

From: Ben Loescher <bloescher@lma.la>
Date: April 6, 2020 at 4:38:55 PM PDT
To: jpaul@escondido.org
Subject: ENV 19-0007

Dear Mr. Paul,

I am writing to urge the City of Escondido to reject the proposed Mitigated Negative Declaration for the project at 2608 S. Escondido Boulevard. As you are no doubt aware, the site is currently occupied by the Paxton Adobe which is a regionally significant structure both architecturally and historically. Escondido is unique in Southern California for its quantity and quality of mid-century adobe buildings, and this structure is a particularly important contributor for its association with Charles Paxton who fabricated the adobes and participated in the construction of many of these buildings.

Because of the importance of this resource, the impact that the proposed demolition of this structure is not mitigated in any sense, and it is evident from the document that the applicants have made no attempt to study alternatives that would obviate destruction of the structure. Please consider the following:

- Contrary to the NOI, the project as proposed will have a significant aesthetic impact on the environment as a notable architectural building will be replaced with a unremarkable and generic residential complex for which it appears no design effort has been made except to maximize floor area. It will significantly detract from the aesthetic experience of the area.
- The proposed MND incorrectly indicates that "less than significant" impact would be made to Cultural Resources by the proposed project, mostly based on the finding that seismic improvement is infeasible. This conclusion is not warranted and needs to be made by a structural engineer who routinely works on adobe buildings. Significant work has been made in the last twenty years on techniques for seismic stabilization of adobe buildings not requiring the addition of rebar or impact on historically contributing fabric (most notably by the [Getty's Seismic Adobe Project](#)) which are not addressed here. A qualified structural engineer with demonstrated experience using current best practices for improving the seismic performance of earthen buildings should be engaged to evaluate the structure.

Please do not hesitate to contact me if you have any questions,

Best,

Ben

Ben Loescher AIA | LEED AP
p: 310-745-9211
e: bloescher@lma.la



Loescher + Meachem Architects, Inc.
353 S. Broadway, #201, Los Angeles, CA 90013
www.lma.la