

DRAFT

**SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
LOS ANGELES TRADE-TECHNICAL COLLEGE
THIRTY-YEAR MASTER PLAN**

**GRAND THEATER DEMOLITION
2022 FACILITIES MASTER PLAN**

SCH No. 2004121007

**Prepared for
Los Angeles Community College District**

**Prepared by:
Sirius Environmental**

July 2022

**LOS-ANGELES TRADE-TECH COLLEGE
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Appendices

(Available on Trade-Tech College web site:

<https://www.lattc.edu/about/governance/committees#plans>, under “For the Public” and “Committee Plans”)

- A. NOP and Responses
- B. Magnolia Hall, Tom Bradley Center for Student Life Historic Resource Evaluation
- C. Structural Evaluation

1.0 INTRODUCTION AND SUMMARY

PURPOSE OF THE SUPPLEMENTAL EIR

In 2005, the Los Angeles College District (LACCD) approved a Facilities Master Plan (Master Plan) and certified the Los Angeles Trade-Technical College Thirty-Year Master Plan Final EIR (2005 FEIR). In 2009, the Master Plan was updated with some minor revisions and a corresponding 1st Addendum to the 2005 FEIR was adopted (2009 Addendum). In Spring 2019 incremental changes to the Master Plan (2019 Spring Master Plan) were made and analyzed in a 2nd Addendum to the 2005 FEIR. In the Spring 2019 Master Plan the fate of two buildings (Grand Theater and Redwood Hall) were undetermined. In August of 2019 the Notice of Preparation of this Supplemental EIR was published and included the potential for demolition of Redwood Hall. While the College has decided to continue to use the 35,728 square foot Redwood Hall (constructed in 1936), renovation and reuse of the Grand Theater building is infeasible and inconsistent with LACCD's programming and educational goals for the campus. Therefore, demolition of the Grand Theater and subsequent replacement with a re-designed campus entry is now proposed to be included in the 2022 Trade-Tech College Facilities Master Plan (2022 Master Plan).

The Grand Theater (formerly the Auditorium portion of the three-building Magnolia Hall Complex) was constructed in 1924. The building has been renovated and altered on a number of occasions over the years (including conversion from an auditorium to a performing arts theater). While it is currently vacant and substantially deteriorated, it is still considered potentially historic for purposes of CEQA. The Grand Theater is 29,976 square feet. The 2005 Los Angeles Trade-Technical College Facilities Master Plan Final EIR (State Clearinghouse No. 2004121007) did not include demolition of the Grand Theater (although it did include demolition of Redwood Hall). This Supplemental EIR is being prepared to address potential demolition of the Grand Theater.

The purpose of this Supplemental EIR is to evaluate the environmental effects associated with the 2022 Master Plan that includes demolition of the Grand Theater and replacement with a new campus entry. No other changes are proposed to the Master Plan. The horizon year for the 2022 Master Plan Update remains 2035. Forecast student enrollment remains at (or below) 21,300 as identified in the 2005 FEIR.

To comply with CEQA (Public Resources Code Sections 21000 et seq.) and *State CEQA Guidelines* (California Code of Regulations Sections 15000 et seq., hereinafter referred to as *Guidelines*), this Supplemental EIR (SEIR) to the certified 2005 FEIR has been prepared to evaluate the demolition of the Grand Theater and construction of a new campus entryway and plaza in its place, including shade trees, new gardens and hardscape, as proposed in the 2022 Master Plan.

Upon the LACCD Board of Trustees review and approval of the 2022 Master Plan and the certification of this 2022 SEIR, the 2022 Trade-Tech College Facilities Master Plan will then be the operative Trade-Tech College Facilities Master Plan.

REGULATORY BACKGROUND

According to Section 15164(a) of the *Guidelines*, "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a supplemental EIR have occurred."

Section 15162 of the *Guidelines* lists the conditions that would require the preparation of a supplemental EIR or negative declaration rather than an addendum. These include the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The proposed demolition of the Grand Theater (and associated refinements to the Master Plan), described in Section 2.0 of this Supplemental EIR, have been reviewed by LACCD in light of Section 15162 of the *Guidelines*. Since demolition of the Grand Theater, a historic resource, has not been previously evaluated in prior environmental documentation, LACCD determined that preparation of a Supplemental EIR is appropriate.

LEAD AGENCY

LACCD is the Lead Agency in accordance with Section 15367 of the CEQA Guidelines, which defines the lead agency as “the public agency that has the principal responsibility for carrying out or approving the project.” The project proponent as well as CEQA Lead Agency for the proposed project is:

Los Angeles Community College District
Dr. Reuben Smith, Chief Facilities Executive
770 Wilshire Boulevard
Los Angeles, CA 90017

INTENDED USES OF THE SEIR

This Supplemental EIR is prepared at the direction and under the supervision of LACCD. As discussed above, LACCD is the project proponent and also the Lead Agency under CEQA. The intended use of this Supplemental EIR is to assist LACCD in making decisions with regards to the proposed project (i.e., demolition of the Grand Theater and associated refinements to the Master Plan). This document may also be used by other public agencies as defined by CEQA Guidelines, Section 15381, if any will need to use the Supplemental EIR when considering permits or other approvals for the proposed project. Section 21096 for the CEQA Guidelines defines a “responsible agency” as a public agency, other than the Lead Agency, which has responsibility for carrying out or approving a project.

PUBLIC REVIEW AND COMMENTS

A Notice of Preparation (NOP) for this EIR was issued on August 21, 2019 (see Appendix A), by the Lead Agency. Information, data, and observations resulting from comments received during this period are included where relevant. This Draft Supplemental EIR will be circulated for a 45-day public review period. The public is invited to comment in writing on the information contained in this document. Persons and agencies commenting are encouraged to provide information that they believe is missing from the Draft Supplemental EIR, or to identify where the information can be obtained. All comment letters received will be responded to in writing, and the comment letters, together with the responses to those comments, will be included in the Final Supplemental EIR.

AREAS OF POTENTIAL CONTROVERSY

Commenters have expressed interest in the Grand Theater as a resource in the City of Los Angeles and Los Angeles Conservancy has inquired about the need for the project and the potential loss of a historic resource.

BACKGROUND AND INCORPORATION BY REFERENCE

The following documents have been prepared to analyze environmental impacts associated with development on the LATTC Campus and these documents are hereby incorporated by reference. These documents are available for review at LACCD downtown offices LACCD, 770 Wilshire Boulevard, Floor, Los Angeles, CA 90017 and at the LATTC Campus library (2nd Floor Mariposa Hall) as well as on-line at <http://www.build-laccd.org/reports>.

2003 LATTC Campus Plan FEIR

The Final EIR for the 2002 LATTC Campus Plan (2003 FEIR) was certified in September 2003. The 2002 LATTC Campus Plan included three elements to be accomplished within five years: 1) the expansion, renovation, modernization, and demolition of existing buildings; 2) the increase in open space, and 3) the implementation of non-structural upgrades. The 2002 LATTC Campus Plan also included the potential acquisition of property for additional building construction. Implementation of the 2002 LATTC Campus Plan increased the total building area on the campus from 780,000 to 850,600 gross square feet (including new central receiving areas) and increased the amount of open space from 355,316 square feet to 682,344 square feet. The 2003 Final EIR identified a future enrollment of 21,300 students in the year 2037 (35 years into the future at that time).

The following environmental issue areas were found to be significant and unavoidable: Air Quality (Construction – NO_x emissions); Air Quality (Operation – NO_x, ROG, and CO emissions); Historic Resources (impacts resulting from renovation of Magnolia Hall including the Grand Theater, impact of demolition of Redwood Hall); Noise (Construction); Transportation and Circulation (peak hour impacts at four intersections, including incremental addition to the Harbor and Santa Monica Freeways).

The 2002 LATTC Campus Plan was the foundation for the 2005 Thirty-Year Master Plan and associated 2005 Thirty-Year Master Plan FEIR.

2004 Addendum to the LATTC Campus Plan 2003 FEIR

The 2002 LATTC Campus Plan included plans to construct a six-story, 400-space Olive Street Parking Garage with an adjacent 150-space surface parking lot north of and directly adjacent to a proposed Child Development Center on the 3-acre Campus parcel located east of the Main Campus between Grand Avenue and Olive Street. The 2004 Addendum to the 2003 Final EIR analyzed constructing a five-story/six-level parking garage to accommodate 800 spaces instead of 400. This expansion involved extending the footprint of the previous garage design and eliminated the 150-space surface parking area that was proposed to the north of the parking garage.

2005 Thirty-Year Master Plan FEIR

The FEIR for the 2005 Thirty-Year Master Plan (2005 FEIR) evaluates construction, demolition, renovation and other facility improvements.

The Thirty-Year Master Plan integrated 3.46 acres east of Grand Avenue between 21st and 23rd Streets into the LATTC Campus. The acquisition of these properties allowed the LATTC Campus to be organized into four basic functional components: 1) Liberal Arts and Sciences on the north campus; 2) Physical Education and Recreation on the south campus; 3) Vocational Department and Programs along both sides of Grand Avenue; and 4) Campus Services distributed along Grand Avenue and the 21st Street alignment.

The 2005 Thirty-Year Master Plan included approximately 1.3 million square feet of proposed new instructional and office space for a total development of about 2,012,000 square feet. In addition to the Olive Street Parking Structure evaluated in the 2004 Addendum to the 2003 Final EIR, the 2005 Thirty-Year Master Plan included three proposed additional parking structures as well as parking under the athletic

fields (2,900 spaces) that added to the existing 1,451 spaces (including 441 leased and street parking spaces).

The future enrollment projection for the 2005 Thirty-Year Master Plan (out to the year 2035) was 21,300 students (this number was forecast for the year 2037, for purposes of presenting a conservative analysis the 2005 FEIR evaluated this student enrollment for the year 2035). The 2005 FEIR identified the following unavoidable significant adverse impacts: air quality (construction and operation), traffic (Grand Avenue/Washington intersection).

2009 Addendum to the 2005 Thirty-Year Master Plan FEIR

In 2009 LACCD sought to add a number of Opportunity Sites for potential acquisition to the Master Plan. Only Parcel 1a (now the 24th Street Parking Structure) remains as part of the proposed 2022 Master Plan. The other parcels identified in the 2009 Addendum were removed from the Master Plan via the Spring 2019 Master Plan Update. The 2009 Addendum to the 2005 FEIR evaluated the construction of a 1,000-space, 75-foot to 90-foot-tall, above-grade parking structure on Parcel 1a.

Spring 2019 Addendum to the 2005 Thirty-Year Master Plan FEIR

The Spring 2019 Master Plan refined proposed buildings and reduced proposed construction of new buildings and total proposed building area compared to the 2005 and 2009 Master Plans. The Spring 2019 Master Plan also revised building names.

SUMMARY OF EFFECTS

Section 3.0 Environmental Setting, Impacts and Mitigation Measures includes a summary of the historic resources report and analysis of impacts of the proposed demolition of the Grand Theater. Other impacts as well as mitigation measures would remain as analyzed in the 2005 FEIR as well as the Spring 2019 Master Plan Addendum.

