



February 19, 2014

Aldo E. Schindler, Director of Community Development
City of Whittier,
13230 Penn Street, 2nd Floor
Whittier, California 90602

Submitted Electronically

Email: aschindler@cityofwhittier.org

RE: NOP LINCOLN SPECIFIC PLAN (FRED C. NELLES YCF)

Dear Mr. Schindler,

The California Preservation Foundation (CPF) is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

Our primary concern is that the DEIR must include a thorough analysis of the Fred C. Nelles Youth Correctional Facility. The Nelles YCF is designated California Landmark #947. According to a study completed in 2005 by Page & Turnbull, the site consists of 8 buildings and 2 sites contribute to the historic significance of the site. Six of the eight buildings "appear to be eligible for individual listing on the National Register".

There is no question that the site is a historic resource for purposes of CEQA. The Initial Study acknowledges that the demolition of six of the eight buildings could cause a substantial adverse change to a historic resource. The DEIR must contain a meaningful historic preservation alternative, including adaptive reuse of the structures, to attempt to mitigate this impact to a level of less than significant.

Please notify CPF of any future actions on this project. You may email information to cheitzman@californiapreservation.org. Please feel free to contact me at (415) 495-0349 if you have any questions or concerns.

Sincerely,

Cindy Heitzman
Executive Director

5 3RD STREET, SUITE 424
SAN FRANCISCO, CALIFORNIA
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CINDY HEITZMAN

cc: Helen Rahder, Whittier Conservancy, P.O. Box 9114, Whittier, CA 90608-9114



December 1, 2014

Conal McNamara, Director of Community Development
City of Whittier,
13230 Penn Street, 2nd Floor
Whittier, California 90602

Submitted Electronically

Email: cmcnamara@cityofwhittier.org

**RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) LINCOLN SPECIFIC PLAN
(FRED C. NELLES YCF)**

Dear Mr. McNamara,

On behalf of the California Preservation Foundation, I am submitting comments on the referenced project. The California Preservation Foundation (CPF) is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

The CPF provided comments to you regarding the need to conduct a thorough analysis of the Fred C. Nelles Youth Correctional Facility (California Landmark #947). In that letter, we referenced a 2005 report by Page and Turnbull that concluded that eight buildings and two sites are contribute to the historic significance of the site. Of the eight buildings, six appear to be eligible for individual listing on the National Register. This was further confirmed and documented by GPA, consultants hired by the City of Whittier.

The significance of these sites is well documented and the requirements under CEQA compel the lead agency to analyze alternatives to the proposed project that would not cause significant irreversible impacts to the environment. This was emphasized in our letter from February 2014 when six of the eight buildings were identified for demolition: "The DEIR must contain a meaningful historic preservation alternative, including adaptive reuse of the structures, to attempt to mitigate this impact to a level of less than significant".

There is a preponderance of evidence which identifies the historic resources under CEQA, yet the proposal to reduce impacts to the historic resources to a level of less than significant includes demolition of six out of ten identified resources, with a detailed plan for documentation, distribution and interpretive exhibits of the site and demolished buildings. The basis for this determination is based on infeasibility due to increased costs.

The DEIR does not state why the "document and demolish" mitigation measures serves the interest protected by CEQA. Project consultants have documented projected rehabilitation costs, but have not stated why the retention and rehabilitation of the structures is infeasible. The determination that the project is infeasible is not consistent with CEQA Guidelines, which has mandatory – not permissive--language. CEQA Guideline, section 15126.6 (b) requires that "the discussion of alternatives shall focus on alternatives to the project or its location which are

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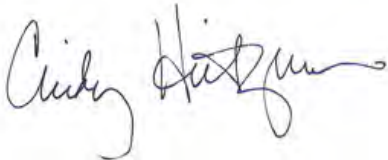
EXECUTIVE DIRECTOR
Cindy L. Heitzman

capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

We strongly encourage the project applicant and the City of Whittier to present a plan that includes the adaptive reuse of all historic buildings, incorporate the State Historical Building Code to use alternatives to the prevailing codes and comply with the Secretary of the Interior's Standards for Rehabilitation. Until that is done, our position is that same now as it was in February 2014 -- the DEIR must contain a range of meaningful historic preservation alternatives, including adaptive reuse of the structures, to mitigate this impact to a level of less than significant.

Please notify CPF of any future actions on this project. You may email information to cheitzman@californiapreservation.org. Please feel free to contact me at (415) 495-0349 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Cindy Heitzman". The signature is written in a cursive, flowing style.

Cindy Heitzman
Executive Director

cc: Helen Rahder, Whittier Conservancy, P.O. Box 9114, Whittier, CA 90608-9114