
4.2 Cultural Resources

4.2.1 Introduction

This cultural resources section addresses proposed project impacts on historical resources, archaeological resources, paleontological resources, and disturbance of human remains (hereafter referred to as ‘cultural resources’). The potential for the proposed project to result in impacts to tribal cultural resources is evaluated in Section 4.3, *Tribal Cultural Resources*, of this EIR.

The existing cultural resources in the project area are described below, along with the methodology and the regulatory framework that guided the evaluation of cultural resources. Impacts to cultural resources that would result from the proposed project are identified, along with any measures to mitigate significant effects of the proposed project if needed.

4.2.2 Methodology

4.2.2.1 Historical Resources

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 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 and 2016. 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 B-1).

4.2.2.2 Archaeological and Paleontological Resources

Record searches performed for previous and current projects associated with LAX were reviewed to determine if previously recorded archaeological sites and paleontological occurrences have been found within LAX or in the surrounding vicinity that require evaluation and treatment.^{57,58} The results provide a basis for assessing the sensitivity of the cultural resources study area for additional and buried archaeological and paleontological resources, as well as human remains.

⁵⁷ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

⁵⁸ City of Los Angeles, Los Angeles World Airports, *Draft 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. Available:http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

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In addition, a Sacred Lands File (SLF) records search for the project site was commissioned through the California Native American Heritage Commission (NAHC) to determine whether any Native American cultural resources in the NAHC database were located within the project site or within a half-mile radius. The results of the SLF records search for the project site are included in Section 4.3, *Tribal Cultural Resources*, of this EIR.

4.2.3 Existing Conditions

4.2.3.1 Regulatory Context

Cultural resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification and, in certain instances, protection of cultural 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 cultural resources of national, state, regional, and local significance.⁵⁹

Cultural resources regulations address historical, archaeological, paleontological resources, and human remains.

4.2.3.1.1 Federal

National Register

The National Register of Historic Places (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."⁶⁰ 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.⁶¹

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."⁶²

⁵⁹ 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>.

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

⁶¹ 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.

⁶² 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>.

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.⁶³

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.⁶⁴

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 [CFR] Part 800). Federal agencies typically address compliance with the requirements of Section 106 concurrent with the National Environmental Policy Act (NEPA) environmental review process for proposed projects. For undertakings at U.S. airports, including LAX, the FAA is responsible for fulfilling the requirements of Section 106. The responsible FAA official is also the agency official (see 36 CFR Section 800.2(a)) for Section 106 coordination.⁶⁵

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 Section 800.16(y)). Historic properties are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register (36 CFR Section 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 effect (APE). The agency reviews background information, consults with the State Historic Preservation Officer (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 the 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 (see description below), 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

⁶³ 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>.

⁶⁴ "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>.

⁶⁵ U.S. Department of Transportation, Federal Aviation Administration, *1050.1F Desk Reference*, July 2015.

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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 will 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.

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.
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.⁶⁶

⁶⁶ 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.

Department of Transportation Act, Section 4(f)

Section 4(f) of the Department of Transportation (DOT) Act, which is codified and renumbered as Section 303(c) of 49 United States Code, provides that the Secretary of Transportation will not approve any program or project that requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance or land from an historic site of national, State, or local significance as determined by the officials having jurisdiction thereof, unless there is no feasible and prudent alternative to the use of such land and such program, and the project includes all possible planning to minimize harm resulting from the use.⁶⁷

For Section 4(f) purposes, the term “use” not only includes actual physical takings of Section 4(f) lands but also adverse indirect impacts, or constructive use. Constructive use only occurs if Section 4(f) lands are substantially impaired by a proposed action or its alternatives, which includes substantially diminishing the activities, features, or attributes of the Section 4(f) resource that contribute to its significance or enjoyment.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and Tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

4.2.3.1.2 State

Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also carries out the duties as set forth in the Public Resources Code and maintains the California Historical Resources Information System (CHRIS) and the California Register. The SHPO is an appointed official who implements historic preservation programs within the state's jurisdiction. CEQA requires project CEQA documents to identify, analyze, and provide feasible mitigation for substantial adverse impacts that may affect the significance of identified historical resources.

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.”⁶⁸ The criteria for eligibility for the California Register are based on National Register criteria.⁶⁹ 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.⁷⁰ Per OHP's Instructions for Recording Historical Resources, 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.⁷¹

⁶⁷ U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, *Order 1050.1F, Desk Reference*, July 2015. Available: http://www.faa.gov/about/office_org/headquarters_offices/apl/enviro_policy_guidance/policy/faa_nepa_order/desk_ref/media/desk-ref.pdf.

⁶⁸ California Public Resources Code, Section 5024.1(a).

⁶⁹ California Public Resources Code, Section 5024.1(b).

⁷⁰ California Public Resources Code, Section 5024.1(d).

⁷¹ California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995.

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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.⁷²

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; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as a historic preservation overlay zone.⁷³

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.⁷⁴ 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.⁷⁵

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."⁷⁶ 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:⁷⁷

- A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the California Register.

⁷² California Public Resources Code, Section 5024.1(d).

⁷³ California Public Resources Code, Section 5024.1(e).

⁷⁴ 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*.

⁷⁵ 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*.

⁷⁶ California Public Resources Code, Section 21084.1.

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

- 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.

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).

California Health and Safety Code 7050.5

California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

Public Resources Code Section 5097.98

Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the NAHC. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

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 paleontological, archaeological, and historical sites. Chapter II, Section 3 of the City of Los Angeles General Plan Conservation Element (adopted 2001) contains the following objectives and policies applicable to the proposed project:

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- Objective: Protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes.
- Policy: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

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. While 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 Plan⁷⁸

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;

⁷⁸ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, September 2016.

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
- World War II Munitions Bunker
- Terminal 6 Sign Tower

None of the above seven historical resources are located 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 three individually eligible resources (two of which are the CAL GO Building and the CAL Training Center Building, discussed in Section 4.2.3.2.1 below), two small historic districts (one of which is the Continental Airlines Complex, discussed in Section 4.2.3.2.1 below), and one 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 documentation plan to fully document the historic resource prior to alternation or demolition. OHR shall review and submit any written comments within 15 working days from the date the documents were received.

LAX Archaeological Treatment Plan

Los Angeles World Airports (LAWA) prepared an Archaeological Treatment Plan (ATP) to ensure the long-term protection and proper treatment of archaeological discoveries of federal, state, and/or local significance that may be encountered during LAX Master Plan implementation.^{79,80} LAWA also requires compliance with the ATP for all non-LAX Master Plan development projects at LAX that involve grading and/or excavation in native and undisturbed soils. The ATP establishes requirements for monitoring during grading and/or excavation in native and undisturbed soils by a qualified archaeologist and protocols for the identification, evaluation, and recovery of archaeological resources, consistent with federal and state requirements, if such resources are discovered.

⁷⁹ 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: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf.

⁸⁰ The ATP was prepared in accordance with the LAX Master Plan Mitigation Monitoring and Reporting Program but is applicable to all projects at the airport with the potential to affect archaeological resources.

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LAX Paleontological Management Treatment Plan

LAWA prepared a Paleontological Management Treatment Plan (PMTP) to ensure the proper treatment of paleontological resources that may be encountered during LAX Master Plan implementation.^{81,82} The PMTP focuses on the identification, recovery, proper treatment, and long-term protection and archival conservation of expected and unexpected paleontological discoveries of federal, state, and/or local significance that may be encountered during LAX Master Plan implementation. LAWA also requires compliance with the PMTP for all non-LAX Master Plan development projects at LAX that involve excavation in native and undisturbed soils. In the event that paleontological deposits are encountered, the PMTP is used as a guideline for the evaluation, treatment and archival conservation of such resources consistent with federal and state requirements.

