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## **Appendix C – Historic Resources Technical Report**





LAX United Airlines East Aircraft  
Maintenance and GSE Project  
*Historic Resources Technical Report*  
June 2018

HISTORIC RESOURCES GROUP

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CDM Smith  
46 Discovery, Suite 250  
Irvine, CA 92618

The purpose of this technical report is to determine if “historical resources” as defined by the California Environmental Quality Act (CEQA)<sup>1</sup> are located within and adjacent to the areas affected by the proposed Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project (the proposed project) 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 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.”<sup>2</sup>*

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 proposed 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 35-acre site located within the eastern portion of LAX, parallel to and south of Century Boulevard. The project site is shown in Figure 1.

### 1.2 Methodology

Evaluation of historic significance is based on a review of existing historic designations, 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 or the California Register of Historical Resources, or for designation as a City of Los Angeles Historic-Cultural Monument.

#### Research

This report was prepared using primary and secondary sources related to the development history of LAX and its immediate surrounding area. The following documents were consulted:

<sup>1</sup> California Public Resources Code (PRC), Section 21084.1.

<sup>2</sup> California PRC, Section 21084.1.

- Historic building permits
- Historic photographs, aerial photos and site plans
- Published local histories
- Previous environmental review documents for LAX
- California State Historic Resources Inventory (HRI) for Los Angeles County
- Department of Parks and Recreation Historic Resources Inventory Forms

A list of sources is included in the Bibliography beginning on page 29 of this report.

#### Physical Evaluation

Site evaluations were conducted through on-site inspection of buildings and structures located on the proposed project site in 2015.

#### **1.3 Project Team**

Research, evaluation, field inspection, and analysis were performed by Paul Travis, AICP, Principal and Senior Preservation Planner and John LoCascio, AIA, Senior Preservation Architect. Additional research and site documentation were conducted by Robby Aranguren, Planning Associate. All are qualified professionals who meet the Secretary of the Interior's Professional Qualification Standards.

Figure 1: Project Site





### 2.1 Introduction

Los Angeles World Airports (LAWA) is the lead agency for the Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project (referred to hereafter as the proposed project). The intent of the proposed project is to consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport.

The proposed project would redevelop an approximately 35-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. LAWA is planning to relocate the Quonset Hut to a different location on the airport. This relocation is planned as part of LAWA's ongoing management of historic resources at LAX and is consistent with the preservation of this resource outlined in the LAX Preservation Plan.<sup>4</sup> The relocation will occur independently of the proposed project.

### 2.2 Site Description

The 35-acre project site is located within the eastern portion of LAX, parallel to and south of Century Boulevard. The project site includes UAL's existing 32-acre maintenance leasehold, which consists of paved areas currently used for UAL aircraft and GSE maintenance, with two large maintenance bays (6000-6016 Avion Drive and 6020-6024 Avion Drive), apron areas, maintenance areas, storage, office space, and surface parking. UAL's cargo building is adjacent to the project site to the northeast. A small portion of UAL's adjacent cargo leasehold would be used for project-related electrical equipment, as would a three-acre parcel to the north of UAL's existing facility, which is currently used as an airport shared-ride vehicle holding lot.

The project site includes an area formerly known as the Intermediate Terminal Facility, which is located east of the existing LAX Central Terminal Area on the western and southern sides of Avion Drive. Specifically, 6000-6016 Avion Drive and 6020-6024 Avion Drive comprise two of the three remaining buildings of the Intermediate Terminal Facility. (The third building, which is located adjacent to the project site to the northwest, is currently occupied by Mercury Air Cargo.) The proposed project site also includes a Quonset hut, and several storage and maintenance sheds.

The setting around the project site is characterized by airport operations, aircraft maintenance facilities, and air cargo facilities.

<sup>3</sup> Description of the proposed project is excerpted from information provided by CDM Smith and is consistent with the project description contained within the Draft Environmental Impact Report.

<sup>4</sup> "Los Angeles International Airport Preservation Plan," pp. 30-31, prepared by Historic Resources Group, September 2016.

## 2.3 Project Components

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The intent of the proposed project is to consolidate and modernize existing UAL aircraft maintenance facilities at LAX. Most of the buildings that comprise the existing East Maintenance Facility were constructed in the mid to late 1940s and the building systems have not been significantly upgraded, are inefficient, and are at or beyond their useful lives. In addition, the size of the existing hangars and layout of the apron area do not match current aircraft or GSE fleet requirements.

