

CHAPTER 2: COMMENTS ON THE DRAFT EIR

List of Commenting Agencies, Organizations and Individuals

The public comment period for the Draft EIR extended from October 7, 2010 to November 22, 2010. The table below lists all letters received on the Draft EIR.

Letter No.	Organization	Commenter Name	Comment Date	Response Page Number
1	City of Los Angeles Wastewater Engineering Services Division, Bureau of Sanitation	Ali Poosti, Acting Division Manager	October 27, 2010	3-1
2	The Eagle Rock Association	Robert F. Gotham, President	October 27, 2010	3-1
3	Los Angeles Conservancy	Linda Dishman, Executive Director	November 22, 2010	3-2
4	Highland Park Heritage Trust	Carmela Gomes, President	November 20, 2010	3-2
5	Private Consultant and Resident	Frank F. Parelo	November 20, 2010	3-3
6	Historic Highland Park Neighborhood Council	Chris Smith, President	November 15, 2010	3-7
7	State Clearinghouse, Governor's Office of Planning and Research	Scott Morgan, Director	November 23, 2010	3-7

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: October 27, 2010

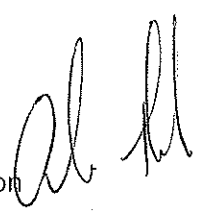
TO: Diana Kitching, Environmental Review Coordinator
Environmental Review Section
Department of City Planning

RECEIVED
CITY OF LOS ANGELES

NOV 03 2010

ENVIRONMENTAL
UNIT

FROM: Ali Poosti, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation



SUBJECT: Swan Hall Renovation and Addition Project – Draft EIR

This is in response to your October 7, 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

1-1

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 connects 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.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

SUSMP AND STORM WATER INFILTRATION

The proposed project is subjected to Standard Urban Stormwater Mitigation Plan (SUSMP) regulations. The proposed project is required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm. It is advised that input regarding SUSMP requirements be received in the early phases of the project from SUSMP review staff.

WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

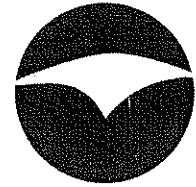
Attachments: Wet Weather Erosion Control

cc: Kosta Kaporis, BOS
 Daniel Hackney, BOS
 Rowena Lau, BOS

1-1
 cont.

1-2

TERA



THE EAGLE ROCK ASSOCIATION

Invest in your community

October 27, 2010

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

RECEIVED
CITY OF LOS ANGELES

NOV 02 2010

ENVIRONMENTAL
UNIT

Re: Public Comments Swan Hall / Draft EIR

Dear Ms. Kitching:

The following comments regarding the proposed redevelopment of Swan Hall located on the Occidental College Campus are provided on behalf of The Eagle Rock Association.

Our initial comments are based in consideration of the potential larger community impact that may be realized as a result of this development at Occidental College. Based on the following understandings, we do not anticipate a negative community impact.

- College population (students and faculty) will not be increased as a result of the redevelopment of Swan Hall.
- The transition between the surrounding community and the campus will not be impacted by this project.

2-1

Reviewing the project from the aspect of historic preservation provokes considerable concern. As acknowledged within the EIR, Historical Standards 2, 3, 5, 6, 9 and potentially 10 are not met. Failing to meet this number of standards constitutes a significant negative impact. The proposed rehabilitation approach raises questions regarding the College's true dedication to historic preservation. It would be TERA's hope that the College would make budgetary compromises in order to more fully comply with the historic preservation standards established by the Secretary of the Interior's Standards for Rehabilitation.

Thank you for this opportunity to comment.

Respectfully,

Robert F. Gotham, President

Cc: Linda Dishman, Los Angeles Conservancy - ldishman@laconservancy.org
Jose' Huizar, Council Representative / CD14
Michael Larsen, Eagle Rock Neighborhood Council
James Tranquada, Occidental College



November 22, 2010

Submitted electronically

Ms. Diana Kitching, Environmental Review Coordinator
Los Angeles 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 Project, Occidental College –
Draft EIR (ENV-2010-0653-EIR)**

Dear Ms. Kitching:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the Swan Hall Renovation and Addition project at Occidental College, and the need for consideration of preservation alternatives as part of the ongoing environmental review process. 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.

In April, the Conservancy submitted a comment letter on the Notice of Preparation detailing our concerns about the proposed project jeopardizing Swan Hall's continued eligibility as a contributing structure in a potential California Register-eligible historic district on Occidental's campus. Designed by Myron Hunt and built in 1912-1914 as a dormitory, Swan Hall was one of the first three buildings constructed for the college's new Eagle Rock campus. Reflecting the construction technology of the early 20th century, Swan Hall incorporates hollow clay tile as infill for its structural concrete frame. Hailed for its fireproofing properties, hollow clay tile has some limitations, primarily in regard to seismic stability. The project proposed the wholesale removal of the material, a particularly destructive, and what we believe to be an unnecessary method for addressing the seismic safety of Swan Hall. Not only would this invasive approach result in the loss of virtually all historic fabric, including exterior stucco and decorative details, it would not conform to the Secretary of the Interior's Standards for Rehabilitation (the Standards) and would thus constitute a significant adverse impact on historic resources under the California Environmental Quality Act.

Following the NOP, the Conservancy requested a meeting with Occidental College to explore feasible alternatives that would retain Swan Hall's historic status while meeting the project's seismic safety and use requirements. Our primary goal is to ensure Swan

3-1

Hall's continued eligibility as a historic resource. To that end, the Conservancy invited David Cocks, a structural engineer with Structural Focus, to attend a meeting in September with members of the project team and provide his *pro bono* expertise and extensive experience with similar historic buildings.

In a follow up meeting on November 2, 2010, the Conservancy was pleased to learn the college had revised its plans and decided to adopt a preservation alternative as the preferred project for Swan Hall. The Conservancy understands that the revised project will be similar to Alternative 2 in the Draft EIR, where the exterior layer of the hollow clay tile will be properly anchored with steel supports concealed behind the original walls, and concrete shear walls strategically inserted. Additional structural strengthening will occur at Swan Hall's north and south elevations (the shorter ends), as substantial damage and inappropriate repairs following the 1994 Northridge earthquake have compromised the hollow clay tile and historic fabric at these elevations. In addition, all three doors on the east (quad) elevation will remain operational, including the center door.

The Conservancy urges further investigation to evaluate the extent of damage and alterations at the north and south elevations, and retention of any remaining historic fabric if feasible. Nonetheless, we concur with the college's preservation consultants that the project, as revised, does meet the Secretary of the Interior's Standards for Rehabilitation and maintain Swan Hall's status as a historic resource.

The Conservancy commends Occidental College and its project team in modifying its approach and adopting a preservation alternative as the preferred project for Swan Hall. As the steward of numerous historic and cultural resources, we applaud Occidental College for its commitment to the school's rich architectural heritage. We look forward to reviewing the revised project in the Final EIR and working with Occidental College on its master plan and future projects at its campus.

Please feel free to contact me at (213) 430-4205 or ldishman@laconservancy.org should you have any questions or need additional information.

Sincerely,



Linda Dishman
Executive Director

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

Nov. 20, 2010

Via Email & Mail
Diana.Kitching@lacity.org

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

**Re: Written Response to DEIR for Swan Hall Renovation and Addition, Occidental College
ENV-2010-653-EIR; State Clearinghouse No. 2010041044; Council District 14
Project Address: 1600 Campus Road**

Dear Ms. Kitching:

The Highland Park Heritage Trust has reviewed the DEIR for the Proposed Project located at Occidental College. Our organization cannot support the project as proposed by Occidental College. By no means does this diminish the needs of the college or our support and ongoing collaboration with the College to achieve the common goal of preserving one of the original Myron Hunt-designed buildings that “would constitute the College’s early architectural vocabulary”.

4-1

The College and the City of Los Angeles previously recognized Swan Hall as an historic resource, under CEQA, as a contributing structure to an identified historic district. However, the proposed renovation and addition does not meet the Secretary of Interior’s Standards for Rehabilitation. Furthermore, our opposition to the proposed project is based on the project’s selected design solutions and not the programmatic needs of the College.

These impacts to an eligible historic resource and to the historic district cannot be mitigated to less than a significant impact under CEQA. The following are our concerns which specifically relate to Section 3A and 4 of the DEIR:

- The DEIR does not state which California State Structural code is being applied to the existing building. The conclusions are inadequate if the analysis was done under any other code than SHBC (State Historic Building Code.)
- The analysis of significance and adverse and cumulative impacts should be based upon Swan Hall being an individual historic resource as well as a Contributor to the historic district. This was previously commented upon in various NOP letters and is substantiated by experts including Jones & Stokes (Cultural Resource Study, Appendix B), Los Angeles Conservancy (NOP Comment letter dated May 24, 2010), and Occidental College’s adopted Master Plan (Page 1:2). Page 17 of Jones & Stokes’ Cultural Resource Study, although done for a separate reason, illustrates the individual significance of Swan Hall: “Stylistically it may be seen as an example of Hunt’s “Californian” idiom. (also in DEIR Table 3A-1). Combined with the statement of significance, “The evolution and maturation of Myron Hunt’s “Californian” style can be seen at Occidental College,”

4-2

4-3

discusses its importance as an individual historic resource. The DEIR fails to analyze the adverse and cumulative impacts to Swan Hall in this regard and omitted that request for review and analysis from our NOP letter.

