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**Submitted by email**

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**RE: Roosevelt High School Comprehensive Modernization Project  
(Roosevelt Comp Mod) DEIR**

Dear Mr. Paek:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Roosevelt High School Comprehensive Modernization Project. Students deserve the safest, highest-quality school facilities possible. However it is not an either/or choice, as the Conservancy strongly believes Roosevelt High School should be modernized but not at the unnecessary expense of the community's shared history. As part of much-needed upgrades to facilities, we would like to ensure that eligibility of the Roosevelt High School campus (or a portion thereof, as a partial preservation approach) remains as a historical resource, while minimizing adverse impacts associated with the proposed project.

The Conservancy strongly believes feasible preservation options exist to accomplish this goal. We urge the Los Angeles Unified School District (LAUSD) to set an example for its students of responsible historic and cultural stewardship by adopting a preservation alternative as the preferred project. We greatly appreciate LAUSD's willingness to work cooperatively with the Conservancy, and we look forward to continued conversations that we hope will result in a preservation-based solution.

As currently proposed, LAUSD will demolish a rare collection of historic and culturally significant buildings, eligible as a National Register historic district for its association with the nationally significant 1968 Chicano Blowouts. Among the buildings proposed for demolition in the Roosevelt Comprehensive Modernization project is Roosevelt High's centerpiece, its original 1922 Auditorium and Classroom Building (also known as Building 1 and the R Building), a primary contributor to the historic district and an individually eligible historic resource. Additional contributing buildings to be demolished include the Industrial Arts building (1968), Classroom Building 7 (1937), Instrumental Music Building (1959), Classroom Building 17 (1964), Classroom Building 18 (1964), Gymnasium Building (1968), and the Utility Building (1968).

According to the DEIR, the proposed project is designed to address the most critical physical concerns of the buildings and grounds on 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 and rehabilitation of historic campus buildings are fully capable of achieving 21<sup>st</sup> century classroom standards, an approach LAUSD has demonstrated with other historic school facilities.

While we are encouraged by LAUSD's effort to consider preservation alternatives that retain and upgrade the R Building as part of the Roosevelt High Comprehensive Modernization project, we are concerned that the analyses of the alternatives are not evaluated in great detail. Furthermore, new information about Alternative 2, including a site plan, was only recently presented at a public meeting on March 17, 2018. Such pertinent information is currently not available to the general public.

As there will be an unavoidable significant impact to an important collection of historic resources, we urge LAUSD to provide additional information and analyses of Alternative 2, and other potentially feasible alternatives to demolition that could accomplish most of the Roosevelt High Comprehensive Modernization project goals while retaining the R Building.

## **I. Historical Significance of Roosevelt High School Campus**

Located at 456 Mathews Street in Boyle Heights, Roosevelt High School is of national significance for its association with the 1968 student walkouts, known as the "Blowouts," which were an important early effort 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 the City of Los Angeles' SurveyLA in 2014. 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 R), 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 Lincoln, Garfield, Wilson (now El Sereno Middle School), and Belmont High, was thrust into the national spotlight in March 1968 when Chicano students staged the Blowouts to demand educational equality. Last month marks the 50<sup>th</sup> anniversary of the historical event and presents an opportunity to recognize the important role Chicano students, Los Angeles, and LAUSD's five schools played in a nationally significant youth led movement for educational reform.

The R Building 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. Historians have detailed the significance of the Walkouts as the first major protest against racial and educational inequality by Chicanos in the U.S., serving as an important catalyst for the Chicano movement in Los Angeles and beyond.

Adding another layer of cultural significance to the R Building are several important campus murals found in its interior, including the "Harvey Milk Day of Service." As stated in the DEIR, the murals at Roosevelt High are "powerful expressions of the Roosevelt High School student social activism, culture, and community struggles."<sup>1</sup>

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<sup>1</sup> Draft EIR, 3.2-20.



With few sites representing Latino heritage landmarked on the national state, and local level, protecting known significant Latino heritage resources, such as those associated with the 1968 Blowouts, becomes of urgent concern. Preserving and rehabilitating Roosevelt High's R Building will build on the efforts of the Latino Heritage Scholars, an initiative of the Hispanic Access Foundation, and others who work to protect, share, and celebrate significant sites related to Latino heritage, including those associated with the Blowouts and Chicano civil rights history.

