



March 29, 2012

Submitted by email

Ms. Gwenn Godek
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 28th Floor
Los Angeles, CA 90017
Email: gwenn.godek@lausd.net

Re: Draft EIR for the Jordan High School Redevelopment Project

Dear Gwenn:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Jordan High School Redevelopment Project. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,700 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.

As a National Register-eligible historic district, the Conservancy would like to ensure that eligibility of the Jordan High School campus as a historical resource is maintained, while minimizing and avoiding any 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.

I. Historic Significance of Jordan High School Campus

Jordan High School was established in 1925 and named after the naturalist and Stanford University president, David Starr Jordan. The historic campus boasts a collection of five structures from its earliest period. Four of the five structures were all constructed between 1925 and 1927, including the Administration Building, its West Annex also known as the Domestic Science Building, the North Annex, and the Auditorium,. Following the 1933 Long Beach earthquake, these buildings were seismically retrofitted in 1935 and renovated with a unifying PWA (Public Works Administration) Moderne style. Prominent Los Angeles architect Sumner P. Hunt designed the remodeling and retrofitting effort with builder George M. Easton and under the supervision of the district architect Alfred S. Nibecker, Jr. A loggia connecting the Administration Building to the North Annex also was constructed in 1935 and constitutes the

fifth structure in this historic district determined eligible in 1994 for listing in the National Register of Historic Places.

Three additional buildings on campus date from the same period of construction: the PWA Moderne-style girl's gymnasium (1937), and two shop buildings from the 1920s that were also seismically upgraded in 1935. While the Draft EIR notes these buildings have been altered and are not considered historic resources, more information should be provided as to the extent of alterations and potential loss of integrity. The Girl's Gym, in particular, appears very similar in design to the PWA Moderne style of the other structures in the historic district and should be considered a contributing resource.

Between 1934 and 1938 in the midst of the Great Depression, the Los Angeles School Project rehabilitated or constructed 536 school buildings throughout the county. The historic portions of the Jordan High School campus reflect this period of construction, with district- and county-wide efforts to repair, renovate, and construct seismically secure school buildings following the devastation of the 1933 earthquake. As a "make work" initiative under the federal Public Works Administration, hundreds of laborers were employed, including forty-eight architects, engineers, and construction expert.

As the legacy of this national and local public works effort, the Jordan High School Campus buildings represent a limited, and increasingly diminishing, resource type. The five district contributors, as well as the Girl's Gym, are unified through the smooth exterior surfaces, classically-inspired piers, and geometric ornamentation characteristic of PWA Moderne. In particular, the three buildings along 103rd Street—the Domestic Science Building, Administration Building, and the Auditorium—create a cohesive and highly visible street frontage that should be retained.

II. Demolition of the Domestic Science Building and the North Annex is an Unavoidable Significant Adverse Impact under CEQA

A key policy under the California Environmental Quality Act (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."¹ 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."²

The proposed demolition of the Domestic Science Building and the North Annex would reduce the contributing structures in the Jordan High School Campus historic district from five to three, and jeopardize the district's continued eligibility for listing in the National Register of Historic Places. While the Draft EIR concludes that the loss of the altered, less ornate, and less visible North Annex may not result in an adverse impact under CEQA, the demolition of the Domestic Science Building would be an unavoidable significant adverse impact. Additionally, the loss of historic resources on the Jordan High School campus would contribute to the cumulative loss of

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

campuses in LAUSD with historic resources. Proposed mitigation for documentation and salvage of historic features in the event of demolition fail to adequately reduce the significant impacts directly associated with the loss of these historic buildings.

III. Feasible Preservation Alternatives and Mitigation Measures Exists that Avoids or Substantially Lessen Significant Adverse Impacts on Historic Resources

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.³ 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.”⁴ 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.⁵

The Draft EIR evaluated two feasible preservation alternatives that meet most of the project objectives. Under Alternative 2, no historic building would be demolished, and only the North Annex would be demolished in Alternative 3. Both alternatives avoid significant impacts to historic resources and appear to retain the eligibility of the National Register district. In addition, Alternative 2 would result in the same number of classrooms and cost less under the Option 2 scenario as the proposed project, and is the environmentally superior alternative.

While Alternative 2 and Alternative 3 may not address all of the project objectives to the same extent as the proposed project, the Draft EIR fails to conclude that they are infeasible. Emergency access under Alternative 2 can be accomplished through alternative means, such as multiple entries to different areas of campus and regular briefings with the local emergency responders to familiarize them with the campus layout. The 1960s classroom building could be retained, or larger new classroom buildings constructed to accommodate more classrooms under Alternative 3. For both, the claim that seismically retrofitting the historic buildings would render them “not as strong as a new building,” is vague and unsubstantiated. The California State Historic Building Code has long been in effect offering code flexibility to seismically retrofit historic buildings to meet the performance requirements of current building codes without sacrificing historic integrity.

a. Additional alternatives and mitigation should be fully considered and incorporated in the Final EIR

As the proposed project replaces the Domestic Science Building with a similar classroom building in approximately the same footprint, the Final EIR should also evaluate a modified project alternative that retains the Domestic Science Building while constructing a new SLC East structure and renovating the 1960s-era classroom building as proposed. An addition or stand-alone building connected via a loggia or bridge to its north elevation can be incorporated to the Domestic Science Building for added classroom space, elevator or lift access, and ADA

³ *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.

⁴ PRC § 21002.1.

⁵ PRC § 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185).

compliance. This addition or wing may be in place of, or adjacent to, the one-story section of the Domestic Science Building, with limited renovation of the historic building that is within the budget and minimal scope of the Option 2 scenario. Such an alternative would achieve most of the project objectives and maintain the historic street frontage of Jordan High School.

To avoid other significant impacts associated with the proposed project, planned renovations for the other historic resources on campus, such as the Administration Building, loggia, Girl's Gym, and in the future, the Auditorium, should adhere to the *Secretary of the Interior's Standards for Rehabilitation*.

Thank you for the opportunity to comment on the Draft EIR for the Jordan High School Redevelopment Project. We look forward to working with LAUSD on this and other historic campuses throughout the district in the future. Please feel free to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy