



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

Notice of Preparation

April 14, 2010

To: Reviewing Agencies

Re: Occidental College Swan Hall Addition and Renovation, Occidental College
SCH# 2010041044

Attached for your review and comment is the Notice of Preparation (NOP) for the Occidental College Swan Hall Addition and Renovation, Occidental College draft. Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Diana Kitching
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

fm
Scott Morgan
Acting Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2010041044
Project Title Occidental College Swan Hall Addition and Renovation, Occidental College
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description The Applicant, Occidental College, is proposing to renovate the 16,340 square foot (sq ft) three-story Swan Hall and construct a 22,700 sq ft 3-story addition. (No change in student or faculty population is anticipated as a result of the project) Originally designed by Myron Hunt as a dormitory for the original campus, Swan Hall was constructed in 1914 and remodeled and repurposed in 1960 as a faculty office building. The building is a contributory structure to an identified Historic District. Today, Swan Hall houses six academic departments and one third of Occidental's faculty. The renovation of Swan Hall would provide necessary seismic upgrade and provide full ADA-compliant accessibility. Currently, most of the building is inaccessible to the physically challenged. The existing office space is substandard; the renovation would provide modern offices of adequate size for existing faculty and staff, along with seminar rooms, flexible instruction areas, informal meeting spaces, and new psychology experiment and interview rooms. The proposed addition would incorporate a design scale similar to, but distinct from, the original Swan Hall. The expansion would allow for modern offices and other spaces of adequate size for existing faculty and staff. During the renovation of Swan Hall and the construction of the new 3-story addition, the offices of faculty and staff in existing Swan Hall would be relocated into temporary trailers in order that the academic and administrative functions of the College continue uninterrupted. Approximately 12,762 square feet of temporary trailer space would be used during construction activities. The project would require Conditional Use approval for an educational use in a residential zone.

Lead Agency Contact

Name Diana Kitching
Agency City of Los Angeles
Phone 213-978-1351 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Eagle Rock Boulevard and York Boulevard
Lat / Long
Parcel No. 5476-001-003
Township **Range** **Section** **Base**

Proximity to:

Highways 134 and 2
Airports
Railways
Waterways
Schools
Land Use Occidental College Campus/R-1/Low Density Residential

Project Issues Aesthetic/Visual; Archaeologic-Historic

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report
State Clearinghouse Data Base

Date Received 04/14/2010

Start of Review 04/14/2010

End of Review 05/13/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Game Region 1E Laurie Harnsberger	<input type="checkbox"/> Native American Heritage Comm.	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Boating & Waterways Mike Sotelo	<input type="checkbox"/> Fish & Game Region 2 Jeff Drongesen	<input type="checkbox"/> Debbie Treadway	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Fish & Game Region 3 Charles Armor	<input type="checkbox"/> Public Utilities Commission Leo Wong	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Colorado River Board Gerald R. Zimmerman	<input type="checkbox"/> Fish & Game Region 4 Julie Vance	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Conservation Rebecca Salazar	<input type="checkbox"/> Fish & Game Region 5 Don Chadwick	<input type="checkbox"/> State Lands Commission Marina Brand	<input type="checkbox"/> Caltrans, District 12 Chris Herre	<input checked="" type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Fish & Game Region 6 Gabriela Gatchel	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 5S Central Valley Region (5)	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Cal Fire Allen Robertson	<input type="checkbox"/> Dept. of Fish & Game M George Isaac Marine Region	<input type="checkbox"/> Cal EPA	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> Central Valley Flood Protection Board James Herola	<input type="checkbox"/> Other Departments	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> Office of Historic Preservation Wayne Donaldson	<input type="checkbox"/> Food & Agriculture Steve Shaffer	<input type="checkbox"/> Airport Projects Jim Lerner	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Dept. of Food and Agriculture	<input type="checkbox"/> Transportation Projects Douglas Ito	<input type="checkbox"/> RWQCB 9 San Diego Region (9)	<input type="checkbox"/> Other
<input type="checkbox"/> California Department of Resources, Recycling & Recovery Sue O'Leary	<input type="checkbox"/> Dept. of General Services Public School Construction	<input type="checkbox"/> Industrial Projects Mike Tollstrup		
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam	<input type="checkbox"/> Dept. of General Services Environmental Services Section	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance		
<input type="checkbox"/> Dept. of Water Resources Resources Agency Nadell Gayou	<input type="checkbox"/> Dept. of Public Health Bridgette Binning	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality		
<input type="checkbox"/> Conservancy	<input type="checkbox"/> Dept. of Health/Drinking Water	<input type="checkbox"/> State Water Resources Control Board Steven Herrera Division of Water Rights		
<input type="checkbox"/> Fish and Game	<input type="checkbox"/> Independent Commissions/Boards	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center		
<input type="checkbox"/> Dept. of Fish & Game Scott Flint Environmental Services Division	<input type="checkbox"/> Delta Protection Commission Linda Flack	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator		
<input type="checkbox"/> Fish & Game Region 1 Donald Koch	<input type="checkbox"/> Cal EMA (Emergency Management Agency) Dennis Castrillo			
	<input type="checkbox"/> Governor's Office of Planning & Research State Clearinghouse			

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



May 6, 2010

Ms. Diana Kitching

CITY OF LOS ANGELES

200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: SCH#2010041044 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Occidental College Swan Hall Addition and Renovation Project located in the Eagle Rock Area of the City of Los Angeles; Los Angeles County, California

Dear Ms. Kitching:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within the APE. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et se*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

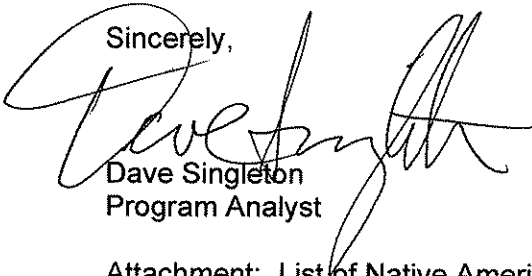
Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or

medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", written over the typed name and title.

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
May 6, 2010
Los Angeles County

Charles Cooke
32835 Santiago Road
Acton , CA 93510

(661) 733-1812 - cell
suscol@intox.net

Chumash
Fernandeno
Tataviam
Kitanemuk

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez
981 N. Virginia
Covina , CA 91722
(626) 339-6785

Yowlumne
Kitanemuk

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Fernandeño

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall , CA 91322
tsen2u@hotmail.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax

Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

Fernandeno Tataviam Band of Mission Indians
William Gonzales, Cultural/Environ Depart
601 South Brand Boulevard, Suite 102
San Fernando CA 91340
rortega@tataviam-nsn.us
(818) 837-0794 Office
(818) 581-9293 Cell
(818) 837-0796 Fax

Fernandeno
Tataviam

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
(626) 286-1262 -FAX
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino Tongva

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th Street, Rm.
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Randy Guzman - Folkes
655 Los Angeles Avenue, Unit E
Moorpark , CA 93021
ndnRandy@gmail.com
(805) 905-1675 - cell

Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010041044; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Swan Hall Renovation and Addition, Occidental College; located in the Eagle Rock Area of northeast Los Angeles; City of Los

Native American Contacts
May 6, 2010
Los Angeles County

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908
Los Angeles , CA 90086
samdunlap@earthlink.net

Gabrielino Tongva

(909) 262-9351 - cell

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010041044; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Swan Hall Renovation and Addition, Occidental College; located in the Eagle Rock Area of northeast Los Angeles; City of Los



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

April 23, 2010

Ms. Diana Kitching
Environmental Review Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

APR 30 2010

ENVIRONMENTAL
UNIT

Dear Ms. Kitching:

Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Swan Hall Renovation and Addition, Occidental College Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Electronic files include spreadsheets, database files, input files, output files, etc., and does not mean Adobe PDF files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.urbemis.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address:
http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

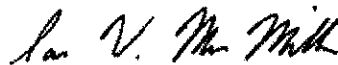
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM

LAC100414-01

Control Number

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

April 29, 2010

To: Los Angeles Department of City Planning
Environmental Review Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Attn: Adam Villani

From: John Dallas, Inspector II,
Hydrants & Access Unit, Los Angeles Fire Department
221 N. Figueroa St. Los Angeles, CA 90012

Subject: Swan Hall Renovation and Addition

PROJECT LOCATION

1600 Campus Road, Los Angeles, CA 90041 (ENV-2010-0653-EIR)

PROJECT DESCRIPTION

Renovation of existing building, (Swan Hall) 16,340 Sq. Feet, (3 stories); Joined by a 22,700 Sq. feet addition (also 3 stories).

The following items are of major concern to this Department and should be included in the Final Environmental Impact Report:

A. Fire Flow

The following comments are furnished in response to your request for this Department to review the proposed development:

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low density residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 2000 G.P.M. from 2 fire hydrants flowing simultaneously.

B. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. Engine 55
4455 E. York Bl.
Miles-0.4
Staff- 7

Fire Station No. Engine 42
2021 Colorado Bl.
Miles-1.1
Staff-6

Fire Station No. Task Force 50
3036 Fletcher Dr.
Miles- 1.8
Staff- 14

The above distances were computed to 1600 Campus Rd.

C. Firefighting Personnel Access

From Eagle Rock Blvd. And York Blvd. To Alumni Ave. and Campus Rd.
This project will not have a major impact on firefighting operations in the Eagle Rock Area.

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector John Dallas of the Construction Services Unit at (213) 482-6509

MILLAGE PEAKS
Fire Chief



C.A Fry, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

CAF:JD:tpd

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: April 28, 2010

TO: Diana Kitching, Planning Assistant
Environmental Review Section
Department of City Planning

RECEIVED
CITY OF LOS ANGELES

MAY 07 2010

ENVIRONMENTAL
UNIT

FROM: 
Brent Lorscheider, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Occidental College - Swan Hall Renovation and Addition – Notice of Preparation EIR**

This is in response to your April 14, 2010 letter requesting a review of your proposed project. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Swan Hall	150 GPD/1000 SQ.FT	16,340 SQ.FT	(2,451)
Proposed			
Swan Hall	150 GPD/1000 SQ.FT	16,340 SQ.FT	2,451
Addition	150 GPD/1000 SQ.FT	22,700 SQ.FT	3,405
Total			3,405

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes three existing 8-inch lines and an existing 6-inch line on Campus Rd. The sewage from the existing 6-inch line and 8-inch line connect and feed into an 8-inch line on York Blvd. The sewage from the other existing 8-inch lines connect and feed into an 8-inch line on Eagle Rock Blvd. The flows from all lines then connect at the York Blvd before splitting and discharging into an 18-inch line and the 42-inch line on Eagle Rock Blvd.

Based on our existing gauging information, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Campus Rd	*	1.04 MGD
8	Campus Rd	*	261,468 GPD
8	Campus Rd	*	369,772 GPD
6	Campus Rd	*	359,525 GPD
8	York Blvd	60	447,032 GPD
8	Eagle Rock Blvd	34	491,842 GPD
18	Eagle Rock Blvd	34	1.26 MGD
42	Eagle Rock Blvd	35	16.53 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

cc: Meher Irani, BOS
Daniel Hackney, BOS
Rowena Lau, BOS

TERA



THE EAGLE ROCK ASSOCIATION

Invest in your community

May 8, 2010

RECEIVED
CITY OF LOS ANGELES

MAY 14 2010

ENVIRONMENTAL
UNIT

Diana Kitching
Environmental Review Coordinator
City of Los Angeles
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