4-3
cont.

- Areas of concern as previously discussed (NOP comment letter) have not been addressed or revised:

- Conserving/ preserving the building’s exterior historic materials – plaster, windows and cast-stone ornamentation.
- Maintaining the primary entrance from the quad or courtyard.
- Creating a contextual addition that relates to the size, location and massing of the historic district and the adjacent building.
- Reducing the height of the new addition lower than historic structure.
- Redesign of the connection between the addition and the existing building.

4-4
4-5
4-6
4-7
4-8

During our meeting on April 12, 2010, the proposed project architect, Brian Bloom, stated that the proposed project followed and met the Rehabilitation Standards. Yet, the project does not meet Standards Nos. 2, 3, 5, 6, 9 and 10.

4-9

As stated in our previous letter in response to the NOP, the applicant appears to not be interested in saving time and potentially money by taking the project in a direction that would fully comply with the Rehabilitation Standards 1-10. In meeting the Standards, an EIR could have been avoided and a historic resource would be preserved within its historic context.

4-10

Furthermore, Occidental's Board-of-Trustees-approved Master Plan is never referenced in the DEIR and therefore should be fully incorporated into the record for this discretionary action. <http://www.oxy.edu/Documents/masterplan/final-report.pdf> This is a key document that should be the basis upon which the proposed project’s objectives were originally determined. There are inconsistencies between the project objectives (“to preserve the historic Swan Hall Building in a cost effective manner...”) and the College’s Master Plan Principals (“Affirm a historic-preservation based plan as a key long-term approach”) and Big Idea 1 (“Restore and adaptively reuse existing buildings.... All design work should be executed under the Secretary of the Interior’s Standards for Rehabilitation.”)

4-11

We want to encourage the College to further explore the Project Alternatives, and to set a sensitive, contextual precedent for this project and for the remaining historic structures on the campus.

Thank you for considering our response and comments to the DEIR for the Swan Hall Project.

Sincerely,

Carmela Gomes
President

cc: Board of Directors, HPHT
Councilmember Jose Huizar

Historic Highland Park Neighborhood Council
The Eagle Rock Association
Eagle Rock Neighborhood Council
Los Angeles Conservancy

Attachment: Board of Trustees-adopted Occidental College Master Plan, selected pages

MAY 8, 2006

OCCIDENTAL COLLEGE MASTER PLAN
EAGLE ROCK, LOS ANGELES, CALIFORNIA



Prepared by:
Moule & Polyzoides Architects and Urbanists
Van Atta Associates
Nelson / Nygaard Associates
Psomas
Syska Hennessy Group
Environmental Planning & Design
Historic Resources Group

MISSION *The mission of Occidental College is to provide a gifted and diverse group of students with a total educational experience of the highest quality one that prepares them for leadership in an increasingly complex, interdependent and pluralistic world. The distinctive interdisciplinary and multicultural focus of the College's academic program seeks to foster both the fulfillment of individual aspirations and a deeply rooted commitment to the public good.*

This mission is anchored by four cornerstones: excellence, equity, community and service. These building blocks, in one form or another, have long been the basis for the College's commitment to providing responsible leaders and citizens for our democratic society. Choosing them to support the future helps to ensure that the College remains true to its mission while adapting to a changing world.

OCCIDENTAL COLLEGE 1600 Campus Road
Los Angeles, California 90041

Catherine Selleck, Chair, Board of Trustees
David Berkus, Chair, Building & Grounds Committee
Kenyon Chan, President (Interim)
Harold Hewitt, Vice President for Administration and Finance
Eric Frank, Dean of the College (Interim)
Jim Tranquada, Director of Communications

CONSULTANT TEAM
URBAN DESIGN AND ARCHITECTURE

Moule & Polyzoides Architects and Urbanists
180 East California Boulevard
Pasadena, California 91105
Stefanos Polyzoides, Principal Architect spolyzoides@mparchitects.com
David Thurman, Project Architect dthurman@mparchitects.com
Jason Claypool
Jim Kumon
Alan Loomis
Kithinji Mwirigi
Peter Vanderwal
Francisco Arias

LANDSCAPE Van Atta Associates
235 Palm Avenue
Santa Barbara, California 93101
Susan Van Atta sva@va-la.com
Guillermo Gonzalez

PARKING AND TRANSPORTATION Nelson/Nygaard Associates
785 Market Street, Suite 1300
San Francisco, California 94103
Patrick Siegman psiegman@nelsonnygaard.com
Ria Hutabarat

GREEN BUILDING STANDARDS Syska Hennessy Group
11500 West Olympic Boulevard, Suite 680
Los Angeles, California 90064-1524
Rob Bolin rbolin@syska.com

SUSTAINABILITY Environmental Planning & Design
411 North Harbor Boulevard #304
San Pedro, California 90731
Bill Wilson billwilsonwater@earthlink.net

CIVIL ENGINEERING Psomas
28470 Avenue Stanford, Suite 300
Santa Clarita, California 91355
Ross Barker rbarker@psomas.com

HISTORIC CONSULTANT Historic Resources Group
1728 Whitley Avenue
Hollywood, California 90028
Christy McAvoy christy@historicla.com
Paul Travis

SPECIAL THANKS TO Theodore Mitchell, President Emeritus

BOARD REVIEW DATE December 6, 2005

CHAPTER 1 : INTRODUCTION

PLAN PURPOSE

Why create a master plan? - For over a year Occidental College has engaged in a broadly inclusive planning effort in order to document a future for its facilities that first and foremost furthers its academic mission, is responsible to the communities that it serves, and will guide the College's response to civic planning and related regulatory requirements. There are few documents which are more comprehensive or informative than an effective master plan. The process of framing such a plan places a premium on gauging needs of various kinds: the assessment of existing facilities, the demand for new ones, the response to experienced growth and the anticipation of future changes. It also facilitates the adjustment of existing and often outdated plans. In Occidental's case, the most recent master plan was completed over 10 years ago in 1993, a plan which did not go through the City land use approval process. The entitlement of the new master plan with the City of Los Angeles will allow the College to meet the challenge of meeting future needs through 2025.

How to approach the master plan? - The creation of a useful master plan requires understanding the nature of an institution, making calculations regarding its future needs, and setting out a method of satisfying them. For 118-year-old Occidental College (located in Eagle Rock since 1914), **the master planning effort requires a balancing of its traditions with an informed inquiry into its future.** A master plan should benefit from the College's ample experience related to the planning and operation of the campus over the course of a century while absorbing successive generations of academic and physical change. This experience gives the plan an appropriate context, reflective character and historical perspective.

What were key goals for the College in embarking upon the master plan? - As articulated by its leadership, the key objectives for the College's master plan process are:

- **To guide the physical development of Occidental for the next two decades, integrating the fiscal planning already being done with future capital campaigns;**
- To incorporate a process of environmental stewardship;
- To prioritize the construction of projects;
- To enhance the campus's physical identity both within the campus and to the outside community;
- To provide illustrative visions for the plan in recognition that the plan is a development tool rather than a set of architectural designs; and
- To obtain City of Los Angeles entitlements to complete the projects proposed by the master plan.

The ultimate goal of the master plan is to create a "living document" which can serve as a foundation for Occidental's future. Consistent with the College's enduring vision of itself as a small liberal arts institution, the master plan is primarily intended to enhance programs and facilities rather than enlarge the student population.

What is the master plan process? - The master plan was a year-long effort designed to seek comments from all parties who may have an interest in the College's future. The six-phase process from February to December 2005 included extensive public meetings with students, staff, faculty, administration, trustees, alumni, neighbors, community groups and political leaders. A key element of this approach was to provide forums for discussion of master plan issues prior to the development of specific proposals and recommendations. This allowed the College and the design team to consider a variety of points of view, understand special needs and attempt to reconcile distinct interests.

The process was organized in a series of phases:

- Phase I: Analysis, Assessment & Programming (February)
- Phase II: First Round of Input (March)
- Phase III: Study of Options & Alternatives (April/May)
- Phase IV: Summer Quiet Phase (June to August)
- Phase V: Development of the Draft Plan Document (September/October)
- Phase VI: Presentation of the Final Plan Document (November/December)

Based upon design analysis, meeting comments, and other information, a series of master plan recommendations will be provided to the president, who will make a final recommendation to the Board of Trustees. The Board of Trustees will make final the decision on the adoption of the master plan proposal to be presented to the City of Los Angeles in 2006.

This document is intended as an internal college study, is not a final plan and is subject to change without notice at the discretion of Occidental College.