4.2.3.2 Baseline Conditions

4.2.3.2.1 Historical Resources

Setting

Early Land Use and Airport Development

As outlined in the historic resources assessment (see Appendix B-1), the land currently occupied by LAX, prior to its development as an airport, 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. In 1894, 2,000 acres of the original Rancho Sausal Redondo ranch was leased to local farmer Andrew B. Bennet, which became known as the Bennett Rancho. The City of Los Angeles leased 640 acres of the Bennett Rancho in 1928 to operate Mines Field. 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 federal government took control of the airport in January of 1942 and it was turned over for military use for the duration of the war.

During the war, the DOA was able to secure 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. Voters approved a bond measure to fund the improvements in 1945 and temporary facilities for the airlines -- referred to as the "Intermediate Facilities" -- were soon constructed. By 1947, six major airlines were operating at the airport. In 1949, the airport was officially named "Los Angeles International Airport" after the Civil Aeronautics Administration determined the airport suitable for international, intercontinental, and non-stop domestic flights.

In 1956, a new master plan for a "Jet Age" airport was developed by an architectural joint venture of architecture firms Welton Beckett and Associates and Pereira and Luckman, with Pereira and Luckman joined by Paul R. Williams.

⁸¹ City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, revised December 2005. Available: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Paleontological_Management_Treatment_Plan.pdf.

⁸² The PMTP was prepared in accordance with the LAX Master Plan Mitigation Monitoring and Reporting Program but is applicable to all projects at the airport with the potential to affect paleontological resources.

Their 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, an eye-catching Theme Building restaurant in the center of the site, and support facilities, including a cooling tower, utility plant, and service building, located west of the Theme Building. Inspired by the aesthetics of the Jet Age, the Theme Building quickly became an internationally recognized symbol and centerpiece of the new airport, distinguished by its parabolic arches from which a flying-saucer-shaped restaurant was suspended.

Implementation of the master plan began in 1957 with the construction of field improvements and runway extensions. This was quickly followed by the necessary excavations for the underground components. The final phase included the construction of the terminal buildings and the ATCT, which was completed in 1961. On January 13, 1962, the Theme Building opened to the public.

Continental Airlines Corporate History

In 1934, Varney Speed Lines, a mail and passenger air transport service based in the Southwest, established a route out of El Paso, Texas through New Mexico and Colorado. The airline was renamed "Continental Air Lines" (later changed to "Continental Airlines") in 1936 and, in 1937, its headquarters was relocated to Denver. During World War II, Continental provided transport of military personnel and equipment and Continental's repair and maintenance facilities in Denver were used to convert airplanes for the Army Air Force. Profits from the war effort funded the purchase of additional aircraft and added routes in Missouri, Kansas, Oklahoma, Texas, and New Mexico. By 1945, Continental provided service to 26 cities and employed nearly 400 people.

In 1953, Continental acquired Pioneer Airlines, which operated in Texas and New Mexico. The acquisition nearly doubled the total number of cities serviced by Continental. Two years later, the airline added service between Los Angeles and Chicago and placed orders for Boeing 707 aircraft, the first jet-powered aircraft for the company. Continental also pioneered the practice of repairing and maintaining their aircraft at night allowing them to keep their jets in continuous service. This maintenance schedule became known as "progressive maintenance" and was eventually adopted by every airline. Continental proved itself to be a formidable player in the airline industry and was reporting record profits by 1960.

In 1963, Continental relocated its headquarters from Denver to Los Angeles. The facility at LAX included corporate offices, system operations control, the central maintenance facility, a flight kitchen, training center, and Los Angeles crew bases. It was at this time that Continental became a truly "international" airline. From its west coast facility, Continental provided extensive cargo and troop transport throughout the Vietnam War and established service to Micronesia through its Air Micronesia subsidiary, which included service to Hawaii. Charters to European cities were also added.

In 1978, the Airline Deregulation Act introduced a free market in the American commercial airline industry by removing federal government control over fares, routes, and market entry of new airlines. Deregulation greatly increased the number of flights and reduced fares as the airline industry became more competitive.

After a contentious battle with Continental management, Continental was acquired by Texas International in 1982 and subsequently moved its headquarters to Houston after 19 years at LAX. In May 2010, United Airlines and Continental Airlines Inc., announced a \$3-billion merger that created the world's largest airline at the time. The combined airline was now competitive in all the major American domestic markets, and serviced hundreds of destinations in Asia, Europe, and South America. The "Continental" name was dropped in favor of the United brand name when the final switchover happened on March 2, 2012.

4.2 Cultural Resources

Project Site and Surrounding Area Development – 1963-1980

As noted above, Continental Airlines relocated their corporate headquarters from Denver to LAX in 1963. The Continental headquarters was located west of the main LAX Central Terminal Area, on the south side of World Way West in the west-central portion of the airport property. Prior to Continental Airlines' relocation, a food service preparation building or "Flight Kitchen," a service building including two service hangar bays, and the associated concrete and asphalt apron, were developed between 1956 and 1962.

In 1963, the Continental Airlines General Office (CAL GO) Building was constructed north of the Flight Kitchen and service building, facing World Way West. The CAL GO Building was designed by Los Angeles architect Edward Augustus Grenzbach in a Mid-century Modern style with a rectangular plan and a flat roof. Construction included an attached one-story cafeteria building at the southeast corner of the CAL GO Building; an open-air, concrete patio directly south of the CAL GO Building; and an enclosed second-floor pedestrian bridge connecting the CAL GO Building to the service complex.

A training center building for Continental Airlines was constructed in 1966 west of the CAL GO Building facing World Way West. The two-story Training Center Building was also designed by Edward Augustus Grenzbach in a Mid-century Modern style with a rectilinear plan and a flat roof.

Improvements developed by Continental Airlines between 1963 and 1972 included the addition of Hangar Bay No. 3 (1965), shops and offices (1965), additions to the existing maintenance/engineering offices (1966), Hangar Bay No. 4 (1967), flight kitchen addition (1968), and Hangar Bays No. 5 and 6 (1971-1972). A variety of tenant improvements, repairs, and alterations have been completed since that time.

An aerial photograph showing the Continental Airlines facilities at LAX circa April 1976 is provided in **Figure 4.2-1**.

Eligible Historical Resources

Eligible historical resources located on, and in the vicinity of, the project site are identified in **Table 4.2-1** and shown on **Figure 4.2-2**. Each of these resources is further described below.



