



SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

February 15, 2022

To: Carey Upton

From: Julian Capata

Re: Analysis of the application of Historic Districts by the Los Angeles Unified School District

Executive Summary

The Santa Monica-Malibu Unified School District (SMMUSD) has received the anticipated Historic Resource Reports for the elementary and middle schools in Santa Monica. The reports identified potential historic districts at several campuses. The Los Angeles Unified School District (LAUSD) is the only school District that SMMUSD has found that has identified potential historic districts on K-12 campuses. Since identifying potential historic districts at K-12 campuses is relatively new in the preservation community, it is instructive to understand how LAUSD has applied this designation to develop best practices.

In general, during the planning stage of projects, the District proceeds with identification and documentation of contributing and noncontributing buildings, structures, objects, and elements of the historic campus. This assessment includes contributing landscaping/site design features and/or artwork if present as well. Then LAUSD's preservation team will identify, document, and describe the primary and secondary character defining features of each eligible building, structure, object, and elements.

Following LAUSD's best practices, historical districts are managed differently than potential resources that are designated individually. As a historic district is considered as a sum of its parts, some of the parts may be altered or removed while maintaining the integrity of the district. After evaluating specific projects, LAUSD has proceeded with removing or altering lower level contributors and even specific primary contributors. This has allowed LAUSD to meet its educational goals while maintaining the historic district. LAUSD's [Historic Context Statement](#), [Historic Resources Survey Report](#), and [Design Guidelines and Treatment Approaches for Historic Schools](#) can be accessed through the attached links.

Below is a detailed analysis of LAUSD's practices: Los Angeles Unified School District (LAUSD) is the only school District that SMMUSD has identified that has designated components of K-12 campuses as potential historic districts. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." A historic district derives its significance as a single unified entity.

According to the National Park Service, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that

add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Resources that have been found to contribute to the historic identity of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

Future projects that involve new infill construction and/or demolition of contributing features to a historic district have the potential to impact the historic district. However, for potential impacts to be considered a “substantial adverse change” to a historic district under CEQA, it must be shown that the new construction and/or removal of the contributing buildings associated with a project would result in the physical alteration of the historic district such that its ability to convey its historical significance and eligibility for historic listing would be threatened.

Typically, if new buildings are designed to be compatible and differentiated from the historic district using the Rehabilitation Standards, future projects will not result in a “substantial adverse change.” Similarly, if a historic district retains a majority of its contributing features and integrity, and continues to convey its significance, future projects will not result in a “substantial adverse change.”

Three recent projects undertaken by LAUSD involved the removal of buildings and features that contributed to a potential historic District. Below is a summary of the projects, and how LAUSD determined the significance of the demolition of these features in preparing their CEQA documentation.

Thomas Jefferson High School

[Draft IS/MND](#)

[Final MND and Appendices](#)

Thomas Jefferson High School (Jefferson HS) is located at 1319 East 41st Street in the City of Los Angeles. The campus was initially developed in 1917 and following the 1933 Long Beach earthquake was extensively redeveloped. The period of significance is 1935 to 1937 when the campus was redeveloped in the Streamline Moderne style. In 2018, LAUSD published a Draft Initial Study/Mitigated Negative Declaration (IS/MND) in order to evaluate the potential impacts of demolition of 116,000 square feet (sf) of existing buildings, construction of approximately 111,000 sf of new buildings, and modernization and rehabilitation of approximately 53,000 sf of existing buildings. The Project would include construction of a new Athletics Building, Classroom Building, Lunch Pavilion/Shelter, Baseball/Softball Field with associated Maintenance & Operations Building and Tickets and Concessions Building, Tennis Courts, Hardcourts, Garden with Green House, storage containers, and parking areas.

Jefferson HS was determined eligible for the National Register of Historic Places (National Register) and listed on the California Register of Historical Resources (California Register) for its Streamline Moderne architectural style; has retained integrity of setting, design and workmanship, location, feeling and association; and for the quality of its design by master architect Stiles O. Clements.

Primary contributing buildings, structures and landscapes include:

- The Administrative Building (Building 1),
- Auditorium (also Assembly Hall; Building 2),
- Cafeteria (Building 3),
- Classroom Building (Building 4),

- “Great lawn,” located at the corner of 41st Street and Compton Avenue

Secondary contributing buildings, structures and landscapes include:

- Mechanical Arts Building (Building 11),

Tertiary contributing buildings, structures and landscapes include:

- Utility Building (Building 8).

