
CHAPTER 3: ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

An Initial Study was conducted for the proposed project and determined that the only potential non-mitigable impact would be to historic resources. Thus this EIR analyzes only the impacts of the project on historic resources. Other issues are addressed in the Initial Study that is included in Appendix A.

The project would be required to comply with applicable regulations as well as City of Los Angeles standard conditions that would ensure that other impacts would be below a level of significance.

The following discussion includes an analysis of the proposed project impact on the environment in compliance with Section 15126 of the CEQA Guidelines. The discussion of historic resource impact includes the following subsections:

- Environmental Setting;
- Project Impacts;
- Mitigation Measures; and
- Significance After Mitigation.

3A. Historic Resources

This section focuses on identifying potential impacts to historical, and provides information regarding the history the project assessment area.

A detailed Cultural Resource Study for the project site was prepared by Jones & Stokes in 2003.¹ In addition an historic resources assessment of the proposed project was prepared by KCK Architects in September 2010. The Historic Resources Impact Assessment also includes the original cost estimate prepared by Cumming for the project Architect, as well as a peer review of that cost estimate prepared by C.P. O'Halloran. The full text of the Cultural Resource Study can be found in **Appendix B** and the full text of the Historic Resources Impact Assessment can be found in **Appendix C**. Both Appendices B and C are available on-line or in hard copy at the Department of City Planning, Room 750, City Hall. This section summarizes information contained in the Cultural Resource Study as well as the Historic Resources Impact Assessment and provides information on the regulatory framework affecting the treatment of potential cultural resources.

¹ Jones & Stokes, *Cultural Resources Study for Occidental College, Eagle Rock, Los Angeles, California*, September 2003.

Environmental Setting

Project Area

The Northeast Los Angeles Community Plan area, which includes the proposed project site, consists of several distinct neighborhoods that have developed as separate communities. Between 1910 and 1930 many of these areas were annexed by the City of Los Angeles. Developed near transportation corridors or a notable landmark, each area is defined by its topography and architectural character. For example, Lincoln Heights contains the highest concentration of pre-1910 residences in the Plan Area; its numerous hills and vistas define the area's topographical character. The San Rafael Hills, Mount Washington, Montecito Heights, and the Los Angeles River are the major natural features of the Northeast Plan area. One of the Plan area's many freeways includes the historic Pasadena Freeway (SR 110), known originally as the Arroyo Seco Parkway, was the first parkway built in Southern California. Rows of historic street trees make an important contribution to the ambience of the Plan Area's neighborhoods.

The development of local streetcars spurred residential development in the Northeast Los Angeles Community Plan area. Until the establishment of the Los Angeles and Pacific Electric System, horse-drawn street cars connected downtown with outlying areas. Street railway franchises were privately owned; railways eventually changed to cable roads to improve access. This change dramatically increased property values and established the historic pattern of commuting into the central city for work. Passenger rail stations were located in every community.

Single-family homes were the predominant type of residential development; Victorian styles were the predominant style prior to 1900. Craftsman-style homes began to appear around the same time. Other architectural styles began to appear after 1900, including Classical or Colonial Revival bungalows, and Mediterranean Streamline Modern and Modernist. Many were constructed in the Mount Washington area. Defined by the home styles that dominated the region in the 1920s and 1930s, residential neighborhoods such as Eagle Rock remain stable well-maintained single-family communities.

The Northeast Los Angeles Community Plan area contains several phases of architectural evolution in Los Angeles, including the following:

- Queen Anne Revival (1885-1900);
- Turn of the Century (1895-1905);
- American Foursquare (1895-1910);
- Craftsman (1895-1920);
- Colonial Revival (1895-1915);
- Spanish Colonial Revival (1915-1941);
- Utilitarian Commercial (1915-1929);
- Art Deco (1920-1941); and
- Streamline Moderne (1930-1941).

In addition to the built form and streetscape, natural and man-made open space amenities define the area. The Los Angeles River's riparian habitat flowing through the Atwater Village area and the Arroyo Seco are among the many natural features. Other geologic landforms such as the San Rafael Hills, Mount Washington, Eagle Rock, and the Montecito Heights add to the richness of

the natural landscape of the Northeast communities that also includes open spaces, park lands and equestrian trails.

The Occidental College campus is situated in the Eagle Rock region, characterized by foothills along the southern base of the San Rafael Hills at elevations ranging from approximately 540 feet to 867 feet. The proposed project would also be located approximately two miles west of the channelized Arroyo Seco and approximately three miles east of the channelized Verdugo Wash.

Historical Setting

The 120 acres comprising the Occidental campus were part of Jose Maria de Verdugo's 36,403-acre Rancho San Rafael, originally granted as a concession by the Spanish government in 1784. After his death in 1831, Verdugo's heirs eventually sold the rancho at auction to Alfred B. Chapman to pay off debts. Litigation contesting the title followed, ending with the courts dividing the land into 31 parcels. The largest award went to Benjamin Dreyfus and included all of Eagle Rock except for the Rockdale area.

Eagle Rock

During the late 19th century and into the early part of the 20th century, Eagle Rock remained a rural suburb of Los Angeles. Subdivided into both small family plots and larger corporate farms, much of the area was used for growing strawberries or other truck crops. By 1906, the Los Angeles Railway streetcar system reached Eagle Rock from downtown Los Angeles along with what is now Eagle Rock Boulevard, and extended to the intersection of Townsend Avenue and Colorado Street, which was at that time the center of the town. Another line linked Eagle Rock and Glendale. In 1910, the trustees of Occidental College elected to move their campus from Highland Park and build a new campus on the slopes of an open hillside in Eagle Rock. The following year, citizens of the area voted to incorporate Eagle Rock as a city. By that time, homes in the city included Victorian farmhouses and an increasing number of Craftsman-style homes. Many of the newer houses were built in neighborhoods surrounding the Occidental College site, built by developers hoping to profit from establishment of the new campus.

Eagle Rock experienced a building boom in the years following World War I. New subdivisions included Spanish Eclectic, Colonial, and Tudor Revival houses. It was at this time that many other notable structures in Eagle Rock were built, including the Women's 20th Century Club, the Eagle Rock Carnegie Library, and many brick and stucco commercial buildings along the main boulevards. Later decades brought other architectural styles to Eagle Rock homes and commercial structures, such as streamline moderne, International, post-war traditional, and mid-century modern.

In 1923, the people of Eagle Rock voted to become part of the City of Los Angeles in large part because the growing community was under the threat of an inadequate water supply and because of a promise by Los Angeles to upgrade the public school system. Ironically, the vote for annexation came not long after the Eagle Rock City Hall and adjacent fire and police stations were completed.

Occidental College

The Occidental College campus includes monumental and historic educational buildings, whose facades are characterized by formality, regularity of openings, and a moderate level of detail. This architecture is derived from Mediterranean prototypes, both Spanish and Italian. It is compositionally free and unique to the Occidental Campus.

As an invaluable and natural resource, the Occidental Campus has often been referred to as an “urban oasis,” reflecting its pastoral setting, appealing landscape and grounds, and unique elevated location at the edge of existing city neighborhoods and districts.

Several histories of Occidental College have been written, most notably Andrew Rolle’s *Occidental College: The First Seventy-Five Years* and his subsequent *Occidental College: A Centennial History*. These works thoroughly chronicle many aspects of college administration, campus development, and student life and serve as primary resources regarding the history of the college. In brief, Occidental College was founded in 1887 by a group of Presbyterian ministers and laymen. The campus was originally located in the Boyle Heights area of Los Angeles. Its first student body included 27 men and 13 women. In 1896, the College’s only building burned down, leading the school to relocate to the city’s Highland Park area. The new site was bounded by three busy streets, and by 1910, space limitations forced a third and final move, this time to the Eagle Rock site. That same year the board of trustees chose established and noted architect Myron Hunt to plan the campus and design its buildings.

