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November 21, 2019

Mr. Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803
Email: cstokes@dpw.lacounty.gov

RE: Rancho Los Amigos South Campus Project DEIR, SCH Number 2017081017

Dear Mr. Stokes:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Rancho Los Amigos South Campus Project and the proposed demolition of nearly all of the California Register-listed Rancho Los Amigos Historic District (Historic District). We submit these comments in addition to a letter being submitted by our representation, Chatten-Brown, Carstens & Minter LLP.

For over a decade the Conservancy has been working closely with various County representatives in regards to Rancho Los Amigos and its future, with numerous reuse and redevelopment proposals considered. In all cases we have pressed for meaningful retention of the Historic District and repurposing the buildings for new uses. We strongly believe there is a “win-win” scenario available to the County where both preservation and new construction is possible.

During these past ten-plus years, with the County as the steward, the Historic District has been allowed to deteriorate and buildings fall into accelerated disrepair. In recent years contributing buildings within the Historic District have been destroyed due to neglect, vandalism and numerous arson fires. For instance, the 1915 Harriman Residence was destroyed by arson in June, 2017 (Exhibit A). The current deteriorated conditions and neglect which have occurred under the County’s stewardship are now cited as a health and safety concern and justification for the proposed undertaking, including nearly wholesale demolition of the Historic District (Exhibit B).

In recent meetings with the County and included in the DEIR is a concern about ongoing security and maintenance costs with overseeing the existing facility. This has been stated as unsustainable and an ongoing concern by the County, and entered as justification for the nearly wholesale demolition of the Historic District as part of this project. While we have visited the site and witnessed the deteriorated conditions, there is no analysis provided in the DEIR that substantiates that buildings are beyond repair or reuse and therefore must be demolished. Further, no



recent analysis is provided that substantiates how such infeasibility was ascertained. The lack of condition and feasibility analysis are core deficiencies in the DEIR.

Nevertheless, the Historic District has been left unsecured, as stated in the DEIR, which has directly lead to the loss and destruction of some of the contributing historic resources, as referenced above in our comments. Just this week, on November 20, the Conservancy visited the site and found numerous, large holes in fencing allowing anyone to easily enter the site, inhabit buildings, and cause damage (Exhibit C). We are concerned about additional destruction of the Historic District while this project is being considered. The County is prohibited from neglecting these historic resources.¹ How is the County currently maintaining and securing the Historic District?

In December, 2017 the Conservancy provided comments (attached) on the Notice of Preparation (NOP) for the Rancho Los Amigos South Campus Project. Then and now we cited the significance and rarity of this historic resource, and our concern about the County's approach to demolition of nearly all of the Historic District despite the proposed project impacting only 35 (at that time, 28 acres) of the total 74 acres. We raised various questions within our NOP comments and request that these be addressed as part of our overall comments submitted through the DEIR.

In June, 2018 the Conservancy submitted additional comments (attached) to the County following a meeting and site visit of Rancho Los Amigos, including providing seven examples of other similar historic campus facilities that demonstrate how preservation and reuse is an economically viable approach. Again, we encourage the County to seriously consider a similar approach that can meet Project Objectives while also maintaining the eligibility of the Historic District.

The Conservancy's strong concerns over the proposed nearly wholesale demolition of this irreplaceable Historic District are only heightened by the County's continued direction despite our past comments. The problematic DEIR attempts to circumvent CEQA by including what should properly be evaluated as a separate project—the proposal to demolish structures outside the identified Development Area, and fails to evaluate a thorough range of potentially feasible preservation alternatives.

Rancho Los Amigos is highly significant to the heritage of all of Los Angeles County and the Conservancy and our many supporters strongly believe that a modified Alternative 4 pairing sensitive new construction with the adaptive reuse of select district contributors can retain the Historic District, feasibly meet most of the County's Project Objectives, and become a "win-win" strategy for repurposing and reactivating the long-neglected South Campus.

I. Proposed Project Poses Impacts to Cultural Resources

The Historic District was determined eligible for listing in the National Register of Historic Places by a consensus through a Section 106 process in 1995 and subsequently listed in the California Register of Historical Resources in 1998.

The Historic District was deemed significant under Criterion A of the National Register for its association with turn-of-the-century health care in Los Angeles County's indigent population, and for its later treatment of those in Los Angeles County with chronic illnesses, both mental and physical.