Re: Written Response to Notice of preparation (NOP) for Proposed Project Swan Hall renovation and addition, Occidental College 1600 Campus Road, Los Angeles CA 90041- ENV- 2010-653-EAF

Dear Ms Kitching,

The Eagle Rock Association (TERA) thanks you for the opportunity to review the *Notice of Preparation*, dated April 14, 2010 for the Proposed Renovation and Addition to Swan Hall. Occidental College has been an important part of the Eagle Rock community since 1910, when the college trustees elected to move their campus here from neighboring Highland Park, and hired renowned architect Myron Hunt to design the campus. We concur with the statement in the *Notice of Preparation* that Swan Hall, constructed in 1914, is a contributing structure to an identified Historic District and as such is a "historical resource", requiring that the proposed project subject to evaluation under California Environmental Quality Act. However, since Swan Hall was one of the first four campus buildings designed by Hunt for the new location and that its construction as the first residence hall served to complete the establishment of a fully functioning college sited on the Main Quadrangle, which served as the nucleus of the campus, the NOP should consider the fact that Swan Hall may also be individually eligible for listing on the California Register.

Over the passed two years our organization has worked with the college on a proposed Specific Plan. While that plan application was recently withdrawn, the document stated that any work on Myron Hunt designed buildings would be accomplished through the process of "adaptive reuse" that "adapts existing buildings for new uses while retaining the historic features of Myron Hunt's original buildings, plazas, and landscaped areas. Adaptive Reuse shall be preformed in accordance with the Secretary of Interior Standards for Rehabilitation, (Department of Interior regulation 36CFR Part 67, Historic Preservation Certification).

May 8, 2010
Diana Kitching

Secretary of Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings by Weeks and Grimmer defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions of features which convey its historical, cultural, or architectural values."

The project description in the NOP states that the renovation of Swan Hall would provide necessary seismic upgrades and full ADA-compliant accessibility. The renovation will provide modern offices of adequate size for existing faculty and staff, along with seminar rooms, flexible instruction areas, informational meeting spaces, and new psychology experiment and interview rooms. The proposed addition would incorporate a design and scale similar to, but distinct from the original Swan Hall. The expansion would allow for modern offices and other spaces of adequate size for existing faculty and staff. Such a project would appear to be one that if executed correctly could be completed consistent with the Standard's and as stated in the State Guidelines (*CEQA (14 CCR Section 15331)*) would qualify for an exemption under CEQA.

However, what is not clear from the project description in the NOP is that, as described at the March 17, 2010 meeting with College representative at TERA's Preservation, Planning and Development Committee, the work would include the demolition of most interior spaces and materials, the stripping of all exterior finishes and that the addition will not only be significantly taller and larger than the original building but will reorient the building entrance away from the historic Main Quadrangle.

Based on the information in the NOP, it is difficult to understand the full extent of what is currently being proposed by this project. The exterior has retained high integrity but the interior has been highly altered. Our concern is that what is being proposed is the demolition of the only remaining historic fabric left intact and a new addition that will result in the subordination of the historic building.

We are aware that design professionals sensitive to the issues of historic preservation have addressed similar programmatic needs in other buildings that have resulted in rehabilitated historic structures that both meet the Secretary of the Interior's Standards and are cost effective. We feel there are different optional approaches to meet the building program and the goals and objectives of the College.

May 8, 2010
Diana Kitching

As we have previously expressed to representatives of the College, the areas of concern that need to be addressed are:

1. Preservation of the building's exterior materials in a manner that still achieves safety and seismic retrofitting goals.
2. The orientation of the main entrance should remain from the "quad" or courtyard with the three original doors remaining open and functional
3. Connection of the new addition to the historic structure is a great concern
4. Size, location and massing of the new addition in relationship and proportion to the historic structure
5. Height of the new addition should not be higher than the historic structure

Furthermore, we would prefer that the applicant not spend money and time on what should be an unnecessary EIR process. We feel it would be preferable to modify the proposed project, after completing the appropriate analysis, to a design that would fully comply with the Secretary of the Interior's Standards for Rehabilitation and qualify for an exemption from an EIR; or proceed with a Mitigated Negative Declaration with mitigation that requires project compliance with the Standard's. However, if an EIR is the option being pursued, then in addition to the issues raised above, we also request that a project design that would fully comply with the Rehabilitation Standards be addressed as a project alternative in the EIR document.

