
Appendix B – Historic Resources

B-1 Historic Resources Technical Report



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HISTORIC RESOURCES GROUP

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CDM Smith
111 Academy Way, Suite 150
Irvine, CA 92617

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The purpose of this technical report is to determine if “historical resources” as defined by the California Environmental Quality Act (CEQA)¹ are located within and adjacent to the areas affected by the proposed Secured Area Access Post (SAAP) Project at Los Angeles International Airport (LAX) and, if so, to identify potential impacts to historical resources caused by the Project. This report is intended to inform environmental review of the proposed Project.

Under CEQA the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have a significant adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through feasible alternatives or mitigation measures. The impacts of a project on an historical resource may be considered an environmental impact. CEQA states that:

*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.*²

Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to an historical resource or resources, and if so, (2) a determination of whether the proposed project will result in a “substantial adverse change” in the significance of the resource or resources. This report investigates the Project site to determine if historical resources exist and analyzes potential impacts for any adverse change in the significance of such resources.

1.1 Area of Investigation

The proposed Project would occupy a 4.1-acre site located within the western portion of the LAX property parallel to and south of World Way West. The Project site includes paved areas currently used for vehicle parking and the former Continental Airlines General Office Building (General Office Building) which is currently vacant. The General Office Building is connected to a larger hangar and shop complex on its south side. The hangar and shop complex buildings are outside of the Project site.

1.2 Methodology

Evaluation of historic significance is based on research of the relevant historic contexts and an analysis of the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City

¹ California PRC, Section 21084.1.

² Ibid.

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of Los Angeles Historic-Cultural Monument. Potential historic resources were considered as individual resources and as potential contributors to a historic district where relevant.

Research

This report was prepared using primary and secondary sources related to the development history of LAX and its immediate surrounding area. The following sources were consulted (refer to the Bibliography at the end of this report):

1. Historic building permits
2. Historic photographs, aerial photos and site plans
3. Published local histories and archival newspaper articles
4. Previous environmental review documents and historic resources evaluations for LAX³
5. California State Historic Resources Inventory (HRI) for Los Angeles County⁴
6. Department of Parks and Recreation Historic Resources Inventory Forms

Physical Evaluation

Assessment of historic integrity, and identification of character-defining features were conducted through on-site inspection of the Project site in 2015 and again in 2016.

1.3 Project Team

Research, evaluation, field inspection, and analysis were performed by Paul Travis, AICP, Principal and Senior Preservation Planner; John LoCascio, AIA, Senior Preservation Architect; and Peyton Hall, FAIA, Managing Principal. All are qualified professionals who meet the Secretary of the Interior's Professional Qualification Standards.

³ 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; PCR Services Corporation. "Appendix I: LAX Master Plan EIS/EIR. Section 106 Report," January 2001; PCR Services Corporation, Draft Historic Resources Assessment Report: Continental Airlines Facilities, 7300 Maintenance Road (APN: 4129-026-903) and 7300 World Way West (APN: 4129-026-903), Los Angeles, Los Angeles County, California, September 2013.