The main elements of the proposed project are:

- Demolish the existing buildings associated with the East Maintenance Facility, with the exception of the Quonset Hut, which is planned for relocation by LAWA prior to, and independent of, the proposed project.
- Construct and operate a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet, and consisting of the following elements:
  - Two wide body aircraft hangar bays with approximately 160,000 square feet of floor area and a height of approximately 110 feet, able to serve both narrow-body and wide-body aircraft
  - Aircraft maintenance shops with approximately 74,000 square feet of floor area
  - Aircraft parts/supplies stores with approximately 60,000 to 75,000 square feet of floor area, and an associated storage yard
  - A GSE maintenance facility with approximately 45,000 to 50,500 square feet of floor area, 15 GSE bays, 2 paint bays, 1 wash bay, electric GSE (eGSE) charging stations, and an associated storage yard
  - Facility maintenance area with approximately 2,000 square feet of floor area
  - Approximately 10,000 square feet of dock and skywalk support areas
  - Approximately 40,000 to 60,000 square feet of building circulation and support
- Replace/resurface a portion of the apron area and restripe aircraft parking positions.
- Reconfigure the apron and include aircraft parking positions in the hangar for a total of 22 aircraft parking positions on the leasehold, including 6 in the hangar, 6 on the south side of the project site, and 10 within the western portion of the leasehold.

- Provide an aircraft wash pad in a contained area for conducting dry washes of aircraft.<sup>5</sup>
- Construct a jet blast deflector, also referred to as a blast fence, on the eastern portion of the project site for the purpose of conducting aircraft engine run-ups. With this blast fence, the proposed project would accommodate aircraft engine run-up activities that would be conducted at the East Aircraft Maintenance Facility approximately 90 percent of the time; the remaining run-ups would occur at other facilities within the airfield).<sup>6</sup>
- Relocate and/or remove utilities, including water and wastewater pipelines, storm drain facilities, clarifiers, fuel lines, and an onsite triturator.<sup>7</sup>
- Replace existing paint booths at the East Maintenance Facility with a new spray booth, which would be required to meet Best Available Control Technology (BACT).<sup>8</sup>
- Install a diesel-powered backup generator to provide emergency power and transformer equipment on a small portion of the adjacent UAL cargo yard.
- Vacate the east-west portion of Avion Drive that abuts Parking Lot H to the north and relocate Avion Drive south of Parking Garage F, which is located north of the existing shared-ride van lot on the south side of Century Boulevard, as a one-way street with travel from east to west.
- Relocate employee parking from Parking Lot H to Parking Garage F.

With project implementation, the square footage of the maintenance buildings occupied by UAL would be substantially lower than the total square footage of the current east and west maintenance facilities. In addition, UAL would have fewer aircraft parking positions at LAX. Despite these changes, current maintenance activities would not be substantially reduced with project implementation. Rather, building space and ramp areas would be used more efficiently and some maintenance would be performed at passenger gates.

<sup>5</sup> Aircraft dry washing is a process that removes airport film, dust, and small accumulations of dirt and soil without the use of water.

<sup>6</sup> A jet blast deflector, or blast fence, is a safety barrier that is used to substantially reduce or eliminate the damaging effects of jet blast or propeller wash from run-up areas (U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular AC 150/5300-13A, *Airport Design*, September 28, 2012, updated February 26, 2014). Aircraft engine ground run-ups normally require that the aircraft be positioned facing into the wind. At LAX, the predominant wind direction is from west to east, and the proposed blast fence would be positioned to accommodate aircraft engine run-ups in these wind conditions. When UAL aircraft engine ground run-ups are required during conditions where the wind direction is not from west to east, the run-ups would occur at another location at LAX where there is a blast fence available for the non-standard wind conditions.

<sup>7</sup> A triturator is a below-grade automated facility that accepts aircraft lavatory sewage (transported from the aircraft via lavatory vehicles) and conveys the material to the sanitary sewer system.

<sup>8</sup> The existing spray booths at the West Maintenance Facility would be taken out of operation. It is anticipated that the Permit to Operate for the new spray booth at the proposed project site would be structured to reduce allowable paint and solvent usage below current permitted levels.

