

June 27, 2018

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RE: Rancho Los Amigos South Campus Project

Dear Ms. Chen:

The Conservancy submits the following comments as a follow-up from our recent meeting and walk-through of the Rancho Los Amigos South Campus. We appreciated the opportunity to meet with you and the project team, have a site visit, and to learn more details about the scope of the project and the environmental review process the County is undertaking.

We also thank you for providing us with a copy of the 2018 Rancho Los Amigos South Campus Historic District Evaluation Report prepared by ESA. The intensive re-evaluation of the campus provides clarity on the historic status of the South Campus, noting recent changes with the loss of some structures while extending the District's boundaries at the southeast portion of the campus. Most important, the updated evaluation report reaffirms the continued eligibility of the Historic District as a historic resource listed in the California Register of Historical Resources.

The Conservancy continues to have strong concerns about the direction the County is taking with the project scope and environmental review—concerns that we first introduced in our comment letter on the Notice of Preparation (NOP) and raised for additional clarification at our on-site meeting and walk-through. We believe the County's current environmental review process, as contemplated, is flawed and in violation of the California Environmental Quality Act (CEQA). The County may need to take a step back to reassess the environmental review process and the current project scope in relation to forthcoming phases of anticipated development at the campus.

In our NOP comment letter, we raised questions about the County's approach in proposing demolition for all historic structures within the South Campus of Rancho Los Amigos when the proposed project is limited to a 28-acre portion. That approach is not only problematic, but is at odds with the mandate of CEQA that significant impacts to historic resources be fully evaluated with the consideration of a range of potentially feasible preservation alternatives. The County's current approach, in proposing demolition of all historic structures in anticipation of future projects within the South Campus, prevents the consideration of their potential for adaptive reuse—an approach known as project splitting that is not permitted under CEQA.



Preparation of a master plan and a programmatic EIR might be more appropriate, given the scope and phased projects anticipated by the County. The current environmental review for the Rancho Los Amigos South Campus Project should look at the entire South Campus to provide maximum consideration of project alternatives that could adaptively reuse some of the historic district contributors. The type of analysis that examines the feasibility of various sites within the South Campus to support the project goals should take place within the EIR, and the EIR process and evaluations should inform the project that is ultimately selected for certification.

While many of the historic district contributors are small, there are numerous sites currently developed with surface parking that should be evaluated for the site of proposed new construction. We would like the draft EIR to evaluate a larger project area than the currently selected 28-acre site, and assess the potential for the new construction to be treated as infill on the campus, with the potential for reuse of some of the historic district contributors for supporting services.

Consideration of win-win preservation alternatives

The Conservancy has worked with the County throughout the past ten years to identify ways to repurpose this campus and we are deeply disappointed in the County's sudden shift to pursue wholesale demolition. As in the past, we are committed to working with the County to find a win-win solution for new uses at the South Campus of Rancho Los Amigos.

We can point to numerous historic campuses throughout the nation that have been successfully repurposed through adaptive reuse and sensitive new construction, several of which have parallels to Rancho Los Amigos. As an attachment to this letter, we have highlighted just some of the many examples that exist, demonstrating how a project of this scope is not only possible but has been done elsewhere. While each campus and rehabilitation project is unique, these examples collectively serve to illustrate the range of challenges that can be addressed and the opportunities that exist in creating vibrant yet sensitive rehabilitation projects at these historic sites. Many of the campuses are in fact former hospitals.

The Conservancy strongly encourages the County to look at these examples and others as it reconsiders its approach and the strong potential for adaptive reuse at Rancho Los Amigos.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Downey Conservancy
City of Downey

