

Appendix M

Comments on the Draft EIR





Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

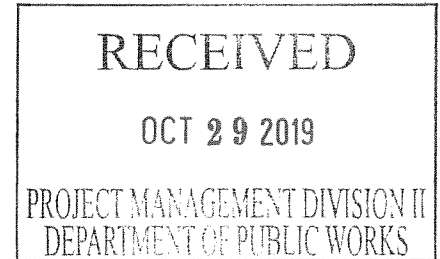
Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

October 16, 2019

Mr. Cliff Stokes
Project Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave, 5th Floor
Alhambra, California 91803



NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT

Dear Mr. Stokes:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

A1-1

Based on the review of the document, the DTSC comments are as follows:

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

A1-2

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

A1-3

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

A1-4

Mr. Cliff Stokes
October 16, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Standard Voluntary Agreement (SVA). For additional information on the SVA, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6545 or e-mail at Fatima.carrera@dtsc.ca.gov.

A1-5

Sincerely,



Fatima Carrera
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Letter A2

Cliff Stokes (Consultant)

From: Higgins, Anthony@DOT <Anthony.Higgins@dot.ca.gov>
Sent: Thursday, November 21, 2019 9:59 AM
To: Cliff Stokes (Consultant)
Cc: state.clearinghouse@opr.ca.gov
Subject: SCH# 2017081017 - Caltrans District 7 Comment Letter - Ranchos Los Amigos South Campus Project - DEIR - GTS# 07-LA-2017-02924
Attachments: 07-LA-2017-02924 Rancho Los Amigos South Campus Specific Plan - DEIR - SIGNED.pdf

CAUTION: External Email. Proceed Responsibly.
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Good Morning,

Attached, please find Caltrans' comment letter for the above referenced project (SCH# 2017081017). A hard copy of the letter will be mailed out later today.

Best,

Anthony Higgins
Transportation Planner
Caltrans District 7, Division of Planning
(213) 897-0067
anthony.higgins@dot.ca.gov

DEPARTMENT OF TRANSPORTATION

DISTRICT 7- OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, SUITE 100

LOS ANGELES, CA 90012

PHONE (213) 897-0067

FAX (213) 897-1337

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www.dot.ca.gov

*Making Conservation
a California Way of Life.*

November 21, 2019

Cliff Stokes

County of Los Angeles Department of Public Works

900 South Fremont Ave., 5th Floor

Alhambra, CA 91803

RE: Rancho Los Amigos South Campus Project
– Draft Environmental Impact Report (DEIR)
SCH# 2017081017
GTS# 07-LA-2017-02924
Vic. LA-105 / PM R14.565

Dear Cliff Stokes:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The County proposes to develop three new County administrative buildings in the Development Area on the Project Site, including the Internal Services Department (ISD) Headquarters, Probation Department Headquarters, and a County Office Building. Staffing for each of these buildings would be filled by approximately 3,000 County-budgeted positions that are currently at other existing County facilities located within the region. The ISD and Probation Headquarters buildings, both of which would be up to six stories (90 feet) each, may be co-located in one building, which would also be up to six stories (90 feet). The County Office Building would be up to five stories (75 feet). The total square footage for the proposed Project would be up to approximately 650,000 square feet. The proposed Project would include development of two parking structures for employees and visitors. The ISD/Probation Parking Structure would provide 2,167 parking spaces, with a height of up to nine stories (90 feet). The County Office Parking Structure would provide 525 parking spaces, with a height of up to three stories (36 feet). The proposed Project would include all necessary utilities and points of connection, roadways, curbs and gutters, sidewalks, medians, site structures, hydrants, vaults, manholes, substations, street lights, street signage, landscaping, and irrigation for the proposed new development. Off-site-improvements, such as those required for utilities, would also be necessary. All staging during construction would occur on the Project Site.

The nearest State facility to the proposed project is Interstate 710 and Interstate 105. After reviewing the DEIR, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that ultimately help California to meet its climate, transportation, and livability goals. However, due to the amount of parking and lack of mixed land uses, the Rancho Los Amigos South Campus Project is designed in a way that potentially induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Reducing the amount of parking whenever possible, as research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an excessive amount of parking. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

A2-3

- If the parking structures must be built, they should be designed in a way that is conducive to adaptive reuse. Parking structures with flat floors and ramps on the exterior edge can be more easily converted to more beneficial uses in the future.

A2-4

- This project is immediately adjacent to a planned light rail station along the West Santa Ana Branch Transit Corridor. This DEIR has done little to discuss the significantly different transportation context that will exist in the future. It should contain elements that improve walkability and encourage future light rail users.

A2-5

- As stated in the DEIR, there will be improvements to nearly all interior roadways. This presents an opportunity to create a streetscape that is safe and comfortable for all users. Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

A2-6

Caltrans concurs with Mitigation Measure TRA-1 regarding detours during construction, which states: "Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate." Additionally, Caltrans recommends that bicycle and pedestrian detours during construction meet or exceed standards required in the California Manual on Uniform Traffic Control Devices (MUTCD). Maintaining viable detour routes during construction, that include adequate barriers against motorized traffic, is critical to the safety and comfort of pedestrians and bicyclists.

A2-7

Regarding the Traffic Impact Study (TIS):

- Caltrans is responsible for obtaining measures that will off-set significant impacts to State facilities. Therefore, the Congestion Management Program (CMP) guidance of 150 or more vehicle trips added before freeway analysis is needed, does not apply. MTA's CMP, in acknowledging Caltrans' role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System. A2-8
- 95 additional trips (see Figure 7-3) generated by the project will be added to the WB Route 105 mainline, and no freeway segment analysis was conducted. It is recommended that the freeway analysis be conducted. A2-9
- No threshold of significance for determination of impact on Caltrans on- and off-ramp terminal intersections was provided. It is recommended that the threshold of significance be provided. A2-10
- The northbound (NB) and southbound (SB) on- and off-ramps to and from Imperial Highway were not included in the TIS. It is recommended that these locations be included. A2-11
- Intersection #11, Garfield/105 EB off-ramp, is currently operating at a cycle length of 70 seconds. HCM Data Sheets contained in Appendix F show a cycle length of 90 seconds. Consequently, the analysis result at this location was not calibrated with the actual signal timing plan. It is recommended that the intersection be re-evaluated with the correct cycle length. A2-12

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. A2-13

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2017-02924. A2-14

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Gavin Newsom
Governor

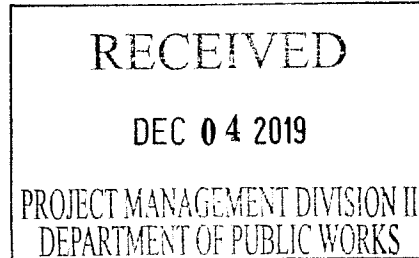
STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

November 22, 2019

Cliff Stokes
Los Angeles County
900 South Fremont, 5th Floor, Alhambra, CA
Alhambra, CA 91803



Subject: Rancho Los Amigos South Campus Project
SCH#: 2017081017

Dear Cliff Stokes:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 11/21/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2017081017/2>. Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

A3-1



COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 5, 2019

Cliff Stokes, Project Manager
Department of Public Works
Planning Department
900 South Fremont Avenue
Alhambra, CA 91803

Dear Mr. Stokes:

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT, "RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT," PROPOSES TO DEVELOP THREE NEW COUNTY ADMINISTRATIVE BUILDINGS IN THE DEVELOPMENT AREA ON THE PROJECT SITE, INCLUDING THE INTERNAL SERVICES DEPARTMENT HEADQUARTERS, PROBATION DEPARTMENT HEADQUARTERS, AND A COUNTY OFFICE BUILDING, DOWNEY, FFER 2019006033

B1-1

Notice of Availability of the Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Downey, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

B1-2

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	EL MONTE	INDUSTRY	LAWNDALE	PARAMOUNT	SIGNAL HILL
ARTESIA	CARSON	GARDENA	INGLEWOOD	LOMITA	PICO RIVERA	SOUTH EL MONTE
AZUSA	CERRITOS	GLEN DORA	IRWINDALE	LYNWOOD	POMONA	SOUTH GATE
BALDWIN PARK	CLAREMONT	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	MALIBU	RANCHO PALOS VERDES	TEMPLE CITY
BELL	COMMERCE	HAWTHORNE	LA HABRA	MAYWOOD	ROLLING HILLS	WALNUT
BELL GARDENS	COVINA	HERMOSA BEACH	LA MIRADA	NORWALK	ROLLING HILLS ESTATES	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HIDDEN HILLS	LA PUENTE	PALMDALE	ROSEMEAD	WESTLAKE VILLAGE
BRADBURY	DIAMOND BAR	HUNTINGTON PARK	LAKEWOOD	PALOS VERDES ESTATES	SAN DIMAS	WHITTIER
	DUARTE		LANCASTER		SANTA CLARITA	

LAND DEVELOPMENT UNIT:

ACCESS:

1. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.
2. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.
3. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.
4. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Fire Code 503.2.5.
5. Provide a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. Fire Code 503.1.1 and 503.2.2.
6. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.
7. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1.
8. A required 32' centerline turning radius is required at all turns within Fire Department vehicular access. Provide the dimensions and show them at each turn within Fire Department vehicular access or provide a detail for all proposed turns shown on the site plan.
9. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

B1-3



10. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch. Fire Code 505.1.
11. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.
12. When security gates are provided, maintain a minimum access width of 20 feet. The security gate shall be provided with an approved means of emergency operation, and shall be maintained operational at all times and replaced or repaired when defective. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F220. Gates shall be of the swinging or sliding type. Construction of gates shall be of materials that allow manual operation by one person. Fire Code 503.6.

WATER:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Department C105.1 CFC.
2. All required PUBLIC fire hydrants shall be installed, tested and accepted prior to beginning construction. Fire Code 501.4.
3. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.
4. Show all existing public fire hydrants to within 300' of all property lines. Provide the dimensions and show the distance on the site plan.
5. The required fire flow for the public fire hydrants for this project is 8,000 gpm at 20 pounds psi residual pressure for 4 hours. Three public fire hydrant(s) flowing simultaneously may be used to achieve the required fire flow. Fire Code 507.3 and Appendix B105.1.

Additional comments pending the information returned by the applicant for Fire Department plan check; presently all outstanding comments have been addressed via plan check.

B1-3
cont.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

↑ B1-3
cont.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

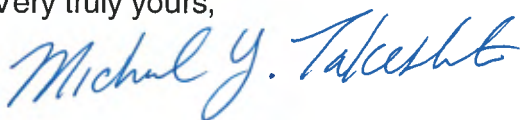
HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department advises that the Los Angeles Regional Water Quality Control Board (LARWQCB) is currently overseeing the cleanup of contaminated soil and groundwater at the project site resulting from a past release of gasoline from a former leaking underground storage tank. The LARWQCB should be contacted regarding the status of the onsite cleanup if not done so already.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

B1-4

B1-5

Cliff Stokes (Consultant)

From: Campomanes, Rochelle E. <RECampom@lasd.org>
Sent: Thursday, November 21, 2019 5:17 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus Project (DEIR_NOA)
Attachments: FPB Letter 191121 (Executed).pdf

Importance: High

Dear Mr. Stokes,

Please find the attached file for the project mentioned above. This is our review comments to the Draft EIR for Rancho Los Amigos South Campus Project.

Please let me know if you have any comments or questions. Thank you very much.

Rochelle Campomanes, LEED AP
Departmental Facilities Planner I
Facilities Planning Bureau
Tel: 323-526-5614



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OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



November 21, 2019

Mr. Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803

Dear Mr. Stokes:

REVIEW COMMENTS
NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT

The Los Angeles County Sheriff's Department (Department) is in receipt of the Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR), dated October 9, 2019, for the proposed Rancho Los Amigos South Campus Project (Project). The Project proposes to develop approximately 35 acres and will demolish 65 existing buildings to construct three new County administrative buildings: Internal Services Department Headquarters of approximately 315,000 Square Feet (SF); Probation Department Headquarters of approximately 168,000 SF; and the County Office Building of approximately 167,000 SF. Staffing for these buildings would be filled by approximately 3,000 County personnel who are currently at other existing County facilities located within the region. The proposed Project would also include (2) two parking structures, one (9) nine-story and the other a (3) three-story parking structure, miscellaneous site work and all the necessary utilities and point of connections, street widening, and other miscellaneous offsite improvements.

B2-1

The proposed Project is within the 74-acre Rancho Los Amigos South Campus (South Campus), located on a County-owned land within the City of Downey (City). The City has its own Police Department that provides law enforcement and security services. However, law enforcement services to the South Campus are provided by the Department's County Services Bureau (CSB).

B2-2

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Mr. Stokes

- 2 -

November 21, 2019

The proposed Project is located within the service area of CSB. Accordingly, the CSB reviewed the Request and authored the attached review comments (see correspondence dated November 21, 2019, from Captain Britta S. Steinbrenner).



B2-2

Thank you for including the Department in the environmental review process for the proposed Project. Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes at (323) 526-5614.

B2-3

Sincerely,

ALEX VILLANUEVA, SHERIFF

A handwritten signature in black ink, appearing to read 'T. Jue'.

Tracey Jue, Director
Facilities Planning Bureau

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: November 21, 2019

FILE NO:

OFFICE CORRESPONDENCE

FROM:


BRITTA S. STEINBRENNER, CAPTAIN
COUNTY SERVICES BUREAU

TO: TRACY JUE, DIRECTOR
FACILITIES PLANNING BUREAU

SUBJECT: REVIEW COMMENTS ON THE NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT

The Los Angeles County Sheriff's Department, County Services Bureau (CSB) reviewed the Notice of Availability of a Draft Environmental Impact Report (Draft EIR) dated October 9, 2019, for the proposed Rancho Los Amigos South Campus Project (Project). The proposed Project is within the 74-acre Rancho Los Amigos South Campus (South Campus), located on a County-owned land within the City of Downey (City). The City has its own Police Department that provides law enforcement and security services. However, law enforcement services for the South Campus are provided by CSB.

The proposed Project includes the development of approximately 35 acres of the South Campus area and would demolish approximately 65 existing buildings to construct three new County administrative buildings: Internal Services Department Headquarters of approximately 315,000 Square Feet (SF); Probation Department Headquarters of approximately 168,000 SF; and the County Office Building of approximately 167,000 SF. Staffing for these buildings would be filled by approximately 3,000 County personnel who are currently at other existing County facilities located within the region. The proposed Project would also include (2) two parking structures, one (9) nine-story and the other a (3) three-story parking structure, miscellaneous site work and all the necessary utilities and point of connections, street widening, and other miscellaneous offsite improvements.

B2-4

Section 5.4.5 of the Draft EIR, Public Services, indicates that it is likely that with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site. Additionally, the potential for vandalism and burglaries at the Project Site during Project construction would be reduced by the inclusion of security fencing and cameras during construction. Although the consultant's conclusion states that there will be a decrease in law enforcement services required, CSB remains concerned that the new development within the Campus will impact its ability to maintain adequate levels of law enforcement services. Meeting anticipated growth in demand will require additional personnel, radio cars, security vehicles, as well as parking spaces. CSB still believes that office space, for existing and additional CSB personnel will be needed and be large enough to accommodate desks, workstations, conference room, locker room with showers, restrooms and a small kitchen area. It should also be equipped with standard substation equipment such as computers, gun lockers, radio chargers, and any other needs which may arise at a later date.

B2-5

As mentioned in the previous comments that CSB submitted, we remain concerned with the potential vandalism, and more importantly, burglaries at the Project site during construction period and during "off-hours". CSB appreciates a collaborative partnership with the County, City, public safety, and the continued coordination of security measures as needed throughout construction and operation.

B2-6

CSB has no further comment at this time but reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed Project. Thank you for including CSB in the environmental review process for the proposed Project.

B2-7

Should you have any questions regarding this matter, please contact Captain Britta Steinbrenner at (213) 974-1120 or Lieutenant Mark H. Stone at (424) 338-2226.

BSS:MS

Cliff Stokes (Consultant)

From: Raza, Adriana <araza@lacsds.org>
Sent: Friday, November 22, 2019 11:17 AM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus
Attachments: Rancho_Los_Amigos_South_Campus_Project.pdf

CAUTION: External Email. Proceed Responsibly.

Mr. Stokes,

Attached please find a pdf copy of the DEIR Response letter for the subject project. The original was mailed today to your attention.

Adriana Raza

Customer Service Specialist | Facilities Planning Department
562-908-4288 ext. 2717 | araza@lacsds.org

SANITATION DISTRICTS OF LOS ANGELES COUNTY  

Converting Waste Into Resources | www.LACSD.org

November 22, 2019

Ref. DOC 5334693

Mr. Cliff Stokes, Projects Manager
Department of Public Works
County of Los Angeles
900 South Freemont Avenue, 5th Floor
Alhambra, CA 91803

Dear Mr. Stokes:

DEIR Response for the Rancho Los Amigos South Campus Project

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on October 19, 2019. The proposed project is located within the jurisdictional boundaries of District No. 2. Previous comments submitted by the Districts in correspondence dated August 28, 2017 (copy enclosed), to Mr. Luis Ramirez of your agency, still apply to the subject project with the following comments and updated information:

1. 2.4.1 Project Overview and Design-Build Process, *page 2-19*, Table 2-3 – The Proposed Building Development Summary describes the proposed project as a 315,000 square-foot Internal Services Department Headquarters, a 168,000 square-foot Probation Department Headquarters, a 167,000 square-foot County Office Building, and a combined 953,750 square-feet of parking space. Based on this description, the expected increase in average wastewater flow from the project site is 130,000 gallons per day.
2. 3.9.1 Existing Conditions, *page 3.9-2*, first paragraph under Surrounding Land Uses – The Notice of Preparation circulated for the subject project included the description of a 60,000 square-foot Sheriff's Crime Laboratory which may have required a Districts' permit for Industrial Wastewater Discharge. The Sheriff's Crime Laboratory found in this section is described as existing. Provided there is no anticipated expansion for the laboratory, item no. 1 of the enclosure no longer applies to the subject project.
3. 3.13.1 Existing Conditions, *page 3-13.-2*, second paragraph under Wastewater – An extensive network of sewer lines is described within this section, which may include Districts' facilities. As noted in item no. 2 of the enclosure, the Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin.
4. 3.13.1 Existing Conditions, *page 3-13.-2*, third paragraph under Wastewater – The Joint Water Pollution Control Plant (JWPCP) currently produces an average flow of 261.1 million gallons per

B3-1

B3-2

B3-3

B3-4

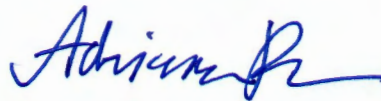
B3-5

day (mgd). The monthly average effluent dry weather discharge flow rate from the collection system to the headworks of JWPCP shall not exceed the dry weather flow capacity of 400 mgd, and an instantaneous maximum of 675 mgd during wet weather storm events.

5. 3.13.5 Environmental Impact Analysis, *page 3.13-12*, third paragraph under Water Supply and Wastewater – Wastewater generated by the proposed Project would be treated at JWPCP located at 24501 South Figueroa Street in the City of Carson, which has a capacity of 400 mgd. The facility provides both primary and secondary treatment for approximately 260 mgd. The monthly average effluent dry weather discharge flow rate from the collection system to the headworks of JWPCP shall not exceed the dry weather flow capacity of 400 mgd, and an instantaneous maximum of 675 mgd during wet weather storm events. Please adjust figures accordingly.
6. 3.13.5 Environmental Impact Analysis, *page 3.13-16*, Impact UTL-3 – Figures determined within this information were calculated based on estimates provided from the enclosed copy. Please adjust percentages to reflect the average wastewater flow determined in item no. 1 of this letter. Percentages should also be based on JWPCP's dry weather flow capacity of 400 mgd. This facility provides primary and secondary wastewater treatment (not tertiary).

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: E. Stewart
A. Schmidt
A. Howard



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

August 28, 2017

Ref. Doc. No.: 4243608

Mr. Luis Ramirez
Capital Projects Program Manager
County of Los Angeles
Department of Public Works
900 South Fremont Avenue, 5th Floor
Alhambra, CA 91803

Dear Mr. Ramirez:

NOP Response for the Rancho Los Amigos South Campus Project

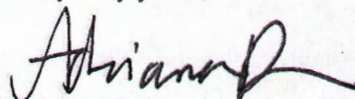
The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on August 9, 2017. The proposed project is located within the jurisdictional boundary of District No. 2. We offer the following comments regarding sewerage service:

1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp.
2. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts' buildover procedures and requirements go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Buildover Procedures and Requirements link. For more specific information regarding the buildover procedure, please contact Mr. Ed Stewart at (562) 908-4288, extension 2766.
3. The wastewater flow originating from the proposed project will discharge directly to the Districts' Joint Outfall B Unit 1C Replacement Trunk Sewer, located in a private right of way within the project site. The Districts' 66-inch diameter trunk sewer has a capacity of 65.8 million gallons per day (mgd) and conveyed a peak flow of 54.9 mgd when last measured in 2012. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit, issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at (562) 908-4288, extension 1205.
4. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average recycled water flow of 253.4 mgd.

5. The expected average wastewater flow from the proposed project, described in the notice as a 370,000-square-foot ISD Headquarters building, a 220,000-square-foot Probation Department Headquarters building, and a 60,000-square-foot Sheriffs Crime Laboratory, is 136,000 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
6. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: L. Shadler
E. Stewart
M. Sullivan
M. Tatalovich

Cliff Stokes (Consultant)

From: Reina Schaetzel <RSchaetzel@paramountcity.com>
Sent: Friday, November 22, 2019 11:48 AM
To: Cliff Stokes (Consultant)
Subject: Comments to DEIR for Rancho Los Amigos South Campus Project
Attachments: 112119 Comments to DEIR - Rancho Los Amigos South Campus.pdf

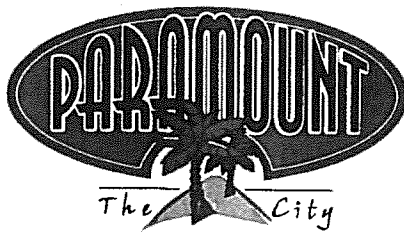
CAUTION: External Email. Proceed Responsibly.

Hi Cliff,

Please see attached. Also, please let me know when you receive this email. Thank you and have a nice weekend.

Reina Schaetzel
Associate Planner
City of Paramount
(562) 220-2060

The information contained in this e-mail message is information protected by the attorney-client and/or the attorney/work product privileges. It is intended only for the use of the individual or individuals named above, and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this message or any other reader of the message is not the named recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (562) 220-2027 or email us at crequest@paramountcity.com.



Planning Department
(562) 220-2036

November 21, 2019

ATTN: Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Freemont Ave., 5th Floor
Alhambra, CA 91803
CStokes@dpw.lacounty.gov

RE: Notice of Availability of the Draft Environmental Impact Report (EIR) for the Rancho Los Amigos South Campus Project

Dear Mr. Stokes:

This letter is in regard to request for comments to the release of the Draft EIR for the Rancho Los Amigo South Campus Project for three new Los Angeles County administrative buildings totaling 650,000 square feet in area and staffing approximately 3,000 County employees on 74 acres south of Imperial Boulevard approximately one mile east of the 710-freeway. The City of Paramount appreciates the opportunity to comment on this project and offers the following comments.

B4-1

We are deeply concerned with the traffic impacts to the neighborhoods to the south and east of the project, including the residential neighborhoods within Paramount. New developments will increase traffic volumes on nearby streets such as Paramount Boulevard. We respectfully request that the project incorporate appropriate street-widening and traffic signal mitigations. It is essential for Los Angeles County to be responsible for upgrades to traffic signals. We also ask to maximize safe pedestrian routes and active transportation elements surrounding the project.

B4-2

Additionally, we are concerned about the air quality impacts that may result from the project during construction and limitedly during future operation. The City of Paramount is committed to maintaining clean air and encourages the project to be in full compliance with all Air Quality Management District requirements as well.

B4-3

Thank you again for the opportunity to comment on the project. We look forward to reviewing the Final EIR and being able to comment on future developments.

B4-4

If you have any questions, please contact me at (562) 220-2048 or by email at jcarver@paramountcity.com.

CITY OF PARAMOUNT

A handwritten signature in black ink, appearing to read "John Carver".

John Carver
Planning Director

Letter B5

Felicia Yang

From: Joe Perez <jperez@sogate.org>
Sent: Friday, November 22, 2019 4:26 PM
To: Cliff Stokes (Consultant)
Cc: Vincent Yu; Felicia Yang; Arturo Cervantes; Jose Loera; Candida Neal; Dianne N. Guevara
Subject: City of South Gate's Comment Letter - LA County RLA South Campus Project Draft EIR
Attachments: South Gate Comment Letter - County DEIR.pdf

CAUTION: External Email. Proceed Responsibly.

Hello Cliff,

Attached is the City of South Gate's comment letter regarding the LA County's Rancho Los Amigos South Campus Project Draft Environmental Impact Report.

It would be greatly appreciated if you would confirm receipt of this e-mail and letter. If you have any questions, please do not hesitate to contact me by e-mail or on my cell at (562) 882-2706.

Best regards,



Joe Perez
Community Development Director
City of South Gate
8650 California Avenue, South Gate, CA 90280
P: (323) 563-9566
E: jperez@sogate.org
W: cityofsouthgate.org



Community Development Department

Joe Perez, Director of Community Development

8650 California Avenue, South Gate, CA 90280-3004

P: (323) 353-9566 F: (323) 563-9571

www.cityofsouthgate.org

November 21, 2019

Mr. Cliff Stokes, Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
Cstokes@dpw.lacounty.gov

Comments on the LA County, Rancho Los Amigos South Campus Project Draft Environmental Impact Report (Draft EIR, SCH #2017081017)

The City of South Gate appreciates being provided this opportunity to comment on a regionally significant project that will surely have significant environmental impacts on our residents and business community in the coming years. While we recognize the need for new County facilities to meet both the existing and future demand of all County residents, the requisite planning must occur in a deliberate and careful manner. We are concerned that the lack of careful and thoughtful planning will lead to unforeseen impacts that could have otherwise been avoided. Our concerns are only reinforced following our review of the Draft Environmental Impact Report (Draft EIR) that was prepared for the Rancho Los Amigos South Campus Project (SCH# 2017081017).

B5-1

The Draft EIR understated or ignored many of the proposed project's impacts and completely fails in the identification of effective mitigation for a number of key issue areas. The proposed development is a *regionally significant project* that will directly result in more than 7,443 new daily vehicle trips being generated within a relatively compact geographic area. The arterial roadway corridors located in this portion of Los Angeles County, such as Imperial Highway, Firestone Boulevard, and Atlantic Avenue are among the most congested in the region. Of these 7,443 daily trips, 1,038 trips and 884 trips will occur during the morning and evening peak hours, respectively.

B5-2

Even assuming these figures are correct, which we believe is an underestimate since the actual trip rate calculations used the traffic generation data for general office uses as opposed to governmental office uses, the traffic impact on the surrounding community will be life-changing. We cannot understand how the project site can possibly accommodate more than 3,500 employees and more than 7,400 vehicle trips on an average work day. Not even discussed in the Draft EIR, are the cumulative impacts from nearby related projects that are already approved or being planned. For this reason, the City of South Gate requests that our comments be carefully considered by the Lead Agency and incorporated into a revised and recirculated EIR.

B5-3

We have included detailed point-by-point comments on the pages that follow that underscore our many concerns with the proposed project and the anticipated environmental impacts.

B5-4

CEQA Process

Comment #1, Page 1-4, Failure to Fully Consider Scoping Comments

The Lead Agency failed to seriously consider all of the comments that were provided by local residents regarding the proposed project's potential environmental impacts. The Draft EIR makes the following statement:

"A total of 26 comments were received in response to the NOP, including 20 written letters/emails and 6 verbal comments (3 of which provided speaker cards) that were transcribed from the public scoping meeting. Comments generally requested information regarding traffic, building massing, public safety, public services, and the scope of the Project description. Information received during the scoping process has been incorporated into this Draft EIR and indicated accordingly within each technical analysis."

B5-5

The more significant concerns that were raised by both City of South Gate staff and our local residents were related to traffic impacts. This section of the Draft EIR does not provide a comprehensive listing of those concerns, or where those concerns are specifically addressed in the Draft EIR. In addition, "fire services" was identified as an issue of concern though it was not addressed in the Draft EIR.

Project Location and Setting

Comment #2, Page 2-1, Chapter 2.1 Confusion Regarding the Project Location

The following statements are confusing and appear to contradict each other (refer to the italics). It is our understanding that the project would be located within a 35-acre area inside the larger South Campus area:

"All activities associated with the proposed Project would be located entirely on the South Campus (also referred to as the Project Site). New County facilities and associated infrastructure would be constructed within a 35-acre portion of the Project Site referred to as the Development Area and would include demolition of existing structures. Building demolition, infrastructure construction, and remediation would take place on the remainder of the Project Site, outside of the proposed Development Area."

B5-6

The Draft EIR must indicate the location and extent of the project improvements that would be located within the remainder of the South Campus. It is our understanding that the remediation, building demolition and infrastructure would be required to accommodate the new buildings and parking structures.

Comment #3, Page 2-4, Chapter 2.1 Future Development in Adjacent Area

The proximity of the MTA's proposed Gardendale Station is an important cumulative project given the station's close proximity to the project area. The Draft EIR casually mentions the MTA's Transit Oriented Development (TOD) Strategic Implementation Plan is being prepared. However, no information other than the following statement is provided:

B5-7

"The development of the TOD by the new Gardendale Station is speculative and may be developed in the future."