### 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.

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.<sup>9</sup> 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.<sup>10</sup> Furthermore, state and local regulations may apply to properties listed in the National Register.

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

<sup>9</sup> 36 Code of Federal Regulations (CFR) 60, Section 60.2.

<sup>10</sup> 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 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).

- 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.<sup>11</sup>

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.<sup>12</sup>

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

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.

<sup>11</sup> 36 CFR 60, Section 60.4.

<sup>12</sup> California PRC, Section 5024.1(a).

- 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.<sup>13</sup>

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).
- 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.<sup>14</sup>

#### 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."*

<sup>13</sup> California PRC, Section 5024.1(d).

<sup>14</sup> California PRC, Section 5024.1(e).

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.

### 3.3 Historic Significance and Integrity

#### 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.<sup>15</sup> 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 prehistoric or historic period.”<sup>16</sup> 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.

<sup>15</sup> *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. (4)

<sup>16</sup> *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)

- *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.<sup>17</sup>

### 3.4 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 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.<sup>18</sup>

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.”<sup>19</sup>

In the City of Los Angeles, “there is no requirement that a resource be a certain age before it can be designated”<sup>20</sup> 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.”

### 3.5 Los Angeles International Airport Preservation Plan

A Preservation Plan for LAX<sup>21</sup> was developed in conjunction with environmental review for the LAX Landside Access Modernization Program (LAMP) and included in

<sup>17</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of Interior, 1997. (44, 45)

<sup>18</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of Interior, 1997. (2).

<sup>19</sup> *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)

<sup>20</sup> City of Los Angeles Office of Historic Resources website, accessed November 26, 2017. <https://preservation.lacity.org/commission/frequently-asked-questions-faqs>

<sup>21</sup> “Los Angeles International Airport Preservation Plan,” prepared by Historic Resources Group, September 2016.

As noted in the Preservation Plan:

*“This Preservation Plan for Los Angeles International Airport (LAX) has been developed in order to:*

- *Identify historic resources located on the LAX property;*
- *Ensure that the most important historic resources located on the LAX campus are preserved and their eligibility for listing as historic resources is maintained;*
- *Provide appropriate guidance for the rehabilitation<sup>[22]</sup> of historic buildings, structures, objects and sites located on the LAX campus;*
- *Create an appropriate process for environmental review of future projects with respect to historic resources, including review under the California Environmental Quality Act (CEQA), the National Environmental Protection [sic] Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA);*
- *See to it that all buildings, structures, objects and sites that have been identified as eligible for historic designation but have not been identified for preservation are given the appropriate review, consideration, documentation and/or commemoration prior to any substantial alteration or demolition.*

*The Plan will 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.<sup>23</sup>*

The LAX Preservation Plan identified fourteen (14) resources as individually eligible for designation as historic resources. These include two resources currently located on the project site: two large maintenance bays at 6000-6016 Avion Drive and 6020-6024 Avion Drive (counted together as a single resource) and a Quonset hut. These resources are examined in Section 5.0 of this report.

<sup>22</sup> Rehabilitation is defined by the National Park Service as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.”

<sup>23</sup> Los Angeles International Airport Preservation Plan (4)

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.<sup>24</sup> 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 2000-acre portion of the property was leased to local farmer Andrew B. Bennet. This property became known as the Bennett Rancho, and was used to grow crops.

#### **4.2 Airport Development 1928-1941**

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

In 1928, the Los Angeles Department of Airports (DOA) was established to administer the airport. The airport constructed its first permanent building -- Hangar One -- in 1929 and development continued that year with the construction of administrative offices, a runway, and additional hangars.

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

#### **The War Effort 1942-1944**

The federal government assumed control of the airport in 1942, soon after the Japanese attack on Pearl Harbor. The airport was taken over for military use for the duration of World War II. Activities were focused on the needs of overseas combat

<sup>24</sup> PCR Services Corporation. "LAX Master Plan EIS/EIR: Appendix I, Section 106 Report," January 2001.



operations and production at the aeronautical manufacturing companies located on and around the airport increased dramatically. A detachment from the 4<sup>th</sup> Fighter Command was stationed at the field and a mess hall, officer's quarters, and barracks were built for the Army Air Corps north of Imperial Highway and west of Sepulveda Boulevard. Airport buildings, including on-site or nearby manufacturing facilities now considered crucial to the war effort, were wrapped in camouflage.