Modernization would be completed for the following three contributors: Administrative Building (Building 1), Main Classroom Building (Building 4), and Auditorium (Building 2). The focus of the modernization is the interiors of these building to bring them up to Division of the State Architect (DSA), California Building Code (and the California Historic Building Code; where applicable), California Department of Education, LAUSD, and Americans with Disabilities Act (ADA) standards. The primary character defining features (CDFs) of the exteriors are proposed to be retained and rehabilitated. Additionally, Cafeteria (Building 3) would be seismically retrofitted and painted.

In order to construct new buildings and structures, the Project would include demolition of the secondary contributing Mechanical Arts Building (Building 11), and the tertiary contributing Power House (Building 8) to accommodate the new Athletics Building.

The new Athletics Building and Classroom Building, as well as a lunch pavilion, would be nearest to the contributing buildings of the potential Historic District and have been designed in a style inspired by the historic Streamline Moderne buildings.

The proposed demolition of the Mechanical Arts Building (Building 11) and Power House (Building 8), contributing buildings, would remove the materials, features, finishes and construction techniques of these buildings from the potential Historic District; however, the majority of the contributing buildings and landscaping and their spatial relationships would be retained.

Furthermore, the new construction, including a new Athletics Building, Classroom Building and lunch shelter, would be sited away from the historic buildings and buffered by a quad to protect the spatial relationships of the contributing resources. The paseo created with the new quad and spacing between the Athletics Building and Classroom Building retains the historic views towards the athletic fields and the north end of campus.

The demolition of the Mechanical Arts Building (Building 11) and the Power House (Building 8), contributing buildings to the potential Historic District, would result in the removal of contributing elements to the potential Historic District. The two buildings are contributing and would result in a loss of historic fabric; however, their removal would not materially impair or significantly detract from the overall site plan such that it would no longer be eligible as a potential Historic District. As such, removal of these buildings would not constitute a substantial adverse change in the historic significance or integrity of the potential Historic District.

The potential Historic District would retain sufficient integrity through the preservation of the majority of the contributing buildings and the contributing landscape. The CDFs of these contributing buildings would be restored or, in limited instances, replaced in-kind, ensuring the integrity of the historical resource and maintaining its eligibility for the National Register and California Register. As such, LAUSD

determined that with implementation of the District's Standard Conditions of Approval (SCs) for minimizing impacts to cultural resources, as well as site specific mitigation measures, impacts under CEQA would be less than significant.

Of particular interest, during the IS/MND public comment period, the Los Angeles Conservancy submitted a comment letter, in which they complemented LAUSD's approach with the comprehensive modernization of Jefferson High for the rehabilitation and upgrade of historic buildings with new construction, demonstrating that significant historic resources can and should be retained as part of a successful campus modernization project. The Conservancy agreed with LAUSD that even with the loss of the two contributing buildings the campus will retain eligibility as a historic district and resource listed in the California Register. The IS/MND for the Jefferson High School Comprehensive Modernization Project was adopted by the Board of Education on November 13, 2018.

North Hollywood High School

[Draft IS/MND](#)

[Combined Technical Appendices NoHo](#)

[Final MND](#)

North Hollywood High School is located 5231 Colfax Avenue in the City of Los Angeles. North Hollywood High School was initially constructed in 1927, with additions starting in 1930 and continuing through the 1970s. For CEQA-compliance purposes, the historic significance of the North Hollywood High School is embodied primarily by a group of buildings and landscape features concentrated in the southeastern portion of the campus, which date to the 1927-1949 era and exemplify the original Mediterranean Revival-style design by architects Myron Hunt and H.C. Chambers. Meanwhile, buildings and landscape features representing the growth of agricultural education at the high school in 1950-1971, concentrated in the westernmost portion of the campus, are also considered to be contributors to the significance. In November 2017, LAUSD published a Draft IS/MND in order to evaluate the potential impacts of demolition of approximately 144,257 sf of existing structures and construction of approximately 233,590 sf of new structures. Demolition would include the removal of 12 permanent buildings and 29 relocatable buildings, and construction of a new Administration Building, Auditorium and a new 2-story classroom building.

North Hollywood HS was determined eligible for the National Register of Historic Places (National Register) and listed on the California Register of Historical Resources (California Register). For CEQA-compliance purposes, the historic significance of the North Hollywood High School is embodied primarily by a group of buildings and landscape features concentrated in the southeastern portion of the campus, which date to the 1927-1949 era and exemplify the original Mediterranean Revival-style design by architects Myron Hunt and H.C. Chambers (Jerabek et al. 2016:2-5). Meanwhile, buildings and landscape features representing the growth of agricultural education at the high school in 1950-1971, concentrated in the westernmost portion of the campus, are also considered to be contributors to the significance.