Given that the City of Downey is in the process of preparing a Draft EIR for an updated Specific Plan for the planning area that surrounds the proposed Gardendale Station, as well as the South Campus portion of the project site, the County's Draft EIR should be more forthcoming in describing the long-range planning vision for this area so that the cumulative land use and traffic impacts may be evaluated. The City of Downey circulated a Notice of Preparation (NOP) concerning an EIR that was being initiated for the proposed specific plan. It appears the latter project is much further along than what is alluded to in the County's Draft EIR. The City of Downey's Draft EIR is anticipated to be released in the next few months. The NOP indicates a variety of uses are being contemplated including industrial, commercial, retail, residential development, and open space.

B5-7

Comment #4, Page 2-4, Chapter 2.1.2 Project Setting and History

The following statement at the bottom of the above-referenced page is confusing (see italics) and clarification is needed:

"The Project Site contains 107 buildings and structures, all of which have been assigned a Los Angeles County number (LACO No.) as depicted in Figure 2-3, as well as two other features, including a Moreton Bay Fig Tree and the Rancho Los Amigos Site Plan, resulting in 109 total features on the Project Site."

B5-8

Comment #5, Page 2-12, Chapter 2.2 City of Downey Specific Plan is not Analyzed

The following statement underscores the need to revise and recirculate the Draft EIR to ensure that the analysis is comprehensive. The City of Downey's Specific Plan constitutes a significant portion of the planning area, including a large portion of the 75-acre south campus that is not being developed by the County as part of the proposed project. The Draft EIR makes the following statement:

"The City of Downey's Specific Plan does not provide detailed zoning for the South Campus. Discussions are underway with the City of Downey regarding the development of a revised Specific Plan to ensure conformity with the County's long-term goals for the South Campus. Included in the revised Specific Plan will be zoning for a planned future transit station adjacent to the South Campus which would allow the site to comply with the County Facility Location Policy."

B5-9

The above statement is not accurate (refer to italics). According to the adopted Rancho Los Amigos Specific Plan (SP 85-1), the entire Specific Plan area, including the South Campus, is designated for industrial and office uses. The stated build-out is 90,000 square feet for a new County Courthouse building, 600,000 square feet of new offices, and 1,200,000 square feet of business park uses. In addition, 50-acres (referred to as "Parcel D") would also be developed as an industrial park and 65-acres (referred to as "Parcel H") would be developed as a consolidation of hospital facilities. According to the City of Downey's General Plan, the entire Planning Area is designated as "Commercial Manufacturing." The balance of the property not included in the County's current development plan should be assumed to be developed according to the applicable City of Downey's General Plan. As stated previously, the City of Downey issued a Notice of Preparation (NOP) concerning an EIR that was being initiated for the proposed specific plan. The NOP

indicates a variety of uses are being contemplated including industrial, commercial, retail, residential development, and open space.

↑ B5-9

Comment #6, Page 2-12, Chapter 2.2 Sport Center is not Analyzed

The Draft EIR did not provide a comprehensive evaluation of related projects or their cumulative impacts. For example, the Draft EIR stated the following:

"The proposed Sports Center, which was approved as a separate project by the Los Angeles County Board of Supervisors in November 2016, will provide multiple soccer fields with night time lighting, restrooms, a concession stand, equipment storage room, and a surface parking lot for community use."

B5-10

The Draft EIR indicated that the County determined that the Sports complex was "categorically exempt" since the affected area was under 5 acres in area. We request that the County provide the necessary environmental analysis of potential lighting, noise, and traffic impacts that were prepared to support the findings in support of an exemption. The location and extent of the cumulative projects need to be accurately identified in the recirculated Draft EIR.

Comment #7, Page 2-13, Chapter 2.2 Full Disclosure of Related Projects

The Draft EIR states the following:

"Since the August 9, 2016 Board letter also directed the County to provide a South Campus Space Plan consistent with the City of Downey's Specific Plan and potential future transit-oriented development around the proposed future transit station, the County decided to plan for parcels near and adjacent to the proposed Metro Gardendale transit stop to be open and available for future use."

B5-11

The recirculated Draft EIR's analysis must be expanded to consider the future potential development in the South Campus area and around the proposed station. This lack of analysis is a significant shortcoming in the identification of long-range cumulative impacts. As indicated previously, the location and extent of the cumulative (related) projects need to be accurately identified in the recirculated Draft EIR.

Comment #8, Page 2-13, Chapter 2.2 Analysis of All of the Nearby Related Projects

The Draft EIR acknowledges that the proposed future development will employ up to 3,840 employees within the project area. This figure will increase significantly when considering the additional employment from potential new development within the other "planned" development adjacent to the Rancho Los Amigos South Campus. This potential new development must be identified and analyzed in the recirculated Draft EIR to ensure that the cumulative impacts are clearly understood along with any attendant mitigation.

B5-12

Comment #9, Page 2-18 and 2-19, Chapter 2.4 Description of the Future Development within the Larger Project Area

The Draft EIR indicates, "...the full build-out of the proposed Project would encompass up to 650,000 square feet of developed floor area within the approximately 35-acre Development Area portion of the larger 74-acre Project Site." Equally significant, the project will employ in excess of 2,700 persons and generate approximately 7,000 vehicle trips on a daily basis. All of these employees and vehicle trips will be generated by land uses and development located within a 35-acre portion of the South Campus. The recirculated Draft EIR must indicate how much development will potentially occur on the remaining 39-acres.

B5-13

Comment #10, Page 2-19, Chapter 2.4 Project Description Lacks Specificity

However, the number of buildings and their height varies in the Draft EIR. In addition, the Los Angeles County representative also indicated in the community meetings that the actual number of buildings, their height, and presumably their floor area may be different from that identified in the Draft EIR. It is also surprising that at this stage in planning the County isn't sure about the number and configuration of the new buildings. For example, the Draft EIR indicates the "[P]robation Headquarters would be co-located with the ISD Headquarters and would be up to approximately 168,000 square feet in size and a maximum height of approximately 90 feet or six stories above finished grade." In addition, there was a lack of clarity regarding parking structures as opposed to surface parking lots. Not having a more refined site plan at this stage of planning will make it more difficult to evaluate onsite circulation and parking layout. The placement and lot coverage of these project elements make it difficult to evaluate a number of issues.

B5-14

Comment #11, Page 2-24, 2.4.4 Open Space and Landscaping

The following paragraph underscores our concerns regarding deferring a detailed analysis until some future time (please note the italicized portion of the paragraph).

"Approximately 8.4 acres in the Development Area would be designated as open space, and 4.25 acres or 183,000 square feet would be landscaped. The Project Site, outside of the Development Area, would have [sic] graded with irrigation install [sic], and also hydroseeded with a native seed mix. *This area would remain as open space until such time future development is proposed and approved.*"

B5-15

We are assuming that the reference to "The Project Site, outside of the Development Area" is referring the remaining 39-acres of the 75-acres not included within the County's 35-acre development area. At a minimum, the Draft EIR should have considered a potential development concept that is consistent with the applicable General Plan and Specific Plan designations. We are concerned that the Lead Agency is promoting so much flexibility so that future modification to the site plan and/or design would not be analyzed. Without certain specificity, future site plan modification may be implemented in the absence of the full disclosure afforded under CEQA.

Comment #12, Page 2-26, 2.4.6 Parking, Access, and Circulation

The Draft EIR commits to the following parking supply in the project description:

B5-16

"A minimum of six percent of the required parking spaces would be designated as electric vehicle charging stations for both the surface parking and the parking garage. Eight percent of the required parking spaces shall be assigned to low emitting, fuel efficient, carpool/van pool vehicles."

↑
B5-16

The above must be identified as a mitigation measure in either the analysis of air quality, greenhouse gas emissions, or traffic.

Comment #13, Page 2-29 and 2-30, Chapter 2.5 Soil and Groundwater Remediation

The Draft EIR indicated that the presence of underground storage tanks (USTs) has resulted in subsurface soil and groundwater contamination, and there is currently an open case with the LARWQCB which is the regulatory agency responsible for ensuring clean up to state standards. The Draft EIR goes on to state that a work plan is currently being prepared for approval by the Los Angeles Regional Water Quality Control Board (LARWQCB) to address the cleanup. This remediation would be implemented as part of the proposed project's implementation.

B5-17

The total volume of soil to be excavated is estimated at 12,000 cubic yards. This includes approximately 6,667 cubic yards of clean soil generated during removal of overburden to reach the hydrocarbon-bearing soil at a depth of approximately 25 feet below grade, and approximately 5,333 cubic yards of hydrocarbon bearing soil that would require treatment or disposal at a facility permitted to accept the waste. The transport of this contaminated soil would require approximately 550 trucks (or more than 1,000 trip ends). These trucks along with the excavators and other equipment would generate both particulate and NOx emissions. These impacts must be considered in the analysis included in the re circulated Draft EIR.

Comment #14, Page 2-30, Chapter 2.5 Quantities of Soil Import

Groundwater is anticipated to be encountered at the base of the remedial excavation, at approximately 45 feet below the ground surface (bgs). As indicated in the Draft EIR, the hydrocarbon impacted groundwater would be vacuumed out and transported to a disposal facility in Compton for treatment. Approximately 25,000 gallons of this groundwater would be removed for treatment. The excavated areas would be backfilled by both clean onsite soils and imported soils. The recirculated Draft EIR must provide an estimate of the quantities of *imported* soil that would be required in order that the truck traffic and the attendant air quality, noise and vibration, and traffic impacts may be evaluated.

B5-18

Comment #15, Page 2-33, Chapter 2.6 Development Possible in the Remainder of the Site

The Draft EIR again makes the following statement that seems to defer the identification of related projects to some future point in time (please note the *italics*):

"[T]he Site would be graded and irrigation would be installed, and hydroseeded with a native seed mix, and *would remain as open space until such time future development is proposed and approved.* In total, 105 buildings and structures, covering approximately 496,163 square feet, would be demolished and removed from the Project Site."

B5-19
↓

As stated previously, the potential development that could occur within the remaining portions of the South Campus must be identified. A NOP was recently circulated by the City of Downey for this area though no mention is provided in the Draft EIR.

↑ B5-19

Comment #16, Page 2-33, Chapter 2.7.3 Geographic Scope is Incorrect

Table 2-6 indicates the geographic scope of the cumulative impact analysis. Significantly, the City of South Gate is not identified even though it is located adjacent to the South Campus Project.

B5-20

Comment #17, Page 2-38, 2.7.6 List of Related Projects is Incorrect

The Draft EIR identified the following more significant cumulative (related) projects:

“The five most relevant projects in terms of potential cumulative impacts are projects located at and in the immediate proximity of the Project Site and potential for overlapping construction activities, including: (1) West Santa Ana Branch Transit Corridor; (2) Rancho Los Amigos National Rehabilitation Center Consolidation Project; (3) Rancho Los Amigos South Campus Sports Center Project; (4) Downey Recuperative Care Center Project; and (5) the City of Downey Rancho Los Amigos Specific Plan Update.”

The following three related projects will have a direct bearing on the future development and the attendant impacts within the South Campus:

The Gardendale Station, West Santa Ana Branch Transit Corridor. The MTA is evaluating a new light rail transit (LRT) line that will connect southeast LA County to downtown Los Angeles. The West Santa Ana Branch Transit Corridor (WSAB) Project is a 19-mile corridor undergoing an Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) process to prepare the corridor for the LRT. The Draft EIR is expected to be released by MTA by December 2020. The WSAB line includes a new rail station (i.e. Gardendale Station) that will be located along the western edge of the Rancho Los Amigos South Campus and in close proximity to the proposed County office development.

B5-21

Rancho Los Amigos South Campus Sports Center Project. The new Sports Center will be located within the Rancho Los Amigos South Campus along Gardendale Street, in close proximity to the proposed County office development. The County is expected to begin construction in early 2020, with estimated completion in the first quarter of 2021. This project relied on a Categorical Exemption (CE) though, under CEQA, certain findings must be supported by the appropriate technical analyses which address issues such as traffic, parking, noise, visual impacts, etc.

The City of Downey Rancho Los Amigos Specific Plan Update. The Draft EIR indicated that “[T]he Specific Plan update is still in the conceptual phase and no specific redevelopment projects are currently proposed or under consideration for the remaining parts of the South Campus.” This statement was made in spite of the fact that a Draft Specific Plan is expected to be available during the winter of 2019, and the NOP indicates a variety of uses are being contemplated, including industrial, commercial, retail, residential development, and open space.

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Unfortunately the Draft EIR made no effort to conduct a meaningful analysis of the cumulative environmental impacts of these critical related projects together with those of the proposed project. Instead, the Draft EIR deferred the analysis by indicating that the only project-related information for these related projects is too speculative or unavailable.

The list of related projects is also missing several critical related projects located in the City of South Gate. The related projects include the following:

Former American Legion Site: There is a vacant, 97,400 square foot parcel located at 11269 Garfield Avenue which lies within Downey's city limits and is owned by Los Angeles County. This site formerly contained American Legion Post 723 and is within Downey's Rancho Los Amigos Specific Plan area and in close proximity to the proposed County office development. The County solicited and received proposals from developers for the construction of a permanent supportive housing development on the site. The County is finalizing an Exclusive Negotiation Agreement with a team of developers (PATH Ventures and Abode Communities) for the development of 100 apartment units at the property for low-income and homeless individuals/families, including veterans.

Tweedy & Atlantic Site: This 3.84-acre site is at 9323 Atlantic Avenue, located on the southwest corner of Atlantic and Tweedy Boulevard. This was a former location for an Adohr Farms Milk and has remained as a vacant lot for some time. This site has been entitled for a mixed use development that will include 91 residential units and approximately 40,000 square feet of commercial.

The recirculated Draft EIR must include a complete listing of the related projects along with the analysis of cumulative impacts for those issue areas analyzed in the EIR.

Environmental Impacts - Aesthetics

Comment #18, Page 3.1-22, Potential Development is Unclear

The discussion of aesthetic impacts once again alludes that there is more than one possible project scenario as discussed previously. In this section of the Draft EIR, it is stated that the project would include the construction of three new buildings though the ISD Headquarters and Probation Headquarters may potentially be connected into one building, resulting in a total of two new buildings. Again, we are concerned that the project description is yet to be clearly defined at this stage of planning. As stated previously, we are concerned that the Lead Agency is allowing for so much flexibility that future modification to the site plan and/or design would not be analyzed. Without certain specificity, future site plan modification may be implemented in the absence of the full disclosure afforded under CEQA.

Comment #19, Page 3.1-23, Future Development is not Adequately Described

The Draft EIR fails to describe the proposed project in a meaningful manner. With respect to the buildings' design, the Draft EIR states the following:

"The ultimate design of the buildings would be determined during the design phase. However, the intent is that these buildings would be designed to comply with the Secretary of Interior Standards.

The new construction would be required to be compatible with the massing, size, scale, and architectural features of the adjacent historic resources, yet be differentiated from the old ensuring that the historic resource remains the focal point."



B5-23

The above narrative is completely lacking a meaningful analysis of how the project would appear. For example, a block diagram illustrating the height and mass of the new buildings would help the reader in understanding the potential impacts as opposed to what was provided in the Draft EIR. A clear description of the potential project must be provided in the recirculated Draft EIR.

Comment #20, Page 3.1-24, Effectiveness of Mitigation is Unclear

The Draft EIR acknowledges that the visual character of the Project Site would change as a result of the proposed Project. More than 100 historic buildings would be demolished to accommodate the proposed project. Please explain how the implementation of Mitigation Measures MM-CUL-1b and CUL-1c, would mitigate these impacts. The Draft EIR simply states "[the proposed project] would not substantially degrade the existing visual character or quality of the site and its surroundings as the visual character would be preserved through the new buildings and/or interpretive program on the Project Site." The recirculated Draft EIR must indicate how the proposed mitigation will effectively mitigate potential impacts. The analysis in the recirculated Draft EIR must include visual representations of how the site will look before and after development.

B5-24

Comment #21, Page 3.1-26, Deferred Analysis and Mitigation

The Draft EIR states the following with respect to light and glare:

"The Project's materials would have low illumination that would reduce spillover and have low glare potential. Prior to issuance of applicable building permits, the Design Builder and the Los Angeles County Department of Public Works would review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials and would not adversely affect views of motorists or other nearby light-sensitive receptors. For nighttime glare, light emanating from building interiors or lighting from the parking areas could generate glare that would contrast with the dark sky or ambient darkness."

B5-25

The statement noted in italics is essentially deferring analysis and any requisite mitigation. The purpose of the Draft EIR is to disclose the proposed project's environmental impacts. The Lead Agency must disclose these potential impacts as part of the recirculated Draft EIR.

Comment #22, No Analysis of Shade and Shadow Impacts

The three new buildings along with the new parking structures will result in the construction of taller buildings that could result in shade and shadow impacts. The Draft EIR simply concludes that, "... Therefore, such shade and shadow impacts would be significant and unavoidable." No effort was made to provide an illustration of these potential impacts so the neighboring residents could have an understanding of the shade and shadow impacts. We request this information be provided in the recirculated Draft EIR.

B5-26

Environmental Impacts – Air Quality

Comment #23, Page 3.2-34, Effectiveness of Mitigation

The Draft EIR summarizes the results of the unmitigated criteria pollutant calculations from construction activities in Table 3.2-4. As shown in Table 3.2-4, construction-related daily VOC and NO_x emissions would exceed the SCAQMD regional significance thresholds. The Draft EIR then concludes that the VOC and NO_x emissions from construction activities would be significant and mitigation measures would be required. The Draft EIR does not quantify the effectiveness of those mitigation measures identified at the end of this section. This information must be provided in the recirculated Draft EIR.

B5-27

Comment #24, No Analysis of Haul Trucks and Haul Routes

The Draft EIR concluded that the regional NO_x operational emissions would be regionally significant and unavoidable, including the associated health effects. The recirculated Draft EIR must take into account the impacts related to the use of haul trucks in the transport of fill and export of contaminated soils. These activities would result in both particulate and NO_x emissions.

B5-28

Comment #25, Page 3.2-40 and 41, Effectiveness of Air Quality Mitigation

The Draft EIR states the following:

“As shown in Table 3.2-8, without mitigation, the project would exceed the 1-hour threshold for NO₂. Therefore, localized construction impacts, including associated health effects, would be significant, requiring mitigation.”

B5-29

Table 3.2-8 *does not* identify an exceedance for NO₂, rather the exceedance of carbon monoxide. The recirculated Draft EIR must explain the effectiveness of the referenced mitigation to reduce potential carbon monoxide emissions.

Environmental Impacts – Biological Resources

Comment #26, Page 3.3-14, Tree Preservation Policies

The Draft EIR under the section that includes a discussion of the applicable specific plan makes the following statement,

“Under California Government Code Section 65402, as further discussed in Section 3.9, Land Use and Planning, of the Draft EIR, the Project would not be required to be consistent with the City’s Specific Plan as the Project would develop County uses on County-owned land. While the City of Downey’s policies do not apply to the Project due to an exemption under Government Code sections 53090 and 53091, this policy is provided for informational purposes only. The Rancho Los Amigos Business Center Specific Plan 88-1 was produced by the City of Downey to guide the planning and development of an area that includes the Project Site. Subsection Q (Tree Preservation Plan) of Section VIII (Implementation and Monitoring) identifies 36 significant trees (based upon size, age, species, form, and health) within the specific plan area.”

B5-30

The Draft EIR indicates that the County is not required to adhere to the local jurisdiction's tree preservation requirements. It is important to note the following CEQA threshold:

[Would the project] conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

With that said, we support the County's commitment to the implementation of Mitigation Measure MM-BIO-3 (MM-BIO-3) that calls for a replacement ratio of 2:1.

Environmental Impacts – Cultural Resources

Comment #27, Page 3.4-14, Consultation with Native American Tribes

It is unclear in the Draft EIR whether the necessary AB-52 consultation was completed. On the top of the page a reference is made to "Appendix #." We believe this is a typographic error. The reference should apply to Appendix D.

Comment #28, Page 3.4-17, Archaeological Sensitivity

The Draft EIR indicated that the project area is considered to be located in an area of high sensitivity. The Draft EIR states the following:

"The Project Site is considered to have a high sensitivity for the presence of buried archaeological sites based upon the following factors: the Holocene to late Pleistocene age of soil parent material; the historic proximity of the Project Site to perennial sources of water including to the confluence of the Los Angeles River and the Rio Hondo; depositional processes given the proximity to the rivers; the gentle slopes within the area; the proximity to documented Gabrielino villages and their associated territories; the limited nature of previous subsurface disturbances based on the type and age of extant development on the Project Site; and the limited native ground surface visibility during the archaeological survey.

In this instance, AB-52 consultation with the Gabrielino-Kizh is advisable given their extensive local knowledge and oral tradition with respect to village and ceremonial locations. The recirculated Draft EIR must clearly indicate that the requisite AB-52 consultation was completed.

Comment #29, Page 3.4-27 and 28. Conformity with County Policies Governing Historic Resources

This section of the Draft EIR includes a listing of relevant Los Angeles County General Plan goals and policies with respect to cultural resources. These policies include the following:

Goal C/NR 14: Protected historic, cultural, and paleontological resources.

Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.

Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).

Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.

Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Given the potential for the complete and total destruction of the project area's cultural resources, the County appears to be in violation of its own General Plan as part of the proposed project's implementation. The recirculated Draft EIR should clearly indicate how the proposed project's implementation will conform to the aforementioned policies.

Environmental Impacts – Energy

Comment #30, Page 3.5-1, No Mitigation Identified

It is unclear why the Draft EIR did not call out any project-specific mitigation measures that would be effective in reducing the on-site electrical and natural gas consumption. For example, new parking fields and/or parking structures could use solar panels and similar equipment. The Draft EIR only references broad and general measures that could apply to any development project. The recirculated Draft EIR must include clear and effective mitigation that would translate into concrete and effective mitigation.

Comment #31, Page 3.5-10, Sources of Energy Consumption Must be Identified

The proposed project will involve a significant amount of new building floor area that will translate into additional electrical and natural gas consumption. Table 3.5-4 indicates that building electricity alone will consume approximately 668,000 gallons of gasoline and 85,000 gallons of diesel fuel on an annual basis. A variety of sources supply power in the South Coast Basin. The recirculated Draft EIR must explain the relationship between the fossil fuel consumption and the electrical generation.

Environmental Impacts – Greenhouse Gas Emissions

Comment #32, Page 3.6-1, GHG Thresholds

We recognize the difficulty in obtaining GHG thresholds given the lack of information in this regard from both the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD). The 3,000 MTCO₂e is conservative. More significantly, there is considerable disparity in the threshold among the various air pollution control districts throughout the State. Please confirm that the thresholds used in the analysis are current in the recirculated Draft EIR.

Comment #33, Page 3.6-1, Complete Lack of Effective Mitigation

The Draft EIR fails to include any meaningful mitigation to address GHG impacts. Referencing two mitigation measures related to the testing and use of emergency generators will have limited utility. The transportation demand management (TDM) will be more effective given that the majority of the GHG emissions are related to mobile sources. Additional mitigation needs to be identified. These may include ride-sharing, transit use, charging stations, etc., that would be effective in reducing mobile emissions. These additional mitigation measures and their effectiveness need to be identified in the recirculated Draft EIR.

B5-37

Environmental Impacts – Hazards and Hazardous Materials

Comment #34, Page 3.7-26, Demolition Impacts

During the extensive demolition and site preparation activities, there is a potential for the release of a number of contaminants such as lead based paints (LBP), asbestos containing materials (ACMs), mercury (from fluorescent lights), and contaminated soils. A significant amount of potentially contaminated demolition debris will be removed from the project site for disposal. The recirculated Draft EIR must indicate the quantities of these materials that will be removed, identify the haul routes, and where these materials will be disposed of.

B5-38

Comment #35, Page 3.7-29, Lane Closures and Traffic Impacts During Demolition and Construction

The Draft EIR includes the following generalized assurance that states the following:

“All of the demolition and construction activities would occur within the boundaries of the Project Site, which would not interfere with traffic in the surrounding area such that emergency response or evacuation plans would be significantly affected. In addition, as described in Section 3.11, *Transportation* the construction traffic management plan to alleviate construction period impacts and control the construction traffic in and out of the Project Site. As a result, there would be no lane closures outside of the Project Site and therefore the impact to an emergency response plan or emergency evacuation plan would be less than significant.”

B5-39

We often observe significant traffic disruptions from much smaller projects compared to the Rancho Los Amigos South Campus project. The recirculated Draft EIR must clearly indicate how is it possible that lane closures will not occur when new infrastructure connections and other street improvements will be required. This is especially critical given the importance of Imperial Highway and Gardendale Street. Please re-evaluate these potential street closure and lane disruption impacts in the recirculated Draft EIR.

Environmental Impacts – Hydrology and Water Quality

Comment #36, Page 3.8-24, Impervious Surfaces and Storm Water Runoff

B5-40

The Draft EIR makes the following statements regarding the potential surface water runoff impacts (please note the italicized portions).

"The proposed Project would have a similar amount of impervious surfaces when compared to current conditions. Compliance with the NPDES Municipal Permits and its MS4 BMP requirements implemented in the SQMP, the Downey Municipal Code, LID practices, and all applicable BMPs pertaining to water quality standards, waste discharge requirements, and surface and ground water quality would ensure operational environmental impacts to water quality standards and waste discharge requirements during long-term operation of the proposed Project would be less than significant.

The Draft EIR did not include any comparative analysis indicating the location and extent of impervious surfaces for both pre-project and post-project conditions. Absent this information, it is not possible to provide quantification for surface water flows, storm water drainage impacts, and any necessary improvements. The Draft EIR only provides generalized statements that there will not be a significant change in surface conditions without any supporting evidence. This information must be provided in the recirculated Draft EIR.

Environmental Impacts – Land Use and Planning

Comment #37, Page 3.9-11, Conformity with the Applicable Specific Plan

The Draft EIR indicates the proposed project is inconsistent with the applicable Specific Plan (SP 88-1A). The Draft EIR states the following (please note the italicized portions):

SP 88-1A designates a maximum building height of 75 feet so long as the development is 400 feet or more from any residential designations. Setbacks from residential designations ranging from 250 to 400 feet dictate a maximum building height of 55 feet. Setbacks from residential designations ranging from 200 to 250 feet dictate a maximum building height of 45 feet. Setbacks from residential designations ranging from 140 to 200 feet dictate a maximum building height of 35 feet. No buildings are permitted when setbacks from residential designations are less than 140 feet. The Project would be inconsistent with the policies of the SP 88-1A as it relates to building setbacks, height limitations, and landscaped buffers. *However, as the Project would be exempt from SP 88-1A, the Project's inconsistencies with SP 88-1A does not denote a significant environmental impact under Impact LUP-2.*

By making this finding in the Draft EIR, the County is acknowledging that the proposed development is inconsistent with the City of Downey's development standards which are specifically designed to protect the nearby residential neighborhoods from the proposed large buildings. We disagree with the Draft EIR's assertion that these inconsistencies do not denote a significant impact. These inconsistencies must be addressed more fully in the recirculated Draft EIR.

Comment #38, Page 3.9-12 and 13, Chapter 3.9 Land Use Conformity with Local Regulations

The Draft EIR included some inconsistent statements regarding land use compatibility and conformity. The first sentence in the last paragraph on page 3.9 states the following:

"The implementation of the proposed Project is consistent with the applicable policies, plans, regulations, and land use designations set forth by the County *and the City*."

In contrast, the following statement is provided later in the same paragraph:

"For the County-owned cumulative projects located on County land (e.g., cumulative projects 2, 3, and 4), these projects *would only be subject to consistency* with the County's General Plan 2035."

The proposed project does not comply with established development regulations and standards that have been in place as part of Specific Plan 88-1A.

Environmental Impacts – Noise

Comment #39, Page 3.10-29 Mobile (Traffic) Noise

The proposed project's implementation will result in an additional 7,443 average daily trips (ADT) within a fairly compact geographic area. The majority of these trips will utilize the nearby arterials to access the project site, including Gardendale Street and Imperial Highway. Smaller collector and local streets may also be used when these arterials become congested, especially during the morning and evening peak hour traffic periods. It is also important to note that the project traffic will be *new* traffic in that limited traffic volumes are being generated by the current land uses as is pointed out in the Draft EIR.

"Due to the abandoned nature of the Site, existing traffic volumes are limited to nearby residences and commuters traveling to and from the existing commercial properties surrounding the Project Site. Operation of the proposed Project is expected to introduce approximately 3,000 employees from other existing regional County offices commuting to the Project Site. This increase in commuter traffic traveling to and from the Project Site can potentially increase traffic noise within the Project area."

The Draft EIR indicates that the potential increase in traffic noise along Erickson Avenue will be approximately 9.1 dBA, CNEL, which far exceeds the 3 dBA / 5 dBA thresholds. No effort was made to model the potential cut-through traffic using the local streets within the residential neighborhood located adjacent to the project site on the east. This analysis must be provided in the recirculated Draft EIR.

