



*Los Angeles
World Airports*

RESOLUTION NO. 26548

BE IT RESOLVED that the Board of Airport Commissioners approved a Terminal Facilities Lease and License Agreement with American Airlines, Inc. for space in Terminals 4 and 5 at Los Angeles International Airport, as referenced in the Board-adopted staff report attached hereto and made part hereof; and

LAX

Van Nuys

City of Los Angeles

Eric Garcetti
Mayor

**Board of Airport
Commissioners**

Sean O. Burton
President

Valeria C. Velasco
Vice President

Jeffery J. Daar
Gabriel L. Eshaghian
Beatrice C. Hsu
Thomas S. Sayles
Dr. Cynthia A. Telles

Deborah Flint
Chief Executive Officer

BE IT FURTHER RESOLVED that the Board of Airport Commissioners authorized the Chief Executive Officer, or designee, to execute said Terminal Facilities Lease and License Agreement with American Airlines, Inc. after approval as to form by the City Attorney and approval by the Los Angeles City Council; and

BE IT FURTHER RESOLVED that the Board of Airport Commissioners approved appropriation of [i] \$191,000,000 for redemption of bonds held by American Airlines, Inc., [ii] \$38,500,000 for purchase of Terminal 4 additional assets, [iii] \$214,000,000 for purchase of airline renovations, and [iv] \$107,000,000 for issuance of rent credits in equal installments for terminal renovations including interest during construction and over the term of the Lease; and

BE IT FURTHER RESOLVED that issuance of permits, leases, agreements, gate and space assignments, and renewals, amendments or extensions thereof, or other entitlements granting use of existing airport facilities involving negligible or no expansion of use and/or alternation or modification of the facilities or its operations beyond that previously existing or permitted is categorically exempt from California Environmental Quality Act (CEQA) requirements pursuant to Article III Class1(18)(c) of the Los Angeles City CEQA Guidelines; and any activity (approval of bids, execution of contracts, allocation of funds, etc.) for which the underlying project has previously been evaluated for environmental significance and processed according to the requirements of CEQA is exempt from further review pursuant to Article II Section 2(i) of the Los Angeles City CEQA Guidelines; and

BE IT FURTHER RESOLVED that actions taken on this item by the Board of Airport Commissioners will become final pursuant to the provisions of Los Angeles City Charter Section 606.

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I hereby certify that this Resolution No. 26548 is true and correct, as adopted by the Board of Airport Commissioners at its Special Session held on Wednesday, July 11, 2018.

Grace Miguel – Secretary
BOARD OF AIRPORT COMMISSIONERS







Los Angeles World Airports

Item Number
16

REPORT TO THE BOARD OF AIRPORT COMMISSIONERS

Approved by:  Dave Jones – Airport Property and Concession Services

Reviewed by:  Samson Mengistu – Chief Operating Officer


City Attorney


Deborah Flint – Chief Executive Officer

Meeting Date:

7/11/2018

CAO Review:

☐ Completed
☐ Pending
☐ N/A

Reviewed for	Date	Approval Status	By
Finance	7/5/2018	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	NEO
CEQA	6/25/2018	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	JH
Procurement	6/25/2018	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> Cond	MT
Guest Experience	6/22/2018	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	BY
Strategic Planning	6/25/2018	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA	KV

SUBJECT: Terminal Facilities Lease and License Agreement with American Airlines, Inc. for space in Terminals 4 and 5 at Los Angeles International Airport

Approve a Terminal Facilities Lease and License Agreement with American Airlines, Inc. for space in Terminals 4 and 5 at Los Angeles International Airport which will generate approximately \$81,000,000 in revenue the first year and an estimated \$2.25 Billion over the term.

RECOMMENDATIONS:

Management RECOMMENDS that the Board of Airport Commissioners:

1. ADOPT the Staff Report.
2. DETERMINE that this action is exempt from the California Environmental Quality Act (CEQA) pursuant to Article III, Class 1 (18)(c) and Article II, Section 2.i of the Los Angeles City CEQA Guidelines.
3. APPROVE the proposed Terminal Facilities Lease and License Agreement with American Airlines Inc., for space in Terminals 4 and 5 at Los Angeles International Airport.
4. AUTHORIZE the Chief Executive Officer or her designee to execute the Terminal Facilities Lease and License Agreement with American Airlines, Inc. for space in Terminals 4 and 5 at

Los Angeles International Airport subject to approval as to form by the City Attorney and upon approval by the Los Angeles City Council.