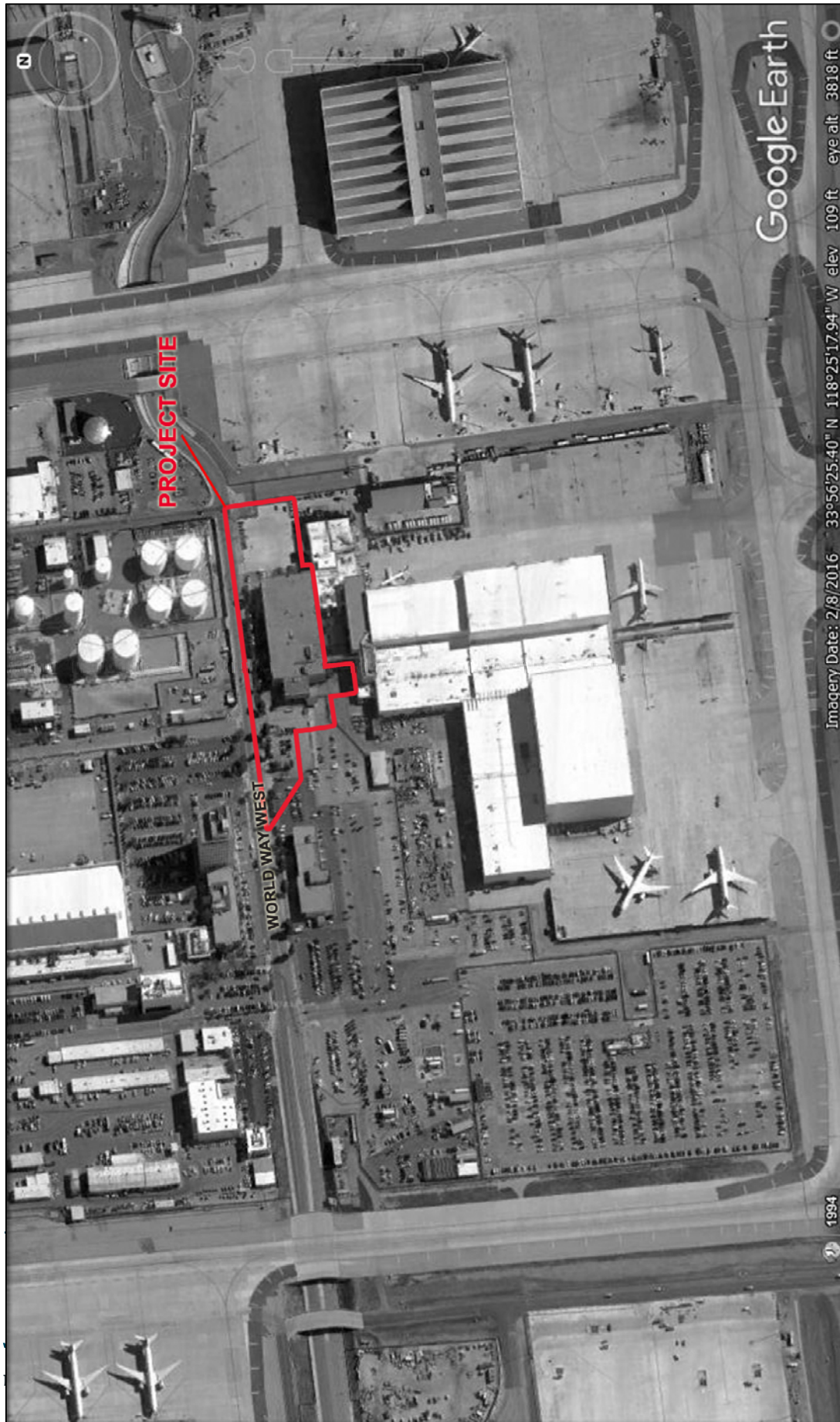
⁴ Historic Resources Inventory, California State Office of Historic Preservation, August 2011.

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Figure 1: Project Site Location



2.1 Regional Setting

The Project site is located within the City of Los Angeles, at LAX. The Project site is located within the LAX Plan area of the City of Los Angeles, which is in the County of Los Angeles. LAX is the primary airport for the greater Los Angeles area, encompassing approximately 3,800 acres, and is situated at the western edge of the City of Los Angeles.

In the LAX vicinity, the community of Westchester is located to the north, the City of El Segundo is to the south, the City of Inglewood and unincorporated portions of Los Angeles County are to the east, and the Pacific Ocean lies to the west. Regional access to LAX is provided by Interstate 105 (I-105), which runs east-west and is located adjacent to LAX on the south, and the San Diego Freeway (Interstate 405 or I-405), which runs north-south and is located east of LAX. Access to the west side of the airport is via Imperial Highway and off Pershing Drive.

2.2 Local Setting and Land Uses

The 4.1-acre Project site is located within the western portion of LAX parallel to and south of World Way West. The land use setting around the Project site is characterized by airport operations and aircraft maintenance facilities. Existing adjacent uses include: the LAX Fuel Farm and LAWA administrative offices/vehicle parking to the north and northwest, respectively; a remain overnight (RON) aircraft parking area to the east; the American Airlines (AA) Operations Support Facility (OSF), AA Engineering Building, United Airlines Maintenance Hangar, and Los Angeles Fire Department (LAFD) Fire Station 80/Aircraft Rescue and Fire Fighting Facility (ARFF) to the south; and the former CAL Training Building (vacant) to the west. The Los Angeles International Airport Plan (LAX Plan), the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the Project site as Airport Airside. The corresponding LAX Specific Plan designates this area as LAX-A Zone: Airport Airside Sub-Area.

