

Attachment 2 – Historical Resources Memorandum

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MEMORANDUM

LAX AIRFIELD AND TERMINAL MODERNIZATION PROJECT PROPOSED ROADWAY MODIFICATIONS DECEMBER 2024

1. OVERVIEW

This memorandum analyzes proposed changes to the roadway modifications associated with the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project or ATMP (the approved Project) for potential impacts to historical resources. Potential impacts to historical resources associated with the approved Project were previously analyzed in the 2020 Historical Resources Technical Report and Environmental Impact Report (collectively referred to as the EIR).

The approved Project would implement airfield, terminal, and landside roadway improvements at LAX. This memorandum analyzes proposed modifications to the roadway improvements in the approved Project (roadway modifications) and their potential impacts to historical resources.¹

The EIR analysis determined that the approved Project would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project Site Vicinity. Therefore, the approved Project's impact on historical resources was determined to be less than significant as defined by CEQA.

The roadway modifications represent changes to the locations and size of some of the roads and access ramps associated with the approved Project. This memorandum examines the potential impacts of these modifications and determines that the roadway modifications, like

¹ As discussed in Section 4.1 of the Addendum to the LAX ATMP EIR, the Initial Study (Appendix A of the EIR) concluded that the approved Project would have less than significant impacts to archaeological resources because these resources are not known to be present in or near the Project area, and construction would be conducted in accordance with the Los Angeles World Airports' (LAWA's) Archaeological Treatment Plan. The proposed roadway modifications would not alter this conclusion. As such, this memorandum does not include an analysis of potential impacts to archaeological resources.

the roadway improvements defined in the approved Project, would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project Site Vicinity. Therefore, impacts on historical resources associated with the roadway modifications would be less than significant as defined by CEQA.

Analysis was performed by Paul Travis, AICP, Managing Principal. Paul is a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards.

2. HISTORICAL RESOURCE IDENTIFICATION

As detailed in the EIR, the approved Project area contains four (4) properties that have been identified as eligible for historic listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and/or as a City of Los Angeles Historic-Cultural Monument (Figure 1). These include the original (1961) Airport Traffic Control Tower (or "ATCT") at the eastern end of the Central Terminal Area (CTA); the former McCulloch Building (now H Hotel/Homewood Suites) at 6151 W. Century Boulevard; the former Union Savings and Loan building at 9800 S. Sepulveda Boulevard; and the former Aircraft School Building at 9700 S. Sepulveda Boulevard. All are considered historical resources herein for the purposes of CEQA.

3. ROADWAY MODIFICATIONS

LAWA in collaboration with the Design-Build contractor Skanska Flatiron Joint Venture (SFJV) has considered various enhancements to the approved EIR roadway design as the result of the detailed engineering design and planning that has been undertaken since the 2021 certification of the EIR. Some of the key enhancements include elimination of the originally-proposed signals at the intersection of Sepulveda Blvd. and 96th Street to emulate the existing free flow traffic conditions on Sepulveda Blvd. at this intersection. Pedestrian safety is being enhanced by adding two pedestrian overcrossing bridges. Other minor enhancements include realignment of various ramps to avoid constraints. Figure 2 illustrates the location of the historical resources with respect to the proposed modified roadways.

4. ANALYSIS OF POTENTIAL IMPACTS

Discussion of Potential Impacts to the 1961 ATCT

As detailed in the EIR, the 1961 ATCT was identified as eligible for listing as a City of Los Angeles Historic-Cultural Monument and is, therefore, considered a historical resource herein for the purposes of CEQA. A discussion of the elements of the approved Project in closest proximity to the 1961 ATCT in the EIR included "modifications to the roadways that provide ingress to and egress from the CTA."

As described in the EIR analysis, "the roadways that currently encircle the 1961 Administration Building, the closest of which is located approximately 130 feet from the ATCT, would be modified and nearby roadways would be demolished." None of the Project-related improvements would require demolition or alteration of the 1961 ATCT. The 1961 ATCT would retain all of its remaining original features, including its square plan, 13 story height, and flat roof; control cab with angled, continuous, fixed aluminum-framed ribbon windows and surrounding roof deck; scored cement plaster spandrels; continuous aluminum grates; exposed

concrete *piloti*, elevator/stair shaft, and screen wall at ground floor. The 1961 ATCT would remain in its original location at the eastern entry to the CTA and retain its historic axial relationship with the Theme Building. The Tower would remain substantially taller than the grade-separated ramps and roadways associated with the landside improvements.