During the war, naval gun batteries were constructed along the Pacific Coast as defensive fortifications in case of enemy attack on the mainland. In 1942-1943, a coastal defense battery unit – dubbed the “El Segundo Battery” -- was erected in the coastal dunes west of the airport to protect military operations at the airport. Other improvements were made during this timeframe, including installation of an instrument landing system and extension of the runway.

The Department of Airports created a master development plan for the airport in early 1943, proposing westward expansion of the airfield and construction of new terminals and administration buildings at the north of the airport property along Century Boulevard. Commitments from the major American commercial airlines<sup>25</sup> to relocate to Los Angeles Municipal Airport were secured. Finalized in 1944, the new master plan proposed two phases of development: an initial stage to immediately accommodate commercial operations and a subsequent, long-range expansion to the west.

#### **The “Intermediate Terminal Facility” 1945-1960**

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

Additional office and hangar buildings were constructed by the airlines. By 1947 five major airlines had opened for business at the Los Angeles Municipal Airport. Western Airlines, a pioneering Los Angeles area airline incorporated in 1925, established its national headquarter operations at Los Angeles Airport at 6040 Avion Drive at that time. Western was previously headquartered at Burbank Airport for many years.<sup>26</sup>

Amenities such as newsstands, tobacco shops, a barbershop, a restaurant, medical center, laundry, cocktail bar and lounge, and a garage were added to the Intermediate

<sup>25</sup> United Airlines, TWA, Western Air, American Airlines, and Pan American Airways.

<sup>26</sup> Delta Flight Museum website accessed December 14, 2017.

[www.deltamuseum.org/exhibits/delta-history/family-tree/western-airlines/decades/1920s](http://www.deltamuseum.org/exhibits/delta-history/family-tree/western-airlines/decades/1920s)



Terminal Facility, as needed. The Civil Aeronautics Administration designated Los Angeles' airport an "international-express class" airport after determining its facilities adequate for international, intercontinental, and non-stop domestic flights. By 1947, six major airlines were operating at the airport. Los Angeles Municipal Airport was officially re-named Los Angeles International Airport (LAX) on October 11, 1949.

Los Angeles' postwar economic growth would effectively mandate continued improvements and expansion of the airport. Between 1947 and 1952, the number of travelers using or passing through the airport increased over 50 percent.<sup>27</sup> By 1950, all facilities were operating beyond their capacity. Using airport revenue and some federal funding the airport was able to make several upgrades to the Intermediate Terminal Facility including runway expansions, terminal building expansions, more parking facilities and a 72-foot tall control tower added in 1951. As fully constructed, the Intermediate Terminal Facility included eight major buildings arranged in a J-shaped configuration deeply set back from Century Boulevard. Surface parking lots fronted Century Boulevard with Avion Drive and Airport Boulevard giving access to parking and the Intermediate Terminal Facilities buildings from Century Boulevard.<sup>28</sup>

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

The Central Terminal Area has remained the hub of passenger service activity at LAX since its opening in 1961. Passenger service was phased out at the Intermediate Terminal Facility once the Central Terminal Area became operational. By 1972, only the hangar and maintenance facilities buildings at 6000-6016 Avion Drive (originally constructed for American Airlines), 6020-6024 Avion Drive (originally constructed for United Airlines), and 6040 Avion Drive (originally constructed for Western Airlines), and some small, ancillary buildings remained of the Intermediate Terminal Facility. All other buildings had been razed and largely replaced by air cargo facilities.<sup>29</sup> Western Airlines expanded its corporate headquarters and aircraft maintenance facilities at 6040 Avion Drive in 1963 and 1972. Western Airlines merged with Delta Air Lines in 1986 and the "Western" brand name was discontinued. 6000-6016 Avion Drive

<sup>27</sup> 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)

<sup>28</sup> Historic Aerials by Netronline, accessed November 16, 2017. <https://www.historicaerials.com/viewer>

<sup>29</sup> Historic Aerials by Netronline, accessed November 16, 2017. <https://www.historicaerials.com/viewer>

and 6020-6024 Avion Drive continue to operate as maintenance facilities today;  
6040 Avion Drive is currently a cargo facility.

Individual buildings, structures, objects and site features located within and adjacent to the proposed project site are examined in the following analysis for the purposes of identifying potential historical resources.