Comment #40, Page 3.10-37 Cumulative Noise Impact Analysis is Flawed

The analysis of cumulative noise impacts is incomplete since the list of related projects is lacking. These additional related projects will translate into potentially significant short-term construction noise and long term mobile noise impacts that are completely ignored in the Draft EIR. At a minimum, the noise analysis must consider the following projects: (1) the Gardendale Station of the West Santa Ana Branch Transit Corridor; (2) Rancho Los Amigos South Campus Sports Center Project; and (3) the City of Downey's Rancho Los Amigos Specific Plan Update. The list of related projects is also missing several critical related projects located adjacent to and in the City of South Gate including the American Legion Site and the Tweedy and Atlantic Site.

Environmental Impacts – Transportation

Comment #41, Impacts are Underestimated

The City of South Gate is very concerned that the Draft EIR understates the proposed project's traffic impacts and completely fails in the identification of effective mitigation. The proposed development is a *regionally significant project* that will directly result in more than 7,443 new daily trips being generated within a relatively compact geographic area. The arterial roadway corridor located in this portion of Los Angeles County, such as Imperial Highway, Firestone Boulevard, and Atlantic Avenue are among the most congested in the region. Of these 7,443 daily trips, 1,038 trips and 884 trips will occur during the morning and evening peak hours, respectively. Even assuming these figures are correct, which we believe is an underestimate since the actual trip rate calculations used the traffic generation data for general office uses as opposed to governmental office uses, the traffic impact on the surrounding community will be life-changing. The recirculated Draft EIR must indicate how the project site can accommodate more than 3,500 employees and more than 7,400 vehicle trips on an average work day.

B5-45

Comment #42, Chapter 3.11 Access to or From Gardendale Street

The City of South Gate is strongly opposed to any access to or from Gardendale Street. The Draft EIR does not adequately or accurately disclose and/or describe ingress/egress to the development. The Lead Agency's representatives, at an initial community meeting indicated that the proposed project's site plan and circulation plan were specifically designed so as to avoid Gardendale Street. At a later meeting, the same representatives indicated that this was not the case. The Draft EIR did not clearly identify access. A review of Figure 7-1, Project Trip Distribution, seems to suggest that 55% of ingress/egress to the project will be from Gardendale Street. This is concerning given the potential impacts to the residential community in the Hollydale area. The City is concerned that this issue may not be adequately described and/or disclosed in the Draft EIR. The City is further concerned that the impacts to said residential neighborhood were not adequately analyzed. Finally, it is unclear what the daily traffic volumes (existing and future) are/will be on Gardendale Street. The traffic study needs to be revised to accurately depict the project's impact on Gardendale Street along with the recirculation of the Draft EIR.

B5-46

Comment #43, Chapter 3.11 Traffic Generation

The project alone will add more than 7,000 ADT to the surrounding streets. This figure does not take into account the potential future development that could occur within the remaining 39-acre area within the Rancho Los Amigos South Campus. The Draft EIR identifies significant impacts to roadway intersections and the respective mitigation measures. As written, the Draft EIR seems to suggest that the mitigation measures are not planned to be implemented/constructed with the project. Instead, the Draft EIR indicates that Los Angeles County shall provide a fair-share contribution towards the installation of the mitigation measures. It states that payment shall be due after approval of the mitigation measures by both the City of Downey and the City of South Gate. For every significant impact treated in this matter the language must be changed to require that Los Angeles County *fully fund* and construct/install the mitigation measures as a part of the project.

B5-47

Comment #44, Chapter 3.11 Mitigation of Impacts

The Draft EIR identified significant traffic impacts to some intersections and does not identify reasonable mitigation measures that could be implemented. For example, a significant morning (AM) peak hour impact was identified at Intersection No. 17 (Arizona Ave/Gardendale Street). The Draft EIR states the following:

“Based on the signal warrant analysis conducted for the proposed Project (see Appendix H), there is insufficient side street volume to warrant the installation of a traffic signal. Consequently, mitigation is considered infeasible due non-compliance with signal warrants which represent legal, social, technological and policy factors. Therefore, absent a reasonable and feasible mitigation measure, the traffic impacts due to the proposed Project would remain *significant and unavoidable* at this intersection.”

B5-48

This approach fails to analyze other mitigation measures that might be feasible. This is not acceptable considering the high volume of traffic trips to be generated by the project. The City is requesting that the Draft EIR include more analysis of traffic impacts deemed *significant and unavoidable* and identify feasible mitigation measures. The County must develop and implement feasible mitigations for all intersections that have a significant impact and these mitigation measures and the responsibility for implementation must be clearly identified in the recirculated Draft EIR.

On a side note, the signal warrant analysis included in Appendix H of the Traffic Study is incorrect. The worksheets are incomplete and it is impossible for the reader to ascertain whether the signal warrant for a particular intersection has been met.

Comment #45, Additional Intersections Should be Analyzed

The Draft EIR indicates that 27 intersections were analyzed in the traffic study. The study should have also included the intersections of Firestone Boulevard/Atlantic Avenue and Firestone Boulevard/Garfield Avenue. These signalized intersections also provide a reasonable connection for access to the project site. It is important to note that the potential 7,000 ADT will be drawn from the surrounding region. In fact, the proposed project is considered to be “regionally significant” under CEQA. Further, it is reasonable to expect that Garfield Avenue and Atlantic Avenue will be utilized to access the site, particularly when the I-710 Freeway becomes congested. Surprisingly, the traffic analysis assumes that very little project-related traffic will use Garfield Avenue. The recirculated Draft EIR must include a trip distribution model that assigns trips to Garfield Avenue and Atlantic Avenue, up to said intersections.

B5-49

Comment #46, Failure to Analyze “Cut-Through” Traffic

The Draft EIR does not identify the proposed project’s neighborhood traffic impacts related to “cut-through traffic” through the residential neighborhood located to the south of Gardendale Street. It is completely implausible to assume that a new development that will generate more than 7,000 ADTs would not result in cut-through traffic, especially during the morning and evening peak hour traffic periods. For example, Figure 7-1, Project Trip Distribution suggests that the project will not produce northbound or southbound trips north of the intersection of Abbot Road and Wright Road (Intersection No. 2). This is not a reasonable assumption, as motorists currently use Wright Road as a cut-through street to circumvent congestion on

B5-50

Atlantic Avenue and access Imperial Highway. Trips must be assigned and the intersection should be re-analyzed. Once again, the recirculated Draft EIR must include a realistic trip distribution model so that a realistic traffic analysis may be undertaken and the requisite mitigation measures identified.

One of the major issues related to the proposed project's trip distribution is the potential traffic impact to Consuelo Street. The Draft EIR is silent on this potential issue. A portion of the proposed project's traffic is likely to be diverted to this roadway via Erickson Avenue during periods of congestion along Imperial Highway. All of this traffic using Consuelo Street will then be forced to make a right turn at Paramount Boulevard and will then be diverted towards Gardendale Street. Consuelo Street is a two lane local street that bisects a residential neighborhood and the connection with Paramount Boulevard is controlled by a stop sign. This potential impact must be analyzed in the recirculated Draft EIR.

Comment #47, Trip Distribution Assumptions are Flawed

Figure 7-1, Project Trip Distribution, suggests that the project will not produce northbound or southbound trips north of the intersection of Garfield Avenue and Garfield Place, or the intersection of Garfield Avenue and Imperial Highway (Intersection No. 5). This is not a reasonable assumption, as Garfield Avenue is the only north/south regional corridor in the City west of the I-710 Freeway. It provides primary access to Imperial Highway; it serves as an alternative to the I-710 Freeway particularly when the freeway is congested; and it also provides access to residential and commercial centers. Trips should be assigned and Intersection No. 5 should be re-analyzed in the recirculated Draft EIR.

Comment #48, Responsibility of Mitigation

The Draft EIR identifies significant impacts to the intersection of Gardendale Street and Erickson Avenue. The mitigation measure proposed is that the intersection be signalized. The Draft EIR indicates that Los Angeles County will provide a fair share of the cost of the mitigation measure to the Cities of Downey and South Gate. This is not a reasonable expectation. In line with a number of previous comments, Los Angeles County should be responsible to *fully fund and implement* the construction and installation of the traffic signal/mitigation measure as part of its project.

Comment #49, Responsibility of Mitigation

The intersection of Garfield Avenue and Monroe Avenue has significant impacts yet no feasible mitigation measure is identified in the Draft EIR. The recirculated Draft EIR should consider a raised landscaped median being installed to minimize turning movements. Further, right turn movements from Garfield Avenue (northbound) to Monroe Avenue (eastbound) shall be restricted during the AM and PM peak hour traffic. Traffic calming measures should be installed on Monroe Avenue (between Garfield and Gardendale), including speed humps.

Comment #50, Gardendale Street Improvements

The Cities of South Gate and Downey partnered in a project under which Gardendale Street was converted to a road diet. The roadway was redesigned to replace four travel lanes with two travel lanes, a dual left-turn lane and two bike lanes. There is now a question whether the road diet design is feasible and whether it can adequately function as such with the proposed project's implementation. As an indicator of that, the

B5-50

B5-51

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B5-54

traffic study identifies significant impacts to intersections on Gardendale and proposes no reasonable mitigation measures at some intersections. This is concerning as Figure 7-1, Project Trip Distribution, assumes that 55% of the project's trips will impact Gardendale Street. The recirculated Draft EIR should further assess whether the road diet is adequate for future traffic conditions. The additional analysis must also consider alternative road designs for discussions with the Cities of South Gate and Downey. The recirculated Draft EIR's analysis must consider any financing requirements of the funding sources that were used to implement the road diet.

B5-54

Comment #51, Chapter 3.11 Traffic Impacts on Gardendale Street

The project will generate a high volume of trips, of which 55% will impact Gardendale Street. Despite that, the Draft EIR does not adequately disclose traffic impacts or mitigation measures for the residential neighborhood to the south, south of Gardendale Avenue between Garfield Avenue and Paramount Street. It is reasonable to assume that when Gardendale is congested, motorists will seek alternative routes and cut-through the residential neighborhood, thereby impacting the streets. The revised traffic analysis in the recirculated Draft EIR needs to analyze the impacts of cut-through traffic within the residential neighborhood located south of Gardendale Street and identify mitigation measures, inclusive of traffic calming treatments.

B5-55

Comment #52, Additional Mitigation

Figure 7-1, Project Trip Distribution, suggests that the project will produce trips thereby producing traffic impacts to the residential neighborhood to the south, south of Gardendale Street on certain streets. The County needs to provide safety improvements on Main Street, Arizona Street, and Industrial Avenue such as traffic calming measures. The County must also be responsible for the funding and implementation of the mitigation to repave the streets as a means to mitigate the impacts of traffic.

B5-56

Comment #53, Imperial Highway/Garfield Avenue Intersection

A 2018 LOS analysis on Imperial Highway at Garfield Avenue resulted in an existing LOS of F for AM and PM peak hours. The intersection must be reanalyzed with realistic trip distribution assumptions. The revised traffic analysis included in the recirculated Draft EIR needs to include requisite mitigation.

B5-57

Comment #54, Related Projects and Cumulative Analysis

The recirculated Draft EIR must include a completed traffic study to address all of the related projects and the cumulative traffic impacts.

B5-58

Comment #55, Chapter 3.11 Transportation

Construction working hours are typically 7:00 am to 3:30 pm. The arrival and departure of construction workers will be the same as with regular commuters. The Draft EIR suggests all construction workers will arrive to the site *prior* to the AM peak hours. This does not appear to be a reasonable assumption. A reanalysis must be included in the recirculated Draft EIR that assumes 100% of the daily trips for the construction workers will arrive during the peak hours.

B5-59

Comment #56, Haul Routes Must Be Identified

As indicated elsewhere in this comment letter, the recirculated Draft EIR and the revised traffic study must identify haul routes within the City of South Gate for the project and disclose impacts and mitigation measures as necessary.

B5-60

Comment #57, Garfield Avenue and Paramount Boulevard

The recirculated Draft EIR must include a left turn phasing analysis at Garfield Avenue and Paramount Boulevard intersection so as to improve coordination on both arterials due to the traffic impacts of the project. The County must be responsible for the funding and implementation of the construction and installation of the traffic signal and mitigation measures.

B5-61

Technical Edits and Other Comments on the Traffic Impact Study (TIS)

Comment #58, Pg. 21, 5.0 Traffic Counts:

A. Since the counts for Erickson Ave/Amigos Ave were collected in August 2018, instead of 2017, the traffic volumes should have been compared with an adjacent study intersection(s) for continuity of flow. A comparison of the entering/exiting volumes on Erickson north of Amigos Ave with those south of Imperial Highway shows that the volumes in August 2018 are significantly lower than the 2017 volumes. This indicates that although school was in session when the 2018 counts were made, traffic was still in the summer/vacation mode. The volumes at Erickson/Amigos should be increased so they are similar to Erickson/Imperial.

B5-62

Comment #59, Page 27, 6.1 Related Projects:

- A. When was the list of Related Projects approved? If in 2017, they should be updated.
- B. 2nd Paragraph – Please note the negative project volumes on Table 6-1 and on Figures 6-2 and 6-3, and discuss why they are negative.
- C. Please provide figures showing the distributions of the Related Projects, in an appendix. The study should be transparent so the analysis can be duplicated by reviewers.
- D. Last sentence – Please change “distribution” to “assignment.”

B5-63

Comment #60, Page 28-30, Table 6-1, Related Projects List and Trip Generation:

- A. Somehow, identify the existing land uses that will be replaced by new ones.
- B. For projects with multiple land uses, including existing land uses being replaced, provide a subtotal of net project trips.
- C. For Project #LC1, which is shown as being under construction, was the existing hospital open and fully occupied/operational when the traffic counts were collected? If so, so note. If the existing hospital was

B5-64

already closed or not fully operational, the existing hospital trips should not be subtracted or only a percentage should be subtracted.

↑ B5-64

Comment #61, Page 36, Table 7-1, Project Trip Generation - Provide justification for the use of the General Office trip generation rates instead of Government Office rates.

A. Generally, the General Office rates result in fewer trips than the Government Office rates, which leads to underestimating project trips.

B. If it's due to there being very few sources for Government Office, then the Single Tenant Office Building use would be more representative. General Office includes a mixture of tenants and tenant services, resulting in lower trip generation rates. Using the fitted curve, the traffic volumes for the Single Tenant Office Building would be:

Daily: 4,983 vpd compared to 7,443 vpd for General Office

AM Peak Hour: 1520 vph vs. 1,038 vph

PM Peak Hour: 1354 vph vs. 884 vph

C. Using the average rates would result in even higher project volumes.

D. Reconsider the trip generation rates. It's more appropriate to use the rates for Single Tenant Office instead of General Office.

B5-65

Comment #62, Page 42, 8.0 Traffic Impact Analysis Methodology, 1st Paragraph:

A. The 2nd sentence states that "the ICU method was used to determine Volume-to-Capacity (v/c) ratios."

B. There appears to be a misunderstanding about the ICU method. The result of the ICU calculations is the ICU value, not v/c. This is different from Circular No. 212 and the Critical Movement Analysis method, where LOS is based upon the intersection v/c.

C. Volume-to-capacity ratios help determine the ICU value, which consists of the sum of the v/c's of the critical movements and the yellow interval (not a v/c), but are not the end result.

D. So, the ICU method was actually used to determine the ICU value and LOS.

E. Interestingly, the ICU worksheets use the correct designations.

F. Please delete the 2nd sentence, or replace it with: The ICU method was used to determine the level of service for signalized intersections.

G. Please correct the last sentence to replace "overall intersection v/c ratio" with "intersection ICU value".

B5-66

Comment #63, Page 43, Table 8-2, City of South Gate, Intersection Impact Operational Threshold Criteria:

A. There should be different impact threshold criteria for signalized and unsignalized intersections since one is based on ICU (percent green time) and the other on HCM (seconds of delay).

B. The ICU methodology is based on percent green time, which is not relevant for unsignalized intersections.

C. An ICU value for an unsignalized intersection is what the intersection capacity would be if the intersection were signalized, making it seem better than it actually is/would be.

D. The County guidelines do not include thresholds for Delay since they were written before the Delay method was included in the HCM.

E. Recommend the City of South Gate use the City of LA's thresholds for Delay, so Table 8-2 would be as follows:

Table 8-2 CITY OF SOUTH GATE INTERSECTION IMPACT OPERATIONAL THRESHOLD CRITERIA					
Final		Level of Service		Project Related Increase in:	
ICU	Delay	ICU	Delay	ICU	Delay
> 0.900	> 55 sec	E or F	E or F	≥ 0.02	≥ 2.5 secs

B5-67

Comment #64, Pages 58, 62 & 63, 10.0 City of South Gate Traffic Analysis

A. Please provide the study intersection number on the ICU worksheets

B. See Comment 5.a. – Please change “v/c” to “ICU” in all sub-sections

B5-68

C. See Comment 6. Intersections 7, 8, 15, 16, 17 and 18 are unsignalized and should not be evaluated with ICU, only HCM. Only show the Delay value – do not show the ICU value.

Comment #65, Pages 59–61, Table 10-1 – See Comment 5:

A. Please change the first line of the title to “Summary of ICU / Delay Values”

B. Please change “V/C” to “ICU” in column titles

B5-69

C. For unsignalized study intersections 7, 8, 15, 16, 17 & 18, delete the two rows of ICU values, provide actual Delay values for LOS F, calculate the change in delay and note whether or not a significant impact based on revised Table 8-2, above.

D. In the NO column, change Intersection 23 to 22.

E. Modify the footnotes to include Delay for unsignalized intersections

F. Bold the ICU/Delay/LOS values that are LOS E or F.

Comment #66, Page 60, Table 10-1, Intersection No. 12, Old River School Road / Imperial Highway – This intersection is included in the City of South Gate traffic analysis, however, the intersection is only noted as being in the City of Downey in the list of study intersections on Page 9. Nor is Old River School Road noted as being in the City of South Gate on Page 12 under Roadway Descriptions.

A. If Intersection No. 12 is not partially in the City of South Gate, please remove it from Table 10-1 and the LOS worksheets in the appendices.

B. If Intersection No. 12 and Old River School Road are partly within the City of South Gate, please so note it in the list of study intersections and for Old River School Road under Roadway Descriptions.

Comment #67, Page 72, 14.2 City of South Gate, 2nd Paragraph, Next to Last Sentence

Another mitigation measure would be to limit side-street movements to right-turns in and out, however, this would require City approval.

Comment #68, Page 76, 15.0 Traffic Signal Warrant Analysis:

A. For Future conditions, including Existing plus Project, also analyze using California Manual on Uniform Traffic Control Devices (CA MUTCD) Figure 4C-103 (CA), Traffic Signal Warrants Worksheet (Average Traffic Estimate Form). This form is used for new intersections and where counts cannot be taken for the analyzed condition, such as for intersections where the actual traffic volumes are unknown and can only be estimated.

B. Signal warrants should also be prepared for each of the analysis scenarios (except mitigation), starting with Existing conditions. If warrants are not met for a given condition, then the next condition is evaluated. If warrants are met for a given condition, then Existing conditions, then no further analysis is required for that intersection. This process makes it clear at which stage a signal is/would be warranted and if a signal would be warranted without the project.

Comment #69, Appendix C, ICU Worksheets for Industrial Avenue – Arizona Ave/Gardendale St:

A. This is a 5-legged intersection, which cannot be analyzed using the current ICU worksheet.

B. And, in trying to make it fit, the traffic volumes for Arizona Ave were left out of the analysis – totally unacceptable.

C. Since this is an unsignalized intersection, it should only be analyzed using the HCM method, anyway. See Comment 6.

Comment #70, The revised and recirculated Draft EIR should add a discussion regarding SB 743, in particular, noting that it is required starting July 1, 2020 and that the study will be updated to include it should the project not be approved by that date.

B5-74

Comment #71, Page 4, 2.2 Existing Project Site

Clarify if existing buildings LACO Nos. 7000 and 1286, which are currently in use, will be demolished.

Comment #72, Page 4, 2.3 Proposed Project Description

Clarify that the "two other buildings" will not be demolished.

Comment #73, Page 5, Figure 2-1, Project Site Plan

Clarify and identify which is the 3rd building that is to remain.

B5-75

Comment #74, Page 8, 3.2 Vehicular Project Site Access

Provide a new figure clearly showing where the existing and future external site access points/roadways are anticipated to be.

Comment #75, Page 9, 4.2 Local Street System

Add a reference to Figure 4-1.

Comment #76, Page 9, Intersection No. 12, Old River School Road / Imperial Highway

See Comment 9.

Comment #77, Page 11, Figure 4-1, Existing Lane Configurations:

A. Please make the following changes to this figure and all figures with the same base map:

B. Extend Atlantic Ave to the north, beyond Abbott Rd.

C. Correct N. Somerset Ranch Rd. and S. Somerset Ranch Rd. to show them extending beyond Garfield Rd to the west and beyond Paramount Blvd. to the east, paralleling the I-105 freeway, with the ramps coming off of these roads instead of directly out of the intersections.

D. It appears that there have been some changes to signals and striping since this figure was prepared. Please modify the figure and related intersection analyses as follows:

E. Intersection 5 – Should the southbound right turn be an overlap?

F. Intersection 8 – The new striping on Imperial Hwy. has a two-way left-turn lane, which counts as a separate westbound left-turn lane.

B5-76

G. Intersection 16, With Project – The new striping on Imperial Hwy. also has parking lanes next to the curb and bike lanes between the parking and travel lanes. Therefore, a defacto right-turn lane should not be assumed. This is the same situation as eastbound at Intersection 17, which does not have a defacto right-turn lane.

Comment #78, Page 12, 1st Paragraph (Wright Road)

Note that it widens out at I-710 SB Off- Ramp/Abbott Rd to provide 2 lanes in each direction north and south of the intersection.

Comment #79, Page 12, Ruchti Road

This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

Comment #80, Page 12, Garfield Place:

A. This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

B. Garfield Place is not posted for 35 mph. It is prima facie 25 mph and not posted.

Comment #81, Page 12, Garfield Avenue

The separate exclusive southbound right-turn lane is provided at Imperial Highway, not Gardendale Street.

Comment #82, Page 12, Old River School Road

See Comment 9.

Comment #83, Page 13, Industrial Avenue

This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

Comment #84, Page 13, Arizona Avenue

This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

Comment #85, Page 14, Paramount Blvd.

Note that it also has a two-way left turn lane.

Comment #86, Page 14, Imperial Highway – Also note that:

A. It also has a two-way left turn lane

B. The intersection of Imperial Hwy and Garfield Avenue is designated as an Enhanced Intersection in the

B5-76

B5-77

City of South Gate's Mobility Element

Comment #87, Page 15, Abbott Road:

A. Abbot Road is designated as a Local Road, not a Collector Street in SouthGate's Mobility Element.

B. Note that it also has a two-way left turn lane.

C. Abbott Road is only posted 35 mph on the I-710 freeway SB offramp, which forms the east leg of the intersection of Abbott Road and Wright Street. Within the City of South Gate, Abbott Road from Wright Street to just east of Atlantic Avenue is prima facie 25 mph and not posted. This is also the section of Abbott Road that's within the study area.

Comment #88, Page 15, Gardendale Street:

A. This street is a Collector Street, not a Secondary Arterial in the City of South Gate Mobility Plan.

B. Also note the two-way left-turn lane and the bike lanes.

Comment #89, Page 16, Monroe Avenue

This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

Comment #90, Page 16, Main Street

Main Street is not posted 35 mph. Main Street, which is within the City of South Gate in the project vicinity, has a prima facie speed limit of 25 mph, which is also posted.

Comment #91, Page 16, N. Somerset Ranch Road:

A. This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

B. Note that it provides access to the I-105 freeway westbound ramps.

Comment #92, Page 16, S. Somerset Ranch Road:

A. This street is designated as a Local Road, not a Collector Street in South Gate's Mobility Element.

B. Note that it provides access to the I-105 freeway eastbound ramps.

Comment #93, Page 42, 8.1 Impact Criteria and Thresholds, 1st Paragraph, last sentence

Please replace "v/c" with "ICU".

Comment #94, Pages 43 & 44, Tables 8-1 through 8-5

Please replace "v/c" with "ICU".

B5-77

Comment #95, Page 72, 14.2 City of South Gate:

- A. 2nd Paragraph, 1st Sentence – Should also include Intersection No. 17.
- B. 2nd Paragraph, Next to Last Sentence – See Comment 10.

Comment #96, Page 76, 15.1 Warrants Input Factors and Data:

- A. Provide Intersection Numbers in addition to intersection names.
- B. First two bullets - When describing the placement of a stop sign, the standard terminology is that stop signs are “on” a street, not “facing an approach”. For instance, the first bullet should be: The Garfield Avenue / Monroe Avenue intersection is currently controlled by stop signs on eastbound and westbound Monroe Avenue.
- C. 3rd bullet – Also note that Garfield is the major street since, by definition, it is a through street.
- D. 4th Bullet – Also note that the side streets “T” into Gardendale Street, which is, by definition, a through street.

Comment #97, Pages 77 – 79, 15.2 Traffic Signal Warrant Analysis

See Comment 11.

Comment #98, Page 79, 15.3 Traffic Signal Warrant Conclusions

Add Intersection Numbers.

Comment #99, Page 83, 16.3 Transit Impact Review

Update as needed, based on final project trip generation (see Comment 4).

Comment #100, Page 86, 17.2.1 Future Cumulative Without Conditions

Add “Project” to the heading.

Comment #101, Page 89, 17.2.2 Future Cumulative Without Conditions:

- A. In the heading, it should be “With” not “Without”.
- B. Also add “Project” to the heading.

Comment #102, Page 90, 18.1 Construction Assumptions, Shoring/Excavation:

- A. Does the City want the trucks hauling materials to operate starting at 7:00 AM or would the City prefer that the activity start after the AM peak period, say 8:30 or 9:00?

B5-77

B5-78

B5-79

B. 2nd Paragraph – Please clarify – so the trucks would exit the site from Erickson Avenue or Old River School Road onto Imperial Highway and not use Gardendale Street or Garfield Avenue?

↑ B5-79

Comment #103, Page 93, 18.3 Transportation Assessment:

A. The construction analysis should also consider the impact on transit and bicycles, as was done in the Transportation section of the DEIR Environmental Analysis (EA) (see DEIR EA Pg. 3.11-25).

B. The conclusion does not match that in the Transportation section of the DEIR Environmental Analysis (see DEIR EA Pg. 3.11-16).

B5-80

C. The construction mitigation measures listed in the Transportation section of the DEIR Environmental Analysis (see Pg. 3.11-16) are not in the traffic impact study.

Comment #104, Appendix C, ICU Worksheets for South Gate:

A. ICU Description – Note that the ICU method is only applicable to signalized intersections and will give a false result if used for unsignalized intersections, showing that the intersection is operating/will operate better than it actually is/would.

B5-81

B. Add Intersection Nos. to the worksheets – See Comment 7.a.

C. Worksheets for Intersection 16 with project – See Comment 20.b.iii.

Technical Comments Regarding the Draft EIR Analysis

Comment #105, Page 3.11-2:

A. 3rd Paragraph, 1st Sentence – Change “Volume-to-Capacity (v/c) ratios” to “the intersection ICU value”. See TIS Comment 5.

B5-82

B. Table 3.11-1 – In the table heading, change “V/C Ratio” to “ICU / V/C Ratio”. See TIS Comment 5.

Comment #106, Page 3.11-4, Table 3.11-3

Change the “Delay or V/C” table heading to “Delay, ICU or V/C”.

B5-83

Comment #107, Page 3.11-11:

A. Under City of South Gate, update as needed, based on the revised traffic impact study. See TIS Comments 5 & 6.

B5-84

B. Paragraph before Section 3.11.4, Last Sentence – For this study, delay was only used at unsignalized intersections. Signalized intersections were evaluated using either the Intersection Capacity Utilization (ICU) method, which calculates the percent green time needed, or the Critical Movement Analysis (CMA), which compares volume to capacity, similar to ICU.

Comment #108, Page 3.11-13

Update as needed based on the revised traffic impact study. See TIS Comment 4.

B5-85

Comment #109, Page 3.11-14, Section 3.11.5:

A. Add Existing conditions to the list.

B5-86

B. Under Future Cumulative without Project Conditions, update the values, as needed, based on the revised traffic impact study. See TIS Comment 2.

Comment #110, Page 3.11-15, Construction and Demolition:

A. 2nd Paragraph – Update the project trips as needed, based on the revised traffic impact study. See TIS Comment 4.

B5-87

B. 2nd Paragraph, Last 2 Sentences – This finding is not consistent with the traffic impact study, which concludes that there would be no additional (beyond project) impacts associated with construction of the project (Page 93 of TIS).

C. 2nd Paragraph, Last Sentence – Should it be “would” or “could”?

Comment #111, Page 3.11-16, Mitigation Measures

These construction mitigation measures are not in the traffic impact study.

B5-88

Comment #112, Page 3.11-16, Operation, Existing with Project, Table 3.11-6:

A. See DEIR EA Comment 2 regarding the column headings.

B. Update the table, as needed, based on the revised traffic impact study.

Comment #113, Page 3.11-19, Signalized Intersection Impacts, 2nd Paragraph

Clarify whether the section about SB 743 is relevant given that the project’s land use is not infill housing or mixed use commercial developments.

B5-89

Comment #114, Page 3.11-20, Table 3.11-7

See DEIR EA Comment 8.