Given the significance of the site, the Conservancy and others have focused on a preservation alternative that offers a realistic win-win solution and does not call for preservation of the entire eligible historic district. We fully understand the challenges and need to provide some new facilities at Roosevelt High. However, that goal is not mutually exclusive of preservation and reuse, as we strongly believe a more viable plan should be considered, one that successfully includes preservation and new development. For these reasons we are focusing on preservation of only the R Building instead of the entire historic district.

## **I. Feasible Preservation Alternatives Exist that Avoid or Substantially Lessen Significant Adverse Impacts on Historic Resources**

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."<sup>2</sup> 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."<sup>3</sup>

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.<sup>4</sup> 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."<sup>5</sup> 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.<sup>6</sup>

### **A. Alternative 2: Retention and Renovation of the R Building Would Mitigate the Significant and Unavoidable Environmental Impacts of the Demolition of the Roosevelt Senior High School Historic District**

As currently envisioned, the proposed project would demolish the existing contributors to the National Register-eligible historic district, resulting in a significant loss of the historic resource. The DEIR has evaluated three preservation alternatives, all of which would result in the loss of most of the historic district contributors. Alternative 1 is no project and therefore not a bona fide alternative. The Conservancy believes "Alternative 2 – Rehabilitation of Building 1" is the most viable and capable of meeting project goals and objectives. We encourage LAUSD to spend additional time on this alternative to address the identified challenges as part of a good faith effort to allow for a potential win-win outcome. The third alternative would retain the historic district, but would not meet most of the Roosevelt High Comprehensive Modernization project objectives, and is not a meaningful preservation alternative. Alternative 4 is similar to Alternative 2, though it does not make improvements to the R Building.

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<sup>2</sup> Public Resource Code, Sec. 21001 (b), (c).

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

<sup>4</sup> *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.

<sup>5</sup> Public Resource Code, Sec. 21002.1.

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



According to the DEIR, Alternative 2 meets a majority of the project objectives and can partially meet additional objectives:

- Objective 3: While the Building's existing structural layout would restrict classroom proportions, many classrooms can be still be enlarged to meet California Department of Education educational specifications. In addition, as new concrete shear walls for seismic retrofit are required, care to place these in as many non-classroom spaces within the R Building as possible may reduce blocking existing classroom windows and/or allowing for more viable classroom configurations.
- Objective 7: Because the footprint of the R Building is within the academic zone it remains compatible with adjacent academic functions. The gym was sited along the same axis as the academic zone in the proposed project, so retaining the R Building would simply require it be moved further south and would not impede improving the overall functionality and utility of the campus.
- Objective 11: Modern and permanent classrooms can be achieved by retrofitting and rehabilitating the R Building. Also, a cost analysis of Alternative 2 is not currently available for public review.
- Objective 12: If retrofitted and rehabilitated, the R Building can continue to serve students and the district.
- Objective 14: The athletic zone would not be bisected if the R Building is retained as stated in the DEIR. Reconfiguration of the site plan can improve campus access, safety supervision, and circulation.
- Objective 16: There is no comparison of project timelines to prove that renovation and construction activities would not occur in a timely manner.

In the analysis of Alternative 2, the DEIR states, "The purpose of [Alternative 2] is to renovate Building 1 in a manner that the historic character/character defining features of the building would be retained and renovated following *Secretary of the Interior Standards* and the significant and unavoidable impact associated with loss of the individually eligible resource (Building 1) would be avoided." This understanding of the Secretary's Standards is unnecessarily limited, given that Roosevelt High is eligible for listing on the National Register because of its association with an important historical event and historic personage, not for its architecture. Therefore, there may be more leeway in the guidelines to reconfigure the building's interiors in order to provide more efficient classroom space.