Investigation of the project site in development of the LAX Preservation Plan identified two buildings that appear to be historically significant. The two buildings at 6000-6016 Avion Drive and 6020-6024 Avion Drive (counted together as a single resource) appear to be significant for their association with the Intermediate Terminal Facility that operated as Los Angeles Municipal (and later International) Airport from the end of World War II to the opening of the Central Terminal Area in 1961. The Quonset Hut located at 6030 Avion Drive also appears significant as a rare, intact example of a World War II-era Quonset hut building type. As noted previously, LAWA is planning to relocate the Quonset Hut to a different location on the airport; therefore, this resource is not evaluated in this section.<sup>30</sup>

As noted previously, a small number of maintenance and storage sheds are also located on the project site. No important historic associations for these structures has been identified and they have not been found to be historically significant.

Evaluation of the buildings at 6000-6016 Avion Drive and 6020-6024 Avion Drive is provided below.

#### **5.1 Evaluation of Significance: 6000-6016 and 6020-6024 Avion Drive**

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

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

<sup>30</sup> A detailed description of the Quonset hut is provided in the LAX Preservation Plan.

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

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

As noted above, only three buildings remain of the Intermediate Terminal Facility. One of these, the former Western Airlines facility at 6040 Avion Drive, (located west of the project site) has been substantially altered by two large additions and alteration of the primary façade.<sup>31</sup> This building no longer conveys the period during which the Intermediate Terminal Facility was active and is, therefore, not eligible for listing in the National Register or California Register, or for local designation as a City of Los Angeles Historic-Cultural Monument. The two other buildings, 6000-6016 and 6020-6024 Avion Drive (located within the project site), have also both undergone some alteration and do not retain sufficient integrity for listing in the National Register. However, resources lacking sufficient integrity for listing in the National Register may still be eligible for listing in the California Register. Although the two intact, surviving Intermediate Terminal Facility buildings at 6000-6016 and 6020-6024 Avion Drive do not retain sufficient integrity to be eligible for the National Register, both do retain most of their original massing, cladding, fenestration and entrance openings. Therefore, they retain sufficient integrity to be eligible for listing in the California Register and for designation as a City of Los Angeles Historic-Cultural Monument.<sup>32</sup> Together, they are considered two component parts of a single historical resource, significant for its association with the Intermediate Terminal Facility period at LAX.

## **5.2 Summary of Findings**

The project site contains two (2) buildings, the maintenance, office and hangar buildings at 6000-6016 and 6020-6024 Avion Drive, that together are eligible for

<sup>31</sup> City of Los Angeles Building Permit 1963LA43686; City of Los Angeles Building Permit 1973LA68274.

<sup>32</sup> Together, the two buildings represent a single resource.

listing in the California Register and for designation as a City of Los Angeles Historic-Cultural Monument. The project site also contains a Quonset hut at 6030 Avion Drive that is eligible for listing in the National Register and California Register and for designation as a City of Los Angeles Historic-Cultural Monument, and which is planned to be relocated by LAWA independently of the proposed project. No other buildings or structures located on or adjacent to the project site are eligible for historic listing or designation.

A map showing the location of the identified historical resources can be found in Figure 2. Photos of historical resources located on the project site can be found in Appendix B. The findings from the historical resources investigation of the project site are summarized in Appendix C.

Figure 2: Historical Resources within the Project Site



HISTORIC RESOURCES GROUP



### 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.<sup>33</sup> 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.<sup>34</sup>

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 Register of Historical Resources... local register of historical resources... or its identification in an historical resources survey.”<sup>35</sup>

### 6.2 Discussion of Potential Impacts to Historical Resources

As discussed in Section 5 of this report, investigation of the project site identified two (2) buildings at 6000-6016 and 6020-6024 Avion Drive that together appear eligible for listing in the California Register and for designation as a City of Los Angeles Historic-Cultural Monument. The project site also contains a Quonset hut at 6030 Avion Drive that is eligible for listing in the National Register and California Register and for designation as a City of Los Angeles Historic-Cultural Monument. As

<sup>33</sup> *CEQA Guidelines*, section 15064.5(b).

<sup>34</sup> *CEQA Guidelines*, section 15064.5(b)(1).