CAL GO Building

World Way West

CAL Hangars,
Shops, and
Storage Facilities

CAL Training
Center

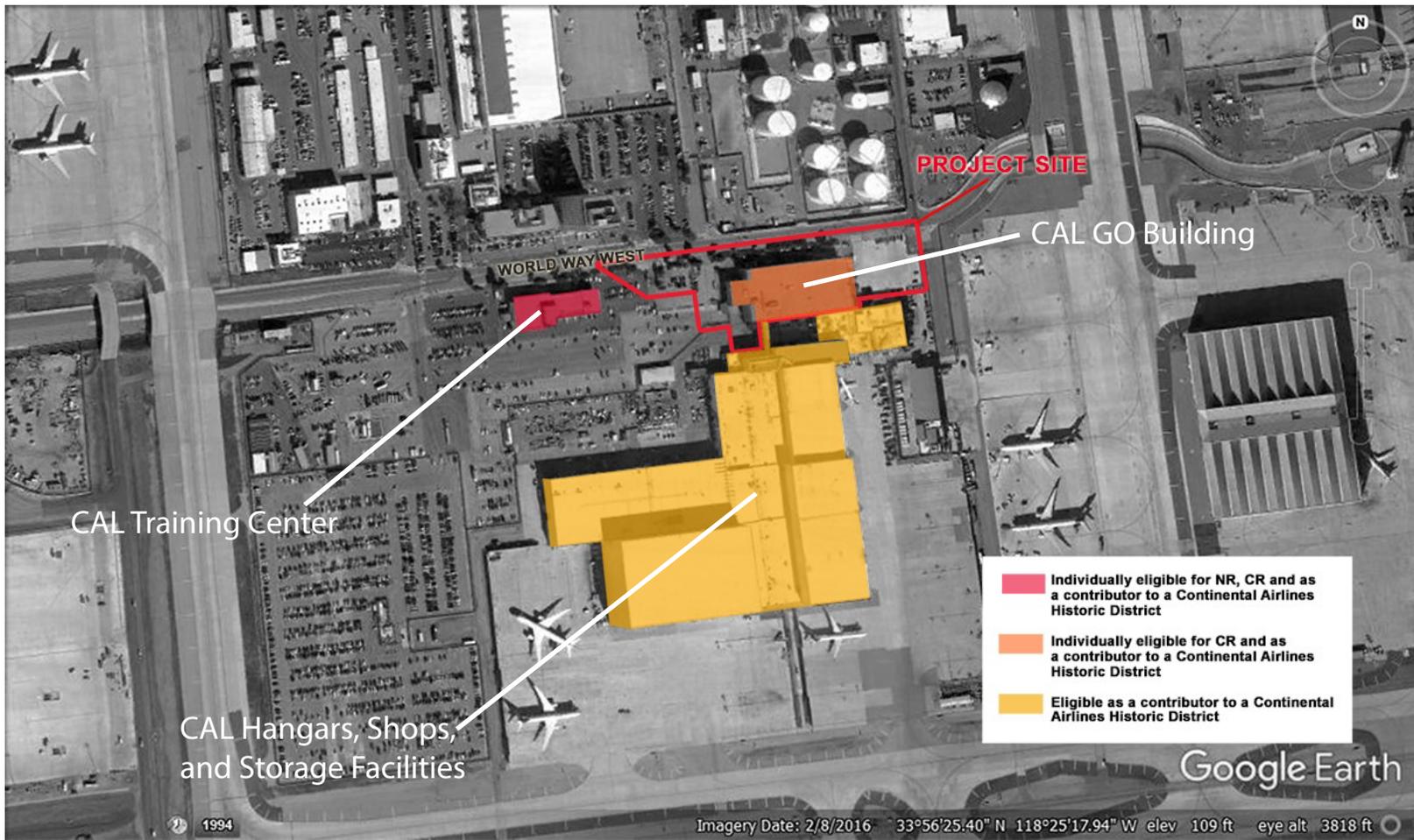


Source: Flight Path Museum Archives.
Prepared by: CDM Smith, May 2017.

LAX Secured Area Access Post Project

**Aerial Photograph of
Continental Airlines Facilities (1976)**

Figure
4.2-1



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

LAX Secured Area Access Post Project

Historic Resources in the Project Vicinity

Figure
4.2-2

Property	Location	Year Built	NR	CR	LAHCM
Continental Airlines General Office Building ¹ - 7270 World Way West	On Project Site	1963	Ineligible	Eligible	Eligible
Continental Airlines Training Center Building ¹ - 7320 World Way West	West of Project Site	1966	Eligible	Eligible	Eligible
Continental Airlines Hangars, Shops, and Storage Facilities ² - 7260, 7280, and 7300 World Way West	South of Project Site	1963-1972	Ineligible	Ineligible	Ineligible
Continental Airlines Complex – All buildings identified above (7270, 7320, 7260, 7280, and 7300 World Way West)	Buildings on, West, and South of Project Site	1963-1972	Ineligible	Eligible	Eligible
Source: Appendix B-1 of this EIR.					
Notes:					
1. Also a contributor to a potential historic district, the Continental Airlines Complex, eligible for the California Register and as a Los Angeles Historic-Cultural Monument.					
2. Although the Continental Airlines Hangars, Shops, and Storage Facilities are not historically significant individually, together they are considered a contributor to a potential historic district, the Continental Airlines Complex, eligible for the California Register and as a Los Angeles Historic-Cultural Monument.					
Key:					
NR = National Register of Historic Places.					
CR = California Register of Historical Resources.					
LAHCM = Los Angeles Historic-Cultural Monument.					

Historical Resources Located on the Project Site

Continental Airlines General Office Building - 7270 World Way West (1963)

The project site contains one building, the former CAL GO Building, located at 7270 World Way West (see **Figure 4.2-3**). As noted in the previous section, the CAL GO Building was designed by Los Angeles architect Edward Augustus Grenzbach and was constructed in 1963. It is Mid-century Modern in style with a rectangular plan and a flat roof. It is two stories in height over a semi-subterranean parking garage. The primary (north) façade is a symmetrical composition of eleven bays of two-story, metal-framed glazed curtain walls between projecting concrete piers that continue above the roof line. Similarly, the curtain wall mullions extend above the roof line and below the elevated first floor line. The open semi-subterranean garage is screened with chain link fencing.

There is a double floating staircase with concrete treads and a metal balustrade centered on the north façade. The staircase originally accessed the building's primary entry although the original entry doors have been removed and the openings glazed. The former entry landing is surmounted by a metal canopy sculpture suspended over the landing. Entitled "Free Form of Future Flight," the canopy sculpture was made by artist Russell Holmes and installed July 1963, according to a plaque affixed to the wall nearby.

The secondary (east and west) façades are finished primarily in full-height panels of yellow glazed ceramic tile; the panels are separated by metal channels. There is an entrance recessed on the east façade. The entrance consists of a pair of fully-glazed metal doors in a full-height, metal-framed glazed curtain wall with a decorative metal *brise-soleil*. Metal-framed, sliding glass doors open to a projecting second-story covered balcony at the southeast corner of the building. The balcony has a cement plaster parapet and cantilevered soffit, and a metal guardrail. There is a large, rectangular addition on the west façade. The south façade is finished primarily in cement plaster with metal expansion joints. There is a cafeteria and kitchen building attached to the southeast corner of the CAL GO Building.



Continental Airlines General Office Building (2016)
Looking southeast to north and west facades



Continental Airlines General Office Building (2016)
North (primary) facade details

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

LAX Secured Area Access Post Project

Continental Airlines GO Building Photographs

Figure
4.2-3

The interior of the CAL GO Building has been extensively altered through numerous tenant improvement projects. The interior spaces are composed primarily of gypsum board partitions and suspended acoustical tile ceilings. They are mostly undistinguished and are in poor condition.

The CAL GO Building is significant under National Register Criterion A and California Register Criterion 1 as an aviation property associated with the rapid development of commercial aviation in the years after World War II, which had prompted advances in aircraft design and technology. It is also significant under National Register Criterion C and California Register Criterion 3 as an aviation property that embodies the distinctive characteristics of Mid-century Modern architecture, which reflects the period during which LAX was developed. The building was designed and built for Continental Airlines and served as the company's national headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex from 1963 through 1982 reflected the commercial success of Continental Airlines, and the building's Mid-century Modern style, incorporating the company's black, white, and gold corporate colors, established Continental's corporate identity on the West Coast. Due to alterations, the CAL GO Building does not appear to retain sufficient integrity for listing in the National Register; however, it retains sufficient integrity to convey its historical significance and therefore retains its eligibility for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument.

The CAL GO Building is also a contributor to a California Register-eligible historic district that includes the attached associated complex of hangars, shops, and storage facilities (7260, 7280, and 7300 World Way West) and the nearby Training Facility at 7320 World Way West (discussed below).

