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Submitted via email

Ms. Krystin Hence
County of Los Angeles
Department of Economic Opportunity
510 S. Vermont Avenue, 11th floor
Los Angeles, CA 90020
Email: generalhospital@opportunity.lacounty.gov

June 29, 2026

RE: Comments on the Draft Subsequent Environmental Impact Report (SEIR) for the Los Angeles County General Hospital Campus Master Plan (SCH No. 2014051061)

Dear Ms. Hence,

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the Los Angeles County General Hospital Campus Master Plan. The Conservancy supports the Master Plan’s vision of expanding the campus beyond episodic care into a place that supports daily lives, opportunity, and belonging. We believe the Master Plan can balance a mix of uses that reflect community priorities and County objectives. We enthusiastically support the adaptive reuse of the National Register Los Angeles County General Hospital – Acute Unit and the creation of needed community resources, as this will be truly transformative and bring much-needed housing to Los Angeles. We however do have some questions regarding the current scope of impacts on historic and cultural resources.

To satisfy the requirements of the California Environmental Quality Act (CEQA), the Draft SEIR must account for changes in the project, changed circumstances, and new information that impacts the integrity of the historic campus. To ensure compliance with CEQA Guidelines Section 15162 and 15164, we request that the following four major comments regarding the Draft SEIR’s cultural resources analysis be addressed.

- I. New mitigation measure is needed to address significant environmental impacts of the updated 2026 Master Plan on the Viaduct (604).**



The 2026 Master Plan treatment of the Pharmacy Building (502) and Viaduct (604) and recommended Project Design Features (PDFs) 4 and 5 rely on an analysis that the Pharmacy Building and Viaduct are not historic resources pursuant to CEQA because they were contributors to a largely demolished eligible Support Services historic district and do not appear to be individually eligible historic resources. The Draft SEIR fails to fully analyze the structural and aesthetic impacts of adjacent grading, demolition, or new construction on these historic resources because they were analyzed and treated as non-historic resources pursuant to CEQA in the 2026 Los Angeles County General Hospital Campus Master Plan.

According to the 2014 Los Angeles County General Hospital Campus Master Plan, the Pharmacy Building had been determined individually eligible for the National Register of Historic Places in 1976 and given a 3S status code. The Viaduct was also determined eligible for the National Register in 1976, with a 3D status code, for its associations with the General Hospital - Acute Unit. Having both been determined eligible for the National Register, they were listed on the California Register of Historical Resources. These eligibility determinations were reconfirmed in 1999.¹

Despite the loss of integrity to the Support Services historic district, the Conservancy believes both resources should be treated as historic resources; the Pharmacy building is an early, rare and intact example of an institutional resource associated with the theme of “Public and Private Health & Medicine”² in the Adelante Eastside Redevelopment Agency Area, and the Viaduct is a character-defining feature of the General Hospital – Acute Unit.³

By way of background, mitigation measures approved for the Pharmacy Building and Viaduct in 2014 were:

- MM-CR-3: A protection plan for the viaduct/tunnel shall be prepared prior to the construction of any master plan project that would occur in the immediate vicinity of the viaduct/tunnel. This protection plan shall be prepared by a qualified historic preservation specialist who shall document the current condition of this structure before any construction begins and monitor the structure during construction.
- MM-CR-4: A historic structures report shall be prepared that identifies the character-defining features of the old Administration Building and the Pharmacy/Service Building, which will provide the basis for preparation of a protection and preservation plan for these buildings. The preservation and protection plan shall be prepared by a qualified historic preservation consultant who will document the current condition of the buildings and monitor the condition of the buildings during any construction activities.

¹ LAC+USC Medical Center Campus Master Plan Project Final Environmental Impact Report 2014, page 3.4-16.

² Intensive Historic Resources Survey Adelante-Eastside Development Area, 85.

³ LAC+USC Medical Center Campus Master Plan Project Final Environmental Impact Report 2014, page 3.4-11.



The 2026 Master Plan requires PDFs 4 and 5, which call for HABS/HAER Level II documentation for the Pharmacy Building and Viaduct and an Interpretation plan for the Viaduct.⁴

Considering the need to balance County priorities and community needs, we understand the rationale in updating mitigation measures related to the Pharmacy Building and Viaduct provided in the 2014 Master Plan FEIR. In lieu of carrying over the approved 2014 mitigation measures for these resources, we support PDFs 4 and 5, and appreciate that the County has prepared concept plans for interpreting the Viaduct as part of the 2026 Master Plan SEIR. While none of these options include full preservation, the Conservancy supports formalizing Option 1: Partial Preservation + New Program as an additional required mitigation measure associated with the Viaduct. Further, we support preserving as much of the Viaduct structure as feasible to incorporate into the County’s interpretative plan. Doing so will lessen the impact to a rare historic resource and offers a unique opportunity to interpret history and operations of Los Angeles County General Hospital, while creating a unique public amenity to be enjoyed by future residents and guests.