Sincerely,



Robert Gotham
President, The Eagle Rock Association

cc: Councilmember Jose Huizar
Jonathan Veitch, President, Occidental College



Eagle Rock Valley Historical Society

RECEIVED
CITY OF LOS ANGELES

MAY 14 2010

ENVIRONMENTAL
UNIT

Diana Kitching, Environmental Review Coordinator
Department of City Planning
200 N. Spring St. Room 750
Los Angeles, CA 90012

EAF NO.: ENV-2010-0653-EIR
PROJECT NAME: Swan Hall Renovation and Addition, Occidental College
PROJECT LOCATION ADDRESS 1600 Campus Rd., Los Angeles CA 90041
COMMUNITY PLANNING AREA: Northeast Los Angeles
COUNCIL DISTRICT 14

5/12/11

Ladies and Gentlemen,

While we appreciate Occidental College's willingness to undergo environmental review on this project, we are concerned that this notice proposes a lower standard of review than the building merits.

The notice asks that the structure be considered as a "contributory structure to an identified historic district". Although we agree with the sentiment expressed, as we understand it neither the area of Occidental's Campus nor any of its historic resources has been identified or subject to historic review by any public agency. The college has resisted such consideration or designation for many years.

Swan Hall was one of the first three buildings erected on the then new Occidental College campus. Swan, Johnson and Fowler Halls defined the look of the campus and its plan's relation to the topography of the site. The interiors of all three buildings have been modified in the postwar years, all without formal review of their historic status or integrity as a resource. As it happens the unusual nature of Swan Hall's multilevel floor plan has preserved, for better and worse, much of the interior structural fabric of the building along with nearly all of its exterior fabric and detailing.

We urge that the environmental impact of the reuse of this particular building be reviewed using the Secretary of the Interior's standards for restoration or adaptive reuse. The proper and sensitive reuse of this building can provide the campus with a link to the character and individuality of its history, if its integrity and character are respected.

Sincerely,



Eric Warren, President
Eagle Rock Valley Historical Society
1017 Glen Arbor Ave.
Los Angeles, CA 90041
323-257-1357
erickaren@earthlink.net



P.O. Box 50894
Los Angeles, CA 90050-0894
(323) 256-4326 www.hpht.org

President:
Carmela Gomes

April 26, 2010

Via Email & Mail
Diana.Kitching@lacity.org

Vice President:
Justine Leong

Ms. Diana Kitching, Environmental Review Coordinator
Department of City Planning
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Secretary:
Tina Gulotta

Treasurer:
Charly Kemp

**Re: Written Response to NOP/Initial Study for
Proposed Project (James Swan Hall, Occidental
College) – EAF NO.: ENV- 2010-0653-EIR for CPC-2010-
0652-CU**

Board of Directors:

Susan Adams
Steve Crouch
Charles Fisher
Gemma Marquez
John Nese
Linda Phelps
Nicole Possert
Chris Smith
Robert Spira
Anne Marie Wosniak

Dear Ms. Kitching,

The Highland Park Heritage Trust has reviewed the NOP,
dated April 14, 2010 for the Proposed Project.

Our organization applauds Occidental College and the City of
Los Angeles for recognizing Swan Hall as a historic resource
under CEQA as a contributing structure to an identified
historic district.