Occidental College campus history in Eagle Rock began with the significant role of Myron Hunt played as the master planner of the original College site plan and architect for numerous buildings until 1940. Hunt’s extraordinary body of completed work at Occidental College-- a total of 21 buildings and other facilities set out a dependable system of organization for the College. His emphasis on the structure afforded by a brilliant plan and a spare but elegant massing rendered in a Mediterranean architectural vocabulary established the physical identity of the campus for decades to come. A total of 19 buildings designed by Hunt have survived and most have been unaltered. The two exceptions are Alumni Gymnasium and the Taylor Pool, which were remodeled in 1965 and again in 1997.

Occidental College campus history also includes Beatrix Farrand’s role as a landscape architect for a series of key spaces, including the main quadrangle. These influences formed the principal design direction for the campus and environment, and make the campus an important historical artifact and a potential historic district.

A survey conducted by Jones & Stokes identified a potential Historic District on the Occidental College campus comprised of 23 contributing elements (17 buildings and six other features). **Table 3A-1**, below, identifies all 23 contributing elements; **Figure 2-2** provides a map of the potential Historic District.

**TABLE 3A-1
ELEMENTS CONTRIBUTING TO THE POTENTIAL OCCIDENTAL COLLEGE HISTORIC DISTRICT**

Map No. Figure 2-2	Building	Year Built	Description
3	Fowler Hall	1914	Four-story building designed by Myron Hunt at the core of the original campus, paired with its mirror image, Johnson Hall, joined by a central plaza. Beaux-Arts with Spanish-Revival influence.
2	Johnson Hall	1914	Four-story building designed by Myron Hunt at the core of the original campus, paired with its mirror image, Fowler Hall, joined by a central plaza. Beaux-Arts with Spanish-Revival influence.
7	Swan Hall	1914	Built with Johnson and Fowler Halls and designed by Myron Hunt. Considered an example of Hunt's "Californian" idiom. Features stucco walls, hipped tile roof, exposed beams, and symmetrical elevations.
126	Campus Quadrangle	1914	Designed by Myron Hunt, the quadrangle is formed by Johnson and Fowler Halls on the east, the Clapp Library on the south, Swan Hall and the Herrick Interfaith Center on the west, and the Freeman College Union building on the south. It features broad pathways with bench seating, mature trees and tiered planters.
101	Patterson Field	1916	Designed by Myron Hunt as the football stadium with its original field and grade layout. (The bleachers, lighting, track and other features have been replaced over the years.) The site maintains its views of Swan Hall, the gymnasiums, and the Freeman College Union building.
19	Admissions	1922	A two-story wood frame building designed as a home for the Occidental College President. Features wood siding and a cross-gabled shingled roof. The entrance includes a small portico with round and square columns.
16	Samuelson Campus Pavilion	1922	A single-story building designed by Myron Hunt as the Women's Gym, subsequently used as a sculpture studio and remodeled in the 1990s.
5	Mary Norton Clapp Library	1924	Two-story building designed by Myron Hunt and featuring 28-light wooden sash windows on the first floor. An expansion was designed by Hunt's former partner H.C. Chambers and built in 1954. In 1970 a four-story major addition was designed by Neptune and Gregory on the west side of the library.
22	Remsen Bird Hillside Theater	1925	A concrete amphitheater designed by Myron Hunt and built into a natural hillside bowl, with a dressing room addition added in 1965. Consists of a stage, a lower seating area, an upper seating area, and a concession area.
17	Weingart Center	1925	Designed by Myron Hunt, and formerly known as Orr Hall; it was originally part of a dormitory quadrangle.
14	Booth Music- Speech Center	1926	Designed by Myron Hunt as a "quadrangle building." Practice halls and east wings built in 1926. West side constructed in 1938 and an addition enclosing the quadrangle was constructed in 1960. Considered to be Mission Revival with Classical elements.
24	Erdman Hall	1927	Designed by Myron Hunt and originally part of a dormitory quadrangle. Consists of a series of four two-story sections. The entry consists of a vestibule with arches and Corinthian columns. The elevations feature French doors and wrought iron balconettes. The second floor includes sleeping porches and a sunroom.
15	Freeman College Union	1928	Designed by Myron Hunt. A substantial addition was made to the north end in the late 1990s. Designed in Hunt's "Californian" idiom. Features stucco walls, hipped tile roof, exposed eaves, and an arcade that forms a courtyard.
[not numbered]	Pardee and Thompson Gates	1931	Two identical sets of gates designed by Myron Hunt. Designed to provide a formal entrance without closing off the campus from the neighborhood.
21	Urban & Environmental Policy Institute	1932	A two-story Monterey-style house with stucco walls, a low-pitched gable tiled roof, and a cantilevered second-story balcony covered by the roof.
[not numbered]	President's House	1932	A two-story Monterey-style home with stucco walls and a low-pitched hipped, and tiled roof, with cantilevered second-story balconies covered by the roof.
27	Emmons Health Center	1936	Designed by Myron Hunt on a slope above the site of the administrative building. Exhibits elements of Hunt's "Californian" idiom. Entrance features a small arcade with stucco pillars and a shed tiled roof.
	Perimeter Landscaping	1937	Designed by Myron Hunt and reflects tendency to incorporate landscaping into his designs. The perimeter landscaping extends along Campus road from Coons Road to Armadale Avenue; and is comprised of two tiers of

Map No. Figure 2-2	Building	Year Built	Description
13	Thorne Hall	1938	plantings that include eucalyptus and pine. Designed by Myron Hunt as the main auditorium. Features three entries aligned within the spaces between columns and a wide plaza connected to the quadrangle.
26	Haines Hall	1940	One of the last buildings designed by Myron Hunt and originally part of a dormitory quadrangle. Mostly unadorned, but features multiple French doors and wrought iron balconettes.
35	Wylie Hall	1940	Three-story building that is one of the last buildings designed by Myron Hunt. Uses both Californian style and Spanish-Revival architectural styles.
[not numbered]	Circulation Network/Landscaping	Various times	Designed by Myron Hunt as part of a landscaping plan to beautify the hillside on which the campus was built. Original landscaping included blue-gum eucalyptus, and lush plantings. The original circulation plan was limited to the perimeter of the campus.
[not numbered]	Alumni Avenue (east of Campus Road)	Various times	Designed by Myron Hunt, this two-lane roadway was intended to be a strong central axis for the campus. From Campus Road, Alumni Avenue slopes upward toward the quadrangle and the Coons Administration Center.

SOURCE: Jones & Stokes, 2003.

According to the Jones & Stokes report, all 23 elements appear to meet the criteria for listing in the California Register of Historical Resources. This potential historic district also includes approximately 18 noncontributing buildings and elements. These include Bell Field, located along Campus Road; Alumni Gymnasium; Taylor Pool Field Building; and others.

Three residence halls were recently renovated on the campus: two historical buildings -- Erdman and Wylie Halls were both designed by Myron Hunt. The third residence hall, Bell-Young, was built in the 1950's. There was no change to the exteriors (including windows) of Erdman and Wylie. These renovations did not require discretionary permits, and were therefore exempt from CEQA.

Myron Hunt, Architect

Myron Hunt (1868-1952) studied at Northwestern University and graduated from Massachusetts Institute of Technology (MIT) with a degree in architecture in 1893. After graduation he spent several years in Europe with his new wife while he studied early Renaissance architecture. In 1896 he went to work in the Chicago office of Shepley, Rutan and Coolidge, a prominent Boston architectural firm and went on to design expensive suburban houses.