5. APPROPRIATE funds in the amount of \$191,000,000 for the redemption of bonds held by American Airlines, Inc.; \$38,500,000 to purchase T4 Additional Assets; \$214,000,000 to purchase Airline Renovations; and, \$107,000,000 to issue rent credits in equal installments for Terminal Renovations including interest during construction and over the term of the proposed Lease.

DISCUSSION:

1. Purpose

Enable American Airlines, Inc. (American) to renovate its existing premises and adjacent areas at Terminals 4 and 5 at Los Angeles International Airport (LAX) to incorporate construction of a Terminal Vertical Core (TVC) to connect the terminals to the Automated People Mover (APM) and to provide the potential for future improvements.

2. Prior Related Actions

- July 25, 1984 – Board Order No. AO-3689
The Board of Airport Commissioners (Board) approved a forty-year Terminal Facilities Lease (LAA-4687) with American for space at Terminal 4 at LAX, and to allow American to finance certain improvements to Terminal 4.
- July 14, 1998 – Resolution No. 20306
The Board approved construction reimbursements through rental credits (LAA-7941) for Fire-Life-Safety, Heating Ventilation and Air Conditioning (HVAC), and Electrical Power Upgrades in Terminal 4.
- February 1, 2000 – Resolution No. 20916
The Board approved construction reimbursements through rental credits for Telecommunications Upgrades in Terminal 4.
- October 23, 2001 – Resolution No. 21569
The Board approved a modification to the payment methodology (rental credits) and construction reimbursements for Fire-Life-Safety (LAA-7941-1), Heating Ventilation and Air Conditioning (HVAC) (LAA-7941-2), Electrical Power Upgrades (LAA-7941-3), and Telecommunications Upgrades (LAA-7941-4) in Terminal 4.
- November 13, 2001 -- Board Order No. AO-4793
The Board approved the First Amendment to the Lease (LAA-4687A) to update the demised premises upon completion of new improvements, set rental rates, and allow American to finance certain improvements to Terminal 4.
- June 22, 2009 – Board Resolution No. 23847
The Board approved a Gates and Operations Agreement (LAA-8490) with American providing for certain rights regarding gate utilization, facilities and credits for busing costs at LAX.

- March 21, 2011 – Board Resolution No. 24417
The Board approved a Reimbursement Agreement (DA-4608) with American for design costs associated with the Security Program Baggage Screening System Project in Terminal 4 at LAX.
- September 17, 2013 – Board Resolution No. 25242
The Board approved a Reimbursement Agreement (DA-4861) with American for design and construction costs associated with the Checked Baggage Inspection System (CBIS) Project in Terminal 4 at LAX.
- July 15, 2015 – Board Resolution No. 25613
The Board approved a Sublease under Lease LAA-4687 with American to provide access to certain spaces needed to construct the Terminal 4 – TBIT Connector and to provide additional concession space in Terminal 4.
- June 16, 2016 – Board Resolution No. 26003
The Board approved a First Amendment to Sublease with American to provide additional concession space and space for a lactation room in Terminal 4.
- June 16, 2016 – Board Resolution No. 26010
The Board approved a Terminal Facilities Lease and License Agreement (LAA-8936) with American covering space in the Terminal 4 Connector and in Terminal 4 to provide American the space to install the new inline CBIS.

3. Current Action

The proposed new Terminal Facilities Lease and License Agreement (Lease) will terminate American's current terminal lease, which is the last remaining legacy terminal lease, and combine American's terminal occupancy agreements into a single lease agreement. Execution of the proposed Lease will complete the transition of all terminal occupancy agreements to terms consistent with the current LAX Terminal Rate Methodology, gate use language, and standard lease provisions. In addition, the proposed Lease will enable American to make renovations to Terminals 4 and 5, subject to appropriate approvals, which Los Angeles World Airports (LAWA) may acquire upon Board approval of funding appropriations.