Attachment: Case Study Examples



Attachment: Case Study Examples



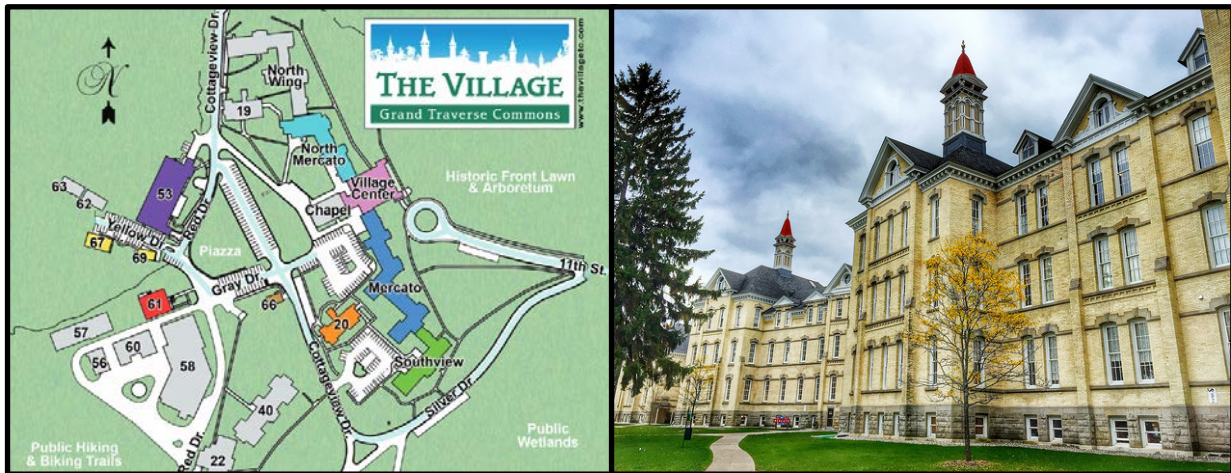
Waterbury State Office Complex, Waterbury, Vermont

- Originally built in 1890 as the Vermont State Asylum for the Insane.
- 100-acre campus with 40 buildings.
- Prior to restoration, several buildings suffered extreme flooding in 2011.
- The campus is now home to Vermont's largest agency, Agency of Human Services.
- A new 86,000 sq. ft. office building houses approximately 1,000 employees while several historic structures were preserved, adapted and reused.
- Achieved LEED Platinum certification.

"Renovation, Adaptive Reuse Anchor State Complex," Commercial Architecture, September 4, 2017:
<https://www.commercialarchitecturemagazine.com/renovation-adaptive-reuse-anchor-state-complex/>

"Waterbury State Office Complex achieves LEED Platinum," Vermont Business Magazine, February 1, 2018: <https://vermontbiz.com/news/2018/february/01/waterbury-state-office-complex-achieves-leed-platinum>





Grand Traverse Commons, Traverse City, Michigan

- Originally built in 1883-1885 as the Northern Michigan Asylum for the Insane.
- 339-acre campus with a large, centralized structure and fourteen cottages.
- State of Michigan transferred the facility to local County control in 1980s and an Adaptive Reuse Feasibility Plan was created.
- In 1990s, the north cottages were rehabilitated for assisted living.
- In 2002, a private developer acquired the central building and south cottages and renovated for housing and mixed use, including retail and dining.

The Village at Grand Traverse Commons: <https://www.thevillagetc.com/>

“Grand Traverse Commons,” Society of Architectural Historians Archipedia: <http://sah-archipedia.org/detail%2Fcontent%2Fentries%2FMI-01-GT8.xml?q=section%3AMI-01>





Liberty at Laurel Hill, Lorton, Virginia

- Originally built in the 1920s as the Lorton Reformatory, a correctional facility in northern Virginia.
- The 80-acre campus core contains gabled dormitories surrounding a grassy central courtyard.
- The federal facility closed in 2001 and was purchased by Fairfax County in 2002.
- The County pursued a master plan to guide campus redevelopment and utilized historic tax credits for the rehabilitation project.
- The repurposed reformatory is being transformed into a vibrant urban community with apartments, townhouses, single-family homes, and up to 100,000 sq. ft. of office and retail space.
- The former prison dormitories have been converted into apartments. The penitentiary is being converted into residential, commercial, retail, and office space.

Liberty: <http://thelibertylife.com/about/>

“Transforming a Historic Prison through Public/Private Partnership,” Urban Land Magazine, October 2, 2017: https://urbanland.uli.org/development-business/transforming-historic-prison-publicprivate-partnership/?utm_content=buffer25020&utm_medium=social&utm_source=twitter.com&utm_campaign=buffer





St. Elizabeths Campus, Washington, D.C.