B5-90

Comment #115, Page 3.11-21 – First Paragraph

Since the table is for future cumulative, the sentence should be modified to reflect projected conditions (i.e. replace “currently”). Since the table is several pages long, it would also help to note that it’s for future cumulative without project.

B5-91

Comment #116, Page 3.11-22, Future Cumulative with Project:

A. First Sentence – Add “ICU” and “Delay” to “v/c”.

B. Last Sentence – Insert “ICU values and” in front of “v/c”.

C. Table 3.11-8 – Modify the column headings to match previous references: Use “Future Cumulative without Project” instead of “Future Baseline Conditions” and “Future Cumulative with Project” instead of “Future with Project.”

D. Table 3.11-8 – Change the sub-column headings to add “ICU” to “Delay or V/C.”

B5-92

Comment #117, Page 3.11-25, Transit and Bicycle Facilities, Construction and Demolition

This discussion was not included in the traffic impact study.

Comment #118, Page 3.11-26, 1st Paragraph

Update transit trips, as needed, based on revised TIS.

Comment #119, Page 3.11-27, Table 3.11-9

See DEIR EA Comment 12.

B5-93

Comment #120, Page 3.11-31, 4th Paragraph

Should “LADOT” be a County of Los Angeles reference?

Comment #121, Page 3.11-33, Operation, 1st Paragraph

Update related projects as needed, based on revised traffic impact study (see TIS Comment 2).

Environmental Impacts – Tribal Resources

Comment #122, AB-52 Consultation

The Draft EIR provides confusing and contradicting information regarding the required AB-52 consultation. The Draft EIR stated the following (please note the italicized portions).

B5-94

“Letters were sent via certified mail and email to Mr. Andrew Salas, Chairman of the Kizh Nation; and Mr. Anthony Morales, Chief “of the San Gabriel Band of Mission Indians. The letters included a description of the proposed Project, a map depicting the Project location, and contact information for the County. Recipients were requested to respond within 30 days of receipt of the letter if they wished to engage in consultation per AB 52. *To date, no response has been received from Chief Morales. On August 9, 2017, Chairman Salas replied to the County via email requesting consultation on the proposed Project. On August 15, 2017, the*

County replied to Chairman Salas via email initiating formal government-to government consultation with the Kizh Nation."

It appears from reading subsequent paragraphs outlined in this section of the Draft EIR that the County of Los Angeles does not address the Tribe's "high sensitivity" assessment for the site or the recommended mitigation.

Environmental Impacts – Utilities and Service Systems

Comment #123, Analysis of Cumulative Impacts on Utilities are Required

In regards to the assessment of water consumption and waste water generation impacts for the proposed project, there are shortcomings with respect to the identification of related projects in the immediate area which could result in a significant underestimate of water consumption and effluent generation rates. The recirculated Draft EIR must include an accurate listing of related projects and the attendant cumulative impacts on utilities and service systems.

Alternatives Analysis

Comment #124, Alternative Location is Required

The Draft EIR did not include an alternative calling for an off-site location. Given the potential constraints and many short-comings associated with the South Campus, the analysis in the recirculated Draft EIR must include an *Alternative Location Alternative*. The Draft EIR includes the following statement:

"With respect to other County-owned land, the County has identified no available County-owned land – other than the Rancho Los Amigos South Campus - sufficient to house the ISD Headquarters, Probation Department Headquarters, and County Office facilities in a single area, consistent with the Project aim to consolidate the three facilities into one location."

Unfortunately, the Draft EIR does not indicate whether any surveys or other studies were recently completed as part of the Draft EIR's preparation. For example the County-owned building located on Painter Avenue in Whittier was closed for many years following the 2008 recession. This facility also includes a parking structure across the street. It seems that this building could accommodate a large number staff if it were fully utilized.

Comment #125, Effective and Realistic Alternative Analysis is Required

The alternatives that were ultimately selected (but subsequently eliminated from consideration) were largely designed to reduce demolition impacts on the numerous historic buildings and the one eligible historic district. No convincing alternatives were advanced that would address shade and shadow impacts by increasing building setbacks and reducing the building heights. We have indicated South Gate's concern regarding traffic being diverted onto Gardendale Street and would request a site plan alternative that would restrict access towards Gardendale Street. The alternatives included in the recirculated EIR must be clearly designed to address a potentially significant impact.

B5-94

B5-95

B5-96

B5-97

Comment #126, Page 5-1 Chapter 5 Other CEQA Considerations

The first paragraph must be expanded to clearly indicate that a "Statement of Findings of Overriding Considerations must be made as part of the Final EIR's certification by the Board."

Other CEQA Considerations

Comment #127, Page 5-5 Growth Inducing Impacts

The Draft EIR makes the following statement with respect to growth inducement (please note the italicized portion):

"The Project would develop up to approximately 650,000 square feet of floor area within three buildings (and potentially consolidating two of the buildings). The Project would consolidate existing off-site County uses and relocate existing staff to the Project Site. *Since there are no proposed residential uses and because the relocated staff already have jobs in existing locations, the Project would not contribute to additional growth.* The relocations would allow the County to vacate existing buildings for other uses."

Given that the City of Downey is preparing a Draft EIR for the Rancho Los Amigos Specific Plan, which includes the County project site and areas located adjacent to the project site that would include mixed use, there is a significant likelihood of growth inducing impacts that should be evaluated in the recirculated Draft EIR.

We look forward to your responses to our comments on the Draft DEIR that are outlined in this letter. As stated throughout this letter, we are requesting that the Lead Agency revise the Draft EIR and recirculate the document so that all parties will have an opportunity to fully understand the potential impacts along with any attendant mitigation. The City of South Gate appreciates the opportunity to comment on the Draft EIR. Should you have any questions regarding this letter, please to not hesitate to contact me at (323) 563-9566 or by e-mail at jperez@sogate.org.

Sincerely,



Joe Perez

Community Development Director



B5-98

B5-99

B5-100

Letter C1

November 18, 2019

To: Cliff Stokes

County of Los Angeles Department of Public Works

900 South Fremont, 5th Floor, Alhambra CA 91803

CStokes@dpw.lacounty.gov

Subject: Response to DEIR for Rancho Los Amigos South Campus Project in Downey

SCH Number 2017081017

Long Beach Heritage is deeply concerned about the potential destruction of the Rancho Los Amigos Historic District, which is located in the South Campus in Downey. Although we realize that the County of Los Angeles needs room for expansion and consolidation of the Internal Services and Probation Departments, we hope that the existing buildings within the Rancho Los Amigos Historic District can be restored and adaptively reused as County offices. We respectfully ask that the County of Los Angeles Department of Public Works select Alternative 4: Adaptive Reuse Alternative (ES.6.4) in the Draft Environmental Impact Report, which is the environmentally superior alternative, instead of pursuing the demolition of almost all of the Historic District. The South Campus should be saved because it is the only remaining example of an institution of its type in Southern California.

C1-1

The proposed project, construction of three high rise office buildings and two parking structures, would cause the loss of a significant historic architectural resource in Los Angeles County. Most of the project site has been determined eligible for listing in the National Register of Historic Places and in the California Register of Historic Resources. Construction of the proposed project would remove 57 of the 61 contributing structures and result in the demolition of 94% of the Historic District, which is not an acceptable solution for the reuse of an historic site. Although many of the buildings in the South Campus require moderate to extensive seismic retrofitting and structural upgrades, they can be brought up to current building code standards and adaptively reused.

C1-2

Mitigation measures, such as interpretive photographs, labels, and plaques, can never replace the loss of actual historic fabric in the Historic District. Section 3.4.5 of the Draft Environmental Impact Report states that even with the implementation of the proposed mitigation measures “the impacts to the District would remain significant and unavoidable since the District would no longer exist and there is no feasible mitigation to reduce this impact to less than significant.” It is not sufficient to retain only those buildings eligible for individual listing in the National Register. The significance and integrity of the Rancho Los Amigos Historic District has been well documented in the 2017 Historic Resources Survey and any loss of the resources will compromise the collective character of the site as a whole.

C1-3

The Rancho Los Amigos Historic District meets several criteria that are listed in the National Register (Secretary of the Interior) Standards. These are Criterion A because it is associated with events that contribute to history; Criterion C because it embodies distinctive characteristics of type, period, and construction methods; and Criterion D because it may yield important information about past history. The implementation of the proposed project would also violate CEQA Guideline A, which states that it would cause a substantial adverse change in the significance of an historic architectural resource. Many buildings remaining on the site are excellent examples of Craftsman, brick vernacular, and Spanish Revival styles. Much of the original landscaping also survives.

C1-4

Long Beach Heritage supports Alternative 4: Adaptive Reuse Alternative for the Rancho Los Amigos South Campus project (SCH Number 2017081017). We believe that the contributing structures within the South Campus should be saved and adaptively reused for County offices. We hope that you will choose this green and environmentally superior alternative for this important Historic District.

C1-5

Cheryl Perry, President, Long Beach Heritage

Louise Ivers, Vice President for Advocacy, Long Beach Heritage

Sarah Locke, Executive Director, Long Beach Heritage

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Letter C2



**PASADENA
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November 18, 2019

Cliff Stokes
County of Los Angeles c/o Dept. of Public Works
900 S. Fremont Ave., 5th Floor
Alhambra, CA 91803

Re: Rancho Los Amigos South Campus Project

POSITION: Comprehensive Study of Preservation-Minded Alternatives

To Cliff Stokes,

Pasadena Heritage objects to the proposed redevelopment of the Rancho Los Amigos South Campus, and finds that the Draft Environmental Impact Report (DEIR) prepared by the County's consultant is extremely problematic. We believe that the Rancho Los Amigos campus is a significant cultural resource that conveys an often overlooked and underappreciated narrative of Southern California's and Los Angeles' early history. While we believe that the property can accommodate the County's proposed programmatic use, we can only support a development that utilizes adaptive reuse and preservation of the significant historic resources on this site.

C2-1

We recommend that stronger preservation-focused alternatives be included in the final EIR. The "reduced demolition alternative" and "adaptive reuse/reduced project alternative," as proposed, do little to mitigate impacts on cultural resources.

Many of the buildings slated for demolition are excellent candidates for adaptive reuse due to their condition, flexible floor plans, and ample square footage. It is important to note that the Secretary of the Interior's Standards allow for historic buildings to be modified in order to accommodate new uses (this includes the removal of non-contributing additions, the construction of new additions, and exterior alterations). We ask for the County to take responsibility for the historical resources in its care and think more creatively. The DEIR estimates fairly reasonable construction costs for adaptive reuse, which we believe are equal to or less than that of new construction.

C2-2

Buildings not needed for the County's planned development should be mothballed per established standards. These buildings may be located at the edges of the site, but they could be reused by the County if more space is needed in the future, or for a different program. For examples of how similar property types have been creatively reused, we recommend looking at the Angels Gate Cultural Center in San Pedro, where a community of artists transformed a

C2-3

1940s era Army barracks into an arts hub. If the buildings are adequately mothballed, a leasing opportunity such as this may arise in the future.

↑ C2-3

Without proper mothballing, widespread deterioration and vandalism, including arson, have occurred on the Rancho Los Amigos South Campus. Pasadena Heritage recommends that the County reconstruct the 1915 Harriman Residence (Los Angeles County Building Number 1101), which was illegally entered and set ablaze in June 2017. This Craftsman style building was the former on-site residence of William Ruddy Harriman, Rancho Los Amigos' longest tenured superintendent. Mr. Harriman oversaw nearly half a century of improvements on the campus and helped the original poor farm transition into the long-term healthcare facility that we now know as Rancho Los Amigos. Reconstruction of the home could be carried out as part of a more robust mitigation program than what is currently outlined in the DEIR.

C2-4

We also suggest that closer scrutiny be paid to parking. Traffic is a major and legitimate concern for the residents of Downey and South Gate. During rush hour, vehicular traffic on the 710 and 105 freeways slows to a crawl, and on the local Imperial Highway comes to a standstill. Adding a substantial number of parking spaces will only exacerbate this problem by encouraging more driving to the site, as shown in the DEIR. Yet there is a viable solution that would mitigate impacts on cultural resources, impacts on traffic, and impacts on air quality. The Lakewood Avenue Metro Station is located less than two miles from the project site, or only a five to ten minute drive depending on traffic conditions. A shuttle or vanpool service could be offered to employees of the Rancho Los Amigos South Campus, reducing the parking required, greenhouse gas emissions, and traffic impact simultaneously. This would have a major impact in reducing the scale and cost of the proposed development.

C2-5


We believe that if the County were to base this project on adaptive reuse and new construction that takes the place of non-contributing buildings, it could accommodate all necessary programming on the site. We recommend that Los Angeles County work directly with the Los Angeles Conservancy, the countywide historic preservation nonprofit organization, to come up with viable alternatives that preserve this historic campus while serving the needs of the County. We support the position of the Los Angeles Conservancy on this project, and hope further environmental analysis will address their concerns. Throughout our history as a preservation advocacy organization, we have worked hand in hand with the City of Pasadena, the County of LA, statewide agencies, developers and communities to design projects that served the needs of our community. We would be willing to assist or mediate any discussions that may improve the project. Please reach out to us via phone at 626-441-6333 or via email at smossman@pasadenaheritage.org if you would like to speak further about the project.

C2-6

Sincerely,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director

Letter C3

Cliff Stokes (Consultant)

From: Adrian Fine <afine@laconservancy.org>
Sent: Thursday, November 21, 2019 2:56 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus Project DEIR, SCH Number 2017081017
Attachments: LA Conservancy Comments Rancho Los Amigos South Campus Project DEIR, November 21, 2019.pdf; Exhibits, A, B and C, LA Conservancy Comments on Rancho Los Amigos DEIR, November 21, 2019.pdf; LA Conservancy comments, Rancho Los Amigos South Campus Project follow up (6-27-18).pdf; LA Conservancy comments, Rancho Los Amigos South Campus Project NOP (12-21-2017).pdf; City of South Gate, NOP-Draft Environmental Impact Report - Rancho Los Amigos.pdf

CAUTION: External Email. Proceed Responsibly.

November 21, 2019

Mr. Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803
Email: cstokes@dpw.lacounty.gov

RE: Rancho Los Amigos South Campus Project DEIR, SCH Number 2017081017

Dear Mr. Stokes:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Rancho Los Amigos South Campus Project. Please see attached letter and various attachments, including Exhibits A, B and C, our December 21, 2017 and June 27, 2018 correspondence and NOP comments, and a March 12, 2019 letter from the City of South Gate.

Thank you for the opportunity to comment on the DEIR. We look forward to continuing to work with the County to pursue a preservation alternative as the preferred project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Best, Adrian

Adrian Scott Fine

Director of Advocacy
Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014
(213) 430-4203 | afine@laconservancy.org

Pronouns: He / His / Him / Mr.

Modernist tower and cultural landscape submitted for landmark status by Conservancy! An L.A. Historic-Cultural Monument (HCM) nomination is currently pending for the 1967 Union Bank Square, a 40-story tower designed by A. C. Martin & Associates and landscaped plaza by Garrett Eckbo. <https://www.laconservancy.org/locations/union-bank-square>

November 21, 2019

Mr. Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803
Email: cstokes@dpw.lacounty.gov

RE: Rancho Los Amigos South Campus Project DEIR, SCH Number 2017081017

Dear Mr. Stokes:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Rancho Los Amigos South Campus Project and the proposed demolition of nearly all of the California Register-listed Rancho Los Amigos Historic District (Historic District). We submit these comments in addition to a letter being submitted by our representation, Chatten-Brown, Carstens & Minter LLP.

For over a decade the Conservancy has been working closely with various County representatives in regards to Rancho Los Amigos and its future, with numerous reuse and redevelopment proposals considered. In all cases we have pressed for meaningful retention of the Historic District and repurposing the buildings for new uses. We strongly believe there is a “win-win” scenario available to the County where both preservation and new construction is possible.

During these past ten-plus years, with the County as the steward, the Historic District has been allowed to deteriorate and buildings fall into accelerated disrepair. In recent years contributing buildings within the Historic District have been destroyed due to neglect, vandalism and numerous arson fires. For instance, the 1915 Harriman Residence was destroyed by arson in June, 2017 (Exhibit A). The current deteriorated conditions and neglect which have occurred under the County’s stewardship are now cited as a health and safety concern and justification for the proposed undertaking, including nearly wholesale demolition of the Historic District (Exhibit B).

In recent meetings with the County and included in the DEIR is a concern about ongoing security and maintenance costs with overseeing the existing facility. This has been stated as unsustainable and an ongoing concern by the County, and entered as justification for the nearly wholesale demolition of the Historic District as part of this project. While we have visited the site and witnessed the deteriorated conditions, there is no analysis provided in the DEIR that substantiates that buildings are beyond repair or reuse and therefore must be demolished. Further, no

C3-2

C3-3



recent analysis is provided that substantiates how such infeasibility was ascertained. The lack of condition and feasibility analysis are core deficiencies in the DEIR.

^ C3-3

Nevertheless, the Historic District has been left unsecured, as stated in the DEIR, which has directly lead to the loss and destruction of some of the contributing historic resources, as referenced above in our comments. Just this week, on November 20, the Conservancy visited the site and found numerous, large holes in fencing allowing anyone to easily enter the site, inhabit buildings, and cause damage (Exhibit C). We are concerned about additional destruction of the Historic District while this project is being considered. The County is prohibited from neglecting these historic resources.¹ How is the County currently maintaining and securing the Historic District?

C3-4

In December, 2017 the Conservancy provided comments (attached) on the Notice of Preparation (NOP) for the Rancho Los Amigos South Campus Project. Then and now we cited the significance and rarity of this historic resource, and our concern about the County's approach to demolition of nearly all of the Historic District despite the proposed project impacting only 35 (at that time, 28 acres) of the total 74 acres. We raised various questions within our NOP comments and request that these be addressed as part of our overall comments submitted through the DEIR.

C3-5

In June, 2018 the Conservancy submitted additional comments (attached) to the County following a meeting and site visit of Rancho Los Amigos, including providing seven examples of other similar historic campus facilities that demonstrate how preservation and reuse is an economically viable approach. Again, we encourage the County to seriously consider a similar approach that can meet Project Objectives while also maintaining the eligibility of the Historic District.

The Conservancy's strong concerns over the proposed nearly wholesale demolition of this irreplaceable Historic District are only heightened by the County's continued direction despite our past comments. The problematic DEIR attempts to circumvent CEQA by including what should properly be evaluated as a separate project—the proposal to demolish structures outside the identified Development Area, and fails to evaluate a thorough range of potentially feasible preservation alternatives.

C3-6

Rancho Los Amigos is highly significant to the heritage of all of Los Angeles County and the Conservancy and our many supporters strongly believe that a modified Alternative 4 pairing sensitive new construction with the adaptive reuse of select district contributors can retain the Historic District, feasibly meet most of the County's Project Objectives, and become a "win-win" strategy for repurposing and reactivating the long-neglected South Campus.

C3-7

I. Proposed Project Poses Impacts to Cultural Resources

The Historic District was determined eligible for listing in the National Register of Historic Places by a consensus through a Section 106 process in 1995 and subsequently listed in the California Register of Historical Resources in 1998.

The Historic District was deemed significant under Criterion A of the National Register for its association with turn-of-the-century health care in Los Angeles County's indigent population, and for its later treatment of those in Los Angeles County with chronic illnesses, both mental and physical.

The Historic District contains a mix of buildings that housed both staff and patients, and a range of supporting services that collectively chart Rancho Los Amigos' transformation from a Poor Farm and

C3-8

¹ Los Angeles County Code 22.14.080 - H



rehabilitative care facility into a hospital to house long-term invalid patients. Additionally, the site plan and placement of the various structures, often grouped by particular uses, reflects the operation of the facility and the relationships the individual structures and their uses had with one another.

The Historic District was re-evaluated in 2018 as part of the project's environmental review. The evaluation noted recent changes in the status of some structures while extending the Historic District's boundaries at the southeast portion of the campus.

The updated evaluation reaffirms the continued eligibility of the Historic District as a historic resource listed in the California Register of Historical Resources. The re-evaluated Historic District contains 109 features, comprised of 61 contributors and 48 non-contributors. The contributors have been further classified into the following categories: 23 primary contributors, 17 secondary contributors and 21 tertiary contributors.

As proposed, the Rancho Los Amigos South Campus Project would demolish 105 buildings and structures—an unavoidable, significant impact that would eliminate the Historic District. The project would retain just four contributors: the 1926 Administration Staff building and the 1930 Casa Consuelo patient ward, with no plans for their reuse; the 1913 water tower; and a Moreton Bay fig tree.

The County's proposed project seeks to develop facilities on the Rancho Los Amigos South Campus to accommodate the Internal Services Department (ISD) Headquarters, Probation Department Headquarters, and a County Office Building. The project would consolidate in one location approximately 3,000 County-budgeted positions that are currently at other existing County facilities.

The proposed new facilities would consist of a six-story ISD and Probation Department Headquarters, housed either in separate buildings or combined in one structure, and a five-story County Office Building, collectively totaling 650,000 square feet. Additionally, two parking structures collectively totaling 953,750 square feet would be constructed. A three-story parking structure would serve the County Office Building, while a nine-story structure would serve the ISD and Probation Department Headquarters.

The DEIR states "the full build-out of the proposed Project would encompass up to 650,000 square feet of developed floor area within the approximately 35-acre Development Area portion of the larger 74-acre Project Site."

Regarding the treatment of the rest of the South Campus beyond the 35-acre Development Area, the DEIR states "Following demolition of the buildings and structures on the remainder of the Project Site, the Site would be graded with irrigation installed, and hydroseeded with a native seed mix, and would remain open until such time future development may be proposed, if it is approved."²

II. County's inclusion of demolition-only component outside Project's Development Area circumvents CEQA, eliminates consideration of potentially feasible alternatives linked to that action

A significant flaw of the DEIR is its inclusion of a demolition-only component outside the Project's Development Area, which circumvents CEQA and eliminates consideration of potentially feasible alternatives linked to that action.

² Rancho Los Amigos South Campus Project, DEIR, ES-2



The County defines the Rancho Los Amigos South Campus project as the construction of “three new County administrative buildings within a 35-acre Development Area on the 74-acre Project Site.” Simultaneously the project is also calling for the demolition of “existing buildings, hardscape and some landscape features” throughout the larger Project Site.

The County appears to be inserting a secondary proposal, to clear the South Campus of structures outside the identified Development Area, under the guise of meeting Project Objectives focused on eliminating public safety concerns associated with the existing abandoned campus setting. Yet demolition is not the sole option for eliminating the aforementioned public safety concerns.

The direction the County is taking is sidestepping and precluding the required full consideration of preservation alternatives to its demolition-only subproject that would result in the loss of numerous structures not otherwise impacted by the proposed new construction. The Conservancy outlined this central concern of ours in our previous NOP comments and requests an explanation as to why the County is pursuing this project in this manner and how this complies with CEQA?

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.³

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.⁴ A separate environmental review with its own evaluation of alternatives should be prepared when future uses are identified and proposed for other portions of the South Campus and Rancho Los Amigos Historic District.

III. DEIR identifies alternatives that retain the Historic District while achieving most Project Objectives

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.”⁵ 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.”⁶ 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.⁷ Reasonable alternatives must be considered “even if they substantially impede

³ Imperial Highway Relocation Feasibility Analysis, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.

⁴ Orinda Assn. v. Board of Supervisors (1986) 182 Cal.App.3d 1145, 1171.

⁵ Public Resource Code, Sec. 21001 (b), (c).

⁶ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

⁷ Guideline § 15126.6(a).

C3-10

C3-11



the project or are more costly.”⁸ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁹

The DEIR identifies twelve Project Objectives which can be roughly categorized into five main areas: provide consolidated facilities for the ISD and Probation Department headquarters on the South Campus; develop County facilities that both meet current seismic performance standards and strive for sustainability; utilize existing County-owned property and enable the reuse of the South Campus to complement potential future projects in vicinity; recognize the history of Rancho Los Amigos by promoting historic preservation of buildings on the South Campus; eliminate public health and safety concerns and provide for new County facilities in a safe environment.

The Draft EIR contains two alternatives that would enable the project to retain the National Register-eligibility of the Rancho Los Amigos Historic District: Alternative 2, the Partial Preservation Alternative, Scenario 1; and Alternative 4, the Adaptive Reuse/Reduced Project Alternative, which was identified as the Environmentally Superior Alternative.

Both Alternative 2, Scenario 1 and Alternative 4 would retain all 23 primary and 17 secondary historic district contributors, while demolishing all 21 tertiary contributors and all 48 non-contributors. Alternative 2, Scenario 1 would construct new facilities along Laurel Street and Aliso Avenue for the County while mothballing all retained historic district contributors. Alternative 4 does not include new construction but would select 12 of the larger historic district contributors, primarily along Erickson Avenue, to be adaptively reused to house a portion of the County’s employees called for in the proposed project.

The Draft EIR’s limited analysis of Alternative 4 concludes it “would meet a portion of the identified Project Objectives, but to a lesser extent than the proposed Project” and does not reject the alternative as infeasible. In fact, alternative 4 appears capable of meeting nearly all of the Project Objectives fully or partially, with the exception of the objective that specifically links the project’s sustainability goals to “all new buildings.” The adaptive reuse of historic structures will of course aid in the County’s desire to pursue an environmentally sustainable project and augment efforts to achieve LEED certification. And the ability to eliminate public health and safety concerns on the campus and provide a safe environment is not contingent upon the demolition of vacant structures and can be achieved in other ways.

IV. Final EIR should evaluate a modified version of Alternative 4 that includes new construction

The opportunity exists to modify Alternative 4 by pairing new construction with the current adaptive reuse proposal, which would yield a preservation-based alternative capable of meeting, either fully or partially, all of the Project Objectives.

The Conservancy questions why a preservation alternative pairing new construction with the retention and reuse of a portion of the Historic District’s buildings was not evaluated? We specifically addressed this point in our June 27, 2018 comments following our meeting and site visit. Again, we discussed this with the County at a meeting on November 14. We strongly believe an alternative of this type holds great promise in meeting Project Objectives while retaining and reusing a meaningful portion of the existing

⁸ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁹ Public Resources Code § 21081.5.

C3-11

C3-12



Historic District. We strongly encourage the County to seriously consider this type of approach as a preferred project.

Such an alternative could include new construction along Erickson Avenue directly across from the District contributors proposed for adaptive reuse, or at the locations on Aliso Avenue or Laurel Street proposed for new construction in Alternative 2. Additionally, the large triangle of open space west of Laurel Street should also be assessed as a location for new construction, as it contains one of the largest segments of contiguous open space on the South Campus and lies outside the boundary of the historic district.

C3-12

V. Relationship between County's environmental review and City of Downey's Specific Plan environmental review should be better coordinated

Both the County and the City of Downey are currently pursuing independent but seemingly related Environmental Impact Reports for this project site; the proposed project by the County and the "Rancho Los Amigos South Campus Specific Plan" by the City of Downey. There does not seem to be coordination between the two.

C3-13

In a March 12, 2019 letter responding to the City's NOP, the City of South Gate has suggested there is CEQA project splitting and piecemeal consideration of the Downey and County projects (attached). Given that a Specific Plan may limit a range of reuse and redevelopment options for the future, why is this not being considered by the County's Rancho Los Amigos South Campus Project DEIR? Why are the City of Downey and the County not coordinating these two related undertakings?

About the Los Angeles Conservancy:

The Los Angeles the Conservancy has the largest membership of any local preservation organization in the U.S., 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.

