December 1, 2008

Submitted via fax and mail
Julie Boucher, Assistant Superintendent, Business Services
San Marino Unified School District
1665 West Drive
San Marino, CA 91108
Fax: 626.299.7010

RE: Notice of Preparation—San Marino High School Pool Expansion—Michael White Adobe

Dear Ms. Boucher:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) of an environmental impact report for the San Marino High School Pool Expansion project. The Conservancy is the countywide historic preservation organization for the Los Angeles area and is the largest local historic preservation organization in the United States, with over 7,000 household members. The proposed pool expansion project seeks to relocate or demolish the 163-year-old Michael White Adobe, the second oldest structure in San Marino and one of a handful of 19th century adobes remaining in the region. As part of the city’s scoping process for the Draft Environmental Impact Report (DEIR), we submit the following comments to ensure fair and thorough consideration of less harmful alternatives.

Historic Significance of the Michael White Adobe

Constructed around 1845, the history and significance of the Michael White Adobe, also known as the Blanco Adobe, is well documented. Michael White was an English sailor with a sense of adventure, having embarked on a number of sea voyages before arriving in California in 1829. Because California was under Mexican rule at the time, White adopted the name Miguel Blanco and became a Mexican citizen in order to marry and own land. Soon after marrying Maria del Rosaria Guillien, the daughter of an influential figure at San Gabriel Mission, White received a land grant of about 77 acres north of the San Gabriel Mission, where the adobe still stands today. Reflecting Spanish colonial architectural influences and constructed by indigenous labor, the Michael White Adobe was similar to many other dwellings that once dotted former mission lands granted to private citizens under the Mexican government’s Secularization Act of 1834.¹

Remarkably, as one of the earliest foreign settlers in California, the Bancroft Library conducted an oral history interview with White in 1877 that chronicled his personal travels as well as many significant historic events and prominent figures from the Mexican era and early United States history of California. As documented in the interview, White and his family continued to live in the adobe for many years after California was annexed by the United States in 1846. Over time, the ranch was parceled off to White’s children as they wed and had families of their own, and the adobe was eventually sold to a neighbor.

In 1928, the San Marino School District acquired the adobe and its remaining land for construction of a future school. The adobe was leased to a family for years before construction of an elementary school started on the property after World War II. San Marino High School relocated to the site in the mid-1950s and constructed the pool and athletic facilities that currently envelop the then 100-plus year old structure.

The Michael White Adobe is locally designated as a San Marino landmark and has been deemed eligible for the National Register of Historic Places. As an indication of exceptional significance, the adobe was among the first buildings to be documented under the federal Historic American Building Survey (HABS) in 1935, not long after the program was established in 1933, and remains the only HABS-documented structure in San Marino today. The White Adobe is also featured in John R. Kielbasas’s book Historic Adobes of Los Angeles County.

**Suggested Alternatives for Consideration in the EIR**

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.” 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.” In other words, if less harmful alternatives are identified in the EIR that meet most project objectives, the lead agency should not approve the proposed project.

As described in the NOP, the proposed project would either adversely impact or destroy an irreplaceable and exceptionally rare historic resource through relocation or demolition, even

---

2 White’s interview with Thomas Savage, California All the Way Back to 1828, is available online at the Library of Congress’s collection of first person narratives from California’s early years, 1849-1900, entitled “California as I Saw It.”

3 “Casa de Miguel Blanco,” available at the Library of Congress website, www.loc.gov. A later wood-framed two-story wing with wooden ship siding seen in the HABS documentation has since been removed and only the earlier adobe section remains.

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

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

6 “The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” Citizens of Goleta Valley v. Board of Supervisors (1998) 197 Cal.App.3d 1167, 1181.
though funds have yet to be secured for the desired pool expansion. Given the significance of the Michael White Adobe, the Conservancy strongly feels that demolition should not be considered under any circumstances. Likewise, we believe that any discussion of moving the adobe is premature until funds have been secured to pay for both relocation of the adobe and the pool expansion project. Accordingly, we propose the following alternatives for consideration in the Draft EIR:

- **Retention in Place:** The Draft EIR should prioritize an alternative that would retain the adobe in place, as part of either Scenario B or Scenario C described in the NOP. Under these options, a new pool would be developed where the basketball courts are currently located, while the existing pool would be filled in and replaced with two full basketball courts. An alternative that retains the White Adobe in place and allows basketball court(s) to be built around the adobe would significantly reduce or eliminate adverse impacts to cultural resources.

- **Restoration of the Michael White Adobe and its Setting:** As San Marino High School was developed around the White Adobe, the setting and relationship of the adobe to the landscape was severely compromised. Restoration of the adobe and its setting based on historic research and documentation, in compliance with the Secretary of the Interior’s Standards, would transform the adobe into a community centerpiece for interpretation and enjoyment by students and residents alike. The adobe’s on-campus location provides a unique, hands-on educational opportunity that could be integrated into the district’s curriculum on California history and engage high school students in volunteer opportunities.

- **Relocation and Restoration:** The Draft EIR should explore the feasibility of relocating the adobe only as a last resort. Relocation is not an ideal preservation solution for any building, but particularly in this situation, where this type of move is called “risky” in the conservation options report drafted by structural engineers Melvyn Green and Associates. Relocation may potentially jeopardize the adobe’s structural stability and historic fabric, as well as its eligibility for the National Register. Such a drastic measure must be predicated on securing an appropriate destination site and sufficient funds (committed by the school district) to pay for relocation, stabilization and restoration of the adobe. In considering relocation alternatives, the EIR should also take into account potential adverse impacts on archaeological resources and prescribe appropriate mitigation measures.

The Michael White Adobe is an exceptionally rare historic resource that is a treasure not only for the San Marino School District, but for Southern California. Its location on a high school campus offers an unparalleled opportunity to further the district’s educational mission and teach early California history through a tangible, authentic artifact. We urge the school district to embrace this remarkable teaching tool and seek alternatives that retain and preserve the Michael White Adobe as a legacy of San Marino’s past.
Thank you for the opportunity to comment on the Notice of Preparation for the San Marino High School Pool Expansion project. Please feel free to contact me at (213) 430-4211 or fchou@laconservancy.org should you have any questions.

Sincerely,

[Signature]

Flora Chou
Preservation Advocate