Occidental College & Eagle Rock, 1914



Academic Quad - Swan Hall & Johnson Student Center



Fowler Hall



Johnson Hall



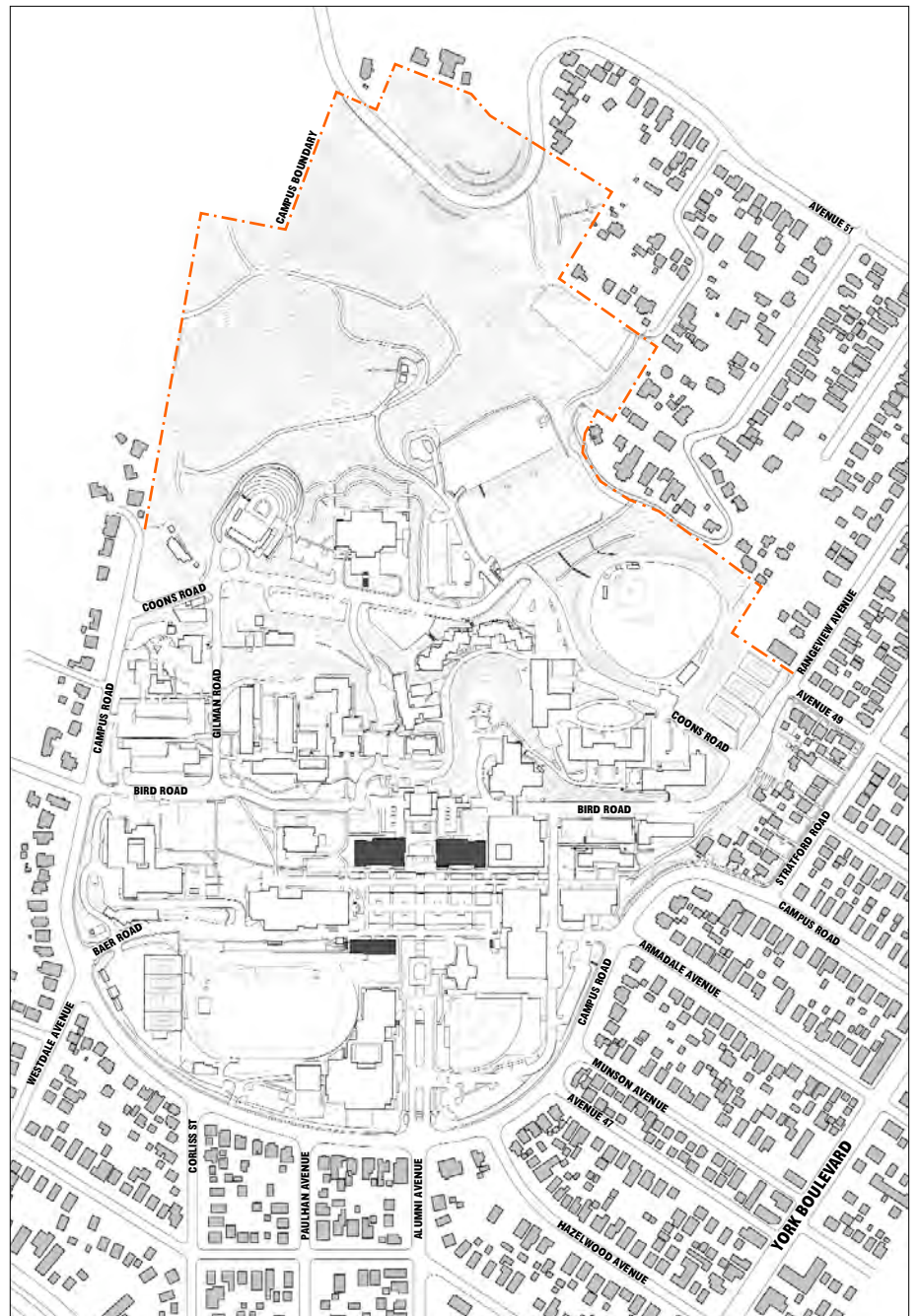
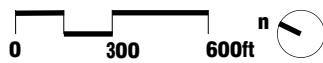
Thorne Hall



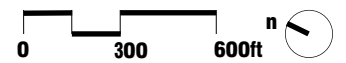
Academic Quad



Myron Hunt Master Plan of 1935



Campus Construction: 1910 - 1920



Myron Hunt and the evolution of the plan - One of the best ways to understand the history of the Occidental College campus is through the work of Myron Hunt, its founding architect. An enduring image of the campus is this Hunt master plan sketch of 1935, produced toward the end of Hunt's long engagement with the College. His design efforts began as early as 1910, when drawings by the firm of Hunt and Grey were first published. These first steps evolved to become a substantial chapter in Hunt's career, as he continued to work at Occidental until his retirement in 1940. He designed all campus buildings during the first 30 years of the Eagle Rock campus. While some of the buildings shown on the 1935 plan never made it off the drawing board (principally those shown for the upper campus), the plan represents the most complete and essential view of the campus ever drawn.

It is clear that Hunt found inspiration in an important national collegiate model, the design of Thomas Jefferson's University of Virginia. For Hunt, Jefferson's work represented a paradigm of planning and design that created a close-knit academic community. Jefferson's emphasis on a central lawn, the serial array of the pavilions, and the strong axial position of the library provided the clarity and formality which distinguished the academic institution as a place. The campus was small enough to encourage strolling and informal contact, yet large enough to accommodate the scheduled interaction of a community of scholars.

Hunt's extraordinary body of completed work at Occidental College -- a total of 21 buildings and other facilities, including all the major buildings on the main quadrangle -- 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.

First steps: 1910-1920 - The College's first buildings were set in the expansive and largely rural setting of early Eagle Rock. Johnson, Fowler, and Swan halls were located on a comfortable plateau situated well below what was then known as Campus Hill, the summit overlooking the campus. The layout of the first buildings was critical to establishing the common open space which would become the main quadrangle, and described the massing and details that would constitute the College's early architectural vocabulary.

The space defined by the quadrangle created an instant sense of place, while taking advantage of a low but expansive vista to the southwest, making the quadrangle the College's memorable center. In comparison to Occidental's mature, fully landscaped campus, these first steps must have seemed to be small ones. Yet the bold placement of those few buildings established a remarkably clear diagram for the development of the core of the campus. It also reflected Hunt's respect for the Jeffersonian approach married with Beaux-Arts planning principles: strong axiality, a commitment to well defined open space, and consistency of architectural form. These first steps established a campus form which would mature slowly over time.

CHAPTER 2 : MASTER PLAN PRINCIPLES

This chapter identifies College-wide policies that constitute the framework for the Plan. Subjects such as the approach to the design and arrangement of on-campus parking, on-campus housing, historic preservation, and off-campus development are addressed here.

The policies reflect both master plan analysis completed in the early stages of the process as well as extensive campus and public comments. These policies form the strategic vision for the Plan's 20-year life. These strategies are noted as follows:



- 1: Affirm a historic preservation-based plan as a key, long-term approach.**
This policy reinforces the intent and importance of Myron Hunt's original master plan as a framework for ongoing development and future campus planning. This includes both a preference for Hunt's architectural vocabulary and his approach to campus planning.
- 2: The College will initiate projects as necessary to accommodate institutional programmatic needs and to enhance interaction between students, faculty, staff, administration and community.**
This policy reflects the College's need to generate a variety of project types to respond to new program needs as they occur over time. These could include the restoration and rehabilitation of existing buildings, the design of new buildings, open space, landscape, sustainability, transportation and/or utility projects, as necessary.
- 3: Institute a long-term site, building sustainability and management of hydrology program.**
The notion of "greening" the campus includes both the enhancement of existing landscape as well as implementation of prudent conservation measures through facility design. This policy acknowledges the importance of environmental design in principle while recognizing the practical matter of engaging in such design on an ias possiblei basis.
- 4: Utilize appropriate infill sites to accommodate needs over the long term.**
As needs arise for the design and construction of new buildings or other program spaces, this policy emphasizes the use of sites located within the existing urbanized campus. These sites are typically constrained by existing conditions. Therefore, all future projects should address in their form the repair and completion of the area of the campus they are located within.
- 5: Reconfigure campus parking and roads in the central campus to create a more pedestrian-friendly environment and respect the needs of the disabled.**
This policy promotes the enhancement of a pedestrian-friendly environment for both the disabled and non-disabled by new or strengthened pedestrian connections between the upper and lower campus and by the limiting of vehicular traffic and parking in its most central and prominent portions. In some cases this will result in the transformation of roads and parking lots into service lanes.
- 6: Renew the campus landscape to create more outdoor spaces, courtyards, promenades and to enhance interaction opportunities; integrate native, non-invasive plant species.**
This principle seeks to enhance campus interaction opportunities by the redesign of under-utilized exterior spaces and promotion of outdoor "rooms, courtyards, and promenades. The campus can be transformed by attending to the maintenance and redesign of its landscape at a cost that is a small fraction of the budgets typical of new building facilities.
- 7: Implement "low traffic" parking and transportation measures and encourage use of multimodal transportation alternatives.**
This policy provides for transportation management which reduces the impact and quantity of parking and traffic over time. This includes measures such as subsidized transit passes, car sharing programs, bicycle amenities, and commuting and parking reduction strategies. All of these will be exercised through careful monitoring of the campusi transportation performance over time.
- 8: Incorporate strategies to incrementally correct a wide variety of small, non-functional plan components.**
This policy addresses the modification of small incrementally added building and landscape components which are ineffective and/or unsightly. Many of these were introduced into the campus without an overall plan over the last 50 years. They typically affect the public space of the campus and include a broad range of items such as unscreened or improperly located transformers to poorly located exterior walks, ramps and stairways.
- 9: Remodel, reconfigure, remove or replace dysfunctional buildings or buildings with limited horizons which do not support the character, scale, quality, function, or safety of the campus.**
This policy provides the freedom to edit and remove buildings on campus which are badly located, ill formed, or are functionally and physically outmoded.
- 10: Encourage regular communication and interaction with the surrounding community; encourage and cooperate with neighborhood-compatible development approaches.**
This policy seeks means to better physically integrate the College with the surrounding community and enhance contact with neighbors on issues of mutual interest.
- 11: The Board of Trustees will approve and implement the principles of the master plan through specific projects and will monitor and periodically evaluate the master plan's principles, goals and results, under advisement as appropriate. The Buildings & Grounds Committee will serve as ongoing conduit to the Board for master plan issues and make recommendations when Board approval is required.**
The Board of Trustees will serve as the principal means for the College's approval, implementation and stewardship of the master plan.