Terminal Construction Projects

Over the past ten years, numerous tenants, including Delta Air Lines, Alaska Airlines, American Airlines, Southwest Airlines, United Airlines, and Westfield Concessions Management have managed renovations in their respective occupied areas to improve the guest experience at LAX. Upon completion of these tenant projects, subject to Board approval, LAWA has acquired certain non-proprietary improvements from these tenants and leased the improved facilities to LAX terminal tenants. Simultaneously, LAWA has constructed new facilities including the new concourses at the Tom Bradley International Terminal (TBIT) and implemented renovations to public areas in other terminals. This approach has allowed implementation of multiple large-scale projects while minimizing

airport operational impacts and LAWA's exposure to construction risk.

In addition to the terminal renovations, LAWA has commenced a comprehensive landside improvement program consisting of an APM and a consolidated rental car (ConRAC) facility. The APM will connect guests between intermodal transportation facilities, the ConRAC, and the terminal facilities. Pedestrian bridges will connect the APM to the terminals, which requires the installation of new TVCs to provide circulation between the multiple levels in the terminal facilities. The TVCs will include elevators, escalators, and stairs to provide guest access to/from arrivals, ticketing, security screening checkpoints, boarding gates, and the APM. LAWA has approved projects to construct all TVCs except for the location between Terminals 4 and 5 contemplated in this proposed Lease.

Proposed Terminal 4 and 5 Improvements:

All terminals at LAX, except Terminal 4, have been or are currently being renovated. To provide Terminals 4 and 5 connectivity to the APM, American has worked closely with LAWA staff to develop concepts for an initial project (the Minimum Improvement Requirement) to renovate their existing premises and adjacent areas to incorporate a TVC in the headhouse areas of Terminals 4 and 5. In addition, American is considering future renovations within its demised premises to improve operations and the guest experience. The proposed Lease provides the option for American to propose future Definitive Terminal Improvement Projects (DTIP), subject to any applicable environmental review requirements of CEQA and/or the National Environmental Policy Act (NEPA) and such separate and independent project or project components as are approved by the Board.

Improvement objectives for the proposed Lease with American include:

Minimum Improvement Requirement

- Construction of new TVC
- Reconfigure and relocate ticket counters, airline ticket offices, baggage handling equipment, bag service offices, and other required work
- Re-gauge Terminal 5 gates to maintain two Aircraft Design Group III gates during construction and installation of common use Bus Port

LAWA will purchase non-proprietary airline components of these projects and issue rent credits for other associated projects with the funding appropriations requested in this Board report.

Future DTIP

- Potential future renovations to improve guest experience in the terminals, including guest processing and connectivity between Terminals 4, 5 and TBIT.

The proposed Lease does not include approval of any future DTIP improvements. Any potential future DTIP improvements that American may submit as contemplated in the proposed Lease would be subject to future environmental review pursuant to CEQA and/or NEPA and future funding requests.

Proposed Lease Terms:

Key components of the proposed Terminal 4 and 5 Lease include:

Term:

The proposed Lease will commence on the first day of the month following Board and Los Angeles City Council approval and terminate on April 30, 2039, unless terminated subject to the following early termination provisions.

- Option to Purchase Non-Proprietary Terminal Renovations – If the Board approves an option to purchase all renovations in a future action with cash rather than rent credits, the Lease will terminate on December 31, 2032.
- Rate Agreement – LAWA will have the option to terminate the Lease on the expiration date of the Rate Agreement, which currently is December 31, 2022, by providing 180-day advance written notice and reimbursing American the undepreciated value of its Proprietary Improvements if LAWA has offered American a Rate Agreement extension that American does not execute.
- LAMP Core – If American does not complete the TVC within 90 days of the Core Deadline of December 31, 2021 or the date by which American's delay in completing the Core causes delays in the construction of the pedestrian bridge, the Lease will terminate on December 4, 2024.
- Term Investment Threshold – If American does not make an investment of at least \$1.0 Billion by December 31, 2026, the term will reduce in proportion to the amount of investment that American failed to make. However, if American submits definitive terminal improvement plans and LAWA does not approve such plans, then the Lease will terminate on December 4, 2028.
- Remote Regional Terminal – If as result of circumstances within its control, American does not move its regional flights to the gates provided for this activity, then, the Lease will terminate on the later of the required move deadline or December 31, 2024.
- Superbay Hangar – If as a result of circumstances within its control, American does not vacate its Superbay Hangar upon an agreed upon date, then the Lease will terminate on the later of the agreed upon date or December 31, 2024.