Overall, the DEIR provides only limited details on Alternative 2, as no site plan, seismic study with calculations, or cost analysis is provided. This makes it difficult to understand the particulars of this alternative and why LAUSD believes it cannot meet core project objectives. Based on a request by the Conservancy, in mid-March we did receive a version of the site plan and detailed seismic studies. We are very appreciative to have the new, detailed analysis and thank LAUSD for responding to our request. We also appreciate the meeting that the Conservancy had with LAUSD staff on March 15. Based on the seismic studies and discussion at the meeting, we have a better understanding of the seismic issues and are not convinced that the existing structural system of Building R precludes rehabilitation.

The Conservancy would like to see Roosevelt High School become a 21<sup>st</sup> century educational facility and believe that Alternative 2 would allow for a project that would honor the rich cultural significance of Roosevelt High, while meeting most of the overall project objectives. As a partial preservation alternative, Alternative 2 would not enable the campus to retain its National Register eligibility as historic district, but it would maintain the individual eligibility of the R Building and provide meaningful mitigation for the other losses associated with the proposed project.





## B. Seismic Issues Are Not Insurmountable

The Conservancy has spent considerable time evaluating the seismic analysis that is included within the DEIR, and additional studies that have been provided to us since the release of the DEIR. From the DEIR, seismic studies appear to be limited by “a cursory review of the available construction documents, previous reports and brief observation of each building.”<sup>7</sup> In addition, the DEIR states that analysis “did not include a detailed comprehensive structural review of existing structures subject to gravity and/or seismic loadings” and “exhaustive structural calculations were not performed as part of this work, nor was computer modeling of the structures.”<sup>8</sup>

To help us better assess and understand the seismic issues, we have also consulted with David Cocke of Structural Focus, an expert in structural engineering, to fully review LAUSD’s analysis. We’ve asked LAUSD the following questions:

- 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?

Through our conversation with LAUSD and the additional structural reports that you provided, we now have a much better understanding of the seismic issues and the method proposed to retrofit the R Building. Thank you for making yourself and consultants available to answer questions and explain in much greater detail. Our conclusion is the same as the DEIR’s, which states the seismic retrofit “could be accomplished while maintaining the historic character of Building 1 and would be completed in accordance with the Secretary of the Interior Standards for the Treatment of Historic Properties.” While we understand this has some implications on classroom configurations, we do not see the seismic retrofit being an insurmountable challenge. This approach can provide for a safe building and maintain the historic eligibility of the R Building, while ensuring a safe building and learning environment.

While there are unique seismic challenges presented at Roosevelt High School, we believe further study of solutions for retrofitting and rehabilitating the R Building could identify approaches that would maximize classroom spaces to meet current needs. The retrofit will require more creativity and sensitivity, especially in the placement of shear walls to maximize the total number of usable classrooms. 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. We strongly encourage LAUSD to reconsider this approach and other preservation alternatives, including those that might not strictly adhere to the *Secretary of the Interior’s Standards* but will still maintain eligibility of the R Building.

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<sup>7</sup> Roosevelt High School Comprehensive Modernization Project Draft EIR, V.2, 2.0 Existing Site Survey and Investigation, 257.

<sup>8</sup> *Ibid.*, 259.



### **C. Required Classrooms Are Provided**

According to the DEIR, the R Building provides 48 classroom spaces, 31 of which are currently in use. Of those in use, twenty are considered too small (less than 800 sq. ft.) by current LAUSD standards. Based on the proposed seismic analysis provided within the DEIR, specifically the DLR study, it estimates a post-retrofitted R Building to provide a total of 21 usable classroom spaces. Based on conversations with LAUSD staff, we understand this falls short of the total needed, by approximately 15 classrooms. However the DEIR itself does not appear to indicate this shortfall or the number of classrooms that will be provided within the proposed new buildings as part of the preferred project. Only a total number of 111 classrooms is indicated, representing an overall reduction in the current count of 132 classrooms.

Our review of the floorplans provided within the DLR study indicates an inefficient layout that could be reconfigured to increase the number of usable classroom spaces, perhaps by as many as 5 additional classrooms. There are numerous spaces indicated as miscellaneous, or deemed too small, yet could be reconfigured so as to better meet the needs. For example, DLR's Second Floor Plan Test Fit indicates a string of continuous miscellaneous spaces totaling 2,920 square feet. The placement of shear walls and interior columns could be addressed to allow for one or two more classroom spaces in this location.

