



August 23, 2011

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

Re: Item L, Reaffirm or Rescind Determination that Leuzinger High School Measure CV Classroom Facilities Project is Categorically Exempt

Dear Centinela Valley Union High School District Board members:

On behalf of the Los Angeles Conservancy, we submit these comments on the historic significance of the Leuzinger High School campus and the need for a full environmental impact report prior to continued demolition of campus buildings that would 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 strongly urge the Centinela Valley Union High School District to consider the campus a historical resource under the California Environmental Quality Act (CEQA). A historic assessment and survey should be prepared as part of an environmental impact report -- prior to any further demolition -- to identify historic resources as well as evaluate feasible alternatives to their demolition.

I. Substantial evidence supports a fair argument that the Leuzinger High School Master Plan Update will cause a substantial adverse change to a historical resource, requiring preparation of an environmental impact report

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

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

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

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.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.”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*.”⁵ Evidence supporting a fair argument of a significant environmental impact will trigger an EIR even if the record contains contrary evidence.⁶

As applied to the Leuzinger High School Master Plan Update, even if the Centinela Valley Union High School District’s unsupported finding of “no impact” on historical resources were accepted on faith alone, an EIR is nonetheless required given evidence in the record establishing the significance of the Leuzinger High School campus.

A. Based on its architectural and cultural significance, the Leuzinger High School campus qualifies as a “historical resource” under CEQA

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.

Some 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

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 *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.

⁵ *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th at 703.

⁶ *League for the Protection of Oakland’s Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 904-05; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 310.

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 PWA 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 PWA 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 (recently demolished), a cafeteria building, a boys gymnasium, and a music building, among others.

In our opinion, as a collection of buildings the Leuzinger High School campus represents several important layers of historical development which we believe is eligible as a California Register historic district. Additionally, based on further research, individual buildings may also be eligible for listing in the California Register, including the Administration Building and the Girls' Gymnasium. However, the cumulative loss of buildings from the campus' early years of development will continue to compromise the historic integrity of Leuzinger High and ultimately its eligibility as an historical resource.

II. 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 the local advocacy groups Save Leuzinger's Legacy and Friends and Alumni of Leuzinger High School, in addition to the City Councils of Lawndale and Hawthorn that numerous buildings at Leuzinger High School have been demolished or are planned for demolition as part of the school district's multi-phased Master Plan for campus upgrades. A *Daily Breeze* article from October 23, 2010 states that "about three-quarters of Leuzinger High would be torn down and rebuilt."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 were demolished in July and August 2011 as part of Phase II, despite significant public outcry.

Based on the Phase II project, a new cafeteria building will be constructed and presumably, based on the current pattern, the historic cafeteria will be demolished. Any demolition of this building should not proceed until an Environmental Impact Report has been prepared and reuse options are thoroughly evaluated.

Under CEQA Guidelines Section 15378, "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

⁷ Morino, Douglas. "Lawndale leaders question school bond." *Daily Breeze*. Oct. 23, 2010.

subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole.⁸

A review of the Leuzinger High School Master Plan Update reveals a project comprised of five successive phases of development which proposes the demolition or alteration of several of the historic buildings on the campus. Several buildings on campus, including the Industrial Arts Building and all seven of the finger buildings, have been demolished as part of Phases 1 and 2.

The Cafeteria Building (Building 18) appears to be impacted by the implementation of Phase 2, as its use will be replaced by the construction of a new cafeteria building elsewhere on campus. The potential reuse of the Building 18 has not been evaluated as part of the Master Plan Update.

Phases 3 through 5 also indicate proposed work that may further impact historic buildings on campus. These include the proposed demolition of the Girls' Gymnasium (Building 20), a PWA project and the campus' only example of PWA Moderne architecture, and the proposed façade restoration of the Main Building (Building 1), which, while well-intentioned, would result in the loss of the 1954 façade that may have gained architectural significance. Additionally, proposed modernizations of the Music Building (Building 23) and Boys' Gymnasium (Building 24) may have adverse impacts to these historic resources without property evaluation.

III. Conclusion

CEQA review has proven to be an effective tool for communities to identify the full impacts 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 to 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.