2.3 Secured Area Access Post Facility

The purpose of the proposed project is to construct a new SAAP to provide a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of LAX. A new SAAP is needed on the west side to replace SAAP 5, which was displaced by the Midfield Satellite Concourse (MSC) North Project, and SAAP 21,

⁵ Draft description of existing conditions and the proposed project as provided by CDM Smith.

which was removed to enable the full build-out of the West Aircraft Maintenance Area. The proposed SAAP would be the sole full-access SAAP on World Way West.

The new SAAP would be located parallel to and south of World Way West, near where the road will terminate at Coast Guard Road once the MSC North Project is completed. The proposed SAAP would accommodate all types of vehicles that require access to the AOA (construction, aircraft service vehicles, vendors, LAWA, etc.). Its elements would be the prototype for any future SAAPs and/or improvements to existing SAAPs at LAX. The new SAAP facility would have a land footprint of approximately 1,200 feet by 150 feet, consisting primarily of paved areas with various pieces of equipment to control access (gates, traffic lights, signage, vehicle arrest systems, security fencing, etc.), vehicle inspection equipment (license plate readers, under-vehicle scanners, etc.), and facilities and shelter for inspection staff, including two canopy structures spanning the width of the first and last inspection station, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 square feet (SF) and would include monitoring equipment and a restroom facility. New lighting associated with the proposed project would include security lighting on the new guard station buildings, canopy lighting, roadway lighting, and perimeter fence lighting along the last inspection station. All external lights would be shielded and focused to avoid glare and prevent unnecessary light spillover.

Construction of the new SAAP would require the demolition and removal of the former Continental Airlines General Office Building, which is vacant, and associated facilities. (As discussed in Section 5.1 below, the General Office Building is eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is a contributor to a California Register-eligible historic district.)

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3.1 Historical Resources under CEQA

CEQA requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which causes a substantial adverse change on an historical resource also has a significant effect on the environment.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. Pursuant to Section 15064.5 of the CEQA Guidelines, a “substantial adverse change” means “demolition, destruction, relocation, or alteration of a resource or its surroundings such that the significance of an historical resource would be materially impaired.”

CEQA defines an historical resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historical resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of Public Resources Code 5024.1 (g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing in the California Register (PRC Section 5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historic resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an “historical resource” for purposes of CEQA.

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Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

3.2 Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is 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.⁶ The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act.⁷ Furthermore, state and local regulations may apply to properties listed in the National Register.

⁶ 36 Code of Federal Regulations (CFR) 60, Section 60.2.

⁷ Section 106 of the National Historic Preservation Act 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). 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

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The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody 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
- D. That have yielded, or may be likely to yield, information important in prehistory or history.⁸

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of *location, design, setting, materials, workmanship, feeling, and association*.

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁹

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

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

⁸ 36 CFR 60, Section 60.4.

⁹ California PRC, Section 5024.1(a).

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1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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 includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory) the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.¹⁰

Other resources which may be nominated for listing in the California Register include:

- Individual historical resources.
- Historical resources contributing to the significance of an historic district.
- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g).

¹⁰ California PRC, Section 5024.1(d).

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- Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.¹¹

Local Designation Programs

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission.

Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code defines an historical or cultural monument as:

"... a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age."

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for Historic Cultural Monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

¹¹ California PRC, Section 5024.1(e).

Significance

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register:

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.¹² It is achieved in several ways:

- *Association with important events, activities or patterns*
- *Association with important persons*
- *Distinctive physical characteristics of design, construction, or form*
- *Potential to yield important information*

A property may be significant individually or as part of a grouping of properties.

Historic Integrity

Historic integrity is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”¹³ The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

¹² *National Register Bulletin 16A. How to Complete the National Register Registration Form*. Washington D.C.: National Park Service, U.S. Department of the Interior, 1997. (3)

¹³ *Ibid*, p. 3.

- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.¹⁴

3.4 Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic *districts*. The National Park Service defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”¹⁵ A historic district derives its significance as a single unified entity.

According to the National Park Service, “a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages.¹⁶

Resources that have been found to contribute to the historic identity of a district are referred to as *district contributors*. Properties located within the district boundaries that do not contribute to its significance are identified as *non-contributors*.

