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Sent Electronically

Jennifer Parson, Senior Environmental Planner
State of California Department of General Services
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Email: santa-fe-springs-comments@chp-ceqa.com

**RE: CHP Santa Fe Springs Area Office Replacement Project,
Draft Environmental Impact Report, SCH No. 2019030003**

Dear Ms. Parson:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the CHP Santa Fe Springs Area Office Replacement Project (Project) located on the Department of State Hospitals – Metropolitan Campus (formerly Metropolitan State Hospital, MSH). As stated in the DEIR, the Project would have significant and unavoidable impacts to the National Register of Historic Places and California Register of Historic Resources (NRHP/CRHR) eligible Metropolitan State Hospital Historic District. In addition to its eligibility as a historic district, the hospital campus has been identified as an eligible California Historic Landmark.

The hospital campus, located at 11401 Bloomfield Avenue in Norwalk, was first identified as an eligible historic district at both the National and State levels in 1980 through executive order B-64-80. In 2017, JRP Historical Consulting, LLC confirmed the 1980 determination adding eligibility as a California Historic Landmark. Their findings are detailed in the *Historical Resource Inventory and Evaluation Report Metropolitan State Hospital* prepared by the state's Department of General Services (DGS).

Significance

The campus was originally known as the Norwalk State Hospital when established in 1915, and later as the Metropolitan State Hospital (MSH) before acquiring its current title. It was the sixth state hospital to be built



and dedicated to mental illness. The original campus encompassed some 300 acres on the border of Norwalk and Santa Fe Springs. Significant as a “Cottage Plan” design, the hospital proved forward thinking and state-of-the-art for its time. Through its “Cottage Plan” design, the hospital broke away from the established congregate asylums of the day. MSH introduced human scale buildings that combined expansive lawns and pathways to offer patients a more home-like feeling.

Historically, the campus was accessed by two entrances along Bloomfield Avenue. These access points are connected by a road which rings the campus. Between the two entrances is an expansive lawn creating a bucolic vista from the street and paved road within the campus.

When established, the state intended the hospital to accommodate up to 2,000 patients as a way to alleviate other hospitals in the system. However, development at MSH was gradual at first but accelerated in the 1920s. By the end of the 1930s MSH had 47 buildings and a fully developed circulation pattern with walking paths, and a paved road. Matured foliage planted by patients dotted the campus. Like other hospitals of the period, labor was considered essential therapy, and patients were put to work on the institution’s construction.¹ By 1940 patient numbers had grown to 2,292 live-in residents.

In 2017, JRP confirmed the earlier determination that the MSH campus is eligible for listing in the NRHP/CRHR under criterion A/1 for “the important role it played in the evolution of public institutional mental health care as the first state hospital campus to be organized entirely around the Cottage Plan model.”² The district was also determined eligible under Criterion C/3 as a relatively intact example of Cottage Plan institutional design, which opened during the peak of the concept’s popularity and on which its principles were fully realized.³ The DEIR further notes that JRP determined the property eligible as a California Historical Landmark because of its status as the first fully-realized, most significant, and last surviving Cottage Plan institution in California.

JRP assigned a period of significance between 1915-1950, reflecting the 35-year period of development on the campus. Sixty-two individual elements comprise the Metropolitan State Hospital Historic District. As stated in the DEIR, JRP identified character-defining elements of the grounds as “central green spaces featuring concrete pathways lined with period-style light standards; the campus’s open and scenic views featuring expansive lawn, mature trees, and shrubs, the asphalt perimeter roads around treatment areas and driveways leading to residences.”

¹ “California Highway Patrol Santa Fe Springs Area Office Replacement Project Draft Environmental Impact Report,” Horizon Water and Environment, LLC prepared for the State of California Department of General Services, 2020, 2-3.

² “Historical Resource Inventory and Evaluation Report Metropolitan State Hospital,” JRP Historical Research (JRP) Report prepared for the California Department of General Services and Department of State Hospitals, 2017

³ “California Highway Patrol Santa Fe Springs Area Office Replacement Project Draft Environmental Impact Report,” Horizon Water and Environment, LLC prepared for the State of California Department of General Services, 2020, 3-38.



The proposed Project site is located within the largest and most prominent lawn positioned between the two original entrances.

Early twentieth-century hospital campuses, such as this one, are increasingly rare and threatened historic resources. The MSH campus shares similar histories and properties to the Los Angeles County-owned and operated Rancho Los Amigos campus in nearby Downey. Like the Metropolitan State Hospital, Rancho Los Amigos adhered to “Garden City” design concepts that was realized through patient labor. The Conservancy has worked for over ten years to save the campus as it is a critical link in the important history of California’s healthcare system.

I. Proposed Project Poses Impacts to Cultural Resources

As stated in the DEIR, the Project will have significant and unavoidable impacts to the district’s integrity and ability to convey significance. The Project plans to construct a new single-story CHP office with support structures on six acres of lawn along Bloomfield Avenue. Development of the current Project Site will permanently alter the campus’s most prominent vista. Such expanses are core to the campus’s integrity as a “Cottage Plan” hospital. Constructing the new CHP Area Office will significantly impact the district’s ability to convey significance through design, setting, and feeling.

In addition to the proposed Project, the consolidation of police operations was approved in April 2019. The new police office will be constructed eighty feet south of the Project Site along Bloomfield Avenue. To make way for construction, the state plans to demolish five contributing buildings to the eligible historic district. Despite its planned demolitions, this project was deemed to have less than significant impacts due to its location on the campus. We believe that demolition of any district contributors will have significant impacts, especially when considering the current CHP Santa Fe Springs Area Office Replacement Project

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.

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.

If the Proposed Project is approved, the total combined project area of the two projects will encompass a total of thirteen acres along the district’s Bloomfield Avenue property line. While



Horizon Water and Environment, LLC identified the impacts of the project as significant and unavoidable, the DEIR fails to adequately address the cumulative impacts of both projects on the campus.

II. Project Alternatives Do Not Mitigate Adverse Impacts to the Eligible Historic District

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

The DEIR explores four project alternatives that include the "No Project Alternative." Two of the alternatives explored Project Site alternatives. As mentioned in the DEIR, neither property owner would sell their land to the applicant. Has the acquisition of alternative sites been fully explored and demonstrated that owners refuse to sell? The record should indicate that this possibility has been fully vetted and explored. An agency cannot cure an EIR's informational defects by relying upon information or evidence that is not contained in the EIR.

Of the remaining alternatives, only the "No Project Alternative" successfully avoids significant impacts to the historic district. "Alternative 3: Reduced Hospital Site" does provide a reduced Project Site at approximately 4.25 acres thereby allowing for greater setbacks between new construction and historic buildings. However, the "Reduced Hospital Alternative" still fails to mitigate Project impacts to less-than-significant impact.

Conclusion

In conclusion, we do not believe the California State Hospital – Metropolitan campus, an eligible NRHP/CRHR historic district and California Historic Landmark, is suitable for the proposed Project. Therefore, we strongly encourage the state to continue their search for a

⁴Public 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).

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.



location that does not further compromise the integrity of this NRHP/CRHR eligible historic district and state landmark.

Thank you again for the opportunity to comment on the Draft Environmental Impact Report for the CHP Santa Fe Springs Area Office Replacement Project. The Conservancy encourages the applicant to contact us so that we may work together to achieve a project outcome that will not significantly impact this endangered historic resource.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, 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.

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

