

The City of Los Angeles enacted the Historic Preservation Overlay Zone (HPOZ) Ordinance in 1979, which is a planning tool that enables the designation of historic districts. An HPOZ is an area of the city that is designated as containing structures, landscaping, natural features, or sites having historic, architectural,

cultural, or aesthetic significance. Although most districts are primarily residential, many have a mix of single-family and multi-family housing, and some include commercial and industrial properties. Individual buildings in an HPOZ need not be of landmark quality on their own. It is the collection of a cohesive, unique, and intact collection of historic resources that qualifies a neighborhood for HPOZ status.

LAX Preservation Plan¹⁶⁰

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 five buildings, one structure, and one object that will be preserved on LAX property. These historical resources are as follows:

- Hangar One
- The Theme Building
- 1961 Airport Traffic Control Tower (ATCT)
- The Proud Bird Restaurant
- Quonset hut at 6030 Avion Drive
- World War II Munitions Bunker
- Terminal 6 Sign Tower

Of the above seven historical resources, only the Quonset hut at 6030 Avion Drive is located on or in the vicinity of the proposed project site.

The remaining historical resources on LAX property and under LAWA jurisdiction identified as historically significant in the LAX Preservation Plan consist of individually eligible resources (one of which is the combination of 6000-6016 and 6020-6024 Avion Drive, part of the last remaining buildings of the Intermediate Terminal Facility, discussed in Section 4.2.3.2 below), a small historic district, and a contributor to an off-site historic district. LAWA has determined that commitment to the long-term preservation of these remaining historical resources has the potential to substantially interfere with continued airport operations due to issues such as their location, size, building type, or type of construction. Although not identified for preservation, the LAX Preservation Plan includes procedures for implementation of projects that involve the rehabilitation, reuse, alteration, or demolition of the remaining historically significant resources. For any project that requires either extensive alteration (such that the resource would no longer convey its historic significance) or demolition, notification to the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) is required. Submitted plans to the OHR must include a plan to fully document the historic resource prior to alternation or demolition. OHR is required to review the documentation plan and submit any written comments within 15 working days from the date the documents were received.

¹⁶⁰ 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, February 2017. Available: <https://cloud1law.a.app.box.com/s/ia03fbbop9u07dek6u8jxdr2hua33sdh>.

4.2 Cultural Resources

4.2.3.2 Existing Conditions

4.2.3.2.1 Setting

Early Land Use and Airport Development

As outlined in the historic resources assessment (see Appendix C), prior to its development as an airport, LAX was part of Rancho Sausal Redondo, which had been granted to Antonio Ygnacio Avila by the Mexican government in 1837. Typical of the Spanish and Mexican land grant ranchos, the land was used for cattle ranching and sheep grazing. After the Mexican-American War (1846-1848) and subsequent annexation of California by the United States, the Rancho Sausal Redondo changed hands a number of times and was combined with other properties, which were later disaggregated. In 1894, a 2000-acre portion of the property was leased to local farmer Andrew B. Bennet. This property became known as the Bennett Rancho, and was used to grow crops.

Airport Development 1928-1941

Pioneering aviators began using a portion of the Bennett Rancho as a landing strip during the 1920s. At the same time, Los Angeles business leaders recognized the need for a municipal airport with facilities that exceeded those of the neighboring airports in Burbank, Glendale, and Santa Monica. The Bennett Rancho was promoted as a location for a Los Angeles municipal airport by realtor William W. Mines, after which the site became known as “Mines Field.” After Mines Field was selected as the location for the 1928 National Air Races, the City of Los Angeles leased 640 acres of the field for the Los Angeles Municipal Airport in August 1928.

In 1928, the Los Angeles Department of Airports (DOA) was established to administer the airport. 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.

Although intended as a regional airport for commercial air service, the Los Angeles Municipal Airport serviced only private pilots, flying schools and small aircraft manufacturers for several years. In 1935, the airport was improved with grading, runway construction, and a new sewer line under the direction of the Emergency Relief Administration. Two years later, the airfield was further improved under the Works Progress Administration. Plans to further upgrade for commercial airline services were halted with the onset of World War II.

The War Effort 1942-1944

The federal government assumed control of the airport in 1942, soon after the Japanese attack on Pearl Harbor. The airport was taken over for military use for the duration of World War II. Activities were focused on the needs of overseas combat operations and production at the aeronautical manufacturing companies located on and around the airport increased dramatically. A detachment from the 4th Fighter Command was stationed at the field and a mess hall, officer’s quarters, and barracks were built for the Army Air Corps north of Imperial Highway and west of Sepulveda Boulevard. Airport buildings, including on-site or nearby manufacturing facilities now considered crucial to the war effort, were wrapped in camouflage.