As one of the local historic preservation organizations in
Northeast Los Angeles, we are always most interested in
doing it right from the outset. We'd much rather see the
applicant spend its precious financial resources correctly and
not waste its money and time on what should be an
unnecessary EIR process. We'd much prefer that the
applicant modify the proposed project, after completing the
appropriate analysis, to a design that would fully comply with
the Secretary of the Interior's Standards for Rehabilitation
and under **Section 544.1**, provide an exemption from an EIR
and proceed with a Mitigated Negative Declaration for this
project. It benefits no one to go down this EIR path when
those resources should instead be invested into Swan Hall's
preservation.

At our last meeting on April 12, 2010, the proposed project
architect, Brian Bloom, stated that the project followed and
met the Rehabilitation Standards. Yet the proposed project is

undergoing an EIR process because it currently does not meet the Standards.

Based on the information provided to the public, it is difficult to understand the full extent of what is being proposed by this project. The exterior has retained high integrity but the interior has been highly altered. Yet what is being proposed is to demolish the only remaining historic fabric left intact.

We feel there are different optional approaches to meet the building program and the goals and objectives of the College. Here are the areas of concern that need to be addressed:

1. Preservation of the building's exterior materials in a manner that still achieves safety and seismic retrofitting goals.
2. The orientation of the main entrance should remain from the "quad" or courtyard with the three original doors remaining open and functional
3. Connection of the new addition to the historic structure is a great concern
4. Size, location and massing of the new addition in relationship and proportion to the historic structure
5. Height of the new addition should not be higher than the historic structure

So, if the applicant is not interested in saving time and potentially money overall by stopping this process for a project redesign that would fully comply with the Rehabilitation Standards, we submit the above concerns and ask that the City include these as project alternatives and in the EIR analysis.

Thank you for the opportunity to provide input and comments to assist in the development of an EIR.

Sincerely,

Carmela Gomes
President

cc: Councilmember Jose Huizar

Michael & Lucille Arson, 3720 S. Thistle, Seattle WA 98118 206 723-1006 phone & fax

April 21, 2010

RECEIVED
CITY OF LOS ANGELES

APR 23 2010

ENVIRONMENTAL
UNIT

Ms. Diana Kitching, Environmental Review Coordinator
Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA 90012

RE: Swan hall Renovation and Addition ENV- 2010-0653-EIR

I own the property of 5026 Eaton St within the notification zone.

I strongly support Occidental's current building plans, and I would hope that the City Planning Department will do everything possible to expedite their request for a building permit

Respectfully,



Michael and Lucille Arson
3720 S. Thistle St
Seattle, WA 98118
206 723-1006

Property owners 5026 Eaton St., Los Angeles 90042



May 24, 2010

Submitted electronically

Ms. Diana Kitching, Environmental Review Coordinator
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: Diana.Kitching@lacity.org

**Re: Swan Hall Renovation and Addition, Occidental College –
Notice of Preparation (ENV-2010-0653-EIR)**

Dear Ms. Kitching:

On behalf of the Los Angeles Conservancy, thank you for extending the deadline for comments on the Notice of Preparation of an EIR for the Swan Hall Renovation and Addition project at Occidental College. We also greatly appreciated the opportunity to tour Swan Hall and discuss the project with representatives of Occidental College on May 19. The Los Angeles Conservancy is the largest local preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. The proposed project deviates from Occidental College's commendable track record of sensitive stewardship by seeking to dramatically alter Swan Hall and potentially jeopardizing the eligibility of the surrounding historic district. The Conservancy firmly believes that Swan Hall can be rehabilitated in compliance with the *Secretary of the Interior's Standards* while meeting most of the project objectives, and seeks thorough consideration of less harmful preservation alternatives in the EIR.