As was true in the analysis of the approved Project, modifications to the roadways that provide ingress to and egress from the CTA would not affect the integrity of *location, design, materials, or workmanship* of the 1961 ATCT. The building would remain intact in its current location and would not be materially altered by the roadway modifications. Because the 1961 ATCT would retain integrity of *location, design, materials, and workmanship*, it would continue to reflect its historic significance. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the 1961 ATCT would continue to convey its historic significance as the original “Jet Age” airport traffic control tower for LAX. Therefore, integrity of *association* would also remain unaffected. As was true with the approved Project, the only aspect of integrity that could potentially be affected by the roadway modifications is *setting*. Because roadway improvements in the near vicinity of the 1961 ATCT would be introduced, its immediate surroundings would be altered.

As discussed in the EIR, the immediate surroundings of the 1961 ATCT have undergone numerous major and minor alterations since both the initial completion of the CTA in 1962 and its transformation since 1981.

As was explained in the EIR analysis, the larger setting is not critical to understanding the historic significance of the 1961 ATCT because its immediate surroundings have been substantially altered since its original construction and the alteration and new construction associated with the approved Project would not be substantially different from previous changes and alterations. Nearby roadway modifications only slightly different than those of the approved Project would not change that conclusion. For these reasons, all of the relevant aspects of integrity would be unaffected by the roadway modifications, so that the historic integrity of the 1961 ATCT would be retained. Like the approved Project, the roadway modifications analyzed here would alter the larger surroundings of the 1961 ATCT, but this alteration would not materially impair the building such that it can no longer convey its historic significance.

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

Discussion of Potential Impacts to 9800 S. Sepulveda Boulevard

As noted in the EIR, the former Union Savings and Loan Building at 9800 S. Sepulveda Boulevard was identified as eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument and is, therefore, considered a historical resource for the purposes of CEQA. The Union Savings and Loan Building was found significant as an example

of the New Formalist architectural style as applied to a bank building, and as a representative example of the work of master architects Welton Beckett & Associates.

Discussion of the elements of the approved Project in closest proximity to the Union Savings and Loan Building in the EIR included "new elevated roadways north of the Union Savings and Loan Building on the northern side of 98th Street and on the western side of Sepulveda Boulevard across the street from the building, providing access from the CTA to southbound Sepulveda Boulevard." The roadway modifications analyzed in this memorandum do not substantially differ from the approved Project at the location of the former Union Savings and Loan Building.

As was true with the approved Project, the roadway modifications would not require demolition or alteration of the Union Savings and Loan Building. The Union Savings and Loan Building would retain all of its character-defining features, including its tripartite composition of base, middle and top, ground floor shallow arcade, horizontal bands of arched, fixed windows, overhanging perforated soffit at the roofline, and pre-cast concrete panel cladding.

Similar to the roadway modifications described in the approved Project, modified elevated roadways would align with Sepulveda Boulevard immediately west of the Union Savings and Loan Building, crossing Sepulveda Boulevard at 98th Street and continuing east on 98th Street, partially obscuring views of the north and west façades. The heights of the elevated roadways in the vicinity of the Union Savings and Loan Building would be similar under both the approved Project and with the proposed roadway modifications. At 8 stories, the Union Savings and Loan Building would be over three times the height of the elevated roadways and all of its public-facing façades would remain discernible despite partial blocking of views from the west and north. After construction of the modified elevated roadways, the Union Savings and Loan Building would remain intact and continue to convey its historic significance. Construction of the modified elevated roadways would not result in a significant impact to the Union Savings and Loan Building.

Like the approved Project, the roadway modifications would not affect the integrity of *location*, *design*, *materials*, or *workmanship* of the Union Savings and Loan Building. The building would remain intact in its current location and would not be materially altered by new construction associated with the roadway modifications. Because the Union Savings and Loan Building would retain integrity of *location*, *design*, *materials*, and *workmanship*, it would continue to reflect its historic significance as a New Formalist commercial office building. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Union Savings and Loan Building would remain. Therefore, integrity of *association* would also remain unaffected. The only aspect of integrity that could potentially be affected is *setting*. Because the roadway modifications would introduce elevated roadway improvements in the near vicinity of the Union Savings and Loan Building, its immediate surroundings would be altered.