In 1903 Hunt moved to Pasadena, California for a better climate for his wife who had been diagnosed with tuberculosis. He soon established a partnership with Elmer Grey. The partnership of Hunt and Grey lasted until 1910. From 1910 to 1920 Hunt practiced alone; in 1923 he formed a partnership with H.C. Chambers. H.C. Chambers was a graduate of the Armor Art Institute (1909) and had worked briefly under Hunt and Grey. Hunt's partnership with Chambers lasted 26 years until Hunt retired in 1947.

Hunt was a prolific architect with over 400 buildings completed during his career. These structures included types as varied as houses, schools, churches, hotels, hospitals, libraries, college campuses, and military facilities. Notable Southern California projects included The Huntington Library in San Marino (1910), the Huntington Hotel in Pasadena (1913), the Ambassador Hotel in Los Angeles (1919, demolished 2008); the Pasadena Public Library (1927) and the Rose Bowl (1920-24).

Regarding Hunt's college planning and Occidental College, historian Robert Winter observed that Hunt's "success with the business classes made him very attractive to boards of trustees...Hunt had proven himself a careful student of the business point of view which is to get a job done in the best way possible, as soundly as possible and with as few frills as possible. Architecturally this philosophy does not often produce great buildings, but it does produce a great many good ones. That is the key to the fact that, while none of Occidental's buildings will ever appear in texts on architectural history, the general effect on the average viewer as well as every alum is of a very beautiful, even distinguished campus. Boards of trustees do not generally expect great architecture. They want a campus that looks like a college but also looks as if it had been founded on common sense. This, Myron Hunt gave Occidental."²

Occidental historian Robert Class Cleland also noted that Hunt brought to "his task the ability to see both present and future needs, the wisdom to select an architectural style appropriate to the campus and its environment, and the skill to make every building add to the harmony and beauty of the whole...[and] he was also sometimes required because of budget limitations to make his bricks with very little straw."³

According to Winter the Occidental Plan "is obviously related to the plans that Hunt and Grey had developed slightly earlier for Throop and Pomona. These, according to good accounts, are based on Hunt's analysis of Thomas Jefferson's plan for the University of Virginia, but the source is more clearly to be found in Hunt's training in Beaux-Arts organization that he obtained at M.I.T." Hunt's plan was also influenced by "centrally planned campuses designed in the 1880s and '90s" such as Stanford, Columbia, the University of Chicago and University of California at Berkeley."⁴

Winter notes that Hunt had "the prestige of designing a whole campus of buildings" and "after 1922 Hunt averaged one major building a year and even after the Great Depression struck in 1930 his record was very good." Hunt designed and supervised the construction of 21 buildings on Occidental's campus between 1912 and 1940." Winter describes Hunt's "more personal and important goal" to be "the provision of a healthy environment in which to live and learn." He continues noting "Hunt learned as he built...the classroom buildings, Johnson for the liberal arts and Fowler for the sciences, were fairly conventional in their planning—large rooms with tall windows giving plenty of light and wide hallways that made for easy circulation. One of Hunt's few quirks was a passion for changing floor levels, a picturesque survival that would be appreciated by romantics but not by rationalists."⁵

In the final analysis Winter stated that "Myron Hunt was not a great architect. He was not even in the running. But he was a good architect and an extraordinarily successful one as the world measures success. His tally of over four hundred completed buildings—schools, hospitals, banks, libraries, hotels and many houses—testifies his ability to satisfy his clients." He adds that with the firm of Hunt and Grey "their conservatism was the secret of their success with business people...Hunt was an artist but he was also a consummate businessman...[he] mixed art with

² Robert Winter, *Myron Hunt at Occidental College*. Los Angeles: Occidental College, 1986, p.14.

³ Robert Class Cleland, *The History of Occidental College 1887-1937*. Los Angeles: Ward Ritchie Press, 1937, p. 45.

⁴ Winter, *Myron Hunt*, p. 18.

⁵ *Ibid.*, pp. 23-24.

efficiency and good sense, and you got your money's worth...Hunt was a businessman's architect."⁶

Architectural Style

In the monograph "Myron Hunt as Architect of the Public Realm," Stefanos Polyzoides and Peter de Bretteville analyze the buildings on the Occidental College campus noting that they "were not expressed as unique objects, but as interrelated ones. What is shared between them is stressed...the resulting flatness or dullness of the architecture was intentional. What was to be featured as unique was the grounds—the public places of assembly that represented the whole university—and the buildings that terminated the axes."⁷

In his monograph "Myron Hunt and the California Culture," Winter also observed that Hunt's work "whether American or Spanish Colonial, retained a dry look that may be attributed to the reticence of his Arts and Crafts period. The almost neutral feeling of most of Hunt's work from 1912 to 1937 at Occidental College is a case in point."⁸

Polyzoides and de Bretteville stated that, "on their exteriors, the public buildings' regular volumes are articulated in response to mostly contextual, exterior factors. Horizontally, they are divided into three zones; the base, body, and cornice varies as necessary from building to building, but material, color, texture and depth of relief are very similar. Vertical inflection is limited to large-scale projections or recessions of the buildings' volumes at the centers or corners as necessary...Overall, however, the order of the whole campus remains dominant and the individual buildings, somehow mute."⁹

Regarding the style of the campus, a contemporary description in the *Los Angeles Times* stated that "the architecture to be followed is defined by the architect as 'Californian.' It will follow Spanish and Italian lines, with a leaning to the classical."¹⁰

Winter described the campus style as Spanish with "the unifying theme being tile roofs...The early buildings naturally enough have a Beaux-Arts organization—with a lintel and then what appears to be an attic but is just another floor similarly but more emphatically separated. The later designs are looser and more picturesque in their organization with asymmetrically placed doors and towers." And he noted that "it was the Spanish idiom that was to remain constant, though watered down until the building of the Herrick Chapel" in 1965.¹¹

Overview of Swan Hall

Four initial buildings were planned, two academic buildings and two dormitories. The first buildings to be constructed were initially called the Johnson Hall of Letters followed by the Fowler Hall of Science at a cost of \$100,000 each. Only one of the two dormitories was constructed, the men's dormitory called Swan Hall that was built for about \$50,000.¹²

⁶ Ibid., pp. 7,12.

⁷ Polyzoides and de Bretteville, p. 103.

⁸ Winter, *Myron Hunt, The Search for a Regional Architecture*, p. 77.

⁹ Polyzoides and de Bretteville, p. 103.

¹⁰ *Los Angeles Times*, December 17, 1911.

¹¹ Winter, *Myron Hunt at Occidental College*, pp. 29-30.

¹² *Los Angeles Times*, December 17, 1911

At their dedication in 1914 the *Los Angeles Times* reported that the three buildings “are of the most permanent construction of steel and concrete, with terra cotta tile and are absolutely fireproof and indestructible as it is possible for buildings to be. They are rather severe in their plainness, but admirable for the purposes of education.”¹³

Hunt’s original campus plan was developed showed a “central building, probably intended for administrative offices and classrooms, was to act as a focal point of a plan developed on a formal cross-axial arrangement with the main axis, a drive lined with trees, extending west to what is now Alumni Avenue. A minor axis would run north and south in front of Fowler and Johnson halls” according to Winter. The dormitories were planned “at the front of the campus near Campus Road. Of this concept only Swan Hall was realized.” It is not known why the later dormitories were not sited as planned but speculation is that that area was to provide “athletic facilities more extensive than Patterson Field” could provide.¹⁴

The center of campus featured a cross-axis plan with the similar-sized Johnson and Fowler Halls on the northeast and southeast, respectively. The dormitory Swan Hall was constructed across the Quadrangle, to the west, of Johnson Hall. Across from Swan Hall (and west of Fowler Hall) is the Herrick Memorial Chapel, built in 1964 and considered as a non-contributing building.