3.5 Age Threshold

The fifty-year age threshold has become standard in historic preservation as a way to delineate potential historic resources. The National Park Service, which provides guidance for the practice of historic preservation, has established that a resource fifty years of age or older may be considered for listing on the National Register of Historic

¹⁴ *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of Interior, 1995.

¹⁵ *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997. (5)

¹⁶ *Ibid.*

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Places. The National Register Criteria for Evaluation exclude properties that achieved significance within the past fifty years unless they are of *exceptional importance*. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance.¹⁷

Criteria for listing in the California Register of Historical Resources do not specify any minimum age requirement for consideration of historic significance although it is understood that a sufficient period of time would need to have passed so that the resource can be evaluated within its appropriate context. Technical assistance provided by the California State Office of Historic Preservation states “In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.”¹⁸

In the City of Los Angeles, “there is no requirement that a resource be a certain age before it can be designated”¹⁹ as a Los Angeles Historic-Cultural Monument. The City’s Office of Historic Resources does qualify, however that “enough time needs to have passed since the resource’s completion to provide sufficient perspective that would allow an evaluation of its significance within a historical context.”

¹⁷ Ibid. p. 2.

¹⁸ *California Office of Historic Preservation Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)* State of California Office of Historic Preservation, Department of Parks and Recreation (3)

¹⁹ City of Los Angeles Office of Historic Resources website, accessed February 2011.
<http://www.preservation.lacity.org/faq>

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Much of the following information has been excerpted from the “LAX Master Plan EIS/EIR Appendix I Section 106 Report,” prepared by PCR Services Corporation in January of 2001. Information specific to Continental Airlines and the development of the Continental Airlines facilities at LAX were largely excerpted from a draft historic assessment report of the LAX Continental Airlines Facilities prepared by PCR Services Corporation in September 2013.²⁰ Other sources are otherwise noted.

4.1 Early Land Use

Prior to its development as an airport, the land currently occupied by LAX was part of Rancho Sausal Redondo, which had been granted to Antonio Ygnacio Avila by the Mexican government in 1837. Typical of the Spanish and Mexican land grant ranchos, the land was used for cattle ranching and sheep grazing.

After the Mexican-American War (1846-1848) and subsequent annexation of California by the United States, the Rancho Sausal Redondo changed hands a number of times and was combined with other properties, which were later disaggregated. In 1894, a 2,000-acre portion of the property was leased to local farmer Andrew B. Bennet. This property became known as the Bennett Rancho, and was used to grow crops.

4.2 Airport Development 1928-1951

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

In 1928, the Los Angeles Department of Airports (DOA) was established to administer the airport. The airport constructed its first permanent building -- Hangar One -- in 1929

²⁰ PCR Services Corporation, Draft Historic Resources Assessment Report: Continental Airlines Facilities, 7300 Maintenance Road (APN: 4129-026-903) and 7300 World Way West (APN: 4129-026-903), Los Angeles, Los Angeles County, California, September 2013.

and development continued that year with the construction of administrative offices, a runway, and additional hangars.

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 airlines²¹ 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”.

Los Angeles’ postwar economic growth would effectively mandate continued improvements. Between 1947 and 1952, the number of travelers using or passing through the airport increased over 50 percent.²² By 1950, all facilities were operating beyond their capacity. Using airport revenue and some federal funding, the airport was able to make several upgrades including runway expansions, terminal building expansions, more parking facilities and the Sepulveda Avenue tunnel under expanded runways.

4.3 The “Jet Age”

Jet passenger service began in the United States in the late 1950s with the introduction of the Boeing 707 and Douglas DC-8. Pan-American World Airways introduced overseas flights on Boeing 707 planes in October 1958, and Continental Airlines introduced jet service in 1959. This began the “Jet Age,” which revolutionized air travel.

Between 1955 and 1972, air passenger numbers more than quadrupled. The rise in air traffic brought unprecedented demands on airports. “The fifties witnessed a rush to build or modernize facilities to keep up with demand.”²³ Airport planners understood that air travel was growing at a rapid pace, and would continue to do so for the foreseeable future. Therefore, Jet Age airport expansion needed to accommodate continued increasing demand for the foreseeable future.

²¹ United Airlines, TWA, Western Air, American Airlines, and Pan American Airways.

