

## **Independent Analysis of Studies of Historic Resources on the Samohi Campus**

*The Santa Monica Conservancy recently became aware of past historic resource assessments prepared for the SMMUSD in connection with future campus development. In view of the importance of Samohi to our community, we suggest that consideration be given to an alternative development approach that incorporates significant historic buildings on the campus. Rehabilitation rather than demolition should be considered for certain buildings.*

### **A Potential Historic District Exists on Prospect Hill**

The Historic Core of the Santa Monica High School Campus constitutes a historic grouping that could become part of the Facilities Master Plan upgrades. The core consists of the English (1924/1937), History (1913/1937), Art (1937), Business (1913/1937) and Business Annex (1940) Buildings, which all retain their original 1913 location, WPA architectural character, and orientation atop Prospect Hill. By retaining the historic academic core of the campus, an opportunity to restore the original quad area as an open space connection to the landmarked Barnum Hall and historic Greek Theater presents itself, enhancing rather than undermining the historic context of those two acknowledged, major historic resources.

Two research reports commissioned by SMMUSD since 2008 present evidence of high significance for the numerous WPA buildings and art works all over the school district, but most significantly at Samohi, which has the greatest concentration of them in the City of Santa Monica. Because of later alterations, the EIR evaluated those resources as below the threshold for historic integrity, even though some of those changes are significant in themselves. Also, the EIR dismissed Samohi's eligibility as a potential historic district by looking at too large a grouping. The EIR did not consider the potential for a smaller district within the campus that would include only the cohesive cluster of PWA and WPA resources at the top of Prospect Hill. Most importantly, *the EIR failed to consult with Historic Organizations*, so we were not advised; normally, our organization responds to such studies.<sup>1</sup>

### **The First Historic Assessment of SMMUSD for an Aborted Program EIR**

In November 2008, a detailed Historic Resources Assessment covering all seventeen school sites in the SMMUSD was published at the working draft stage. It had been commissioned by the district in July 2007 using Measure BB funds, which had just made a district-wide Facilities Master Planning process a reality. The SMMUSD Board of Education awarded a \$477,630

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<sup>1</sup> *Samohi Campus Plan Project, Draft Environmental Impact Report*, Chapter 3.3: Cultural Resources, Historic Resources Group, November 2018, (pp 3.3-51)

contract to PCR Services Corporation to undertake the study as part of a Program Environmental Impact Report for the Facilities Master Plan, in order to identify and protect historic resources as the district moved through the facilities upgrade projects.<sup>2</sup>

*The goal of this Historic Resources Evaluation Report (HRER) is to present the results of a comprehensive survey of District facilities while also identifying preservation practices to help reduce and avoid significant impacts on historic resources associated with improvements proposed under Measure BB. More specifically, this HRER was prepared to accomplish three basic objectives: 1) to comprehensively survey and evaluate the schools within the District for their eligibility as historical resources at the federal, state and local level; 2) to provide a preliminary assessment of potential impacts to identified historical resources under the California Environmental Quality Act (CEQA); and 3) to provide recommendations and guidance for the treatment and preservation of the District's historic resources.<sup>3</sup>*

PCRs draft report found the Samohi campus as a whole had historic significance across three different phases. The first began in 1912-1913 when the High School was first established. Its magnificent architecture at the top of Prospect Hill was to symbolize the pride and promise of the growing city. But the Long Beach earthquake in 1933 was so devastating to the city's schools, that not a single campus escaped unscathed. At the height of the Great Depression, the city turned to the federal government for assistance that resulted in PWA and WPA repair, reconstruction, and expansion on virtually every school campus in the city at the time.<sup>4</sup> This reconstruction marked a second phase, what the PCR report refers to as "The Golden Age of Schools in Santa Monica," where old and new buildings alike represented the Art Moderne and Streamline Moderne architectural styles preferred by the PWA.<sup>5</sup> The last phase recognized in the report was a post-WWII era of open plan Modern and International Style school construction reflected in the new area of the Samohi campus after it expanded to the north, doubling its size, in 1952. The PCR report found that the Santa Monica High School campus as a whole appeared eligible for the California Register, and that the English and History Buildings,

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<sup>2</sup> *Award of California Environmental Quality Act (CEQA) and Program-Level Environmental Impact Report (EIR) to PCR Services Corporation, Recommendation No. A.20, SMMUSD Board of Education, Meeting Minutes, July 12, 2007*

<sup>3</sup> *Historic Resources Evaluation Report Santa Monica-Malibu Unified School District, Preliminary Working Draft – Work in Progress, PCR Services Corporation, November 2008*

<sup>4</sup> The Public Works Administration (PWA) and Work Projects Administration (WPA) were New Deal programs created under the National Recovery Act to assist in economic recovery from the Great Depression. The programs put Americans back to work rebuilding public resources and creating public art in towns and cities across the United States.

