
APPENDIX B-2.
FRANKLIN HISTORICAL RESOURCES
TECHNICAL REPORT

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Franklin Elementary School | Santa Monica, CA

Historical Resources Technical Report

Prepared for:

Santa Monica-Malibu Unified School District
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1. Introduction

1.1. Report Overview

At the request of the Santa Monica-Malibu Unified School District (SMMUSD, or the District), Architectural Resources Group, Inc. (ARG) has prepared this Historical Resources Technical Report for a proposed facilities project (the Project) at Franklin Elementary School in Santa Monica (the Project Site), located at 2400 Montana Avenue in Santa Monica.¹

The Project Site is an elementary (K-5) school campus comprising seven permanent buildings, two modular structures, and eight modular structures with a combined total of approximately 68,387-square-feet of building area. The campus also contains landscaping, open spaces for recreation, and a small surface parking lot. Next to (to the east of) the main campus is a satellite campus that is used as a kindergarten facility. The permanent buildings were constructed between 1937 and 1952, and their construction was funded in part by the federal Works Progress Administration (WPA). The portable and modular structures were installed between 1973 and 2002 to accommodate additional growth.

In 2019, the District adopted Districtwide Educational Specifications to provide guidance on developing future learning environments in a manner consistent with the demands of twenty-first century instructional design.² Following adoption of the Educational Specifications, the District assessed the Franklin Elementary School campus and identified priority and future improvements which, when implemented, are intended to bring the campus into conformance with the Educational Specifications.

The Project includes various improvements at Franklin Elementary School to meet the Educational Specifications. The Project would result in the demolition of all portable and modular structures and one permanent building; construction of three new buildings; and renovation of two buildings and outdoor areas on the main campus and the adjacent satellite campus. The Project would result in an increase of the campus building area by approximately 24,685 square feet, and would provide larger and more flexible classroom and teaming spaces. The Project would be implemented in five phases between 2023 and 2032. The District is proceeding with planning and design of the first phase of the Project, which is funded through a voter-approved general obligation bond called Measure SMS; other phases would be completed at later dates and at the District's discretion as funding becomes available.

The purpose of this Historical Resources Technical Report is to fulfill the requirements of the California Environmental Quality Act (CEQA) as they relate to historical resources. As described in the CEQA Guidelines, "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."³ This report evaluates the impacts of the aforementioned Project on historical resources at the Franklin Elementary School campus.

The analysis herein is predicated on the findings of a Historic Resources Inventory (HRI) for the Franklin Elementary School campus, which was completed by ARG in 2022. The HRI was prepared to comply with

¹ The Assessor Identification Number (AIN) associated with the property is 4277.002.901.

² Santa Monica-Malibu Unified School District, "Districtwide Educational Specifications," prepared by CannonDesign, Mar. 2019.

³ California Public Resources Code, Section 21084.1.

Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021. BP 7113 and AR 7113 require the District to identify and evaluate potential impacts to historical resources on its campuses prior to approving a master plan or school facilities project.

The HRI identified one eligible historical resource on the Franklin Elementary School Campus: Building B (including its landscape), which was found to be individually eligible for listing in the California Register of Historical Resources and for local (Santa Monica) Landmark designation. Building B meets the definition of a “historical resource” for purposes of CEQA, as well as per the definition in BP 7113/AR 7113.

No other buildings or improvements on the Franklin Elementary School campus were identified as potential historical resources through the HRI.

The Project Site also falls within the boundaries of the potential Montana Avenue Multi-Family Residential Historic District, which was identified as a potential historic district through the City of Santa Monica’s Historic Resources Inventory (most recently updated in 2018). The potential district is not designated. The Project Site was found to be a non-contributor to the potential district through the City of Santa Monica’s HRI because it does not relate to the residential context of the potential district.

In summary, ARG arrives at the following conclusions:

- The Project will not result in direct impacts to historical resources. It will not demolish or materially impair the significance of Building B, which is a historical resource, and will not cause a substantial adverse change to the significance of the historical resource. Building B will retain its character-defining features and will continue to retain sufficient integrity to convey its historical and architectural significance upon completion of the Project. Building B will thus continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at Project completion. In addition, the Project will not compromise the significance or integrity of the potential Montana Avenue Multi-Family Residential Historic District, within which the Project Site is located. The Project would not result in the demolition or material impairment of the potential district. The potential district will continue to be eligible for local Landmark designation at Project completion.
- The Project will not result in indirect impacts to historical resources since there are no historical resources located adjacent to⁴ the Project Site.

The following sections include a detailed discussion of how these determinations were made.

⁴ For purposes of this analysis, “adjacent” refers to designated and potential historical resources that are located directly next to, or in direct view of, the Project Site.

1.2. Field and Research Methods

Preparation of this report included the following tasks related to research, documentation, and analysis:

- Review of the CEQA Guidelines and other applicable state and federal technical bulletins, regulatory guidelines, and reference materials related to the evaluation of historical resources.
- Review of previous studies and documentation related to historical resources at the Project Site, including the HRI for Franklin Elementary School (ARG, 2022).
- Review of plans, renderings, and associated documentation related to the proposed Project (dsk architects, 2022).
- Participation in meetings and public outreach activities with community members, local history groups, and other stakeholders, coordinated by the District.
- Summarization of historical resources present on the Franklin Elementary School campus and its immediate environs.
- Analysis of potential impacts to historical resources in accordance with significance thresholds in Section 15064.5 of the CEQA Guidelines (Cal. Code of Regs., Title 14, §15000, et seq).

Research conducted for purposes of this report was informed by the same source materials that are referenced in the HRI for Franklin Elementary School. These include the Los Angeles Public Library; the Santa Monica Public Library, including its local history collection; archival plans and construction records provided by the District; building permit records obtained from the City of Santa Monica Community Development Department; technical assistance bulletins published by the National Park Service (NPS) and California Office of Historic Preservation (OHP); online research repositories; and ARG's in-house library of architectural books and reference materials. Additional research materials, including historic photographs and other materials related to the history of the District and the Project Site, were provided courtesy of the Santa Monica Conservancy. For a complete list of sources, refer to Section 8: *Selected Bibliography*.

1.3. Preparer Qualifications

This report was prepared by ARG staff Katie E. Horak, Principal, and Andrew Goodrich, AICP, Senior Associate, both Architectural Historians and Preservation Planners who meet the *Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the discipline of Architectural History.⁵

⁵ Staff resumes are included as an appended to this report.

2. Regulatory Environment

2.1. National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's master inventory of known historic resources. Established under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Eligibility for listing in the National Register is addressed in National Register Bulletin (NRB) 15: *How to Apply the National Register Criteria for Evaluation*. NRB 15 states that in order to be eligible for the National Register, a resource must both (1) be historically significant, and (2) retain sufficient integrity to adequately convey its significance.

Significance is assessed by evaluating a resource against established eligibility criteria. A resource is considered significant if it satisfies any one of the following four National Register criteria:⁶

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B (persons): associated with the lives of significant persons in our past.
- Criterion C (architecture): embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.
- Criterion D (information potential): has yielded or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or *integrity* – to convey its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics.

Generally, if a resource is recognizable as such in its present state, it is said to retain integrity; if it has been extensively altered, then it does not. Whether a resource retains sufficient integrity for listing is determined by evaluating the seven aspects of integrity defined by the NPS:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Setting (the physical environment of a historic property);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);

⁶ Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
- Feeling (a property's expression of the aesthetic or historic sense of a particular period of time);
- Association (the direct link between an important historic event/person and a historic property).