C3-14

Thank you for the opportunity to comment on the DEIR for the Rancho Los Amigos South Campus Project. We look forward to continuing to work with the County to pursue a preservation alternative as the preferred project. 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

Adrian Scott Fine
Director of Advocacy

Attachment(s)

cc: Los Angeles County Supervisor Janice Hahn, District 4
City of Downey
Downey Conservancy
Chatten-Brown, Carstens & Minter, LLC



**Exhibit A: Before and after, arson fire of 1915 Harriman Residence,
Rancho Los Amigos**



1915 Harriman Residence, as photographed in 2012 by Los Angeles Conservancy



1915 Harriman Residence, following arson fire, as photographed in 2018 by Los Angeles Conservancy



Exhibit B: Mapping of proposed demolition of Historic District

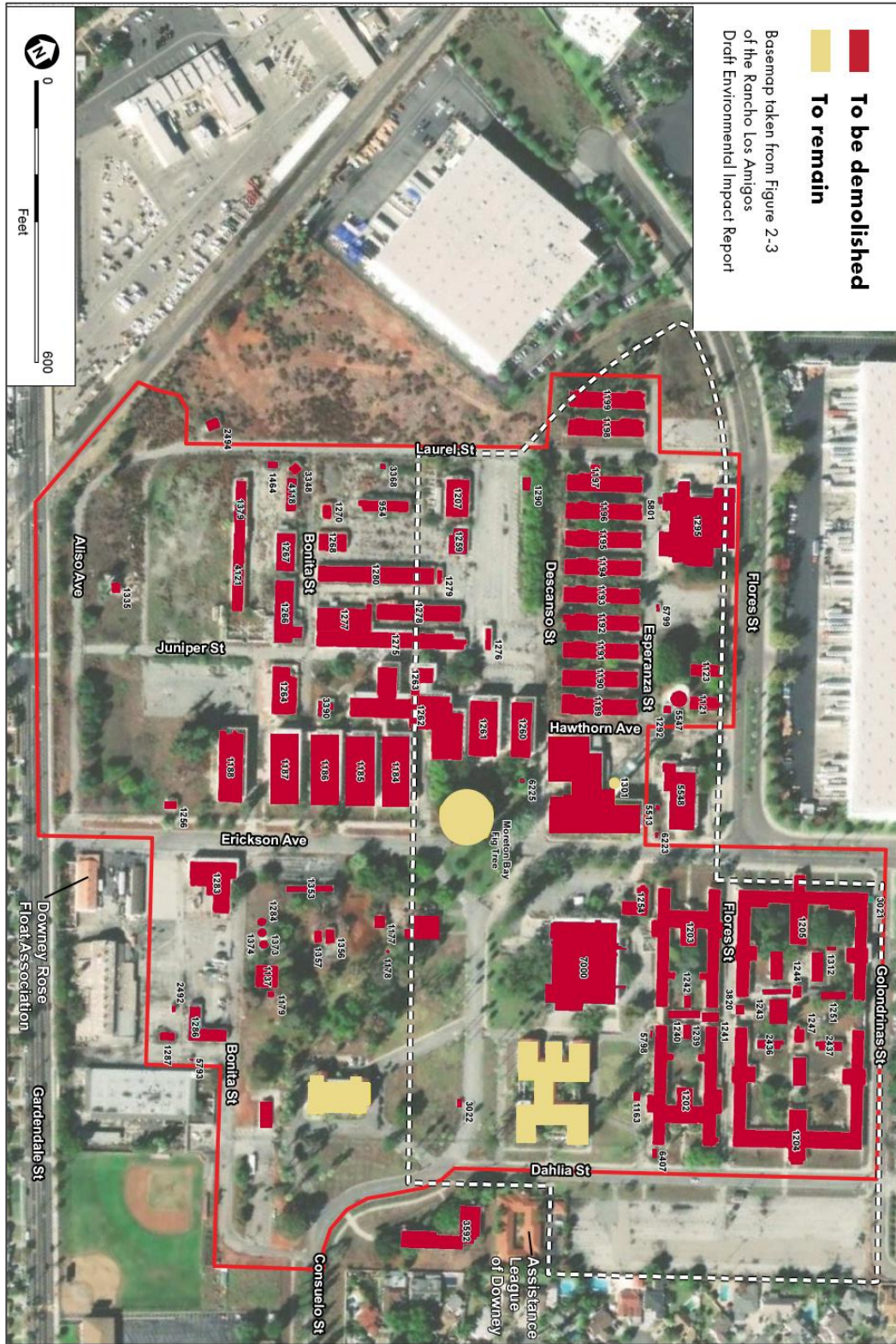


Exhibit C: Various points of entry and lack of security. Rancho Los Amigos, as photographed by Los Angeles Conservancy on November 20, 2019















June 27, 2018

Ms. Hannah Chen, Capital Programs
County of Los Angeles, Chief Executive Office
500 W. Temple Street, Room 754
Los Angeles, CA 90012
Email: hchen@ceo.lacounty.gov

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

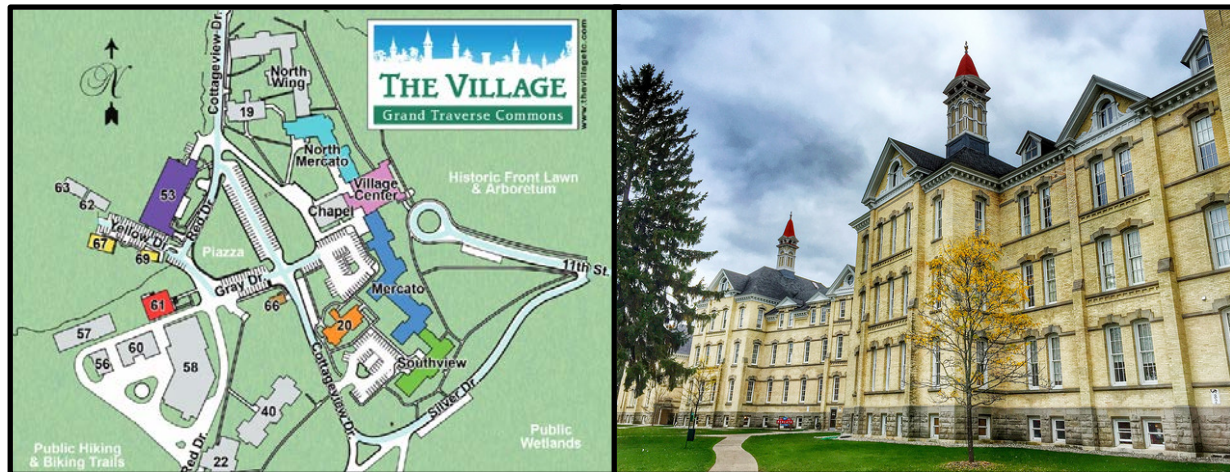


Waterbury State Office Complex, Waterbury, Vermont

- 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-lead-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/>



December 21, 2017

Mr. Luis Ramirez
Capital Projects Program Manager
County of Los Angeles Dept. of Public Works
Project Management Division II
900 S. Fremont Avenue, 5th Floor
Alhambra, CA 91803
Email: luramire@dpw.lacounty.gov

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
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laconservancy.org

RE: Rancho Los Amigos South Campus Project NOP

Dear Mr. Ramirez:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Rancho Los Amigos South Campus Project and the proposed demolition of the entire California Register-listed Rancho Los Amigos Historic District. Given the rarity and historical significance of this resource, we are deeply disappointed in the County's current direction, especially as we have worked previously with the County throughout the past ten years to identify ways to repurpose this campus. The Conservancy and our many supporters are strongly concerned about the loss of this important community asset. Rancho Los Amigos has long been on the Conservancy's radar and we consider it highly significant to the heritage of all of Los Angeles County.

With wholesale demolition proposed, a significant adverse impact will occur; therefore the County will need to consider potentially feasible alternatives to demolition. As required by the California Environmental Quality Act (CEQA), the Draft Environmental Impact Report (EIR) shall fully consider and include a range (more than one) of preservation alternatives that could accomplish the goals of the project while retaining the continued eligibility of the historic district.

I. Historical Significance of Rancho Los Amigos

The South Campus of Rancho Los Amigos contains the Rancho Los Amigos Historic District (historic district), which was determined eligible for listing in the National Register of Historic Places by a consensus through the Section 106 process in 1995 and subsequently listed in the California Register of Historical Resources in 1998.¹

The historic district was deemed significant under Criterion A of the National Register for its association with turn-of-the-century health care in Los Angeles County's indigent population, and for its later treatment of those in Los Angeles County with chronic illnesses, both mental and physical.

¹ County of Los Angeles Data Center, Draft EIR. April 2010. Section 3.4-10.



The historic district contains a mix of buildings that housed both staff and patients, and a range of supporting services that collectively chart Rancho Los Amigos' transformation from a Poor Farm and rehabilitative care facility into a hospital to house long-term invalid patients. Additionally, the site plan and placement of the various structures, often grouped by particular uses, reflects the operation of the facility and the relationships the individual structures and their uses had with one another.

Of the 103 buildings, structures and features identified in the district at the time of the determination, 78 were determined to be district contributors. In 1998, the 78 buildings, structures and a Moreton Bay fig tree were automatically listed in the California Register. Additionally, Rancho Los Amigos is one of the six historical resources recognized in [Downey Vision 2025](#), the City of Downey's General Plan, as being a significant historical resource. The Design Element of the General Plan contains a policy dedicated to preserving the city's cultural resources, calling for specific efforts such as:

- Program 8.4.2.3: Promote the preservation and restoration of older structures, and
- Program 8.4.2.4: Encourage adaptive re-use of older structures

In recent years and as part of previous projects proposed by the County of Los Angeles, the campus has been repeatedly evaluated and determined to retain eligibility as a historic district. In April 2010, an updated historic resource evaluation of the historic district prepared for the County of Los Angeles Data Center project draft EIR concluded that, of the 78 original district contributors, 72 remained extant with 68 retaining sufficient integrity to continue contributing to the historic district.

II. Project Description, Purpose and Need

According to the NOP, the project proposes to develop three new County administrative buildings and a parking structure in a 28-acre Development Area within the overall 74-acre South Campus. Although the proposed new construction is limited to the 28-acre Development Area, the entire South Campus has been identified as the "Project Site."

The project description cites a total square footage of up to approximately 650,000 square feet of office space in new construction comprised of new facilities to house Internal Services Department (ISD) Headquarters, Probation Department Headquarters, and a Sheriff's Department Crime Laboratory. These spaces are to be filled by approximately 3,000 County-budgeted positions that are currently at other existing County facilities location within the region. A stated goal of the project is to achieve the Leadership in Energy and Environmental Design (LEED) gold rating or better.

To make room for the new construction, the project is proposing the demolition of all 51 existing buildings and structures within the 28-acre Development Area. The NOP also contemplates the demolition of some or all of the remaining structures of the South Campus, even though no further construction is being proposed and evaluated in the current environmental review.

Several questions have arisen as we attempt to understand the cumulative scope of the County's long range plans for the South Campus and the proposed, wholesale destruction of the California Register-listed historic district.

The Conservancy has previously worked closely with the County in our review of several past project proposals for the South Campus at Rancho Los Amigos, including the Data Center Project in 2010-13 and the Rancho Los Amigos South Campus Sports Center in 2016. Discussion of ways to retain contributing resources within the historic district factored into both conversations, so we're very surprised at the direction the County is currently taking by proposing the complete demolition of the historic district.



While we understand the County's goal of consolidating particular administrative offices to the Rancho Los Amigos property and have reviewed the program summary and formulas for establishing the desired square footage for each headquarters in the "Imperial Highway Relocation Feasibility Analysis," we question the need for the desired square footage and suggested footprints to house staff in large-scale structures. Given the County's responsibility, per CEQA, to reduce project impacts to historic resources when possible, we ask why a creative approach that could provide the desired square footage through the adaptive reuse of numerous small-scale structures is not being considered. Such a creative approach is not without precedent and it could both revitalize long vacant historic structures while advancing the project's goal of achieving a LEED gold rating.

III. Project cannot be subdivided into small sub-projects to eliminate potentially feasible alternatives from consideration

The proposed project impacts the historic resource which is the California Register historic district, which comprises the majority of the 74-acre South Campus. Why is the County instead identifying and primarily focusing on a sub-project area, in this case a 28-acre Development Area? The boundaries for this sub-area appear to be arbitrary and include a portion but not all of the historic district resources, in this case 51 structures. Why is the County not looking at the entire 74-acre South Campus as the project scope, and as an effort to consider alternatives and avoid impacts to historic resources? This is curious given other parts of the campus might be better positioned and capable of meeting the County's needs, where open space currently exists and could allow for larger building footprints of new construction while avoiding historic buildings.

If the project presented in this NOP is part of a larger, multi-phase development effort that the County is anticipating for the South Campus, why is the County attempting to circumvent the CEQA process through project splitting? This larger phased project is clearly contemplated in the Imperial Highway Relocation Feasibility Analysis (Feasibility Analysis), dated August 2015 and developed for the County by Gensler. Our understanding is this report came about through a motion in 2014 by Supervisor Knabe, instructing the County to "complete a 90-day Feasibility Analysis and Preliminary space plan for the relocation of County Departments located in the facilities at 9150 & 9300 E. Imperial Highway in Downey, CA."²

The consultant apparently did not fully factor in historic resources as the report does not contemplate or understand the mandate under CEQA as it states, "this report find[s] no significant obstacles to relocating Internal Services Headquarters and the Probation Headquarters to the Rancho Los Amigos South Campus in Downey." In part, this may be due to Gensler's recommendation to the County to adaptively reuse some of the historic buildings, a direction the County is apparently now disregarding. In August of 2016 the County authorized the Rancho Los Amigos South Campus Project to move forward and award a consultant agreement. Has an updated version of the August 2015 Feasibility Analysis, or a new study, been completed for the County?

While it appears that the Feasibility Analysis did not specifically evaluate whether historic district contributors might be adaptively reused for any of the new facilities being proposed in the NOP, the Gensler study notably does suggest that "several of the buildings may feasibly be converted to office use to reduce the amount of new construction needed" and that such a feasibility analysis "will require a more

² *Imperial Highway Relocation Feasibility Analysis*, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.



detailed programming effort to fully assess.”³ The County, as lead agency, is required to evaluate alternatives that could reduce project impacts to a less than significant level where possible and should prioritize the preparation of this analysis. The consultant further recommends “renovating approximately 240,247 GSF of the existing buildings to be used as adaptive reuse amenity spaces for the planned development.”⁴

Under CEQA Guidelines Section 15378, a “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.⁵

Accordingly, a public agency cannot segment a single project into smaller individual sub-projects in order to avoid reviewing the impacts of the project as a whole, or to eliminate potentially feasible alternatives from consideration.⁶ The draft EIR must acknowledge whether future phases of development are indeed anticipated for the South Campus. If that is the case, and the County is not yet ready to proceed with the evaluation of project proposals for other portions of the South Campus, then the Specific Plan which the County and the City of Downey have jointly commenced should evaluate all of the 74-acre campus along with the anticipated project phases so impacts to the entire historic district can be considered from the outset.

IV. Draft EIR Must Evaluate a Range of Potentially Feasible Preservation Alternatives

A key policy under 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.”⁷ 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.”⁸

Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁹ Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”¹⁰ The lead agency cannot

³ *Imperial Highway Relocation Feasibility Analysis*, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.

⁴ *Imperial Highway Relocation Feasibility Analysis*, Executive Report, C. Project Scope. August, 2015. Los Angeles County Department of County Works.

⁵ *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.

⁶ *Orinda Assn. v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.

⁷ Public Resource Code, Sec. 21001 (b), (c).

⁸ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.

⁹ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

¹⁰ Public Resource Code, Sec. 21002.1.



merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.¹¹

In the past the County has committed itself to the review of preservation alternatives for previous projects proposed for the South Campus of Rancho Los Amigos, and the environmental review of this current proposed project should be no different. There is precedent for the successful adaptive reuse of buildings comprising historic campuses, such as the Presidio in San Francisco's Golden Gate Park.

The South Campus Conceptual Site Plan included in the Feasibility Analysis locates the proposed ISD Headquarters, Probation Department Headquarters, and parking structure serving both buildings in the southwest portion of the campus in what is referred to as Development Site C. Development Site C currently contains a number of non-contributors to the historic district and far fewer contributing structures than the Development Area proposed as the project site in the NOP. Additionally, the same feasibility analysis contains suggestions for creative adaptive reuse of the historic structures in the historic district, including: a visitor/historic center, a fitness center, a café/coffee house, a dining hall, a daycare facility, a farmers market, a conference center, and even a dry cleaners and a pharmacy.

About the Los Angeles Conservancy:

The Los Angeles the Conservancy has the largest membership of any local preservation organization in the U.S., 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.

Thank you for the opportunity to comment on the NOP for the Rancho Los Amigos South Campus Project. We would like to meet with the County soon before the draft EIR is out to discuss further. 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

Enclosure

cc: Los Angeles County Supervisor Janice Hahn, District 4
City of Downey
Downey Conservancy

¹¹ Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



4. LSA Associates, Inc. December 2000. *Cultural Resource Assessment for AT&T Fixed Wireless Services Facility Number LA_106_a, County of Los Angeles, California*. Prepared for: AT&T Fixed Wireless Services.
5. LSA Associates, Inc. December 2000. *Review of AT&T Fixed Wireless Services Facility Number LA_106_a, County of Los Angeles, California* (Letter to the California Office of Historic Preservation, Sacramento, CA).
6. LSA Associates, Inc. August 2000. *Cultural Resources Assessment for Pacific Bell Wireless Facility LA 285-03, County of Los Angeles, California*. Prepared for: Pacific Bell Wireless.
7. Mason, Roger. May 2001. *LA-5960: Cultural Resources Records Search and Literature Review Report for an American Tower Corporation Telecommunications Facility: Number LA_009_n1, Redondo, in the City of South Gate, Los Angeles, California*. On file at South Central Coastal Information Center, California State University, Fullerton.

3.4.2.3 Historical Resources

The proposed project site is located within the boundaries of the Rancho Los Amigos Historic District (Historic District) (Figure 3.4.2.3-1, *Rancho Los Amigos Historic District*). This determination was the result of a records search for the proposed project area conducted at the SCCIC, which included relevant data from the HRI database,²⁶ historical research, and consultation with the Office of Historic Preservation (OHP), which revealed that two previously prepared historic survey reports documented the Historic District.^{27,28}

In 1995, the Rancho Los Amigos Historic District was determined eligible for inclusion in the NRHP under Criterion A (an association with events that have made a significant contribution to the broad patterns of history) for “its association with the turn-of-the century health care of Los Angeles County’s indigent population and for its later treatment of those in Los Angeles County with chronic illnesses, both mental and physical.”²⁹ The period of significance for the Historic District was determined to be 1888 to 1945.³⁰ Of the 103 buildings, structures, and features identified in the district at the time of the determination, 78 were determined to be district contributors.³¹ In 1998, the 78 buildings, structures, and a Moreton Bay fig tree were automatically listed in the CRHR.

Of the 78 contributors that were identified within the Historic District, 72 are still extant and 68 have been determined to retain sufficient integrity to continue to contribute to the Historic District. One of the contributors, Patient Ward / Building 211 (LACO No. 1199), has been previously approved for demolition under a related project, Link Road, as part of the Rancho Business Center Specific Plan 88-1 (SP 88-1). Seventeen (17) of the Historic District contributing features are located

²⁶ California Historic Resources Inventory Database, Los Angeles County. 2009. On file at: Sapphos Environmental, Inc., Pasadena, CA.

²⁷ McAvoy, C. July 1995. *Survey of Earthquake Damaged Properties for Purposes of Section 106 Review, Determination of Eligibility*. Prepared by: Historic Resources Group. On file at the Office of Historic Preservation, Sacramento, CA.

²⁸ Post/Hazeltine Associates. October 2003. *Intensive Historic Structures/Sites Survey for the South Campus of Rancho Los Amigos Rehabilitation Center, Los Angeles County, California*. Prepared for: County of Los Angeles. The Historic District was assessed for historic significance twice, first in 1995 and later in 2004. The 1995 study determined the Historic District to be eligible for listing as a historic district in the NRHP, and as a result, the Historic District was listed in the CRHR when regulations implementing the CRHR were adopted in 1998. The subsequent 2004 study limited eligibility to six individual buildings and complexes; however, the 1995 finding was a formal, consensus-based determination of eligibility, and takes precedence over the 2004 survey.

²⁹ Historic Resources Group. 26 July 1995. Primary Record and District Record: Rancho Los Amigos Medical Center. Submitted to: Office of Historic Preservation, Department of Parks and Recreation, Sacramento, CA.

³⁰ Historic Resources Group. 26 July 1995. Primary Record and District Record: Rancho Los Amigos Medical Center. Submitted to: Office of Historic Preservation, Department of Parks and Recreation, Sacramento, CA.

³¹ The 1995 survey identifies the Smoke Stack (with no LACO No.) as a separate individual resource. The 2004 and 2007 surveys lists the Power Plant and Smoke Stack as a single resource with one LACO number (1300). This difference results in a discrepancy of one in the total number of buildings within the Historic District.

on the proposed project site. Table 3.4.2.3-1, *Rancho Los Amigos Historic District Contributors*, lists the individual contributors to the Rancho Los Amigos Historic District identified in the 1995 Determination of Eligibility.

**TABLE 3.4.2.3-1
RANCHO LOS AMIGOS HISTORIC DISTRICT CONTRIBUTORS**

LACO No.	Name/Description	Year Constructed ¹	Relation to Proposed Project Site
N/A	Moreton Bay fig tree	Circa 1890 (planted)	Outside
954	Lumber Shed	1942	Outside
1100	Administration Building / Office of Public Safety	1926	Outside
1101	Superintendent's House / Harriman House	1915	Outside
1121	Staff Cottage	1921	Inside
1123	Staff Cottage	1924	Inside
1137	Dairyman's House	1907	Outside
1177	Superintendent's Garage	1917	Outside
1179	Dairyman's Garage	1926	Outside
1184	General Ward 30	1913	Outside
1185	General Ward 40	1913	Outside
1186	General Ward 50	1916	Outside
1187	General Ward 60	1926	Outside
1188	General Ward 70	1928	Outside
1189	Patient Ward 201	1923	Inside
1190	Patient Ward 202	1923	Inside
1191	Patient Ward 203	1923	Inside
1192	Patient Ward 204	1923	Inside
1193	Patient Ward 205	1926	Inside
1194	Patient Ward 206	1926	Inside
1195	Patient Ward 207	1926	Inside
1196	Patient Ward 208	1928	Inside
1197	Patient Ward 209	1928	Inside
1198	Patient Ward 210	1928	Inside
1199	Patient Ward 211	1928	Inside; previously approved for demolition as part of SP 88-1
1202/1203	Women's Psychiatric Wards	1919-1924	Outside
1204/1205	Men's Psychiatric Wards	1907-1924	Outside
1207	Work Preparation Center No. 2	1925	Outside
1238	Casa Consuelo	1930	Outside
1239	Toilet Building	1930	Outside
1240	Shelter	1930	Outside
1241	Linen Room	1932	Outside
1243	Open Shelter	1916	Outside
1244	Toilet Room	1916	Outside
1245	Linen Room / Snack Bar No. 3	1932	Outside
1247	Toilet Building	1925	Outside
1251	Open Shelter	1916	Outside
1254	Chapel / Computer Center	1908	Outside
1256	Toilet Building	1925	Outside
1259	Wheelchair Repair	1932	Outside

**TABLE 3.4.2.3-1
RANCHO LOS AMIGOS HISTORIC DISTRICT CONTRIBUTORS, Continued**

LACO No.	Name/Description	Year Constructed ¹	Relation to Proposed Project Site
1260	Bathhouse and Ward	1922	Outside
1261	Auditorium	1928	Outside
1262	Dining Room, Kitchen, Staff Room	1913-1926	Outside
1263	Commissary and Receiving Room	1913-1926	Outside
1264	Bonita Hall	1932	Outside
1265	Shelter	Circa 1933	Outside
1268	Storage	1932	Outside
1270	Garage	1932	Outside
1272	Shed	1930	Outside
1275	Workshop	1917	Outside
1276	Lock Shop	1913	Outside
1277	Garage	1925	Outside
1278	Garage and Storage	1924	Outside
1279	Garage	1925	Outside
1280	Garage	1928	Outside
1283	Trunk Storage	1923	Outside
1286	Garage / Storage	1920	Outside
1287	Oil and Storage	1909	Outside
1295	Kitchen and Dining Building	1927	Inside
1300	Power Plant (including Smoke Stack) ²	1925	Inside
1301	Water Tower	1913	Inside
1302	Shop, Laundry, Ice Plant	1909-1911	Inside
1312	Aviary	1888	Outside
1333	Shed	1931	Outside
1334	Vivarium	1926	Outside
1335	Brooder House / Vivarium Annex	1929	Outside
1352	Train Station	1907	Outside
1356	Tool House	1926	Outside
1357	Landscape Office	1938	Outside
1379/4121	Garage	1926-1929	Outside

NOTE:

1. Construction dates to calculate the age of contributing resources are based on the results of the current survey and were calculated using historical aerials, maps, and personal narratives. The current year-built dates may contradict previously estimated construction years; however, the LACO numbers have not changed.

Rancho Los Amigos is one of the six historical resources recognized by Downey Vision 2025 as being significant. In addition to the general importance placed on Rancho Los Amigos, particular emphasis is placed on two of its resources: the Harriman Building (located on the north campus, 2,120 feet north of the proposed project site) and the Moreton Bay fig tree located 149 feet south of the proposed project site.

Historic Context

Begun in 1887/1888 as the new County Poor Farm, Rancho Los Amigos upon its inception was an agricultural facility that provided work, housing, and medical care for the indigent. The original purchase of 124.4 acres in the vicinity of the town of Downey, founded in 1873, was graded for roads, supplied with water from an artesian well, and improved with a Refectory Building, the

North and South Wards, an aviary, and an Office Building by 1889. During the following decade, barns and ancillary buildings with agricultural functions, a freight and passenger railroad depot, a combined bathhouse and laundry facility, and an additional ward were added to the campus. All these improvements, with the exception of the aviary that was moved in 1931, are no longer extant.

The County's goal was to make the Poor Farm as self sufficient as possible through the planting of crops and the raising of dairy cows, chickens and pigs. The inmates at the Poor Farm largely provided the labor for the agricultural efforts, with the assistance of several farm supervisors. Inmates also tended to the numerous trees, lawns and gardens, which decorated the farm landscape. The agricultural program at the Poor Farm was highly successful; throughout the first half of the twentieth century, it was a nationally recognized institution in the fields of cultivation and scientific breeding as a successful producer of prized crops and livestock.

In addition to operating a successful agricultural enterprise, the Poor Farm gradually expanded its role as a County medical facility. By the 1910s, an increasing number of inmates with chronic medical disorders were being admitted to the Poor Farm, prompting administrators to employ a staff of physicians and nurses to treat them. This surge in patients and subsequently employees created the impetus for expanded development at the Poor Farm. Many of the extant buildings were constructed during this surge in growth, which occurred primarily during the first quarter of the 20th century. By the end of the 1920s, the Poor Farm environment reflected its transition from a rehabilitative care facility for indigents into a hospital to house long-term invalid patients.

During the 1930s, funding for the Poor Farm was significantly reduced as a result of the Depression, slowing ongoing expansion efforts. Improvements during this period primarily consisted of maintenance to existing buildings; nonetheless, several significant buildings were erected, including the Harriman Building (not within the Historic District), which became the first modern medical facility on the property grounds. Despite the lack of funds, the Poor Farm managed to maintain all of its existing services and features, including its landscaping department, thanks to the supply of labor provided by the increasing number of admitted inmates. One change that required no funding occurred in 1932; the County changed the official name from County Poor Farm to "Rancho Los Amigos", which means the Friend's Ranch or Ranch of the Friends. This name change served as public notice of the evolving medical mission of the facility, as well as helping to shed the stigma associated with the title of "Poor Farm."

By late 1937, Rancho Los Amigos was treating close to 3,000 patients annually. The average patient age had been dramatically reduced, due to the 1933 enactment of the National Social Security Act, which gave individuals over the age of 65 a \$35 monthly allowance. This allowed these individuals to leave institutional care and provide for themselves. Their departure freed space for chronically ill children to be admitted to the new medical center.³² This shift in types of patients propelled Rancho Los Amigos into becoming a hospital facility. The majority of patients could no longer contribute to the production of the farm, which increased the cost of patient care and forced the gradual phasing out of farming operations. This was confirmed in an April 14, 1941, *Los Angeles Times* article, which stated: "For several years the institution has been more of a convalescent hospital than a county farm, therefore the persons cared for there are designated as patients rather than inmates."³³

³² *Los Angeles Times*. "County Moving Sick Children." 4 October 1937. p. A18.

³³ *Los Angeles Times*. "Poor Farm's Cost Declines." 14 April 1941. p. 26.

The next important shift in the development of Rancho Los Amigos came in 1944, when its doctors began treating polio patients during the mass outbreak in the County. As the epidemic continued for several years, Rancho Los Amigos became a well-known polio rehabilitation center and eventually the world's leading post-polio respiratory center.³⁴ Many of the existing buildings underwent first floor improvements to accommodate polio patients. Most of the polio ward staff became polio treatment experts who taught their methods to other medical professionals all over the country.

With the waning of the polio epidemic by the 1950s, Rancho Los Amigos made its transition to rehabilitative care through the development of a cutting edge rehabilitative program. By the end of the decade Rancho Los Amigos was recognized as a quality medical facility and the farming facilities of the old Poor Farm were phased out.³⁵ Today, Rancho Los Amigos National Rehabilitation Center remains one of five hospitals in the Los Angeles County Department of Health Services and has become a leading center for rehabilitative care.

Resource Characterization

The proposed project area contains 17 buildings and structures that were previously identified as contributors to the Rancho Los Amigos Historic District and are historical resources as defined by CEQA.

Staff Cottages (LACO Nos. 1121 and 1123)

The single-story, Craftsman style, Staff Cottages (LACO Nos. 1121 and 1123) were built in 1921 and 1924, respectively, during the pivotal transition period in the 1920s when Rancho Los Amigos evolved from a poor farm and rehabilitative care facility for indigents into a hospital to house long-term invalid patients. The Staff Cottages are significant contributing features to the Historic District as they exhibit integrity as an important property type associated with the Historic District, which supported the Rancho Los Amigos function as a residential medical care facility.

Patient Wards (LACO Nos. 1189–1199)

The 11 single-story, Craftsman-influenced Patient Wards located within the proposed project site were completed between 1923 and 1928. The Patient Wards are a significant contributing feature to the Historic District, as they exhibit integrity as a critical property type associated with the Historic District and illustrate the transition of the poor farm from a rehabilitative care facility for indigents into a hospital to house long-term invalid patients. The patient wards collectively retain a substantial level of integrity.