Action: Add PDF 6 Partial Preservation + New Program. A qualified historic preservation specialist will be hired to develop the preservation plan and will document the current condition of the structure before any construction begins and monitor the structure during construction.

II. Visual and Spatial Encroachment on contributing features including Los Angeles County General Hospital - Acute Unit (101), Patient’s Building (102), Visitor’s Building (103), and Entrance Forecourt.

The proposed placement, massing, and height of up to four stories of proposed new development surrounding the Patient’s Building (102) and Visitor’s Building (103) encroaches upon contributing features of the National Register Los Angeles County General Hospital–Acute Unit historic district. The Conservancy believes the historic setting and viewsheds of the Los Angeles County General Hospital – Acute Unit (101) must be protected.

Encroachment that significantly alters spatial relationships or obstructs historic viewsheds associated with the Acute Unit and contributing resources may not be consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. To help ensure compatibility, the Draft SEIR should incorporate clear design guidelines, including appropriate height limits and setback requirements for any new construction surrounding contributing structures. New development should be carefully designed to remain subordinate in scale, height, and massing, thereby supporting the continued integrity of the historic district. Existing grade differences can be creatively leveraged to minimize visual impact while still achieving project goals.

Action: Pursue alternatives and include diagrams and views that show proposed maximum development at the Patient’s Building and Visitor’s Building from all

⁴ See PDFs 4 and 5 in *Los Angeles County General Hospital Campus Master Plan Draft Subsequent EIR 2026*, page 2-26.



directional views to understand and minimize the impacts on contributors, the Acute Unit, and associated historic district.

III. Insufficient analysis of impacts to Historic Marengo Street and Zonal Avenue Gateways (137) and Control House (136).

The Draft SEIR lacks clarity regarding the physical and operational fate of the historic gateways identified as structures 136 and 137. These entryways serve as literal and symbolic thresholds to the historic campus. The Final SEIR must explicitly clarify whether the proposed development, utility routing, or circulation adjustments will alter, damage, or relocate these gateways. The plan currently states that the historic central gateway may be relocated further along Zonal Avenue.⁵ We request the County study the impacts relocation will have on the integrity of the contributor and historic district. Additionally, we request alternative preservation strategies to retain the historic central gateway in place to avoid jeopardizing the integrity and status of the National Register historic district.

Actions: Clarify and provide 1) How the relocation impacts the historic resource and historic district's integrity; and 2) Pursue alternatives to relocating the contributing resource. The County will also provide diagrams and views from all directional views showing how proposed development will impact these historic resources.

IV. Failure to Identify Hazard Park as a Historic Resource in the Vicinity of the Project Site.

The Draft SEIR does not appear to identify adjacent Hazard Park, located at 2230 Norfolk Street as a significant historic resource within close geographic proximity to the project site. Established in 1892, Hazard Park has been recognized in the *Adelante Eastside Redevelopment Area Historic Resources Survey* and assigned a 5S3 status code.⁶

In addition to its importance as a late 19th/early 20th century landscape design, Hazard Park holds cultural and historical significance under SurveyLA themes of Education 1930-1980 and Civil Rights Movement 1920-1980. Notable, the park is associated with the 1968 Chicano Student Walkouts, during which high school students from five LAUSD schools (including nearby Roosevelt High School in Boyle Heights and Lincoln High School in Lincoln Heights) walked out of their schools to demand educational reform. Hazard Park became a vital staging ground and community sanctuary during the height of these protests.⁷

⁵ *Los Angeles County General Hospital Campus Master Plan Draft Subsequent EIR 2026*, page 2-22.

⁶ See Historic Places LA, <https://historicplacesla.lacity.org/report/ffccf8b1-3ab6-4893-a4c9-3d761f8a4c62>.

⁷ Antonio Mejias-Rentas, "Hazard Park among Latino Heritage sites proposed for federal protection," *Boyle Heights Beat*, July 8, 2021, <https://thelocal.org/neighborhoods/boyle-heights/hazard-park-among-latino-heritage-sites-proposed-for-federal-protection/>; See also Louis Sahagun, "Thousands honor '68 walkouts by Mexican American Students," *Los Angeles Times*, March 9, 2008, <https://www.latimes.com/archives/la-xpm-2008-mar-09-me-chicano9-story.html>.



Action: The Final EIR shall formally recognize Hazard Park as a historic resource and study indirect and cumulative impacts to the resource pursuant to CEQA.

In conclusion, the Conservancy strongly supports the adaptive reuse of Los Angeles County General Hospital for housing, as it will activate this historic place and truly transform this area of Los Angeles. Through our comments, the Conservancy has identified concerns regarding the Draft SEIR's treatment of historic resources and the evaluation of potential project impacts, which suggest areas where the analysis could be further strengthened. We urge the County to address these considerations and gaps in the Final SEIR to help ensure the Los Angeles County General Hospital Campus Master Plan appropriately recognizes its historic significance while thoughtfully planning for the future.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households 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.

Sincerely,



Andrew Salimian
Director of Advocacy