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a “yes” or “no” determination: a resource either retains integrity, or it does not.⁷ Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for the resource's significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been concluded that the resource is in fact significant.

2.2. California Register of Historical Resources

The California Register of Historical Resources (California Register) is an authoritative guide used to identify, inventory, and protect historical resources in California. Established by an act of the State Legislature in 1998, the California Register program encourages public recognition and protection of significant architectural, historical, archeological, and cultural resources; identifies these resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

The structure of the California Register program is similar to that of the National Register, though the former more heavily emphasizes resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant under one of the following four criteria, which are modeled after the National Register criteria listed above:

- Criterion 1 (events): associated with events or patterns of 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;
- Criterion 2 (persons): associated with the lives of persons important to local, California, or national history;
- Criterion 3 (architecture): 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;
- Criterion 4 (information potential): has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

Like the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for

⁷ Derived from NRB 15, Section VIII: “How to Evaluate the Integrity of a Property.”

the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.⁸

Certain properties are automatically listed in the California Register, as follows:⁹

- All California properties that are listed in the National Register;
- All California properties that have formally been determined eligible for listing in the National Register (by the State Office of Historic Preservation (OHP));
- All California Historical Landmarks numbered 770 and above; and
- California Points of Historical Interest which have been reviewed by the State Office of Historic Preservation and recommended for listing by the State Historical Resources Commission.

Resources may be nominated directly to the California Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register. There is no prescribed age limit for listing in the California Register, although OHP technical assistance guidelines state that resources less than 50 years old may be considered for listing as long as sufficient time has have passed “to obtain a scholarly perspective on the events or individuals associated with the resource.”¹⁰

2.3. City of Santa Monica Landmarks and Historic Districts Ordinance

Historic preservation in Santa Monica is governed by Chapter 9.56 (Landmarks and Historic Districts Ordinance) of the Santa Monica Municipal Code. The Ordinance was adopted by the Santa Monica City Council on March 24, 1976, and was amended in 1987 and again in 1991.¹¹ Its current version was adopted in 2015. Among the primary objectives achieved by the Ordinance was the creation of a local designation program for buildings, structures, sites, objects, districts, and landscapes in the City that are of historical significance.

With respect to individually significant properties, the Ordinance distinguishes between two tiers of designation: Landmarks and Structures of Merit. Landmarks, outlined in §9.56.100, are considered to exhibit “the highest level of individual historical or architectural significance”; Santa Monica’s designated landmarks include well-known and highly significant properties like the Rapp Saloon, Santa Monica City Hall, and the John Byers Adobe. Structures of Merit, outlined in §9.56.080, possess a degree of individual

⁸ California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 2.

⁹ California Public Resources Code, Division 5, Chapter 1, Article 2, § 5024.1.

¹⁰ California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

¹¹ City of Santa Monica General Plan, “Historic Preservation Element,” prepared by PCR Services Corporation and Historic Resources Group (September 2002), 1-2.

significance that is more limited in scope.¹² Protections against demolition and alterations are commensurate with the tier of individual designation assigned to a particular resource.

Landmarks are sited on Landmark Parcels. §9.56.030 defines a Landmark Parcel as “any portion of real property, the location and boundaries as defined and describes by the Landmarks Commission, upon which a Landmark is situated, which is determined by the Landmarks Commission as requiring control and regulation to preserve, maintain, protect or safeguard the Landmark.”¹³

In addition to individual Landmarks and Structures of Merit, the Ordinance establishes statutory criteria and procedures for the designation of Historic Districts, defined in §9.56.030 as a “geographic area or noncontiguous grouping of thematically related properties” that collectively contribute to the historic character of an area within the City. Unlike individual properties, whose designation does not require owner consent and is approved by the City’s Landmarks Commission, Historic Districts must win the support of a majority of property owners within the district and be approved by the City Council.¹⁴

Per §9.56.100(A) of the Ordinance, a property merits consideration as a Landmark if it satisfies one or more of the following six statutory criteria:

- (1) It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political, or architectural history of the City
- (2) It has aesthetic or artistic interest or value, or other noteworthy interest or value
- (3) It is identified with historic personages or with important events in local, state, or national history
- (4) It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail, or historical type valuable to such a study
- (5) It is a significant or a representative example of the work or product of a notable builder, designer, or architect
- (6) It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City

2.4. CEQA and Historical Resources

Enacted in 1970, CEQA is the principal statute mandating environmental assessment of discretionary land use and development projects in California. The primary goal of CEQA is to (1) evaluate a project’s potential to have an adverse impact on the environment, and (2) minimize these impacts to the greatest

¹² City of Santa Monica Planning and Community Development Department, “Historic Preservation in Santa Monica,” accessed 8 August 2014, <http://www.smgov.net/departments/PCD/Programs/Historic-Preservation/>.

¹³ Santa Monica Municipal Code, Chapter 9.36.030 (Definitions), accessed Jan. 2019.

¹⁴ Ibid.

extent feasible through the analysis of project alternatives and, if needed, implementation of mitigation measures.

Historical resources are considered to be a part of the environment and are thereby subject to review under CEQA. Section 21084.1 of the California Public Resources Code (PRC) states that for purposes of CEQA, “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”¹⁵ This involves a two-part inquiry. First, it must be determined whether the project involves a historical resource. If it does, then the second part involves determining whether the project may result in a “substantial adverse change in the significance” of the historical resource.

To address these issues, guidelines relating to historical resources were formally codified in October 1998 as Section 15064.5 of the California Code of Regulations (CCR), Title 14, Chapter 3. The guidelines state that for purposes of CEQA compliance, a “historical resource” shall be defined as any one of the following:¹⁶

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources.
2. A resource included in a local register of historical resources, or identified as significant in a qualified historical resource survey, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrate that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources.

Once it has been determined that a historical resource is present, it must then be determined whether the project may result in a “substantial adverse change” to that resource. Section 5020.1. of the PRC defines a substantial adverse change as the “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.” Furthermore, according to Title 14 of the California Code of Regulations (CCR), the significance of a 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

¹⁵ California Public Resources Code, Section 21084.1.

¹⁶ California Code of Regulations, Title 14, Chapter 3, Section 15064.5.

- 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 or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, 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 a 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.

In most instances, a project that follows the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*¹⁷ shall be considered as mitigated to a level of less than a significant impact on the historical resource.¹⁸

¹⁷ Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Revisions to Kay D. Weeks and Anne E. Grimmer, 1995), Washington, D.C.: U.S. Department of the Interior, National Park Service, Technical Preservation Services, 2017, 76, accessed September 2022, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

¹⁸ California Code of Regulations, Title 14, Chapter 3, Section 15064.5.