During the war, naval gun batteries were constructed along the Pacific Coast as defensive fortifications in case of enemy attack on the mainland the DOA secured commitments from the major American commercial airlines to relocate to Los Angeles Municipal Airport after the war with the creation of a master plan for improvements to the airport. The plan included expansion of the airfield and construction of new terminals and administration buildings. In 1942-1943, a coastal defense battery unit – dubbed the “El Segundo Battery” – was erected in the coastal dunes west of the airport to protect military operations

at the airport. Other improvements were made during this timeframe, including installation of an instrument landing system and extension of the runway.

The Department of Airports created a master development plan for the airport in early 1943, proposing westward expansion of the air field and construction of new terminals and administration buildings at the north of the airport property along Century Boulevard. Commitments from the major American commercial airlines to relocate to Los Angeles Municipal Airport were secured. Finalized in 1944, the new master plan proposed two phases of development: an initial stage to immediately accommodate commercial operations and a subsequent, long-range expansion to the west.

The “Intermediate Terminal Facility” 1945-1960

The project site is in an area first developed for the airport immediately after World War II which became known as the “Intermediate Terminal Facility.” In 1945, Los Angeles voters passed a bond issue providing 12.5 million dollars for new airport development and construction of temporary facilities for commercial airline operations immediately commenced. Four wood-framed buildings were constructed on the north side of the airport to house airport administration along with three passenger terminals. The Intermediate Terminal Facility complex also included surface parking and an extension of the runways.

Additional office and hangar buildings were constructed by the airlines. By 1947, five major airlines had opened for business at the Los Angeles Municipal Airport. Western Airlines, a pioneering Los Angeles area airline incorporated in 1925, established its national headquarter operations at Los Angeles Airport at 6040 Avion Drive at that time. Western was previously headquartered at Burbank Airport for many years.

Amenities such as newsstands, tobacco shops, a barbershop, a restaurant, medical center, laundry, cocktail bar and lounge, and a garage were added to the Intermediate Terminal Facility, as needed. The Civil Aeronautics Administration designated Los Angeles’ airport an “international-express class” airport after determining its facilities adequate for international, intercontinental, and non-stop domestic flights. By 1947, six major airlines were operating at the airport. Los Angeles Municipal Airport was officially re-named Los Angeles International Airport (LAX) on October 11, 1949.

Los Angeles’ postwar economic growth would effectively mandate continued improvements and expansion of the airport. Between 1947 and 1952, the number of travelers using or passing through the airport increased over 50 percent. By 1950, all facilities were operating beyond their capacity. Using airport revenue and some federal funding the airport was able to make several upgrades to the Intermediate Terminal Facility including runway expansions, terminal building expansions, more parking facilities, and a 72-foot tall control tower added in 1951. As fully constructed, the Intermediate Terminal Facility included eight major buildings arranged in a J-shaped configuration deeply set back from Century Boulevard. Surface parking lots fronted Century Boulevard with Avion Drive and Airport Boulevard giving access to parking and the Intermediate Terminal Facilities buildings from Century Boulevard.

The Intermediate Terminal Facility was developed as an interim solution to transition LAX from a local, largely non-commercial airport at Mines Fields into the primary international airport for Southern California. Terminals and support services constructed for the Intermediate Terminal Facility were understood to be “temporary” in that they were quickly constructed to facilitate operation as an international airport while long-range planning and the ultimate construction of more permanent facilities could take place. That said, the Intermediate Terminal Facility operated as Los Angeles International Airport until the early 1960s while long-range planning for the airport focused on an area west of the Intermediate Terminal Facility, which would ultimately become today’s Central Terminal Area (CTA). The Intermediate Terminal Facility proved the viability of international air travel from Los Angeles proper and established Los Angeles International Airport as the primary airport for Southern California.

4.2 Cultural Resources

The CTA has remained the hub of passenger service activity at LAX since its opening in 1961. Passenger service was phased out at the Intermediate Terminal Facility once the CTA became operational. By 1972, only the hangar and maintenance facilities buildings at 6000-6016 Avion Drive (originally constructed for American Airlines), 6020-6024 Avion Drive (originally constructed for United Airlines), and 6040 Avion Drive (originally constructed for Western Airlines), and some small, ancillary buildings remained of the Intermediate Terminal Facility. All other buildings had been razed and largely replaced by air cargo facilities. Western Airlines expanded its corporate headquarters and aircraft maintenance facilities at 6040 Avion Drive in 1963 and 1972. Western Airlines merged with Delta Air Lines in 1986 and the “Western” brand name was discontinued. 6000-6016 Avion Drive and 6020-6024 Avion Drive continue to operate as maintenance facilities today; 6040 Avion Drive is currently a cargo facility.