<sup>5</sup> *PWA Moderne style* evolved in California after the 1933 earthquake when "The Field Bill," responded with the first seismic standards for construction. All concrete construction reinforced with steel was required. Veneers, projecting cornices, and loose ornamental features were prohibited. These requirements were applied to the Art Deco and Streamline Moderne styles popular at the time, which could be effectively accomplished in concrete, resulting in the unique, now familiar look of PWA structures in California.

as well as the Greek Theater and the already landmarked Barnum Hall appear to be individually eligible for designation. Following is PCR's concluding statement:

*The period of significance for Santa Monica High is from the completion of the school in 1912 through 1960, which marks the end of the modernization period for this school. Santa Monica High is associated with several themes including community development in Santa Monica, the Golden Age of Schools in Santa Monica, and Modern Era Schools. It is also architecturally significant for some of its individual buildings and as an entire campus that embodies the distinctive characteristics of the architecture and planning from both the pre-earthquake period and the post-earthquake period of the Golden Age of Schools in Santa Monica. Finally, it is an important work of the master architects, Allison and Allison, and the master architects Marsh, Smith and Powell, with additions by the notable Santa Monica architects Frederic Barienbrock and Andrew F. Murray, and master landscape architects Eckbo, Royston and Williams. While the campus has been extensively modified over the years it still retains sufficient integrity to convey its historical associations with community development in Santa Monica. Its architecture retains sufficient integrity to convey its significance in association with the Golden Age of Schools in Santa Monica as a significant distinguishable entity whose components may lack individual distinction (campus group), and individual buildings on the campus are also of sufficient historic or architectural merit to rise to the threshold of eligibility as individual resources, such as Barnum Hall which is a designated City Landmark, the Academic Building (History Building), the Library and Classroom Building (English Building), and the Memorial Theater (Greek Theater). Thus, Santa Monica High School appears to be eligible for the California Register under Criterion 1 for its association with events that have made a significant contribution to District history and the broad patterns of history and culture in Santa Monica and the Southern California region, and under Criterion 3 as a distinctive campus grouping that conveys the significant architectural associations and characteristics of pre-earthquake planning, post-earthquake school architecture and planning, and Modern planning and design. Pursuant to CEQA, Santa Monica High School appears eligible for the California Register as an individual property through survey evaluation, with a California Resources Historical Status Code of 3CS. Santa Monica High School also appears locally significant both individually and as a contributor to a district that appears eligible through survey evaluation, and is assigned a California Resource Historical Status Code of 5B.<sup>6</sup>*

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<sup>6</sup> *Historic Resources Evaluation Report Santa Monica-Malibu Unified School District, Preliminary Working Draft – Work in Progress, PCR Services Corporation, November 2008*

But a Program EIR was not meant to be for the Facilities Master Plan. The PCR report was shelved, and the EIR that was finally completed in time for phase three of the Samohi project, focusing only on that scope, engaged a different historic preservation consulting company.<sup>7</sup>

### **The EIR Historic Assessment of Santa Monica High School**

In September 2016, a second historic preservation consulting firm, Historic Resources Group (HRG), was hired for work on a more limited scope EIR for the Santa Monica High School Campus Plan. The Samohi Project was moving into Phase 3, which includes the demolition of the History, Art, and Business, and Business Annex Buildings, massive alterations to the English Building, and the potential leveling and removal of the peak of Prospect Hill itself.

The HRG report was consistent with PCR regarding the first and second phases of development related to the construction of the campus, concluding that the period greatest significance was from 1913-1944.<sup>8</sup> HRG added enthusiastic detail to the groundwork already laid on the significance of the post-earthquake, Great Depression era of PWA and WPA reconstruction of the campus.

The report touches on how the PWA and WPA funded many notable structures in the city, noting the landmark City Hall as an example. For the schools, a federal allocation of \$1,500,000 and voter-approved bonds of \$290,000 and \$250,000 went into the repairs. “By far the largest project would be the complete rehabilitation and modernization of Santa Monica High School.”<sup>9</sup> Five buildings were repaired, and three new buildings were added to Samohi. The repaired buildings were reinforced with steel and concrete according to new post-earthquake standards. The well-known architectural firm Marsh, Smith & Powell, the go-to experts in schools and churches in Los Angeles for decades, did much of the work.

