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July 22, 2021

Guillermo Arreola
City of Downey
1111 Brookshire Avenue
Downey, CA 90241
Email: garreola@downeyca.org

**RE: Rancho Los Amigos South Campus Specific Plan – Draft
Program Environmental Impact Report (PEIR)**

Dear Guillermo Arreola:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Program Environmental Impact Report (PEIR) for the Rancho Los Amigos South Campus Specific Plan that supports the Los Angeles County's proposed demolition of nearly all the California Register-listed Rancho Los Amigos Historic District (Historic District). As stated in the Draft PEIR, the project does not propose any development, while future development could potentially result in direct impacts through the physical demolition, destruction, or alteration of potential historical resources within the Focus Area. Future development within the Focus Area assumes the demolition of contributor and non-contributor buildings and would remove remaining features of the Historic District's original 1888 Site plan. Thus this project will create significant and unavoidable impacts that will result in the district's loss of eligibility and delisting from the California Register of Historical Resources.

For over a decade the Conservancy has been working closely with various County representatives regarding 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 continue to believe there is a "win-win" scenario available for the Rancho Los Amigos South Campus where both preservation of the Historic District's eligibility and new construction is possible.

During these past ten-plus years, with the County as the steward, the Historic District has deteriorated and buildings continue to fall into an 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 have been cited as a health and safety concern and justification for the County's Rancho Los Amigos South Campus project's nearly



wholesale demolition of the Historic District (Exhibit B), which Downey's PEIR supports.

In meetings with the County and included in its EIR is the 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 not sufficient analysis provided in the EIR that substantiates those 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 EIR.

Nevertheless, the Historic District has been left unsecured, which has directly led to the loss and destruction of some of the contributing historic resources, as referenced above in our comments. During the County's environmental review process, 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). Since our initial site visit, Conservancy staff have returned to the property only to see that the problem persisted months later. We are concerned about additional destruction of the Historic District while this project moves slowly through the planning process. The County is prohibited from neglecting these historic resources.¹

In December 2017, the Conservancy provided comments 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 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 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. We encourage the County and City of Downey 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 and Downey's support of that project via the RLASCSP. The problematic County EIR 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 proposed Alternative 4, originally proposed by the County and adopted by Downey within its PEIR, may successfully pair sensitive new construction with the adaptive reuse of a larger selection of district contributors. Therefore retaining eligibility of the Historic District, feasibly meeting most of the City and County's Project Objectives, and become a "win-win" strategy for repurposing and reactivating the long-neglected South Campus.

¹ Los Angeles County Code 22.14.080 - H



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 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 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 County'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 by the County and supported by the City of Downey through its PEIR, the Rancho Los Amigos South Campus project would demolish 104 buildings and structures—an unavoidable, significant impact that would eliminate the Historic District. The project would retain just four historic buildings, a water tower, and Moreton Bay Fig Tree.

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 County's EIR, which the RLASCSP has incorporated into its Draft PEIR, is its inclusion of a demolition-only component outside the Project's Development Area. Thus this action circumvents CEQA and eliminates consideration of potentially feasible alternatives.

Similar to the County, the City of Downey Specifies four zones within the RLASCSP area. These include:

- 1) Flextech/Bio-Medical Sub District
- 2) Regional Public Facilities Sub District
- 3) Transit Oriented Development Sub District
- 4) Community Serving Uses Sub District

All but the Flextech/Bio-Medical Sub District encroach onto the Historic District. With the Transit Oriented Development Sub District encompassing most of the Historic District dictating a mix of retail, office, and residential units. It's unclear why a greater adaptive reuse program is not explored. Instead, the City of Downey has gone along with the County's Rancho Los Amigos South Campus projects that



dismiss the feasibility of the adaptive reuse for a different use while simultaneously 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 public safety concerns.

The County and now the City of Downey are sidestepping 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 in our previous comments to the County and requests an explanation as to why it 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.²

Accordingly, a public agency cannot subdivide a single project into smaller individual subprojects to avoid reviewing the impacts of the project as a whole, or to eliminate potentially feasible alternatives from consideration.³ 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. Modified Adaptive Reuse/Reduced Project Alternative should retain eligibility

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.”⁴ 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.”⁵ 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.⁶ Reasonable alternatives must be considered “even if they substantially impede

² Imperial Highway Relocation Feasibility Analysis, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.

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

⁴ Public Resource Code, Sec. 21001 (b), (c).

⁵ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

⁶ Guideline § 15126.6(a).



the project or are more costly.”⁷ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁸

The opportunity exists to modify the Adaptive Reuse/Reduced Project Alternative by pairing new construction and an expanded version of 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 Historic District. We strongly encourage the County to seriously consider this type of approach as a preferred project.

IV. 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 County’s certified Rancho Los Amigos South Campus Project and the “Rancho Los Amigos South Campus Specific Plan” by the City of Downey. It appears that the City of Downey has relied heavily on the County’s flawed EIR.