²² Schwartz, Vanessa R., “LAX Designing for the Jet Age,” essay included in Overdrive L.A. Constructs the Future 1940-1990, De Wit, Wim and Christopher James Alexander editors, Getty Research Institute, Los Angeles, CA. 2013 (167)

²³ William H. Young, and Nancy K. Young, *The 1950s* (Westport, CT: Greenwood, 2004, (265)

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Faced with a clearly inadequate infrastructure, in 1956 LAX officials hired Pereira & Luckman to master plan a facilities overhaul that would bring LAX into the Jet Age. The effort was a joint venture with the firms of Welton Beckett and Associates and Paul R. Williams joining Pereira & Luckman. Airport improvements were funded by a voter-approved \$60 million bond.

The design at LAX was a rational and direct expression of the airport's purpose, utilizing a design aesthetic that emphasized simplicity and clarity of form. Terminal design at LAX adhered to a functional minimalism that was applied uniformly throughout the terminal area with identical low-rise terminal buildings subservient to the circulation and the flow of airport patrons. Punctuating the uniformly horizontal Central Terminal Area (CTA) with a 172-foot vertical tower, the 'new' (1961) Airport Traffic Control Tower (ATCT) and Administrative Building was located at the airport's eastern and primary entrance from Century Boulevard. Designed in a Mid-century Modern style, the steel frame and reinforced concrete building was composed of two main parts: an office building forming a low base, and the actual control tower that rises above.

Positioned on axis with the control tower at the geographic center of the CTA, the Theme Building was conceived as an alternative to the futuristic central building shown in early iterations of the plan.²⁴ Designed in an Expressionistic style, featuring two intersecting parabolic arches rising 135 feet from the ground, the building served as a public restaurant, the employee commissary, and housed the central kitchen facilities servicing all satellite restaurants throughout the airport. The building also had an observation deck open to the public. Given its public use and futuristic design, the Theme Building eventually became the iconic symbol of the new Jet Age airport.

Implementation of the 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.

4.4 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" 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

²⁴ Schwartz (173)

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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. A stylized eagle was established as the airline's corporate identity.

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.

Throughout the 1960s, Continental distinguished itself from its competitors by aggressively pursuing innovations in ticketing, connections and customer service which would ultimately become standard in the industry. This included the establishment of lower cost "economy" fares that proved to be very popular, dramatically increasing Continental passenger levels. As growth continued, Continental focused its business on long distance routes and gradually eliminated local service. In 1963, Continental relocated its headquarters from Denver to Los Angeles.²⁵ 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. Chartered services 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. Continental labor unions fiercely resisted the new management's

²⁵ "Continental Airlines to Move its Main Offices Here from Denver," *Los Angeles Times*, August 16, 1962 (B11)

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demands for wage-cuts and layoffs they claimed were necessary to keep the company competitive in the deregulation era. It was during this difficult time that Continental Airlines President, A. L. Feldman committed suicide in his office.

Continental was forced to file for bankruptcy in 1983 but was able to report major profits by 1986 due in large part to the purchase of Eastern Airlines through parent company Texas Air Company. The acquisition of Eastern Airlines created the largest airline system in the United States. Aggressive acquisition, needed fleet modernization and escalating fuel costs conspired to destabilize the company and Continental filed for bankruptcy a second time in 1990. Profits and financial stability were again restored by the late 1990s.

In May, 2010, United Airlines and Continental Airlines Inc. announced a \$3-billion merger that created the world's largest airline. United parent UAL Corporation bought Continental in an all-stock deal. 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.

4.5 Project Site 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 Airline's 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 Building was constructed north of the Flight Kitchen and service building, facing World Way West. The General Office 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 General Office Building, an open-air, concrete patio directly south of the General Office Building; and an enclosed second-floor pedestrian bridge connecting the General Office Building to the service complex.

A training center building for Continental Airlines was constructed in 1966 west of the General Office 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.

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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.

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Individual buildings, structures, objects and site features located within or adjacent to the Project site are examined in the following analysis for the purposes of identifying potential historic resources. As a framework for this assessment, HRG examined the entire Project site, inclusive of buildings, objects, structures and sites. To present a thorough assessment, buildings and structures were considered for their collective potential historic significance in addition to potential significance as individual resources.

5.1 Historic Resources located on the Project Site

The Project site contains one building, the former Continental Airlines General Office Building, located at 7270 World Way West. As noted in the previous section, the General Office 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.²⁶ 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 General Office Building.