The Grand Theater is located immediately adjacent to the rehabilitated East Classroom Building. In the event of an earthquake the Grand Theater building in its current condition represents a hazard to the East Classroom Building. Work on the East and West Classroom Buildings was completed in 2013. Demolition is proposed to remove that hazard. There are no plans to replace the Grand Theater building area as there is no educational programmatic need for a theater in LATTC's curriculum or Educational Master Plan. A new campus entry and open area is proposed in the 2022 Master Plan in this location.

The LACCD Trade-Tech Campus is an example of an educational campus that has evolved and continues to evolve to meet regional educational needs.

The 2005 FEIR identifies and analyzes alternatives to the Master Plan. Revisions to that analysis are not required. However, this EIR does provide one additional alternative that addresses rehabilitation of the Grand Theater.

The following **Table 1** summarizes impacts and mitigation measures identified in this SEIR. The SEIR identifies a potentially significant impact associated with the demolition of the two buildings.

**Table 1:
Summary of Impacts and Mitigation Measures**

Description of Impact	Mitigation Measures	Level of Significance After Mitigation
<p>The project has the potential to have an adverse change in the significance of a historical resource pursuant to CEQA Section 15064.5. Demolition of the Grand Theater would constitute a potential significant impact due to its eligibility to be a local historical resource.</p>	<p>HR-1 HABS Historic American Building Survey Level 2 Photographic Documentation. HABS level 2 documentation shall be undertaken for the buildings of the Magnolia Hall complex. Level 2 requires archival quality large format negatives and prints of exterior and interior views of the subject buildings. The negatives and archival prints shall be deposited into an archive collection of LATTC history. Also, an electronic copy of the photographs shall be made and deposited with the LATTC archive collection and another electronic copy deposited with the Los Angeles Public Library.</p> <p>HR-2. Establish and Maintain LATTC History Archive. LATTC shall develop a repository/archive collection within their library to contain materials regarding the history and use of the campus as the site of the Polytechnic High School and as LATTC. A historic preservation specialist shall be retained to help establish this archive.</p> <p>HR-3 Salvage. Some historic building materials that are not contaminated by hazardous materials (including lead and asbestos) will be salvaged and offered to the public for reuse.</p> <p>HR-4 East Classroom Wall. Finish the East Classroom wall in a manner compatible with the rest of the building consistent with the Secretary of Interior's Standards.</p>	<p>Significant. [The 2003 FEIR identified significant impacts as a result of 1) rehabilitation of Magnolia Hall including the Grand Theater and 2) demolition of Redwood Hall; the 2005 FEIR identified no additional impacts to historical resources.]</p>

SUMMARY OF ALTERNATIVES

This SEIR evaluates two alternatives to the project:

No Project. The building would remain in its current condition which would result in a less than significant impact. But continued deterioration of the building and the risk posed to the adjacent East Classroom in the event of earthquake or fire represent a significant adverse impact.

Rehabilitation Alternative. Under this alternative the building would be rehabilitated in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, which would result in a less than significant impact to the historic resource. However, the feasibility of meeting these standards while at the same time addressing seismic safety and other requirements to the satisfaction of the Department of the State Architect (DSA) is unknown.

2.0 PROJECT DESCRIPTION

PROJECT LOCATION AND ENVIRONMENTAL SETTING

The Los Angeles Trade-Technical College (LATTC) is located at 400 West Washington Boulevard just south of the downtown area of the City of Los Angeles (in the Southeast Los Angeles Community Planning area). The University of Southern California (USC) is located about 0.75 miles southwest of the LATTC Campus. The LATTC Campus is generally bounded by West Washington Boulevard to the north, Olive Street to the east, 23rd and 24th Streets to the south, and South Flower Street to the west.

The Grand Theater (also referred to as the Auditorium portion of the three-building Magnolia Hall Complex) is located along the Washington Boulevard frontage across the eastbound lane from the Grand/LATTC Metro light rail station.

Magnolia Hall is a Building Complex comprised of three buildings: The Grand Theater, the East Classroom Building (south of the east side of the Grand Theater) and West Classroom Building (west and south of the Grand Theater).

Figure 1 shows the location of the LATTC Campus and the location of Magnolia Hall on the LATTC Campus.

The LATTC Campus is about 700 feet south of the Santa Monica Freeway (I-10) and ranges from 400 feet to about 1,000 feet east of the Harbor Freeway (I-110).

The Grand/LATTC Metro Blue Line Station is located immediately north of the LATTC Campus with commercial uses located beyond.

Commercial uses are also located west across Flower Street to the west. The Expo light rail runs along Flower Street adjacent to and west of the LATTC Campus. The Expo Line LATTC/Ortho Institute Station is located on Flower Street just south of 23rd Street.

Multi-family housing, a community health center and Orthopaedic Medical Magnet High School are located south of the campus across 23rd Street. These uses are more than 1,150 feet from the Grand Theater. Orthopaedic Medical Magnet High School is also west of the LATTC 23rd Street Parking Structure across Grand Avenue.

South of the 23rd Street parking structure across 24th Street are commercial uses. An approximately 8-story Los Angeles Municipal Court building is located east of the LATTC Olive parking structure across Olive Street. Other commercial uses are located along Olive Street east of LATTC Campus.

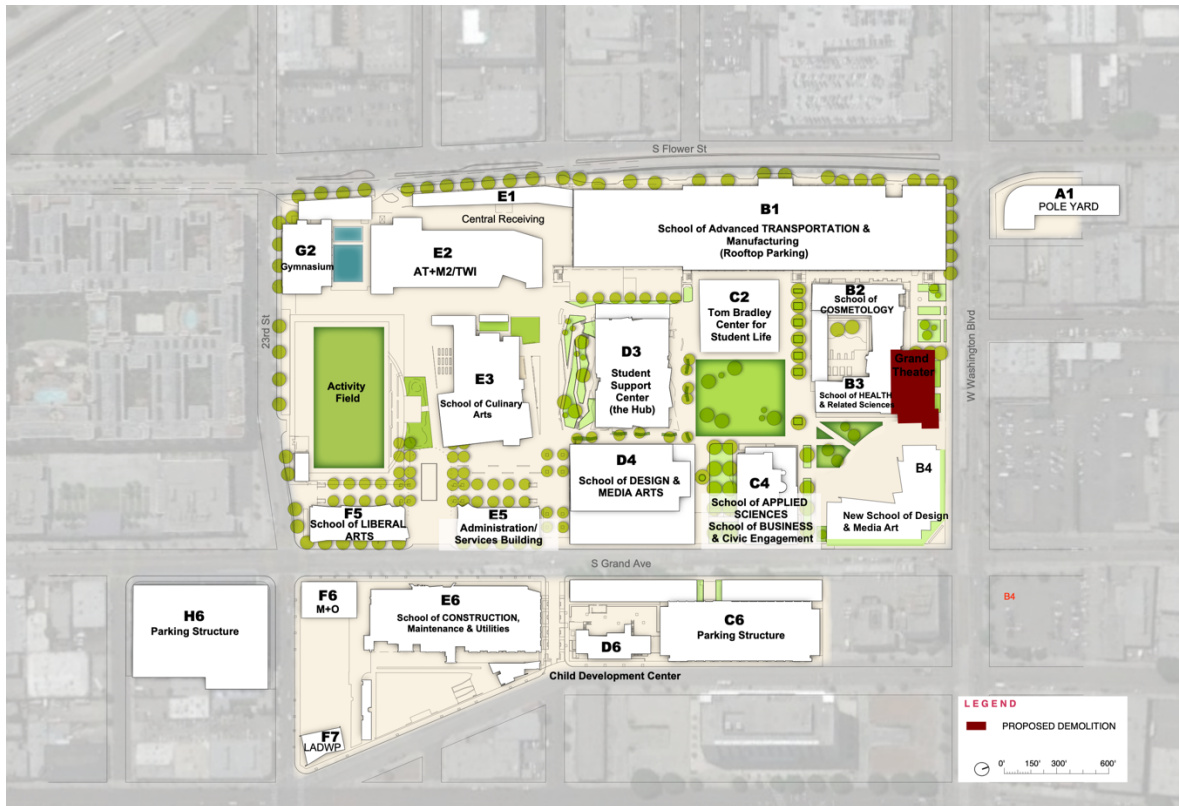
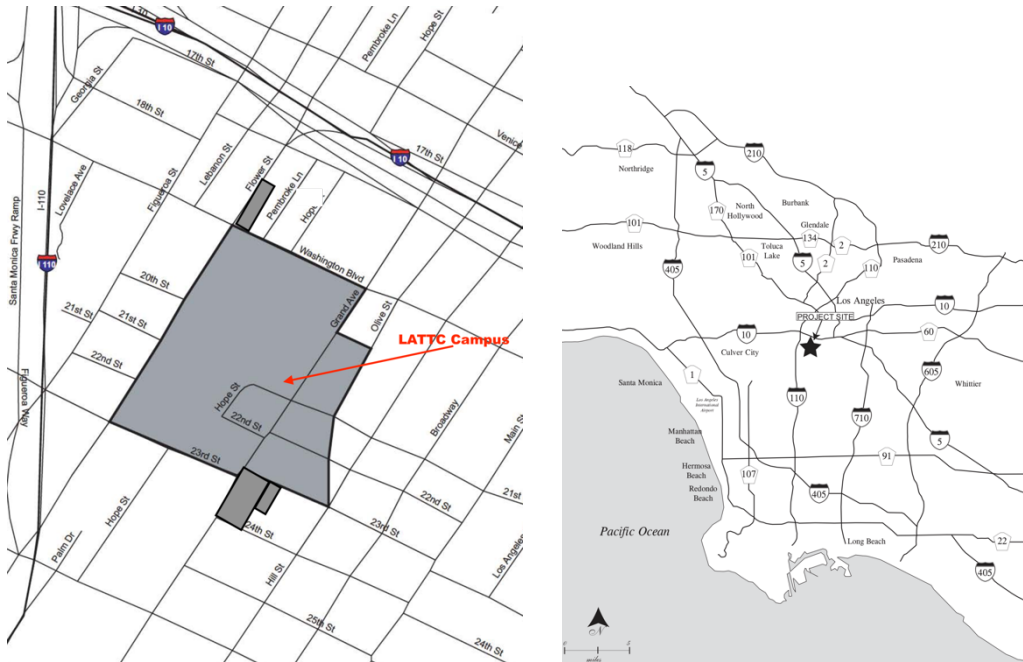


Figure 1: Project Location

PROJECT OBJECTIVES

Project objectives remain generally as stated in the 2005 FEIR – to build upon prior campus improvements, provide for improved circulation, access and campus organization, refurbish existing buildings (as appropriate to meet the objectives), and provide for additional parking and classroom space. The broad programmatic objectives were identified as follows:

- Accommodate student growth projections.
- Provide core curriculum and program opportunities to future students that are responsive to market demands and labor pressures.
- Improve vocational training opportunities while balancing the need to provide for greater instruction in the liberal arts and business disciplines.
- Establish a long-term economic development plan so as to regularly fund any necessary mechanical and technological upgrades.
- Provide for new learning environment opportunities that parallel those of liberal arts institutions in the form of lecture halls equipped with multi-media technology for addressing larger student audiences and for "distance learning."¹
- Maximize available outdoor open space.
- Incorporate sustainable building and operation practices through architectural design, which minimize the negative long-term effects on the environment, maximize energy efficiency and the use of renewable resources.
- Promote a college-like feel for the Campus.
- Provide an element of tranquility within the greater urban setting.
- Establish a distinctive link and unification of the Campus to the community through attractive landscaping and pedestrian-friendly circulation patterns.