As explained in the EIR, the immediate surroundings of the Union Savings and Loan Building, however, have undergone numerous alterations since its original construction as new buildings were constructed and surrounding existing buildings were demolished to make way for surface parking lots. The larger setting is not critical to understanding the historic significance of the

Union Savings and Loan Building because its immediate surroundings have been substantially altered since its original construction and the alteration and new construction associated with the roadway modifications would not be substantially different from previous changes and alterations. For these reasons, all of the relevant aspects of integrity would be unaffected, so that the historic integrity of the Union Savings and Loan Building would be retained. While the roadway modifications would alter the larger surroundings of the Union Savings and Loan Building, this alteration would not materially impair the building such that it can no longer convey its historic significance.

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

Discussion of Potential Impacts to 9700 S. Sepulveda Boulevard

As detailed in the EIR, the former Aircraft School Building at 9700 S. Sepulveda Boulevard was identified as eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument. The former Aircraft School Building was found significant as a rare intact example of an aircraft training facility from the early 1940s, representative of the 20th century development of aircraft- and aerospace-related industries and services that clustered near the airport beginning with the establishment of Mines Field.

The EIR identified “new elevated roadways on the north side of 98th Street providing access from Sepulveda Boulevard into the CTA” as one of the elements of the approved Project in closest proximity to the former Aircraft School Building. As defined by the approved Project, these elevated roadways would be located approximately 327 feet east, approximately 45 feet west, and approximately 65 feet south of the former Aircraft School Building. The roadway modifications would place elevated roadways differently in relation to the former Aircraft School Building. Elevated roadways with the proposed roadway modifications would be closer to the former Aircraft School Building than under the approved Project (approximately 38 feet to the south as compared to 65 feet, and approximately 90 feet to the east as compared to 327 feet), although the proposed roadway improvements to the west would be farther from the former Aircraft School Building (approximately 70 feet west as compared to 45 feet). The heights of the elevated roadways in the vicinity of the former Aircraft School Building would be similar under both the approved Project and with the proposed roadway modifications.

As was true for the approved Project, modifications to the elevated roadways would not require demolition or alteration of the former Aircraft School Building. The former Aircraft School Building would retain all of its character-defining features, including its bow-truss roof and monitor, horizontal wood cladding, and metal-frame, multi-light casement windows.

The elevated roadways shown in the approved Project would align with Sepulveda Boulevard immediately west of the former Aircraft School Building, crossing Sepulveda Boulevard at 98th Street and continuing east along 98th Street, partially encroaching on the existing property line. Another roadway would parallel Sepulveda Boulevard immediately west of the former Aircraft

School Building and turning to the east to the south of 96th Street. This proposed roadway segment would be at-grade as an exit from northbound Sepulveda Boulevard to access the new roadway system into the Central Terminal Area.

The modified elevated roadways would follow the same general path but would approach the Aircraft School Building property from the northeast and cross southwest toward 98th Street. In doing so, the modified elevated roadways encroach much closer to the Aircraft School Building to the south and east when compared to the approved Project.

Analysis of the approved Project in the EIR determined that the elevated roadways would obscure views of the south façade when viewed from 98th Street. The modified elevated roadways would also obscure views of the Aircraft School Building from the south as well as from the east where the elevated roadways would encroach closer to the building. While the modified elevated roadway structures would obscure views of the former Aircraft School Building, it would still be discernible from multiple vantage points. Moreover, the former Aircraft School Building is set back deeply from 96th Street, 98th Street, and Vicksburg Avenue. As noted in the EIR, the building is not a high-profile presence when viewed from any of the surrounding streets.