CHAPTER 3 : THE PLAN

FIVE BIG IDEAS

The master plan vision describes an approach to the long-term physical configuration of the Occidental College campus. This vision will be carried out through many kinds of projects; each project contributing to the incremental completion of the vision, addressing architecture, landscape, traffic and parking, sustainability, historic preservation, and neighborhood compatibility.

This section of the master plan describes the five big ideas that will prioritize the execution and guide the design of each project, big or small, through 2025:

I. Restore and adaptively reuse existing buildings

The College's historic buildings are irreplaceable and their restoration and reuse should be the first option to meeting future program needs. This effort acknowledges Myron Hunt's remarkable vocabulary of architecture and gardens, both of which are inseparable from the identity of the College. These historic buildings and places on the Occidental campus provide both the essential image and the key places on campus that the academic community associates with the process of learning. All design work on historic resources should be executed under the Secretary of the Interior's Standards for Rehabilitation.

II. Build new projects that contribute to a coherent campus form

A college is an operating entity that requires the freedom to sensitively add new buildings and other facilities to its campus as necessary to carry out its academic mission. A principal strategy of this master plan is the design of such new buildings, principally on infill sites. Densification of the existing campus offers the social benefit of concentrating the relatively small campus population in the existing heart of the College, and reinforcing the interactive nature of campus life. This kind of reinvestment confirms the core of the campus as the College's permanent historic center.

III. Pedestrianize the academic campus

Over the next 20 years through 2025, the center of the Occidental campus should be pedestrianized. This can be accomplished by two principal means: incrementally converting selected roads, parking lots and other hardscape areas into service roads and pedestrian use; and adding and/or improving existing left-over space into gardens, gathering places, pedestrian paths, and other means of facilitating social interaction. This should also provide care in providing access for the disabled.

IV. Create green buildings and green landscapes

Every opportunity should be taken advantage of in integrating sustainability measures into the renovation and construction of new campus buildings, landscapes and utility systems. Linking environmental stewardship with every new project on campus will offer tangible middle- and long-term savings. It will also provide a model of environmentally responsible management that recognizes Occidental as a leader in this area among its peer academic institutions.

V. Encourage and/or participate in neighborhood-compatible development

An active town-gown engagement benefits the College's academic programs and purposes. General initiatives will center on two areas: Advocacy for development of projects which can improve life both in the neighborhoods and the campus; and the maintenance of channels of communication regarding campus-initiated projects. Specific projects of mutual interest include ongoing use of campus-owned neighborhood houses, potential mixed-use projects in commercial areas, a variety of neighborhood improvements, and new faculty and staff housing opportunities on the edge of campus.

PROGRAM ELEMENTS

The program reflects a variety of types of academic needs, expressed in terms of projects. These include the renovation of existing facilities, the construction of new facilities, and infrastructure improvements Of all kinds.

The program elements are described in detail within the Appendix section on Projects. The projects below are not listed in terms of importance; they are listed solely to make their identification on the accompanying campus map easy.

Master Plan Entitlements	Renovation	New
1 : Swan Hall -- expand and renovate	0	0
2 : College Commons	0	
3 : Gardens for group Interaction	0	0
4 : Child Care Center	0	0
5 : Renovated recreation & athletic facilities		0
-Alumni Avenue colonnades/athletic facades	0	
-Replacement tennis courts		0
-de Mandel Pool		0
-Fitness Center and offices	0	
-Renovate playing field for multisport use & provide new changing rooms	0	0
6 : Alumni Center		0
7 : Residence Hall enhancement	0	
8 : Incremental traffic/landscape/ pedestrian improvements	0	
9 : Employee housing		0
10 : Library major renovation	0	
11 : Booth Hall renovation	0	
12 : Multipurpose Facility		0
13 : Performing arts/dance facilities		0
14 : Remsen Bird Hillside Theater renovation		0
15 : Samuelson Pavilion Annex		0
16 : Chilcott Annex & replacement	0	0
17 : Sycamore Glen renovation	0	
18 : Outdoor Chapel		0
19 : Fiji Hill Summit pavilion		0
20 : New academic building		0
21 : Major repair & renewal	0	
22 : Weingart Center	0	
23 : Women's Center relocation (location tbd)	0	

CHAPTER 3 : THE PLAN

FOCUS ON SPECIFIC AREAS

The Plan Vision directed attention to the five big ideas which can bring about the most extensive and positive physical change on the campus in the shortest period of time.

This chapter, Plan Focus, describes design improvements in the form of discreet, yet coordinated clusters of projects. These are concentrated in particular areas of the campus to facilitate better environmental performance and more enabling and beautiful campus surroundings. The future overall improvement in the appearance and livability of the campus depends on the successful execution of these multi-faceted projects.

A. Alumni Avenue streetscape - This particular place needs to be rebuilt as a matter of priority, because it functions as the formal entrance of campus, the place where Occidental intersects with the wider community, and where a visitor gets his or her first impression of the College.

This is an area of vital importance for the image and function of the College. The improvements planned will create temporary parking along Alumni Avenue, contributing to convenient drop-off, and short-term parking for faculty, students and visitors. This historic axial approach to the campus will be improved, creating a more welcoming public face for the College. Four enhancements are proposed:

- ī Replace open parking on Alumni Avenue with 15 minute loading parking
- ī Create formal arcades on both sides of Alumni Avenue (from Campus Road to the fountain) which are directly linked to existing entry paths
- ī Enhance the streetscape to frame the entry and median
- ī Provide a gate house for the Alumni Avenue entry

B. Athletic Improvements - The College's athletic facilities are a heavily used for intercollegiate sports, club and intramural sports, and recreation by students and community members. These improvements address the need for updated and new facilities, and the correction of existing functional deficits. A variety of improvements are proposed:

- ī Replace the Alumni Avenue facades of Rush Gymnasium, Taylor Pool and Alumni Gymnasium with a coherent design in keeping with the best of the College's traditional architecture
- ī Provide landscaped terraces and pedestrian amenities in the spaces created between the new Alumni Avenue arcade and the new facades
- ī Convert Taylor Pool to a fitness center
- ī Renovate the athletic offices
- ī Build the new de Mandel Pool
- ī Build two new tennis courts as an addition to the existing Facilities building
- ī Renovate the existing sports field and convert to multisport use; provide changing rooms

C. Student Center area - The most consistently popular public gathering area on campus is the walk between Johnson Student Center and Samuelson Pavilion. The enhancements suggested for this area will both renew a long-time favorite student assembly area and add program space. Other adjacent areas of student gathering also will be addressed by the following proposals:

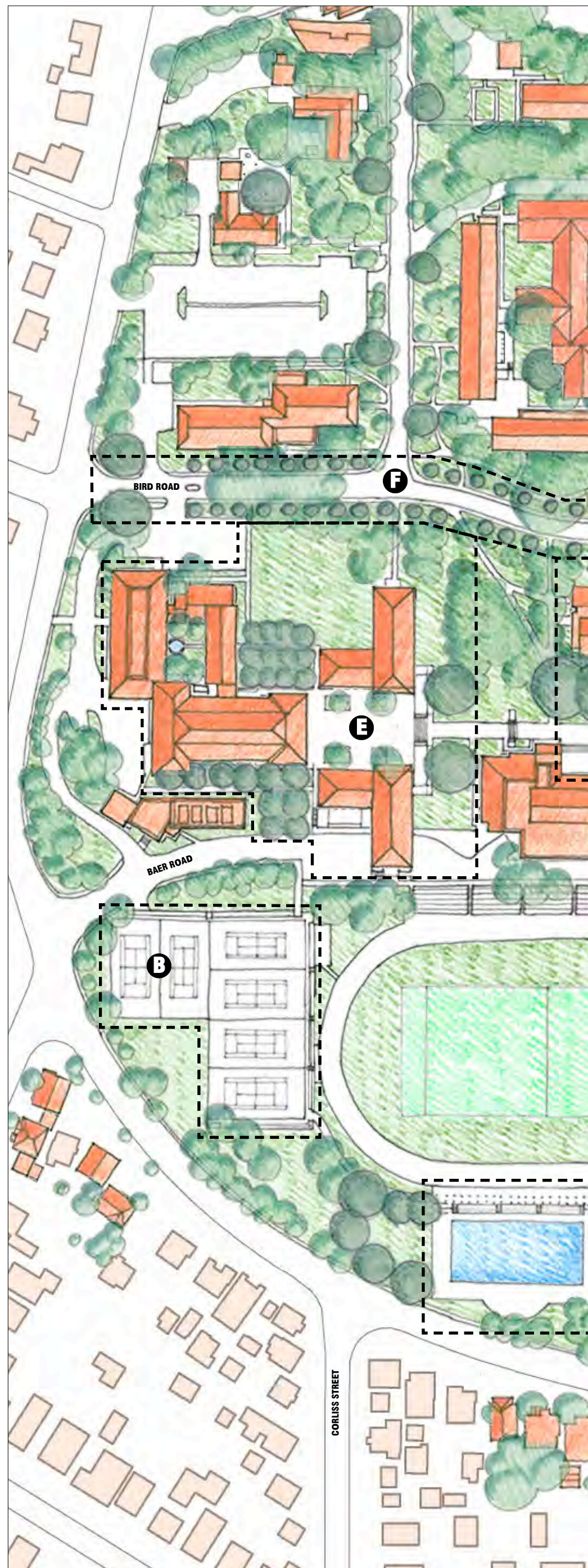
- ī Build an annex to Samuelson Pavilion to create a coffeehouse destination for student activities
- ī Create an outdoor patio for Samuelson Pavilion for gatherings
- ī Provide a new garden and pedestrian amenities in the gathering area between Samuelson Pavilion and the Johnson Student Center
- ī Remove (or screen and provide sound attenuation for) the visible transformers at Johnson Student Center and Coons Administration building lower level "flanking" courtyards
- ī Provide new landscape at the two lower level "flanking" courtyards at Coons Administration Building

D. Main Quad - Swan Hall is both an important part of the College's heritage and a building highly visible upon entering the campus. The renovation of this facility and the addition of new program space will provide much needed faculty office and academic instruction space. This project will also reinforce the character of the College's main access point.

The library building is symbolically and functionally the most important single building on campus. Through repeated renovations its architectural presence has been diminished. Through forthcoming and ongoing renovations, the campus prominence of this building needs to be restored.

The following improvements are proposed:

- ī Design a sensitive renovation of Swan Hall and add a substantial new academic wing to the building
- ī Add gardens, private and public, that are sympathetic to anticipated improvements along Alumni Avenue
- ī Renovate the ground floor of the library and reopen both of its ground floors to the Main Quad



DESIGN CONTROLS

III Architectural Frontages

Every campus building is a simple box containing a set of rooms designed to accommodate a range of academic activities. Yet every campus building has the responsibility of defining and enriching the public space of the campus. Definition is the simple result of appropriate building alignment as described previously. Each campus building enters into dialogue with its neighbors through its location and volumetric configuration to define the figures of open space that make up the campus.

Enrichment is accomplished when the form of buildings provides places for people to be outdoors, taking advantage of the opportunity for spontaneous or organized gatherings. These places are generated by architectural elements contained or attached to each building, such as arcades, porches, loggias, elaborate public stairs, etc. The interface between the normative portions of a building and the public space they define and enrich is its architectural frontage.

Whether one or more primary frontages are identified, all new buildings planned for the main quadrangle or adjacent to principal public places should be oriented in sympathy with this method of architectural design that is native to the Occidental campus. To properly address these issues, the character and choice of orientation for the building facades must be carefully considered.



Porch: Thorne Hall

IV Compositional and Material Palettes

An important aspect of lower campus buildings is that the vast majority of them are historic and monumental. Their 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. Its value is that it is compositionally free and unique to the Occidental campus.

This is the formal signature of the College, its image generated at its foundation. This is a priceless endowment, particularly when one compares Occidental to the colleges founded in Southern California after 1940, most which remain architecturally faceless. Therefore, this traditional architectural language must be continued in future buildings.

The design of individual buildings depends on a vocabulary of shared elements held together by a particular compositional syntax. The following is an outline of issues to be accounted for by the architects of future campus buildings while this plan is in force:

1 Elements

- ī Are walls divided into three elements, base, body and cornice?
- ī Are bases elevated, bodies generated out of opaque, heavy materials and do cornices project to support tile roofs?
- ī Are windows cut out of walls, deep set and of vertical proportions?
- ī Are doors and windows designed in pattern, profile and detail particular to each new building? Are they of the scale of the whole building?
- ī Are entranceways emphasized to be of the scale of the whole building?
- ī Is all recessed or protruding ornament built of permanent materials?
- ī Is the color of the building appropriate to the stated standards published by the Architectural Review Subcommittee of the Building and Grounds Committee?

2 Syntax

- ī Is the building both a harmonious, identifiable object and a part of the fabric of a timeless campus architecture?
- ī Does the building express in its elevation a compositional pattern that that is appropriate to its type, program and site?
- ī Does the building express in its elevation a tectonic pattern that that is appropriate to its type, program and site?



Wall at Corner Articulation - Johnson Hall

CHAPTER 4 : PLAN COMPONENTS

INTRODUCTION

The master plan has been described in previous chapters as a holistic undertaking, engaging in its implementation a variety of technical disciplines simultaneously. In this chapter, it will be presented as a series of strategies phrased in the particular terms of each individual discipline. Overall coordination and internal consistency of the actions within each discipline are necessary to a coherent and effective campus development process.

Historic Preservation, Architecture, Landscape, Transportation, Sustainability, Civil & Utility Infrastructure, and Neighborhood Compatibility are each framed as a series of internal tasks and strategies that are either incorporated into projects as ingredients or become projects in themselves. For example, a landscape strategy could become part of a building-centered project, or be implemented as a single landscape-driven project. The following is an introduction into the strategies and projects for the seven key plan topics.

Historic Preservation - The reuse of campus buildings is part of an essential ongoing process of maintenance and renewal. It capitalizes on investments already made as it takes advantage of attending to the places on campus most admired and beloved by students, faculty, staff and alumni.

This section outlines the particular preservation policies and project requirements to be established on the Occidental campus. It presents a list of preservation projects to be considered in the course of this plan. It also directs attention to the federally mandated standards for historic building rehabilitation, and argues for a link between the process of resource preservation on campus and the educational mission of the College.

Architecture - A master plan is to a great extent driven by its architectural components. The construction and maintenance of facilities of all kinds is the development engine of a campus. The recent history of this kind of building at Occidental has resulted in isolated and self-referential projects.

This section identifies new and renovation projects and establishes the standards for their completion. It does so by introducing a protocol for project initiation that is inclusive of all disciplines necessary to raise architecture to the challenge of building a coherent and harmonious campus, one project at a time.

Landscape - The Occidental campus is a precious natural resource. The plan embraces a wide variety of projects which will enhance the landscape and pedestrian character and experience of the campus.

On the landscape side, strategies and projects aim to preserve historic fabric and to enhance the space between buildings as an active social ingredient in the academic mission of the College. On the circulation side, strategies and projects aim to expand the pedestrian network to the entire campus by promoting a car-free central campus and maximum connectivity between campus zones, independent of topographic barriers for both disabled and non-disabled.

Transportation - The management of transportation issues includes the need to implement design and policy changes to appropriately serve faculty, students, staff and visitors while enhancing the physical environment. This section describes an effort to balance automobile usage and pedestrian activity as part of a campus enhancement approach.

The principal design change will be the establishment of a car-free zone in the heart of campus and its incremental expansion through the monitoring of the demand for parking over time. The principal policy direction is the introduction of various low-demand initiatives that encourage the users of the campus to reduce their reliance on automobiles.

Sustainability - The nature of the College as a long-term institution creates the opportunity to integrate efficiency into the operation of the campus and its buildings. This section outlines means of achieving both financial and resource benefits of campus-wide sustainability approaches.

It also outlines a comprehensive list of sustainability measures to be considered by designers of future College projects and proposes four simple implementation steps that can improve the sustainability performance of the campus.

Civil and Utility Infrastructure - Most of the civil and utility infrastructure was constructed as part of individual building projects beginning almost a hundred years ago.

An analysis of existing conditions exposed significant challenges in keeping the various engineering systems of the campus in operation. Consultation with the Office of Facilities Management led to the outline of a scope of work for improving the utility infrastructure over the next years, both on a project-to-project basis and as part of coordinated utility projects.



Historic Preservation

Neighborhood Compatibility - The College exists in the context of a set of traditional neighborhoods and commercial corridors. Over time a symbiotic relationship has evolved that improves the quality of life for both town and gown.

The interests of the College and its neighbors also overlap when it comes to future development. This section outlines policies of both exclusive and mutual interest to the two parties and suggests that an on-going process of communication and interaction will maximize long-term benefits to all.

HISTORIC PRESERVATION

Background - Campus history begins with the significant role of Myron Hunt as the master planner for the original College site plan and architect for numerous buildings until 1940. It also includes Beatrix Farrand's role as landscape architect for a series of key spaces, including the main quadrangle. These influences formed the campus principal design direction and environment, and make the campus an important historical artifact. This was recognized in the recent identification of the campus as a historical district. All of these factors contribute to the need for the integration of historic preservation/rehabilitation practices into this master plan. These practices will primarily affect the treatment of contributing buildings and landscape which are now identified through the historic district designation. However, they also need to inform the placement and compatibility of new buildings.

Historic preservation policies - The preservation plan includes both policy provisions, which articulate the intent of the program, and actual implementation requirements. Both need to be carried out for the plan to function properly. The policy provisions should guide long-term management of the College's preservation efforts. These include the following:

- Consider existing historic resources as assets and fully incorporate them into future campus planning
- Reinvigorate the Myron Hunt plan using historic preservation guidelines and principles
- Use the Secretary of the Interior's Standards for Historic Preservation as guidelines for the rehabilitation of the historic campus
- Research campus heritage efforts at other colleges and universities around the country
- Use the master plan as a vehicle for education

Implementation requirements - To advance the above process, and to insure that historic preservation is implemented as a long-term approach, the following measures need to be well integrated within the design and execution process for all landscape and architecture projects:

- Complete a historic survey of existing building or landscape to identify significance prior to commencing design
- Determine the character-defining features and catalog any existing historic fabric, and use as a reference when proposing alterations
- Implement strategies in design and construction effort to avoid the removal of historic fabric or alteration of character-defining elements
- Use the Secretary of the Interior's Standards as guidelines for the rehabilitation of the historic campus

Project types - To provide specific guidance on a project by project basis, anticipated historic landscape and architecture projects are categorized by four types noted below.

Landscape projects (renovation/rehabilitation) with historic implications - Two historic landscapes have been identified as having historic implications. The master plan recommends preservation and establishment of management programs for the following projects:

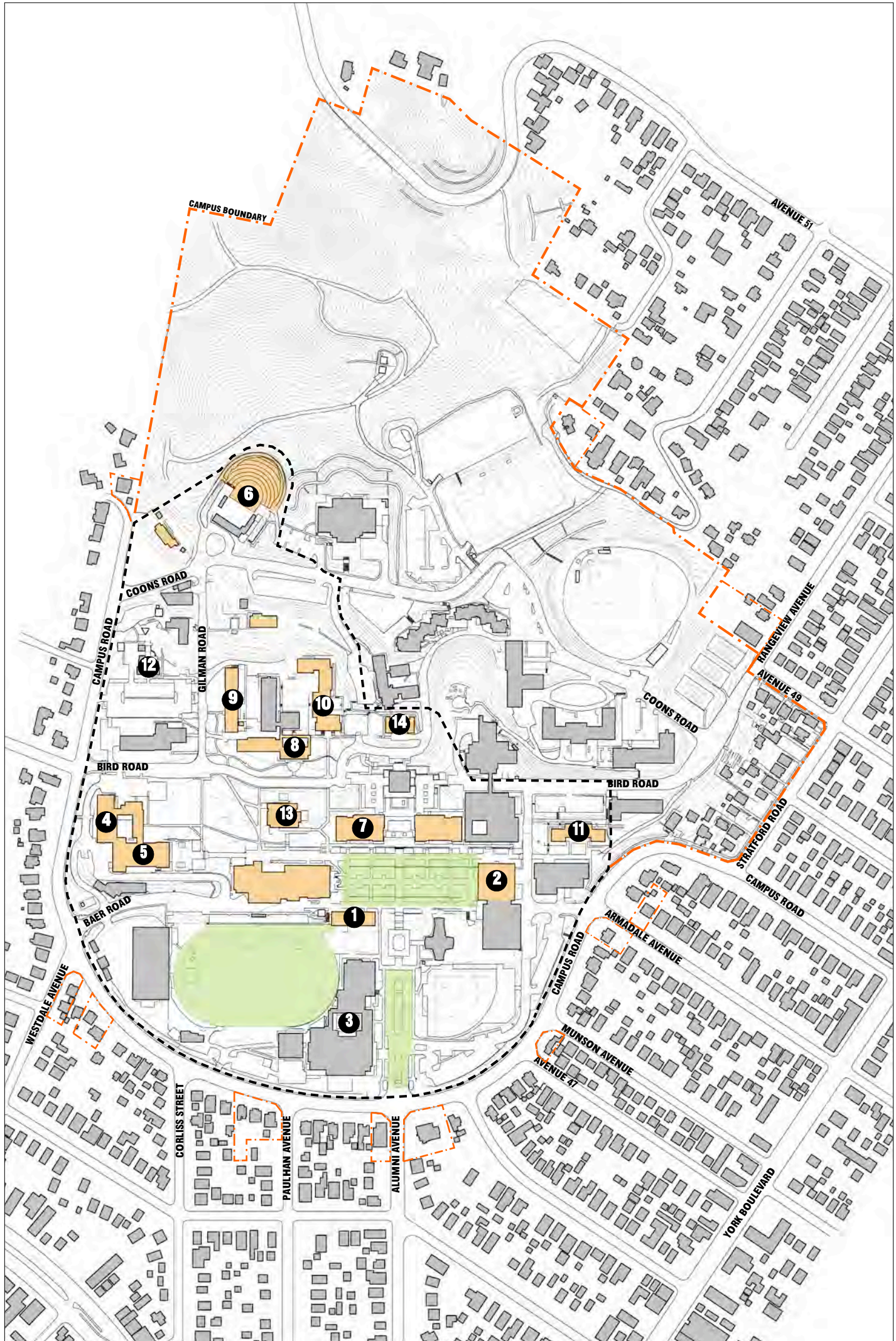
- Alumni Avenue streetscape and landscape
- Thorne courtyard plantings

Landscape projects (new) with historic implications - An important and related activity will be to respect the axes and spatial relationships of historic buildings when developing new landscapes. Designs for new landscapes should seek to incorporate design features and plant palettes reflective of Beatrix Farrand's historic approach.

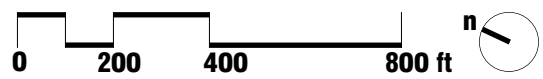
Architecture Projects (renovation/rehabilitation) with historic implications - A variety of existing buildings have been identified as having historic implications, should they be considered for future modifications.

Architecture projects of all types (new construction) - New construction projects and their phasing are identified in the *Architecture* section of this document. Should such buildings be located within the Occidental Historic District, the project approach should be informed by strategies outlined in the Secretary of the Interior's Standards.

Historic preservation projects - The attached drawing locates potential historic projects which may be pursued in the next 20 years through 2025



Campus Plan - Historic District



**HISTORIC PRESERVATION PROJECTS -
(Potential Projects)**

1. Swan Hall - Renovation/Rehabilitation & addition
2. Mary Clapp Library - Historic Survey/Programming/Reopening of historic entrances
3. Alumni Gym and Taylor Pool - Survey/Removing incompatible additions(Fitness Center)
4. Booth Music Center - Survey/Refurbishment/Renovation
5. Thorne Hall - Survey/Refurbishing interior; Restoration of forecourt landscape
6. Remsen Bird Hillside Theater - Survey/Renovation
7. Johnson Hall - Survey/Renovation
8. Weingart Center - Survey/Renovation
9. Erdmann Hall - Survey/Renovation
10. Haines Hall - Survey/Renovation
11. Wylie Hall - Survey/Renovation
12. Collins House - Survey/Renovation
13. Samuelson Pavilion - Survey/Renovation
14. Emmons Health Center - Survey/Renovation
15. Campus-wide - Survey historic views

- District Boundary ---
 - Contributing Buildings
 - Contributing Landscapes
- Perimeter landscape, Pardee and Thompson Gates and circulation paths not shown.

CHAPTER 4 : PLAN COMPONENTS

ARCHITECTURE

Background - The campus framework set out by Myron Hunt's master plan and buildings has sustained Occidental College for nearly a century. The effectiveness and relevance of Hunt's foundation ideas to 1940 will be central to all future architectural design on campus initiated under this plan.

Architectural Approach - Architecture is the central ingredient of a campus plan, and this plan is no exception. The magnitude, location, capital expense and entitlements of building facilities drive the campus planning process. Chapter 3 described the principal ingredients of the Plan as Five Big Ideas, Design Controls, Focus on Specific Areas, and Regulatory Standards. For all practical purposes, these are also the key architectural strategies that the College will pursue over the next 20 years.

1 Five Big Ideas - This strategy suggests that there are five priority issues that will drive architectural projects at Occidental: the preservation of its historic buildings and places, the design of new facilities that are compatible with the form of the existing campus, the pedestrianizing of the academic campus, the greening of the campus by introducing both site and building sustainability measures, and the pursuit of neighborhood compatible development.

2 Design Controls - These are the architectural code items that will steer the architects of future buildings on campus to work constructively at Occidental, ensuring that new buildings will be sympathetic to the existing campus and incrementally contribute to the coherence of the campus as a whole.

Plan Alignments, Axial Terminations, Architectural Frontages, Compositional & Material Patterns and Massing Configurations are devices abstracted out of the Hunt plan. If used imaginatively, they can generate campus buildings as good as those built at Occidental before 1940.

3 Focus on Specific Area - This strategy aims to take advantage of future investments of time and money to put into place the most concentrated, visible physical change to the campus. It directs development to particular places on campus, to finish incomplete precincts, to repair malformed ones and to begin new ones.

4 Regulatory Standards - At the completion of the master plan process, an agreement will be reached with the City of Los Angeles through the public process to implement its provisions. This strategy outlines the regulations that will control development on campus: the setbacks, heights, footprints, volume of building and parking to which each building project will have to conform.

Establishment of a project initiation protocol - To take advantage of the campus building opportunities inherent in every project small or large, there will be a standard format for initiating all projects on campus.

Projects are intended to accomplish the following goals:

- 1: Incorporate needed program spaces
- 2: Identify and achieve program goals
- 3: Respect the historic status of any contributing historic building and landscapes
- 4: Integrate related master plan projects connected to the project site and immediate surroundings

The project protocol should be applied to professional disciplines (or neighborhood interests) as noted in the following section.

Historic Preservation - (Applies to buildings which are identified as contributing historic structures on Historic District map):

- Before any construction takes place, conduct a detailed survey of the original building's interior and exterior to determine the character-defining features and catalog any existing historic fabric
- Removal of character-defining features and historic fabric should be avoided
- Utilize Secretary of Interior Standards for treatment of both existing structure rehabilitation efforts and design of new additions
- Provide design of an addition which is compatible in terms of massing, scale and placement while remaining differentiated
- Consider connection points and reversibility for any addition where new construction is proposed to directly adjoin the historic structure
- Avoid damaging points of connection to the historic building or covering character-defining features

Architecture -

- Complete a needs survey and program confirmation with users and administration
- Clarify and organize internal circulation of existing building with addition
- Organize footprint according to master plan diagram
- Survey ADA status of the existing building; confirm that existing/planned facilities will conform to requirements

Landscape -

- Provide outdoor areas for interaction and discussion
- Confirm integration of master plan landscape improvements and paths systems with new design
- Where landscape or hardscape modifications are contemplated, incorporate measures for maximum permeability/infiltration
- Integrate a native plants program and use of non-invasive plant species

Transportation -

- Provide bicycle racks well integrated into design
- Confirm existing parking quantity will support intended use
- Remove existing parking and roads per incremental traffic/landscape/pedestrian improvements plans; integrate appropriate landscape improvements

Sustainability -

- Establish sustainability goals for the project, using the *Scope of Sustainable Design and Project Performance* guidelines in the sustainability section of the plan
- Review and incorporate sustainable work by other disciplines which can be accomplished as part of the project. Engage other disciplines early in the process

Civil and Utility Infrastructure -

- Undertake pending subsurface utility upgrades which may be appropriate to coincide with project
- Upgrade pending electrical upgrades which may be appropriate to coincide with project

Neighborhood Compatibility - (Two types of projects are relevant to this work):

- 1 Projects located beyond the perimeter of the campus
 - Maintain an ongoing discussion of projects with the potential for mutual benefit by campus and neighborhood. The intention should be to encourage beneficial development whether or not it is owned and operated by the College.
- 2 Projects owned by the College either at the perimeter of campus or immediately adjacent
 - Establish neighborhood compatibility as a design team objective
 - Initiate discussions with affected neighborhoods
 - Provide ongoing information sources to update the community on the College's master plan progress

New Architecture Projects - The attached drawing describes and locates all entitled architectural projects that may be constructed in the next 20 years through 2025.

CHAPTER 5 : IMPLEMENTATION

The process of implementation will be critical to the implementation of the goals of this master plan.

Background - Traditionally, there are three groups who are closely involved with the initiation of physical improvement projects on a campus: boards of trustees, senior administrators led by presidents, and various constituencies both internal (including members of the faculty, staff, students and alumni) and external to the campus community with deep interests in the life and form of the campus and its buildings. Each of these parties brings independent knowledge and resources which can be applied to the execution of a project. Since these parties offer different perspectives, it is important that the approval and execution of new projects be both rigorous and inclusive.

This implementation plan sets out a specific method for the review of projects outlined within this master plan. The seven steps described below are intended to provide a framework for successful project implementation over time.

1: Confirmation of board review processes - The Board of Trustees has the exclusive authority to approve projects on the Occidental campus. The board's formal process for project approval states that the President is responsible for presenting major construction proposals to the board after weighing the project's congruence with the College's mission and with the master plan. The board delegates substantive deliberation of specific projects to its Buildings and Grounds Committee. The board has determined that the Buildings and Grounds Committee is responsible to monitor and assess the implementation of the master plan. The board should review and discuss at least annually a progress report on master plan implementation provided by the Buildings and Grounds Committee.

2: Creation of a structured project approval review - The board should continue the Buildings and Grounds Committee's current practice of reviewing projects estimated to cost more than \$250,000 and of requiring board authorization for new and renovation projects meeting or exceeding this threshold. Additionally, the board should continue the Buildings and Grounds Committee's current practice of having any project with an exterior campus impact reviewed for design integrity and conformance with the master plan by its Architectural Review Committee.

3: Designation of a master plan monitor - This master plan will take 20 years to complete. To fulfill its long-term promise, a program of routine operational implementation is essential. The Director of Facilities Management or another appropriate senior staff member as designated by the Vice President for Administration and Finance should be responsible for communicating routine operating and implementation issues to appropriate staff, and to insure that even minor projects undertaken in the daily course of institutional affairs comply with the master plan.

4: Creation of a project-based approach - The broad scope of the master plan requires that it address the entire campus. However, projects are typically undertaken within individual, limited geographic areas, and require localized efforts. For this reason, all projects should include an assessment of ways in which other master plan goals which can be incorporated in the same locale. For instance, a new building will likely require new landscape, which could facilitate both the creation of new student gathering areas, replacement of existing/outdated utilities, and use of sustainable landscape technology. The master plan monitor should serve as a guide in this process.

5: Facilitation of interdisciplinary coordination - As in the case of the "project-based approach guidelines," the Vice President for Administration and Finance should ensure that both the internal facilities staff and appointed design and technical consultants to a specific project know all relevant master plan principles and requirements that apply to that project, and facilitate the Buildings and Grounds Committee's careful and complete review of the conformance of a project's design with the master plan.

6: Creation of a sustainability knowledge base - The vitality of the campus sustainability program depends on the knowledge base of those who design and construct projects. A key component of that base is staff expertise. Both the administration and facilities management staff should receive training in sustainable design practices to properly implement the sustainable goals of the master plan. The recommendation for annual training of at least two administrative and two facilities staff is a critical part of the implementation activity

November 20, 2010

Via Email & Mail

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

RECEIVED
CITY OF LOS ANGELES

NOV 23 2010

ENVIRONMENTAL
UNIT

Re: Written Response to Draft Environmental Impact Report (DEIR) for Proposed Project Swan Hall renovation and addition, Occidental College, 1600 Campus Road, Los Angeles CA 90041- ENV- 2010-653-EIR, State Clearinghouse No. 2010041044

Dear Ms. Kitching,

Thanks you for the opportunity to review the Draft Environmental Impact Report (DEIR), dated October, 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. As stated in the DEIR, Swan Hall, constructed in 1914, was one of the first four campus buildings designed by architect Myron Hunt for the new location. Its construction, as the first residence hall, served to complete the establishment of a fully-functioning college sited on the Main Quadrangle which functioned as the nucleus of the campus. Therefore, it was greatly concerning to read the final sentence of Chapter 3 of the DEIR that states: "The proposed project would have a significant and unavoidable impact with respect to historic resources (Swan Hall)."

5-1

While this is a sobering conclusion, the DEIR Alternative Analysis in Chapter 4 validates discussions that a number of historic and community groups have had with the College that a preservation alternative is both feasible and cost effective and that opposition to such an approach is based on selected design solutions and not the programmatic requirements of the proposed project. **Replacing the proposed project with one that is consistent with the Secretary of the Interior's Standards for Rehabilitation would be the preferred approach for preserving this and the other historic buildings on campus.**

Since the DEIR does not change the proposed project before the decision makers, the following inconsistencies of the document still need to be addressed.