The long-term vision includes to establish a broad, general departmental distribution pattern to guide in the preparation of campus-wide or individual building programs. To implement this vision, the 2005 FEIR identified the following objectives:

- Maximize the efficiency and utilization of land area through a complete reorganization of campus elements.
- Provide an increase of over 1.3 million square feet of development on the Campus beyond what is provided in the Five-Year Campus Plan.
- Define and establish a dignified and visible entry to the Campus.
- Improve the overall organizational, distribution and placement of buildings supporting key academic and vocational programs.
- Re-organize the campus-wide parking plan to provide increased parking in strategically located parking structures around the periphery of the Campus.
- Incorporate detention systems and permeable paving to achieve maximum on-site retention of surface water/storm water runoff.
- Strategically locate trees and landscaping so as to maximize passive energy efficiency and reduce the heat island effect.
- Use reclaimed water for supplying water features and install efficient landscape irrigation systems.

¹ Trade-Tech has changed focus towards smaller-scale more intimate teaching facilities and laboratory space consistent with its technical orientation and has no need for large auditorium-style teaching facilities.

-
- Use recycled materials in new construction whenever feasible (i.e., asphalt and concrete from the deconstruction of parking lots, commercially available furniture made of recycled plastics).

These objectives generally remain; except that the LATTC parking strategy is being refined to reflect state, regional and local goals to reduce vehicle miles travelled and greenhouse gas emissions.

Since the certification of the 2005 FEIR, LACCD has identified additional objectives:

- Maximize sustainability of the LATTC Campus (e.g., through reductions in parking and use of sustainable materials and operational practices).
- Balance historic preservation with building efficiency and space requirements, such that buildings with the highest integrity and utility are preserved (e.g., Magnolia Hall East and West Classroom Buildings).
- Spend money efficiently and maximize educational benefits for under-served communities.

Demolition of the Grand Theater would address objectives related to maximizing efficiency of land area and providing for core curriculum and program opportunities (by removing inefficient space that does not serve core programs) as well as maximizing available outdoor open space and promoting a college-like feel and an element of tranquility. The project would result in efficient use of funds and retention of funds to further the Trade-Tech educational program.

PROPOSED PROJECT CHARACTERISTICS

The proposed project is the demolition of the Grand Theater on the LATTC Campus. **Figure 2** shows photographs of the Grand Theater exterior and interior.

Figure 3 shows an aerial view (looking south) of the Magnolia Hall Complex (Grand Theater, East Classroom Building and West Classroom Building), **Figure 4** shows an aerial view of the Magnolia Hall Complex looking north including a view of the new south entrance addition and the mature fig tree.

Figures 5 through **7** show photographs of the Grand Theater (exterior and interior).

The Grand Theater (also known as the Auditorium portion of the three-building Magnolia Hall Complex) has been renovated a number of times over the years and has been vacant since 2009 when it was partially demolished for the seismic retrofit of Magnolia Hall (East Classroom).

Changes to the Grand Theater over time have impacted the historic fabric of the building features such as eliminating exterior details including an exterior staircase, decorative light fixtures, decorative tile cornices, decorative transoms and door lintel; interior modifications included attachment of acoustical tile to walls and removal of original features including paneled wood doors and lighting fixtures in the lobby. The building interior today is a mix of some residual features from the original design of the Grand Theater and the features and finishes added to the interior in the 1978 remodel from a high school auditorium to a Grand Theater. In addition, the building has deteriorated substantially over time and it is now in poor condition – both building systems and building fabric. The Grand Theater is proposed for demolition because of its deteriorated condition (including potential safety risk to the adjacent East Classroom Building), incompatibility with campus programming and education goals, and infeasibility of repair.

As part of the demolition of the Grand Theater, the existing wall between the Grand Theater and East Classroom building would need to be replaced and a buttress would be needed to support the existing East Classroom Building foundation wall (see **Figure 8**). Soil disturbance would occur in previously disturbed areas. The current location of the Grand Theater would become landscaped open space with a new campus entry adjacent to the Grand/LATTC Metro Blue Line Station (see **Figure 9**).

The Grand Theater is located immediately adjacent to the rehabilitated East Classroom Building. In the event of an earthquake the Grand Theater building in its current condition represents a hazard to the East Classroom Building. Demolition is proposed to remove that hazard. There are no plans to replace the Grand Theater building area as there is no educational purpose for this type of space at Trade-Tech.

Figure 10 shows the Spring 2019 Facilities Master Plan, **Figure 11** shows the 2022 Facilities Master Plan with the Grand Theater removed and new campus entry.

SCHEDULE

Demolition of the Grand Theater would occur on completion of environmental review and action by the Los Angeles Community College District Board – anticipated to be late 2022.

DISCRETIONARY APPROVALS

Los Angeles Community College District Board: Approval of demolition of the Grand Theater and associated 2022 Master Plan update.



Figure 2: Aerial View Looking South Showing Magnolia Hall Complex (Grand Theater, East Classroom Wing and West Classroom Building)



Figure 3: Aerial View Looking South Showing Magnolia Hall Complex (Grand Theater, East Classroom Wing and West Classroom Building) including New South Entrance and Mature Fig Tree



Figure 4: Grand Theater East and North Elevations

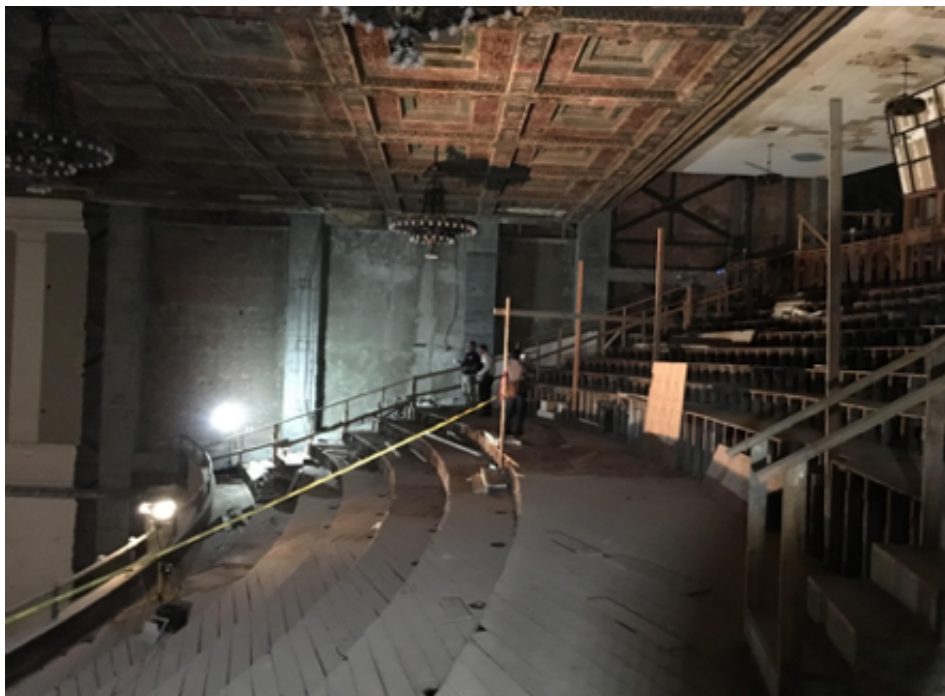


Figure 5: Grand Theater Interior – Balcony and Ceiling



Figure 6: Grand Theater Interior – View from Balcony



Figure 7: Grand Theater Interior – View of Balcony

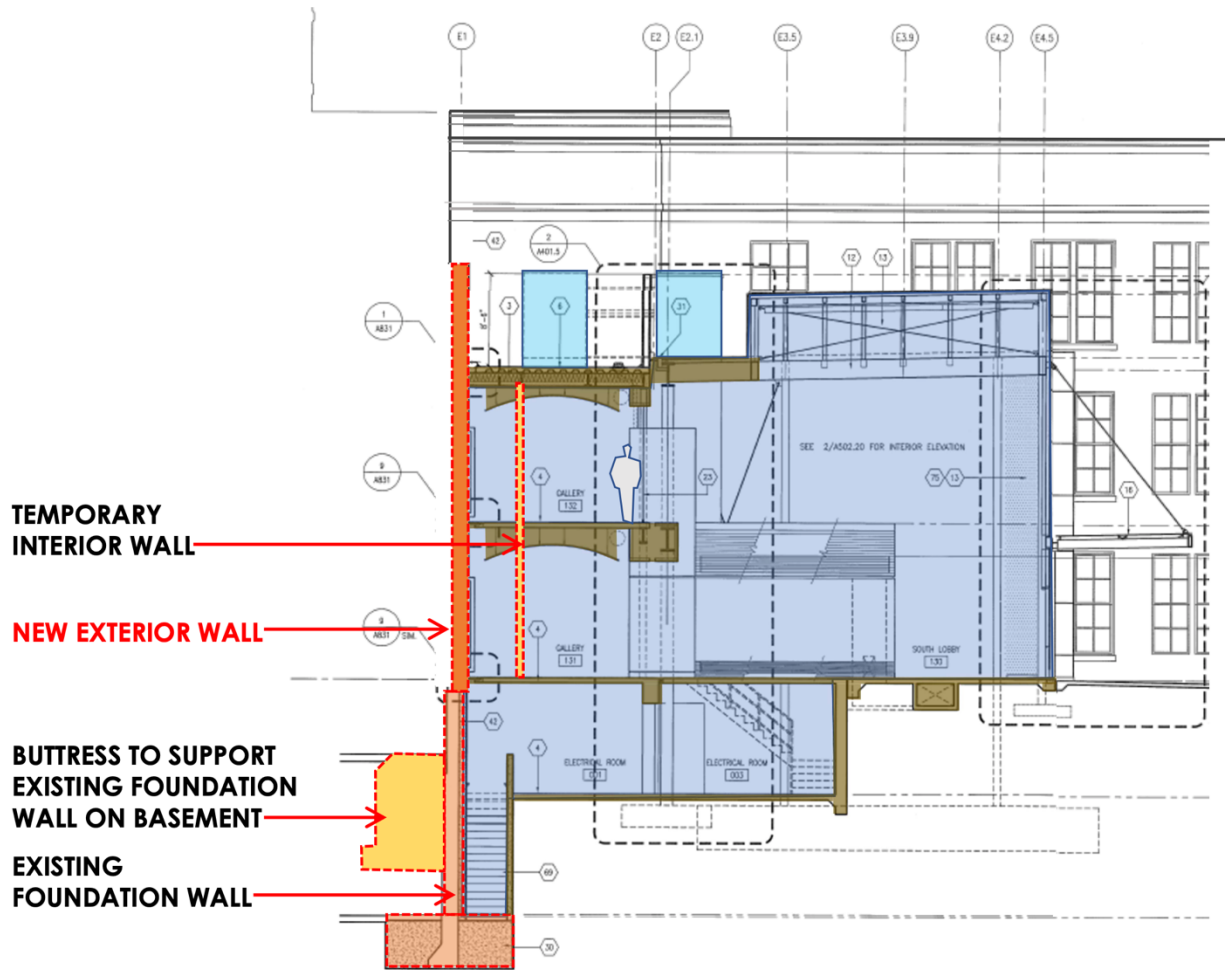


Figure 8: East Classroom Building Replacement Wall and Foundation Buttress Support