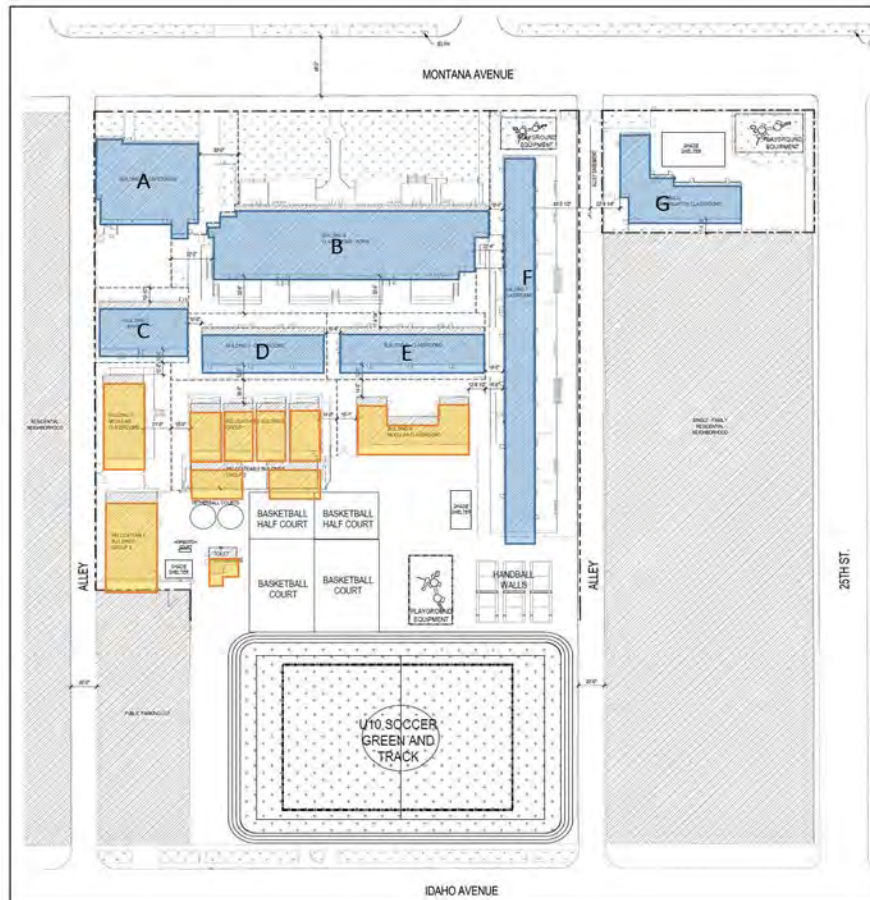
3. Existing Conditions

The Project Site is an elementary (K-5) school campus that is located in the northeast section of Santa Monica. The campus occupies an approximately 5.6-acre site that is bounded by Montana Avenue (north), Idaho Avenue (south), 23rd Place (west) and 24th Place (east). Next to (to the east of) the main campus is a satellite campus that houses kindergarten facilities and extends east to 25th Street.

The Project Site currently contains seven permanent buildings, two modular structures, and eight modular structures totaling approximately 68,387 square feet of building area. The Project Site also contains site features including landscaping, open spaces for recreation, and a small surface parking lot.

Reflective of the eras in which they were constructed, the permanent buildings on the campus are designed in the PWA Moderne and Mid-Century Modern styles of architecture. The modular and portable structures are temporary, utilitarian improvements that lack the characteristics of a particular style.

Below is a summary table of the permanent buildings on the Project Site, followed by a description of each building. Photos of existing conditions on the Project Site are included as Appendix B of this report.



Site plan of the Project Site. Permanent buildings are noted in blue; portable and modular structures are noted in yellow (dsk architects, annotations by ARG)

Summary Table of Permanent Buildings

NAME	CURRENT USE	YEAR BUILT	STYLE	ARCHITECT
Building A	Cafetorium	1937; 1948	Vernacular	Marsh, Smith and Powell; H.L. Gogerty
Building B	Admin/Classrooms	1937; 1952	PWA Moderne	Marsh, Smith and Powell
Building C	Library	1948	Vernacular	H.L. Gogerty
Building D	Classrooms	1948	Mid-Century Modern	H.L. Gogerty
Building E	Classrooms	1948	Mid-Century Modern	H.L. Gogerty
Building F	Classrooms	1937	Vernacular	Marsh, Smith and Powell
Building G	Kindergarten	1948	Mid-Century Modern	H.L. Gogerty

Building A (Cafetorium)

- Year Built: 1937, remodeled 1948
- Architect: Marsh, Smith and Powell (original); H.L. Gogerty (remodel)

Located at the northwest corner of the campus, Building A is used as a cafetorium. It was built in 1937 and remodeled in 1948, is one story tall, and is approximately square in plan. It is a vernacular building that embodies some characteristics of the Mid-Century Modern style. The building is capped by a pitched shed roof and a flat roof, both of which are sheathed in rolled asphalt; solar panels are installed atop the roof. Exterior walls are clad in stucco. Ingress is provided by paired metal doors on the north and east façades. Fenestration is limited to the north façade and consists of fixed and hopper metal windows, which are set in a beveled frame. There are also windows on the south façade. Other features include a marquee sign that is affixed to the north wall, and painted murals that adorn the north and east façades.

Exterior alterations include the replacement of original doors and windows, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Building B (Classrooms/Administration)

- Year Built: 1937, addition built 1952
- Architect: Marsh, Smith and Powell (original volume and addition)

Building B anchors the north end of the campus and is oriented to the north toward Montana Avenue, with a strong visual presence from the street. It is used as administrative offices and classrooms. The building was originally constructed in 1927, was reconstructed in 1937, and was expanded in 1952 to include a second story. It is now two stories tall, and has a long, narrow rectangular plan. It is designed in the PWA Moderne style. The building is capped by a flat roof with rolled asphalt sheathing and a parapet; solar panels have been installed atop the roof. Exterior walls are clad in stucco. Features are symmetrical, balanced, and formal in their composition and arrangement. At the center of this façade is the primary

entrance to the school, which consists of paired, glazed metal doors with glazed sidelights and transoms. This entrance is surmounted by a shallow canopy, which in turn is surmounted by wall-mounted signage announcing the street address ("2400") and name "FRANKLIN SCHOOL") of the facility, in addition to the school seal. Signage is set within a shallow recess and uses the "Broadway-style" typeface that is commonly associated with the Art Deco and Moderne styles of architecture. Additional entrances consist of single and paired glazed metal doors. The building is fenestrated with continuous bands of fixed and hopper metal windows; the upper-story windows are framed by a continuous sill course. Windows on the ground story of the rear (south) façade are surmounted by fabric awnings.

Exterior alterations include the replacement of original doors and windows, the installation of solar panels atop the roof, and the addition of awnings to some windows. Interior features and spaces have been extensively modified.

Building C (Library)

- Year Built: 1948
- Architect: H.L. Gogerty

Building C is located at the west end of the campus. It is used as a library. The building was constructed in 1948, is one story tall, and is rectangular in plan. It is a vernacular building that embodies some characteristics of the Mid-Century Modern style. The building is capped by a flat roof with rolled asphalt sheathing and a parapet; solar panels have been installed atop the roof. Exterior walls are clad in stucco. Ingress is provided from the north, via a single metal door with a narrow vision panel. Fenestration consists of continuous bands of fixed, clerestory-style metal windows on the north and south façades. Painted murals adorn the north and south exterior walls.

Exterior alterations include the replacement of original doors and windows, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Building D (Classrooms)

- Year Built: 1948
- Architect: H.L. Gogerty

Building D is one of two buildings that are located to the rear (south) of Building B. It is used as classrooms. The building was constructed in 1948, is one story tall, and has a long, narrow rectangular plan. It is designed in the Mid-Century Modern style. The building is capped by a butterfly-style roof with rolled asphalt sheathing; solar panels have been installed atop the roof. Exterior walls are clad in stucco. There are multiple points of ingress, all of which consist of single, flush-mounted metal doors. Fenestration consists of continuous bands of fixed and hopper metal windows that span the north and south façades. The south façade opens onto a sheltered breezeway with slender metal post supports.