Historical Resources Located in the Near Vicinity of the Project Site

Continental Airlines Training Center Building - 7320 World Way West (1966)

The Continental Airlines Training Center Building, shown in **Figure 4.2-4**, is located west of the project site and CAL GO Building at 7320 World Way West. It was designed by Los Angeles architect Edward Augustus Grenzbach and was constructed in 1966. The building is Mid-century Modern in style with a rectilinear plan and a flat roof. There is a central penthouse at the rear (south) portion of the roof. The building is two stories in height and is composed of two volumes, a square volume to the west and a rectangular volume to the east. It sits on a concrete podium with a wide plaza accessed by concrete steps at the northwest corner. The steps are anchored on the west by a raised planter and on the east by a stone-veneered monument sign. The building's primary (north) façade is asymmetrically composed of three sections. The west portion consists of a metal colonnade with a recessed metal-framed glazed curtain wall behind. The colonnade has a cement plaster ceiling with large, round, recessed light fixtures and terminates in a solid projecting wall veneered in yellow glazed ceramic tile. The central portion of the north façade consists of a two-story metal-framed glazed curtain wall. The east portion is an unarticulated wall of painted concrete masonry units. The east, south, and west façades are of painted concrete masonry units.

The former flight simulator space is a large, two-story interior volume at the northwest corner of the building with one wall finished in yellow glazed ceramic tile continued from the exterior, large recessed circular light fixtures, and interior metal-framed glazed openings at the second-floor level. A second two-story interior volume contains a portion of fuselage used for flight crew training.

The Training Center Building is individually significant under National Register Criterion A, California Register Criterion 1, and local Historic-Cultural Monument criteria, as an aviation site associated with the rapid development of commercial aviation in the years after World War II. It is also significant under National Register Criterion C, California Register Criterion 3, and local Historic-Cultural Monument criteria as an aviation property that embodies the distinctive characteristics of Mid-century Modern architecture, which reflects the period during which LAX was developed. The building was designed and built for Continental Airlines and served as the company's national training headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex reflected the commercial success of Continental Airlines, and the Training Center Building's Modern style, incorporating the company's black, white, and gold corporate colors, established Continental's corporate identity on the West Coast. The building is an airline-specific property type and



Continental Airlines Training Center (2013)
Looking east to primary north facade



Continental Airlines Training Center (2013)
Looking north to south facade

Source: PCR Services Corporation, September 2013.
Prepared by: CDM Smith, May 2017.

LAX Secured Area Access Post Project

**Continental Airlines
Training Center Building Photographs**

Figure
4.2-4

two of its interior spaces, the flight simulator and the crew training space with its partial fuselage, represent rare and unique uses. It retains a high degree of integrity and therefore is eligible for listing in the National Register, the California Register, and as a City of Los Angeles Historic-Cultural Monument.

The Training Center Building is also a contributor to a California Register-eligible historic district that includes the nearby CAL GO Building at 7270 World Way West and the attached associated complex of hangars, shops, and storage facilities at 7260, 7280, and 7300 World Way West. (See below)

Continental Airlines Hangars, Shops, and Storage Facilities – 7260, 7280, and 7300 World Way West (1963-1972)

The Continental Airlines complex of hangars, shops, and storage facilities is located immediately south of, and attached to, the company's GO Building. The complex includes a pre-existing Flight Kitchen, Hangar Bays 1 and 2, and associated concrete and asphalt apron, developed between 1956 and 1962 before Continental's occupancy; and improvements developed by Continental Airlines between 1963 and 1972 including Hangar Bay No. 3 (1965), shops and offices (1965), additions to existing maintenance/engineering offices (1966), Hangar Bay No. 4 (1967), flight kitchen addition (1968), and Hangar Bays No. 5 and 6 (1971-1972). A variety of tenant improvements, repairs, and alterations have been completed since that time. The buildings are utilitarian structures with rectangular plans and flat roofs (see **Figure 4.2-5**).

The hangars, shops, and storage facilities are not historic individually; however, the facilities together are a contributor to a California Register-eligible historic district that includes the attached CAL GO Building (7270 World Way West) and the nearby Training Facility at 7320 World Way West. (See below)

Continental Airlines Complex

The CAL GO Building (7270 World Way West), the Training Center Building (7320 World Way West), and the hangars, shops, and storage facilities (7260, 7280, and 7300 World Way West) together form a historic district that is significant under National Register Criterion A, California Register Criterion 1, and local Historic-Cultural Monument criteria, as an aviation property associated with the rapid development of commercial aviation in the years after World War II, which had prompted advances in aircraft design and technology. The complex was designed and built for Continental Airlines and served as the company's national headquarters during the time it played a formative role in the development and growth of LAX and the airline industry. The development of the complex from 1963 through 1972 reflected the commercial success of Continental Airlines during those years. Due to alterations after Continental's occupancy, including an addition to the CAL GO Building and alteration of the Flight Kitchen, the complex no longer retains sufficient integrity for listing in the National Register. In addition, the period of significance (1965-1982, reflecting Continental's occupancy) extends within the last 50 years. However, the Continental Airlines Complex historic district retains sufficient integrity to convey its historic significance, and the California Register is generally less exacting regarding integrity. Therefore, the Continental Airlines Complex is eligible for designation at the state and local levels.

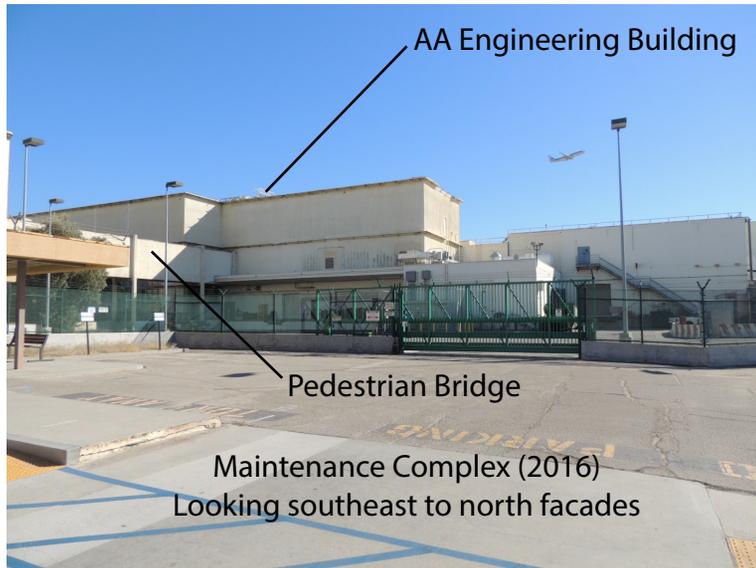
4.2.3.2.2 Archaeological and Paleontological Resources

Setting

Paleoindian Period (ca. 13,000-11,000 Years Before Present [YBP])

Little is known of Paleoindian peoples in southern California, and the cultural history of this period follows that of North America in general. The earliest radiocarbon dates from the Paleoindian Period in North America come from the Arlington Springs Woman site on Santa Rosa Island. These human remains date to approximately 13,000 YBP.⁸³ Lifeways during the Paleoindian Period were characterized by highly mobile hunting and gathering. Prey included

⁸³ Johnson, John R., Thomas W. Stafford, Jr., Henry O. Ajie, and Don P. Morris, *Arlington Springs Revisited, Proceedings of the Fifth California Islands Symposium*, edited by David R. Brown, Kathryn C. Mitchell and Henry W. Chaney, pp. 541-545, Santa Barbara Museum of Natural History, Santa Barbara, 2002.