We understand the classroom spaces at Roosevelt High School are deemed inferior by LAUSD due to their rectangular shape and orientation, versus a preferred, square classroom space. However, this is not solely an issue that is inherent to Roosevelt High School, as classroom spaces at other LAUSD historic campuses pose similar challenges. While not ideal it is also not an insurmountable challenge or reason enough to demolish an historic building. Further, Alternative 2 calls for additional, new classroom spaces, in addition to the rehabilitation of the R Building, which will be of the size and shape preferred by LAUSD.

### **D. Alternative Site Planning and Design Can Address LAUSD Needs**

The DEIR does not include detailed site planning analysis for Alternative 2. Only an illustration that indicates buildings to be demolished is provided, as indicated through Figure 4.0-2, "Historic District Contributors and Buildings to be Demolished." Likewise, the same type of limited illustration is provided for Alternatives 3 and 4. We believe this to be inadequate and the reason why we requested LAUSD to provide a site plan that accurately portrays the alternatives as described in the DEIR. In mid-March we received a site plan for Alternative 2.

The Conservancy greatly appreciates LAUSD providing these materials. However, we are concerned that this was not provided to the broad public and the plan we received was inaccurate, as it included a building (Instrumental Music Building) not indicated for preservation as part of Alternative 2 analysis. We understand this was made in error and an updated site plan was provided as part of a Power Point presentation by LAUSD on March 17, 2018. At this meeting LAUSD made available new information, including a site plan, regarding Alternative 2 at a public meeting organized by the Committee to Defend Roosevelt at Hollenbeck Police Station. This new information should be included in the DEIR to inform the public about the proposed project and its preservation alternatives.

Based on conversations with LAUSD and our independent review, we believe site planning and design to be the primary challenge standing in the way of preserving and retaining the R Building as part of Alternative 2. We understand the challenges of wanting to provide a safe and secure campus as well as developing a plan that allows for the desired amenities and future expansion of athletic fields. These are not mutually exclusive from preservation or reason alone to demolish a significant historic and cultural resource. Did LAUSD consider other site planning options, including reducing or relocating tennis and basketball courts elsewhere on site, or additional means to provide the required parking such as a parking



structure with tennis and basketball courts on the roof? This is a particularly tight site which might require special consideration in order to meet the listed objectives. LAUSD has stated that we don't want to have disparities between school campuses and the types of amenities offered. We fully agree though inherently all LAUSD school campuses are unique, as none are the same and each offers opportunities and challenges when considering a modernization project. We all need to be looking for creative and innovative solutions as there is a disparity when some schools and communities are allowed to retain their historic buildings while others are not.

Further study of the Alternative 2 site plan is necessary and strongly encouraged in this regard to identify opportunities to improve site circulation, while maintaining a safe school environment and freeing up space for needed fire lanes. We intend to do the same and provide LAUSD suggestions for other viable site planning options, though more time is necessary given we only recently received the site plan. This may include demolition or reconfiguration of one or more of 1970s buildings on campus, building a multi-level parking structure, reducing the amount of outdoor basketball or tennis courts, siting some, or all of the outdoor basketball or tennis courts on top of new construction, or adding additional floors to new construction.

## **II. Lead Agency Must Not Pre-Commit to a Project**

As included in our November 14, 2017 Notice of Preparation (NOP) comments, we are concerned that LAUSD has proceeded in a manner as to preclude consideration of preservation alternatives, prior to the completion of the required CEQA analysis.

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 authorized 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? In our meeting with LAUSD on March 15, 2018, when asked about the cost implications of choosing Option 2, it was mentioned that there would be an additional cost if the contract were changed to a preservation alternative. And the cost of the change would be added to the actual cost of construction.

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.”<sup>9</sup> 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.

**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.

The Conservancy greatly values working with LAUSD and understands the immense task it has in caring for and being a steward of hundreds of historic school campuses. Our intent is to work collaboratively toward preservation solutions whenever possible, especially in challenging projects like this where there are no easy solutions. We are hopeful that together we can identify a plan for moving forward.

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

Sincerely,



Adrian Scott Fine  
Director of Advocacy

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<sup>9</sup> *Laurel Highlands Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 394.