Bond Redemption

American's existing Lease (LAA-4687), as amended, is a legacy 40-year terminal lease that commenced in 1984 and enabled American to obtain tax-exempt bond financing from the Regional Airports Improvement Corporation (RAIC) to construct certain improvements to Terminal 4. In 1984, these improvements included constructing a connector between the ticketing building and the satellite building, a pedestrian bridge between the ticketing building and Parking Structure 4, and other renovation and remodeling within Terminal 4. In 2001, through an amendment to Lease LAA-4687, American financed additional improvements to Terminal 4, which included adding a new Federal Inspection Services (FIS) facility, additional concession areas and updating the

ticketing lobby and other public areas. The 40-year lease term is subject to earlier expiration concurrent with the early repayment of the bond financing. The repayment of outstanding bonds, including transaction fees will not exceed \$191,000,000. Upon defeasance of the outstanding bonds, lease LAA-4687, as amended, will expire.

Other Agreements:

The Terminal 4 Connector Lease (LAA-8936) will terminate on commencement of the proposed Lease, while the Terminal 4 lease (LAA-4687), sublease agreements and reimbursement agreements under LAA-4687, and the Gate & Operations Agreement (LAA-8490) will terminate on the Terminal 4 Bond Defeasance Date.

Premises:

- Lease Commencement: Upon Lease commencement date, American will occupy airline space consisting of approximately 89,000 square feet.
- Bond Defeasance: Upon the AA bond defeasance date, American will occupy additional airline space consisting of approximately 286,000 square feet in Terminal 4.
- Terminal 5 Additional Premises: Upon certain conditions being met, including the potential of eight widebody gates becoming operational at LAX beyond those contemplated in the Midfield Satellite Concourse currently under construction, American will occupy additional space consisting of approximately 40,000 additional square feet in Terminal 5.

Following completion of the terminal renovation program, the premises will be revised to reflect as-built conditions through revision of the proposed Lease premises exhibits, subject to City Attorney approval as to form, and approval by the Chief Executive Officer, Board, or City Council as required.

Rent:

American has entered into a Rate Agreement with LAWA covering terminal rents at LAX. American's rent will be adjusted pursuant to the terms and conditions of the Rate Agreement while the Rate Agreement is in effect. The Lease will terminate if American does not execute an extension to the Rate Agreement or a replacement Rate Agreement if offered by LAWA.

Proposed Asset Acquisitions:

- Terminal 4 Additional Assets - On the Bond Redemption Date, LAWA will acquire previously installed non-proprietary improvements in an amount not to exceed \$38,500,000.
- Minimum Improvement Requirement - LAWA will acquire the Minimum Investment Requirement projects contemplated in the proposed Lease at actual costs, in an amount not to exceed \$285,000,000 including interest during construction. The Minimum Improvement Requirement is categorized as follows:

Airline Renovations non-proprietary improvements to Terminals 4 and 5 that are usable by any airline operating in these facilities and located in parts of terminals

classified as “airline areas”, including a proportionate share of building improvements allocated to “airline areas” of the terminal. LAWA will purchase these improvements upon completion.

Terminal Renovations include improvements allocated to the public areas of Terminals 4 and 5 that are being implemented during the course of the overall project. LAWA will issue rent credits for these components, unless the Board subsequently approves using cash instead.

American Proprietary Improvements include branded improvements unique to American’s operational needs, and specialty lighting, finishes or other architectural elements specifically selected by American. LAWA does not acquire any proprietary improvements.

The Minimum Improvement Requirement cost are shown in the table below. LAWA will acquire the Airline Renovations upon completion at a cost not to exceed \$214,000,000. In addition, LAWA will issue rent credits in equal installments over the remaining term of the proposed Lease for the Terminal unless the Board subsequently approves exercising the option to make a lump sum payment instead. The cost for the Terminal Improvements will not to exceed \$107,000,000 (\$71,000,000 renovations plus approximately \$36,000,000 of additional interest that will accrue as rent credits are applied over the remaining term).