Figure 9: Proposed New Entry on Washington Boulevard

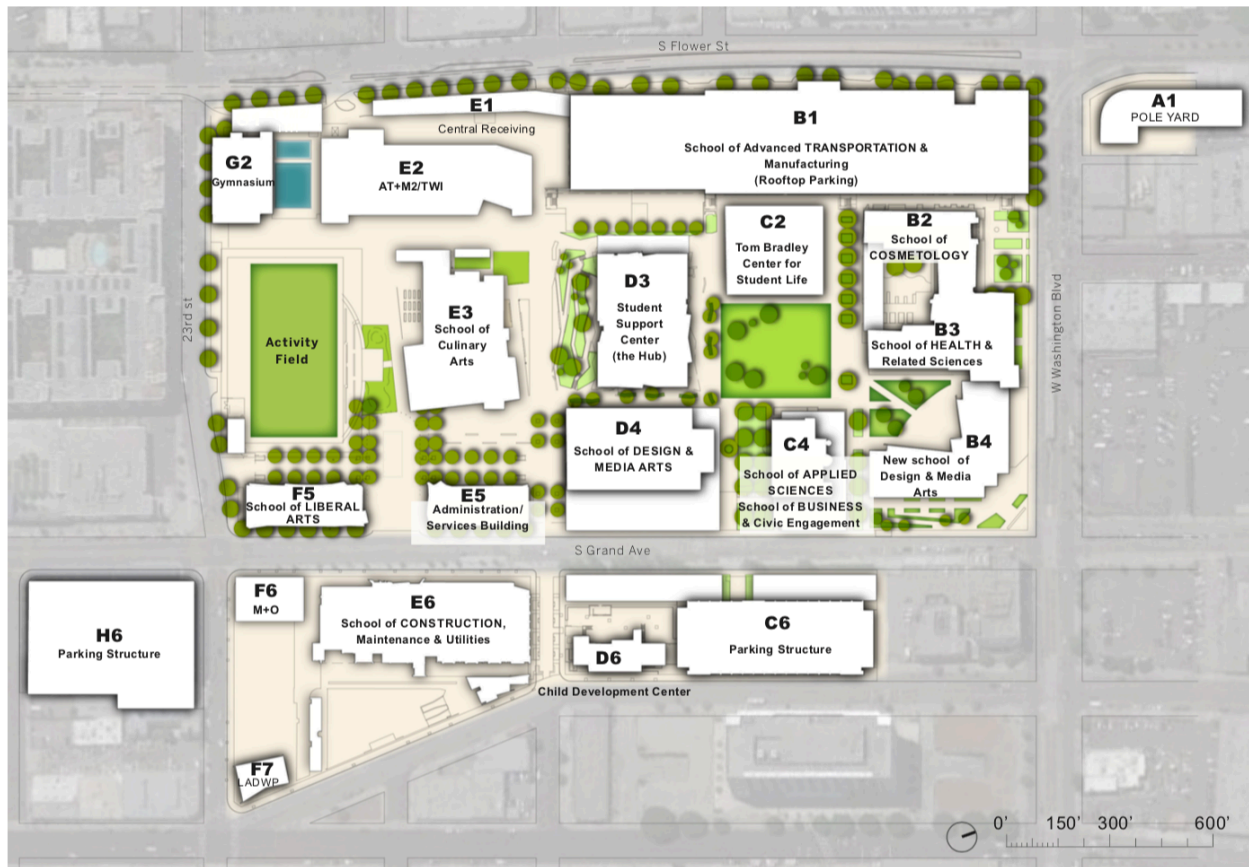


Figure 10: Spring 2019 LATTC Facilities Master Plan

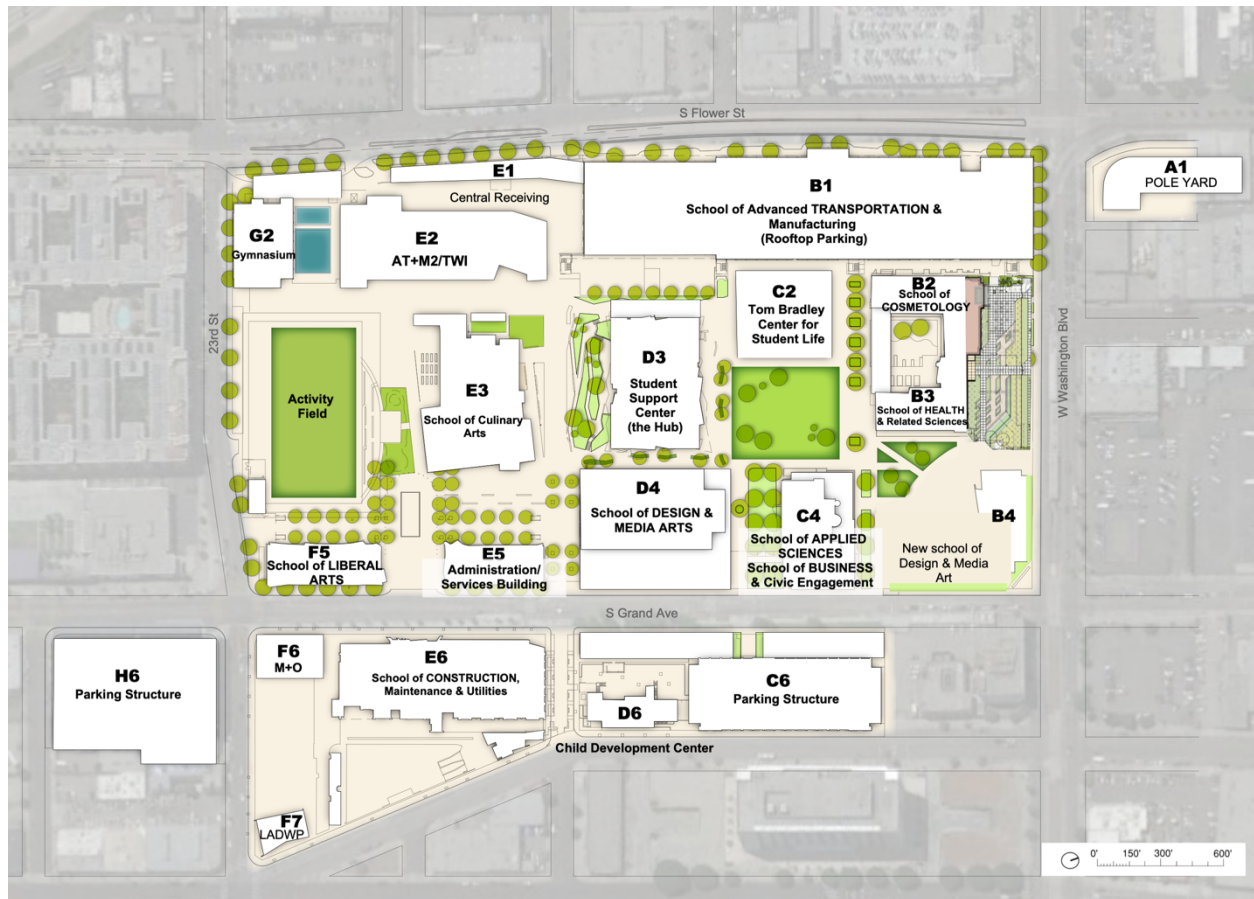


Figure 11: 2022 LATTC Facilities Master Plan

3.0 ENVIRONMENTAL SETTING IMPACTS AND MITIGATION MEASURES

The analysis below addresses historical resource impacts. Since demolition of the Grand Theater, a historic resource, has not been previously evaluated in prior environmental documentation, LACCD determined that preparation of a Supplemental EIR is required.

Historic impacts of overall development of the LATTC Campus were evaluated in the 2003 Campus Plan FEIR. That EIR indicated the rehabilitation of Magnolia Hall in accordance with the Secretary of the Interior's Standards would result in a significant impact to historic resources. In addition, it indicated that the then-proposed demolition of Redwood Hall (then identified as Building C, Learning Skills Center) would also be a significant adverse impact even with mitigation.

The 2005 FEIR evaluated impacts of a comprehensive Facilities Master Plan. Impacts to issue areas, other than historic resources as well as mitigation measures would remain as analyzed in the 2005 FEIR and subsequent updates, including the Spring 2019 Master Plan Addendum.

HISTORICAL RESOURCES

The following discussion summarizes the Magnolia Hall, Tom Bradley Center for Student Life, Historic Resource Evaluation, prepared by Kaplan Chen Kaplan in August 2019 (which included review of the 2003 Campus Plan FEIR evaluation of historical resources). The full Historic Resource Evaluation is contained in **Appendix B**.

REGULATORY BACKGROUND

National Register of Historic Places

The National Historic Preservation Act (NHPA) of 1966 established the National Register of Historic Places (National Register) as an authoritative guide “used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and indicate what properties should be afforded protection from destruction or impairment.”¹

Buildings, districts, sites and structures may be eligible for listing in the National Register if they possess significance at the national, state or local level in American history, culture, architecture or archeology, and in general, are over 50 years old. Significance is evaluated using established criteria:

¹ 36 Code of Federal Regulations, Section 60.

- A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Are associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Significance of Association. *National Register Bulletin 32, Guidelines for Evaluating and Documenting Properties Associated with Significant Persons*, provides guidance on evaluating potential historic association with people who have “made contributions or played a role that can be justified as significant.” For association with leaders or prominent families it is necessary “to explain their significant accomplishments” and they “must be compared to those of others who were active, successful, prosperous, or influential in the same field.” Most properties nominated for associations with significant persons also are nominated for other reasons and a majority of properties nominated under the association criterion are also significant in the area of architecture or for the area in which the individual(s) achieved recognition.

National Register Bulletin 32 adds that the fact that we value certain professions, or the contributions of certain groups historically does not mean that every property associated with or used by a member of that group is significant. Associations with one or more individuals in a particular profession, economic or social class, or ethnic group will not automatically qualify a property. The contribution must be distinctive: it is not enough to show that an individual has acquired wealth, run a successful business, or held public office, unless any of these accomplishments, or their number or combination, is a significant achievement in the community in comparison with the activities and accomplishments of others.

Integrity. Properties may be eligible for inclusion on the National Register as individual resources and/or as contributors to an historic district. *National Register Bulletin 15: How to Apply National Register Criteria for Evaluation* states that in addition to meeting at least one of the four criteria, a resource should be evaluated to assess its integrity. For individual resources to qualify for inclusion they must represent an important aspect of an area’s history and possess integrity. An historic district must retain integrity as a whole, “the majority of the components that make up the district’s historic character must possess integrity even if they are individually undistinguished.”