As with previous proposed projects by the County, and Downey’s NOP for the RLASCSP, the Conservancy remains concerned about the fate of this important historic resource. It remains unclear to us why the City of Downey has accepted the County’s flawed analysis and violation of CEQA law as part of its Draft PEIR. The unchecked refusal of Downey to explore adaptive reuse feasibility on a larger scale that retains the Historic District’s eligibility is at odds with CEQA requirements.

Thank you for the opportunity to comment on the Draft PEIR for the Rancho Los Amigos South Campus project. We look forward to continuing to work with the City of Downey 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
Senior Director of Advocacy

Enclosure

⁷ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁸ Public Resources Code § 21081.5.



Exhibit A: Before and after, arson fire of 1915 Harriman Residence, Rancho Los Amigos



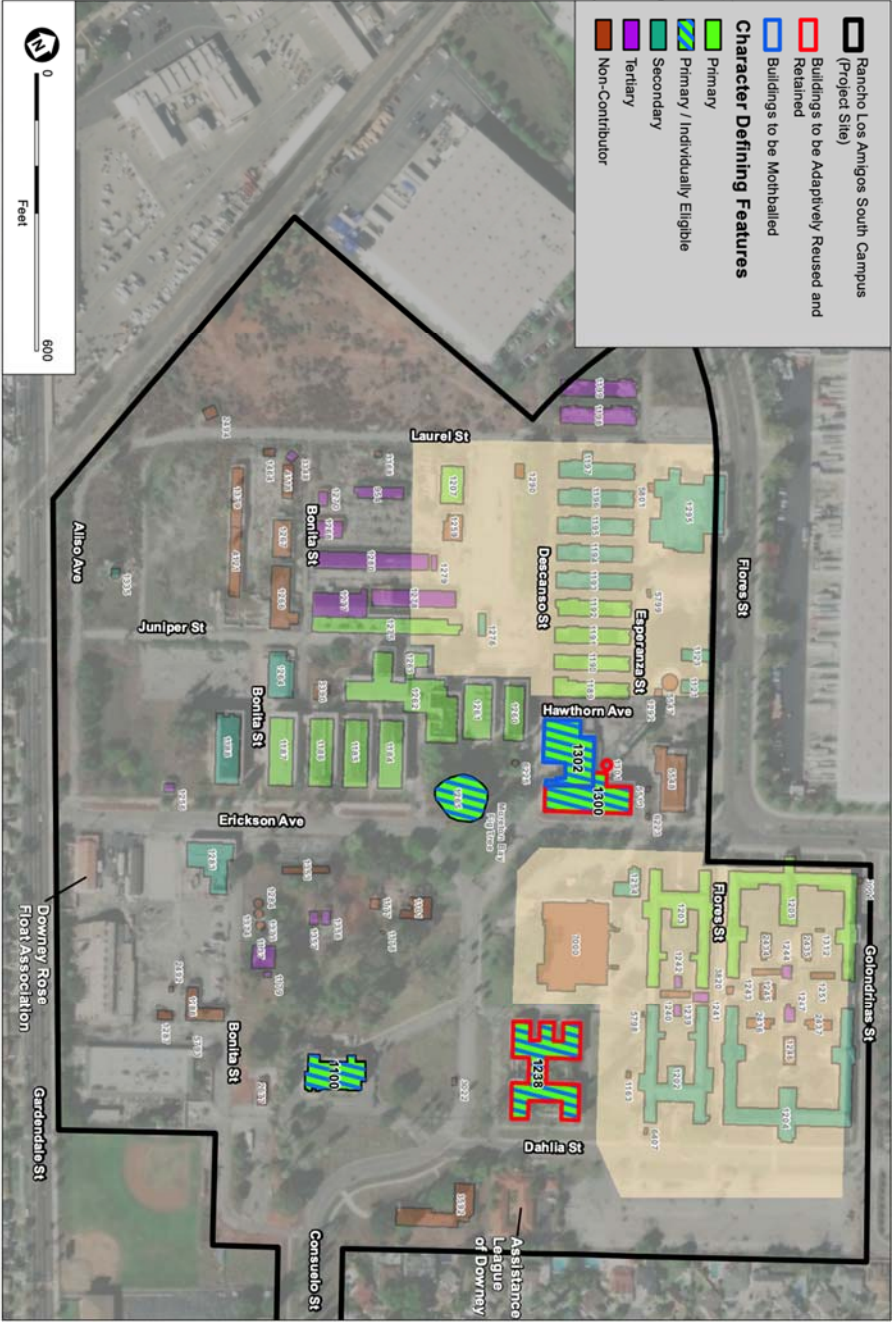
1915 Harriman Residence, as photographed in 2012 by Los Angeles Conservancy



1915 Harriman Residence, following arson fire, as photographed in 2018 by Los Angeles Conservancy



Exhibit B: Mapping of proposed demolition of Historic District



SOURCE: DigitalGlobe, 2016 (Aerial), ESA, 2019.



Rancho Los Amigos South Campus
Final Environmental Impact Report
Adaptive Reuse/Reduced Project Alternative Scenario 2
Final EIR Figure 4-5



Exhibit C: Various points of entry and lack of security. Rancho Los Amigos, as photographed by Los Angeles Conservancy on November 20, 2019