²⁶ The September 2013 PCR report describes doors at this location but a site inspection reveals that no doors are present.

The interior of the General Office 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 General Office 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 General Office 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 General Office 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. (See below.)

5.2 Historic 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 is located west of the Project site and Continental Airlines General Office 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

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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 I, 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 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 General Office 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.)

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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 General Office 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.

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

Continental Airlines Complex

The Continental Airlines General Office 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 General Office 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. Therefore, the facility does not appear eligible for listing in the National Register. 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 listing in the

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California Register and as a City of Los Angeles Historic-Cultural Monument as a historic district.

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5.3 Summary of Findings

Investigation of the Project site and its immediate surroundings has identified the following:

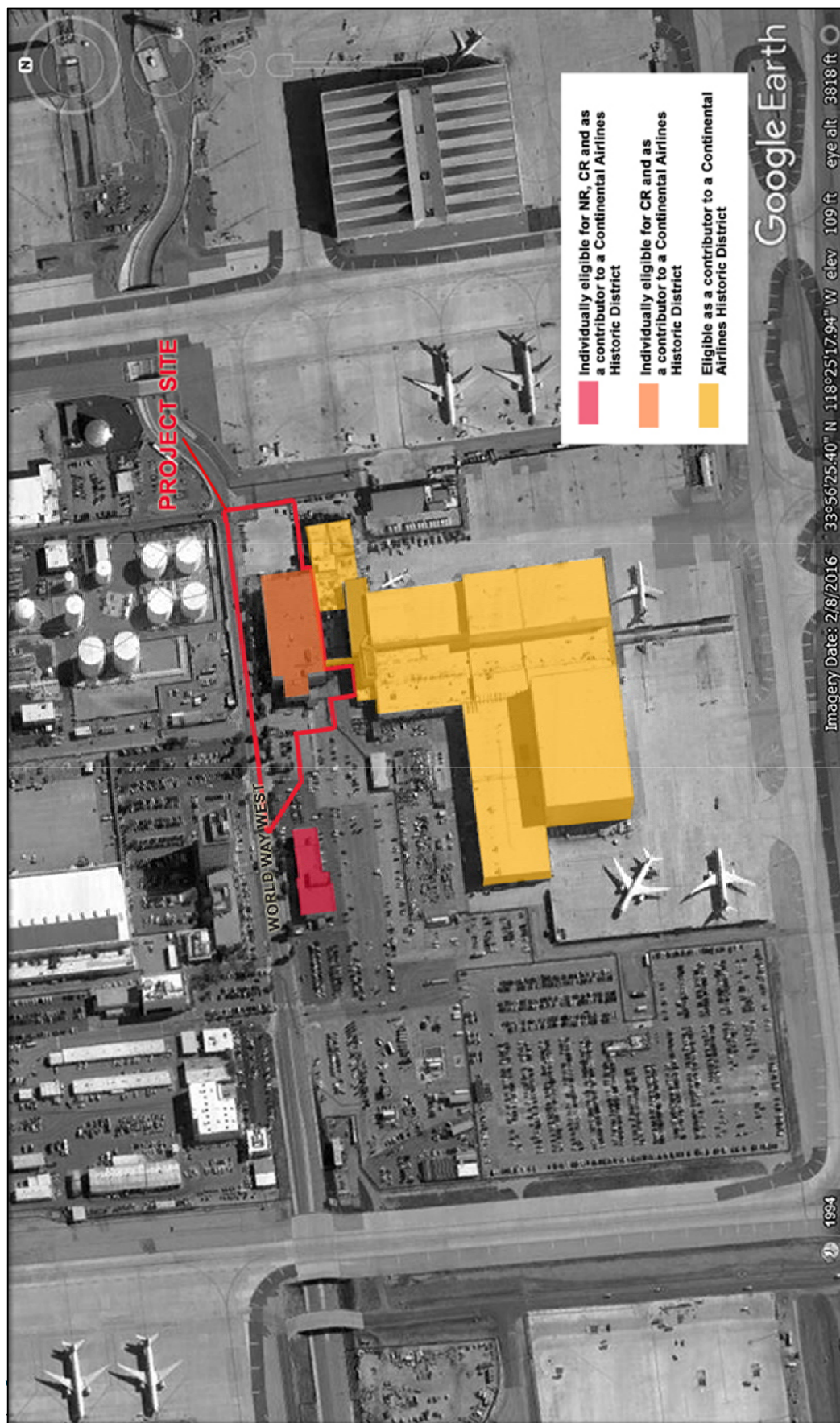
- The Project site contains one (1) building, the Continental Airlines General Office Building that has been found individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument, and is also a contributor to a potential historic district that is eligible for the California Register and as a City of Los Angeles Historic-Cultural Monument.
- One (1) building, the Continental Airlines Training Building is located in the immediate vicinity of the Project site and has been identified as individually eligible for listing in the National Register, the California Register, and as a City of Los Angeles Historic-Cultural Monument, and is also a contributor to a potential historic district that is eligible for the California Register and as a City of Los Angeles Historic-Cultural Monument.
- The Continental Airlines maintenance hangars, shops, offices and storage facilities are also located in the immediate vicinity of the Project site and are together considered a contributor to a potential historic district that includes the Continental Airlines Training Building and the Continental Airlines General Office Building. The maintenance facilities are not historically significant individually.