Like the approved Project, the roadway modifications would not affect the integrity of *location, design, materials, or workmanship* of the former Aircraft School Building. The building would remain intact in its current location and would not be materially altered by new construction associated with the roadway modifications. Because the former Aircraft School Building would retain integrity of *location, design, materials, and workmanship*, it would continue to reflect its historic significance. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the former Aircraft School Building would remain. Therefore, integrity of *association* would also remain unaffected by the roadway modifications. The only aspect of integrity that could potentially be affected by the roadway modifications is *setting*. Similar to the approved Project, the roadway modifications would introduce elevated roadways in the near vicinity of the former Aircraft School Building and its immediate surroundings would be altered.

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

Because the roadway modifications would not result in physical alteration of the structure and materials of the former Aircraft School Building, it would remain eligible for listing in the

National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument. The character-defining features and form of the former Aircraft School Building would remain intact, and the building would continue to convey its historic significance. Therefore, the roadway modifications would not result in significant impacts to the former Aircraft School Building.

Discussion of Potential Impacts to 6151 W. Century Boulevard

As noted in the EIR, the former McCulloch Building at 6151 W. Century Boulevard was identified as eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument and is, therefore, considered a historical resource for the purposes of CEQA. The McCulloch Building was found significant as an excellent example of Corporate International architecture and the work of significant architects Welton Beckett & Associates. In recent years the McCulloch Building has been altered through renovations associated with its conversion to the H Hotel/Homewood Suites. The building's eligibility was not reevaluated following its conversion to a hotel use in 2017. This analysis assumes that the McCulloch Building still retains its historic significance.

The EIR discussion of the elements of the approved Project in closest proximity to the McCulloch Building included "improvements to nearby roadways" and "new elevated roadways to the east of the McCulloch Building along the future "A" Street [since renamed Jetway Boulevard], which will be perpendicular to Century Boulevard between Vicksburg Avenue and Avion Drive, providing access from Sepulveda Boulevard into the CTA." The roadway modifications analyzed in this memorandum do not substantially differ from the approved Project immediately east of the McCulloch Building.

As was true with the approved Project, the roadway modifications would not require demolition or alteration of the McCulloch Building. The McCulloch Building would retain all of its character-defining features, including its rectangular plan, flat roof, exterior walls articulated with alternating bands of recessed metal-frame windows and concrete spandrel panels, and ground floor recessed behind *pilotis*.

Similar to the roadway modifications described in the approved Project, modified elevated roadways would be adjacent to the McCulloch Building to the south and east, partially obscuring views of the south and east façades. The heights of the modified elevated roadways would be similar to that for approved Project; only the horizontal geometry has been modified through further engineering. At 12 stories, however, the McCulloch Building would be over four times the height of the elevated roadways and all of its public-facing façades would remain discernible despite partial blocking of views by the elevated roadways. After construction of the elevated roads, the McCulloch Building would remain intact and continue to convey its historic significance. Construction of the modified elevated roadways would not result in a significant impact to the McCulloch Building.

Like the approved Project, the roadway modifications would not affect the integrity of *location, design, materials, or workmanship* of the McCulloch Building. The building would remain intact in its current location and would not be materially altered by new construction associated with the roadway modifications. Because the McCulloch Building would retain integrity of *location, design, materials, and workmanship*, it would continue to reflect its historic significance as a

Corporate International commercial office building. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the McCulloch Building would remain. Therefore, integrity of *association* would also remain unaffected. The only aspect of integrity that could potentially be affected is *setting*. Because the approved Project and the roadway modifications would introduce a new concourse and elevated roadway improvements in the near vicinity of the McCulloch Building, its immediate surroundings would be altered.

As explained in the EIR, the immediate surroundings of the McCulloch Building have undergone numerous alterations since its original construction as new buildings were constructed and surrounding existing buildings were demolished to make way for surface parking lots. The larger setting is not critical to understanding the historic significance of the McCulloch Building because its immediate surroundings have been substantially altered since its original construction. For these reasons, all of the relevant aspects of integrity would be unaffected by the roadway modifications, so that the historic integrity of the McCulloch Building would be retained. While the roadway modifications would alter the larger surroundings of the McCulloch Building, this alteration would not materially impair the building such that it can no longer convey its historic significance.

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

CONCLUSIONS

Analysis of potential impacts concludes that the roadway modifications would not result in significant impacts to any historical resource located on or in the near vicinity of the roadway modifications. Like the approved Project, the roadway modifications would not result in significant impacts to historical resources as defined by CEQA.