Primary contributing buildings, structures and landscapes include:

- Kennedy Hall (Building 1)
- Library (Building 6)
- Landscaping and interior courtyards accompanying the 1927-1930 buildings

Secondary contributing buildings, structures and landscapes include:

- Frasher Hall (Building 2)
- Auditorium (Building 7)
- Agricultural Area, including the barn (Building 32) and three minor ancillary buildings/structures (Buildings 31, 46, and 58)

Tertiary contributing buildings, structures and landscapes include:

- Randolph Hall (Building 5)
- Girls' Physical Education Building (Building 16)

In general, the primary contributors date to the original construction of the campus in 1927-1930 and retain excellent historic integrity, while the secondary and tertiary contributors were constructed in or after 1936 or, in the case of the Auditorium, was among the original group of buildings but has been significantly altered.

Kennedy Hall and Frasher Hall will undergo minor additions, while Kennedy Hall, the Library, and the landscaping associated with the 1927-1930 buildings, may receive visual and atmospheric impact from the new construction. In the Agricultural Area, the only change will be the relocation of a pasture area on the eastern edge of the southern Agricultural Area north to an area currently occupied by portables.

The project design proposes the construction of an exterior elevator shaft at the eastern end of Frasher Hall and a covered walkway/bridge from this new addition to the southwestern end of Kennedy Hall. The portions of Kennedy Hall and Frasher Hall that will be impacted by the proposed addition comprise a secondary façade of a primary contributor and a primary façade of a secondary contributor. As such, their preservation is of secondary importance to the overall historic integrity of the North Hollywood High School campus. The effect of the addition would not constitute a "substantial adverse change" in the historic significance of the campus.

The project design calls for the demolition of Randolph Hall, the Girls' Physical Education Building, and the Auditorium. Of these buildings, the Auditorium is classified as a secondary contributor, while Randolph Hall and Girls' Physical Education Building are classified as tertiary contributors. The demolition of these three buildings would clearly have an effect on the overall historic integrity of the campus. However, as secondary and tertiary contributors, their removal would not critically diminish the historic value and architectural merits of the campus that qualify it for listing in the National Register of Historic Places and the California Register of Historical Resources. Therefore, the effect would not constitute a "substantial adverse change" in the historic significance of the campus as a whole under CEQA.

The potential Historic District would retain sufficient integrity through the preservation of the majority of the contributing buildings and the contributing landscape. As such, LAUSD determined that with implementation of the District's Standard Conditions of Approval (SCs) for minimizing impacts to cultural resources, as well as site specific mitigation measures, impacts under CEQA would be less than significant. The IS/MND for the North Hollywood High School Comprehensive Modernization Project was adopted by the Board of Education on April 10, 2018.

HUNTINGTON PARK HS

[Draft EIR](#)

[Appendices](#)

[Final EIR](#)

Huntington Park High School (HPHS) campus is located at 6020 Miles Avenue in the City of Huntington Park. HPHS was founded in 1909, but the earliest extant buildings on the campus were constructed in the 1920s and following the 1933 Long Beach Earthquake, the historic core of the campus was designed in the PWA Moderne Style, including the Administrative Building (Building 1) and Cafeteria Building (Building 3; 1936), the Auditorium Building (Building 2) and Mechanical Drawing Building (Building 6; 1937), and the Social Arts Building (Building 12; 1939). Additions continued through the 1930s into the early 2000's, with the period of significance identified as the PWA construction in the 1930s.

The Project on the campus would entail construction of up to 102,320 square feet of new buildings and facilities and would remove 35 of the existing 55 classrooms and construct 21 classrooms for a reduction of 14. The Project includes demolition and removal of eight relocatable buildings and four permanent buildings: Home Economics Building (Building 4) built in 1924; and Annex Building (Building 8) built in 1925, Gymnasium Building (Building 13) built in 1923, and Central Plant (Building 5) built in 1923; 29 construction of two-story Classroom Building A, one-story Specialty Classroom Building B, Gymnasium Building C, and outdoor pool; remodel and modernization of Administrative Building (Building 1); and minor improvements (e.g., exterior/interior paint as needed) for the remaining buildings including the Science & Classroom Building (Building 30) and Classroom Building 1 (Building 25). The architectural style of the new classroom buildings and gymnasium building would have elements of "PWA Moderne style" that would complement the original architecture of the campus.