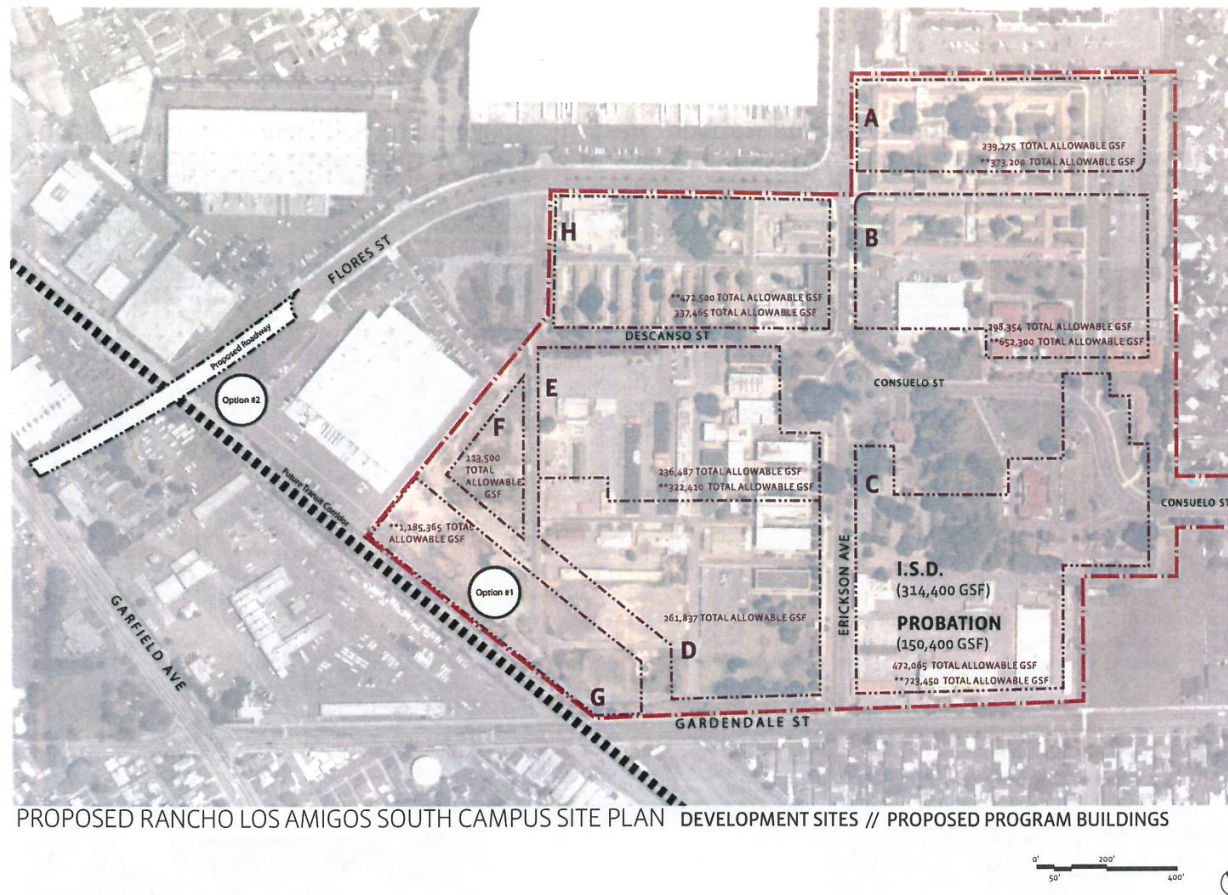
Kitchen and Dining Building (LACO No. 1295)

The one-story Kitchen and Dining Building was constructed in 1927 and displays stripped Classical Revival styling. The Kitchen and Dining Building is a significant contributing feature to the Historic District, as it exhibits architectural character and quality, and it illustrates the use and significance of the Historic District as a medical care facility during the period of significance. The building retains a substantial level of integrity.

³⁴ *Los Angeles Times*. "Rehabilitation Shop to Open." 4 March 1946. p. 8.

³⁵ Historic Resources Group. 26 July 1995. Primary Record and District Record: Rancho Los Amigos Medical Center. Submitted to: Office of Historic Preservation, Department of Parks and Recreation, Sacramento, CA.

Development Plan



- WSAB Transit Corridor
 - Proposed Rail Station Locations
Two location options currently under consideration
 - Planning Area
 - Development Sites (Building)
1,958,983 Total Allowable GSF
 - A. Other County Departments (tbd)
 - B. Other County Departments (tbd)
 - C. I.S.D. & Probation
 - D. Other County Departments (tbd)
 - E. Other County Departments (tbd)
 - F. Other County Departments (tbd)
 - H. Other County Departments (tbd)
 - **Development Sites (Parking)
3,729,225 Total Allowable GSF
 - A. Other County Departments (tbd)
 - B. Other County Departments (tbd)
 - C. I.S.D. & Probation
 - E. Other County Departments (tbd)
 - G. Other County Departments (tbd)
 - H. Other County Departments (tbd)
- Building GSF Available
(1,496,183 GSF)
- Parking GSF Available
(3,078,225 GSF)



Cliff Stokes (Consultant)

From: Mike Lawler <Mike_Lawler@ahm.honda.com>
Sent: Thursday, November 21, 2019 8:02 AM
To: Cliff Stokes (Consultant)
Cc: Yahoo e-MailSecure
Subject: Historical Society of the Crescenta Valley opposes demolition of Rancho Los Amigos
Attachments: Hist Soc of Cres Valley Rancho Los Amigos.pdf

CAUTION: External Email. Proceed Responsibly.

Confidentiality Notice: This transmission (including any attachments) may contain confidential information belonging to the sender and is intended only for the use of the party or entity to which it is addressed. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, retention or the taking of action in reliance on the contents of this transmission is strictly prohibited. If you have received this transmission in error, please immediately notify the sender and erase all information and attachments.



Nov. 21, 2019

Our organization, the Historical Society of the Crescenta Valley respectfully opposes the County's stated plans to demolish much of the Ranch Los Amigos facility. We side with the Los Angeles Conservancy in urging you to formulate a plan of adaptive reuse.

We have been much encouraged by the County's trend toward recognizing the important history of various elements in the County's portfolio of properties. We think the County would be taking a step back by moving away from reusing this very historic group of buildings. I think that we all need to recognize that upgrading and reoccupying older buildings has become popular, and can actually increase the value of a project.

Please follow the LA Conservancy's recommendations for adaptive reuse of the Ranch Los Amigos property.

C4-1

Michael Morgan, President
Historical Society of the Crescenta Valley
2717 Altura Ave.
La Crescenta, CA 91214



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acm@cbcearthlaw.com

Direct Dial:
310-798-2400 Ext. 3

November 21, 2019

Via Email (CStokes@dpw.lacounty.gov)

Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803

Re: Comments on Draft EIR for Rancho Los Amigos South Campus Project;
SCH No. 2017081017

Dear Mr. Stokes:

On behalf of the Los Angeles Conservancy, we provide these comments regarding the draft environmental impact report (“DEIR”) for the proposed Rancho Los Amigos South Campus Project (“Project”). The Project site is currently occupied by the California Register-listed Rancho Los Amigos Historic District. This important resource is associated with Los Angeles County’s turn-of-the-century treatment of indigent population and later health care for County residents with chronic mental and physical illnesses. It is a rare remaining example of such a large facility, charting the transition of the site’s transformation from a Poor Farm to a rehabilitative care facility. Instead of reflecting the care and consideration that should be provided such a significant resource, the County has for years failed in its legal duties to act as steward of this historic district, allowing some deterioration to take place. The County now attempts to use the years of neglect it has shown these resources as a basis for nearly wholesale demolition of the district, when new construction is proposed for only a portion of the site.

C5-1

The DEIR is legally inadequate in its description of existing conditions, failing to support claims regarding the condition of existing resources or disclose its legal duty to protect those resources. The County attempts to use the DEIR as a post hoc rationalization for its predetermination that nearly the entirety of the Rancho Los Amigos Historic District should be demolished. The DEIR should instead have considered

C5-2

feasible alternatives that incorporate a mix of new construction and adaptive reuse of many of the buildings that are contributing resources to the historic district. The Los Angeles Conservancy has advocated for this win-win approach for a number of years, but the County has yet to take the necessary hard look at this proposal, in violation of the requirements of the California Environmental Quality Act (“CEQA”).

C5-2

I. The DEIR’s Impact Analysis is Inadequate.

CEQA serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project’s significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass’n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report process is the “heart of CEQA” and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) We are concerned that the DEIR fails to adequately and accurately disclose, analyze, and mitigate the Project’s significant adverse environmental impacts on the Rancho Los Amigos Historic District.

C5-3

A. The EIR Includes a Misleading and Unsupported Description of Existing Conditions.

“To decide whether a given project's environmental effects are likely to be significant, the agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis.” (*Communities For A Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 315.) Without an accurate baseline description, “analysis of impacts, mitigation measures and project alternatives becomes impossible.” (*County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 953.)

C5-4

Here, the DEIR has failed to provided a complete and supported description of the status of the contributing resources in the Rancho Los Amigos Historic District. The DEIR claims the majority of these historic resources are in poor condition, resulting in hazardous conditions that need to be rectified through their demolition. First, the DEIR fails to provide documentation to support its claims regarding the poor condition of the existing resources. Moreover, under the County Code, the owner of an historic district,

here the County, is prohibited from neglecting such resources in a manner that causes severe deterioration. (Los Angeles County Code 22.14.080 - H.) The DEIR admits that the County has left these resources unsecured. (DEIR p. 2-15.) Absent the proposed Project, as the steward of these resources, the County is required to provide maintenance and repair. Any failure to have done so prior to consideration of this project is a legal violation by the County.

C5-4

Further, the DEIR claims that the resources present an existing safety hazard because they contain asbestos containing materials and lead based paint. However, this claim fails to acknowledge that until these materials are disturbed, they do not present a public safety hazard. Thus, under existing conditions, the resources are not a safety hazard.

B. The EIR Fails to Meet CEQA's Informational Requirements in the Analysis of Cultural Resources.

An EIR must be sufficient as an informational document to be found legal valid. (*Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 935; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.) Depriving the public of a full understanding of environmental issues is a prejudicial informational defect, requiring reversal of an agency's approval of a project. (*Ibid.*) Additionally, the EIR itself must contain an adequate analysis of impacts; an agency cannot cure an EIR's informational defects by relying upon information or evidence that is not contained in the EIR.

C5-5

As discussed above, the DEIR's discussion of Rancho Los Amigos Historic District is misleading and unsupported in its claims regarding the condition and safety hazards present in these resources. The DEIR's assumption that historic resources must be demolished to avoid impacts does not fully disclose the Project's historic resource impacts. This does not provide the necessary information disclosure required by CEQA.

The DEIR's analysis of cultural resource impacts is also informationally deficient because it fails to include a referenced memorandum that identifies the character-defining features of the contributing resources to the Rancho Los Amigos Historic District. Until this week, the Conservancy was unable to review memorandum. To the Conservancy's knowledge, no other parties have been able to review the memorandum. Failing to include the memorandum in the DEIR, or otherwise make it available to the public,

deprives the public of a full understanding of the Project's impacts on this historic district.

↑ C5-5

II. The EIR's Alternatives Analysis is Inadequate.

The purpose of an alternatives analysis is to determine if feasible alternatives or feasible mitigation measures would substantially lessen a project's significant environmental effects. (Pub. Resources Code § 21002.) For this reason, the alternatives analysis is the "core of the EIR." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.) "One of [an EIR's] major functions . . . is to ensure that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights Improvement Ass'n. v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400.) Further, "Under CEQA, the public agency bears the burden of affirmatively demonstrating that...the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134.)

Here, the Project would have several significant impacts the DEIR considers to be unavoidable: shade and shadow; NOx emissions; cultural resource impacts to an historic district and individual resources; greenhouse gas emissions; construction noise; and traffic. The County can only approve the Project with its significant and unavoidable impacts if "there is no feasible way to lessen or avoid the significant effect[s]." (CEQA Guidelines § 15043.) When an agency seeks to approve a project despite the significant impacts the project would have on the environment, the agency must adopt a statement of overriding considerations. (Pub. Res. Code § 21081.) A statement of overriding considerations must include specific finding, supported by substantial evidence, that "[t]here is no feasible way to lessen or avoid the significant effect..." (CEQA Guidelines §§ 15043, 15093(b).) Although a statement of overriding considerations is a policy statement, it must still be supported by substantial evidence. (*Woodward Park Homeowners, supra*, 150 Cal. App. 4th at 718.) A less impactful alternative can only be rejected if it is "truly infeasible." (*City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 369.)

C5-6

The DEIR's analysis of alternatives fails to demonstrate that less impactful alternatives are infeasible. Additionally, "[o]ne of [an EIR's] major functions . . . is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (*Wildlife Alive v. Chickering* (1976) 17 Cal.3d 190, 197.) Here, the DEIR has attempted to design the presented alternatives to fail to meet the project



objectives, providing straw men instead of including slight revisions of these viable alternatives suggested by the Conservancy that would allow them to more fully meet project objectives.

A. The Partial Preservation Alternative is a Less Impactful and Feasible Alternative.

The DEIR includes a Partial Preservation Alternative that includes two scenarios, one in which demolition of the primary and secondary contributing resources to the Rancho Los Amigos Historic District would be averted and a second wherein only primary resources would be saved from demolition. Instead of taking the logical step and proposing repurposing of these contributing resources for adaptive reuse by other County departments and services (or public-serving uses such as a visitor/historic center, a fitness center, a café, a dining hall, a daycare facility, a farmers' market, a conference center or other commercial endeavors) the DEIR proposes to mothball the contributing resources. The Partial Preservation Alternative would also still include the same amount of new construction, including a County office building, parking structure, Internal Services Department Headquarters and Probation Headquarters. These new buildings would be constructed on the southwest portion of the large project site under this alternative and two contributing resources would need to be relocated to allow for the new construction.

The Partial Preservation Alternative would eliminate or substantially lessen several of the Project's significant adverse impacts. It would eliminate the Project's shade and shadow impacts on existing residential development located east of the Project site. Adverse impacts to the Rancho Los Amigos Historic District and individually significant historic resources on the Project site would be substantially lessened by this Project's preservation of the district's primary and secondary contributing resources. Construction noise impacts would also be reduced. Additionally, this alternative would not result in any new or more significant impacts as compared to the proposed Project.

The DEIR does not provide any information to support a claim that the Partial Preservation Alternative would be economically infeasible. Construction costs may be reduced because the new buildings would be located in closer proximity to each other. Additionally, many of the demolition costs associated with the proposed Project would be eliminated. Based on the information provided, the Partial Preservation Alternative is economically feasible.

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C5-6

C5-7
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The DEIR further acknowledges that the Partial Preservation Alternative would meet the majority of project objectives, albeit claiming some to a lesser extent than the Project. It is well settled that “[i]f there are feasible alternatives or feasible mitigation measures that would accomplish *most* of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures.” (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1371 fn 19, citation to (Pub. Resources Code §§ 21000(g), 21002, CEQA Guidelines § 15091); see also CEQA Guidelines § 15126.6(b).) Alternatives are not required to meet all project objectives, and in reality it “is virtually a given that the alternatives to a project will not attain all of the project’s objectives.” (*Watsonville Pilots Ass’n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.)

The DEIR claims that the Partial Preservation Alternative would not meet objectives “to provide proximity to other surrounding County facilities, an attractive, uncluttered visible gateway to the South Campus from Imperial Highway, or establish a common character and tone for the South Campus as it would bring office uses in proximity to residential uses south of the Project Site.” The County cannot reject less impactful alternatives for failing to meet the exact design of the proposed Project; to do so would be reliance on improperly narrow project objectives to dictate what constitutes a feasible project alternative. (*Preservation Action Council v City of San Jose* (2006) 141 Cal App. 4th 1336, 1355. “[A] lead agency may not give a project’s purpose an artificially narrow definition” and thereby circumscribe the alternatives analysis. (*In re Bay Delta Prog. Environmental Impact Report Coord. Proceedings* (2008) 43 Cal. 4th 1143, 1166.) That the Partial Preservation Alternative does not meet the exact design specifications of the proposed Project is an invalid basis for rejecting this alternative.

The DEIR also faults the Partial Preservation Alternative for including the mothballing of the remaining contributing resources, however, there is no basis for requiring mothballing instead of offering these resources for adaptive reuse as discussed above. The County cannot provide alternatives “designed to fail” in order to favor the proposed Project. This is a cynical use of the EIR process and a legally invalid method of analyzing alternatives, one that fails to comply with the County’s responsibility under CEQA. The Adaptive Reuse/Reduce Project Alternative makes clear that adaptive reuse of a number of the most significant historic resources on the site is feasible.

C5-7



Because the Partial Preservation Alternative would meet the majority of the project objectives and is legally, economically, and technically feasible, the County lacks the necessary evidentiary support to reject this less impactful alternatives as infeasible.

↑
C5-7

B. The Reduced Demolition Alternative is a Less Impactful and Feasible Alternative

The Reduced Demolition Alternative also proposes to reduce the number of contributing resources to the Rancho Los Amigos Historic District that are demolished. It would include the construction of the County office building, parking structure, Internal Services Department Headquarters and Probation Headquarters in approximately the same location as the proposed Project, but would not demolish the historic resources located outside of the development footprint. Instead, as with the Partial Preservation Alternative, the Reduced Demolition Alternative proposes to mothball the remaining resources.

The Reduced Demolition Alternative would substantially lessen the Project's significant cultural resource impacts. It would also not result in any new or more significant adverse impacts. Thus, it is less impactful than the proposed Project.

C5-8

The DEIR claims the mothballing process would be expensive, but fails to provide any evidentiary support for this claim, let alone the necessary comparative economic analysis required to claim an alternative it economically infeasible. (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th 587, 599.) Further, 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* (1988) 197 Cal.App.3d 1167, 1181.) No such showing has been made and thus any claim of economic infeasibility is unsupported.

As with the Partial Preservation Alternative, designing the Reduced Demolition Alternative to include mothballing of remaining resources instead of adaptive reuse is an invalid basis for rejecting this alternative. The DEIR lacks any analysis of the ability to reuse the remaining contributor buildings for other County or public serving uses. For all of these reasons, the County lacks the necessary evidentiary support to claim the Reduced Demolition Alternative is infeasible.

C. The Adaptive Reuse/Reduced Project Alternative is Less Impactful and Feasible.

The Adaptive Reuse/Reduced Project Alternative provides for the adaptive reuse of existing contributing resource buildings for the Project's County uses instead of constructing new buildings. The DEIR's analysis of this alternative states that it would reduce the square footage available for relocating County uses, thus requiring some employees to remain in the facilities where they are currently located. All primary and secondary contributing resources would be preserved, while the tertiary and non-contributors would be demolished.

This alternative was determined to be the environmentally superior alternative—the alternative with the fewest adverse environmental impacts. This is because it would eliminate or substantially lessen the proposed Project's aesthetic, air quality, cultural resource, greenhouse gas, noise and traffic impacts.

As discussed above, the DEIR fails to provide any cost analysis to support a claim of economic infeasibility of this alternative. The Adaptive Reuse/Reduced Project Alternative eliminates the expense of new construction, which must be compared to the costs associated with rehabilitation of historic resources. The County should also consider whether costs of rehabilitation can be reduced under California's recently approved State Historic Tax Credit bill. This bill would provide tax credits for expenses associated with qualifying rehabilitation of historic resources.

The Adaptive Reuse/Reduced Project Alternative would meet the majority of the project objectives, making it a feasible alternative. The main contention in the DEIR regarding this alternative is that it does not provide the same amount of new space as the proposed Project. This is a self-imposed design flaw for the alternative, not a showing of infeasibility. The Adaptive Reuse/Reduced Project Alternative includes the removal of tertiary contributors and non-contributor buildings, leaving large areas of the southwest Project site and along the east side of Erickson Avenue open for new construction. If additional space is required for County office, new construction could contain it in these cleared areas. Central to accomplishing CEQA's substantive goals of public participation and lessening adverse environmental impacts is that the development, analysis, and thorough assessment of alternatives reflect "an objective, good-faith effort to comply [with CEQA]." (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89

C5-9



Cliff Stokes
November 21, 2019
Page 9 of 9

Cal.App.3d 274, 287.) Designing alternatives to fail is not a good faith effort at CEQA compliance.

↑ C5-9

D. The County Must Consider a Hybrid Adaptive Reuse/New Construction Alternative.

As discussed above, instead of manufacturing alternatives with components the County considers to be fatal flaws, the DEIR should consider an alternative that includes both new construction and adaptive reuse. Failure to do so is a failure to consider the necessary range of alternatives since an EIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation.” (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1456.) The County cannot reject consideration of this feasible and less impactful alternative without an “explanation [] sufficient to enable meaningful public participation and criticism.” (*Ibid.*)

C5-10

Conclusion

Thank you for your consideration in this matter. We look forward to reviewing your responses to our comments.

C5-11

Sincerely,



Amy Minter

Cliff Stokes (Consultant)

From: WeHo Preservation Alliance <board.whpa@gmail.com>
Sent: Thursday, November 21, 2019 4:01 PM
To: Cliff Stokes (Consultant)
Cc: sheila@bos.lacounty.gov; tosborn@bos.lacounty.gov; mrysman@bos.lacounty.gov; kyaroslavsky@bos.lacounty.gov; council@weho.org; Jennifer Alkire; pnoonan@weho.org; Adrian Fine
Subject: WHPA Comments on Rancho Los Amigos South Campus DEIR

CAUTION: External Email. Proceed Responsibly.

November 21, 2019

Mr. Cliff Stokes
Projects Manager
County of Los Angeles Department of Public Works

RE: Rancho Los Amigos South Campus Project Draft Environmental Impact Report Comments

Dear Mr. Stokes:

The West Hollywood Preservation Alliance (WHPA), a nonprofit community organization dedicated to historic preservation, stands with the Los Angeles Conservancy and the burgeoning effort countywide to protect, preserve, and adaptively reuse the unique historic resource now threatened by the proposed Rancho Los Amigos South Campus Project. Originally established in 1888 as the L.A. County Poor Farm, this culturally and architecturally significant site has been listed on the California Register of Historical Resources for over two decades and is also considered as eligible for listing as a historic district on the National Register of Historic Places.

C6-1

As part of the County's proposed project, it appears that over 50 historic buildings are slated for demolition. Plans have called for only a few of the extant buildings to be preserved, including the 1926 Administration Staff building and the 1930 Casa Consuelo patient ward, as well as a Moreton Bay fig tree and a water tower from 1913.

In our estimation, this is a start but quite inadequate when we see other similar historic sites and campuses repurposed nationwide and in our very own California. One has only to look north to the preserved yet revitalized Presidio in San Francisco County or to the south to the vibrant commercial and residential Liberty Station in San Diego County (a former naval training center) to see what could be accomplished with some imagination and determination here in Los Angeles County.

C6-2

Thank you for considering these comments and for placing this letter into the public record.

C6-3

Victor Omelczenko
Board President
West Hollywood Preservation Alliance

Letter D1

Cliff Stokes (Consultant)

From: Jim Fountain <je.fountain@hotmail.com>
Sent: Tuesday, October 15, 2019 1:30 PM
To: Cliff Stokes (Consultant)
Cc: Carolyn Fountain; Luis Ramirez
Subject: Questions Regarding Rancho Los Amigos South Campus Project

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

RE: Questions on the Draft EIR for the Rancho Los Amigos South Campus Project

Mr. Clifford Stokes
Project Manager
Los Angeles County Dept. of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803

Mr. Stokes,

Thank you for both the FedEx and the U.S. Mail Notification of the Public Meeting on the Draft EIR, Monday, October 28. I look forward to personally meeting you.

My credentials as a stakeholder:

- I'm a homeowner at 7814 Adoree St. on the South Rancho East boundary for 45 years.
- I had prior employment on Rancho's South Campus at the STD Program, L.A. County Public Health Department, 12838 Erickson Ave. Downey, CA 90242 (South Rancho Campus) in the 1980s.

As stated in my email to Luis Ramirez August 10, 2019, on the Rancho Los Amigos NOP, I still have the same three unanswered concerns about traffic, high-rise buildings, and garage issues expected as a result of an influx of 3,000 Los Angeles County employees to Rancho's South Campus. My three unanswered questions are:

1. Can L.A. County work with Downey and South Gate (Holydale area) to return Gardendale St to its original 4 lanes in each direction for the current 2 lanes configuration?
2. Is it possible to improve access off and on Imperial Highway at the Erickson Ave?
3. Were the sightlines for the single-family neighborhood East of the Rancho South Campus Development taken into consideration with the anticipated 5-6 story office buildings and a nine-story parking garage?

Please feel free to contact me at:

James Fountain
Mobile: 562-896-5461
Email: je.fountain@hotmail.com
Address: 7814 Adoree St. Downey, CA 90242

D1-1

D1-2

Letter D2

Cliff Stokes (Consultant)

From: Nancy Webber <nwebber1937@gmail.com>
Sent: Tuesday, October 22, 2019 1:17 PM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconversany
Subject: Rancho Los Amigos

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Please put up a strong fight to preserve all the historic buildings in this area. This is a legacy of our cultural past and cannot be replaced. Thank you.

Sincerely,
Nancy

D2-1

Sent from my iPad

Letter D3

Cliff Stokes (Consultant)

From: clcordoba@sbcglobal.net
Sent: Tuesday, October 22, 2019 9:05 PM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: Preservation of Rancho Los Amigos

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Hello,

I would like to add my voice to the effort to preserve and restore Downey's Rancho Los Amigos. We need to safeguard our cultural and architectural heritage. We too quickly forget LA's great history and this building needs our support!

Thank you

Carlos Cordoba
clcordoba@sbcglobal.net
818-635-7318



Virus-free. www.avast.com

D3-1

Letter D4

Cliff Stokes (Consultant)

From: Chris Nichols <nixols@yahoo.com>
Sent: Tuesday, October 22, 2019 11:36 AM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: Rancho Los Amigos South Campus

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60 historic buildings

California Register-listed and National Register-eligible historic district dating to 1888.
retaining only two
seventy-four-acre site

D4-1

Letter D5

Cliff Stokes (Consultant)

From: Chris Nichols <nixols@yahoo.com>
Sent: Tuesday, October 22, 2019 11:41 AM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: Rancho Los Amigos South Campus

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Dear Mr. Stokes,

I understand that Los Angeles County is considering the demolition of 60 historic buildings at the Rancho Los Amigos South Campus. I encourage you to consider more preservation alternatives on this 74-acre site. This is a rare location that has not been disturbed much in its 130-year history and the County has a responsibility to take extra measures to retain the integrity of these National Register of Historic Places-worthy buildings. I'm sure the relocated divisions would be much happier in restored historic structures with a rich history than in an anonymous new office park. The community deserves better.

Thank you.

Best,
Chris Nichols

D5-1

Letter D6

Cliff Stokes (Consultant)

From: Denise Smith <denise@cosmicmicrotech.com>
Sent: Tuesday, October 22, 2019 11:34 AM
To: Cliff Stokes (Consultant); vanbreene@laconservancy.org
Subject: rancho

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Please help restore our history instead of eliminating it. Rancho los amigos should be restored and maybe again be used to help those in need. Imagine restoring these buildings in all of their glory and reusing them instead of again destroying beautiful historic architecture. There was a need for these buildings in the 20th century, let's restore and use them now. PLEASE do NOT allow these historic properties to be demolished. So much of our wonderful architectural history has been demolished.

D6-1

Imagine restoration and historic instruction of the architecture and past usage of these buildings. Let's keep historic California, restore and reuse wisely while educating our residents on our important history.

Regards,
Denise and Steve Smith

Letter D7

Cliff Stokes (Consultant)

From: Dennis Hill <photos@dennishill.com>
Sent: Tuesday, October 22, 2019 11:43 AM
To: Cliff Stokes (Consultant)
Subject: Demolition of Downey's Rancho Los Amigos

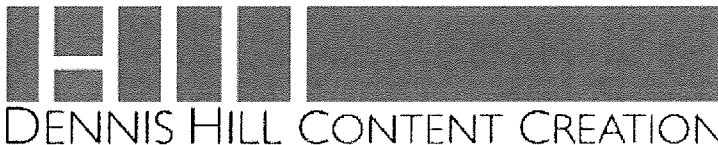
CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Dear Mr. Stokes,

It is very important to preserve our historic and cultural resources. Adaptive reuse is a great way to accomplish this goal. It also make environmental and economic sense. In either case, whether saved or not, it is very important that this site and this building and its context be documented to HABS standards by the developer as part of the mitigation prior to issuing demolition and/or building permits.

If you are not familiar with HABS documentation I would be happy to discuss it with you and give you many examples of other cities that have done this work including Upland, Pasadena, Bradbury, Los Angeles, Long Beach, Beverly Hills, and Santa Paula, among others.

Dennis Hill Content Creation
626 345 0670
creator@dennishill.com
www.dennishill.com
[https://dennishill.exposure.co/.](https://dennishill.exposure.co/)



D7-1

Letter D8

Cliff Stokes (Consultant)

From: Marilyn Welch <marilynwelch7@hotmail.com>
Sent: Tuesday, October 22, 2019 9:01 PM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: Rancho Los Amigos Historic District

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Cliff Stokes
Projects Manager for the County of Los Angeles Department of Public Works

Mr. Stokes,
Please save and preserve the Rancho Los Amigos Historic District. It is so beautiful and historically important to LA County and California, it should be reused not demolished.
Sincerely,
Marilyn Welch

D8-1

Letter D9

Cliff Stokes (Consultant)

From: Valerie Ho <valerieho0216@gmail.com>
Sent: Tuesday, October 22, 2019 10:59 PM
To: Cliff Stokes (Consultant)
Subject: Historic buildings in Downey

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Please do not destroy them. The Los Angeles metropolitan area is heinous as it is because we have done a terrible job of preserving architectural consistency and historic buildings. We owe it to future generations to preserve.