<sup>35</sup> *CEQA Guidelines*, section 15064.5(b)(2).

previously noted, the Quonset hut is planned for relocation to a different location on the airport by LAWA independent of the proposed project. The Quonset hut would, therefore, not be affected by the proposed project. Potential impacts of the proposed project on the other resources located onsite are examined below.

#### Potential Impacts Related to Demolition

The proposed project would involve demolition of 6000-6016 and 6020-6024 Avion Drive which together have been found eligible for listing in the California Register and for designation as a City of Los Angeles Historic-Cultural Monument. Demolition of 6000-6016 and 6020-6024 Avion Drive 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.

#### Potential Impacts Related to New Construction

As described in the project description in Section 2.0, the proposed project would construct a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet. Because 6000-6016 and 6020-6024 Avion Drive would be demolished as part of the proposed project, and the Quonset hut will be relocated independent of the proposed project, no identified historical resources would remain on the project site or in the near vicinity once new construction for the proposed project commences. Therefore, new construction associated with the proposed project would not impact any historical resources on or adjacent to the project site.

### **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 two buildings at 6000-6016 and 6020-6024 Avion Drive, which together have been found individually eligible for listing in the California Register and for designation 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. (As noted previously, relocation of the Quonset hut is occurring independent of the proposed project.) 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?

No. The project does not involve conversion, rehabilitation, or alteration of a significant resource.



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

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No. As stated above, the project would not involve construction in the near vicinity of any identified historical resources. The two buildings at 6000-6016 and 6020-6024 Avion Drive would be demolished as part of the proposed project and would no longer be extant. The Quonset hut will be relocated independent of the proposed project. No other identified historical resources are located on the project site or in the near vicinity of the project site.

**6.4 Summary of Potential Impacts to Historical Resources**

Analysis of potential impacts concludes that the project would result in significant impacts to historical resources by demolishing 6000-6016 and 6020-6024 Avion Drive, which together have been found eligible for listing in the California Register and for designation 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 6000-6016 and 6020-6024 Avion Drive which together have been found eligible for listing in the California Register and for designation 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."<sup>36</sup> When data recovery is the only feasible mitigation, studies shall be deposited with the California Historical Resources Regional Information Center (CHRIS).

The LAX Preservation Plan specifies the procedures to be followed in the event of demolition of an historical resource. Specifically, demolition of a historic resource will require notification to the City of Los Angeles Department of City Planning's Office of Historic Resources (OHR), including submittal of a documentation plan that fully documents the historic resource prior to demolition. OHR is required to review the documentation plan and submit any written comments within 15 working days from the date the documents are received. LAWA will comply with the procedures outlined in the adopted LAX Preservation Plan. No feasible mitigation measures are available to further reduce the impact to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan. Therefore, impacts to historical resources from project implementation would be significant and unavoidable.

<sup>36</sup> 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](http://ohp.parks.ca.gov/?page_id=21727), accessed May 22, 2017.

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*California Code of Regulations*, (Title 14, Division 6, Chapter 3, Sections 15000-15387).

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



**Intermediate Terminal Facility. 1947**  
Los Angeles Public Library Collection



**Los Angeles International Airport Intermediate Facilities c. 1955**  
Los Angeles Public Library Collection





Los Angeles International Airport Postcard Image c. 1965



**Aerial View of Intermediate Terminal Facility c.1955**  
USC Collections





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



**6020-6024 Avion Drive**

Looking southwest at the north-facing façade.



**6030 Avion Drive**

Looking northeast at the south-facing façade.

APN	ADDRESS	DATE	PROPERTY	STATUS
4129029900	6000-6016 Avion Drive	1947	American Airlines Hangar and Facilities; Intermediate Terminal Facility	Historically significant as one of two remaining intact buildings of the "Intermediate Terminal Facility," constructed between 1945 and 1947.  Eligible for the California Register. Eligible as an HCM.
4129029900	6020-6024 Avion Drive	1947	United Airlines Hangar and Facilities; Intermediate Terminal Facility	Historically significant as one of two remaining intact buildings of the "Intermediate Terminal Facility," constructed between 1945 and 1947.  Eligible for the California Register. Eligible as an HCM.
4129029900	6030 Avion Drive	c. 1943	Quonset hut	Significant as a rare intact example of a World War II-era Quonset Hut.  Eligible for the National Register and California Register. Eligible as an HCM.