*Santa Monica High School has the distinction of being home of the highest concentration of WPA projects in the city. In addition to the rehabilitation and new construction of campus buildings, the WPA was also responsible for a number of standalone art pieces. . . . By the end of the 1930s, the Santa Monica High School campus had been reconstructed, seismically strengthened, and expanded with new facilities. It was this post-earthquake period of development that signified the real completion of the high school.<sup>10</sup>*

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<sup>7</sup> This approach meant historic assessments of other campuses were never completed even though the report revealed many of the school sites in the district had them. An EIR that formalized such a finding would mean adopting new practices for stewardship of historic buildings. The district-wide Historic Assessment was shelved.

<sup>8</sup> During phases 1 & 2 of the Samohi project, resources from the third period had been demolished so they did not figure in the HRG assessment.

<sup>9</sup> *Santa Monica High School Campus Plan Historic Resources Technical Report*, Historic Resources Group, July 2018

<sup>10</sup> *Santa Monica High School Campus Plan Historic Resources Technical Report*, Historic Resources Group, July 2018

Santa Monica High School is virtually a PWA and WPA museum, and the concentration of resources that embody that significance citywide and beyond, marks a key moment in the history of the high school and the school district. The following list of buildings and features from the period of significance were listed in the EIR assessment.

### ***Buildings***

*Academic & Administration Building (now the History Building), 1913*  
*Manual Arts & Commerce Building (now the Business Building), 1913*  
*Santa Monica Memorial Open Air Theater (Greek Amphitheater), 1921*  
*Library/Student Center (now English/Humanities Building), 1924*  
*Art Wing (now Art Building), 1937*  
*Auditorium (now Barnum Hall), 1938*  
*Boys' Gymnasium (now North Gym), 1938*  
*History Building Annex, c. 1940*

### ***Site Features***

*Athletic Field (now Football Field/Track), c. 1913*  
*Main Quad, c. 1913*  
*Senior Bench Park, c. 1913*

### ***Additional Features***

*Owl Statue, 1913*  
*Brick wall, 1913*  
*"Westward II" Mural, 1935*  
*"Santa Monica High School" Sign, 1937*  
*"Comedy, Tragedy, Music" Relief, 1937*  
*"Senior Bench," 1937*  
*"The Viking" Fountain Sculpture, 1937*  
*"Workers" Relief, 1937*  
*"Entrance of the Gods into Valhalla" Mural, 1938*  
*"Landing of the Vikings in Vinland" Mosaic, 1939*<sup>11</sup>

Between when the PCR report was written in 2008 and the HRG report was contracted in 2017, the City of Santa Monica completed an update of its Historic Resources Inventory.<sup>12</sup> The 2010 update, created by a third historic preservation consulting firm, ICF Jones & Stokes, added Samohi to a potential thematic Santa Monica Public Schools Historic District identified in 1993, and noted that some Moderne style buildings on the campus associated with noted architects

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<sup>11</sup> *Santa Monica High School Campus Plan Historic Resources Technical Report*, Historic Resources Group, July 2018

<sup>12</sup> The city created its first Historic Resources Inventory (HRI) in 1984. As a Certified Local Government, the city is required to update the HRI every five years. Schools were first recognized in the second survey in 1993, which covered areas missed the first time around. The next updates were conducted in 2010, and 2018.

could be considered for individual designation.<sup>13, 14</sup> HRG ultimately agreed with both previous consultants on the overall significance of the Samohi Campus.

*Santa Monica High School is significant under NRHP Criterion A and CRHR Criterion 1 within the context of the development of schools in Santa Monica, as well as the civic development of Santa Monica more generally. Santa Monica High School was constructed as the city's first dedicated high school campus. For the first six decades of its existence, it was the city's only high school, and it remains the city's main high school today. Over its more than 100-year history, generations of Santa Monica residents have spent their high school years on this campus. Additionally, Santa Monica High School has long played an important role in the larger community. For many decades, the high school and its various facilities were utilized by Santa Monica residents generally. Most notably, the Greek Amphitheater and Barnum Hall served as the city's primary outdoor and indoor civic gathering spaces, respectively, into the 1950s. Thus, Santa Monica High School has been a prominent institution in the City of Santa Monica for over a century.*

*The period of significance for Santa Monica High School extends from 1913 to 1944. This timeframe includes the original period of development for the campus, the substantial changes to the campus which took place following the Long Beach Earthquake, and the impact of the Works Progress Administration on the campus.<sup>15</sup>*

As noted, HRG assessed the post-WWII campus expansion period as not significant, stating that the “period of post-earthquake and WPA renovation and new construction represents the completion of the Santa Monica High School campus as originally planned.” HRG notes that “five of the original buildings were retrofitted and remodeled, resulting in ‘earthquake-resistive construction’ and transforming the campus architecture to the PWA Moderne style.”