HPHS is eligible for the NRHP and CRHR as an architecturally significant and distinctive example of a PWA Moderne-style school rebuilt following the 1933 Long Beach earthquake. The campus is eligible as a historic district, a single historical resource (a school) with buildings, structures, and other features, such as landscaping, as either contributing (primary, secondary, and tertiary) or noncontributing features of the historic resource.

There are three categories of historical resources on the campus by historical significance as primary (significant), secondary (contributing), and tertiary (contributing) resources. Significant character-defining buildings and landscapes determine the eligibility of a historical resource and are the most important features to retain. Contributing character-defining buildings and landscapes are secondary and tertiary features that, taken together with the primary features, convey a property's significance as a historical resource.

Primary contributing buildings, structures and landscapes include:

- Administrative Building (Building 1)
- Auditorium Building (Building 2)
- Home Economics Building (Building 4)
- Annex Building (Building 8)
- Interior Courtyard and Landscaped Open Area (along Miles Avenue, extending from the south side of the Gymnasium to Randolph Street and includes the areas in front of the Administrative Building and Auditorium Building).

Contributing (Secondary):

- Cafeteria Building (Building 3)
- Parent and Family Center (Building 12)

Contributing (Tertiary):

- Gymnasium Building (Building 13)

LAUSD determined that the buildings to be demolished would require an extensive amount of structural retrofitting, and due to the fact that the existing structural system does not allow the enlargement or combining of undersized classrooms, the District determined it was infeasible to retrofit and modernize these buildings.

The project would result in the demolition of the primary Home Economics Building (Building 4) and Annex Building (Building 8) and tertiary Gymnasium Building (Building 13) character-defining buildings. As such, three of the seven character-defining buildings would be demolished; almost half of the character-defining buildings on the campus. Due to the substantial loss of character-defining buildings, HPHS's integrity of design, materials, workmanship, setting and feeling would be compromised; therefore, following Project completion, the campus as a whole would be ineligible for listing on the National Register and California Register. Thus, the historical significance of the campus as a historic district would be materially impaired, and the Project would result in a significant and unavoidable impact to HPHS. However, LAUSD identified that retention of all potentially historic buildings may not be feasible. Reasons that a resource may not be eligible for adaptive reuse, retrofit or renovation include, but are not limited to structural integrity, inability to modify interior spaces to meet current educational specifications and goals, cost of retrofit and/or renovation exceed DSA standards. In such cases where an identified historic resource would be demolished, LAUSD must prepare an Environmental Impact report, identify that demolition of the historic resources would result in a significant and unavoidable adverse impact, and there are no feasible mitigation measures, or mitigation measures would reduce impacts but not to less than significant levels, the remaining impacts are considered significant and unavoidable. Unavoidable adverse impacts may be considered significant on a project-specific basis and/or cumulatively. The LAUSD must prepare a "statement of overriding considerations" before it can approve the Project, attesting that the Board of Education, as the decision-making body, has balanced the benefits of the proposed Project against its unavoidable significant impact. The EIR for the Huntington Park High School Comprehensive Modernization Project was certified by the Board of Education on May 8, 2018 and included a Statement of Overriding Consideration due to the significant and unavoidable impact to the historic resources.

Summary

LAUSD has developed policies that emphasize the preservation of eligible historic resources when feasible while still allowing the project to meet the educational design goals of the District, which is similar to SMMUSD policy. In their evaluation of historic districts, LAUSD determines the types of resources on the campus and categorizes them as; 1) Primary; 2) Secondary; 3) Tertiary. Generally, the demolition of a primary resource results in a significant impact to the resources under CEQA, and if the District chooses to move forward with the project, an Environmental Impact Report must be prepared, and LAUSD must adopt a Statement of Overriding Considerations. Demolition of secondary and tertiary resources generally do not create a significant impact under CEQA. Historic resources are also evaluated

for their suitability for renovation, remodeling, and adaptive reuse. If the building cannot meet current rehabilitation and retrofit standards, as set forth by DSA, LAUSD will move forward with demolition of the building. LAUSD also utilizes *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation* when consistent with educational goals and feasible with project design and goals.

The process that LAUSD follows is similar in nature to those proscribed in SMMUSD's Board Policy BP 7113 FACILITIES - Historical Resources, and Administrative Regulation AR 7113 FACILITIES - Historical Resources.