An aerial photograph showing the LAX Intermediate Terminal Facility circa 1947 is provided in **Figure 4.2-1**.

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 4.2-2**. As shown in Table 4.2-1, two resources on the proposed project site appear to be historically significant: the two buildings at 6000-6016 and 6020-6024 Avion Drive, and the Quonset hut. LAWA is planning to relocate the Quonset Hut. This relocation is planned as part of LAWA’s ongoing management of historic resources at LAX and is consistent with the preservation of this resource outlined in the LAX Preservation Plan. The relocation will occur independently of the proposed project. Therefore, this resource is not evaluated in this section.¹⁶¹ The resource at 6000-6016 Avion Drive and 6020-6024 Avion Drive is further described below.

Property	Location	Year Built	NR	CR	LAHCM
6000-6016 and 6020-6024 Avion Drive (association with the Intermediate Terminal Facility)	On Project Site	1945 to 1947	Ineligible	Eligible	Eligible
Quonset hut at 6030 Avion Drive	On Project Site	1947	Eligible	Eligible	Eligible
Source: Appendix C of this EIR. Key: NR = National Register of Historic Places. CR = California Register of Historical Resources. LAHCM = City of Los Angeles Historic-Cultural Monument.					

¹⁶¹ A detailed description of the Quonset hut is provided in the LAX Preservation Plan.



Source: City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Appendix S-G: Supplemental Section 106 Report, April 2004. Prepared by: CDM Smith, January 2018.

LAX UAL East Aircraft Maintenance and GSE Project

Aerial View of LAX Intermediate Terminal Facility (1947)

Figure
4.2-1

6000-6016 Avion Drive and 6020-6024 Avion Drive (1945 to 1947)

The project site is dominated by two maintenance, office, and hangar buildings located at 6000-6016, and 6020-6024 Avion Drive (see Figure 4.2-2 and **Figure 4.2-3**). 6000-6016 Avion Drive is a one- and two-story utilitarian building of steel and concrete construction. The building is irregular in plan with a flat roof. The primary north-facing façade exhibits a varied massing with projecting one- and two-story volumes. A double-door, fully glazed metal frame storefront provides the primary entrance. Fenestration is primarily metal-frame divided light hopper windows. Two loading bays with wood doors are also visible on the first floor. The south, airfield-facing portion of the building is of steel frame shed construction and contains a series of hangar bays open to the airfield. Alterations include a projecting metal-frame, glazed addition on the north façade and some replacement doors and windows.

6020-6024 Avion Drive is a one- and two-story utilitarian building of steel and concrete construction. The building is irregular in plan with a flat roof. The primary north-facing façade is dominated by a two-story office volume featuring a recessed double-door entry. Fenestration is primarily metal-frame multi-light hopper windows. A single-story projecting volume with loading dock is attached at the building's eastern end. The south-facing façade contains a series of truck loading bays clad in corrugated steel. Alterations include red-brick decorative trim on the north façade, replacement doors and windows, and additions to the south façade.

6000-6016 and 6020-6024 Avion Drive, along with 6040 Avion Drive located west of the project site, are the last remaining buildings of the Intermediate Terminal Facility, constructed between 1945 and 1947 to temporarily house airport administration and airline offices, passenger terminals, hangars, and aircraft service facilities. The Intermediate Terminal Facility buildings lined Avion Drive, which looped around a central surface parking lot south of Century Boulevard. The facility originally consisted of four wood frame buildings, one housing the airport administration, weather service, and Civil Aeronautics Administration, and the other three serving as passenger terminals. Additional buildings were constructed by airlines for their own offices and hangars. The three surviving buildings are part of the latter group. Each originally consisted of two stories of airline administrative offices facing Avion Drive, with hangars behind.

Operation of the Intermediate Terminal Facility provided the transition of the airport from a small regional facility into the primary international airport for Southern California. The three surviving Intermediate Terminal Facility buildings represent an important milestone in the evolution of Los Angeles International Airport and its establishment as a viable concern. These buildings are, therefore, significant under National Register Criterion A, California Register Criterion 1, and LAHCM criteria for their association with events that have made a significant contribution to the broad patterns of Los Angeles history.

As noted above, only three buildings remain of the Intermediate Terminal Facility. One of these, the former Western Airlines facility at 6040 Avion Drive (located west of the project site), has been substantially altered by two large additions and alteration of the primary façade. This building no longer conveys the period during which the Intermediate Terminal Facility was active and, therefore, is not eligible for listing in the National Register or California Register, or for local designation as an LAHCM. The two other buildings, 6000-6016 and 6020-6024 Avion Drive (located within the project site), have also both undergone some alteration and do not retain sufficient integrity for listing in the National Register. However, resources lacking sufficient integrity for listing in the National Register may still be eligible for listing in the California Register. Although the two intact, surviving Intermediate Terminal Facility buildings at 6000-6016 and 6020-6024 Avion Drive do not retain sufficient integrity to be eligible for the National Register, both do retain most of their original massing, cladding, fenestration and entrance openings. Therefore, they retain sufficient integrity to be eligible for listing in the California Register and for designation as an LAHCM. Together, they are considered two component parts of a single historical resource, significant for its association with the Intermediate Terminal Facility period at LAX.