In spite of so much significance, the possibility of a Historic District on the Santa Monica High School campus was dismissed out of hand on a purely quantitative basis because of all nineteen buildings on the campus, only eight, 42% were from the period of significance, and some of the historic structures were separated from the others by post-war infill. This infill is what separates the gymnasiums and Greek Theater from the Prospect Hill structures, which are clustered together. HRG determined the campus did not comprise a sufficient “historic core” for a historic district. The report, by looking broadly at the entire south half of the campus from Seventh to Fourth Streets as a potential historic district, also faulted the post-war infill with compromising the historic quad on the campus, and disrupting the historic context of individual

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<sup>13</sup> *Santa Monica Citywide Historic Resources Inventory Update Final Report*, ICF Jones & Stokes, November 2010

<sup>14</sup> In 1993 Leslie Heumann & Associates conducted the City's HRI update and found that five sites contributed to a potential non-contiguous historic district of schools. Samohi was not one of them, though it was indicated that there may be other resources or contributors in the school district.

<sup>15</sup> *Santa Monica High School Campus Plan Historic Resources Technical Report*, Historic Resources Group, July 2018

original buildings as well. However, by never investigating the smaller, hilltop cluster of historic academic and administrative structures as a smaller district, the analysis did not consider the most significant aspect of the original context of Samohi: the location on the top of Prospect Hill. The designated landmark Barnum Hall and the Greek Theater were found to be individual historic resources independent of consideration of any historic districts or clusters on campus.

Both PCR and HRG agree that the History and English buildings are individually significant under state and national criteria. HRG states it this way:

*The History Building is significant under NRHP Criterion A and CRHR Criterion 1. Originally constructed in 1913 as the Academic & Administration Building, it was the most functionally important and visually prominent building on the Santa Monica High School campus. The period of significance is 1913-1944, which includes its original period of development, through the evolution of the campus following the Long Beach Earthquake and the impact of the Works Progress Administration.*

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*The English/Humanities Building is significant under NRHP Criterion A and CRHR Criterion 1. Originally constructed in 1924 as the Library/Student Center, it was one of the most publicly visible buildings on the campus, and played an important role in the daily activities of Santa Monica High School students. The period of significance is 1924-1944, which includes its original period of development, through the evolution of the campus following the Long Beach Earthquake and the impact of the Works Progress Administration.*

But in both cases HRG dismisses the buildings as potential individual historic resources because of modifications that impact their historic integrity.<sup>16</sup> The history building has lost an auditorium wing and a semi-enclosed patio in the rear (that change occurred in 1937, it was replaced with the Art Building, so in the context of this proposed district, it is not a detriment to integrity). The windows have been replaced, and a canopy over the main entrance with stylized lettering has been removed. The report notes that wall vents have been added to the exterior and that the new accessible walkways and stairways to the entrance are a compromising alteration. Modifications to the English building include re-stuccoing, window replacements,

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<sup>16</sup> The National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, published by the National Park Service, provides standards for evaluating the physical condition, or *integrity* of historic properties that have the historic significance to meet national, state, or local designation criteria. *Integrity* is defined as *the ability of a property to convey its significance*. There are seven aspects of integrity, location, design, setting, materials, workmanship, feeling, and association. The Bulletin states that *[d]etermining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant*. Therefore, a determination of integrity may be different when evaluating an individual resource, or that same resource as part of a grouping, or when evaluating groupings or clusters in different combinations as historic districts.

changed building entrances and the addition of wall vents. Thus, the final conclusion of HRG for the EIR is that there are only two significant historic resources on the Samohi campus. They are Barnum Hall and the Greek Theater. Several of the artworks were also considered significant, including some that are in storage.