An aerial photograph highlighting the identified potential historic resources can be found in Figure 2.

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Figure 2: Project Area Historic Resources



6.1 Significance Threshold

The City of Los Angeles CEQA Thresholds Guide (2006, pages D.3-3 and D.3-4) states that 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 occurs if the project involves:

- 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.

In addition to this guidance provided by the City of Los Angeles, the State Legislature, in enacting the California Register, also amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project with an effect 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.²⁷ A substantial adverse change in the significance of an historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.²⁸

The Guidelines go on to state that “[t]he significance of an historical resource is materially impaired when a project... [d]emolishes 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 California

²⁷ *CEQA Guidelines*, section 15064.5(b).

²⁸ *CEQA Guidelines*, section 15064.5(b) (1).

Register of Historical Resources... local register of historical resources... or its identification in an historical resources survey.”²⁹

6.2 Discussion of Potential Impacts to Historical Resources

As discussed in Section 5 of this report, investigation of the Project site revealed one (1) building, the former Continental Airlines General Office Building, that appears individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. The General Office Building also appears eligible as a contributor to a potential Continental Airlines Historic District which, in addition to the General Office Building, includes the maintenance complex of hangars, shops, offices and storage facilities located immediately south of the General Office Building; and the Continental Airlines Training Center Building located west of the General Office Building. Both the Continental Airlines Training Center Building and the maintenance complex are located outside and immediately adjacent to the Project site.

Potential Impacts Related to Demolition

The proposed Project would involve demolition of the Continental Airlines General Office Building which has been found individually eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. Demolition of the General Office Building would result in a significant impact to an historical resource at the state and local levels. As discussed in Section 7.0 below, this impact cannot be mitigated to a level that is less than significant. However, LAWA has prepared archival photographic documentation of the General Office Building in accordance with Historic American Buildings Survey (HABS) standards to document the building and its character-defining features. One complete set of the documentation,³⁰ including 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 General Office Building was also found eligible as a contributor to a potential Continental Airlines Historic District which was found 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 General Office Building housed the administrative center for Continental’s 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 as well as the nearby Training Center Building

²⁹ *CEQA Guidelines*, section 15064.5(b)(2).

³⁰ Historic Resources Group, *Historic Building Documentation, Continental Airlines General Office Building*, January 2017.

housed functions ancillary to the General Office Building and it was through the General Office Building that the potential district's association with Continental Airlines was largely established. The General Office Building served historically as the administrative center of Continental Airlines and as the public face of Continental's complex of buildings. Demolition of the General Office 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 General Office Building, much of the potential district's association with Continental Airlines would be lost and the potential historic district would no longer be eligible for the California Register or as a City of Los Angeles Historic-Cultural Monument. For these reasons, demolition of the General Office Building would also result in a significant impact to the potential Continental Airlines Historic District. As discussed in Section 7.0 below, this impact cannot be mitigated to a level that is less than significant.