The athletic field, Patterson Field, sited to the southwest of Swan Hall, was constructed in 1916. Patterson Field is considered a contributing feature of the Campus Historic District. An open space area lies between Swan Hall and the Alumni Gymnasium that contains three large eucalyptus trees. The Alumni Gymnasium was built in 1926 but underwent extensive alterations in renovations that occurred in 1965 and 1997 and as a result it has become a non-contributing building.

Hunt’s design for Swan Hall was based on a split-level concept that divided Swan Hall into sections--north, middle and south. The central area is slightly higher than the north and south ends and the entire building is stepped internally between the front east side and the west. The site itself is sloped from east to west so the stepping helps accommodate a full additional lower floor facing west. The internal stepped floor clearly shows on the end elevation (north and south) where the windows of one portion are offset from the windows in the other half. Winter calls this split level a “slightly mad disposition of floors.” He adds, “not only were the floors of Middle Swan several feet below those of the adjoining sections but also the fronts and backs of all the sections had different floor levels.” Winter states that “Hunt all but gave up this idiosyncrasy in later buildings.”¹⁵

According to Winter, Hunt’s goal to provide a healthy environment was rooted in the Victorian-era concerns regarding the “value of fresh air and the problems of ventilation” and “this interest in fresh air was also significant at Occidental. Among the almost hidden virtues that he designed into Swan Hall was a row of sleeping porches at the rear of the top floors of both its north and south sections.”

Occidental College’s early dormitories were considered very livable because of amenities such as

¹³ *Los Angeles Times*, March 26, 1914.

¹⁴ Winter, *Myron Hunt at Occidental College*, p. 18.

¹⁵ *Ibid.*, p. 24.

fireplaces and “the general spaciousness of the living rooms.” Swan Hall’s large living rooms were remodeled into offices in 1960.¹⁶

While Swan Hall was the first dormitory constructed it did not serve as the model for subsequent dormitories. Polyzoides and de Bretteville state that, “the organizational and stylistic code that Orr Hall established for the rest of the dormitories can be seen in Erdman Hall built in 1927. Orr Hall was conceived as a regular mass organized around a single entry and a double-loaded corridor. It was occupied by both common rooms and typical student bedrooms...the architectural references of the building are vernacular and therefore informal.”¹⁷

Swan Hall was designed to conform to a gentle westward slope; it has four levels total including a basement. The building’s east elevation, its primary façade, faces the quadrangle and is two stories high. To the west the ground slopes downward so Swan Hall’s west, rear elevation is three stories, with a basement visible at the north end. The east elevation is divided into three major bays along a symmetrical façade. The central bay features a centered entryway with decorative door surround with Ionic columns and entablature that features the engraved name of the building. Each of the flanking bays also features a centered door with a door surround with pilasters with Doric pilasters. The central bay projects out slightly and is defined by quoins. All corners of the building also feature quoins (cornerstones). A string-course defines the horizontal separation of floors. The building is capped with a clay-tile hipped roof with deep overhang supported by decorative wood rafter tails. Windows are symmetrically arranged and are 1/1 double-hung with wood sash and transoms.

The west elevation reveals three stories and basement at the north end and three stories at the south end. This elevation is also organized into three bays. The central bay features a centered entry door with vertical windows organized in a symmetrical fashion. The flanking bays originally had sleeping porches without glazing at the top floor. These porches were glassed in later. The windows on the other floors are arranged in a symmetrical manner. The placement of the windows on the north and south elevations reveal the split-level interior. The elevation is divided into two bays and the windows appear to stair-step down the façade from right to left. Originally a staircase was located adjacent to the building at the northwest end.

There have been a few alterations to Swan Hall’s exterior, mostly repair of earthquake damage that included a portion of the end walls that were repaired with new infill structure and re-plastered with stucco. The most significant change occurred to the interior of Swan Hall in 1960 when it was remodeled from residential use to faculty offices. Interior spaces were subdivided and fashioned into a maze of offices due to the discontinuous and split-level configuration. All of the finishes and features of the residential use were removed or obscured and the sleeping porches were glassed in to create additional office space.

Swan Hall Existing Materials and Character-Defining Features

Historic character, while generally focused on visible and visual aspects of the building, also relates to retention of original materials. The Secretary of the Interior’s Standards for Rehabilitation refers to both the removal of historic materials as well as alteration of features and spaces that characterize a property. The original materials as well as the construction technology

¹⁶ Ibid., pp. 24-26

¹⁷ Polyzoides and de Bretteville, pp. 103-104.

and methodology are contained within the existing building and are fundamentally part of the historic character. The patina of age and changes over time are also evident in older structures.

This building is constructed with a concrete structural frame with hollow clay tile (HCT) infill wall finished with plaster. The hollow clay tile was an important advance in the fireproofing of buildings and was used extensively at the time. The clay tile behind the plaster façade returns back at the deep window recesses and then connects with hollow clay tile on the interior side creating a deep box-like exterior wall with an airspace inside. Construction with hollow clay tile finished with plaster was common for Myron Hunt's buildings and similar to the Ambassador Hotel except for the use of the double wall in Swan Hall where the returns for the windows may provide added strength to the assembly. The plaster finish (except in areas of repair following the Northridge earthquake at the building ends), while possibly covered with a heavy paint or coating is of original cement plaster construction including typical heavier finish coat. Most of the decorative façade features are finished with plaster. Plaster at the time was a 2-coat process with a thicker finish coat (3/8" +/-) that allowed more workability and shaping than modern 3-coat plaster.

In addition to the underlying historic fabric of the building, specific building elements can be identified as character defining features. **Table 3A-2** below identifies character-defining features of Swan Hall.

**TABLE 3A-2
SWAN HALL CHARACTER DEFINING FEATURES**

Exterior
<p>Overall</p> <ul style="list-style-type: none"> • Original dimensions and details with original materials and construction system • Overall facades with plaster finish over clay tile • Clay tile clad roof
<p>Front, East Façade:</p> <ul style="list-style-type: none"> • Recessed window openings with concrete sill at first story (string course as sill at second story in middle bay) • Double-hung 1/1 wood frame windows with transom • Cornice below roof • Deep roof overhang with decorative rafter tails
<p>Front East Façade Middle Bay</p> <ul style="list-style-type: none"> • Projecting bay with centered entry • Entablature with Ionic columns, decorative frieze, cornice with decorative engraved panel above • Steps leading up to door • Original wooden double doors with glazing • String course separating first and second stories • Second story exterior with horizontal scoring • Quoins at corners of first story
<p>Front East Façade, South and North Bays</p> <ul style="list-style-type: none"> • Centered entry bay • Entablature with Doric pilasters and engraved frieze panel • Steps leading up to door • Original wooden double doors with glazing • Multi-light transom above doors • Quoins at corner ends of building
<p>Rear, West Elevation</p> <ul style="list-style-type: none"> • Recessed window openings with concrete sill at second story • String course as sill between second and third stories • Double-hung 1/1 wood frame windows with transom at second story • Cornice below roof • Deep roof overhang with decorative rafter tails
<p>Rear West Elevation, Middle Bay</p> <ul style="list-style-type: none"> • Projecting bay with centered entry

<ul style="list-style-type: none"> • Entablature with Ionic columns, decorative engraved frieze, cornice • Original wooden double doors with glazing • String course separating second and third stories • Third story exterior with horizontal scoring • Quoins at corners of first and second stories
<p>Rear West Elevation, North and South Bays</p> <ul style="list-style-type: none"> • Horizontal sleeping porch openings (now glazed) at third story • Quoins at corner ends of building
<p>North and South Elevations</p> <ul style="list-style-type: none"> • Features two sections defined by split level • Two-story eastern section projects out slightly with quoins at corners; quoins also at west corner of western section • Western section features ends of sleeping porches at third story • Recessed window openings with cast sills at first and second stories • Double-hung 1/1 wood frame windows with transom at second story • Cornice below roof • Deep roof overhang with decorative rafter tails
<p>Interior</p> <ul style="list-style-type: none"> • Circulation system of split levels and stairways • Interior side of window openings
<p>Landscaping</p> <ul style="list-style-type: none"> • Large eucalyptus trees to west
<p>Source: KCK, September 2010</p>

Landscaping

The 2003 Campus Historic Resources Survey identified the Quadrangle area with its landscaping as a contributing feature of the potential Campus Historic District. The Quadrangle area features “broad pathways with areas of bench seating, mature trees, and tiered planters with lawns and other plantings.”