Exterior alterations include the replacement of original doors and windows, the modification of some original window openings, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Building E (Classrooms)

- Year Built: 1948
- Architect: H.L. Gogerty

Also located to the rear (south) of Building B, Building E is identical in plan, appearance, and composition to Building D. It is also used as classrooms. The building was constructed in 1948, is one story tall, and has a long, narrow rectangular plan. It is designed in the Mid-Century Modern style. The building is capped by a butterfly-style roof with rolled asphalt sheathing; solar panels have been installed atop the roof. Exterior walls are clad in stucco. There are multiple points of ingress, all of which consist of single, flush-mounted metal doors. Fenestration consists of continuous bands of fixed and hopper metal windows that span the north and south façades. The south façade opens onto a breezeway with metal post supports.

Exterior alterations include the replacement of original doors and windows, the modification of some original window openings, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Building F (Classrooms)

- Year Built: 1937
- Architect: Marsh, Smith and Powell

Building F spans the east perimeter of the campus and is used as classrooms. The building was constructed in 1937, is one story tall, and has a long, narrow rectangular plan that spans much of the campus's eastern perimeter. It is a vernacular building that embodies some characteristics of the PWA Moderne style. The building is capped by a flat roof with rolled asphalt sheathing and a parapet; solar panels have been installed atop the roof. Exterior walls are clad in stucco. There are multiple points of ingress, all of which consist of single, flush-mounted metal doors, most with vision panels. Some doors are surmounted by transoms, of which some have been infilled. Fenestration is mostly confined to the east façade and consists of continuous bands of fixed and hopper metal windows. There are also a few multi-light steel windows on the east façade. The west façade opens onto a breezeway with slender metal post supports. The east façade opens onto exterior patios that step up with the grade of the site.

Exterior alterations include the replacement of original doors and most original windows, the infill of some original transoms, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Building G (Kindergarten Classrooms)

- Year Built: 1948
- Architect: H.L. Gogerty

Located on the ancillary campus at the northeast corner of the Project Site, Building G is used as kindergarten classrooms. It was constructed in 1948, is one story tall, and has an L-shaped plan. It is designed in a vernacular idiom and embodies some loose characteristics of the PWA Moderne style. The

building is capped by a flat roof and a gently-pitched gabled roof, both with rolled asphalt sheathing. The flat volume is spanned by a parapet. Solar panels have been installed atop the roof. Exterior walls are clad in stucco. There are multiple points of ingress, all of which consist of single, flush-mounted metal doors with vision panels. Fenestration consists of fixed and hopper metal windows, most of which are arranged in bands. The north façade opens onto a covered breezeway with slender metal post supports.

Exterior alterations include the replacement of original doors and windows, and the installation of solar panels atop the roof. Interior features and spaces have been extensively modified.

Modular and Portable Structures

The Project Site also contains two modular and eight portable structures that were installed at various dates between 1973 and 2002. These structures are located to the rear (south) of the permanent buildings described above. Nine of these structures are used as classrooms, and one is used as a restroom. These structures are utilitarian in appearance and lack any architectural characteristics of note.

Other Site and Landscape Features

The Project Site is oriented to the north, toward Montana Avenue. From the north, the Project Site is approached by a broad front lawn that is planted with grass, mature trees of various species, and manicured perimeter shrubs. The lawn provides a buffer between the school and the public-right-of-way along Montana Avenue. A concrete walkway transects the lawn and provides pedestrian access to the school. At the far east end of the lawn is a chain link enclosure containing playground equipment. Chain link fencing is also used to restrict access to the campus at other points along its north perimeter.

As noted, there is an ancillary campus at the northeast corner of the Project Site that extends east to 25th Street. The satellite campus houses kindergarten facilities and is separated from the rest of the campus by 24th Place. It contains one of the seven aforementioned permanent buildings (Building G), a shade shelter, a paved blacktop, and a lawn with playground equipment, and is enclosed by chain link fencing.

The southern portion of the campus contains open space for recreation. To the rear (south) of the permanent buildings is an asphalt surface that is used as basketball and handball courts and also contains playground equipment and a shade shelter. Beyond that, fronting onto Idaho Avenue, is a grass lawn that is used as athletic fields and is encircled by a running track. There are a few trees planted along the perimeter of the lawn, but generally speaking the open space in the southern portion of the campus is sparsely planted apart from the aforementioned lawn. At the far southwest corner of the site is a small surface parking lot that is accessed from the south, via Idaho Avenue. The south, east, and west perimeters of the campus are enclosed by chain link fencing, controlling public access. A portion of the south perimeter is also framed by a low concrete block wall atop which the chain link fencing is installed.

4. Summary Historic Context

The following is an abbreviated history of the Franklin Elementary School campus between its founding (1924) and the present-day. The information herein was excerpted and adapted from the HRI prepared for Franklin Elementary School (ARG, 2022). For more information about the history and development of Franklin Elementary School and the District in general, refer to the HRI, which is attached to this report.

Institutional Origins

Franklin Elementary School dates to 1924, when plans to construct a new elementary school facility on Montana Avenue were approved by City building officials. A new school campus was needed to accommodate the influx of families who had settled in Santa Monica – and particularly in the neighborhoods of Northeast Santa Monica – amid the housing and development boom of the 1920s. The original iteration of Franklin Elementary School consisted of a two-story, eight-room brick-and-concrete building that was designed by architect Francis D. Rutherford and constructed by contractor J.S. Koble.¹⁹

Original architect Rutherford hailed from Salt Lake City, where his portfolio included several school facilities. He came to Santa Monica in the early 1920s amid a period extraordinary growth, and was commissioned by the Santa Monica School District to design two new schools for the swiftly growing city: Franklin School at 2400 Montana Avenue, as well as Madison School at 1018 Arizona Avenue.



Original Franklin School, 1928 (Santa Monica Public Library)

¹⁹ Ibid; “New School,” *Los Angeles Evening Post-Record*, Oct. 3, 1924.



Original Franklin School, 1928 (David Kaplan, provided courtesy of Nina Fresco)

The original, Rutherford-designed schoolhouse was consistent with the architectural trends and construction methods that prevailed when it was constructed in 1924. Historic photos show that it was a stately, symmetrical two-story building with a pitched clay tile roof and brick cladding, and had a prominent central entrance that was flanked by bands of tall, narrow multi-light windows. It occupied the same location, and had the same general footprint, of the present-day main building (Building B). To keep pace with Santa Monica’s swift growth, the building was expanded by Rutherford in the late 1920s.²⁰

1930s Reconstruction and Genesis of the Present-Day Campus

Like most public schools in Santa Monica and elsewhere in Southern California, the Franklin School sustained extensive structural damage as a result of the 1933 Long Beach Earthquake. According to an evaluation of the campus that was completed as part of the City of Santa Monica’s 1993 Historic Resources Inventory, “the school was closed, and building permits document the construction of tents for school activities late in 1933 and 1934” in the immediate aftermath of the earthquake.²¹ The District erected these tents as a temporary stopgap measure until the earthquake damage could be remediated.

In 1935, the District retained the architectural firm of Marsh, Smith and Powell to reconstruct the damaged school. Based in Los Angeles, the firm and its principals – architects Norman Foote Marsh, David Smith, and Herbert Powell – were known as adept designers of school campuses and experts in the application of the Field Act, state legislation that was enacted in the aftermath of the Long Beach Earthquake and required schools to be rehabilitated or reconstructed in accordance with new, earthquake-resistant construction methods.²² Marsh, Smith and Powell rebuilt the damaged school to be

²⁰ DPR form for the Franklin School, prepared by Leslie Heumann as part of the City of Santa Monica HRI, 1993.