⁸ *Orinda Assn. v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.

Thank you for the opportunity to comment on the ongoing development of Leuzinger High School campus.

As Exhibit A, attached are a series of current and historic images of the Leuzinger High School campus. In addition, attached is the CV for Adrian Scott Fine, demonstrating my credentials in historic preservation and evaluating historical resources.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Adrian Scott Fine". The signature is fluid and cursive, with the first name being the most prominent.

Adrian Scott Fine
Director of Advocacy

Attachment(s):

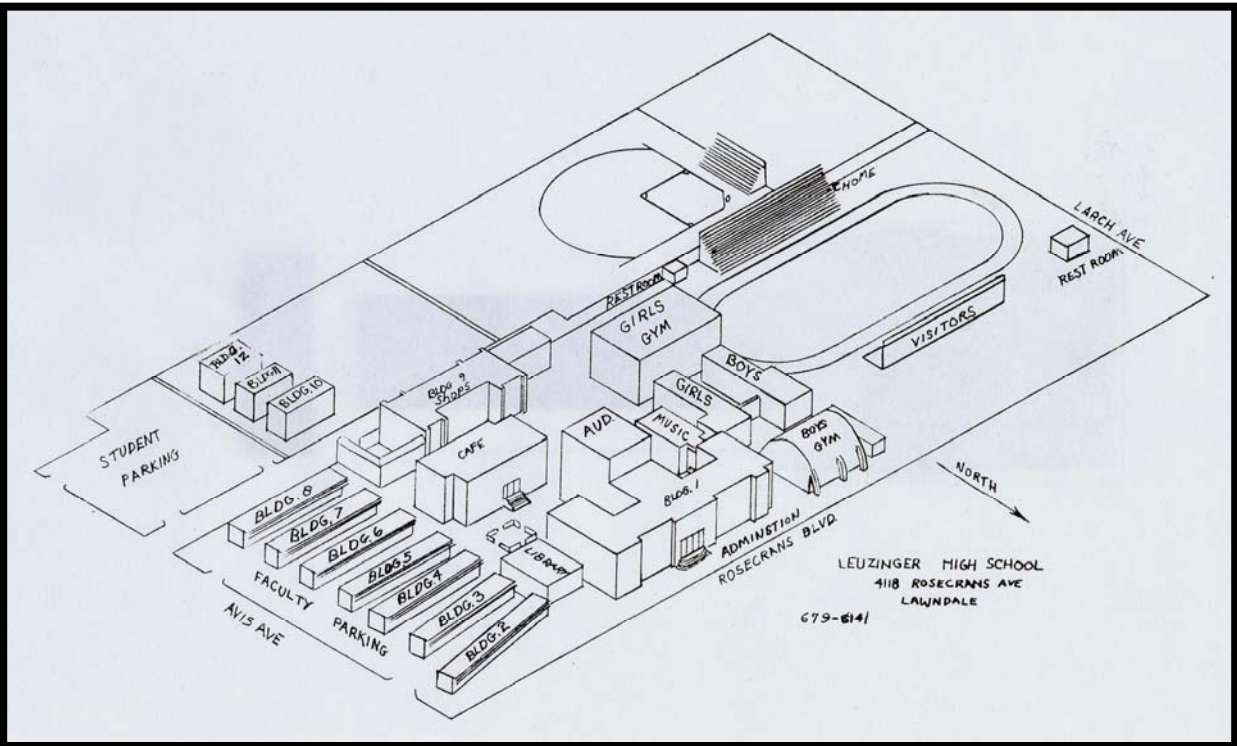
Exhibit A: Images of Leuzinger High School
CV, Adrian Scott Fine

cc: Lawndale City Council
Save Leuzinger's Legacy
Friends and Alumni of Leuzinger High School

Exhibit A: Leuzinger High School



(TOP) Historic aerial view of Leuzinger High School Campus, ca 1966. (BELOW) 1960s campus layout.





(TOP) Main Administration Building in the 1930s, and in 2011 (BELOW)



(TOP) 1930s Girls' Gymnasium. (BELOW) 1940s and 50s "finger" buildings on campus, demolished July/August, 2011

