



November 14, 2017

Mr. Edward Paek, CEQA Project Manager
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**RE: Roosevelt High School Comprehensive Modernization Project
(Roosevelt Comp Mod) NOP**

Dear Mr. Paek:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Roosevelt High School Comprehensive Modernization Project and proposed demolition and replacement of the campus, which has been identified as a National Register-eligible historic district. Given the rarity and historic cultural significance of the campus, and its strong connections to the Boyle Heights community, we are concerned about the loss of this important community asset.

As there will be an unavoidable significant impact, we urge LAUSD to consider a range of potentially feasible alternatives to demolition in the Draft Environmental Impact Report (EIR) that could accomplish most of the project goals while retaining one or more of the campus' historic buildings, notably the original Auditorium and Classroom Building (Building 1).

I. Historical Significance of Roosevelt High School Campus

Located at 456 Mathews Street in Boyle Heights, Roosevelt High School is culturally significant for its association with the 1968 student walkouts, known as the "Blowouts," which were an important early activity in the Chicano Civil Rights movement. Roosevelt High was identified as a National Register-eligible historic district for its association with the Chicano Civil Rights movement by Los Angeles' SurveyLA in 2014 and that finding was reaffirmed by LAUSD's Supplemental Historic Resource Evaluation Report for the campus in May 2017.

The campus opened in 1923 and expanded over the decades to encompass the entire block bounded by Mathews, Mott, 4th and 6th Streets. The original Auditorium and Classroom Building (Building 1), which received a seismic upgrade and PWA Moderne remodel following the 1933 Long Beach earthquake, continues to anchor the campus which contains a mix of buildings from subsequent decades.

Roosevelt High, along with four other East L.A. high schools, was thrust into the national spotlight in March 1968 when Mexican-American students staged the Blowouts to demand educational equality. Smaller and bilingual classes, more Latino teachers and a curriculum that addressed Latino history, and counseling for



college entrance rather than automatic vocational training were among the students' requests.

Building 1 is documented as the primary setting for activities associated with the Blowouts on the Roosevelt campus, including a sit-in that students staged on the lobby stairs and an assembly held by District officials in the auditorium.

The Blowouts – and Roosevelt High's pivotal role in this -- were a catalyst for the Chicano Civil Rights movement in Los Angeles that spread throughout the nation. It is widely considered the first major protest against racism and educational inequality staged by Mexican-Americans in the United States.

II. Project Description, Purpose and Need

According to the NOP, the proposed project is designed to address the most critical physical concerns of the buildings and grounds at the campus while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.

The district's goal to provide a safe and healthy environment that promotes learning is important. Preservation, continued use, and rehabilitation of historic school facilities are fully capable of achieving this outcome, an approach LAUSD has demonstrated with other historic school facilities. However, what is not clear is the purpose and need to demolish and replace Roosevelt High's historic campus buildings with a new facility.

Citing concerns about unique seismic challenges associated with Roosevelt High, LAUSD provided the Conservancy, *The Building 1 Seismic Analysis Project* ("study"), completed by the DLR Group and subcontracted through Saiful Bouquet, dated October 19, 2017. The study states, "[i]t is important to also note that many of the existing building structural elements are inadequate to effectively contribute to the seismic resisting systems, and as a result they are being bypassed and not relied upon with the majority of the proposed upgrade work resisting 100% of the seismic forces rather than supplementing the existing systems."

Several questions have arisen as we attempt to understand why seismic challenges are more pronounced at Roosevelt High, especially in comparison to other similar LAUSD facilities that have been retained and retrofitted. Why does the project exceed the 50 percent threshold of replacements costs, and did that cost include the seismic costs as well? Would the scheme change if the existing lateral force resisting elements were counted in the capacity instead of "bypassed"? Are the previously added shotcrete shear walls being counted? If not, why? The study provided to the Conservancy was published after the issuance of the NOP. Is there an earlier study available that provides more details that informed LAUSD's decision making process?

Fortunately, code flexibility for historic buildings and technological advances provide myriad options for seismically retrofitting historic buildings with minimal impacts to character-defining features.

Preservation Brief 41: The Seismic Retrofit of Historic Buildings is a good primer on issues to consider when planning a seismic retrofit:

Reinforcing a historic building to meet new construction requirements, as prescribed by many building codes, can destroy much of a historic building's appearance and integrity. This is because the most expedient ways to reinforce a building according to such codes are to impose structural members and to fill irregularities or large openings, regardless of the placement of architectural detail.



The results can be quite intrusive. However, structural reinforcement can be introduced sensitively. In such cases, its design, placement, patterning, and detailing respect the historic character of the building, even when the reinforcement itself is visible.¹

Preservation architects and engineers have made great strides in addressing seismic concerns. Recent advances in carbon and composite fiber wrap, center coring, and the strategic insertion of shear walls and bracing have allowed our most beloved historic buildings, such as the 1913 Los Angeles County Natural History Museum and the 1911 Huntington Art Gallery, to retain significant historic fabric, adhere to the *Secretary of the Interior's Standards*, and meet today's seismic and use requirements. These innovations have been facilitated by the California Historical Building Code, which offers code flexibility to meet the performance requirements of current codes without sacrificing historic integrity.