²¹ Ibid.

²² Alquist, Alfred E. “The Field Act and Public School Construction: A 2007 Perspective.” California Seismic Safety Commission, February 2007. (7)

“as completely resistant to earthquakes as the state board of school architecture can devise.”²³ The reconstructed school building had the same footprint and massing as the original (1924) building, but the new building was constructed entirely of concrete (and not brick), and was also reduced to one story as a seismic strengthening measure. Marsh, Smith and Powell also eschewed the historically derived architecture that prevailed in earlier years and instead rendered the building in the PWA Moderne style, an offshoot of the Art Deco movement that was perceived as exuding modernity in the Depression era.



Artist rendering of Marsh, Smith and Powell's proposed design for the reconstructed campus, Nov. 1935 (*Evening Outlook*)

The reconstructed main building (now Building B) was completed in 1937, with substantial funding provided by the Works Progress Administration (WPA), a federal agency conceived as part of the New Deal.²⁴ Two new buildings were also constructed in 1937 to accommodate the net loss of floor area resulting from the removal of the second story of the main building. The first, located at the northwest corner of the campus, was built as a kindergarten building. (It was later renovated into a cafetorium and is now Building A). The second, located along the east perimeter of the campus, was built as an eight-unit classroom building. (This building is now Building F). Buildings A and F were also designed by architects Marsh, Smith and Powell and exhibited some characteristics of the PWA Moderne style, though both buildings were more modest and less articulated than the recently-completed main building/Building B.

²³ "Franklin School Thing of Beauty, Safety," *Evening Outlook*, Nov. 1, 1935.

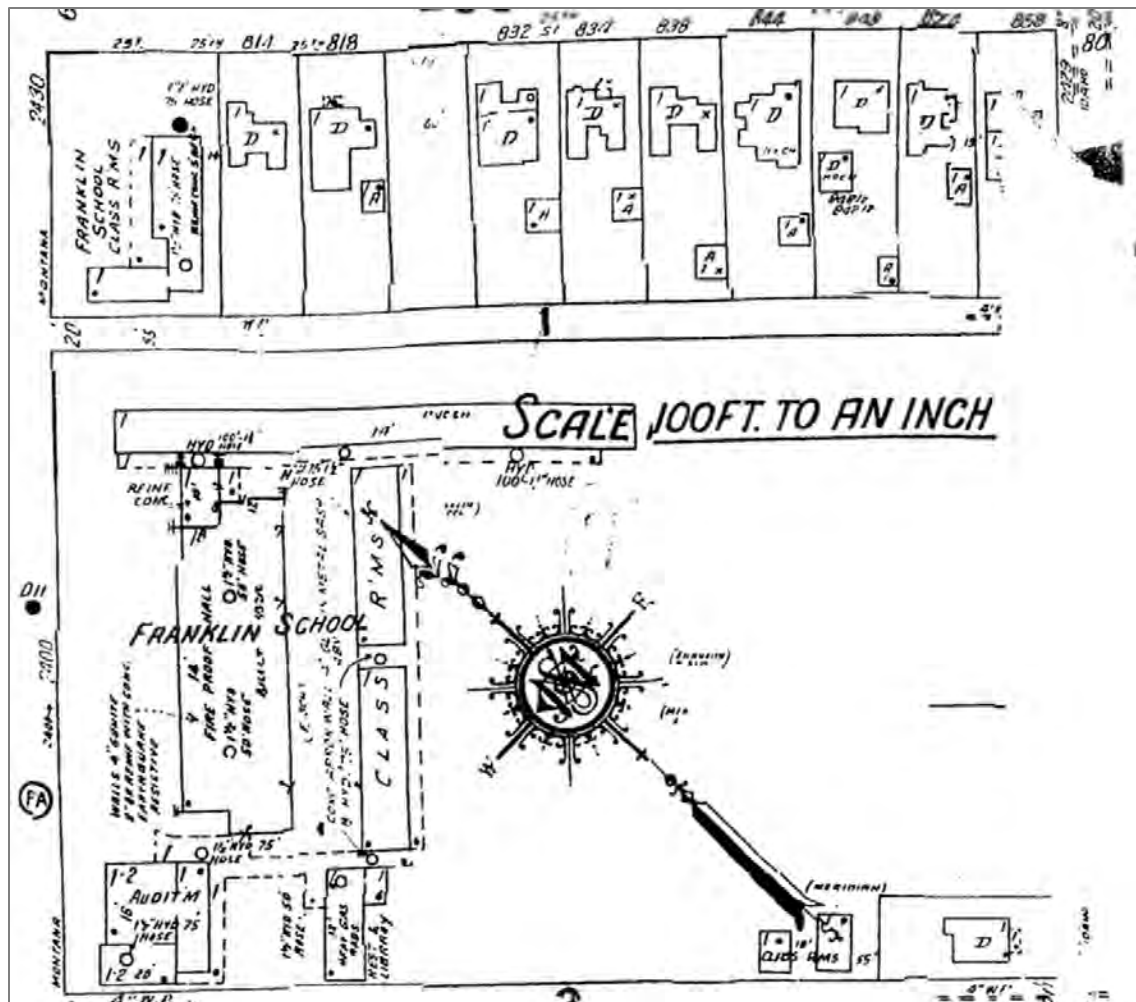
²⁴ "Cash Ready on Projects," *Los Angeles Times*, Oct. 29, 1935.



Franklin Elementary School following its reconstruction in 1937 (Living New Deal)

Post-World War II Expansion

Santa Monica witnessed extraordinary growth after World War II, paralleling broader trends that transformed the Southern California region at this time. In 1948, substantial new additions were made to the Franklin Elementary School campus at this time to increase its capacity and accommodate more students. That year, Building A was renovated from a kindergarten classroom into a cafetorium, and kindergarten facilities were moved to a satellite campus to the immediate east of the main campus that the District had recently acquired. A new kindergarten classroom building (now Building G) was constructed on the satellite campus. Also in 1948, two new classroom buildings (now Buildings D and E) were built to the rear (south) of Building B. The 1948 improvements to the campus were all designed by architect H.L. Gogerty in modest iterations of the then-popular Moderne and Mid-Century Modern styles.



Sanborn map published in 1950, after the campus was substantially expanded in 1948 (Los Angeles Public Library)

However, in spite of these additions the campus continued to experience overcrowding. In 1952, the District brought back architects Marsh, Smith and Powell to design a second-story addition to the main building that they had designed (and had reduced to one story) in 1937. The design of the second-story addition stayed true to the PWA Moderne architecture of the building and utilized similar massing, forms, and materials to the original (1937) volume of the building, resulting in a seamless transition between old and new. The second-story addition provided much-needed space for additional classrooms and offices.

Subsequent to the 1952 addition, growth at the campus has primarily been accommodated by the placement of relocatable and modular structures to the rear (south) of the campus core. District building records indicate that these temporary structures were installed in 1976, 1992, 1997, and 2002.



Franklin Elementary School, main building (Building B), ca. 2000 (David Kaplan, provided courtesy of Nina Fresco)

5. Summary of Historic Resources

5.1. Designated Historical Resources

There are currently no historical resources on the Project Site that are listed in the National Register, California Register, or on a local historic resource register.