Minimum Improvement Requirement

Component	Cost	Add'l Interest	Rent Credit Cost
Airline	\$ 214,000,000		
Terminal	\$ 71,000,000	\$ 36,000,000	\$ 107,000,000
Total	\$ 285,000,000		\$ 321,000,000

- Potential Future Projects - In addition to the Minimum Improvement Requirement, American may submit DTIPs for potential additional improvements in order to secure the full Lease term. Staff will return to the Board for authority to acquire any additional improvements requested in future DTIP(s) that American may submit.

CEQA/NEPA Review – Nothing in the Lease constitutes approval of any potential future project contemplated in the DTIP. Prior to the approval and initiation of construction of any potential future improvements, the proposed development program would undergo appropriate environmental review pursuant to CEQA and/or NEPA, recognizing that any significant impacts to environment identified in the review process may require changes to the potential future improvements and/or implementation of feasible mitigation measures, which would be applied as conditions of approval for the development program, and may also require consideration of feasible alternatives to the development program that could avoid or substantially reduce those significant impacts. Upon completion of any review required by CEQA and/or NEPA, the Board would have the option of approving or denying the potential future improvements.

LAWA's total costs for renovations and bond repayment anticipated in the Lease will not exceed \$1,615,000,000 as shown in the table below.

<u>Acquisition Component</u>	<u>Cost</u>
T4 Bond Repayment	\$ 191,000,000
T4 Additional Assets	\$ 38,500,000
Minimum Improvement Requirement	\$ 285,000,000
Potential Future Projects (DTIP)	\$ 1,100,500,000
Total	\$ 1,615,000,000

Preferential Gates and Gate Use:

Consistent with current conditions, American will initially have 15 Preferential-Use Gates in Terminal 4 and four Preferential-Use Gates in Terminal 5. American will receive one additional Preferential-Use Gates in T5 upon completion of gate re-gauge work and common-use bus gate, and up to five additional gates on the Terminal 5 Additional Premises date.

In addition, American may earn additional Preferential-Use Gates in TBIT. American may request that LAWA convert Gate 151 in the Tom Bradley International Terminal to a Preferential Use Gate if they agree to host a narrow body international carrier. Further, after at least 10 gates in the Midfield Satellite Concourse are operational, American may request up to three Aircraft Design Group V Common-Use Gates in TBIT be converted to Preferential-Use Gates subject to American fully utilizing all assigned Preferential-Use Gates. If American presents a schedule that demonstrates enplaning passengers using assigned TBIT gates will be processed in Terminal 4 and LAWA determines American's proposed use will result in each assigned gate processing at least 125% of current use, then LAWA will assign the gates to American.

All Preferential Use Gates will be subject to minimum utilization requirements as defined in the Lease.

How this action advances a specific strategic plan goal and objective

This action advances this strategic goal and objective: Deliver Facilities & Guest Experiences that are Exceptional: Develop, maintain and operate first class facilities. Enabling American to make renovations to the terminals including installation of a TVC to connect with the APM and providing the potential for future improvements to Terminal 4, will improve the guest experience at LAX.

Action Requested

Staff requests the Board approve and authorize the Chief Executive Officer to execute the proposed Lease, subject to approval as to form by the City Attorney and upon approval by the Los Angeles City Council and appropriate funds in the amount of \$191,000,000 to redeem T4 Bonds, \$38,500,000 to acquire T4 Additional Assets, \$214,000,000 to acquire Terminal Airline Renovations and \$107,000,000 to issue rent credits over the remaining term for Terminal Renovations.

Fiscal Impact

The acquisition cost for the planned improvements from American will be recovered through future terminal rates and charges pursuant to the Rate Agreement.

LAWA's total acquisition cost for non-proprietary improvements for the T4 Additional Assets, Terminal 4 Bond repayment the Minimum Investment Requirement, including interest during construction, is capped at \$550,500,000 as follows:

- \$38,500,000 - future payment for Terminal 4 Additional Assets
- \$191,000,000 - future payments for Terminal 4 Bond Defeasance
- \$214,000,000 - future payment for Airline Renovations (75% of Minimum Improvement Requirement)
- \$107,000,000 - future issuance of rent credits for Terminal Renovations (25% of Minimum Improvement Requirement) including interest cost if rent credits are not extinguished by future Board action pursuant to Section 2.2.3(d) of the proposed Lease

LAWA will also incur costs for inspection and project support (utility and area shut-downs, coordination/logistics, etc.) related to the future Airline and Terminal Renovations. These costs are estimated at approximately \$8,000,000, or 2.5% of the total of Airline and Terminal acquisitions. Approval of the proposed Lease will provide approximately \$81,000,000 in revenue from the first full year from execution and approximately \$2.25 Billion through the term of the Lease.

