May 24, 2011

Centinela Valley Union High School District
Board of Education
District Board Room
14901 S. Inglewood Avenue
Lawndale, CA 90260

Re: Item #15, Public Comments on Non-Agenda Items: Centinela Valley Union High School District Should Prepare EIR for Leuzinger High School Master Plan

Dear Members of the Centinela Valley Union High School District:

On behalf of the Los Angeles Conservancy, I am writing regarding the Leuzinger High School campus and the ongoing Phase 1 and Phase 2 construction projects. Leuzinger is an historical resource and, as such, requires full environmental review, including an environmental impact report and historical analysis prior to commencing with work or continued demolition of buildings that adversely impact the campus’ historic integrity.

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

Based on the architectural and cultural significance of the Leuzinger High School campus, we urge the Centinela Valley Union High School District to consider the campus a historical resource under the California Environmental Quality Act (CEQA) and prepare an environmental impact report -- prior to any further demolition -- to identify all historic resources as well as evaluate feasible alternatives to their demolition.

I. Historic Significance of Leuzinger High School

While not every older school campus is historic, the Conservancy does believe the Leuzinger High School campus is significant and should be properly evaluated. Through reuse and reinvestment in the existing buildings, Leuzinger, like many other historic schools, can continue to meet the needs of students, and the community while also providing high-performing facilities.

Leuzinger High School opened in 1930 and is the oldest of the three high schools that comprise the Centinela Valley Union High School District. In addition to Leuzinger High’s cultural
association with the 1932 Olympics, several of the buildings on the campus are architecturally
distinct and represent the different periods in which they were built over the first quarter century
of the high school’s development.

Campus buildings such as the Main Building and the Girls’ Gymnasium were designed by noted
architect T. C. Kistner, who established the architecture firm Kistner, Wright & Wright in 1911.
Kistner was a Los Angeles- and San Diego-based architect who designed numerous schools,
public buildings and military bases throughout southern California. He designed schools in San
Diego, Orange, Los Angeles, Ventura and Santa Barbara Counties. He also planned El Toro,
Goleta, El Centro, and Mojave Marine Corps. air stations.

The Moderne style Girls’ Gymnasium is also significant for its association as a PWA project
completed in 1936. The Public Works Administration, a large-scale public works construction
agency established as part of the New Deal in 1933, was responsible for the construction of a
number of projects nationwide, including schools, hospitals, courthouses, bridges and electricity-
generating dams. The Gymnasium is the only example of classical moderne architecture on the
Leuzinger High campus.

Postwar prosperity brought a significant expansion to the Leuzinger High campus with the Late
Moderne remodel of the Main Building and the construction of numerous buildings including
several one-story “finger” classroom buildings, a cafeteria building, a boys’ gymnasium, and a
music building, among others. The finger buildings represent another important stage in the
development of Leuzinger High, with a distinct building type that became popular at primary and
secondary schools throughout southern California that were designed specifically for the region’s
climate. Typical features of this building type include expansive use of windows on north and
east facing elevations for bright but indirect natural lighting, while west and south facing
elevations often feature smaller windows and louvers or canopies to shield the building’s from
the sun’s heat and glare. Integrated canopies that cover walkways alongside the buildings shield
students and faculty from the weather.

As a collection of buildings, the Leuzinger High School campus represents several layers of
historical development and may be eligible as a potential California Register historic district.
However, the cumulative loss of buildings from the campus’ early years of development will
continue to compromise the historic integrity of Leuzinger High School.

II. Regulatory Framework

a. California Environmental Quality Act

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

1 Public Resource Code §21001 (b), (c).
significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.\textsuperscript{2}

Courts often refer to the environmental impact report (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 or avoid those impacts.\textsuperscript{3} CEQA Guidelines require a range of alternatives to be considered in the EIR, with an emphasis on options capable of "substantially lessening" the project's significant adverse environmental effects.