The seven aspects of integrity are location, design, feeling, association, setting, workmanship and materials. To “retain historic integrity a property will always possess several, and usually most, of the aspects.” For a resource to be evaluated as significant for its design, a “property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”

Historic Context. A resource must also be significant within an historic context. *National Register Bulletin 15* states that an historic context explains “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.” To be determined eligible for listing on the National Register a property must possess significance within a historic context and possess integrity.

Historic District. According to *National Register Bulletin 15*, an historic district derives its importance from being a unified entity whose identity as a district “results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment.” An historic district is “a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations...the boundaries must be based upon a shared relationship among the properties constituting the district.”²

California Register of Historical Resources

The California Register, based on the National Register, is the “authoritative guide to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and indicate which properties are to be protected.” A building, site, structure, object, or historic district may be eligible for inclusion on the California Register if it meets one or more of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States
2. It is associated with the lives of persons important to local, California, or national history
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

California Office of Historic Preservation Technical Assistance Series #6, California Register and National Register: A Comparison states that in addition to meeting one of the criteria of significance, a resource must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance” and “integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.” Historical resources that “have been rehabilitated or restored may be evaluated for listing.”

Series 6 Guidance also states, “Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.” Historical resources that do not retain sufficient integrity to qualify for the National Register may still be eligible for listing in the California Register: “a resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.”³

2 National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation, pp. 5-6, <https://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>

3 California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison, p. 3.

City of Los Angeles Historic-Cultural Monument

A City of Los Angeles Historic-Cultural Monument is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles. A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, or local history.
2. Is associated with the lives of historic personages important to national, state, city, or local history.
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose individual genius influenced his or her age.

City of Los Angeles Historic Preservation Overlay Zone (HPOZ)

An Historic District in the City of Los Angeles is known as an Historic Preservation Overlay Zone (HPOZ), a significant concentration, linkage, or continuity of sites, buildings, structures, objects, landscape or natural feature united historically or aesthetically by plan or physical development. The criteria for the designation of an HPOZ are:

1. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance and possesses historic integrity reflecting its character at that time.
2. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community or city.
3. Retaining the building, structure, landscaping, or natural feature, would contribute to the preservation and protection of a historic place or area of historic interest in the City.

An HPOZ boundary and its contributing resources are identified through a Historic Resources Survey conducted for the HPOZ.

ENVIRONMENTAL SETTING

History of Los Angeles Polytechnic High School

In 1913, a U.S. Presidential commission on vocational education inspired the 1917 Smith-Hughes Act that mandated compulsory educational requirements for youth and provided federal funding for vocational schools. In Los Angeles the Polytechnic High School provided commercial courses, while the Manual Arts High Schools offered industrial and household arts coursework. A Part-Time High School was also established in 1920 (becoming Metropolitan High School in 1926). In 1925, the Frank Wiggins Trade School was established on Grand Avenue in downtown Los Angeles, on what is now the LATTC Campus. The school was relocated to a 10-story building on South Olive Street at Venice Boulevard in 1927 where it remained until 1957.

Plans for the new site of the Polytechnic High School were adopted by the City Council of Los Angeles in 1904 after the voters of Los Angeles had approved bonds for school construction in 1902. The campus was

to consist of four buildings, including an auditorium, and its architecture was to be “Grecian-Ionic” and the buildings were to have a “cement finish for the outside walls and gravel roofs.”

The architect for the Polytechnic High School was the Los Angeles firm of Burnham & Bliesser. The two main Beaux-Arts classical style buildings were box-like in plan and featured monumental elevations facing Washington Boulevard.

By the 1922 Sanborn Map, Polytechnic High School had grown into a campus taking up over half of the city block bounded by West Washington Boulevard on the north, Flower Street on the west, Barnard Park on the east. The school acquired a few parcels across 20th Street on the south. An Arts Building had been constructed in 1910 on the northeast corner of Flower Street and 20th Street.

After voters approved bonds for school improvements in 1922, an “extensive development program of considerable magnitude” was undertaken by the Los Angeles City Board of Education including “construction of fifty new elementary schools, three junior high schools” as well as “the purchase of new sites and the erection of numerous school buildings and additions in various sections of the City.”⁴

One of the projects was \$340,000 for “erection of a three-story building to be built adjoining the present Polytechnic High School, to be used as an auditorium and class rooms.” The new auditorium was to be built on the site of the school’s original auditorium (one of the two original buildings at the Washington Boulevard site).

Articles from the Los Angeles Times described plans for the new building: “Preliminary sketches [were] being prepared by Morgan, Walls and Morgan, architects to provide designs for the new addition to follow the architecture used in the main building. It will contain an auditorium to seat 2000 persons and numerous rooms to provide space for the increased number of students in attendance and the addition of several new departments. Italian renaissance will be featured in the exterior designs, with massive pillars typical of that country, on both elevations.”⁵

Another article from the period described the design of the building to be finished in the Spanish Renaissance style of architecture. It noted that in addition to the Auditorium Building, a “classroom portion of the building will adjoin the auditorium in the form of a wing and will be 200 feet long and seventy-two feet wide.”⁶ In a 1923 article, a sketch of the building was provided and architect Stiles O. Clements from the firm Morgan, Walls and Morgan, discussed the progress of construction. Although the article noted that “plaster will predominate in the facing of exterior walls which will be in keeping with the design of the main unit,” the classroom wing was designed with more classical features while the auditorium building had Moorish architectural features.⁷

The first Auditorium/Gym Building was demolished to make way for a new auditorium that was finished in 1924. The East Classroom Building was finished in 1925. Like the then existing 1905 Main Building, the new high school auditorium building (now the Grand Theater) was built to the Washington Boulevard

4 Millions for City’s Schools: Millions Will Be Spent in Coming Months for Attractive Additions to School System,” *Los Angeles Times*, April 29, 1923.

5 Ibid.

6 “New School Auditorium,” *Los Angeles Times*, December 27, 1922.

7 “New Schools Designed: Modern Structures to be Erected in Los Angeles,” *Los Angeles Times*, September 2, 1923.

sidewalk without any setback. The classroom wing was added onto the south of the Grand Theater. The face of the campus remained on Washington Boulevard. The east elevation of the East Classroom, attached to the Grand Theater, faced Barnard Park and had some limited architectural detailing including horizontal scoring below the parapet. To the west of the 1925 East Classroom was the rear wing of the Main school building with the Boiler Room in between. As a result, the west elevation of the East Classroom had fewer architectural features than the east elevation. The area to the south of the building appears to have been treated as the back of the house area as the south elevation of the East Classroom wing did not include any architectural detailing.

Buildings on the Polytechnic High School campus were damaged in the 1933 Long Beach earthquake. In 1935, a permit for a new building was taken out. The replacement building, today the West Classroom wing of Magnolia Hall, was sited to the west of the 1925 Auditorium Building (Grand Theater). It was designed in the Renaissance Revival architectural style by the firm of Albert C. Martin. This “L” shaped building was setback further from Washington Boulevard than the original building and the Grand Theater. Its primary façade faces Washington Boulevard where there is a small setback area from the street. As the east and south elevations of this building faced the Boiler Room Building and the west elevation of the Grand Theater’s classroom wing, those elevations were given a sparer design with fewer architectural details than the front (north) and west elevations of the building.

In 1935, the school was renamed the John H. Francis Polytechnic High School after its first principal who later became Superintendent of the Los Angeles schools. A year later, in 1936, the Industrial Arts Building, also known as Redwood Hall and as the Tom Bradley Center for Student Life (TBCSL), was constructed replacing the former Science Hall along 20th Street. The building was designed by A.C. Martin. In 1956, an addition to the TBCSL/Redwood Hall was constructed along its south elevation.

History of Los Angeles Trade-Technical College

The Frank Wiggins Trade School was established on Grand Avenue in downtown Los Angeles in 1925. It was named for the longtime secretary of the Los Angeles Chamber of Commerce. The school was to provide “a course of adult education in specific vocations and placement of students in the occupations for which they had been trained. Among the curricula, the school offered the first professional culinary training program in the nation, an offshoot of the home economics program.” The school was relocated to a 10-story building on South Olive Street at Venice Boulevard in 1927 where it remained until 1957.⁸

In 1953 the trade school had over 6,000 students and the school had to lease buildings at various locations in addition to its main headquarters to accommodate the enrollment. The plan to build a new campus for Polytechnic High came with the proposal to move the Frank Wiggins Trade School to the high school’s Washington Boulevard site.

After the Polytechnic High School moved from its Washington Boulevard campus in 1957, the Frank Wiggins Trade School was able to centralize its operations and “increase its effectiveness, efficiency and service” at that location.⁹ Over the sixty years since then, the campus has grown, moving southward to 23rd Street and eastward across Grand Avenue.

⁸ *LAUSD Historic Context*, p. 46-47.

⁹ “San Fernando Valley to Get New Poly High,” *Los Angeles Times*, December 11, 1953.

Around 1957, the firm of Kester, Wright & Kester Architects and Engineers were commissioned to prepare a master plan for the school. The first phase of renovation of the Polytechnic High School campus to accommodate the trade and technical college included an investment of almost one million dollars. The plan included remodeling of “two existing facilities formerly occupied” by the high school and included “changing the old science building into space for electric and aircraft trades, the industrial arts building into use for printing trades, second floor of the administration building for cosmetology, second floor of the domestic science building for apparel trades and power sewing, and other existing structures for general classrooms, offices and student-activity area.”¹⁰

The campus was to be “protected by noise cushioned strips which will provide parking facilities off Flower and Grand Avenues.”¹¹ The master plan included addition of several more buildings. In the 1960s, four buildings were constructed along the west perimeter of the campus, along Flower Street between Washington Boulevard and 23rd Street. A trades building, Sequoia Hall, constructed in 1961, was to “house the bricklaying, plastering, upholstery, painting, papering, refrigeration, sheet metal, mill cabinetry and carpentry classes as well as respective department offices.”¹² Oak Hall was built in 1966 as the Automotive Technology Building. Willow Hall was constructed in 1966 as the Physical Education Building and Laurel Gymnasium was built in 1968.

In recent years the main campus has evolved to orient buildings around open spaces reclaimed by demolition of former buildings in the interior of the campus and removal of surface parking lots. The creation of the North Quad was made possible by demolition of the former Science Building.

Between 1975 and 2010, no new buildings were constructed on the LATTC campus. In 2003, a Master Plan for the LATTC campus was developed. The first buildings of the 21st Century master plan were realized around 2010 with construction of two new buildings, Juniper Hall and Aspen Hall, located along Grand Avenue at the south end of the campus.

In recent years land across Grand Avenue to east, between Washington Boulevard and 24st Street, was developed with the multi-story Olive Street Parking Structure, the multi-story 24th Street Parking Structure and a new Child Development Center.