4. Alternatives Considered

- ***Take No Action***

Not executing the proposed Lease will result in cancellation of American's plan to make improvements to Terminals 4 and 5. Abandonment of this plan will substantially defer planned upgrades and will result in little improvement to the LAX passenger experience. Specifically, the plan to renovate American's existing premises and adjacent areas at Terminals 4 and 5 to allow for construction of a TVC to connect the terminals to the APM will not be accomplished. Additionally, not executing the proposed Lease will result in American not being able to make improvements to Terminal 5 to relocate certain other airlines impacted by the APM Vertical Core between Terminals 5 and 6 into Terminal 5, including ticket counters, airline ticket offices and bag systems. American will also not be able to complete construction of the APM Vertical Core between Terminals 4 and 5 to provide connectivity to the automated people mover.

APPROPRIATIONS:

American intends to invest approximately \$287,000,000 to renovate Terminals 4 and 5 at LAX. American intends to fund an estimated \$2,000,000 for proprietary renovations. Staff requests the Board appropriate and allocate the required funds in not-to-exceed amounts of \$321,000,000 comprised of the purchase of non-proprietary improvements (Airline Renovations in the amount not to exceed \$214,000,000) and the issuance of rent credits (Terminal Renovations in the amount not to exceed \$107,000,000) plus an additional \$8,000,000 for LAWA inspection and support costs related to the work, \$191,000,000 to redeem the Terminal 4

Bonds, and \$38,500,000 for the Terminal 4 Additional Assets from the LAX Revenue Fund to WBS Element 1.18.40A-700 (T4 & 5 American Renovation) and other related WBS Elements, as needed, and as identified in the Current Action section and further delineated in the proposed Lease.

STANDARD PROVISIONS:

1. The issuance of permits, leases, agreements, gate and space assignments, and renewals, amendments or extensions thereof, or other entitlements granting use of existing airport facilities involving negligible or no expansion of use and/or alternation or modification of the facilities or its operations beyond that previously existing or permitted is categorically exempt from California Environmental Quality Act (CEQA) requirements pursuant to Article III, Class 1 (18)(c) of the Los Angeles City CEQA Guidelines; and any activity (approval of bids, execution of contracts, allocation of funds, etc.) for which the underlying project has previously been evaluated for environmental significance and processed according to the requirements of CEQA is exempt from further review pursuant to Article II, Section 2.i of the Los Angeles City CEQA Guidelines.
2. This proposed document(s) is/are subject to approval as to form by the City Attorney.
3. Actions taken on this item by the Board of Airport Commissioners will become final pursuant to the provisions of Los Angeles City Charter Section 606.
4. American Airlines will comply with the provisions of the Living Wage /Service Contractor Worker Retention Ordinances.
5. The Small Business Enterprise, Local Business Enterprise/Local Small Business Enterprise, and Disabled Veterans Business Enterprise Programs do not apply to leases.
6. American Airlines will comply with the provisions of the Affirmative Action Program.
7. American Airlines has been assigned Business Tax Registration Certificate number 0000586892-0001-8.
8. American Airlines will comply with the provisions of the Child Support Obligations Ordinance.
9. American Airlines will have approved insurance documents, in the terms and amounts required, on file with Los Angeles World Airports prior to execution of the lease agreement.
10. This action is not subject to the provisions of City Charter Section 1022 (Use of Independent Contractors).
11. American Airlines must submit the Contractor Responsibility Program Questionnaire and Pledge of Compliance and comply with the provisions of the Contractor Responsibility Program prior to execution of the lease agreement.
12. American Airlines must be determined by Public Works, Office of Contract Compliance, to be in compliance with the provisions of the Equal Benefits Ordinance prior to execution of the lease agreement.
13. American Airlines will be required to comply with the provisions of the First Source Hiring Program for all non -trade Airport jobs.
14. This action is not subject to the provisions of the Bidder Contributions CEC Form 55.