5.2. Eligible Historical Resources

As noted, a Historic Resources Inventory (HRI) of the Franklin Elementary School campus was prepared by ARG in 2022.²⁵ The purpose of the HRI was to identify potential historical resources on the campus in accordance with Board Policy 7113 and Administrative Regulation 7113, as well as for purposes of CEQA.

Through this process, one historical resource was identified on the Franklin Elementary School campus: Building B, which was constructed in 1937 and expanded in 1952. Both the original (1937) building volume and the subsequent (1952) addition were designed by architects Marsh, Smith and Powell. The HRI concluded that Building B is individually eligible for listing in the California Register under Criteria 1 and 3, and for local (City of Santa Monica) designation under corresponding local Landmark Criteria 1, 4, and 5, as discussed below. Building B meets the definition of a “historical resource” as defined by BP 7113 and AR 7113, as well as for purposes of CEQA as defined in Section 15064.5 of the CEQA Guidelines.

Building B was found to satisfy California Register Criterion 1 and local Landmark Criterion 1 for its association with patterns of events significant to the institutional history of Santa Monica during the Great Depression and World War II periods. It was during this era of history that the City and its institutional partners (including the District) invested heavily in the expansion and modernization of public facilities. Notably, between the 1930s and 1940s nearly all of Santa Monica’s public schools were either extensively remodeled or reconstructed to accommodate growth and conform to the requirements of the state-enacted Field Act. The resulting collection of “modern” schools, in addition to other civic improvements including a new post office (1938) and city hall (1939), bestowed upon Santa Monica a sense of civic pride that was rooted in a modern institutional identity. The modernization of Santa Monica’s public schools and other civic institutions was made possible by the New Deal-era assistance programs (notably, the Works Progress Administration, or WPA) that were administered by the federal government. Completed in 1937 and financed largely by the WPA, Building B is a good example of how the progressive policies that defined this era of local institutional history were implemented.

Building B was found to satisfy California Register Criterion 3 and local Landmark Criteria 4 and 5 for reasons related to its architecture. Specifically, the building was found to embody distinctive characteristics of the PWA Moderne style as applied to an institutional setting, and therefore reads as a good example of PWA Moderne architecture and Depression-era design principles. The building was also

²⁵ The HRI Report for Franklin Elementary School is attached to this report as Appendix A.

found to satisfy the above criteria as a locally significant example of the work of master architects Marsh, Smith and Powell.

This determination of eligibility applies to both the building and its associated front landscape, which is located to the immediate north of the building.

The period of significance for the resource was identified as 1937-1952. This accounts for the window of time during which the building assumed its essential form and appearance. The start date (1937) corresponds with the construction of the building by architects Marsh, Smith and Powell; the end date (1952) corresponds with the completion of the second-story addition, also by Marsh, Smith and Powell. Since the 1952 addition was designed by the original architects and was designed to match the original (1937) building volume, the HRI included both phases of development within the period of significance.



Findings map. The location of Building B and its associated landscape are noted in purple and orange, respectively

The HRI concluded that Building B retains sufficient integrity for state (California Register) and local (Santa Monica) Landmark designation. Specifically, it was found to retain integrity of location, setting, feeling, and association; it was also found to retain integrity of design, materials, and workmanship, though these latter aspects of integrity have been compromised due to alterations. The HRI further concluded that because of alterations, Building B does not retain sufficient integrity for National Register listing, which is generally understood to have higher integrity thresholds than those applied by state and local registers.

The HRI identified the following as character-defining features of Building B:

Site and Setting

- Orientation to the north, toward Montana Avenue
- Formal, monumental massing

Building Exterior

- Two-story building height
- Simple, rectilinear building forms
- Flat roof and parapet
- Smooth stucco exterior walls
- Central entrance surmounted by a shallow hood
- Extensive fenestration comprising groups of tall, narrow window channels
- Continuous stringcourse delineating the first and second stories
- Wall-mounted sign that spells “FRANKLIN SCHOOL” in Broadway-style typeface
- Minimal decorative details and surface ornament

Front Landscape

- Broad lawn, providing an entrance sequence between the street and building
- Mature trees and shrubs
- Central concrete walkway and flagpole
- Concrete planters with buffer plantings near the base of the building

No interior character-defining features were identified through the HRI since interior spaces and features have been modified.

5.3. Ineligible Historical Resources

The HRI concluded that other improvements on the Project Site – including Buildings A, C, D, E, F, and G; the ten portable and modular structures; and other site and landscape features – are ineligible for federal, state, and/or local listing since they did not meet designation criteria. These improvements are not considered to be “historical resources” as defined by BP 7113 and AR 7113, or for purposes of CEQA.

In addition, the HRI found that the buildings and other improvements at Franklin Elementary School do not constitute a historic district. Its buildings, portable structures, and site and landscape features were constructed over an extended period, are designed in different architectural styles, and do not conform

to a legible master planning paradigm. Thus, the HRI concluded that when considered together, the collection of buildings and other improvements comprising the campus do not satisfy the definition of a historic district, which is defined by the NPS as a “significant concentration, linkage, or continuity of sites, buildings, or objects united historically or aesthetically by plan or physical development.”²⁶

5.4. Montana Avenue Multi-Family Residential Historic District

The Project Site is located within the boundaries of the Montana Avenue Multi-Family Residential Historic District, which was identified in the City of Santa Monica’s Historic Resources Inventory (2018). The potential historic district is generally located on both sides of Montana Avenue between 17th Street (west) and 23rd Street, and on the south side of Montana Avenue between 23rd Street and Stanford Street (east). The potential district consists of 67 properties including 43 district contributors and 14 district non-contributors. Franklin Elementary School is located within the identified boundaries of the potential district but was identified as a district non-contributor because its use as a school does not relate to the residential context and significance of the potential district.²⁷



Map of the potential Montana Avenue Multi-Family Residential Historic District, identified in the City of Santa Monica’s 2018 HRI Update. Note that the Project Site (outlined in red) is a non-contributor to the potential district (City of Santa Monica)

²⁶ National Register Bulletin No. 15, *How to Apply the National Register Criteria for Evaluation* (1990, rev. 1995), 5.

²⁷ City of Santa Monica, “Citywide Historic Resources Inventory Update Survey Report,” Aug. 2018, 63-65.

6. Impacts Analysis

6.1. Summary of Historical Resource Findings

In summary, one building on the Project Site – Building B – was identified as eligible for listing in the California Register and for local listing as a City of Santa Monica Landmark, and is a “historical resource” for the purposes of CEQA. The extent of the historical resource includes the building and the landscape that is located in its front (north) setback. There are no other historical resources on the Project Site.

Moreover, the Project Site falls within the boundaries of the Montana Avenue Multi-Family Residential Historic District, which was identified in the City of Santa Monica’s Historic Resources Inventory (2018). The potential district has not been formally designated. The Project Site falls within the identified boundaries of the potential district but was identified as a non-contributor to the potential district.

6.2. Significance Threshold

The CEQA Guidelines state that a project has the potential to impact a historical resource when the project causes a “substantial adverse change” to the significance of the resource. Substantial adverse change is the “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.”²⁸

The significance of a historical resource is materially impaired when a project:

- a) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, 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 or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project 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 a 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 the purposes of CEQA.²⁹

²⁸ CEQA Guidelines, Section 15064.5.

²⁹ Ibid.