Description of Magnolia Hall Complex (including the Grand Theater)

Magnolia Hall is a structure consisting of three building structures from the Polytechnic High School period: the 1924 Auditorium (Grand Theater), the 1925 east classroom wing (East Classroom Building), and the 1935 west classroom wing.

The 1924 Auditorium and the 1935 west classroom wing were designed, as were the original 1905 buildings, with their front elevations facing Washington Boulevard. The 1924 Auditorium building, like the then existing 1905 main building, was built to the sidewalk with no setback. The 1935 west classroom wing was setback from the sidewalk with a front lawn area.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

The long elevations of both classroom wings extended to the south and were designed as narrow legs in order to have windows that provide natural light into the classrooms on the double loaded corridors. The south end of the 1925 east classroom wing has an unadorned elevation. The original south elevation of the 1935 west classroom wing is obscured by a contemporary addition at its south end but originally had an entrance door into the building at its south end.

The 1925 and 1935 classroom wings were separate buildings constructed for the Polytechnic High School. They were connected via a lobby addition as part of the East Classroom renovation in 2011. This lobby addition faces south and in addition to connecting the building interiors, this addition reorients these buildings to the south where the majority of the other LATTC Campus buildings are located.

Also constructed since 2003 is an addition onto the south end of the west classroom wing of Magnolia Hall where an entrance from the south into the building was originally located. These additions were designed to orient the buildings to the rest of the campus buildings the majority of which are located to the south. A new landscaped courtyard was created between the classroom wings. This area had been occupied by early buildings of the Polytechnic High School and was the site of the Boiler Room. The courtyard retained the specimen Fig Tree and added paving and landscaping between the wings.

Description of Grand Theater Building

The “large three-story auditorium [now the Grand Theater] was constructed in 1924 along Washington Boulevard as a replacement for the 1905 gymnasium/auditorium on the same site...the auditorium’s main entrance is on the west side of the building. When built, the old 1905 Main Administration Building was still extant and attached to the new auditorium to the west. The auditorium is a reinforced concrete building capped with a flat roof and sprayed with a non-original gunnite finish. Its design is an unusual mix of Moorish and Classical Revival styles.”¹³ A Los Angeles Times newspaper article featured comments from architect Stiles O. Clements and included an illustration of the auditorium/classroom building showing it as a mix of an asymmetric Moorish/Spanish Colonial Revival for the auditorium and a symmetrical Classical Revival style design for the classroom building.¹⁴

The Grand Theater is generally rectangular in plan. Attached to the east elevation and set back slightly from the street is a taller rectangular building element. Also clad in stucco, that elevation facing Washington Boulevard is devoid of architectural details. In front of this structure is a one-story rectangular element which is attached to the taller module onto its south and is attached to the main section of the Auditorium Building on the west.

In 1934-35 after the Long Beach Earthquake, the buildings underwent seismic retrofit and repair conducted by Albert C. Martin Architects.

The Grand Theater exterior has been modified by the removal of the original exterior staircase near the northeast corner of the building, infill of several perforated concrete screens, replacement of the main entrance doors, and a coating of gunite. The main entrance along the primary west elevation is shaded by a wide flat steel awning, supported by chains, with strips of opaque glass for filtered light. An ornamental iron crest of acanthus leaves crowns the awning. A cant bay box office of wood construction is flanked by

¹³ *Los Angeles Times*, April 29, 1923.

¹⁴ *Los Angeles Times*, September 2, 1923.

a pair of non-original double steel doors on either side beneath the awning. Above the awning on the second floor is a band of five perforated concrete screens. On the third floor, centered above the screens, is a recessed combination squared and rounded window with molded surrounds.”

Along the Washington Boulevard (north) facade is a row of six, squared pilasters. Steel framed, deeply recessed multi-pane casement windows fill the spaces between the pilasters. A decorative, wrought iron sconce and perforated concrete screen (since filled-in) are east of this window grouping.

A decorative stair along the street (north) elevation was removed. It had been previously partially removed and reconfigured with a modern stair but now all has been removed leaving marks where the original stair was demolished. The matching decorative light fixture at the stair is no longer in place. The original decorative tile cornice band, a major decorative feature, was removed at some point. Overall, the top layer of finish on the exterior plaster is delaminated in areas. Also removed are the east side door’s original decorative lintel.

At the main entry, decorative transoms have been removed from over two pairs of entry doors and old signage removed. The ticket booth remains generally intact in form, but decorative details appear to have been removed. Four wood doors remain in place. A projecting metal framed entry skylight is rusted including structural spanning elements and the surrounding frame.

In 1975, the Los Angeles Community College District approved a \$95 million building plan that included funding for the renovation of the Grand Theater at Trade Tech.¹⁵ When the Grand Theater building was closed down in 1978, it was described as “scarred by more than 50 years of use and abuse, damaged by fire and equipped with antiquated sound and stage systems as well as creaky wooden seats.” The auditorium theater had been used for graduation and for “other annual programs like the gold Thimble Fashion Show, the student talent show, and student assemblies.”

The building was originally constructed as a high school auditorium in 1924. The c1978 major renovation embellished the auditorium interior with elements more decorative than what would be found in a 1920s public school auditorium. The remodeled space was renamed the “Grand Theater” as “the primary mission of the design effort was to convert the school auditorium into a full-fledged performing arts facility.”¹⁶

Key features of the project included adding “a superior sound and lighting system as well as improved acoustics” to the 1,560-seat auditorium (with 500 of the seats in the balcony). It also included “new upholstered seating, new draperies, carpeting, dressing facilities, a prop room, new control rooms, air conditioning and an orchestra pit.”¹⁷

The renovated interior of the new theater “consists of a lobby, balcony, stage, and main seating area. Crown molding, squared pilasters with Corinthian capitals, turned posts, and original suspended light fixtures characterize the lobby area. The walls and ceilings of the theater and proscenium are festooned with intricately patterned floral and classical motifs in molded relief. Ornate medallions and perforated wood

15 “College Board Approves \$95 Million Building Plan,” *Los Angeles Times*, November 13, 1975.

16 <https://www.behrbrowsers.com/lattc-grand-theater-et>

17 “Renovation of Aged Auditorium,” *Los Angeles Sentinel*, “January 24, 1980.

ceiling screens characterize the proscenium. Suspended from the intricately decorated theater ceiling are original chandeliers. Interior modifications include the attachment of acoustical tile on wall surfaces.”¹⁸

The lobby retains its original semicircular shape with an arched ceiling that is generally intact although finishes are highly deteriorated and peeling. Many of the original paneled wood doors into the theater space have been replaced with solid metal doors. Windows appear to be original. Lighting fixtures in the lobby are not original. A mix of several renovations has resulted with rows of flush square ceiling lights on the curved surface and a track light system at the top of the arched ceiling running the length of the space. Decorative interior side of entry transoms are in place.

The high ceiling above the main seating area is the original stenciled ceiling and is in relatively fair to good shape without major damage. However, the ceiling under the balcony does not have any original stenciling and part of the area of the ceiling above the balcony does not have any of the original painted ceiling. The lighting fixtures are original.

The chandelier type light fixtures hanging from the high ceiling are original and appear to be in fair condition. A few smaller decorative light fixtures remain. The proscenium area, while in relatively good condition, does not retain much original detailing. The two panels flanking each side of the stage with the organ pipes have been remodeled several times as seen in photographs.

The seating was completely replaced both on the main floor and in the balcony; those seats are now damaged and deteriorated. The original floor of the main level and balcony have been replaced. The control booth has been modified multiple times and is now completely stripped surrounded by a painted white flat ceiling.

There is a painted screen curtain, with a desert landscape motif. This curtain is water stained. No information was identified regarding the provenance of the screen.

The bathrooms show signs of original features such as urinal and partial marble wall covering but the space has otherwise been stripped and damaged. There are also more modern finishes partially intact from remodels.

The Grand Theater was reopened in 1980 and intended to be used for a wide variety of uses for both the campus and the community, including small group meetings and group lectures, examinations and films, large theater productions, film festivals, and graduations.

As noted above, the Grand Theater of the Magnolia Hall Complex is connected to the East Classroom Building. When a seismic retrofit of the East Classroom building was undertaken in 2014, it required the strengthening of one wall of the audience area of the Grand Theater. Concrete columns were added along a section of the south wall. These columns remain exposed along that side wall. This wall area was not finished, and these raw pillars remain exposed. These unfinished concrete pilasters are flush to the finished face at the lower level and protrude into the original space in the upper level above the balcony trim line. There is also evidence of earlier Fields Act seismic upgrade around the stage area and control room.

¹⁸ *Los Angeles Trade Technical College EIR, 2003, p. 108.*

The Grand Theater building exterior is a modest example of the Moorish architectural style. The building has limited architectural details of the style: there are no domes or minarets, no mosaic tile trim, no tile cladding. The building has some remaining concrete screens with a geometric motif, and it appears that there were panels above the doors, likely with some sculptural or relief decoration, that were removed in the past. The stucco exterior is not original having had its original exterior finish covered with gunnite.

While some original decorative features remain, most finish surfaces of the Grand Theater are significantly deteriorated. While decorative shapes and trims are visible, highly decorated surfaces are significantly deteriorated with staining, flaking and other erosion and disruption of the finish surface. The building interior today is a mix of some residual features from the original design of the Auditorium and the features and finishes added to the interior in the 1978 remodel from a high school auditorium to a “Grand Theater.” The period of operation of the Grand Theater remodel that includes the majority of the Grand Theater interior is less than 50 years, with operations ending in 2009.

Previous Surveys

The *Los Angeles Technical College 2003 Campus Plan Final Environmental Impact Report* evaluated all campus buildings for their potential historic significance. The *2003 Campus Plan EIR* identified two buildings and one landscape feature as potential historic resources: 1) Building A, the complex of buildings today known as Magnolia Hall that includes the 1924 Auditorium (Grand Theater), 1925 classroom wing and the 1935 classroom building; 2) Building C, today known as Redwood Hall or the Tom Bradley Center for Student Life; and 3) the Mature Fig Tree. These were evaluated as historic status code 5S1 “eligible for local listing only; listed or eligible separately under a local ordinance.” No other campus buildings, structures or landscape features were found eligible for historic designation.

Determination of Existing Significance

Magnolia Hall Complex (including the Grand Theater Building)

The current Historic Resource evaluation (KCK, August 2019) finds that the Magnolia Hall Complex, including the Grand Theater building is not eligible for the National Register of Historic Places or the California Register of Historical Resources under any of the four criteria (see above discussion of Regulatory Background for the criteria and Appendix B for a detailed discussion of each):

Association with events: Although many events took place in the Auditorium of Magnolia Hall (now the Grand Theater), the assemblies and gatherings were typical of those of other high school and community/junior college auditoriums. Events included graduations, entertainment, lectures, and general assemblies of the school and of other organizations. Providing space for school and neighborhood assemblies does not automatically qualify an assembly hall or function rooms as historically significant. There is no evidence that any historic events took place in the building. In addition, in the 1970s the interior of the building was significantly renovated and upgraded from that for new commercial uses as well as for use by the college. During the short period of use as a commercial venue no significant events took place in the Grand Theater.