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

LAX Secured Area Access Post Project

**Continental Airlines Hangars,
Shop, and Storage Facilities Photographs**

Figure
4.2-5

megafauna such as mammoth and technology included a distinctive flaked stone toolkit that has been identified across much of North America and into Central America. They likely used some plant foods, but the Paleoindian toolkit recovered archaeologically does not include many tools that can be identified as designed specifically for plant processing.⁸⁴

Archaic Period (ca. 11,000-3,500 YBP)

The earliest Archaic Period lifeways in inland southern California have been given the name San Dieguito tradition, after the San Diego area where it was first identified and studied.⁸⁵ Characteristic artifacts include stemmed projectile points, crescents, and leaf-shaped knives, which suggest a continued subsistence focus on large game, although not megafauna of the earlier Paleoindian period. Milling equipment appears in the archaeological record at approximately 7,500 years ago.⁸⁶ Artifact assemblages with this equipment include basin millstones and unshaped manos, or grinding slabs used to process small, hard seeds from plants, projectile points, flexed burials under cairns, and cogged stones, and have been given the name La Jolla Complex (7,500–3,000 YBP). The transition from San Dieguito lifeways to La Jolla lifeways appears to have been an adaptation to drying of the climate after 8,000 YBP, which may have stimulated movements of desert peoples to the coastal regions, bringing millstone technology with them. Groups in the coastal regions focused on mollusks, while inland groups relied on wild-seed gathering and acorn collecting.

Late Prehistoric Period (ca. 3,500 YBP-A.D. 1769)

Cultural responses to environmental changes around 4,000–3,000 YBP included a shift to more land-based gathering practices. This period was characterized by the increasing importance of acorn processing, which supplemented the resources from hunting and gathering. The period after A.D. 1400 was identified as the San Luis Rey complex.⁸⁷ San Luis Rey I (A.D. 1400–1750) is associated with bedrock mortars and millstones, cremations, small triangular projectile points with concave bases, and Olivella beads. The San Luis Rey II (A.D. 1750–1850) period is marked by the addition of pottery, red and black pictographs, cremation urns, steatite arrow straighteners, and non-aboriginal materials.^{88,89} Work at Cole Canyon and other sites in southern California suggest that this complex, and the ethnographically described lifeways of the native people of the region, were well established by at least 1,000 YBP.⁹⁰

Ethnographic Setting - The Gabrielino

At the time of contact, the Native Americans subsequently known as the Gabrielino occupied lands around LAX; their territories comprised nearly the entire basin comprising the counties of Los Angeles and Orange. They belonged to the Takic family of the Uto-Aztecan linguistic stock. Named after the Mission San Gabriel, the Gabrielino are considered to have been one of the two wealthiest and largest ethnic groups in aboriginal southern California, the other being the Chumash in the Santa Barbara Channel region.⁹¹

⁸⁴ City of Los Angeles, Los Angeles World Airports, *Draft 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. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

⁸⁵ Warren, Claude N, "Cultural Tradition and Ecological Adaptation on the Southern California Coast", in *Archaic Prehistory in the Western United States*, C. Irwin-Williams, ed, pp. 1-4, *Eastern New Mexico University Contributions in Anthropology*, Portales, 1968.

⁸⁶ Moratto, Michael J., *California Archaeology*, Academic Press, San Diego, p. 158, 1984.

⁸⁷ Meighan, C.W, "A Late Complex in Southern California Prehistory," *Southwestern Journal of Anthropology* 10:215–227, 1954.

⁸⁸ Meighan, C.W, "A Late Complex in Southern California Prehistory," *Southwestern Journal of Anthropology* 10:223, 1954.

⁸⁹ Keller, Jean K. and Daniel F. McCarthy, "Data Recovery at the Cole Canyon Site (CA-RIV-1139), Riverside County, California," *Pacific Coast Archaeological Society Quarterly*, 25(1):6, 1989.

⁹⁰ Keller, Jean K. and Daniel F. McCarthy, "Data Recovery at the Cole Canyon Site (CA-RIV-1139), Riverside County, California," *Pacific Coast Archaeological Society Quarterly*, 25(1):80, 1989.

⁹¹ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC:

4.2 Cultural Resources

The Takic-speaking ancestors of the Gabrielino arrived in the Los Angeles basin around 1500 BC and spread throughout the area, displacing a preexisting Hokan-speaking population.⁹² The first Spanish contact with the Gabrielino took place in 1520, when Juan Rodriguez Cabrillo arrived on Santa Catalina Island. In 1602, the Spanish returned to Santa Catalina under Sebastián Vizcaíno, and in 1769, Gaspar de Portolá made the first attempt to colonize Gabrielino territory. By 1771, the Spanish had built four missions, and the decimation of the Gabrielino had already begun.⁹³ European diseases and conflicts among the Gabrielino population, as well as conversion to Christianity, carried a toll in their numbers, traditions, and beliefs.

Although determining an accurate account of the population numbers is difficult, Bean and Smith state that, by AD 500, the Gabrielino established permanent settlements and their population continued to grow.⁹⁴ Early Spanish accounts indicate that the Gabrielino lived in permanent villages with populations ranging from 50 to 200 individuals. The Gabrielino population surpassed 5,000 people by around 1770.

The Gabrielino practiced different subsistence strategies that included hunting, fishing, and gathering. Hunting activities on land were carried out with the use of bow and arrow, deadfalls, snares, and traps. Smoke and throwing clubs also were used to assist with the hunt of burrowing animals. Aquatic animals were hunted with harpoons, spear-throwers, and clubs. Although most fishing activities took place along rivers and from shore, open water fishing trips between mainland and the islands also took place using boats made from wood planks and asphaltum. The Gabrielino fishing equipment included fishhooks made of shells, nets, basketry traps, and poison substances obtained from plants.⁹⁵

The Gabrielinos were involved in trade among themselves and with other groups. Coastal Gabrielinos exchanged steatite, shell and shell beads, dried fish, sea otter pelts, and salt with inland groups for acorns, seeds, obsidian, and deerskins.⁹⁶ During the late prehistoric period, the principal trade item, both among the Gabrielino and for export to other groups, was steatite. Also known as soapstone or soaprock, major outcroppings of steatite are found on Santa Catalina Island. Steatite was widely used among the Gabrielino to make arrow straighteners and artistic or ritualistic objects. In addition, this rock was used in the making of functional objects for food preparation such as bowls, mortars, pestles, and comals, or griddle.⁹⁷ Archaeological data indicate that a steatite “industry” developed prehistorically on the island that involved the large-scale trade of both raw materials and finished artifacts to mainland communities.⁹⁸

Previously Recorded Archaeological Resources

The LAX Master Plan Final EIR identified 36 previously recorded archaeological sites within a radius of approximately two miles of LAX, including eight sites located on LAX property.⁹⁹ None of the eight sites identified on LAX property is located within the boundaries of the project site or in the immediate vicinity.

Smithsonian Institution, p. 538, 1978.

⁹² Sutton, Mark Q., "People and Language: Defining the Takic Expansion into Southern California," *Pacific Coast Archaeological Society Quarterly*, 41(2&3): 31-93, 2009.

⁹³ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, pp. 540-541, 1978.

⁹⁴ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 540, 1978.

⁹⁵ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 546, 1978.

⁹⁶ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

⁹⁷ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

⁹⁸ Bean, L.J., and C.R. Smith, "Gabrielino," *Handbook of North American Indians*, Vol. 8, ed., R.F. Heizer, Washington, DC: Smithsonian Institution, p. 547, 1978.

⁹⁹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

Results of the records search conducted for the LAX Landside Access Modernization Program from the South Central Coastal Information Center (SCCIC) indicated no archaeological resources have been recorded at or within a half-mile radius of the proposed SAAP project site.¹⁰⁰ The project site is a highly disturbed area that has long been, and is currently being, used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

The results of the SLF records search for the project site through the NAHC are included in Section 4.3, *Tribal Cultural Resources*, of this EIR. As discussed therein, the SLF records search by the NAHC did not indicate the presence of Native American cultural resources from the NAHC archives within the project area or surrounding vicinity.

Previously Recorded Paleontological Resources

The LAX property lies in the northwestern portion of the Los Angeles Basin, a broad structural syncline with a basement of older igneous and metamorphic rocks overlain by thick younger marine and terrestrial deposits. The older deposits that underlie the LAX area are assigned to the Palos Verdes Sand formation. The Palos Verdes Sand formation is one of the better-known Pleistocene age deposits in southern California. The unit was deposited in a shallow sea that covered the region some 124,000 years ago. These deposits have a high potential for yielding unique paleontological deposits. The Palos Verdes Sand formation covers half of the LAX area, beginning at Sepulveda Boulevard and extending easterly beyond the airport.¹⁰¹

The records search conducted for the LAX Landside Access Modernization Program from the Vertebrate Paleontology Department at the Natural History Museum of Los Angeles County (NHMLAC) indicated that there were no known paleontological localities within the vicinity of the proposed project.

4.2.4 Thresholds of Significance

A significant impact on cultural 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.
- A substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5.
- Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.
- Disturbance of any human remains, including those interred outside of formal or dedicated cemeteries.

These thresholds are 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:¹⁰²

¹⁰⁰ The study area for the archaeological and paleontological resources assessment for the LAX Landside Access Modernization Program included areas within the CTA, some of which are adjacent to the project site; refer to Figure 2 in City of Los Angeles, Los Angeles World Airports, *Draft 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. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

¹⁰¹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.9.2 – Paleontological Resources, April 2004.

¹⁰² City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

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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

4.2.5.1 Historical Resources

The proposed project would involve demolition of the CAL GO Building, which has been found to be individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Demolition of the CAL GO Building would result in a significant impact to an historical resource at the state and local levels. LAVA has prepared archival photographic documentation of the CAL GO Building in accordance with Historic American Buildings Survey (HABS) standards to document the building and its historic character-defining features (the Historic Building Documentation for the CAL GO Building, which includes archival-quality photographs and accompanying report, is included as Appendix B-2 of this Draft EIR). A complete set of the documentation, including original archival photographs, was provided to both the Flight Path Learning Center and Museum, and the South Central Coastal Information Center at California State University, Fullerton.

The CAL GO Building is also a contributor to a potential Continental Airlines Complex historic district, which was found to be eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Constructed as the headquarters office building for Continental Airlines, the CAL GO Building housed the administrative center for Continental Airlines' global operation and served as the public face for Continental's complex of buildings at LAX. The attached flight kitchen, hangars, shops and storage facilities, and the nearby Training Center Building, housed functions ancillary to the CAL GO Building and it was through the CAL GO Building that the district's association with Continental Airlines was largely established. Demolition of the CAL GO Building would result in the loss of a primary contributing building to the potential historic district, substantially reducing the integrity of the district. Without the CAL GO Building, much of the potential district's association with Continental Airlines would be lost and the district would no longer be eligible for listing in the California Register or as a City of Los Angeles Historic-Cultural Monument. For these reasons, demolition of the CAL GO Building would also result in a significant impact to the potential Continental Airlines Complex historic district.

New construction associated with the proposed project would be located approximately 55 feet from the CAL Training Center Building at the closest point, and approximately 65 feet from the north edge of the Continental Airlines flight kitchen, hangars, shops, and storage facilities that would remain after demolition of the CAL GO Building. The proposed new construction would consist primarily of paved roadway, canopy structures, two guard houses, gates, and fencing. Section XII. Noise of the Initial Study prepared for the proposed SAAP project evaluated whether vibration from project construction-related activities (including demolition and new construction) would have an impact on nearby historical resources, including the Training Center Building and remaining Continental Airlines hangars, shops, and storage facilities (refer to Appendix A of this Draft EIR). The analysis in the Initial Study found that, due to the distance between construction activities and these structures, construction-related vibration would be well below the threshold of significance established by the California Department of Transportation and vibration-related impacts would be less than significant. Because of its distance from the Training Center Building and remaining former Continental Airlines facilities, new construction associated with the project would not result in physical demolition, destruction, relocation, or alteration such that their significance would be materially impaired. All the physical characteristics that convey historic significance and justify eligibility for historic listing

would remain intact and unchanged. Therefore, new construction associated with the project would not result in significant impacts to the Training Center Building or to the remaining former Continental Airlines facilities.

4.2.5.2 Archaeological Resources

The cultural resource records search indicated that no previously recorded archaeological resources (including historic or prehistoric archaeological resources) have been recorded at or within a half-mile radius of the project site.¹⁰³ The project area (including the project site and construction staging area) is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities. Thus, surficial archaeological resources that may have existed at one time have likely been displaced by these disturbances. While discovery of archaeological resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown buried archaeological resources that fall within the definition of historical resources or unique archaeological resources. Thus, impacts to archaeological resources could be significant.

4.2.5.3 Paleontological Resources

The paleontological resources records search indicated that no previously recorded vertebrate fossil localities from the NHMLAC database are located within the project area (including the project site and construction staging area).¹⁰⁴ As mentioned previously, the project area is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities that have likely displaced surficial paleontological resources. While discovery of paleontological resources in artificial fill deposits within the project area is unlikely, proposed excavations at the project site could impact intact, unique paleontological resources that have not been disturbed or displaced by previous development. Since the proposed project would include excavations of varying depths across portions of the project site, the proposed project could impact previously unknown buried unique paleontological resources. Thus, impacts to paleontological resources could be significant.

4.2.5.4 Human Remains

As discussed in Section 4.3, *Tribal Cultural Resources*, of this EIR, an SLF search from the NAHC did not find any records pertaining to the presence of Native American cultural resources from the NAHC archives within the project area or surrounding vicinity (although the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources). As stated above, the project area (including the project site and construction staging areas) 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 area is unlikely, proposed excavations could impact previously unknown buried human remains. However, LAWA would comply with 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. Therefore, through compliance with state and local regulations, impacts from disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant.

¹⁰³ City of Los Angeles, Los Angeles World Airports, *Draft 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. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

¹⁰⁴ City of Los Angeles, Los Angeles World Airports, *Draft 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. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

4.2.6 Cumulative Impacts

The cumulative impacts analysis evaluates the impacts of the project on cultural resources in conjunction with past, present, and reasonably foreseeable probable future projects, as listed in Table 3-1. The implementation of the project, when combined with these other projects, could result in cumulative impacts to cultural resources if the combined impacts would exceed the identified thresholds of significance.

4.2.6.1 Historical Resources

As noted in Section 4.2.5.1, the proposed project would result in a significant impact to an historical resource, the CAL GO Building, by resulting in the demolition of the building. In addition, demolition of the CAL GO Building would result in the loss of a primary contributing building to the potential Continental Airlines Complex historic district, substantially reducing the integrity of the district. This would be a significant impact to the potential Continental Airlines Complex historic district. The proposed project would not result in significant impacts to the Training Center Building or to the Continental Airlines Hangars, Shops, and Storage Facilities by themselves.