I. Historic Significance

Built in 1914, Swan Hall was one of the first three buildings constructed for the Occidental College's new Eagle Rock campus. Along with Johnson Hall and Fowler Hall, Swan Hall was designed by one of Southern California's most notable architects, Myron Hunt, whose other notable works include the Rose Bowl, the Huntington estate (now the Huntington Library, Art Collections, and Botanical Gardens), and the now-demolished Ambassador Hotel. The simple Mediterranean Revival style of the Swan, Johnson, and Fowler buildings set the tone for the nascent campus, with their placement and orientation critical to establishing the common open space that would become the main quad at the heart of Hunt's master plan for the campus.

Originally designed as a men's dormitory, Swan Hall was renovated in 1960 as faculty offices. The sleeping porches on the west (rear) elevation were enclosed with aluminum windows and the interior likely reconfigured for offices. Following the 1994 Northridge earthquake, cracks in the exterior stucco were patched and the entire building encapsulated with acrylic paint. Despite a series of interior alterations, Swan Hall remains largely intact today and has been identified as a contributor to a potential historic district.

II. Impacts to Historic and Cultural Resources

It is our understanding that the proposed project would strip Swan Hall down to the concrete structural frame then attempt to recreate its historic appearance. This approach would leave virtually no historic fabric and would eliminate Swan Hall's eligibility as a historical resource. Not only would Occidental College lose one of its oldest, most significant campus buildings, but the surrounding historic district would lose one of its most prominent contributors.

A. Seismic Upgrades

Although several aspects of the proposed project would harm Swan Hall, the proposed seismic retrofit design would be particularly damaging, calling for removal of all exterior stucco, all interior plaster, and all hollow clay tile between the concrete structural frame throughout the building. New infill construction would be added and the exterior recreated using the existing salvaged windows and newly replicated decorative ornament.

This unnecessarily destructive approach conflicts with the *Secretary of the Interior's Standards for Rehabilitation*, which emphasize "preservation of those materials, features, finishes, spaces and spatial relationships that, together, give a property its historic character."¹ Specifically, the proposed removal of distinctive materials, features, finishes, and construction techniques, and the creation of a false sense of historical development by recreating the exterior, would breach Standards 2, 3 and 5. Likewise, the proposed replication of Swan Hall's historic features – including exterior walls, door surrounds and quoins – is contrary to accepted preservation practice.² Because today's construction practices can rarely match historic details, replication is only appropriate for restoring elements that have already been lost. For the same reason, replication is rarely considered meaningful mitigation for destruction of existing historic features. To the

¹ "Introduction," *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, available at www.nps.gov/history/hps/tps/standguide/overview/choose_treat.htm.

² The guidelines for the *Secretary of the Interior's Standards for Rehabilitation* provide a treatment hierarchy that places protecting and maintaining original features as the primary objective followed by repair first and then replacement of deteriorated elements, and finally, replication of missing elements, if desired and appropriate. See www.nps.gov/history/hps/tps/standguide/rehab/rehab_approach.htm.

extent possible, the original windows and door surrounds of Swan Hall should be retained in place, as removal and reinstallation increases the risk of damage.³

Fortunately, code flexibility for historic buildings and technological advances provide myriad options for seismically retrofitting Swan Hall with minimal impacts to its character-defining elements. Preservation Brief 41: The Seismic Retrofit of Historic Buildings is a good primer on issues to consider when planning a seismic retrofit:

Reinforcing a historic building to meet new construction requirements, as prescribed by many building codes, can destroy much of a historic building's appearance and integrity. This is because the most expedient ways to reinforce a building according to such codes are to impose structural members and to fill irregularities or large openings, regardless of the placement of architectural detail. The results can be quite intrusive. However, structural reinforcement can be introduced sensitively. In such cases, its design, placement, patterning, and detailing respect the historic character of the building, even when the reinforcement itself is visible.⁴

Hollow clay tile is a construction technology specific to the early 20th century in Southern California and was often hailed for its fireproofing properties. While we now understand its limitations for seismic stability, hollow clay tile remains an important historic record of past engineering innovation and should be considered a character-defining feature of Swan Hall.