6.3. Project Description

The Project proposes various improvements at Franklin Elementary School to meet the goals of the District’s Educational Specifications. Specifically, it would entail the demolition of one permanent building (Building F) and all ten portable and modular structures; construction of three new buildings; and renovation of two buildings and outdoor areas on the main campus and the adjacent satellite campus. The campus building area would be increased by approximately 24,685 square feet (from 67,581 square feet to 92,266 square feet), with increased classrooms and storage and the creation of flexible teaming spaces. The redesigned campus would support new developments in technology and new modalities of teaching, which focus less on the traditional teacher-at-the-front-of-the-classroom approach and more on rotational learning within the classroom, incorporating various project-based learning experiences that allow for individualized, small group, and large group instruction to occur simultaneously. Consistent with the Educational Specifications, the redesigned campus would feature larger classrooms, new and larger multi-purpose rooms, new shared spaces which do not currently exist, and improved outdoor spaces.

The Project would be implemented in five phases between 2023 and 2032. The District is proceeding with design and engineering of the first phase of the Project, which is funded by a 2018 general obligation bond known as Measure SMS; subsequent phases would be completed at later dates and at the District’s discretion as funding becomes available. Each phase is described below.

Phase 1

Phase 1 would involve the removal of six existing portable structures and the construction of a new one-story Maker Space building and outdoor Maker Yard, Maker Patio, and presentation platform in the place of the removed portable structures, which are located to the rear (south) of the existing collection of permanent campus buildings. The Maker-Space building would provide two Maker “studios” that would be designed to provide flexible uses for science laboratory, art studio, and other creative and collaborative project work. The Maker-Space building would be one story tall and would contain roughly 4,100 square feet, and would be L-shaped in plan and oriented at an angle. There would also be roughly 3,300 square feet of outdoor instructional space supporting the new Maker Space building, divided between a large Maker Yard, a smaller outdoor collaboration patio (the Maker Patio), and a presentation platform. The shape and orientation of the new building would allow it to offer a greater number and variety of outdoor instructional spaces than required and anticipated by the Educational Specifications.

Phase 1 would also include playfield improvements at the southeast corner of the campus. These improvements would consist of modifying and resurfacing the existing field to include a walking surface around the field, and reconfiguring the space to accommodate three full basketball courts (there are currently two full and two half basketball courts). The playfield may be resurfaced with synthetic turf that utilizes a composite, sustainable fill material such as cork, and would be designed to allow adequate drainage flow. Other improvements completed during Phase 1 would include the addition of a fire truck turn lane near the existing parking lot at the southwest corner of the site; installation of a firewater line to reach the central campus; and installation of replacement fencing near the new Maker Space area.

Phase 2

Phase 2 would involve the partial demolition of the existing Building F and removal of a portable shade structure located along the northeastern boundary of the campus, and construction of a new replacement classroom building. The new classroom building would be two stories tall and would have an L-shaped plan. It would have larger-sized classrooms including six regular classrooms, two special education classrooms, one kindergarten and one transitional-kindergarten (TK) classroom with dedicated restrooms, and custodial space. Phase 2 would involve the demolition of two classrooms and one restroom on the southern portion of Building F, and construction of the southern portion of the new two-story classroom building. The northern portion of Building F would remain in use during Phase 2.

Phase 3

Phase 3 would involve demolition of the remaining (north) portion of Building F (which houses five classrooms and two restrooms), and construction of the remaining portion of the new two-story replacement building. The footprint of the new building would be larger than the existing building; the new building would extend further south into the location of the former handball court, and the eastern extent would include the current outdoor patio area of the existing building. The eastern extent of the new two-story building would be located approximately 15 feet from the adjacent alley (24th Place).

Phase 4

Phase 4 would involve renovations to two existing school buildings. Building B would undergo interior renovations on the first floor to upgrade administrative and teacher support spaces and restrooms. At the satellite campus, Building G would also be remodeled to de-partition the TK classrooms, which would convert the existing three classrooms to two new classrooms, and would make minor upgrades to the outdoor TK facility, including refreshment of the asphalt play surface and installation of shading.

Phase 5

Phase 5 would involve demolition of the remaining modular structures, portable structures and shade structures located at the west end of the Project Site; removal of two tetherball courts and one hopscotch court, also at the west end of the Project Site; and construction of a new cafeteria and culinary arts building in the place of the demolished structures and courts. The new building would incorporate an outdoor dining area with a new kitchen garden.

6.4. Project Impacts Analysis

This section includes an analysis of the Project on historical resources, including an analysis of direct impacts to historical resources (Building B, and the Montana Avenue Multi-Family Historic District) and an analysis of indirect impacts to historical resources adjacent to the Project Site.

Direct Impacts

Building B

As discussed, the HRI for Franklin Elementary School (ARG, 2022) identified one potential historical resource on the Project Site: Building B (including the building as well as its associated front landscape), which was found to be individually eligible for listing in the California Register and for local (City of Santa Monica) designation. Building B is a historical resource for purposes of CEQA. The HRI further found that other buildings or improvements on the Project Site are ineligible for listing and are not historical resources for purposes of CEQA. Building B is therefore the sole historical resource on the Project Site.

Also as discussed, a project has the potential to impact a historical resource if the project would result in a “substantial adverse change” to the significance of a historical resource. Substantial adverse change is the demolition or material alteration in an adverse manner of those physical characteristics of a historical resource that convey its significance and justify its inclusion in, or eligibility for, the California Register.

The Project would not result in the demolition of historical resources. Demolition activity would be limited to Building F, portable and modular structures, and recreational spaces at the rear (south) of the campus, none of which are historical resources. Building B and its associated front (north) landscape would not be demolished during any phase of the Project, but would rather remain intact and in situ.

The Project would result in some alterations to Building B, a historical resource. Specifically, during Phase 4 the building’s ground floor interior spaces would be renovated to accommodate upgraded administrative and teacher support spaces and restrooms, which would entail the reconfiguration of interior spaces and the installation of new materials and finishes. However, the scope of renovation work would be limited to interior spaces, which have been extensively modified over time and are not considered to be character-defining features. The renovation would not result in any visible changes to the exterior of the building, nor would it require the removal or alteration of any character-defining features (all of which are confined to the exterior of the building). Similarly, none of the above-described phases of work would require alterations to the character-defining front lawn associated with Building B.

New construction associated with the Project would include a new Maker Space building and outdoor spaces during Phase 1, a new classroom building during Phases 2 and 3, and a new cafeteria and culinary education building during Phase 5. None of these new construction activities would result in the demolition or alteration of Building B, nor would they compromise important views or spatial relationships that characterize the historical resource. Specifically, the new Maker Space building would be physically removed from Building B. Buildings D and E would also remain intact and in their present locations, and would continue to forge a physical buffer between Building B and the southern half of the

Project Site, which is where the new Maker Space Building would be located. Similarly, the new cafeteria/culinary arts building would be located at a considerable distance from Building B, along the western perimeter of the campus. Construction of this building would not require the demolition or, or alterations to, Building B.

The new classroom building planned for Phases 2 and 3 of the Project would be two stories, which is taller than the existing building (Building F) that it would replace, which is one story. However, the new classroom building would not detract from, or compromise the significance of Building B. Because Building B is already two stories, there is precedent for two-story buildings on the Project Site, so the construction of a new two-story classroom building would not significantly deviate from the context and environs of the historical resource. Also, since the new classroom building would be located on the eastern perimeter of the Project Site, its visibility would be somewhat limited from key public vantage points, which are generally confined to the north end of the campus along Montana Avenue. The new classroom building would be visible from Montana Avenue, but because of its setback and location along the eastern perimeter of campus it would not detract from the preeminence of Building B, which currently reads (and would continue to read) as the focal point of the Franklin Elementary School campus. The new building would also be a separate structure and would not be physically attached to Building B.