D9-1

Letter D10

Cliff Stokes (Consultant)

From: Erik <stokiene@gmail.com>
Sent: Wednesday, October 23, 2019 6:13 AM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: Help Stop Demolition of Rancho Los Amigos Campus

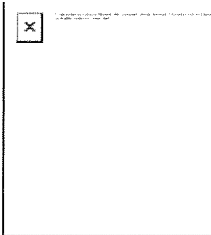
CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Dear sir,

I oppose the destruction of the Rancho Los Amigos facilities and redevelopment of the campus. We have already lost too much of historic LA County.

Regards,
Erik Stokien

[Click here](#) to view this message in a browser window.



Help Stop Demolition of Downey's Rancho Los Amigos – Attend Important Meeting on Monday

Letter D11

Cliff Stokes (Consultant)

From: DiAne <dianeandbob@roadrunner.com>
Sent: Wednesday, October 23, 2019 8:51 AM
To: Cliff Stokes (Consultant)
Subject: Rancho los amigos

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

I urge you to respect and keep this important, meaningful site for all Californians Sincerely. Jacklyn loughbom Sent from my iPhone

D11-1

Letter D12

Cliff Stokes (Consultant)

From: Leora Glass <leoraglass@me.com>
Sent: Thursday, October 24, 2019 7:43 PM
To: Cliff Stokes (Consultant)
Cc: vanbreene@laconservancy.org
Subject: DOWNEY RANCHO LOS AMIGOS

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

PLEASE reuse rather than demolish DOWNEY'S RANCHO LOS AMIGOS. DO NOT demolish these historic buildings

PLEASE SAVE Over 60 historic buildings slated for demolition as part of the Los Angeles County's proposal for the Rancho Los Amigos (RLA) South Campus, a California Register-listed and National Register-eligible historic district dating to 1888. In total, the County plans to demolish over 100 existing buildings as part of the redevelopment, retaining only two historic buildings (1926 Administration Staff building and 1930 Casa Consuelo patient ward; currently empty with no plans for reuse), a Moreton Bay fig tree, and a water tower (1913).

D12-1

Thank you for your consideration.

Leora Glass
an LA Conservancy member
leoraglass@me.com

Letter D13

Cliff Stokes (Consultant)

From: heather sabin <hsabin40@hotmail.com>
Sent: Friday, October 25, 2019 12:53 PM
To: Cliff Stokes (Consultant); vanbreene@laconservancy.org
Subject: Rancho Los Amigos

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Please reuse Rancho Los Amigos rather than tearing it down and developing it. It has a very important history in LA, and sad to say, I believe we will always be dealing with one humanitarian crisis or another and we are in the midst of another homeless crisis. Voters have approved money for building housing for the homeless. I would so much rather see something like this being restored back into facilities in line with its original purpose than just another development while we continue to leave vulnerable people out on the street.

Thank you,

Heather Sabin
3844 York Blvd
Los Angeles, CA 90065

D13-1



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

PUBLIC MEETING FOR THE
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT



OCTOBER 28, 2019

Written Comment Form

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Name: ALICIA Flores-Rivera
Address: 10325 Garfield ave.
South Gate CA
90280

D14-1

Would like to know if the County will be helping with street improvements to help with the impact of all the traffic that will increase on Gardendale, Paramount Garfield and Imperial Hwy. And will our streets be returned to 4 lanes by removing the ~~big~~ bike lanes. I ask that you please take this into consideration because you will be impacting lots of residents.

Please leave this form in the box provided or mail to **Cliff Stokes, Project Manager, County of Los Angeles Department of Public Works, 900 South Fremont Ave., 5th Floor, Alhambra, CA 91803**. This preaddressed form can simply be folded and placed in a mailbox.

Please remember to add postage.

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Name:

Address:

Andrea Paulino
11625 Utah Ave
Hollywood CA 90280

D15-1

my city should not have to pay for problems county creates
We want another meeting where we can ask questions and get answers.

D15-2

return gardendale to 4 lanes.

D15-3

county should pay for the needed road improvements.
county needs to allocate monies to ease the significant impact on our neighborhoods.

D15-4

too much traffic created by this which leads to poor air quality.

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Name:

Brisaida Ramirez

Address:

7908 Puritan St

Downey 90242

- D16-1 - Concerned with construction, affecting the structures of our home. If so was the case would we be re-inhabited?
- D16-2 - For the empty space on Canelo St, can it be possible to sell or grant space to the homeowners on adjacent properties? for the trouble of us taking in increase traffic (big trucks passing by making trembling noise), Noise, air pollution?
- D16-3 - Downey residents should be able to use sports complex being built. Its only fair!

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Name:
Address:

Cecilia Tellez
7826 Duran St
Downey CA 90240
562-441-2718

D17-1 My concern is traffic on Consuelo St. Direct behind my home, pollution, noise.

D17-2 I concern on the whole impact maybe seeing or unseeing

D17-3 one other concern is what exactly going to happen w/ the empty lot behind my house?

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Name: DAVID A. SMITH
Address: 10237 KARMANT AVE.
SOUTH GATE, CA 90280

TWO COUNTY BUILDINGS EXIT TO IMPERIAL
OR PARAMOUNT, NOT GARDENDALE

D18-1

I BELIEVE I SPEAK FOR MANY SOUTH GATE RESIDES WHO FEEL THE COUNTY BUILDINGS PROPOSED FOR SOUTH CAMPUS OF RANCHO WILL IMPROVE THE WAY THE AREA LOOKS, BUT THESE SAME RESIDENTS DREAD THE HUGE INCREASE IN TRAFFIC, ESPECIALLY THOSE RESIDENTS OF HOLLYDALE ALONG GARDENDALE AND OTHER SIDE STREETS. I'M HOPING THE COUNTY WILL TRY TO DIVERT MOST OF THE VEHICLES TO MAJOR STREETS SUCH AS PARAMOUNT BLVD AND IMPERIAL HWY, THUS LIMITING GREATLY VEHICLES EXITING RANCHO PROPERTY ON GARDENDALE.

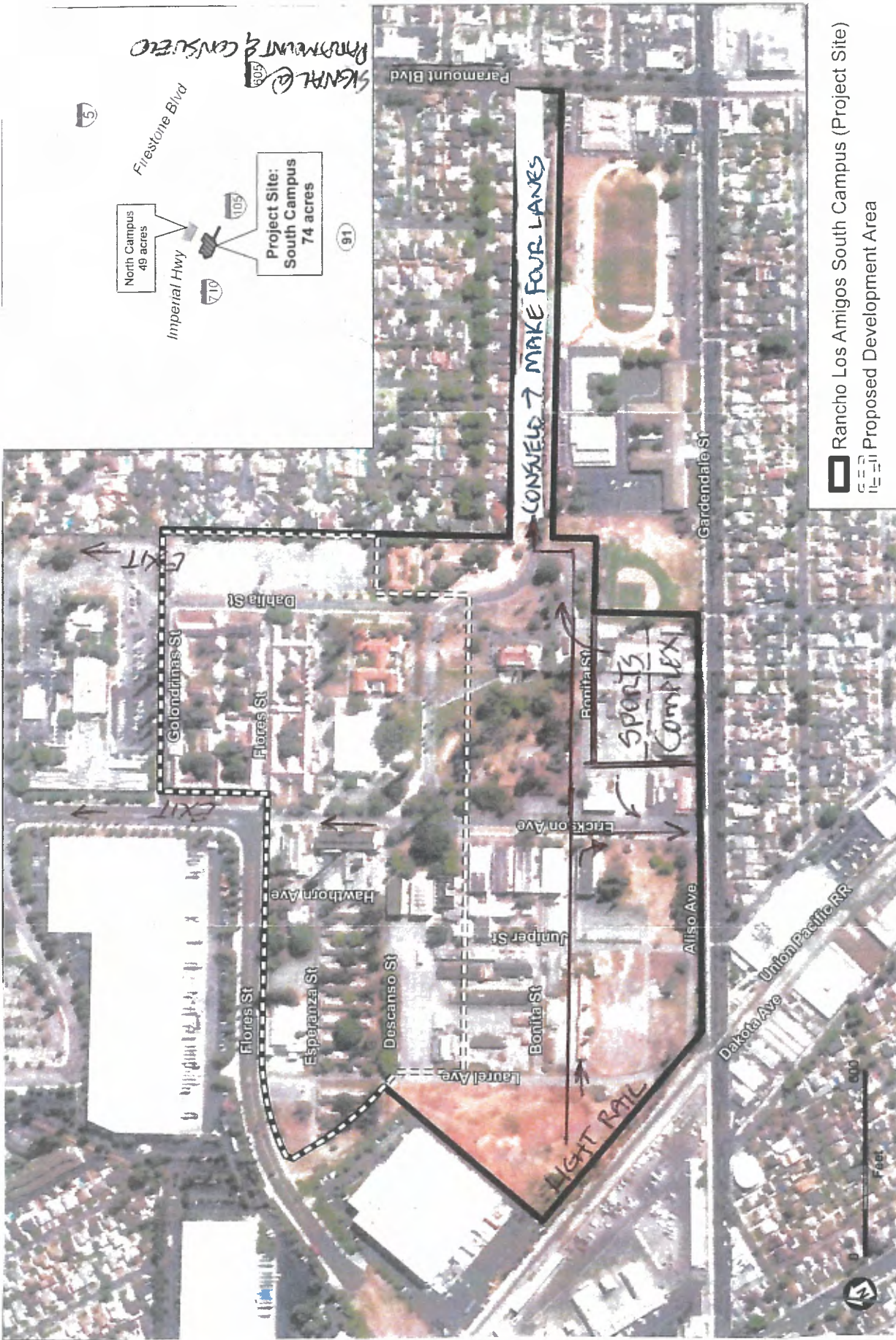
I THINK ONE WAY TO ACCOMPLISH THIS WOULD BE TO EXPAND CONSUELO FROM TWO LANES TO FOUR, SINCE THERE IS SUFFICIENT ROOM AND PLACE A SIGNAL AT INTERSECTION WITH PARAMOUNT. THIS WOULD HAVE TRAFFIC HEADED FROM RANCHO SOUTH TO PARAMOUNT ALONG CONSUELO INSTEAD OF HOLLYDALES RESIDENTIAL STREET OF GARDENDALE. THEN WHEN THE SPORTS COMPLEX IS BUILT, HAVE IT SPLIT WITH A NORTH AND SOUTH PARKING LOT, NORTH LOT EXIT N/TO IMPERIAL OR DOWN CONSUELO TO PARAMOUNT. THEN SOUTH PARKING LOT EXIT ON ERICKSON TO GARDENDALE, USE ERICKSON FOR EXIT OF RAIL STATION LOT AND SOUTH PARKING LOT OF SPORTS COMPLEX, WITH ALL THE OTHER PROJECTS PROPOSED FOR SFW, DOWNNEY AND EAST SOUTH GATE, ANY ASSISTANCE TO LIMIT TRAFFIC ON A RESIDENTIAL IS OF GREAT IMPORTANCE (GARDENDALE)

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Please remember to add postage.

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Attachment A



Rancho Los Amigos South Campus (Project Site)
 Proposed Development Area



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Name:
Address:

Jean O. Douglass
12878 Dahlia St.
Downey, CA 90242
Down next door. at HOME
Downey East League

D19-1

Building #3592 - What is status of building? what will happen to it per project - let's present status is a hazard inviting vandalism and destruction beside weed over growth. Would it remain fenced & uncared for! ???

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Name:

Address:

Linda Parsonson
5780 Main St
South Gate

D20-1

Do you know for sure where the
graveyard is?

D20-2

Please save the heating building near the
water tower. It is brick

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Name: Linda Parsonson
Address: 5780 Main St
South Gate

D21-1

& Gardendale
When trains cross Garfield the traffic backs up.
Has the increase in trains been considered in
the effect on traffic

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Name:

Address:

Pence Allen
5715 Roosevelt Ave.
S. Gate City
Alhambra

D22-1

Issues that need to be addressed - traffic, take Gardendale back to 4 lanes, instead of 2. restrict entrance & exits to one way turn only. Turning light at Gardendale & Pmt.

D22-2

- keep w/ the style of existing buildings, restrict building heights to 5 stories not 9!

D22-3

- need more patrol by Downey P.O. AND L.A.C.

D22-4

- reconsider demolition of a majority of buildings that could be considered historic landmarks

D22-5

- analysis did not consider housing development at the Amer. Legion site on Gardendale & Gardendale

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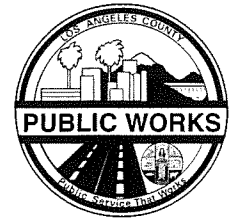
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D23-1

Q @ PER CONVELO TO 4 LANE TO PARAMOUNT BLVD EXIT

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Name:

VICKI A JOHNSON

Address:

5751 McHAULEY AVE

90280

IS IT POSSIBLE TO
NOT USE GANDERDALE?

D23-2

WITH ONLY 1 LANE ON GANDERDALE DR
THE CITY HAVE PLANS TO ADD MORE
LANES FOR THE MINIMUM 3,000 EMPLOYEES.
TRAFFIC BIG WORRY IN OUR
AREA,

D23-3

WHY SO FEW PARK SPACES FOR SPORTS COMPLEX

D23-4

WILL COUNTY WORK WITH DOWNNEY TSG
TO WORK ON THE SIDE STREETS

D23-5

WHAT ABOUT THE 24 HOURS NARCOTICS ON GANDERDALE

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90280

Letter D24

Cliff Stokes (Consultant)

From: GARY HILL <garyhil@prodigy.net>
Sent: Wednesday, October 30, 2019 12:42 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus Project

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

D24-1

Mr. Stokes,
I would like to know what the "PLAN" is for the wildlife that currently are living in the proposed project area. There are many coyotes, possums, skunks, rats and ferule cats. California Dept. of Fish and Game does not allow them to be relocated. Many animal rights folks will be very unhappy if they are exterminated. As a resident homeowner that lives 1 block away, I am going to be quite displeased if they are simply dispersed into the surrounding residential area. Could you please tell me what the "PLAN" is.
Thank You! Gary Hill
5511 Gardendale St.
South Gate, CA 90280
562 322-0679

Letter D25

Cliff Stokes (Consultant)

From: GARY HILL <garyhil@prodigy.net>
Sent: Wednesday, October 30, 2019 1:08 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus Project

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

D25-1

Mr. Stokes,

The proposed project is supposed to bring hundreds of employees into the area daily. Considering that there are already proposed projects in the immediate area. Such as, 100's of apartment units, a sports complex, a hundred unit Veterans housing and a proposed Metro station. The County will be contributing a large portion of the additional traffic. Will the County participate in resolving any traffic issues?

Or, will that be "South Gate and Downeys problem". (like we were told on Oct. 28th)
Will there be any help from L.A. County??

Thank You!

Gary Hill

5511 Gardendale St.

South Gate, CA

90280

562 322-0679

Cliff Stokes (Consultant)

From: Michael Hayes <michael@michaelhayes.la>
Sent: Wednesday, October 30, 2019 9:10 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos

CAUTION: This email originated outside of the County. Please do not click links or open attachments unless you recognize the sender and expect the message.

Hello Mr. Cliff Stokes,

I'm writing to you to express my full support of the preservation and restoration of the Poor Farm / Rancho Los Amigos. As someone working within the architecture / development industry, I would normally be inclined to demolish and build anew, but I firmly believe that much of this site is of historic, cultural and architectural significance.

Too hastily and without foresight, we're inclined to demolish our past and as a result, we are losing vestiges of our *once* dynamic, innovative and relatively young metro area. Buildings from the early years of our region's growth ought to be considered extensively and wholeheartedly for preservation as they are few in number and represent a critical period in the region's explosive growth during the early years of the 20th century.

Not only do I think these structures are worthy of preservation for their outright historic significance, but also as an increasingly desirable format for leasable / profitable space. These early industrial and bungalow buildings have created a demand for unique and characterful environs that are increasingly rare in California. It would not be fair to the people of LA County to not study ways in which the campus can be reused and restored. Below I have listed several Los Angeles based design firms that specialize in adaptive reuse and highlighting the beauty of building styles of yesteryear.

I think in an ideal situation, the site would have consolidated county offices nearest the future planned Metro Station at Gardendale, while carefully and selectively restoring structures that are deemed most feasibly restored / culturally significant. I'd hope that the majority of the open space could serve as a community gathering place / park and that some of the buildings might see reuse in their original function, to house agrarian workers and the neglected / disenfranchised.

In light of social trends and political climate in Los Angeles today, I firmly believe the original use of the Rancho Los Amigos would be well-received and embraced for a culture that is placing a higher value on sustainable agriculture and the humane accommodation for thousands in the area struggling with the high cost of living in Southern California.

Thank you for your consideration and commitment to improving the lives of California's current and future.

-m

Design Firms

www.racdb.com
<https://omgiving.com/>
<http://kfalosangeles.com/>
<https://www.arg-la.com/>
<https://www.page-turnbull.com/>
<https://raptstudio.com/>

Case Studies

City Market South - Downtown (under construction)
ROW DTLA - Downtown
Columbia Square - Hollywood
Blackwelder Campus - Culver City
Bergamont Station - Santa Monica

Letter D27

Cliff Stokes (Consultant)

From: Donna Siemann <donnasiemann@yahoo.com>
Sent: Friday, November 1, 2019 3:15 PM
To: Cliff Stokes (Consultant)
Subject: Fw: The property that was formerly part of Rancho Los Amigos.

CAUTION: External Email. Proceed Responsibly.

----- Forwarded Message -----

From: Donna Siemann <donnasiemann@yahoo.com>
To: Blanca Pacheco <bpacheco@downeyca.org>; rrodriquez@downeyca.org <rrodriquez@downeyca.org>
Sent: Friday, November 1, 2019, 11:04:35 AM PDT
Subject: The property that was formerly part of Rancho Los Amigos.

I'm writing because the Downey Conservancy in my opinion is wrong in trying to save those abandoned building on what was once Rancho grounds. They have been abandoned for many years and if something constructive was going to be done it should of been done by now. Now there are burned up buildings . In my opinion this is a hazardous area in Downey. It is also a complete eyesore. Besides the property belongs to Los Angeles County. Rancho Los Amigos Hospital is a County facility. It has moved it's facility to the other side of Imperial Hwy. and doing just fine. It is time to move on. Let's go with the County plan as soon as possible and get this project off the ground.

Sincerely,

Donna Siemann
10225 Foster Rd.
Downey, CA. 90242
donnasiemann@yahoo.com
(562) 803-0301

P.S. My husband worked at Rancho for 40 years. If someone wants to see the history of Rancho they should visit the Adminstration Building on Rancho. There is also a book written on the history of Rancho when it was 100 years old. We have a copy.

Letter D28

Cliff Stokes (Consultant)

From: Janet <tweeter@anetsolution.com>
Sent: Sunday, November 3, 2019 9:21 AM
To: Cliff Stokes (Consultant)
Subject: Rancho South Campus Project

CAUTION: External Email. Proceed Responsibly.

ATTN. Cliff Stokes
Project Manager
County of Los Angeles Department of Public Works
900 South Fremont Ave., 5th Floor
Alhambra, CA 91803

Re: The Rancho South Campus Project

Dear Mr. Stokes,

I would like to express my concerns over the Rancho South Campus proposed project.

First of all, I am concerned that all the historic buildings are not being saved and will be demolished!

Second of all, I am very concerned about the amount of traffic 3,000 extra employees and cars will bring to the area. I live in the neighborhood right behind the South Rancho campus. There already exists a problem with current workers to that area getting off the 105 Freeway and then making a U-turn at Puritan so they can get to Consuelo. If you add more cars and people turning there during work hours it makes it very difficult for us to get out of our neighborhood (turning right or Left on Paramount Blvd from Puritan). There would need to be a direct Left turn lane for them to get onto Consuelo (currently blocked by a traffic beltway median).

This is already a problem for us and adding 3,000 more cars would make it impossible to get out of our neighborhood in that direction.

Thank you for your time and attention to this matter.
Janet Adams

D28-1

D28-2

D28-3

ALEXANDER B. YOTSOV

7912 Puritan St - Downey, CA 90242

Tel: 562-904-0977 (home); 562-299-3070 (mobile)

E-mail: yotsov@yahoo.com

November 5, 2019

Cliff Stokes – Projects Manager
County of Los Angeles Department of Public Works
900 S. Fremont Ave, 5th Floor
Alhambra, CA 91803

SUBJECT: RANCHO LOS AMIGOS SOUTH DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Stokes,

We own one of the 25 homes bordering the North part of Consuelo St (south side of Puritan St, just west of Paramount Blvd). As a property owner who will be directly affected by the proposed development of the Rancho Los Amigos South Campus I would like to clarify the future of Consuelo Street.

Historically we encountered problems with rodents, trash and lack of maintenance of the grass area. There is no question that the new development will dramatically increase the traffic noise and air pollution along with other factors such as overnight parking and speeding. The draft EIR included a study of 27 traffic intersections located in the vicinity. Section 3.11.1 (page 3.11-1) of the Draft EIR reads in part:

“A total of 27 key intersections in Downey, So. Gate, Paramount, Lynwood, and the County of LA were selected...for analysis of potential traffic impacts due to the proposed project. These intersections were selected due to their potential to be most affected by traffic generated by the proposed project.”

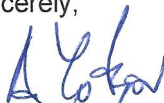
I am very surprised and puzzled as to why the intersection of Paramount Blvd and Consuelo St was not included in this study. Does the city and County think that the development will not have impact on this intersection? Or will the County plan to close this portion of Consuelo Street permanently? If yes, what will be the new use of it? This is a major omission since the lack of such data deprives us from making comments at this point of time. I expect to see data for this intersection in the final report.

It is apparent that the property owners along Consuelo St will be adversely affected in more than one way. This will ultimately result in a drop in property values. I would like to make the following proposals to Los Angeles County as the owner and developer of this new project

1. Grant the strip of land along Consuelo St to the owners of the adjacent properties. This will allow planting of additional vegetation behind our properties to serve as a sound and privacy barrier. New residential units on this strip of land could be an added benefit both to property owners and the County.
2. Offer the adjacent owners a monetary compensation in order to offset the loss in property value.

I will be more than happy to arrange a neighborhood meeting with the affected property owners, if needed. Thank you in advance for addressing these topics.

Sincerely,



Alexander Yotsov

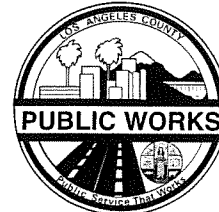
D29-1

D29-2



**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

**PUBLIC MEETING FOR THE
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**



OCTOBER 28, 2019

Written Comment Form

The purpose of the public meeting is to solicit comments from the interested parties and the public regarding the Draft Environmental Impact Report (EIR)'s analysis for the Rancho Los Amigos South Campus Project (the "Project"). The Project would develop new County administrative buildings on the South Campus, including the Internal Services Department Headquarters, Probation Department Headquarters, and a County Office Building. The Project would also include the development of two parking structures for employees and visitors. The Project would include all necessary utilities and points of connection, roadways, curbs and gutters, sidewalks, medians, site structures, hydrants, vaults, manholes, substations, street lights, street signage, landscaping, and irrigation for the proposed new development. The Project would also include the off-site improvements, such as those required for utilities. The Project would develop a total square footage up to 650,000 square feet, and require demolition of existing buildings and structures throughout the South Campus.

Comments will only be accepted in written form. The deadline for submitting written comments to the County is **November 22, 2019**. In the space below (use additional pages if necessary), please provide any written comments you may have concerning the analysis provided in the Draft EIR for the Project. Your comments will then be considered and addressed in the Final EIR.

Name: GARY HILL
Address: 5511 GARDENDALE ST
SOUTH GATE CA
90280

WHAT IS THE PLAN FOR THE ANIMAL LIFE THAT HAS
HABITATED WITHIN THE PROJECT SITE AREA?
I.E. : COYOTES, POSSUMS, SKUNKS, RATS AND FERAL CATS.
WILL THEY BE RELOCATED, EXTERMINATED OR
DISPERSED INTO THE SURROUNDING RESIDENTIAL AREA?

D30-1

RECEIVED

NOV 06 2019

PROJECT MANAGEMENT DIVISION II
DEPARTMENT OF PUBLIC WORKS

Please leave this form in the box provided or mail to **Cliff Stokes, Project Manager, County of Los Angeles Department of Public Works, 900 South Fremont Ave., 5th Floor, Alhambra, CA 91803**. This preaddressed form can simply be folded and placed in a mailbox.

Please remember to add postage.

You may also e-mail your comments to Cstokes@dpw.lacounty.gov.



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

PUBLIC MEETING FOR THE
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT



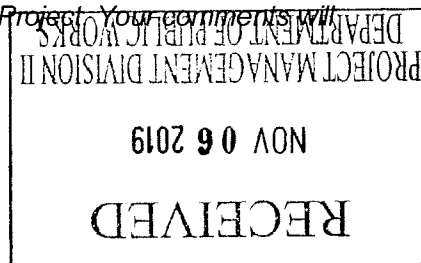
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Name: Jack Russell
Address: 12326 Richeon Ave.
Downey, CA 90242-3418
Ph: (562) 861-3187



Dear Mr. Stokes,

I've enclosed 3 pages of Donald Hodel's book, "Exceptional Trees of Los Angeles", published by the California Arboretum Foundation.

Hopefully, the people shepherding this project through to completion will do all in their power to preserve these beautiful trees.

Now Mr. Stokes, listen up, because this is of extreme importance: In order to deal with all the problems attendant with such a complicated project you are going to need some Starbucks coffee. I suggest setting up a camp chair with a cup holder, and enjoy your Starbucks coffee under the shade of the Moreton Bay Fig, as you contemplate how to save it.

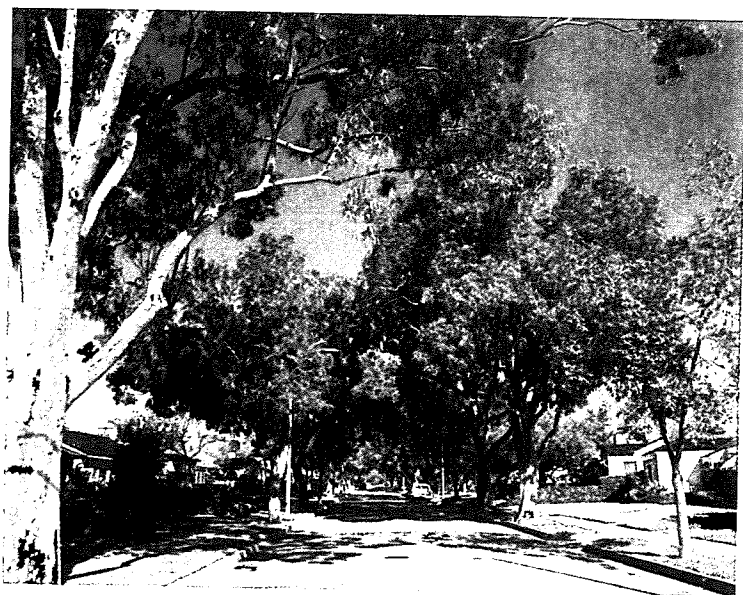
P.S. - I hope you weren't put off by Downey's former mayor Meredith Perkins, at the October 28th meeting. He is a bit of a rabble-rousing jerk!

Jack Russell

Please leave this form in the box provided or mail to **Cliff Stokes, Project Manager, County of Los Angeles Department of Public Works, 900 South Fremont Ave., 5th Floor, Alhambra, CA 91803**. This preaddressed form can simply be folded and placed in a mailbox.

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A striking parkway planting, gum myrtle is noted for its smooth trunk with bark peeling to reveal cream, rose, and mauve



Angophora costata.

PSM 2

GUM MYRTLE.

Angophora, about 8 species of trees native to eastern Australia, is named from the Greek words *agnos*, meaning jar or vessel, and *phoreo*, meaning bearing, referring to the trees' cup-like fruits. A close relative of *Eucalyptus*, gum myrtle is noted for its striking, smooth trunk with bark peeling to reveal irregular patches of cream, rose, and mauve. In Australia, aborigines used the bark and leaves to produce dyes. Gum myrtle is rare in the Los Angeles landscape. This striking parkway planting of 20 large trees is located in the 1500 block of Kenilworth Avenue in Pasadena.

PASADENA

(Not Pictured)

PSM 1

This exceptional planting of four handsome gum myrtle trees is at the entrance to the Annandale Country Club in Pasadena. One tree, more than 45 feet tall with a spread of 60 feet and a trunk nearly 12 feet around, is the largest of its kind in California.