- Opened in 1855 as the Government Hospital for the Insane in Washington, D.C.
- The original 189-acre campus was expanded to over 350 acres in 20th century.
- The 176-acre West Campus listed in National Register, with 69 contributing structures and surrounding cultural landscape.
- West Campus declared surplus property and vacated in 2001, while outpatient care continued on the East Campus.
- Most buildings had been vacant for twenty years at the start of the project and were in poor shape due to water infiltration.
- Structural work included reinforcing of original wood and iron structures as well as the design of new floor and roof assemblies to replace severely deterioration elements.
- West Campus has been adaptively reused to serve as new headquarters of the Department of Homeland Security as well as site of new headquarters for the U.S. Coast Guard.
- Achieved LEED Silver certification.

“Saint Elizabeths Hospital,” Wiss, Janney, Elstner Associates, Inc.:

<http://www.wje.com/projects/detail/saint-elizabeths-hospital>

GSA Development of St. Elizabeths Hospital: <http://www.stelizabethsdevelopment.com/index.html>





Presidio of San Francisco, San Francisco, California

- Established in 1776 as the military fortification for northern California, it remained in operation through 1994 when it was transferred to the National Park Service.
- The Presidio spans 1,491 acres. More than half of the 870 buildings are historic district contributors.
- The Presidio Trust, established in 1996, created a rehabilitation plan to oversee the reuse of the campus while maintaining its historic features and setting.
- More than two-thirds of the historic buildings have been fully or partially rehabilitated for public use.
- New uses include include a high school, a non-profit headquarters, a public museum, and a film center as well as service & leadership, sustainability, recreation & wellness, consulting & finance, retail and food service.
- LEED standards were adopted for all large rehabilitation projects beginning in 2010, and more than 20 projects have been LEED-certified or are in the process of certification.

“Fact Sheet|Presidio Building Rehabilitation,” Presidio Trust: https://www.presidio.gov/presidio-trust/press-internal/Shared%20Documents/Presidio_Building_Rehab_Fact_Sheet.pdf





The Hercules Campus, Playa del Rey, Los Angeles, California

- Original 380-acre campus built between 1941 and 1953 as the former Hughes Aircraft Company.
- Most of the campus operations closed in 1976, with some buildings demolished and others left open to the elements for decades.
- In 1991, the Hughes Industrial Historic District was listed in the California Register of Historical Resources. Of the few dozen original buildings, eleven remain today.
- In 2010, The Ratkovich Company purchased the twenty-eight acres containing the remaining historic buildings to transform the site into an office and production campus for creative media.
- Prior to rehabilitation, several building had been exposed to the elements for two decades and suffered from extreme water infiltration.
- First phase of renovation focused on stabilizing, restoring, and upgrading the core and shell of each building.
- Each tenant, once secured, put their own stamp on the interiors while maintaining original features that define them.
- Now known as The Hercules Campus, the rehab project received a preservation award from the Los Angeles Conservancy.

Hughes Industrial Historic District: <http://www.hugheshistoricdistrict.com/>

“The Hercules Campus,” Los Angeles Conservancy: <https://www.laconservancy.org/locations/hercules-campus>





Liberty Station, San Diego, CA

- The campus opened in 1923 as the 200-acre Naval Training Center, San Diego. It was later expanded to 550 acres.
- Spanish Colonial Revival architecture defines the historic campus, along with a historic site plan and landscaping elements.
- In 1997, all military operations at the campus ceased and the City of San Diego gained ownership of the property in 2000.
- The campus was listed in the National Register of Historic Places in 2001.
- The nonprofit NTC Foundation oversees the development of the historic and nonprofit area, which includes the rehabilitation of over 15 historic structures.
- The site has been transformed into a mixed-use development that includes several distinct districts: a retail and commercial district, a promenade focused on nonprofit activities, an educational district, a residential district, a hotel district, an office district, and a park/open space area along the boat channel.
- The office and residential districts contain new construction featuring designs influenced by the campus's original Spanish Colonial Revival architecture.

Liberty Station: <https://libtystation.com/>