Building B would retain all of its character-defining features at Project completion. These include:

- Orientation to the north, toward Montana Avenue
- Formal, monumental massing
- Two-story building height
- Simple, rectilinear building forms
- Flat roof and parapet
- Smooth stucco exterior walls
- Central entrance surmounted by a shallow hood
- Extensive fenestration comprising groups of tall, narrow window channels
- Continuous stringcourse delineating the first and second stories
- Wall-mounted sign that spells “FRANKLIN SCHOOL” in Broadway-style typeface
- Minimal decorative details and surface ornament
- Broad lawn, providing an entrance sequence between the street and building
- Mature trees and shrubs (in lawn)
- Central concrete walkway and flagpole (in lawn)
- Concrete planters with buffer plantings near the base of the building (in lawn)

For these reasons, ARG finds that the Project would not result in direct impacts to Building B, a historical resource .

Montana Avenue Multi-Family Residential Historic District

The Project would not have a direct impact on the potential Montana Avenue Multi-Family Residential Historic District, which was identified in the City of Santa Monica HRI (2018). The potential district

consists primarily of common multi-family residential property types including courtyard apartments, bungalow courts, and apartment houses. District contributors were constructed within the identified period of significance (1938-1970) and are generally designed in the Minimal Traditional, Mid-Century Modern, and Ranch styles. Most are between one and three stories tall and have rectangular, L-shaped, or U-shaped plans that are oriented toward landscaped courtyards.³⁰

The potential district was found to be eligible for local designation under Landmark Criteria 1, 3, and 4, for conveying patterns of multi-family residential development associated with Santa Monica's population growth immediately before and after World War II; and as an intact concentration of multi-family property types that were intended to respond to the context and climate of Santa Monica at the time.³¹

Although Franklin Elementary School falls within the boundaries of the potential district, it was identified as a non-contributor to the potential district because it does not relate to the contexts or themes associated with the potential district's significance. It reads as an outlier in an area composed almost entirely of residential uses, and would continue to read as such upon completion of the Project. The contextual relationship between the Project Site and the nearby neighborhood would remain unchanged.

New construction associated with the Project would be different in visual character than what is presently on site; specifically, the new classroom building would incorporate massing, proportions, materials, and finishes that clearly read as contemporary. However, because the Project Site is already programmatically and historically unrelated to the otherwise residential historic district, new construction would not interrupt the continuity of the potential district, as that continuity does not currently exist where the school is located in relation to the rest of the potential district. At two stories tall, the new classroom building would be compatible with the prevailing height and scale of the buildings comprising the potential district, which vary between one and three stories tall.

For these reasons, ARG finds that the Project would not result in direct impacts to the potential Montana Avenue Multi-Family Residential Historic District.

Indirect Impacts

The Project would not result in indirect impacts to historical resources since there are no historical resources located adjacent to the Project Site.³²

³⁰ City of Santa Monica, "Citywide Historic Resources Inventory Update Survey Report," Aug. 2018, 63-65.

³¹ Ibid,

³² For purposes of this analysis, "adjacent" refers to designated and potential historical resources that are located directly next to, or in direct view of, the Project Site. The potential Montana Avenue Multi-Family Residential Historic District is addressed above in the context of direct impacts since the Project Site is located within the boundaries of the potential district.

6.5. Summary of Continued Eligibility

Building B

Currently, Building B is individually eligible for listing in the California Register and for local (Santa Monica) Landmark designation. Specifically, the resource is eligible under CR Criterion 1/local Landmark Criterion 1 for conveying important patterns of history related to Santa Monica's civic and institutional development in the Depression era, and CR Criterion 3/local Landmark Criteria 4 and 5 as a good example of PWA Moderne architecture and as a singularly significant work of architects Marsh, Smith and Powell.

As discussed above, the Project is largely limited to buildings and other features associated with the Franklin Elementary School campus that are not historical resources; elements of the Project that involve Building B, which is a historical resource, are limited. They include renovations to some interior spaces to Building B during Phase 3, and construction of a new two-story classroom building to the immediate east of Building B during Phases 2 and 3. However, as discussed above these components of the Project would not result in the demolition or alteration of Building B such that its eligibility would be compromised. No interior features or spaces are character-defining, and the new classroom building, while highly visible, would not impede the important spatial relationship that exists between Building B and Montana Avenue.

Also as discussed above, the Project would not affect the integrity of Building B. It would continue to retain integrity of Location, Setting, Feeling, and Association, and would continue to retain integrity of Design, Materials, and Workmanship in a compromised manner. The building will continue to retain all of its character-defining features and will continue to convey its associative and architectural significance.

Building B will neither be demolished nor materially impaired, and it will continue to be individually eligible for listing in the California Register and for local Landmark designation at Project completion.

Montana Avenue Multi-Family Residential Historic District

Currently, the potential Montana Avenue Multi-Family Residential Historic District is eligible for local (Santa Monica) Landmark designation. Specifically, the potential district is eligible under local Landmark Criteria 1, 3, and 4, for conveying important patterns of history related to Santa Monica's residential development in the mid-twentieth century.

As discussed above, the Project Site is a non-contributor to the potential district because it does not meaningfully relate to the context or significance of the potential district. The Project is limited to the physical boundaries of Franklin Elementary School, which is currently a non-contributor to the potential district and would continue to be a non-contributor at Project completion. The extent of the Project is limited to the boundaries of Franklin Elementary School and would not result in the demolition or alteration of other properties within the potential district. The scale of the Project is consistent with that of other contributing properties within the potential district, many of which are between two and three stories tall, and as such it would not result in significant changes to the setting of the potential district.

The potential Montana Avenue Multi-Family Residential Historic District will continue to be eligible for local Landmark designation at Project completion.

7. Conclusion

The HRI for the Franklin Elementary School campus that was prepared in 2022 identified one historical resource: Building B, which was found to be individually eligible for listing in the California Register and as a local (City of Santa Monica) Landmark. Building B meets the definition of a “historical resource” for purposes of CEQA, and is the sole historical resource located on the Project Site.

The Project Site is also located within the boundaries of the potential Montana Avenue Multi-Family Residential Historic District. The potential district was identified in the City of Santa Monica HRI (2018) as eligible for local Landmark designation. The Project Site (Franklin Elementary School) was identified as a non-contributor to the potential district in the City’s HRI.

The Project would not result in a direct impact on historical resources. The Project would not result in the demolition or materially impairment of the significance of Building B. It will therefore not cause a substantial adverse change to the significance of the historical resource. Building B will retain all of its character-defining features and will continue to retain sufficient integrity to convey its historical significance. Building B will thus continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at Project completion.

In addition, the Project would not have a direct impact on the potential Montana Avenue Multi-Family Residential Historic District. The Project Site (Franklin Elementary School) is a non-contributor to the potential district and would continue to be such upon Project completion. The district will continue to be eligible for local designation as a City of Santa Monica Landmark at Project completion.

The Project would not have indirect impacts on historical resources as there are no historical resources located adjacent to the Project Site.

For the above-stated reasons, ARG concludes that the Project will not result in impacts to historical resources.

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