Association with the lives of persons significant in our past: While Mayor Bradley achieved some status as the student body president (which in retrospect illustrates his interest in politics), the work that defined his historic significance was accomplished during his years serving as the Mayor of Los

Angeles. There is no evidence of any faculty or staff member of the Polytechnic High School achieved historic significance based on their work at the school. There is no evidence that anyone who was connected with the buildings of Magnolia Hall when it was the Polytechnic High School or Los Angeles Trade Technical College (previously the Frank Wiggins Trade School) achieved historic significance based on the work they did in the buildings of Magnolia Hall.

Embodiment of distinctive characteristics: The Auditorium of Magnolia Hall (now the Grand Theater) was designed by the architectural firm of Morgan, Walls and Clements. It appears that Stiles O. Clements was the principal in charge of the building's design as he was the spokesperson for the project as published in local newspapers. Clements is considered a master architect who designed buildings in numerous styles. One of his most recognized designs employed a related exotic architectural style, the Assyrian inspired Sampson Tyre and Rubber company factory. The building has been impacted by the loss of some features and application of a gunite exterior. The interior of the building was significantly altered and changed from a high school auditorium into an embellished theater. Although the building was designed by master architect, Stiles O. Clements, the building is not an excellent example of the Moorish architectural style or of the work of Stiles O. Clements or of Morgan, Walls and Clements' body of work.

Information important in prehistory or history: The property was constructed during historic times, so the buildings on the property will not yield information important to the prehistory or early history of the area, state or nation.

The Grand Theater Building is considered to be potentially eligible for local historic status (City of Los Angeles Historic-Cultural Monument), under two of three criteria:

Los Angeles Historic-Cultural Monument (HCM) Criterion 1: "Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, or local history."

Although the level of integrity required may be lower for local landmark eligibility, the interior of the building has been altered from a high school auditorium. The classroom wings of Magnolia Hall are not the original Polytechnic High School classrooms. There is no evidence that the classrooms are any more significant than those of any others in the Los Angeles school system. However, as Magnolia Hall consists of three of the only four buildings remaining from the period when the campus functioned as the Los Angeles Polytechnic High School, the buildings of Magnolia Hall complex may be eligible under Los Angeles HCM Criterion 1 as the only remaining buildings from the Polytechnic High School era. Magnolia Hall Complex appears to reflect or exemplify the significant contributions to broad social history of the community.

Los Angeles Historic-Cultural Monument (HCM) Criterion 3: "Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose individual genius influenced his or her age."

The Washington Boulevard exterior elevations of the Magnolia Hall complex, the East and West Classroom Buildings and the Auditorium (now the Grand Theater), represent the second era of Polytechnic High School buildings and they retain a sufficient amount of architectural integrity and interest to be determined eligible as a City of Los Angeles Historic-Cultural Monument. The 2003

LATTC Campus Plan FEIR found that the Magnolia Hall complex embodies “certain distinguishing characteristics of an architectural type.” Many of the exterior Moorish decorative architectural features have been removed. The interior of the building also was altered when it was changed from a high school auditorium into theater for commercial use. While these losses have occurred, overall, the building retains its original architectural form and basic features of the Moorish architectural style and thus appears to meet the criterion to be eligible under Los Angeles Historic-Cultural Monument Criterion 3.

The East Classroom building and the West Classroom building exteriors are examples of the Renaissance Revival architectural style and appear to retain enough architectural integrity to be considered eligible under HCM Criterion 3.

The Grand Theater Building is not considered to be potentially eligible for local historic status (City of Los Angeles Historic-Cultural Monument), under one of three criteria (see above discussion of Regulatory Background for the criteria and Appendix B for a detailed discussion of each):

Los Angeles Historic-Cultural Monument (HCM) Criterion 2: “Is associated with the lives of historic personages important to national, state, city, or local history”. There is no evidence that the buildings of Magnolia Hall are associated with an historic person. While Los Angeles Mayor Tom Bradley was an athlete and the first Black student body president at the Polytechnic High School, there is no evidence that the buildings of Magnolia Hall were the buildings associated with his school career. There is no evidence that any other students, faculty or staff of the Polytechnic High School or the later Los Angeles Trade Technical College are associated with the buildings of Magnolia Hall. Thus, the buildings of the Magnolia Hall complex do not meet Los Angeles HCM Criterion 2.

The mature Fig Tree in the Magnolia Hall courtyard area may also be eligible for designation as a City of Los Angeles Historic-Cultural Monument because of its association with the early Los Angeles Polytechnic High School campus, its age, and type. The Fig Tree will not be impacted by the Grand Theater demolition.

An analysis of the integrity of the Grand Theater building indicates: 1) *Location* – the Grand Theater remains in its original location; 2) *Design* -- the exterior of the Grand Theater building retains poor to fair integrity of design, the design of the interior of the Grand Theater has undergone major alterations; 3) *Setting* -- the setting of the area, with the exception of the 1925 and 1935 Classroom buildings has been substantially altered; 4) *Materials* -- the Grand Theater building exterior has been re clad with gunnite over the original stucco and the interior, while some original materials remain, has a poor to fair level of integrity with respect to original historic materials; 5) *Workmanship* – the workmanship of the exterior is typical of the period of construction, however, it is not exceptional; 6) *Feeling*-- the front elevations of the Magnolia Hall Complex including the Grand Theater, along Washington Boulevard, convey the historic character of the second era of the Los Angeles Polytechnic High School, the rear elevations is not representative of the period, the interior of the Grand Theater was remodeled from a high school auditorium to a “grand theater” and the interior no longer feels like a 1920s high school auditorium but rather as an unused commercial theatrical venue; 7) *Association* -- the buildings of the Magnolia Hall Complex (including the Grand Theater) do not have any direct link to any historic events or persons.

Historic District

The current Historic Resource evaluation (KCK, August 2019) finds that there is not an eligible historic district on the LATTC Campus.

The only buildings from the Polytechnic High School period of significance (1905-1957) are the buildings of the Magnolia Hall Complex and Redwood Hall. Each of these buildings appear eligible as individual City of Los Angeles Historic-Cultural Monuments. However, the buildings do not create an historic district. The North Quad and the Magnolia Hall courtyard are recent landscape designs completed in the 21st Century and are the result of demolition of Polytechnic High School campus buildings.

The Los Angeles Trade-Technical College period begins in 1957. Of the 12 buildings on campus constructed since 1957, five of the buildings, Toyon Hall, Cedar Hall, Mariposa Hall, Aspen Hall and Juniper Hall are less than 50 years old.

Two buildings, Sage Hall (1961) and Cypress Hall (1964), are located in the far northeast end of the campus, along Grand Avenue. On the west side of campus, at the north end of Flower Street is Oak Hall (1966), a long utilitarian building that is attached to the Receiving Center and has a parking lot on its roof. At the far southwest end of the campus along Flower Street are three buildings: Sequoia Hall (1961), Willow Hall (1966) and Laurel Gymnasium (1968).

These two clusters of 1960s era buildings are at opposite ends of the campus. In between them is the center of campus which contains Mariposa Hall, the large building that contains the library. Mariposa Hall was constructed in 1979 and had a major exterior renovation in 2014. To the east of Mariposa Hall are two higher rise buildings, Aspen Hall and Juniper Hall which were built in 2009. The area to the east of the Sequoia Hall/Willow Hall/Laurel Gymnasium cluster is a large area that is currently a construction site.

The newer buildings of the LATTC era on the south side of campus and Mariposa Hall in the middle of the campus, create a physical and visual barrier between the two clusters of 1960s era buildings (those on the northeast side of campus and those on the southwest side of campus). The separation of the two clusters of 1960s era buildings is so great that there is no identifiable, visual connection between the two clusters. Thus, there is no eligible historic district on the campus of Los Angeles Trade Technical College.

IMPACT ANALYSIS

Significance Thresholds

The State of California CEQA Guidelines (defined in §15064.5) and the City of Los Angeles CEQA Thresholds Guide provide technical guidance regarding evaluation of impacts to historical resource. Any project that would physically detract, either directly or indirectly, from the integrity and significance of a historic resource such that its eligibility for inclusion on the National Register of Historic Places, the California Register of Historical Resources or as a City of Los Angeles Historic-Cultural Monument, such that the resource would lose its historic eligibility, would be considered to be a significant adverse impact on that historical resource.

The State of California *CEQA Guidelines* (§15064.5(b)) state that a substantial adverse change to the historical significance of a resource occurs in the following situations:

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- The significance of an historical resource is materially impaired when a project:
 - A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
 - B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code (PRC) or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
 - C. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The City of Los Angeles *CEQA Thresholds Guide* indicates that a project would have a significant impact on a significant historical resource if the project would cause a substantial change in the significance of the historical resource as defined in Section 15064.5 of the State of California *CEQA Guidelines* when one or more of the following occurs:

- Demolition of a significant resource that does not maintain the integrity and significance of a significant resource.
- Relocation that does not maintain the integrity and significance of a significant resource.
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.
- Construction that reduces the integrity of significance of important resources on the site or in the vicinity.

Analysis

The demolition of the Grand Theater (the Auditorium section of Magnolia Hall) is proposed. Landscaping and a new campus entry would replace the Grand Theater.

In 1978 the assembly hall of the Auditorium portion of the Magnolia Hall Complex (now the Grand Theater) underwent a major renovation that altered the high school auditorium into a theater. The renovation

removed/changed interior auditorium features and added embellishments representative of a theater rather than a high school auditorium. The 1978 renovation is less than 50 years old and was in operation for less than 30 years. The renovated theater does not meet historic eligibility criteria as discussed in the Evaluation Section above.

Any programmatic decision about future use of the Grand Theater portion of the Magnolia Hall Complex would have to consider whether to take it back to use as a 1920's era school auditorium (it was not a major theatrical facility) or to follow the path taken in the late 1970s to elevate the auditorium into a theater. The current LATTC Campus is a technical college and no longer a high school, so the historic use of a high school assembly auditorium is no longer a programmatic need. If renovated again into a theater, that renovation would not meet the Secretary of the Interior's Standards for Rehabilitation as the theater renovation and use was outside of the period of significance during which the Grand Theater was part of Polytechnic High School. Moreover, the College could not expend bond funds or other monies on renovating the Grand Theater since a theater does not have an academic purpose linked to the College's mission.

Although the exterior of the Grand Theater portion of the Magnolia Hall Complex has lost character-defining features the building retains enough integrity to be eligible for designation as a City of Los Angeles Historic Cultural Monument. Thus, demolition of the Grand Theater is considered significant.

MITIGATION MEASURES

The following mitigation measures would reduce impacts of demolition but not to a less than significant level.

- HR-1 HABS Historic American Building Survey Level 2 Photographic Documentation.** HABS level 2 documentation shall be undertaken for the buildings of the Magnolia Hall complex. Level 2 requires archival quality large format negatives and prints of exterior and interior views of the subject buildings. The negatives and archival prints shall be deposited into an archive collection of LATTC history. Also, an electronic copy of the photographs shall be made and deposited with the LATTC archive collection and another electronic copy deposited with the Los Angeles Public Library.
- HR-2 Establish and Maintain LATTC History Archive.** LATTC shall develop a repository/archive collection within their library to contain materials regarding the history and use of the campus as the site of the Polytechnic High School and as LATTC. An historic preservation specialist shall be retained to help establish this archive.
- HR-3 Salvage.** Some historic building materials that are not contaminated by hazardous materials (including lead and asbestos) will be salvaged and offered to the public for reuse.
- HR-4 East Classroom Wall.** Finish the East Classroom wall in a manner compatible with the rest of the building consistent with the Secretary of Interior's Standards.

