



September 23, 2009

Submitted via email

Diana Kitching, Project Coordinator
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200 N. Spring Street, Room 750
Los Angeles, CA 90012
Email: Diana.Kitching@lacity.org

RE: Notice of Preparation—Barlow Hospital Replacement and Master Plan Project—ENV-2009-2519-EIR

Dear Ms. Kitching:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) of an environmental impact report for the Barlow Hospital Replacement and Master Plan Project. The Conservancy is the countywide historic preservation organization for the Los Angeles area and is the largest local historic preservation organization in the United States, with over 7,000 household members. The proposed replacement and master plan project would completely transform and largely demolish the historic Barlow Hospital and jeopardize the site's eligibility for listing on the National Register of Historic Places and its current listing as a City of Los Angeles Historic-Cultural Monument (HCM). As part of the city's scoping process for the Draft Environmental Impact Report (DEIR), we submit the following comments to ensure fair and thorough consideration of less harmful alternatives.

Historic Significance of Barlow Hospital

Located on 25 acres of land adjacent to Elysian Park, Barlow Sanatorium was founded in 1902 by Dr. Walter Jarvis Barlow to care for tuberculosis patients in Los Angeles County. He constructed the non-sectarian sanatorium with contributions from some of Los Angeles' most prominent families to treat those who had a reasonable chance for recovery, but were unable to work and could not afford private care. While the most ill patients recuperated in the infirmary, the sanatorium initially housed healthier patients in tent cottages with shingled roofs above board and canvas sides. Starting in the 1910s, these cottages were replaced one by one with bungalow-style permanent buildings, each donated by certain families or organizations, that still afforded patients plenty of sunshine and fresh air through sleeping and open porches.

Barlow Hospital, with its collection of 32 administrative, patient, recreational, and workshop buildings mostly in the California Bungalow and Spanish Colonial Revival styles dating from 1902 to 1952, is one of the few sanatorium campuses remaining in Los Angeles. It is

one of the most intact assemblages of contributing buildings and grounds that reflect this typology and was declared City of Los Angeles Historic-Cultural Monument #504 in 1990. The collection of buildings was determined eligible for listing in the National Register as a historic district in 1992.

Suggested Alternatives for Consideration in the EIR

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."¹ 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."² In other words, if less harmful alternatives are identified in the EIR that meet most project objectives, the lead agency should not approve the proposed project.³

To ensure fair consideration of environmentally superior alternatives, the DEIR should examine the feasibility of the proposed project in terms of current zoning limits, cumulative impacts in conjunction with nearby projects such as that announced for Dodger Stadium, and community plan objectives for the Silver Lake-Echo Park-Elysian Valley area, and for this site in particular. As the proposed project is predicated on many variables and requested approvals, the following principles should guide the development of preservation alternatives:

- Maximum retention of historic buildings.
- Identify and incorporate existing buildings most suitable for rehabilitation and reuse.
- Include a mix of flexible zoning that encourages a diversity of building types, sensitive infill construction, and a range of uses.
- Maintain mature landscaping and a sense of open space.
- Complement the existing building styles, scale, materials, and relationship with the site, landscape, and each other.
- Take into consideration existing circulation patterns on the campus and in the surrounding hillside neighborhoods.

At minimum, an alternative that maintains the National Register-eligibility of the site should be thoroughly examined, as well as a reduced density alternative that maximizes opportunities for infill construction between and around the historic buildings.

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; *also see* PRC §§ 21002, 21002.1.

³ "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." *Citizens of Goleta Valley v. Board of Supervisors* (1998) 197 Cal.App.3d 1167, 1181.

Several concerns remain about the proposed project that should also be addressed in the DEIR, such as:

- What factors informed the requested zoning change to C1, RAS4 with a residential density equivalent to R4, and RD1.5 for different areas of the site, verses other options?
- What are the plans for the buildings retained in the “historical zone” and will their rehabilitation be part of the proposed project?
- What design or other guidelines will be included in the master plan and how will it be enforced once the site is subdivided into 13 new parcels?
- Will the hospital be the sole developer of all parcels?
- Will all parcels be developed at once or phased in over time?

Barlow Respiratory Hospital is an exceedingly rare historic resource that is a treasure not only for Los Angeles but the nation. The hospital’s mandate to continue its important mission of providing respiratory care should not come at the expense of its distinguished history. We urge the hospital to make preservation an objective in the EIR and embrace this remarkable opportunity to continue Dr. Barlow’s tangible legacy into the future.

Thank you for the opportunity to comment on the Notice of Preparation for the Barlow Hospital Replacement and Master Plan Project. Please feel free to contact me at (213) 430-4211 or fchou@laconservancy.org should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Flora Chou". The signature is fluid and cursive, written in a professional style.

Flora Chou
Preservation Advocate