III. Draft EIR Must Evaluate a Range of Potentially Feasible Preservation Alternatives

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."² To this end, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.³

Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁴ Based on objective analyses found in the EIR, agencies "shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so."⁵ The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁶

As currently envisioned, the proposed project would demolish all existing contributors to the National Register-eligible historic district, resulting in the complete loss of the historic resource. Accordingly, the draft EIR should evaluate at least one preservation alternative that would retain and adaptively reuse sufficient historic district contributors as part of the project to maintain the campus' continued National Register eligibility.

We want to see Roosevelt High become a high quality educational facility, as the proposed project seeks to create, and we believe that can also be accomplished through a partial preservation alternative that retains and seismically upgrades Building 1 as part of the overall project. While such an alternative would likely not enable the campus to retain its National Register eligibility, we believe it would allow for a project that can honor the rich cultural significance of Roosevelt High, while mitigating some of the other losses associated with the proposed project.

¹ Preservation Brief 41: "The Seismic Retrofit of Historic Buildings - Keeping Preservation in the Forefront," David W. Look, AIA, Terry Wong, PE, and Sylvia Rose Augustus (National Park Service). See <https://www.nps.gov/tps/how-to-preserve/briefs/41-seismic-rehabilitation.htm>.

² Public Resource Code, Sec. 21001 (b), (c).

³ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.

⁴ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁵ Public Resource Code, Sec. 21002.1.

⁶ Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



The renovation of existing buildings and new construction are not mutually exclusive and the retention of Building 1 would not lessen the various upgrades planned throughout the rest of the campus. While it may not make as efficient use of space as a new classroom building, a renovated Building 1 alongside much of the project's proposed new construction would enable LAUSD to accomplish most of its goals for a revamped campus while retaining Roosevelt's iconic centerpiece and most important physical link to the Blowouts.

In evaluating a partial preservation alternative that retains Building 1, a reconfiguration of some of the proposed new structures will be necessary. Of the six new structures proposed, three occupy portions of the footprint of Building 1: the gymnasium and the two classroom buildings on the east side of the campus's central axis.

Shifting the gymnasium south to 6th Street where surface parking is currently proposed allows that structure to remain adjacent to the athletic field. The footprints of the two new classroom buildings opposite the central quad are partly encompassed by that of Building 1, suggesting in part that a renovated Building 1 could provide a portion of the classroom space currently proposed for the same site in new construction.

IV. Lead Agency Must Not Pre-Commit to a Project

Pre-planning stages for the Roosevelt High School Comprehensive Modernization Project included the Board of Education's approval of pre-design and due diligence activities necessary to define the proposed project in March 2015. This included the completion of a preliminary historic resource evaluation in June 2015 that was flawed and incorrectly identified the campus as not being eligible as a historic resource when in 2014 the campus had been identified as a National Register-eligible historic district through the City of Los Angeles' SurveyLA program.

Following our review of the preliminary historic resource evaluation, the Conservancy provided LAUSD with additional information highlighting the cultural significance of the campus and the need for a thorough historic resource assessment that evaluated the campus based on local, state and national eligibility criteria. As a result, the 2017 cultural resource evaluation (*Draft Supplemental Historic Resource Evaluation Report for Roosevelt Senior High School, Los Angeles, Los Angeles County, California*, ASM Affiliates, May 2017) identified the campus as a National Register-eligible historic district for its associations with the Blowouts and Chicano Civil Rights movement.

While LAUSD has now commissioned a thoroughly comprehensive evaluation that detailed the cultural significance of Roosevelt High and four other LAUSD campuses associated with the Blowouts, it appears that the planning for the proposed Roosevelt High project, as initially conceived, has continued apace without reconsidering the retention of any identified historic resources. Instead, an Interpretive Plan is included as an appendix to the cultural resource evaluation.

LAUSD's action on August 22, 2017 is also problematic, where the Board of Education authorizes the Chief Procurement Officer to enter into a contract (\$144,357,565) with Swinerton Builders and LPA, Inc. for the "Design and Construction of the Roosevelt High School Comprehensive Modernization Project." This action appears to pre-commit LAUSD to a certain outcome prior to the completion of the environmental review process, and consideration of viable preservation alternatives. Has a contract been signed and was any CEQA review or clearance completed for this action? Also, are there contingencies in place within the contract, should LAUSD pursue a preservation alternative instead?



An agency may not pre-commit to a project before CEQA review is completed, because “[a] fundamental purpose of an EIR is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.”⁷ Even though CEQA review has just begun, LAUSD must take care to allow the environmental review process to determine the version of the project that is ultimately certified.

A further concern involves the community outreach for the proposed project, which may not have proactively alerted local residents and stakeholders to the campus’s change in historical status several months after the initial community meetings erroneously informed residents it lacked historical significance. With the environmental review commencing and public comments being sought, we hope LAUSD will provide greater transparency in addressing the community on the campus’s historical status and fully explain that preservation alternatives must be considered alongside the proposed project.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the NOP for the Roosevelt High School Comprehensive Modernization Project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

⁷ *Laurel Highlands Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 394.