3.1.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measures **HR-1** through **HR-4** would help to minimize the potential impact on this building; however, potential impacts would remain significant and unavoidable.

4.0 ALTERNATIVES

INTRODUCTION

The 2005 FEIR evaluated three alternatives: No Project, Reduced Density and No Property Acquisition. These alternatives represent a reasonable range of alternatives for a Facilities Master Plan. The following analysis supplements the 2005 FEIR alternatives analysis by focusing on only the currently proposed demolition of the Grand Theater building and only the historic resource impacts. The No Project Alternative and the Rehabilitation Alternative address only the Grand Theater building both alternatives could be a part of any 2005 FEIR alternative.

The Grand Theater is located immediately adjacent to the rehabilitated East Classroom Building. In the event of an earthquake the Grand Theater building in its current condition represents a hazard to the East Classroom Building. Demolition is proposed to remove that hazard. There are no plans to replace the Grand Theater building area as there is no demand for an auditorium/theater space.

Demolition of the Grand Theater building would address objectives of the Facilities Master Plan related to maximizing efficiency of land area and providing for core curriculum and program opportunities (by removing inefficient space that does not serve core programs) as well as maximizing available outdoor open space and promoting a college-like feel and an element of tranquility. The project would result in efficient use of funds and retention of funds to further the Trade-Tech educational program.

NO PROJECT ALTERNATIVE

Description

The No Project Alternative would result in no changes to the Grand Theater building.

Analysis

This alternative would preserve the Grand Theater for the short term. The Grand Theater would remain in its current state of disrepair and would continue to represent a hazard to the East Classroom Building in the event of an earthquake. In the short-term the building would be preserved and therefore the impact would be less than the project and also less than significant. Notwithstanding the foregoing, however, the potential would remain that during an earthquake or fire the Grand Theater could lead to serious damage the East Classroom building, itself an historical resource.

Over the longer term the building would further degrade due to the passage of time, deferred maintenance and need for rehabilitation. The technical feasibility and cost of rehabilitation and/or replacing materials would become more challenging, likely resulting in the same impacts as the proposed project (i.e., loss of both buildings).

Relationship to Project Objectives

The No Project Alternative does not meet objectives of the Facilities Master Plan to maximize efficiency of land area, maximize available outdoor open space, or provide core curriculum opportunities and promote a college-like feel. The Grand Theater represents a hazard to the East Classroom Building in the event of a fire or an earthquake, if the building is not demolished the hazard would remain. In addition, the building is deteriorating and may become a hazard to passersby in the event of an earthquake.

REHABILITATION ALTERNATIVE

Description

The Rehabilitation Alternative consists of rehabilitation of the Grand Theater in accordance with the Secretary of the Interior's Standards – to the extent feasible. Interpretation of consistency with the Secretary of the Interior's Standards is flexible and would have to be undertaken as rehabilitation proceeded.

The State Historic Building Code (SHBC) allows for some exemptions from current building codes, including seismic retrofit requirements and Americans with Disability Act (ADA) access requirements for qualified properties on a case-by-case basis. However, school buildings are considered essential services buildings when it comes to seismic safety (similar to hospitals).

Rehabilitation of the Grand Theater building would require that it be seismically retrofitted, likely in a manner similar to or more extensively than the Magnolia Hall East Classroom Building (see **Appendix C Structural Evaluation Report**). The following elements of rehabilitation would be required for the Grand Theater (not taking in to account the most recent Building Code updates):

1. Concrete and structural reinforcement.
2. Structural steel and other metal work.
3. Metal stud framing/dry wall.
4. New flooring.
5. New roof.
6. Replacement doors and windows.
7. New tile finishes.
8. New plumbing, including new fire sprinkler system.
9. New HVAC system
10. New audio-visual systems and rigging.
11. ADA improvements including wheelchair lifts.
12. Addition of thermal and moisture protection throughout.
13. New electrical systems throughout.
14. Painting and window treatments.

LACCD has undertaken a cost estimate in order to understand the costs to seismically upgrade and renovate the Grand Theater. The cost of seismic upgrades alone is estimated at \$40 million. The cost to fully renovate the theater back to theater use is estimated at \$70 million (including the seismic upgrades). The cost to renovate the building for adaptive reuse to a building that could have some use by the college (although it would be without windows) is estimated at \$90 million. As a state-funded public agency, LACCD cannot expend funds on projects that have no educational purposes for the institution. Here, the College curriculum does not require a theater and thus LACCD would be unable to secure funding to undertake these essential life safety rehabilitative measures.

Recent building code updates added new seismic retrofit requirements starting in 2020. Seismic retrofit requires extensive interventions with building structure even for historic structures in order to ensure the safety of future occupants (see photograph below of East Classroom wall visible inside the Grand Theater which would likely require further structural support to comply with current codes).



Photograph showing structural support of East Classroom Building visible inside the Grand Theater.

LACCD is committed to student safety in their buildings and requires that as buildings are constructed and/or rehabilitated that they meet appropriate safety standards. It is anticipated that the Division of the State Architect (DSA), the agency that permits school buildings, will require the building to be substantially brought up to current codes with respect to structure (seismic safety), accessibility and fire and life safety. While the Historic Building Code can be used to provide alternative interpretations of code requirements, in the case of a school structure, it is the LACCD team's experience that DSA is inflexible and full code compliance is typically required.¹ Seismic strengthening is anticipated to require extensive new concrete structure support. Such new concrete supports can be camouflaged but nonetheless they would further impact the historic integrity of the structure.

Even if there were activities that could occur in the building (large scale lectures) such use would be infrequent and would not be cost effective.

Analysis

The Grand Theater appears to meet the Los Angeles Historic-Cultural Monument (HCM) Criteria 1 and 3 and therefore would be eligible for designation as a City of Los Angeles Cultural Monument:

Criterion 1: *"Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, or local history."*

Magnolia Hall consists of three of the only four buildings remaining from the period when the campus functioned as the Los Angeles Polytechnic High School.

Criterion 3: *"Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose individual genius influenced his or her age."*

With respect to the Grand Theater, the Washington Boulevard exterior elevations represent the second era of Polytechnic High School buildings in the Magnolia Hall complex and retains a sufficient amount of architectural integrity and interest. The Grand Theater exterior is an example of the Moorish architectural style and the East Classroom building and the West Classroom building exteriors are examples of the Renaissance Revival architectural style.

While the Grand Theater building has been substantially changed over the years, because the City of Los Angeles HCM ordinance is silent regarding integrity, loss of character-defining features on a building is not necessarily fatal to a building being considered a City of Los Angeles Historic-Cultural Monument.

Rehabilitation of the building would require extensive support of the existing structure (construction of new concrete walls interior to the building), and extensive rehabilitation, replication and/or reconstruction of interior finishes. Nonetheless, rehabilitation of the Grand Theater in accordance with Secretary of the Interior's Standards would reduce the potential impact to historical resources potentially to a less than significant level. As noted above the City of Los Angeles HCM ordinance does not require that all

¹ Don McLarty, AIA, NCARB, LEED-AP, LACCD Planning and Support Services Manager, letter dated July 8, 2022.

character-defining features be retained in order for a building to be considered eligible to be an HCM. Also, the Secretary of the Interior's Standards allow for flexibility in code compliance requirements. A project that has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties can generally be considered to be a project that will not cause a significant impact (14 CCR § 15126.4(b)(1)). However, the feasibility of retaining sufficient integrity to the building to meet the Secretary of the Interior's Standards while addressing seismic safety requirements especially in meeting requirements of DSA is unknown and could only be determined after detailed evaluation and negotiations.

Relationship to Project Objectives

Rehabilitation was rejected based on the following:

Grand Theater

- LATTC does not have need for an auditorium or theater space and therefore a rehabilitated building would receive little if any use by the college and such rehabilitation would not further objectives of the Facilities Master Plan.
- The Grand Theater does not complement the desired modern campus design aimed at technical students and the existing mostly window-less frontages are not pedestrian friendly.
- The Grand Theater represents a hazard to the East Classroom Building in the event of an earthquake or fire; if the building is not demolished the hazard would remain.
- While the building has historic eligibility due to its association with the Polytechnic High School, the interior and exterior condition of the building have changed substantially over time such that rehabilitation would be technically challenging and expensive. LACCD has already rehabilitated two of the four buildings associated with the Polytechnic High School, so Polytechnic High School-era buildings would still remain.
- The Grand Theater was constructed before current seismic codes and requires substantial seismic retrofit that would be technically challenging and expensive as well as disruptive of the historic fabric.
- Given constrained budgets for the campus, costly rehabilitation of the building (which would have little if any functionality for the college) would prevent the college from implementing other programs and constructing other buildings more functional and consistent with its mission and the Facilities Master Plan objectives. LATTC has a great need for replacement of seriously outdated and dysfunctional classroom, instructional and laboratory space. The need to replace that space is more than it has funds to undertake.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

A comparison of impacts of the project and alternatives addressed in this Supplemental EIR is shown in **Table 5-1**. The 2005 FEIR identified an environmentally superior alternative — the Reduced Density Alternative. Either of the above alternatives could be added to the Reduced Density Alternative. The Rehabilitation Alternative above combined with the 2005 FEIR Reduced Density Alternative would result in the fewest impacts but would not fully address objectives for the College and is financially infeasible given the lack of funding sources.

Table 2: Comparison of Alternatives -- Historic Impacts on the Grand Theater			
Issue	Project	No Project Alternative	Rehabilitation Alternative
Historical Resource – Magnolia Hall – Grand Theater/ Auditorium	Demolition of the resource would result in a significant unmitigated adverse impact.	Retention of the resource would result in a less than significant impact in the short term, but continued deterioration would impact the building and the building would remain a threat to the East Classroom Building which would be a significant unmitigated adverse impact.	Rehabilitation of the building in accordance with the Secretary of the Interior's Standards would result in a less than significant impact. However, the feasibility of meeting these standards while at the same time addressing seismic safety requirements to the satisfaction of the Department of the State Architect (DSA) is unknown.

5.0 REPORT AUTHORS AND CONSULTANTS

LEAD AGENCY

Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Dr. Reuben Smith, Chief Facilities Executive
Dr. Katrina VanderWoude, Los Angeles Trade-Technical College, President
Duy Doan, College Project Director, Build LACCD

EIR CONSULTANTS

Sirius Environmental
1478 N. Altadena Drive
Pasadena, CA 91107
Wendy Lockwood, Project Manager

HISTORIC CONSULTANTS

Kaplan Chen Kaplan
Architects and Planners
2526 Eighteenth Street
Santa Monica, CA 90405
David Kaplan, Principal Preservation Architect
Pam O'Connor, Principal Historian