Photographs of Swan Hall illustrate how the landscaping along the front, quadrangle facing, façade has evolved. Early photographs show four planting areas positioned between the ends of the buildings and the door and on each side of the center door. These planting areas were initially planted with low-lying shrubs. At one point in time ivy was growing up the front façade and later a single tree was planted in the center of each of the four planting areas. This concept of four planting areas with centered tree remains today.

An open space area lies between Swan Hall and the Alumni Gymnasium which contains three large eucalyptus trees, including one over three feet in diameter. The 2003 Campus Historic Resource Survey forms identifies as contributing features the perimeter landscaping of the campus as including “two tiers of plantings; a lower level of shrubs and bushes at the sidewalk level with a taller row of eucalyptus and pines behind.” Also considered as contributing features were the “circulation network/landscaping” of the campus. The 2003 Survey did not identify specific landscape elements and their locations so there is no inventory of individual contributing landscape features. However, it appears that the eucalyptus trees in the open space behind Swan Hall were planted in the early decades of the campus and are considered as elements of the historic landscape.

Regulatory Background

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP), which is maintained by the National Park Service (NPS) under the Department of the Interior, the Advisory Council on Historic Preservation, State Historic Preservation Offices, and grants-in-aid programs. Criteria for listing on the National Register include association with events, persons, history, or prehistory or embodiment of distinctive characteristics. These criteria are based on context (theme, place, and time), integrity (location, design, setting, materials, workmanship, feeling, and association), and, if a recent resource, exceptional importance.

The Secretary of the Interior's Standards for the Treatment of Historic Properties provides standards for rehabilitation, renovation, restoration, and reconstruction of historic properties, particularly for properties listed on the National Register of Historic Properties or historic properties that are potentially eligible for the National Register. In general, when a property's distinctive materials, features, and spaces are essentially intact and thus convey the historic significance without extensive repair or replacement; when depiction at a particular period of time is not appropriate; and when a continuing or new use does not require additions or extensive alterations, preservation may be considered as a treatment. Rehabilitation is considered an option when repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate.

Other options included in the Secretary of the Interior's Standards include restoration, which generally applies when the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods. Reconstruction applies when a contemporary depiction is required to understand and interpret a property's historic value (including the recreation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction.

Section 106 of the NHPA requires all federal agencies to consult the Advisory Council on Historic Preservation before undertaking any activity affecting a property listed on, or eligible for listing on the NRHP. The Advisory Council has developed guidelines for compliance with Section 106 to encourage coordination between lead agencies and cultural resource agencies.

State

State Office of Historic Preservation

The Office of Historic Preservation (OHP), through its State Historic Preservation Officer (SHPO) and the State Historical Resources Commission, implements state preservation law, and

is responsible for maintaining the California Register of Historic Places (California Register) and for administering federally- and state-mandated historic preservation programs.¹⁸ These programs include the California Historic Resources Inventory System (CHRIS), which uses the National Criteria for listing resources significant at the national, state, and local level. CHRIS consists of twelve information centers under contract to OHP to maintain a database of potential archaeological and historic resources, provide information on resources and surveys to the public, and to maintain and provide a list of consultants qualified to do historic preservation fieldwork in their area. In addition, OHP oversees the California Historic Landmarks and California Points of Historical Interest programs, and provides technical assistance to California's city and county governments.

California Register of Historic Resources

A resource may be listed in or eligible for listing on the California Register (CR) if it meets any one of the following criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- It is associated with the lives of persons important to local, California or national history (Criterion 2).
- It embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation (Criterion 4).

Even without a formal determination of significance and nomination for listing on the CR, the lead agency can determine that a resource is potentially eligible for listing. According to OHP, integrity is one of the basic underlying criteria that all listings on the CR must meet. OHP states:

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

Although resources may not maintain enough integrity to be listed on the National Register of Historic Places, a resource may maintain enough integrity to be listed on the CR.

Local

General Plan

Conservation Element: The City's General Plan establishes goals for aesthetic resources, including the protection and reinforcement of natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations. The City General Plan contains

¹⁸ OHP is part of the California Department of Parks and Recreation (also known as State Parks).

regulatory guidance for the protection of visual resources in the community, such as building heights. The Conservation Element of the General Plan, Section 15: *Land Form and Scenic Vistas* (2001), identifies scenic views or vistas as “the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is from park lands, private and publicly owned sites and public rights-of-way” (p. II-47). The following policy from the Conservation Element is relevant to the proposed project:

Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view [sic] or other access to unique features or scenic views.

Framework Element: The Framework Element of the General Plan, Chapter 5, Urban Form and Neighborhood Design contains the following objectives relevant to the project:

Objective 5.1: Translate the Framework Element's intent with respect to citywide urban form and neighborhood design to the community and neighborhood levels through locally prepared plans that build on each neighborhood's attributes, emphasize quality of development, and provide or advocate "proactive" implementation programs.

Objective 5.5: Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Objective 5.6: Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan provides goals, objectives, policies and programs to effectively preserve, enhance, and maintain sites and structures which have been deemed culturally and/or historically significant within the City of Los Angeles, including:

Goal 14: A Community which preserves and restores the monuments, cultural resources, neighborhoods and landmarks which have historical and/or cultural significance.

Objective 14-1: To ensure that the Plan Area's significant cultural and historical resources are protected, preserved and/or enhanced.

Policy 14-1.2: Identify all designated City of Los Angeles Historic and Cultural

Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public by preserving Los Angeles' historic past and to promote that any other appropriate landmarks of unique architectural and historical significance continue to be identified for the purpose of inclusion in the list of sites which will be designated by the Los Angeles City Council as Historic and Cultural Monuments in the Northeast Los Angeles Community Plan Area.

Objective 14-3: To enhance and capitalize on the contribution of existing cultural and historical resources in the community.

Policy 14-3.3: Maintain the continued preservation of the unobstructed view from public locations of the unique natural formation of the Eagle Rock Program. The Plan designates the area immediately surrounding Eagle Rock for Low Residential and cluster type housing in order to preserve views of Eagle Rock.

Cultural Heritage Ordinance

In 1962, the City of Los Angeles created a comprehensive ordinance to address potential cultural resources in the City. As a part of the ordinance, the five-member Cultural Heritage Commission was created as the mayoral-appointed body that oversees the designation and protection of local landmarks. The City's Office of Historic Resources provides staff support to the Commission. The Heritage Commission has responsibility for designating as Historic-Cultural Monuments (HCMs) any building, structure, or site important to the development and preservation of the history of Los Angeles, the state, and the nation.

Designated HCMs in the Eagle Rock community include:

- Eagle Rock (multiple addresses);
- Eagle Rock City Hall (2031-2035 Colorado Boulevard);
- Old Eagle Rock Branch Library (2225 Colorado Boulevard);
- Eagle Rock Playground Clubhouse (1100 Eagle Vista Drive);
- Eagle Rock Women's Twentieth Century Clubhouse (multiple addresses, including 1841-1855 Colorado Boulevard);
- Eagle Rock Women's Christian Temperance Union House (2222 Laverna Avenue and 2225-2245 Norwalk Avenue).