Leaves of the bunya-bunya are flat, leathery, sharply pointed, overlapping, arranged in a spiral fashion

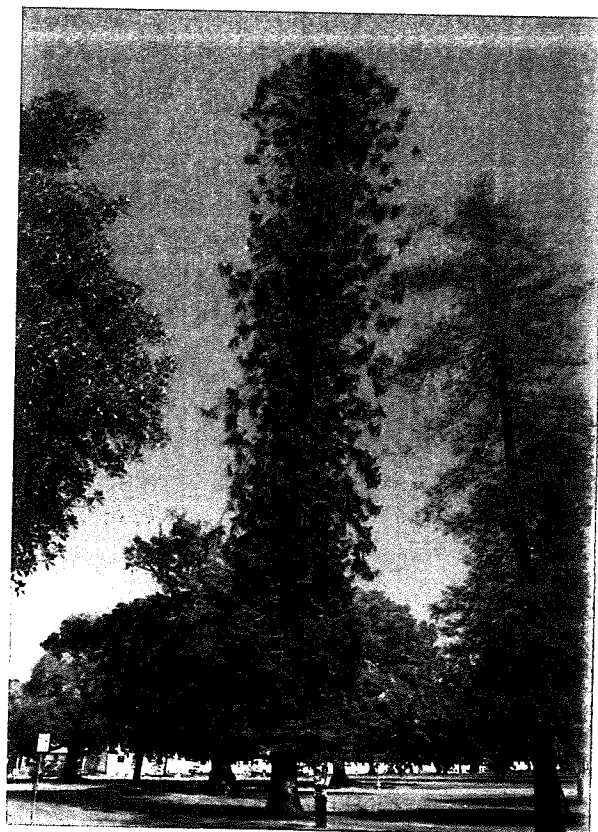
Araucaria bidwillii.

SE 2

BUNYA-BUNYA.

Araucaria is a group of about 18 species of cone-bearing trees native only to the Southern Hemisphere, from New Guinea to Australia, New Caledonia, New Zealand, and Chile in South America. The name is derived from Arauco Province in southern Chile. Evidence of their lengthy existence has been found in fossils 60 million years old. Located at Rancho Los Amigos Hospital in Downey, this notable specimen is more than 90 feet tall.

The bunya-bunya, native to the forests of Queensland in Australia, is a unique and peculiar conifer with glossy dark green, flat, leathery, sharply pointed, overlapping leaves arranged in a spiral fashion along the branches. The fruit of the bunya-bunya is a cone, the shape and size of a pineapple and weighing up to 10 pounds. It becomes a lethal object when falling from a tree. The large, flat seeds, called bunya nuts, require three years to mature in the cone and are an important source of food for aborigines as well as wallabies.



icus macrophylla.

MORETON BAY FIG.

SGV 21

The Moreton Bay fig is native to Queensland and northern New South Wales in Australia. There its 1-inch, globular, purple fruit are much sought after as food by bats, or flying foxes, as these winged mammals are popularly called. Of the dozen Moreton Bay fig trees designated as exceptional, this specimen located in Fig Tree Park at the corner of Colorado and Santa Fe Avenues in Glendora is the patriarch of them all. In fact, this specimen is the most massive cultivated tree in the greater Los Angeles area, surpassing an even more famous tree of the same kind at the railroad station in Santa Barbara. It is close to 100 years old and nearly 100 feet tall, spreads over more than 1/4 acre, and has a trunk that is an astounding 34 1/2 feet around. Like all other Moreton Bay figs, this specimen is noted for its massive buttressed roots, which spread for many feet out from the trunk.

WEST LOS ANGELES

W 36

This magnificent, spreading Moreton Bay fig specimen is located on the grounds of St. John's Church near the corner of National Boulevard and Military Avenue in west Los Angeles. More than 100 years old, it is a Historic-Cultural Monument of the City of Los Angeles.

SANTA MONICA

W 30

Another spreading giant, this Moreton Bay fig is situated attractively on the grounds of the Miramar Hotel on Ocean Avenue near Wilshire Boulevard in Santa Monica. It was planted in 1879 by the flamboyant, long-time Nevada senator, John Percival Jones, who had numerous financial dealings and land holdings in the Santa Monica area.

SANTA MONICA

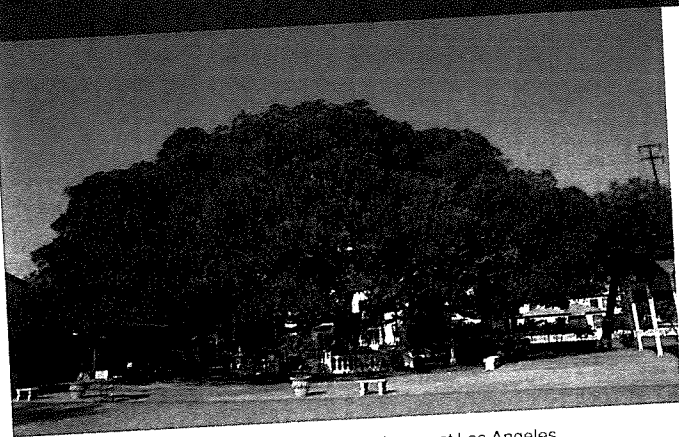
W 23

Planted in 1913 from a 2-pound coffee can by the Caldwell family, who are still the owners, this Moreton Bay fig tree with huge spreading buttresses is now a giant covering a large portion of the backyard of the 236 Adelaide Drive residence in Santa Monica. It is best viewed from the alley behind the house.

SANTA MONICA

W 32

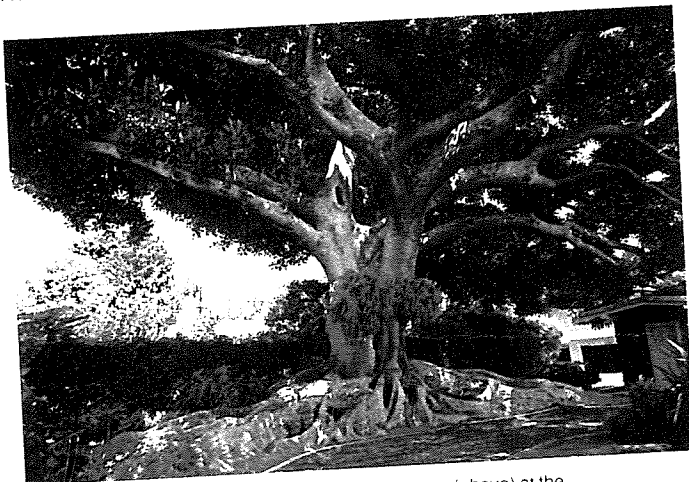
This parkway planting, a most unusual use for these trees considering their massive buttresses and surface rooting habit, is in the 1900-to-2600 blocks of La Mesa Drive in Santa Monica. Although not as massive as most of the other notable Moreton Bay figs, these trees



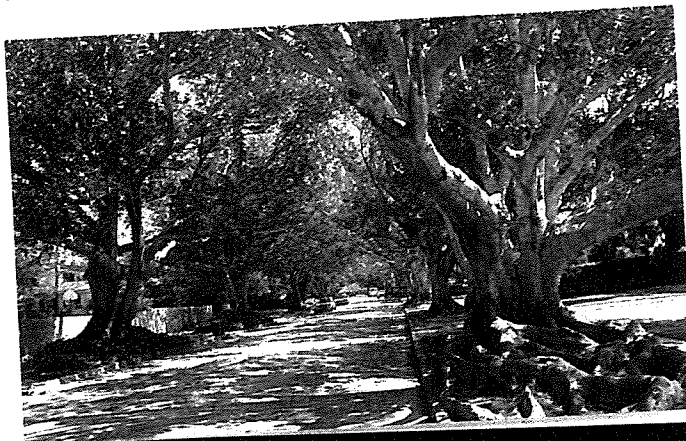
A large Moreton Bay fig is at St. John's Church in west Los Angeles



A Moreton Bay fig is situated attractively at the Miramar Hotel



Moreton Bay figs in Santa Monica. A large specimen (above) at the Caldwell residence, (below) along La Mesa Drive



(*Ficus macrophylla*, Moreton Bay fig continued)

are nevertheless large, well-maintained, and of superb conformation. The crowns of trees on both sides of La Mesa Drive intermingle over the center of the street creating a tunnel-like effect. The buttressed roots snaking their way 20 or 30 feet along a curb or sidewalk are an unusual sight.

OLVERA STREET

C 7

This group planting of Moreton Bay figs dates to the 1870s and is located in El Pueblo de Los Angeles State Historic Park around the old plaza near Olvera Street, formerly the town square. They are some of the first of their kind planted in California and the first trees planted in El Pueblo.

The Pueblo is the site of early Los Angeles where in 1781 44 "pobladores" acting on the orders of the King of Spain established a farming community in order to colonize this area of California. Since that time, Los Angeles has grown and developed into one of the world's largest metropolitan areas. The history of the area immediately surrounding El Pueblo reflects the heritage and contributions of the Hispanic, Black, Italian, French, Anglo, German, and Chinese immigrants to the growth and development of Los Angeles.

BEVERLY HILLS

W 8

Located in the forest of king palms in the Virginia Robinson Gardens in Beverly Hills, this Moreton Bay fig is exceptional due to the unusual and extensive root system that originates from its upper trunk and drops more than 20 feet through the air into the ground. These aerial roots are characteristic of some trees growing in damp, humid, shady, usually tropical environments. Their development in an arid, less tropical environment such as Southern California is a rare phenomenon.

DOWNEY

(Not Pictured)

SE 4

This impressive Moreton Bay fig, one of the largest of its kind in the county, is at Rancho Los Amigos Hospital in Downey.

LONG BEACH

S 1

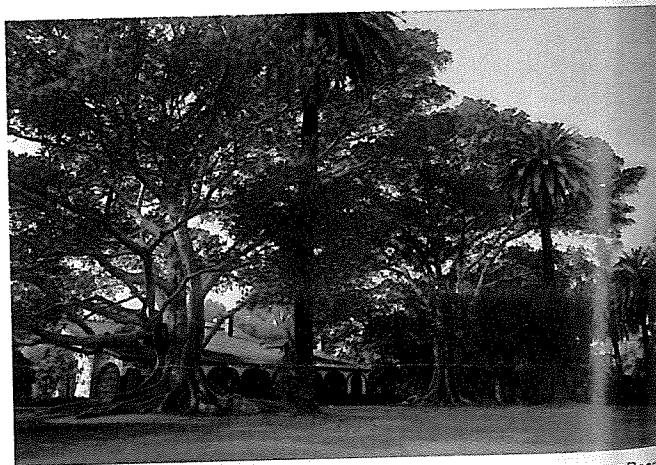
These two spreading Moreton Bay figs standing on either side of the front entrance to the ranch house at Rancho Los Alamitos in Long Beach were planted in the 1890s by Susan Bixby, wife of owner John Bixby. Bixby, a member of one of the more prominent of the early pioneering families in the Long Beach area, was the owner most responsible for the development of the Italian theme gardens surrounding the Rancho. The two trees dwarf the house, one of the few structures standing in California that has existed under the Spanish, Mexican, and American flags. The Rancho, originally part of the same 18th-century Spanish land grant that gave rise to Rancho Los Cerritos, was used primarily for sheep and cattle and in later years for agronomic crops.



A historic group of Moreton Bay figs is near Olvera Street.



This Moreton Bay fig in Beverly Hills has an unusual development of aerial roots.



Two Moreton Bay figs guard the ranch house at Rancho Los Alamitos, Long Beach.

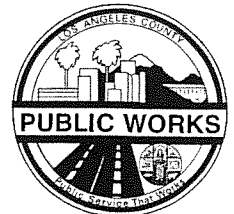


An atypical, wind-swept, flat crown and trunk with a long slit-like "window" characterize this Moreton Bay fig in Redondo Beach.





COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS



PUBLIC MEETING FOR THE
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT
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OCTOBER 28, 2019

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Name: LYNDA MAHAFFEY
Address: 7839 KINGBEE ST
DOWNNEY CA 90242

D32-1

My inquiry regards rodent removal before demolition such as: rats, skunks & possums. Indiscriminate use of rat poison can cause the death of pets such as dogs & cats. We already have rats running the cable & power lines as far north as three blocks.

RECEIVED

NOV 06 2019

PROJECT MANAGEMENT DIVISION II
DEPARTMENT OF PUBLIC WORKS

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Please remember to add postage.

You may also e-mail your comments to Cstokes@dpw.lacounty.gov.

Letter D33

Cliff Stokes (Consultant)

From: WALTER SEBRING <wsebring@gmail.com>
Sent: Thursday, November 7, 2019 3:57 PM
To: Cliff Stokes (Consultant)
Subject: Oppose demolition

CAUTION: External Email. Proceed Responsibly.

D33-1 _____
Why can't we save many of these buildings? Are you planning on using any of this massive piece of land to provide help to the homeless ? D33-2

Letter D34

Cliff Stokes (Consultant)

From: Erica Connelly <elconnelly@gmail.com>
Sent: Wednesday, November 13, 2019 10:33 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos Comments

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Stokes,

I would like to take this opportunity to voice my strong opposition to the demolition of the Rancho Los Amigos South Campus. I grew up in the City of Downey. My mother, brother, and uncle all attended school just across the street from the Rancho Los Amigos facilities at Meadow Park Elementary. We remember Rancho Los Amigos as a presence in our lives, not only in childhood, but into adulthood. For a time in college, my mother assisted patients in iron lungs at the polio clinic. Later, my grandfather spent a great deal of time at Rancho while rehabilitating from a stroke. The history and culture of Rancho Los Amigos are part of our community and our lives. I urge you to consider alternatives to the plan which stress preservation and re-use over demolition. Rancho Los Amigos has been part of Downey's history for more than 130 years. This is a chance to preserve that history.

Thank you,
Erica Connelly

D34-1

Letter D35

Cliff Stokes (Consultant)

From: Francesca Anne <faz654@gmail.com>
Sent: Wednesday, November 13, 2019 5:06 PM
To: Cliff Stokes (Consultant)
Subject: Rancho Los Amigos South Campus

CAUTION: External Email. Proceed Responsibly.

D35-1

Cliff Stokes,

I am writing to you in regards to the proposal to demolish Rancho Los Amigos. I urge you to consider restoration/preservation instead.

Historical and/or abandoned buildings have next to no protection from demolition, meaning we are demolishing our history without a second thought. Instead of leaving buildings to deteriorate and be demolished, we should be working to document and restore the history within America's ruins. There are countless communities and historic buildings across America, such as Gary, Indiana, and the historic Kirkbride asylums, that have become revitalized, or being rebuilt, with the help of historical preservation.

Historical buildings are a direct reflection of history. They help people today appreciate and respect a locations history. They bring past eras and traditions to light that may have been ignored or forgotten otherwise. They represent historical cultures and their habits. Additionally, these buildings help us distinguish changes in society. They help archaeologists better understand the reasons that cultures and societies developed. Buildings directly reflect the current era, and studying them teaches us about the history they have seen.

Historic preservation is a visual and tangible conservation of cultural identity. It gives community members an involvement in their surroundings design and construction and can tell us much about the cultures that created them and about the traditions and events from which our society grew. It connects people with their pasts and creates a future for communities. The preservation of historic buildings plays an important cultural role in cultivating pride of heritage and past making locations unique in the world. Preserved structures can often help create vibrant communities, bringing in tourism and events, which, in turn create economic growth.

The economic impact of historical preservation is substantial. Several studies have concluded that the preservation of historical buildings is directly linked to an increase of property values, the creation of more jobs, and revitalizing downtown areas by supporting local businesses. A study conducted by the Utah Heritage Foundation established that 7,313 jobs were created annually directly or indirectly by the heritage portion of Utah's tourism industry. In addition, 4,969 total jobs were created between 1990 and 2012 using federal or state historic tax credits, according to the report. A Colorado study highlights that every \$1 million spent on historic preservation in Colorado leads to \$1.03 million in additional spending, 14 new jobs, and \$636,700 in increased household incomes across the state. In addition, heritage tourism is a multi-billion dollar business. Heritage tourists' travels provide hundreds of millions of tax dollars, and billions for the hospitality and travel industries.

In today's day and age, environmental responsibility is becoming increasingly more important. Historical preservation is just one of the many ways society can take responsibility for our environment. On its most basic level, the practice of historic preservation is the practice of conserving resources. It is quite literally recycling. Demolition requires more energy and resources than preservation, so restoring buildings reduces construction waste. Resources already in place would be wasted and new raw resources would be put in its place. The production of new building materials requires materials, and these materials generate CO2 and other environmental hazards from the extraction, manufacture, transport, and disposal processes. Not only is this wasting resources, but it is also wasting energy and manpower. Although not employing the latest technology, many features in historic buildings were designed to save energy since they were designed before modern technology.

Los Angeles is a beautiful city with a rich history. Unfortunately, it is victim to the destruction of so much of its history. When our history is demolished, it is gone forever. We can never get our history back. Please don't be remembered as the one responsible for the eradication of the irreplaceable history in Rancho Los Amigos. Please consider restoring our historical buildings instead of erasing them forever.

Letter D36

Cliff Stokes (Consultant)

From: RENEE ACERO <R_ACERO@msn.com>
Sent: Tuesday, November 19, 2019 9:12 AM
To: Cliff Stokes (Consultant)
Subject: Rancho South Campus Project - Public Comment

CAUTION: External Email. Proceed Responsibly.

Mr. Stokes,

The following are just a few of my concerns regarding the Rancho South Campus Project:

D36-1

Traffic –Specifically on Gardendale, Paramount/Gardendale, Erickson/Gardendale. I know the County is leaving this mess up to the cities but that's irresponsible and wrong. To bring in literally thousands of cars to the area and not take some sort of financial responsibility at least is shameful!

D36-2

Speaking of traffic, it's ridiculous that the COUNTY has a housing development planned for the corner of Gardendale and Garfield of at least 100 units and did not take this project into consideration of the traffic, public services, public safety or anything else for that matter. In the entire 2,000 plus pages I don't recall seeing that project mentioned AT ALL.

D36-3

Aesthetic – I also think it's ridiculous to want to make these new buildings "ultra-modern buildings" when every other thing around this area, including some of the buildings that will be in the project area are NOT "ultra-modern". Why not keep in character with remaining historical buildings? It seems to me that your plan is to take over the area eventually and as Mr. Ivan said "do what you want".

D36-4

Public Safety – Your report states that "While CSB notes that law enforcement service requirements for the South Campus would increase upon Project buildout, it is likely that with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site." HOW do you figure!? We are constantly seeing an increase of homeless people and an increase in crime in our neighborhoods. I can guarantee that once this facility opens and people realize they have new area to "explore" they will definitely do so. If anything, especially with the increase in traffic, we'll need MORE patrols and security in this area!

D36-5

Basically I think it's deplorable that the County is dumping yet another one of its projects into our community without taking any responsibility for the mess it will create or taking any consideration for the actual needs of the residents. It's ironic that this whole project is being done under the guise of making County operations more efficient; I don't think the County could ever be efficient!

D36-6

Thank you,
Renee Acero
Hollydale, CA

Letter D37

Cliff Stokes (Consultant)

From: RENEE ACERO <r_acero@msn.com>
Sent: Tuesday, November 19, 2019 5:27 PM
To: Cliff Stokes (Consultant)
Subject: Re: Rancho South Campus Project - Public Comment

CAUTION: External Email. Proceed Responsibly.

D37-1

I'd like to add that the height of the parking structure is excessive! I know the report said "up to" but I don't see how or why it makes sense to build a 9 story parking structure when more and more South Gate and Downey are adding bike lanes and the MTA is planning TWO metro stops in our area because they AND the County, State keep preaching public transportation and planning TODs. Practice what you preach! Or, if you insist on providing all of this parking, at least make it so that these structures aren't so gigantic! You have plenty of space there, i'm sure it can be done!

From: RENEE ACERO
Sent: Tuesday, November 19, 2019 9:11 AM
To: CStokes@dpw.lacounty.gov <CStokes@dpw.lacounty.gov>
Subject: Rancho South Campus Project - Public Comment

Attachment A -
Provided as Letter D36

Mr. Stokes,

The following are just a few of my concerns regarding the Rancho South Campus Project:

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Speaking of traffic, it's ridiculous that the COUNTY has a housing development planned for the corner of Gardendale and Garfield of at least 100 units and did not take this project into consideration of the traffic, public services, public safety or anything else for that matter. In the entire 2,000 plus pages I don't recall seeing that project mentioned AT ALL.

Aesthetic – I also think it's ridiculous to want to make these new buildings "ultra-modern buildings" when every other thing around this area, including some of the buildings that will be in the project area are NOT "ultra-modern". Why not keep in character with remaining historical buildings? It seems to me that your plan is to take over the area eventually and as Mr. Ivan said "do what you want".

Public Safety – Your report states that "While CSB notes that law enforcement service requirements for the South Campus would increase upon Project buildout, it is likely that with the addition of new buildings and security features, there will be a decrease in the amount of CSB security needed across the Project Site." HOW do you figure!? We are constantly seeing an increase of homeless people and an increase in crime in our neighborhoods. I can guarantee that once this facility opens and people realize they have new area to "explore" they will definitely do so. If anything, especially with the increase in traffic, we'll need MORE patrols and security in this area!

Cliff Stokes (Consultant)

From: acero family <family_acero@yahoo.com>
Sent: Thursday, November 21, 2019 2:23 PM
To: Cliff Stokes (Consultant)
Subject: Rancho South Project

CAUTION: External Email. Proceed Responsibly.

Mr. Stokes,

The following are just a few of my concerns regarding the Rancho South Campus Project:

Traffic –The County is leaving this mess up to the cities but that's irresponsible and wrong. To bring in literally thousands of cars to the area and not take some sort of financial responsibility at least is shameful! It's also ridiculous that the COUNTY has a housing development planned for the corner of Gardendale and Garfield of at least 100 units and did not take this project into consideration of the traffic, public services, public safety or anything else for that matter. In the entire 2,000 plus pages I don't recall seeing that project mentioned AT ALL.

Aesthetic – I also think it's ridiculous to want to make these new buildings "ultra-modern buildings" when every other thing around this area, including some of the buildings that will be in the project area are NOT "ultra-modern". Why not keep in character with remaining historical buildings? It seems to me that your plan is to take over the area eventually and as Mr. Ivan said "do what you want".

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Also the height of the parking structure is excessive! I know the report said "up to" but I don't see how or why it makes sense to build a 9 story parking structure when more and more South Gate and Downey are adding bike lanes and the MTA is planning TWO metro stops in our area because they AND the County, State keep preaching public transportation and planning TODs. Practice what you preach! Or, if you insist on providing all of this parking, at least make it so that these structures aren't so gigantic! You have plenty of space there, i'm sure it can be done!

thank you,

Mario Acero

Hollydale, CA

D38-1

Letter D39

Cliff Stokes (Consultant)

From: W G <seapink2@gmail.com>
Sent: Thursday, November 21, 2019 9:40 PM
To: Cliff Stokes (Consultant); vanbreene@laconservancy.org
Subject: Fwd: SAVE RANCHO LOS AMIGOS

CAUTION: External Email. Proceed Responsibly.

Sorry, first message sent by mistake before signing. See below.

Dear Mr. Stokes,

It would be an enormous tragedy to lose Rancho Los Amigos. I implore you to oppose the demolition. The Rancho could be restored and adapted to serve the county's needs. A great example of a large adaptive reuse project is The Presidio in San Francisco (<https://www.presidio.gov/visit>) a former fort and army post built in the mid 1800s.

Another option - perhaps California State Parks would be interested in purchasing it and restoring it.

Alternatively, L.A. County is huge, so surely there are other possible sites for the new county buildings which don't require razing historic buildings.

Thank you for considering the loss of our history and opposing this disastrous proposal.

Sincerely,

Wendy Gish

D39-1

D39-2

D39-3

D39-4

Letter D40

Cliff Stokes (Consultant)

From: Sandra Perez <lachandy01@yahoo.com>
Sent: Friday, November 22, 2019 9:20 AM
To: Cliff Stokes (Consultant)
Subject: Rancho south campus public comment

CAUTION: External Email. Proceed Responsibly.

As a resident who live across from this site I am requesting my suggestions/comments:

1- PLEASE make ERICKSON a street that is closed after hours and on weekends. This was done years ago before it got closed permanently and it helped alleviate unnecessary traffic in my neighborhood. It was used as a shortcut to get to Imperial.

2- Since this is a county project, I demand the county issue special grant money to my city of South Gate to help with the traffic issues that my neighborhood and I will have to endure because of it.

3- I also implore that Consuelo become a four lane street that will allow two lanes in each direction for traffic to go in and out(There is sufficient space available for this) with a traffic light at Paramount (there are plenty of streets that have similar traffic lights back to back; Howery/Garfield- South Gate, Firestone/Jersey- Norwalk, Imperial/Reina- Downey). Please DO NOT dismiss this idea because it is so close to the traffic light at Gardendale/Paramount. It works for many other areas it will definitely work for this one!

4- I also implore that you keep the existing design of the area. I can not imagine 6-9 story buildings surrounding a residential community.

5- Since this area is at the very far end of Downey/South Gate/Paramount I implore a police substation which will help control any traffic/parking issues related to all these projects.

6- lastly I remind you about all the other projects that will also be taking place in this immediate area: PATH 60 unit homeless facility on Imperial/Garfield, 100 unit "veterans" homeless facility at Gardendale/Garfield, Metro station at Industrial/Gardendale and at Century/Center, 244 apt complex at Imperial/Garfield and the \$10M+ Downey sports complex adjacent to your rancho project be taken into consideration when finalizing your final draft of this project and taking community input.

Again I live across from Gardendale, based on you parking study I live in 5 of the major intersections that received a failing grade so please do not dismiss my suggestions as my quality of live will greatly be affected by all of these projects. Have pity on me and my neighbors, we are invested in this community and do not have the resources to sale our properties and move elsewhere. We are forced to stay to endure all these changes that are being shoved on us. Our comments should be taken extremely seriously.

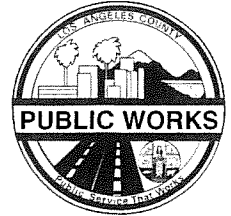
Thank you
Sandra Pérez

Sent from my iPhone



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

PUBLIC MEETING FOR THE
RANCHO LOS AMIGOS SOUTH CAMPUS PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT



OCTOBER 28, 2019

Written Comment Form

The purpose of the public meeting is to solicit comments from the interested parties and the public regarding the Draft Environmental Impact Report (EIR)'s analysis for the Rancho Los Amigos South Campus Project (the "Project"). The Project would develop new County administrative buildings on the South Campus, including the Internal Services Department Headquarters, Probation Department Headquarters, and a County Office Building. The Project would also include the development of two parking structures for employees and visitors. The Project would include all necessary utilities and points of connection, roadways, curbs and gutters, sidewalks, medians, site structures, hydrants, vaults, manholes, substations, street lights, street signage, landscaping, and irrigation for the proposed new development. The Project would also include the off-site improvements, such as those required for utilities. The Project would develop a total square footage up to 650,000 square feet, and require demolition of existing buildings and structures throughout the South Campus.

Comments will only be accepted in written form. The deadline for submitting written comments to the County is **November 22, 2019**. In the space below (use additional pages if necessary), please provide any written comments you may have concerning the analysis provided in the Draft EIR for the Project. Your comments will then be considered and addressed in the Final EIR.

Name:

RON & JENNIFER BOREN

Address:

7915 Lyndora St.

Downey, CA

90242

To Whom It May Concern,

As the proposed project at Rancho Los Amigos South Campus currently stands, we are OPPOSED due to its unsustainability and the fact that it's out of character for the surrounding area and neighborhoods.

Please see the additional sheet of paper for a more detailed explanation of our opposition to this proposal.

Sincerely, Ron and Jennifer Boren

D41-1

Please leave this form in the box provided or mail to **Cliff Stokes, Project Manager, County of Los Angeles Department of Public Works, 900 South Fremont Ave., 5th Floor, Alhambra, CA 91803**. This preaddressed form can simply be folded and placed in a mailbox.

Please remember to add postage.

You may also e-mail your comments to Cstokes@dpw.lacounty.gov.

To Mr. Stokes or To Whom It May Concern,

We are writing to express our concerns regarding the proposed development for the Rancho Los Amigos South Campus. As currently proposed, the project for the South Campus is unsustainable and out of character for the surrounding area and neighborhoods.

D41-2

When this project is built-out, the county is estimating that nearly 3000 people will work at the South Campus. Currently, nearly every intersection in the surrounding area is near or at capacity regarding vehicle traffic, particularly during the prime commute times. The intersection of Imperial Highway and Paramount Boulevard backs up a distance of several blocks, in all directions, particularly during "prime time." Adding several hundred, possibly a couple of thousand vehicles to the surrounding streets would create absolute gridlock! Even though Metro is proposing a train station on the southwest portion of the property, realistically this would do little to alleviate the traffic because only a small percentage of campus employees will actually ride the train.

D41-3

The county property is surrounded primarily by single story homes, with a few exceptions such as the Downey Courthouse. Constructing a nine story parking garage would be completely out of character for the surrounding area.

D41-4

Presently, this property is utilized by residents from nearby neighborhoods for dog walking, jogging, biking and other forms of exercise because the property provides a relatively traffic-free environment. It would be nice if the project could include more walking/biking trails as well as a community garden area and general open-space for the community to enjoy. Open-space is hard to find in the Southeast Los Angeles area and would be much more beneficial to the local residents as opposed to several soccer fields, which will draw even more traffic to this area as most of the people likely to utilize these fields will be from other areas. In addition, soccer games are often noisy and will add "light pollution" due to the fact that games are often played late into the night.

D41-5

D41-6

For these reasons, we are opposed to this project as it is currently proposed>

D41-7

Signed,



Ronald and Jennifer Boren

7915 Lyndora Street

Downey, CA 90242