"Since the preparation of the EIR is the key to environmental protection under CEQA," an EIR is required "whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact."\textsuperscript{4} The "fair argument" test "establishes a low threshold for initial preparation of an EIR, which reflects a preference for resolving doubts in favor of environmental review."\textsuperscript{5} Evidence supporting a fair argument of a significant environmental impact will trigger an EIR even if the record contains contrary evidence.\textsuperscript{6}

\textbf{b. Projected Master Plan improvement projects cannot be segmented; must be evaluated in their entirety for proper identification of adverse impacts and consideration of alternatives}

The Conservancy shares the concern of several members in the local community that numerous buildings at Leuzinger High School are planned for demolition as part of the school district's multi-phased Master Plan for campus upgrades. A \textit{Daily Breeze} article from October 23, 2010 states that "about three-quarters of Leuzinger High would be torn down and rebuilt."\textsuperscript{7} To date, the school's Industrial Arts Building has been demolished as part of Phase 1, while the campus' seven single-story classroom "finger" buildings are currently scheduled for demolition next month as part of Phase II.

Under CEQA Guidelines Section 15378, a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." A public agency cannot subdivide a single project into smaller individual sub-projects in order to avoid the responsibility of considering the environmental impact of the project as a whole.\textsuperscript{8}

\textsuperscript{2} Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41; also see PRC §§ 21002, 21002.1.
\textsuperscript{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.
\textsuperscript{4} No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 75; see also Architectural Heritage Association v. County of Monterey (2004) 122 Cal.App.4th 1095. "Substantial evidence" includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Inaccurate information and unsubstantiated opinion are not substantial evidence. PRC §21082.2(c); Guidelines §15384.
\textsuperscript{8} Orinda Assn. v. Board of Supervisors (1986) 182 Cal.App.3d 1145, 1171.
III. Conclusion

CEQA review has proven to be an effective tool for communities to identify the full impacts of proposed projects on historic resources, while also considering preservation alternatives that can address project objectives. In projects across Los Angeles and throughout California, CEQA has been instrumental in helping agencies and the public to work together to avoid significant impacts on the environment. With regard to the Leuzinger High School campus, there is likely ample opportunity for many of the campus' original buildings to be sensitively upgraded and adaptively reused for new purposes. Additionally, undeveloped portions of the campus can be examined for their potential as sites for new construction.

Given the significance of the Leuzinger High School campus, we strongly urge the Centinela Valley Union High School District to treat the campus as an historical resource under CEQA and – prior to any further demolition -- prepare an EIR for the campus Master Plan project. According to the District’s Measure CV Program Update, dated April 26, 2011, the timeline for the Phase 2 project was just recently initiated, with construction not anticipated until May of 2012. Any immediate plans for demolition of the finger buildings should not proceed without an EIR first being initiated.

Historic school buildings and campuses provide a place to educate our children that also serve as important anchors that help define and sustain our communities. We believe this is a fitting description for the Leuzinger High School campus.

Thank you for the opportunity to comment and share our concerns regarding the ongoing development of Leuzinger High School campus. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: Lawndale City Council
    Save Leuzinger’s Legacy

Enclosure
Inglewood Gym and Pool Listed

Los Angeles Times

Inglewood Gym and Pool Listed

A one-story gymnasium with swimming pool is to be built at the Leushner High School site, Inglewood, and bids for its construction are to be received until July 28 by the Inglewood Union High School District. It is a P.W.A. project and will cost approximately $125,000. T. C. Kistner is the architect.

Large Orange Crop Increase Seen Indicated

Central California will produce the largest navel orange crop in its history this fall, according to predictions of shipping officials and growers. The crop is expected to exceed the all-time record of 11.72 cars in 1924, and in opinion of many will go to 13,000 cars. This prediction is based on good growth of the fruit and minimum drop.

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T. C. Kistner, Retired Architect, Dies at 99

By Lawrence A. Kerwin

Retired architect Theodore Charles Kistner, designer of scores of schools, public buildings and military bases in Southern California, died Monday in San Diego at the age of 99, his family disclosed Wednesday.

There will be no funeral services for Mr. Kistner, who retired in 1965 from Kistner, Wright & Wright, a firm he established in San Diego in 1911. He had opened a Los Angeles office in 1923.

Mr. Kistner, an 1897 graduate of the University of Illinois, had designed schools for districts in San Diego, Los Angeles, Orange, San Bernardino and Ventura counties. He had also planned El Toro, Goleta, El Centro and Marine Corps air stations.

He leaves his wife, Alice; a son, Theodore Jr., and three daughters, Lucile, Constance and Katherine.