None of the cumulative projects listed in Table 3-1 is located in proximity to the historical resources located on or near the project site and identified in Table 4.2-1, namely the CAL GO Building; the Training Center Building; the Continental Airlines Hangars, Shops, and Storage Facilities; or the Continental Airlines Complex (see Figure 3-1). Therefore, no cumulative impacts to these historical resources would occur. However, other historical resources at the airport would be affected by cumulative projects at LAX. Specifically, three historical resources at LAX, other than the CAL GO Building, have the potential to be affected by cumulative projects at LAX, including the Theme Building, the 1961 ATCT, and the Intermediate Terminal Facility. The Theme Building is eligible for listing in the National Register, is listed in the California Register, and is a designated LAHCM. The 1961 ATCT does not appear to be eligible for the National Register or the California Register, but has been determined to be eligible for local listing as an LAHCM. The Intermediate Terminal Facility does not appear to be eligible for the National Register, but has been determined to be eligible for listing in the California Register and as an LAHCM.¹⁰⁵

The Theme Building and 1961 ATCT are both located in the LAX Central Terminal Area (CTA). A number of cumulative project listed in Table 3-1 are located in the CTA and would involve exterior improvements or new construction, including the LAX Bradley West Project, Terminal 1.5 Project, Terminals 2 and 3 Modernization Project, Concourse 0, and LAX Landside Access Modernization Program. None of the cumulative terminal improvement projects would result in a direct physical impact to the Theme Building or 1961 ATCT. The LAX Bradley West Project is not located in proximity to the 1961 ATCT and would not contribute to cumulative impacts to this resource. However, the LAX Bradley West Project is visible from, and within view of, the Theme Building. The Bradley West Project is compatible with the historic materials, features, size, scale and proportion, and massing of the Theme Building and would not contribute to cumulative impacts to this historical resource.¹⁰⁶

The LAX Landside Access Modernization Program would result in a significant impact to the Theme Building as a result of the construction of the Automated People Mover (APM) guideway and pedestrian walkway. The LAX Landside Access Modernization Program would not result in physical alteration of the structure and materials of the Theme Building, therefore, the Theme Building would remain eligible for listing in the National Register, a listed resource in the California Register, and a designated LAHCM. However, while the physical materials and form of the Theme Building would remain intact, alteration of its surroundings by the LAX Landside Access Modernization Program would result in “material impairment” as defined by CEQA, because unique features of its architectural design as well as its original function would be substantially obscured, reducing its ability to convey its historic significance. With implementation of mitigation for the LAX Landside Access Modernization Program (Mitigation Measure MM-HR (LAMP)-1), impacts to the Theme Building would be reduced, but not to a level that would be less than significant. In connection with its approval of the LAX Landside Access Modernization Program,

¹⁰⁵ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, September 2016.

¹⁰⁶ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Specific Plan Amendment Study*, (SCH 1997061047), Chapter 5, Cumulative Impacts, January 2013.

the Board of Airport Commissioners found that there are no other feasible measures that could be adopted to reduce impacts to the Theme Building further while still achieving the objectives of the LAX Landside Access Modernization Program.^{107,108} In addition, other cumulative terminal improvement projects, namely the LAX Terminal 1.5 Project and the LAX Terminals 2 and 3 Modernization Project, would contribute to a cumulative impact to the Theme Building. These two projects propose new passenger processing buildings in the CTA, north of the Theme Building and across World Way. Although it was determined that neither project would have a project-specific impact on the Theme Building, the combination of the LAX Landside Access Modernization Program, the LAX Terminal 1.5 Project, and the LAX Terminals 2 and 3 Modernization Project would result in a significant cumulative impact on the Theme Building.^{109,110}

The LAX Landside Access Modernization Program has the potential to result in a significant impact to the 1961 ATCT. Demolition of the adjacent two-story Administration Building and construction of the APM guideway have the potential to damage or destroy character-defining features of the 1961 ATCT, which would result in a substantial adverse change in the significance of this historical resource. However, with implementation of mitigation for the LAX Landside Access Modernization Program (Mitigation Measure MM-HR (LAMP)-2), impacts to the 1961 ATCT would be reduced to a level that is less than significant. The LAX Terminal 1.5 Project and the LAX Terminals 2 and 3 Modernization Project are not located in proximity to the 1961 ATCT and would not contribute to cumulative impacts to this historical resource. The Concourse 0 project would be located across World Way from the 1961 ATCT. Due to the distance of the Concourse 0 project from the 1961 ATCT, construction activities associated with this project would not have the potential to damage or destroy features of the 1961 ATCT and would not contribute to cumulative impacts to the 1961 ATCT. Moreover, the 1961 ATCT no longer retains integrity of setting, therefore, the improvements associated with these projects would not result in impacts to the 1961 ATCT.

The United Airlines East Aircraft Maintenance/Ground Support Equipment (GSE) Project would require the demolition of the existing buildings. The environmental documentation for the United Airlines project is currently underway. For purposes of this EIR, it is assumed that impacts to this historical resource from the United Airlines project will be determined to be significant and unavoidable. No other cumulative projects would contribute to impacts to the Intermediate Terminal Facility.

The proposed project is located on the west side of the airport and would not have a direct or indirect impact on the Theme Building, the 1961 ATCT, or the Intermediate Terminal Facility. However, as indicated in Section 4.2.5, the proposed project would have a significant impact on the CAL GO Building, which is another historical resource associated with the history and development of LAX. The combination of the proposed project and other cumulative projects at LAX, most notably the LAX Landside Access Modernization Program as well as the United Airlines East Aircraft Maintenance/GSE Project, would result in a significant cumulative impact on historical resources at LAX and the contribution of the proposed project (i.e., the direct impact to the CAL GO Building) to this impact would be cumulatively considerable. As discussed in Section 4.2.3.1.3 above, in 2016, LAWA prepared the LAX Preservation Plan.¹¹¹ The preservation plan identified all historic resources located on the LAX property and designated certain historic resources for preservation. The Plan is intended to “serve as the framework for the future repair, maintenance, and alteration of historic resources located on the LAX property and guide the planning of future projects.” The Preservation Plan identifies five buildings, one structure, and one object that will be preserved. These

¹⁰⁷ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH No. 2015021014), Section 4.4, Cultural Resources, September 15, 2016.

¹⁰⁸ City of Los Angeles, Los Angeles World Airports, *California Environmental Quality Act Findings, LAX Landside Access Modernization Program*, February 2017. Available: [http://www.lawa.org/connectinglax/files/LAX_LAMP_CEQA-Findings_20160216\(SECURED\).pdf](http://www.lawa.org/connectinglax/files/LAX_LAMP_CEQA-Findings_20160216(SECURED).pdf).

¹⁰⁹ City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport Terminal 1.5 Project Final Initial Study/Mitigated Negative Declaration*, November 2016.

¹¹⁰ City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport Terminals 2 and 3 Modernization Project Notice of Preparation and Initial Study*, August 2016.

¹¹¹ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, September 2016.

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include the Theme Building and the 1961 ATCT. The CAL GO Building is not identified for preservation, nor is the Intermediate Terminal Facility. However, as discussed in Section 4.2.3.1.3 above, any project at LAX, including the proposed SAAP, that requires extensive alteration or demolition of the CAL GO Building would require LAWA to notify the OHR and submit plans that include a documentation plan to fully document the CAL GO Building. LAWA has committed to utilizing the LAX Preservation Plan to assist LAWA in preserving and evaluating its historic resources, which would reduce impacts to historical resources at LAX that would be affected by the proposed project and other cumulative projects at LAX discussed above (i.e., the Theme Building, 1961 ATCT, Intermediate Terminal Facility, and CAL GO Building).¹¹²

4.2.6.2 Archaeological Resources, Paleontological Resources, and Human Remains

Excavation associated with other development projects at or near LAX has the potential to encounter previously undiscovered archaeological or paleontological resources or human remains, which could result in cumulative impacts to these resources. No known archaeological resources, paleontological resources, or human remains are located on, or adjacent to, the proposed project site. The project area is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities. Thus, surficial archaeological resources, paleontological resources, and human remains that may have existed at one time have likely been displaced by these disturbances. While discovery of archaeological resources, paleontological resources, or human remains in artificial fill deposits within the project area is unlikely, excavations associated with the proposed project could occur below the fill levels could impact unique archaeological resources, unique paleontological resources, or human remains that have not been disturbed or displaced by previous development. As identified in Sections 4.2.5.2 and 4.2.5.3, the potential for the proposed project to adversely affect previously unknown unique archaeological or paleontological resources could be significant. As discussed in Section 4.2.5.4, with compliance with existing regulatory procedures governing the treatment of human remains encountered during construction, the impacts of the proposed project on human remains would be less than significant.