The Historic District contains a mix of buildings that housed both staff and patients, and a range of supporting services that collectively chart Rancho Los Amigos' transformation from a Poor Farm and

¹ Los Angeles County Code 22.14.080 - H



rehabilitative care facility into a hospital to house long-term invalid patients. Additionally, the site plan and placement of the various structures, often grouped by particular uses, reflects the operation of the facility and the relationships the individual structures and their uses had with one another.

The Historic District was re-evaluated in 2018 as part of the project's environmental review. The evaluation noted recent changes in the status of some structures while extending the Historic District's boundaries at the southeast portion of the campus.

The updated evaluation reaffirms the continued eligibility of the Historic District as a historic resource listed in the California Register of Historical Resources. The re-evaluated Historic District contains 109 features, comprised of 61 contributors and 48 non-contributors. The contributors have been further classified into the following categories: 23 primary contributors, 17 secondary contributors and 21 tertiary contributors.

As proposed, the Rancho Los Amigos South Campus Project would demolish 105 buildings and structures—an unavoidable, significant impact that would eliminate the Historic District. The project would retain just four contributors: the 1926 Administration Staff building and the 1930 Casa Consuelo patient ward, with no plans for their reuse; the 1913 water tower; and a Moreton Bay fig tree.

The County's proposed project seeks to develop facilities on the Rancho Los Amigos South Campus to accommodate the Internal Services Department (ISD) Headquarters, Probation Department Headquarters, and a County Office Building. The project would consolidate in one location approximately 3,000 County-budgeted positions that are currently at other existing County facilities.

The proposed new facilities would consist of a six-story ISD and Probation Department Headquarters, housed either in separate buildings or combined in one structure, and a five-story County Office Building, collectively totaling 650,000 square feet. Additionally, two parking structures collectively totaling 953,750 square feet would be constructed. A three-story parking structure would serve the County Office Building, while a nine-story structure would serve the ISD and Probation Department Headquarters.

The DEIR states "the full build-out of the proposed Project would encompass up to 650,000 square feet of developed floor area within the approximately 35-acre Development Area portion of the larger 74-acre Project Site."

Regarding the treatment of the rest of the South Campus beyond the 35-acre Development Area, the DEIR states "Following demolition of the buildings and structures on the remainder of the Project Site, the Site would be graded with irrigation installed, and hydroseeded with a native seed mix, and would remain open until such time future development may be proposed, if it is approved."²

II. County's inclusion of demolition-only component outside Project's Development Area circumvents CEQA, eliminates consideration of potentially feasible alternatives linked to that action

A significant flaw of the DEIR is its inclusion of a demolition-only component outside the Project's Development Area, which circumvents CEQA and eliminates consideration of potentially feasible alternatives linked to that action.

² Rancho Los Amigos South Campus Project, DEIR, ES-2



The County defines the Rancho Los Amigos South Campus project as the construction of “three new County administrative buildings within a 35-acre Development Area on the 74-acre Project Site.” Simultaneously the project is also calling for the demolition of “existing buildings, hardscape and some landscape features” throughout the larger Project Site.

The County appears to be inserting a secondary proposal, to clear the South Campus of structures outside the identified Development Area, under the guise of meeting Project Objectives focused on eliminating public safety concerns associated with the existing abandoned campus setting. Yet demolition is not the sole option for eliminating the aforementioned public safety concerns.

The direction the County is taking is sidestepping and precluding the required full consideration of preservation alternatives to its demolition-only subproject that would result in the loss of numerous structures not otherwise impacted by the proposed new construction. The Conservancy outlined this central concern of ours in our previous NOP comments and requests an explanation as to why the County is pursuing this project in this manner and how this complies with CEQA?

Under CEQA Guidelines Section 15378, “project” is defined as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...” An accurate and complete project description is essential to a legally sufficient EIR:

A curtailed or distorted project description may stultify the objectives of the [CEQA] reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative) and weigh other alternatives in the balance.³

Accordingly, a public agency cannot subdivide a single project into smaller individual subprojects in order to avoid reviewing the impacts of the project as a whole, or to eliminate potentially feasible alternatives from consideration.⁴ A separate environmental review with its own evaluation of alternatives should be prepared when future uses are identified and proposed for other portions of the South Campus and Rancho Los Amigos Historic District.

III. DEIR identifies alternatives that retain the Historic District while achieving most Project Objectives

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”⁵ To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁶ The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.⁷ Reasonable alternatives must be considered “even if they substantially impede

³ Imperial Highway Relocation Feasibility Analysis, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.

⁴ Orinda Assn. v. Board of Supervisors (1986) 182 Cal.App.3d 1145, 1171.