Environmental Impacts

Methodology

Architectural historians from Jones & Stokes conducted a site visit/archaeological survey in late 2001 to assess the campus for significant cultural resources and prepared a Cultural Resources Report in 2003. Architectural Historians from KCK Architects undertook a detailed survey of the Swan Hall building in early 2010.

Significance Criteria

The criteria used to determine the significance of an impact are based on the Initial Study Checklist in Appendix G of the *CEQA Guidelines*.

For this analysis, the proposed project may result in significant impacts if it would:

- Substantially damage scenic resources, including, but not limited to, trees and historic buildings;
- Cause a substantial adverse change in significance of a historical resource;
- Cause a substantial adverse change in the significance of a unique archaeological resource;
- Disturb any human remains, including those interred outside of formal cemeteries; or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The *CEQA Guidelines* define a significant impact as one that would cause “a substantial adverse change” defined in *CEQA Guidelines §15064.5(4)(b)(1)* as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The significance of an historical resource is materially impaired when a project (§15064.5(b)(2)):

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to §5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of §5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Substantial adverse changes include both direct impacts to a historic resource as well as indirect impacts to the immediate surroundings of the resource.

Examples of direct impacts include:

- Physical destruction of, or damage to, all or part of an historical resource.
- Alteration of an historical resource, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access that is not consistent with the *Secretary of the Interiors Standards* and applicable guidelines or technical advisories.

Examples of indirect impacts to the immediate surroundings of the resource include:

- Change of the character of physical features within the historical resource’s setting that contribute to its historic significance.
- Introduction of visual, atmospheric or audible elements that diminish the integrity of an historical resource’s significant historic features.

The *CEQA Guidelines* indicate: “Generally, a project that follows the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995)*, Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.” (*CEQA Guidelines* § 15064.5(b)(3))

The Secretary of the Interior’s Standards are intended to promote responsible preservation practices that help protect historically significant cultural resources. While the Standards cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed, they provide philosophical consistency to the work.

There are four treatments, Preservation, Rehabilitation, Restoration and Reconstruction:

- Preservation focuses on the maintenance and repair of existing historic materials and retention of a property’s form as it has evolved over time. New exterior additions are not within the scope of this treatment.
- Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property’s historic character.
- Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.
- Reconstruction re-creates vanished or non-surviving portions of a property for interpretive purposes.

The appropriate treatment for the renovation of Swan Hall is that of Rehabilitation since this treatment is defined as “the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” The *Secretary of the Interior’s Standards for Rehabilitation*, emphasizes retention and repair of historic materials, but provides latitude for replacement because it is assumed the property is more deteriorated prior to work.

The *Secretary of the Interior’s Standards for Rehabilitation* are:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Compliance with the *Secretary's Standards* indicates that the proposed project would have a less than significant impact on an historical resource. However failure to comply with the *Secretary's Standards* is not necessarily a significant impact under CEQA as there could be alterations that are not consistent with the *Secretary's Standards* but do not result in any material impairment to character defining features and thus the historical resource. In that case there would be a less than significant impact.

A project that affects what has been identified as an historic resource that is not in conformance with the *Secretary's Standards* and results in a material impairment is generally considered to have a significant impact.

Proposed Project Impacts

Scenic Resources

The proposed project could substantially damage a scenic resource (Swan Hall and some large trees in the immediate vicinity of the building). CEQA references scenic resources that are in the vicinity of scenic highways and while Occidental College is not in the vicinity of a scenic highway, nonetheless Swan Hall is a scenic resource that is appropriately addressed in this CEQA document.

Impacts to Character Defining Features and Compliance with Standards

The following **Table 3A-3** identifies proposed changes to each of the character defining features identified in the Environmental Setting above.

**TABLE 3A-3
SWAN HALL PROPOSED CHANGES TO CHARACTER DEFINING FEATURES**

Swan Hall Character-Defining Feature	Proposed Project
Structural -- hollow clay tile	Removal of all hollow clay tile, interior and exterior.
Exterior plaster and cast details	Removal of all exterior cladding including architectural features such as quoins (corner details), window and entry door surrounds. Reconstruction with all new materials.
Windows	Windows including frames would be removed and salvaged for repair and reinstallation. Two small windows on west omitted.
Doors, east elevation	Original doors removed and reinstalled. Entry surround demolished and reconstructed. Middle Swan doors would be inoperable due to interior reconfiguration.
Doors, west elevation	Original doors removed and entry surround demolished. New passage through to addition.
Roof	Roof tile on Swan Hall would be removed and reinstalled. The new addition to the west would overlap and cut into portion of original roofline and eave trim.
Overall resource integrity	Original façade and deco elements mostly removed and demolished
Overall resource identity	New addition (connecting structure) overlaps and subsumes original smaller building.
Trees on parcel to west	Trees removed for new building wing.

The proposed changes to Swan Hall are analyzed below, as a whole, for compliance with the Secretary of the Interior's Standards for Rehabilitation. It is the overall analysis that determines whether or not the project would comply with the standards:

Standard 1. Swan Hall was adapted from a residential dormitory use to academic offices in 1960, both uses that supported the residential college's educational mission. The 1960 project reconfigured interior spaces. The current project again would reconfigure the interior to support ongoing academic requirements. The proposed project continues a use that supports the purpose of the College's historic mission. In addition, there is little original historic fabric in the building's interior, so the proposed changes would not impact any historic interior features. The proposed project would comply with Standard 1.

Standard 2. The proposed project would remove all exterior cladding and in-fill (dual walled) hollow-clay tile. This would result in the loss of all exterior features. Roof tiles, windows and doors would be removed and reinstalled. The project includes the documentation and reconstruction of the building with reconstruction of all exterior features. All original exterior features and materials are proposed to be removed. Removal of window frames for re-use would likely lead to more loss of original material. With the removal of all of the distinctive exterior materials, the proposed project would not comply with Standard 2. The proposed project retains use of the two re-built flanking east façade entryways on the quadrangle. The central more decorative entry with a panel reading "James Swan Hall" would no longer provide access. The original west entry will be removed and reconfigured for a direct connection to the new addition. The opening sizes will be modified and the decorative surround omitted.

Standard 3. The proposed project includes reconstruction of the building's exterior. The reconstruction would be based on an accurate replication of exterior features and thus would not be conjectural. However, with all original exterior historic fabric removed the

building would no longer be a physical record of its time, place and use and would not comply with Standard 3.

Standard 4. The building's exterior has original historic features and materials except for a few areas that underwent repair after an earthquake (1994). However, major changes occurred in the interior of the building that was reconfigured from residential rooms to offices. The spatial planning of the offices or the utilitarian materials have not acquired historic significance as they are not of an architectural or aesthetically significant design and while they have performed a yeoman's job of providing office space there is no historic significance that has been achieved by ordinary use of these interior spaces. Like other colleges and universities, many dedicated teachers and researchers taught on campus and worked out of offices on campus such as those in Swan Hall. The buildings that house these offices (including Swan Hall) also serve to educate and inspire students, many whom have continued on to make significant and transformative scientific, societal, artistic and economic achievements. As stated in *National Register Bulletin #32, Guidelines for Evaluating and Nominating Properties Associated with Significant Persons* "the fact that we value certain professions or the contributions of certain groups historically does not mean that every property associated with or used by a member of that group is significant." In order for the association of a building with a specific person to be found significant, "the accomplishments of specific individuals whose significance is associated with the property must be demonstrated to justify the significance." A comprehensive study of the historical accomplishments of the faculty and staff of Occidental College and comparative analysis to others is not included herein. As Swan Hall is already considered a contributing building to a National Historic District in terms of its architectural significance, such an analysis is not necessary at this time. It is noted that Jack Kemp '57 lived in Swan Hall his freshman year while it was still a men's dormitory; Barack Obama '83 took an English seminar there. Bob Winter, Arthur G. Coons Professor of the History of Ideas, Emeritus, had his office in Swan Hall while teaching at Occidental. Standard 4 is not applicable to the proposed project as there are no changes to the property that have acquired historic significance.