Potential Impacts Related to New Construction

As described in the Project Description in Section 2.0, the new SAAP facility would have a land footprint of approximately 1,200 feet by 150 feet, consisting primarily of paved areas with various pieces of equipment to control access (gates, traffic lights, signage, vehicle arrest systems, security fencing, etc.), vehicle inspection equipment (license plate readers, under-vehicle scanners, etc.), and facilities and shelter for inspection staff, including a canopy structure spanning the width of the first inspection station, and two guard station buildings, one at each of the first and last inspection stations. Each guard house would be approximately 350 SF and would include monitoring equipment and a restroom facility.

New construction associated with the Project would be located approximately 55 feet from the Continental Airlines Training Center Building at the closest point, and approximately 65 feet from the north edge of the complex of flight kitchen, hangars, shops and storage facilities that would remain after demolition of the General Office Building. The proposed new construction would not be substantial, but would consist primarily of paved roadway, canopy structures, two guard houses, gates, and fencing.

Because of its distance from the Training Center Building and remaining former Continental Airlines facilities complex, 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

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and unchanged. Therefore, new construction associated with the Project would not result in significant impacts to the remaining historical resources.³¹

6.3 Impact Analysis Using Los Angeles CEQA Thresholds

The following analysis uses the thresholds provided in the City of Los Angeles CEQA Thresholds Guide.

1. Would the Project involve the demolition of a significant resource?

Yes. The Project would require the demolition of the Continental Airlines General Office 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. Therefore, the Project would involve demolition of a significant historical resource.

2. Would the Project involve relocation that does not maintain the integrity of a significant resource?

No. The Project does not involve the relocation of any historical resource. Therefore, the Project would not involve relocation that does not maintain the integrity of a significant resource.

3. Would the Project involve 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?

Yes. The Project would alter the potential Continental Airlines Historic District by demolishing the Continental Airlines General Office Building, an important contributing building. Therefore, the Project would alter the potential historic district in a manner that does not conform to the Secretary of the Interior's Standards.

4. Would the Project involve construction that reduces the integrity or significance of important resources on the site or in the vicinity?

No. Both the Continental Airlines Training Center Building and the contributing flight kitchen, hangars, shops, and storage facilities are located a considerable distance from the proposed new construction (consisting primarily of paved roadway, canopy

³¹ The Initial Study prepared for the proposed SAAP project evaluated whether vibration from project construction would have an impact on nearby historic resources, including the Training Center Building and remaining former Continental Airlines facilities complex. The analysis 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.

structures, gates, two guard houses, and fencing) and their integrity and significance would not be further reduced by new construction associated with the Project.

6.4 Summary of Potential Impacts to Historical Resources

Analysis of potential impacts using the Los Angeles CEQA thresholds reveals that the Project would result in significant impacts to historical resources by demolishing the Continental Airlines General Office Building, which has been found individually eligible for 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. As discussed in Section 7.0 below, this impact cannot be mitigated to a level that is less than significant.

The Project would require the demolition of the former Continental Airlines General Office 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."³² When data recovery is the only feasible mitigation, studies shall be deposited with the California Historical Resources Regional Information Center (CHRIS). As noted in Section 6.2, LAWA has completed recordation of the General Office Building in accordance with HABS standards, 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 the completed recordation of the General Office Building in accordance with HABS standards, the following mitigation measure is proposed to reduce significant impacts to the General Office Building:

- 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 plans that include a documentation plan to fully document the General Office Building. LAWA will respond to any written comments received from OHR within 15 working days from the date the documents were submitted.

No additional mitigation is available to address the impact to the General Office building.

³² 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.

Even with LAWA's completed recordation of the General Office Building in accordance with HABS standards and implementation of the mitigation measure, Conformance with LAWA's LAX Preservation Plan, impacts of the proposed Project on the Continental Airlines General Office Building would remain significant and unavoidable.

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Mines Field c. 1930
Los Angeles Public Library Collection

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Los Angeles International Airport Intermediate Facilities c. 1955

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Central Terminal Area under Construction 1960
Los Angeles Public Library

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Central Terminal Area c.1962
Los Angeles Water & Power Collection

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Aerial Photograph of Continental Airlines Facilities, April 16, 1976
Flight Path Museum Archives

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



Continental Airlines General Office Building (2016)
North (primary) façade details.

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Continental Airlines Training Center Building (2016)
Looking southeast to north (primary) façade.



Maintenance Complex (2016)
Looking southeast to north facades.

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Flight Kitchen Building (2016)
Looking south to north façade.



Hangar Bays (2016)
Looking west to east facades.

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