With respect to archaeological and paleontological resources, the same potential for encountering previously undiscovered archaeological and unique paleontological resources that is associated with the proposed project exists for other cumulative projects at LAX that would include construction excavations. These potential impacts could be cumulatively significant when viewed in combination. The proposed project's contribution to significant cumulative impacts to archaeological and paleontological resources, without mitigation, would be cumulatively considerable.

With respect to human remains, guidance as to the treatment of human remains that could be encountered during construction excavations, such as 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, would apply to cumulative projects as well as to the proposed project. With compliance with these regulations, cumulative impacts from disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant.

4.2.7 Mitigation Measures

4.2.7.1 Historical Resources

As indicated in Section 4.2.5.1, impacts of the proposed project on historical resources would be significant. The following mitigation measure is proposed to reduce significant impacts to historical resources.

¹¹² City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Section 4.4, Cultural Resources, p. 4.4-55, September 2016.

- **MM-HR (SAAP)-1. Conformance with LAWA's LAX Preservation Plan.**

Prior to initiation of any demolition activities, LAWA shall notify the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR) and shall submit the Historic Building Documentation report for the CAL GO Building.

As discussed in Section 4.2.5.1 above, the proposed project would require the demolition of the former CAL GO Building, which has been found individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. 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 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."¹¹³ When data recovery is the only feasible mitigation, studies shall be deposited with the applicable CHRIS Information Center. As discussed in Section 4.2.5.1 above, LAWA has completed recordation of the CAL GO Building in accordance with HABS standards (the report, titled *Historic Building Documentation, Continental Airlines General Office Building*, is provided in Appendix B-2), and has deposited the resulting documentation with the South Central Coastal Information Center at California State University, Fullerton, which is the CHRIS Information Center for Los Angeles County (documentation was also provided to the Flight Path Learning Center and Museum). In addition to these regulatory requirements, Mitigation Measure MM-HR (SAAP)-1 would require conformance with LAWA's LAX Preservation Plan, which, as discussed in Section 4.2.3.1.3 above, requires that, for any project that would involve extensive alteration or demolition of the CAL GO Building, LAWA shall notify the OHR and submit plans that include a documentation plan to fully document the CAL GO Building. In the case of the CAL GO Building, the documentation has already been implemented; therefore, LAWA will submit the completed documentation to OHR. No additional mitigation is available to address the impact to the CAL GO Building.

4.2.7.2 Archaeological Resources

As indicated in Section 4.2.5.2, impacts of the proposed project on archaeological resources could be significant, if previously unknown resources are encountered during construction. The following Standard Control Measures are proposed as mitigation measures to reduce significant impacts to archaeological resources.

- **LAX-AR-1. Conformance with LAWA's Archaeological Treatment Plan.**

Prior to initiation of any project-related grading or excavation activities, LAWA shall retain an on-site Cultural Resource Monitor (CRM), as defined in LAWA's Archaeological Treatment Plan (ATP), who will determine if the proposed project is subject to archaeological monitoring. Monitoring, if required, will be subject to the provisions identified below.¹¹⁴

Monitoring Requirements. In accordance with the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans that provide details about the extent and depth of project-related grading and other development-related data, such as geotechnical investigations that include soils borings and delineation of subsurface strata types. If the CRM determines that all or specific portions of the proposed project area warrant archaeological monitoring during grading activities, a qualified archaeologist shall be retained by LAWA to inspect excavation and grading activities that occur within native material.

¹¹³ State of California, Office of Historic Preservation, *How Can Substantial Adverse Change be Avoided or Mitigated?* Available: http://ohp.parks.ca.gov/?page_id=21727, accessed May 22, 2017.

¹¹⁴ 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: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf.

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Identification, Evaluation, and Recovery. Should archaeological resources be discovered, preservation in place is the preferred manner for mitigating impacts to archaeological sites. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

Reporting and Curation. Reporting shall be completed in conformance with the guidelines set forth by the Office of Historic Preservation for Archaeological Research Management Reports and requirements established in the ATP. Proper curation and archiving of artifacts shall be conducted in accordance with industry and federal standards and as outlined in the ATP.

- **LAX-AR-2. Archaeological Resources Construction Personnel Briefing.**

Prior to initiation of grading activities, LAWA shall require the consulting archaeologist to provide construction personnel with a briefing in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur.

4.2.7.3 Paleontological Resources

As indicated in Section 4.2.5.3, impacts of the proposed project on paleontological resources could be significant, if previously unknown resources are encountered during construction. The following Standard Control Measures are proposed as mitigation measures to reduce significant impacts to paleontological resources.

- **LAX-PR-1. Conformance with LAWA's Paleontological Management Treatment Plan (PMTP).¹¹⁵**

Prior to initiation of grading activities, LAWA shall retain a professional paleontologist. If the project site is determined to exhibit a high potential for paleontological resources, paleontological monitoring shall be conducted by a professional paleontologist. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP.

Monitoring Requirements. In accordance with the PMTP, LAWA shall supply the paleontological monitor (PM) with a construction schedule and any construction, grading, excavation and/or shoring plans, along with access to relevant geotechnical studies prior to the initiation of ground-disturbing activities. If excavation activities are scheduled to go below the documented level of fill materials, paleontological monitoring shall be initiated when formational sediments are expected to be reached by earthmoving activities.

Identification, Evaluation, and Recovery. The PM or PM designee shall identify, evaluate, and recover paleontological resources in accordance with the relevant provisions of the PMTP.

- **LAX-PR-2. Paleontological Resources Construction Personnel Briefing.**

Prior to initiation of grading/ground-disturbing activities, LAWA shall require the PM or PM designee to brief project engineers, project inspectors, construction foreman, drillers and heavy equipment operators in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

4.2.7.4 Human Remains

As indicated in Section 4.2.5., impacts from disturbance of any human remains would be less than significant; therefore, no mitigation measures are required.

¹¹⁵ City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, revised December 2005. Available: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Paleontological_Management_Treatment_Plan.pdf.

4.2.8 Level of Significance After Mitigation

4.2.8.1 Historical Resources

Implementation of Mitigation Measure MM-HR (SAAP)-1 would address significant impacts of the project to the CAL GO Building, which has been found to be individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a potential historic district eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, but would not reduce impacts to a level that is less than significant or less than cumulatively considerable. No other feasible mitigation measures are available that would further reduce impacts to the CAL GO Building. Therefore, impacts to historical resources from the proposed project would be significant and unavoidable.

4.2.8.2 Archaeological Resources

With implementation of Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2, potentially significant impacts to archaeological resources that are historical resources or unique archaeological resources would be reduced to a level that is less than significant and the contribution of the proposed project to potentially significant cumulative impacts on archaeological resources would not be cumulatively considerable.

4.2.8.3 Paleontological Resources

With implementation of Standard Control Measures (Mitigation Measures) LAX-PR-1 and LAX-PR-2, potentially significant impacts to unique paleontological resources would be reduced to a level that is less than significant and the contribution of the proposed project to potentially significant cumulative impacts on unique paleontological resources would not be cumulatively considerable.

4.2.8.4 Human Remains

Impacts from disturbance of human remains would be less than significant.

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