Standard 5. The proposed project would remove and recreate all original exterior features and materials, except for windows, doors, and roof tiles that would be reinstalled. As such none of the building's distinctive materials, features, finishes and construction techniques that characterize the building would be retained and preserved. While replacement of portions or individual elements of a resource is permissible when damaged, it is only after repair techniques have been thoroughly investigated and proved infeasible. Not only does the proposed project remove almost all exterior material including decorative entryways, window surrounds and other façade details, the retention and reinforcement of the existing exterior is not infeasible, thus, this aspect of the proposed project would not comply with Standard 5. For review of the cost of the project, a peer review of the Architect's cost estimate that compares the proposed scheme and the preservation scheme has been undertaken under separate cover. To a degree based on detailing in the documents and reliance on modern construction and typical project bid and construction methodology, the new construction may also only be a close simulation of the original features and may not fully accomplish a precise replication of existing details and features. The proposed project also includes realignment of the interior system of multiple floor planes. The split-level system is original to the building but it has become an artifact that impedes universal/ADA access throughout the building. While the split-level concept would not be experienced within the building anymore, the concept would remain visible on the north and south

exteriors of the building by the offset window heights that would be visible in both the north and south elevations. As this interior change is limited to a secondary historic feature and provides ADA access, this aspect of the project would comply with Standard 5.

Standard 6. This Standard provides a hierarchy of treatment stating that deteriorated historic features should be repaired rather than replaced and only when the deterioration is severe should replacement/replication be considered. The hollow clay tile structural system is fragile and would be replaced as would the exterior cladding that is attached to the tiles. This would result in all historic materials being removed. (If a substantial portion of the exterior with its historic features and finishes could be retained, the replacement of the hollow clay tiles, which is internal and not visible, could be possible which would meet Standard 6.) With the removal of all exterior elements, when there are available methods of retaining and securing existing materials in place, the proposed project would not meet Standard 6. The applicant finds that retaining exterior features would result in a significant cost that would result in less monies being available for other aspects of the College.

Standard 7. This Standard pertains to potential chemical or physical treatments that have the potential to cause damage to historic materials. The physical treatments deal with applications. As the current project includes removal of all exterior historic materials, there would be no treatments applied to the original exterior materials. Thus, this Standard does not apply to this project.

Standard 8. This Standard deals with archeological resources. As the original building site and foundation would remain this Standard is not applicable to that site. The location of the addition is an area that could have the potential for archeological resources but previous environmental reviews of the campus indicate that the potential for archeological resources is low. However, if any archeological resources were identified, the project would be required to conduct appropriate mitigation.

Standard 9. This Standard concerns the possible changes from additions and alterations including minimizing loss of historic materials and differentiation of old and new while providing a compatible addition. With respect to alterations, as mentioned previously, in the proposed project, all exterior materials are to be removed (with re-use of windows and roof tiles) while re-creating the original building. The central entry on the east would no longer function. A new building is proposed to the west of Swan Hall which would be attached to Swan Hall at the center of its west façade by a narrow building element (about 30 feet wide covering the middle portion of the west façade of Swan Hall and connecting to the new structure; the main new structure would be 26 feet from the existing Swan Hall). The connecting structure would overlap/cut into the Swan Hall roofline. This connecting structure would cover and modify the existing decorative entry portal and layout on the west (the doors and surrounds would be removed and modified for internal circulation to the connecting structure) and obscure the differentiation and decorative treatment of the central part of the west tripartite elevation. In terms of the main part of the new building, the overall height and size are not in isolation in conflict with this Standard since the new structure is moved 26 feet away from the original building and further from the view from the Quadrangle. The new structure would be visible from the Quadrangle (especially from the buildings across the quadrangle). Also, the removal of the large trees would change the context of the building somewhat. However it is the height of the connecting structure and the matching sloping roof overlapping the original building that subsumes the smaller

building so that it no longer retains its separate identity that results in overshadowing of Swan Hall by the larger addition. As a result of the connecting structure element, the proposed project would not meet this Standard. The new building facade would be generally compatible stylistically to the original building.

Standard 10. Excluding the project's proposed removal of all exterior materials, the new addition would leave the existing exterior design generally unchanged, except for the central area of the west façade where the new connecting structure is located. This area contains the only entry on the west and features a plaster decorative surround. (With additional effort to maintain the original roofline of and decorative detail at this location, the project could otherwise meet Standard 10.) The proposed scheme includes a new floor slab at a level that is above the original main entry door threshold on the Quadrangle (east facade) that would block use of the central doors. The doors would be retained in place; at a future date the slab could be modified to allow for use of the doors. Thus this change could be reversible and therefore potentially consistent with this standard, although for the project as a whole this standard would likely not be met because of the change to the west façade and removal of all original materials. There are also remaining elements of the original exterior stair from the deck on the west in the landscape that would be removed for the new building. A new doorway would also be cut into a window bay in Swan Hall to access the basement.

The proposed project would not meet Standards 2, 3, 5, 6 and 9 and likely not Standard 10. The major issues are: removal of all exterior materials with only partial reuse; design of the connecting element of the addition to Swan Hall; and modification to original entryways. As such the project is not in conformance with the *Secretary of the Interior's Standards for Rehabilitation* and it will result in material impairment of most of the exterior building material and as such will result in a significant adverse impact to the historical resource, Swan Hall.

Individual resources contributing to the significance of the Historic District are also listed in the California Register. For this reason, all individual resources located within the boundaries of an historic district must be designated as either contributing or as noncontributing to the significance of the historic district. Swan Hall has been determined to be a contributing resource to the Historic District. As proposed, the Swan Hall rehabilitation project would materially impair the integrity of materials and setting from the building's period of significance and therefore would cause a substantial adverse change to the significance of the resource. There is no formula regarding when an historic district loses its historic integrity as a result of loss of contributing resources. In terms of numbers, the loss of one of seventeen contributing buildings should not result in the loss of district historic integrity. However, Swan Hall's location on the historic quadrangle could arguably have more of an impact than that of an outlying building. Even with a greater impact, and no historic buildings on the west side of the quadrangle, the relationship of the buildings on the east side and north appear to communicate the historic setting sufficiently to retain the Historic District's integrity and eligibility. Therefore, although the proposed project would cause a substantial adverse change to one contributing building -- Swan Hall, the proposed project would not cause a substantial adverse change to the significance of the entire historic district. The Occidental College Historic District would continue to be eligible for the California Register of Historical Resources after the project is implemented.

General Plan

The project would be consistent with the Conservation Element policy encouraging retaining the character and landforms of the site. The project would be consistent with Framework policies regarding neighborhood design, upgrading the quality of development, reinforcing community character, and reinforcing strong pedestrian orientation and safety. The project would continue the existing high-quality college use and atmosphere. The building addition would be of high quality complementary to the existing buildings and neighborhood. The existing pedestrian orientation would be maintained.

Northeast Los Angeles Community Plan Consistency

In general, the Occidental College Specific Plan conforms to the Northeast Los Angeles Community Plan's applicable objectives and policies for historic preservation, as outlined in **Table 3A-4**, below.