### **New Findings Based on a Prospect Hill Historic District within the Samohi Campus**

Both reports focused closely on the schools including the Samohi campus, and thus did not consider how important the PWA and WPA are to the history of the City of Santa Monica as a whole. Santa Monica was transformed by the PWA and WPA federal programs. Our entire beachfront was transformed from a narrow dirt road with a train track to the Roosevelt Highway that connected our city directly up the coast all the way to Oregon. The New Deal programs built the Arizona overpass from the top of Palisades Park, and the Olympic Tunnel that passes beneath Palisades Park, which is now part of the 10 freeway. The city also used the programs for a number of infrastructure projects like the Pier Bridge and the roadways beneath it, storm drains and street paving, the widening and enhancement of the California Incline, construction of City Hall, the Main Street Bridge, and several artworks including the library murals recently re-installed in our new main branch, and the Saint Monica statue at the foot of Wilshire Boulevard in Palisades Park. The list goes on and on. Nothing has impacted the way the city has developed to the extent that the WPA and PWA projects in the city did before or since.

Therefore, the concentration of these projects that remain intact on the Santa Monica High School campus are a very important cluster representing not only Santa Monica High School history but an important phase in the development of the entire city, and represent the deep impact of the New Deal programs nationwide. In that context, the concentrated cluster of historic resources on top of Prospect Hill is even more significant. This proposed historic cluster warrants further study for designation at the local, state, and national level.<sup>17</sup>

In conclusion, we urge you to reconsider the Samohi campus plans to replace the historic buildings, and consider an alternative which preserves and rehabilitates them, so our communities' history remains visible as we advance towards the future.

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<sup>17</sup> Local, state, and national designations each have their own unique sets of criteria for qualification. State and national designations are a form of recognition with broader significance, but do not have corresponding review mechanisms or protections. In the United States, based on the idea that a local community is best able to appropriately regulate their own historic resources, all protective ordinances are adopted on the municipal level.



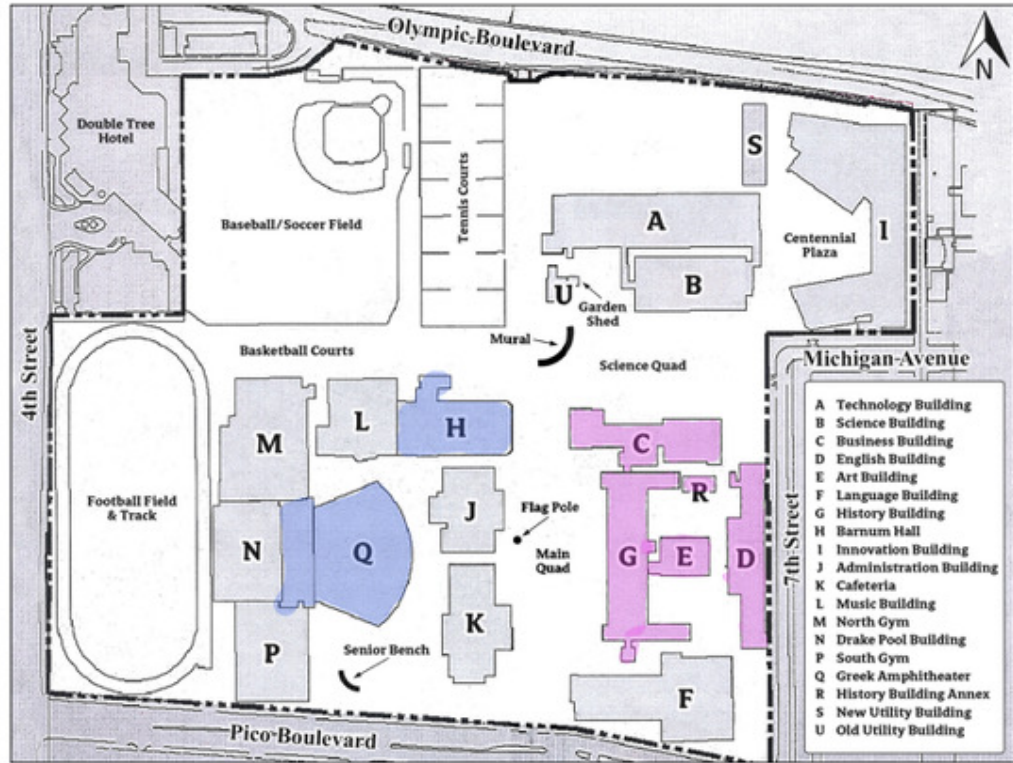


Figure 3. Existing Site Plan

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The buildings marked above in pink represent the potential Prospect Hill Academic Core Historic District at Samohi. Barnum Hall and the Greek Theater are marked in blue.