Preservation architects and engineers have made great strides in addressing seismic concerns while retaining hollow clay tile in place. Recent advances in carbon and composite fiber wrap, center coring, and the strategic insertion of shear walls and bracing have allowed our most beloved historic buildings – such as the 1913 Los Angeles County Natural History Museum and the 1911 Huntington Art Galley (also by Myron Hunt) – to retain significant historic fabric, adhere to the *Secretary of the Interior's Standards*, and meet today's seismic and use requirements. These innovations have been facilitated by the California Historical Building Code, which offers code flexibility to meet the performance requirements of current codes without sacrificing historic integrity.

B. Floor Leveling

Among Swan Hall's more unusual features are its varying floor levels between the north, middle, and south sections of the building, as well as longitudinally between the two-story east portion fronting the main quad and the three-story portion sited on the naturally lower grade to the west. Although the desire to create uniform floors levels may be a

³ For information on the appropriate treatment of historic stucco, refer to Preservation Brief 22: "The Preservation and Repair of Historic Stucco," Anne Grimmer (National Park Service), available at www.nps.gov/history/hps/tps/briefs/brief22.htm.

⁴ Preservation Brief 41: "The Seismic Retrofit of Historic Buildings - Keeping Preservation in the Forefront," David W. Look, AIA, Terry Wong, PE, and Sylvia Rose Augustus (National Park Service). See www.nps.gov/history/hps/tps/briefs/brief41.htm.

legitimate project goal, the proposed leveling should be accomplished without impacting exterior historic features or their functionality. As currently proposed, the floor leveling would render the prominent middle doorway facing the quad completely inoperable, an impact that could be easily avoided by carving out a small vestibule to provide access to adjacent faculty offices.⁵ By preserving access through this primary entrance, Swan Hall's original orientation to and interaction with the main campus would be fully maintained.

C. Connector

The proposed three-story connector between Swan Hall and the new addition would unnecessarily destroy ornamental details and cut into the roofline of the historic building. We propose that the connector be narrowed to reveal the quoins and provide a greater sense of Swan Hall's existing tripartite configuration. The connector should also be lowered in height to avoid the historic roofline and to enable Swan Hall to continue to read as a separate building.

D. New Addition

The massing, scale and location of the new addition should be refined to better respect the character of Swan Hall and refrain from competing with the historic building. Although no new faculty or staff office space is to be added, the proposed three-story addition will be taller than Swan Hall and almost 40 percent larger – more than doubling the useable space. Likewise, the floor heights between the two buildings appear to be misaligned, creating new floor offsets that the renovation is seeking to correct. We propose that the floor heights in the new addition be adjusted to reduce the overall height of the building, or placed further underground and the plinth eliminated.⁶

III. The EIR Must Evaluate at Least One Potentially Feasible Preservation Alternative

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."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 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.

⁵ The north and south doors will continue to provide access from the campus side of the building.

⁶ Refer to Preservation Brief 14: "New Exterior Additions to Historic Building: Preservation Concerns," as well as "Interpreting the Secretary of the Interior's Standards for Rehabilitation," Numbers 3 and 18, for examples of additions compatible in scale, size, materials, and design.

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

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

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 Accordingly, the Draft EIR should include at least one bona fide preservation alternative that attempts to meet project objectives while retaining Swan Hall’s eligibility as a historical resource, taking advantage of code flexibility under the California Historical Building Code and focusing on interior upgrades that avoid disturbing exterior character-defining features.

We hope that Occidental College will reaffirm its commitment to its rich architectural heritage, as recently articulated in the school’s 2006 draft master plan. Thank you for the opportunity to comment on the Notice of Preparation for the Swan Hall Renovation and Addition project at Occidental College. Please feel free to contact me at (213) 430-4203 or mbuhler@laconservancy.org should you have any questions.

Sincerely,



Mike Buhler
Director of Advocacy

cc: Councilmember Jose Huizar, Council District 14
Highland Park Heritage Trust
The Eagle Rock Association

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.