⁵ Public Resource Code, Sec. 21001 (b), (c).

⁶ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

⁷ Guideline § 15126.6(a).



the project or are more costly.”⁸ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁹

The DEIR identifies twelve Project Objectives which can be roughly categorized into five main areas: provide consolidated facilities for the ISD and Probation Department headquarters on the South Campus; develop County facilities that both meet current seismic performance standards and strive for sustainability; utilize existing County-owned property and enable the reuse of the South Campus to complement potential future projects in vicinity; recognize the history of Rancho Los Amigos by promoting historic preservation of buildings on the South Campus; eliminate public health and safety concerns and provide for new County facilities in a safe environment.

The Draft EIR contains two alternatives that would enable the project to retain the National Register-eligibility of the Rancho Los Amigos Historic District: Alternative 2, the Partial Preservation Alternative, Scenario 1; and Alternative 4, the Adaptive Reuse/Reduced Project Alternative, which was identified as the Environmentally Superior Alternative.

Both Alternative 2, Scenario 1 and Alternative 4 would retain all 23 primary and 17 secondary historic district contributors, while demolishing all 21 tertiary contributors and all 48 non-contributors. Alternative 2, Scenario 1 would construct new facilities along Laurel Street and Aliso Avenue for the County while mothballing all retained historic district contributors. Alternative 4 does not include new construction but would select 12 of the larger historic district contributors, primarily along Erickson Avenue, to be adaptively reused to house a portion of the County’s employees called for in the proposed project.

The Draft EIR’s limited analysis of Alternative 4 concludes it “would meet a portion of the identified Project Objectives, but to a lesser extent than the proposed Project” and does not reject the alternative as infeasible. In fact, alternative 4 appears capable of meeting nearly all of the Project Objectives fully or partially, with the exception of the objective that specifically links the project’s sustainability goals to “all new buildings.” The adaptive reuse of historic structures will of course aid in the County’s desire to pursue an environmentally sustainable project and augment efforts to achieve LEED certification. And the ability to eliminate public health and safety concerns on the campus and provide a safe environment is not contingent upon the demolition of vacant structures and can be achieved in other ways.

IV. Final EIR should evaluate a modified version of Alternative 4 that includes new construction

The opportunity exists to modify Alternative 4 by pairing new construction with the current adaptive reuse proposal, which would yield a preservation-based alternative capable of meeting, either fully or partially, all of the Project Objectives.

The Conservancy questions why a preservation alternative pairing new construction with the retention and reuse of a portion of the Historic District’s buildings was not evaluated? We specifically addressed this point in our June 27, 2018 comments following our meeting and site visit. Again, we discussed this with the County at a meeting on November 14. We strongly believe an alternative of this type holds great promise in meeting Project Objectives while retaining and reusing a meaningful portion of the existing

⁸ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁹ Public Resources Code § 21081.5.



Historic District. We strongly encourage the County to seriously consider this type of approach as a preferred project.

Such an alternative could include new construction along Erickson Avenue directly across from the District contributors proposed for adaptive reuse, or at the locations on Aliso Avenue or Laurel Street proposed for new construction in Alternative 2. Additionally, the large triangle of open space west of Laurel Street should also be assessed as a location for new construction, as it contains one of the largest segments of contiguous open space on the South Campus and lies outside the boundary of the historic district.

V. Relationship between County's environmental review and City of Downey's Specific Plan environmental review should be better coordinated

Both the County and the City of Downey are currently pursuing independent but seemingly related Environmental Impact Reports for this project site; the proposed project by the County and the "Rancho Los Amigos South Campus Specific Plan" by the City of Downey. There does not seem to be coordination between the two.

In a March 12, 2019 letter responding to the City's NOP, the City of South Gate has suggested there is CEQA project splitting and piecemeal consideration of the Downey and County projects (attached). Given that a Specific Plan may limit a range of reuse and redevelopment options for the future, why is this not being considered by the County's Rancho Los Amigos South Campus Project DEIR? Why are the City of Downey and the County not coordinating these two related undertakings?

About the Los Angeles Conservancy:

The Los Angeles Conservancy has the largest membership of any local preservation organization in the U.S., with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the DEIR for the Rancho Los Amigos South Campus Project. We look forward to continuing to work with the County to pursue a preservation alternative as the preferred project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

Attachment(s)

cc: Los Angeles County Supervisor Janice Hahn, District 4
City of Downey
Downey Conservancy
Chatten-Brown, Carstens & Minter, LLC