6000-6016 Avion Drive - Looking southeast at the north-facing façade



6020-6024 Avion Drive — Looking southwest at the north-facing façade

Source: Historic Resources Group, November 2017.
Prepared by: CDM Smith, March 2018.

LAX UAL East Aircraft Maintenance
and GSE Project

6000-6016 Avion Drive and
6020-6024 Avion Drive Photographs

Figure
4.2-3

4.2.4 Thresholds of Significance

A significant impact on historical resources would occur if the proposed project would result in:

- A substantial adverse change in the significance of an “historical resource” as defined by State CEQA Guidelines Section 15064.5(a). Substantial 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. The significance of an historical resource is 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.

This threshold is derived from Appendix G of the State CEQA Guidelines.

In addition, the following thresholds related to historical resources from the L.A. CEQA Thresholds Guide are applicable to the proposed project:¹⁶²

A project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance would occur if the project would involve:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and [historical/architectural] significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

4.2.5 Impacts Analysis

As discussed in Section 4.2.3.2 above, investigation of the project site identified two buildings at 6000-6016 and 6020-6024 Avion Drive that together appear eligible for listing in the California Register and for designation as an LAHCM. The project site also contains a Quonset hut at 6030 Avion Drive that is eligible for listing in the National Register and California Register and for designation as an LAHCM. As previously noted, the Quonset hut is planned for relocation to a different location on the airport by LAWA prior to, and independent of, the proposed project. The Quonset hut would, therefore, not be affected by the proposed project.

The proposed project would involve demolition of 6000-6016 and 6020-6024 Avion Drive, which together have been found to be eligible for listing in the California Register and for designation as an LAHCM. Demolition of 6000-6016 and 6020-6024 Avion Drive would result in a significant impact to an historical resource.

Demolition of an historical resource cannot be mitigated to a less-than-significant level. (Public Resources Code [PRC] Section 15126.4(b)(2)) However, pursuant to the PRC, documentation of an historical resource, by way of historic narrative, photographs, or architectural drawings, can serve to reduce the effect of demolition of the resources, even though such documentation will not mitigate the effects to a point where clearly no significant effect on the environment would occur. According to the California

¹⁶² City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

4.2 Cultural Resources

Office of Historic Preservation, “CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance. In this context, recordation serves a legitimate archival purpose.” When data recovery is the only feasible mitigation, studies shall be deposited with the California Historical Resources Regional Information Center (CHRIS).

The LAX Preservation Plan specifies the procedures to be followed in the event of demolition of a historical resource. Specifically, demolition of a historic resource will require notification to OHR, including submittal of a documentation plan that fully documents the historic resource prior to demolition. OHR is required to review the documentation plan and submit any written comments within 15 working days from the date the documents are received. LAWA will comply with the procedures outlined in the adopted LAX Preservation Plan. Nevertheless, even with compliance with these procedures, the impact of the proposed project on historical resources would remain significant.

4.2.6 Cumulative Impacts

The cumulative impacts analysis evaluates the impacts of the project on historical resources in conjunction with other development projects at/adjacent to LAX, as listed in Table 3-1.

As noted in Section 4.2.5, the proposed project would result in a significant impact to an historical resource, 6000-6016 and 6020-6024 Avion Drive, by resulting in the demolition of the buildings. None of the cumulative projects listed in Table 3-1 is located in close proximity to the historical resource located at 6000-6016 and 6020-6024 Avion Drive (see Figure 3-1). Therefore, no cumulative impacts to this historical resource would occur.

Moreover, the proposed project would not have a direct or indirect impact on any other historical resources located in the general project area, such as the Theme Building, the 1961 ATCT, or the Terminal 6 Sign Tower. All of these resources are located within the LAX CTA, over one third of a mile east of the proposed project site, and separated from the project site by Sepulveda Boulevard and the ramps leading into and out of the CTA. Therefore, the proposed project would not contribute to any cumulative impacts to these resources.

4.2.7 Mitigation Measures

As indicated in Section 4.2.5, impacts of the proposed project on historical resources would be significant. No feasible mitigation measures are available to further reduce the impact to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan.

4.2.8 Level of Significance After Mitigation

No feasible mitigation measures are available that would reduce impacts to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan. Therefore, impacts to historical resources from the proposed project would be significant and unavoidable.