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October 15, 2020

**Sent Electronically**

Mr. Rueben C. Smith, D.C.Sc., Chief Facilities Executive  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6<sup>th</sup> Floor  
Los Angeles, CA 90017  
Email: [smithrc@email.laccd.edu](mailto:smithrc@email.laccd.edu)

**RE: Notice of Preparation for the South Gate Education Master Plan Update Supplemental Draft Environmental Impact Report**

Dear Mr. Smith:

On behalf of the Los Angeles Conservancy, I am writing to comment on the South Gate Education Center (SGEC) Facilities Masterplan Update Notice of Preparation (NOP). The Los Angeles Conservancy is concerned by the Los Angeles Community College District's (LACCD) decision to propose demolition of the last remaining resource associated with the California Register of Historical Resources eligible South Gate Historic District. The current NOP represents the third environmental impact report (EIR) at this location since 2013. At this point, the cumulative effect of this environmental review process has systematically demolished the entire South Gate Historic District with the exception of Building 2. We are concerned that this piecemeal approach has not allowed for a fully transparent process and assessment of the proposed project as a whole, and adherence

The Conservancy strongly believes that Building 2, the last remaining building connected to the Firestone Tire and Rubber Plant must be saved and adaptive reuse alternatives fully explored.

**I. The California Register of Historical Resources eligible Firestone**

From 1928-1980, the Firestone Tire and Rubber Plant operated at the current SGEC campus location. During this period, Los Angeles grew into the second largest rubber manufacturing center in the country after Akron,



Ohio. Shortly after operation began at the Firestone plant, Los Angeles became a center for both automobile and aircraft industries which put in place the infrastructure for these industries during World War II.

In 2009, SWCA found the South Gate Historic District eligible for listing the California Register. The historic district was deemed eligible under Criterion 1 for its association with events that made a significant contribution to the broad patterns of California's history and cultural Heritage. Criterion 2 for its direct associations with the Harvey S. Firestone Family, development of the tire and rubber industries in California, the automobile revolution, its subsequent culture, and the early 20<sup>th</sup> century industrial boom of Los Angeles. Lastly, the plant was found eligible under Criterion 3, as it embodies the distinctive characteristics of a type (industrial and manufacturing), period (1928-1954) and region (southern California).

The South Gate Historic District was made up of four individual historic resources. Buildings 1, 2, and 3 were found individually eligible for listing. Building 4, the remaining historic resource, was identified as a district contributor.

Building 2 remains as the last structure connected to the South Gate Historic District. With its location at the corner of Firestone Boulevard and Santa Fe Avenue, Building 2 is a prominent reminder of the important legacy of the Firestone Tire and Rubber Plant.

## **II. LACCD has systematically demolished the South Gate Historic District through piecemeal environmental review projects.**

In 2014, LACCD certified its Firestone Education Center Master Plan. In this iteration of the Master Plan, LACCD proposed the demolition of Building 4, a 220,550 square-foot industrial facility to make way for a new parking structure with 1,600 spaces as well as outdoor amenities. In this plan, Buildings 1, 2, and 3 were to remain and LACCD would continue to lease the facilities to tenants for warehousing and other uses.

In 2016, LACCD certified its second Master Plan, known as the 2015 South Gate Educational Center Master Plan. In this iteration, LACCD expanded its proposed demolition to include Buildings 1 and 3, as well as the bridge connecting Building 1 with building 2. In their place, LACCD proposed to construct a 100,000 square foot building, new surface parking lots, improved landscaping, an open space area, and other outdoor amenities to accommodate existing and projected student enrollment. In this Master Plan, Building 2 would remain with no plans for SGEC to occupy the building.

At present, the only extant building connected to the South Gate Historic District resource is Building 2, which remains unoccupied which is now threatened with demolition. As stated in the NOP, the needless demolition of this significant historic resource is to create greenspace. When examining the SGEC project background, it is clear that LACCD either failed to adequately plan greenspace, or they have split the projects with the intent to demolish an entire historic district. Despite the LACCD's planning, it does not appear too late for the district to implement a new greenspace plan that does not necessitate the demolition of Building 2. As of October 2020, the SGEC campus is leveled with no new construction in place.



### III. Alternatives to the proposed demolition of Building 2 must be considered.

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.”<sup>1</sup> 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.”<sup>2</sup> 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.<sup>3</sup> Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”<sup>4</sup> Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.<sup>5</sup>

With Building 2 the last remaining historic resource connected to the South Gate Historic District, the Conservancy strongly urges the LACCD to suspend its current Supplemental Draft EIR process and explore adaptive reuse alternatives for the subject building. Whether or not the LACCD had a specific use for the building, there are opportunities for partnerships with other entities to reuse and rehabilitate this structure. As depicted in the 2015 South Gate Educational Center Plan, roughly ¾ of the Project Area appears to be occupied by either surface parking or parking structures. Given this plan, and the current state of the campus, LACCD has the opportunity to reimagine both its parking configuration and greenspace amenities to meet future demands at the campus. CEQA requires the full consideration of alternatives as part of this environmental review process.

### IV. Conclusion

The Conservancy strongly opposes the proposed demolition of Building 2 on the SGEC campus. Building 2 is the last remaining resource connected to the South Gate Historic District. First identified by WCA in 2009, the historic district was re-evaluated in 2015 with the same conclusion. While the district as evaluated in 2015 no longer stands, Building 2 remains an individually eligible historic resource.

The Conservancy urges the LACCD suspend its current environmental review process and explore adaptive reuse alternatives. The proposed demolition of Building 2 is unnecessary and reveals a short-sited solution to LACCD’s failure to adequately plan for their future student’s needs.

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<sup>1</sup>Public Resource Code, Sec. 21001 (b), (c).

<sup>2</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

<sup>3</sup> Guideline § 15126.6(a).

<sup>4</sup> *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

<sup>5</sup> Public Resources Code § 21081.5.



The Conservancy welcomes an opportunity to work with the LACCD to determine how potential preservation alternatives and a “win-win” outcome can be achieved. We would appreciate setting up a time to meet to better understand LACCD’s needs and basis for calling for the demolition of Building 2, a highly significant 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](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