**TABLE 3A-4:
CONSISTENCY WITH THE NORTHEAST LOS ANGELES COMMUNITY PLAN**

Policy and/or Objective	Consistency Analysis
Objective 14-1: To ensure that the Plan Area's significant cultural and historical resources are protected, preserved and/or enhanced.	Potentially Consistent: The project would retain the Swan Hall structure so that it appears as it does today, but it would not comply with the Secretary of the Interior's Standards.
Policy 14-1.2: Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public by preserving Los Angeles' historic past and to promote that any other appropriate landmarks of unique architectural and historical significance continue to identified for the purpose of inclusion in the list of sites which will be designated by the Los Angeles City Council as Historic and Cultural Monuments in the Northeast Los Angeles Community Plan Area.	Not applicable. The proposed project is not a designated Historic and Cultural Monument and is not occupied by designated Historic and Cultural Monuments.
Objective 14.3: To ensure that the Plan Area's significant cultural and historical resources are protected, preserved, and/or enhanced.	Potentially Consistent: The project would retain the Swan Hall structure so that it appears as it does today, although it would not comply with the Secretary of the Interior's Standards.
Policy 14-3.3: Maintain the continued preservation of the unobstructed view from public locations of the unique natural formation of the Eagle Rock Program. The Plan designates the area immediately surrounding Eagle Rock for Low Residential and cluster type housing in order to preserve views of Eagle Rock.	Not applicable. The Occidental College campus does not obstruct views of Eagle Rock.

Cumulative Impacts

The potential Occidental Campus Historic District consists of 23 contributing resources, 17 buildings and six other features. The contributing buildings include: Johnson Hall; Fowler Hall; Mary Norton Clapp Library; Swan Hall; Thorne Hall; Booth Music-Speech Center; Freeman College Union; Samuelson Campus Pavilion; Weingart Center (Orr Hall); Collins House Admissions Building; Urban & Environmental Policy Institute; Bird Hillside Theater; President's House; Erdman Hall; Haines Hall; Emmons Health Center; Wylie Hall. The six other features include: Patterson Field; Campus Quadrangle; Perimeter landscaping; circulation

network/landscaping; Alumni Avenue (east of Campus Road); and Pardee and Thompson Gates). These resources all date from the identified period of significance, 1910-1940 that coincides with the first 30 years of campus development under the guidance of architect Myron Hunt.

Within the last three years three residence halls on campus have undergone seismic upgrades and repair: two buildings -- Erdman and Wylie Halls were both designed by Myron Hunt. The third residence hall, Bell-Young, was built in the 1950's. Erdman included replacement of the exterior plaster as part of the seismic upgrade and rebuilding of the crumbling front entry columns as well as other exterior repairs. Wylie seismic work was completed from the interior. Erdman and Wylie also received new roofs; Erdman's roof was partially replaced using the same tiles supplemented with tiles from Wylie. Bell-Young included addition of architectural features reflective of the rest of campus. All three projects had major plumbing and HVAC upgrades, restroom renovations and accommodations made for access (ADA). These renovations did not require discretionary permits, and were therefore exempt from CEQA.

The proposed project would result in the loss of a majority of the original historic elements and materials of Swan Hall. As such, the reconstructed building, while conforming with the historic aesthetic of the Historic District, would no longer be an original contributing building to the Historic District. While the loss of a contributing building is a significant adverse impact, there would not yet be a cumulative loss to the Historic District and the District would not lose its potential status as a Historic District.

The project would result in the loss of one Myron Hunt-designed building, 16 others remain on the campus retaining their original historic materials. The loss of this one building could set a precedent for how other buildings on campus will be treated as time goes by. The loss of additional contributing buildings on campus due to removal of historic materials or demolition could have a cumulative negative impact on the campus historic district.

Other Myron Hunt designed buildings in Southern California have been demolished, but a significant number of buildings remain. The book, Myron Hunt, 1868-1952: The Search for A Regional Architecture, includes a chronological list of the buildings designed by Myron Hunt between 1895 and 1947. Between the years of 1903 when he first designed buildings in California and 1947, over 250 Southern California projects are listed. While the list does not include data as to which have been demolished, it is reasonable to assume that most of the buildings remain. Even if half of the buildings had been demolished, that would leave at least 125 extant buildings. Thus, the loss of one additional Myron Hunt building would not be a cumulatively considerable contribution to a cumulative impact.

Mitigation Measures

All of the following mitigation measures are required to reduce potential impacts to scenic and historic resources.

Measure 3A.1: Archival photographic documentation. Prior to any demolition, fence enclosure or board-up, Occidental College should prepare full building archival photo documentation similar to HABS Level II guidelines with minimum 2-1/4" negative and 8 x 10 archivally processed black and white prints. The photography should be extensive including overall views, exterior façade, interior and details. The documentation will also include outline narrative information about the building and copies of original drawings.

Two original hardcopies and electronic versions on media such as CD shall be prepared. One hardcopy and electronic file shall be deposited with the Los Angeles Public Library and the other should be retained by Occidental College.

Measure 3A.2: As-built Documentation. The project implementation team for Occidental College shall provide extensive documentation of the existing building for rehabilitation and replication. Field measurements including detailed drawings of openings and decorative elements will be necessary for reconstruction of historic elements. These dimensions and drawings should be part of the documents used for bidding and construction. Use of laser imaging or other technique may support the effort although final documentation should be in a format that is typically used for bidding and construction.

Measure 3A.3: Inventory Procedures. The project implementation team for Occidental College shall provide Construction Documents that include specifications for documentation and inventory procedures to record condition and location of each item that is removed and to be re-installed. Contractor should photo document and inventory all items. A secure and appropriately protected area is to be designated by the Contractor in cooperation with the College for storage of items for re-use.

Measure 3A.4: Design and Construction Monitoring. Occidental College shall engage a qualified historic preservation consultant reviewer/monitor with at least 5 years practical experience in evaluation and application of historic preservation construction techniques in projects of similar size and scope, the monitor shall also meet the National Park Service standards for qualified preservation architect with at least 10 years experience in design review and collaboration for application of the Secretary's Standards and Guidelines. During the remaining design, documentation and plan review phases, the reviewer/monitor should review the proposed design, and make suggestions as to where preservation elements can be more fully integrated according to the Standards, particularly for the design issues and features outlined in this evaluation. Furthermore, the reviewer/monitor shall review and comment on treatments for rehabilitation, reconstruction and new construction and shall comment upon whether the design, documentation and construction is implemented in accordance with the mitigation measures contained in the Draft EIR and with accepted professional preservation practice. Prior to approval of final construction plans, the reviewer/monitor shall submit a report to Occidental College and the City Planning Department summarizing critical historic preservation issues and addressing unforeseen circumstances. The reviewer/monitor shall also outline the role he/she will play during construction. Occidental College shall complete construction in a manner consistent with the historical preservation report as adapted and final construction plans. The reviewer/monitor will periodically monitor construction for consistency with the historic preservation report and final construction plans, and will participate in regular and special pre-construction meetings as well as regular construction meetings with the project implementation team.

The following measures were identified in the Initial Study to ensure a less than significant impact on other cultural resources:

Measure 3A.5: Archaeological Resources and Human Remains. If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or human bone, are inadvertently discovered during ground-disturbing activities, work shall cease in

that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with Occidental College, the City, and other appropriate agencies.

If any archaeological materials are encountered during the course of the project development, the project shall be halted, and the services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report shall be submitted to the South Central Coastal Information Center (SCCIC) at Cal State Fullerton. A covenant and agreement reflecting this measure shall be recorded prior to obtaining a grading permit.

Any potentially significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Measure 3A.6: Human Remains. In the event of discovery or recognition of any human remains on the site, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of Los Angeles County has been contacted, per Section 7050.5 of the California Health and Safety Code. If the coroner determines that the human remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

- a. The coroner of the County has been informed and has determined that no investigation of the cause of death is required; and
- b. If the remains are of Native American origin,
 1. The descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
 2. The Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission.

Measure 3A.7: Paleontological Resources. If any paleontological materials are encountered during the course of the project development, the project shall be halted, and the services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. A covenant and agreement reflecting this measure shall be recorded prior to obtaining a grading permit.

Significant Impacts after Mitigation

The proposed project would have a significant and unavoidable impact with respect to historic resources (Swan Hall).