Inadequate Documentation of the Resource

The DEIR does not adequately document the historical resource. As requested by several respondents to the NOP, the DEIR should consider the fact that Swan Hall may also be individually eligible for listing on the California Register since it appears to meet several of the criteria. Particular those related to it association with the architect Myron Hunt, the building represents his "Californian" style. Swan Hall is an early interpretation of Mediterranean Revival style, and the decision of the trustees to move Occidental College to the then new city of Eagle Rock. Jones and Stokes report states that "Hunt is generally accepted as a master architect and Occidental College is associated with him." In the letter responding to the NOP, the Los Angeles Conservancy calls Hunt "one of Southern California's most notable architects." Therefore, aside

5-2

Frank Parrello comment letter

from Dr. Robert Winter's comment that Hunt was not a great architect, several of his buildings are listed on the National Register in which the designations reference other noted historians' professional analysis and appreciation of his work. Also, as stated in the Jones and Stokes survey, the new Hunt-designed campus was a major factor in the development of the City of Eagle Rock which experienced rapid growth around the time of the construction of the campuses first buildings, including Swan Hall, in 1914.

5-2
cont.

Discretionary Action

The DEIR does not adequately describe the discretionary actions required for the project. LAMC Chapter 1, Section 12.24 F. Conditions of Approval states that "In approving the location of any conditional use, the decision-maker may impose those conditions, based upon written findings, which it deems necessary to protect the best interests of the surrounding property or neighborhood, to ensure that the development is compatible with the surrounding properties or neighborhood, or to lessen or prevent any detrimental effect on the surrounding property or neighborhood or to secure appropriate development in harmony with the objectives of the General Plan." The decision goes on to state that the height and area regulations required by other provisions of this chapter shall not apply to the conditional use approved.

5-3

Therefore, either the project description should be modified to state the number of parking spaces that will be provided for the new 22,700 square foot building or the project description should include a request for a zoning variance under Section 12.27 of the LAMC.

Cumulative Impact

As stated in the DEIR, the loss of this building could set a precedent for how other buildings on campus are 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. The DEIR does not fully address or analyze this.

The college's adopted Master Plan clearly states their intent is to update and adaptively renovate all historic structures in order to meet the needs of the College. Overall impact would be the loss of the historic district as, based on the approach to this proposed project, each contributor would be assumed to be treated in a similar manner.

5-4

The fact that the architect was prolific does not mitigate the loss of significant works by this architect nor should that be a reason to downplay the loss of this or other Hunt-designed buildings on campus.

** Not mentioned in Preservation Consultant's report.*

Inadequate Mitigation

As concluded on page 21 of Appendix C, it should be clearly stated that in accordance with the State Guidelines for the Implementation of CEQA, that the mitigation measures presented in this report may reduce the project impact but not below a level of significance.

The DEIR doesn't clearly convey to the decision makers that in accordance with CEQA this is how the proposed project will mitigate the impacts. Documentation of the historic resource does not reduce the impacts to a level of insignificance. It needs to be clear that by implementing these mitigation measures the project is not reduced to a level of insignificance and that there is still an unavoidable impact.

5-5

Inconsistencies in Alternatives Analysis

The DEIR has inconsistencies and the full cost of the project hasn't been fully vetted by peer review, and doesn't appear to include a Standards-compliant project that would be an Exempt project.

5-6

The credentials of the peer reviewer (O'Halloran) and his neutral outside objectivity would seem to imply that his estimate of \$566,000 is valid and more credible than by the architect who may carry bias towards his original design.

5-7

All the various cost scenarios are essentially irrelevant because the range of the estimates all fall within the standard contingency cost of the overall project -- 15% of \$20,000,000 = \$3,000,000. Therefore the preservation alternatives (or a Standards-compliant project that is Exempt) can be achieved within the amount of the original proposed project's contingency fees. In fact O'Halloran's estimate is 1/6th of the contingency fee budget.

The range of costs between the two estimates have such a great discrepancy (from almost \$2 million to as little as \$566,000) that it lacks meaning. The report passes this off as a difference of opinion between experts; however the internal discussion really points out that the peer review identified errors and omission in the original project estimate and outlined factual differences.

5-8

Additional justification added costs to both projects, such as contingency fees and design fees, which are redundant. Besides the fact that cost is not factor in CEQA analysis, this doesn't really give the decision-maker any valid information to determine whether or how cost is a relevant issue.

Another disturbing revelation on page 4-9, paragraph two, is the admission that the proposed project implied it could reconstruct the original building yet the DEIR document admits to not being able to accomplish this stated objective. "The proposed project would not be able to precisely duplicate the original building and many of its details would be based on modern construction specification that relate to the modern material.... The areas of intended preservation may be less successful."

5-9

Chapter 4.5, pages 4-3 thru 4-5, states in the project description that the entrance on the east side will remain open, unlike the proposed project, to maintain access to the Quad. Then on page 4-5 under the Standards analysis of this alternative, Standard 2 indicates that "central entry on the east façade would be closed and no longer providing access." This is only one of several inconsistencies found in the DEIR that need clarification in order to provide a full and accurate review of the document.

5-10

Additional Alternative

Page 4.7 and 4.8 introduces a different project alternative that is not analyzed. This alternative suggests that the north and south wall of Swan Hall "considerable intervention have occurred in these locations." It implies that "reconstruction with new material and the removal of hollow clay tile may be the appropriate preservation approach there." This is not consistent with the Guidelines for implementation of the Secretary of the Interior Standards (Secretary of Interior Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and reconstructing Historic Buildings by Weeks and Grimmer) which states, "It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature under certain well-defined circumstances, they never

5-11

recommend removal and replacement with new material of a feature that--although damaged or deteriorated--could reasonably be repaired and thus preserved.”

5-11
cont.

Furthermore, this does not adequately addresses similar issues to the proposed project including the inability to reconstruct and retrofit the exterior feature on the north and south facades.

5-12

Material incompatibility is another issue. This hidden or modified alternative suggests the utilization of two different exterior materials – cement plaster and shotcrete. These materials have similar surface qualities but very different properties when responding to exterior conditions. Therefore, the proposed project of re-created demolished exterior features would be incompatible; and of particular concern would be their interface. The DEIR does not fully address this substantially different alternative and its potential impact on the historical resource.

5-13

The alternatives did not discuss or analyze the height of the proposed addition in a manner to create a Standards-compliant project. Occidental should consider a solution that would meet their programmatic requirements and meet the Standards with a three story addition that takes advantage of the change in grade and is the same or less height than the historical resource.

5-14

Missed Significant Impacts

Land use and Planning

In approving any conditional use, the decision-maker must find that “the proposed location will be desirable to the public convenience or welfare, is proper in relation to adjacent uses or the development of the community, will not be materially detrimental to the character of development in the immediate neighborhood, and will be in harmony with the various elements and objectives of the General Plan.” (LAMC) While the project is allowed under a CUP, the DEIR did not address how the project would meet the conditions of approval since it is not allowed by right and is a discretionary action.

5-15

Transportation/Circulation

LAMC 12.21 A 4. “Off-Street Automobile Parking. A garage or an off-street automobile parking area shall be provided in connection with and at the time of the erection of each of the buildings or structures hereinafter specified, or at the time such buildings or structures are altered, enlarged, converted or increased in capacity by the addition of dwelling units, guest rooms, beds for institutions, floor area or seating capacity. The parking space capacity required in said garage or parking area shall be determined by the amount of dwelling units, guest rooms, beds for institutions, floor area or seats so provided, and said garage or parking area shall be maintained thereafter in connection with such buildings or structures.”

5-16

The DEIR appendices of the Initial Study state: “XV. Transportation and Circulation, f) the proposed project will not change the demand for parking and therefore no impact will occur.” This is factually in error since the project contains a 20,000 square foot NEW building and would need to provide parking consistent with LAMC (stated above).

A major concern of the adjoining neighbors has been the spillover of campus parking onto the neighborhood streets surrounding the campus and in close proximity to Swan Hall. Therefore, this adverse impact has not been adequately addressed in the DEIR.

5-17

Hydrology and Water Quality

One method of creating a Standards-compliant project would be to utilize the natural slope of the site where the new addition is proposed to keep three stories that do not exceed the height of the historical resource. College representatives were asked about taking advantage of natural slope of site to reduce the height of the building, and the community was informed that the high water table at this site would prevent this option solution to reduce the height and lessen the impact on the historical resource. The DEIR did not adequately address the impacts to hydrology.

5-18

Over the past year, I have voluntarily worked with the college on the proposed project. As a preservation planning professional with over 30 years of experience, my consistent advice has been to create a Standards-compliant project that the City would consider an Exempt project. I concur with the statement with the conclusion of the DEIR that the proposed project would have an adverse effect on an historical resource.

5-19

The adopted Master Plan of the College says that historic preservation is one of five key principles the College would adhere to. Had the proposed project followed their adopted Mater Plan's requirements to do projects following the Secretary of Interior Standards for Rehabilitation, my original advice to undertake a Standards-compliant project would have saved significant time and money for the college.

5-20

As stated above, it is clear from the DEIR that the impacts associated with the proposed project are the result of the selected design solutions and not the programmatic requirements of the proposed project. The preferred approach would have been for the applicant to have hired design professionals more knowledgeable and sensitive to working with historic al resources. This would have saved both money and time associated with a non Standard's compliant project. However, since an EIR has been pursued, in addition to addressing the issues raised above, I also request that a project design that would fully comply with the Rehabilitation Standards replace the proposed project.

5-21

Sincerely,


Frank F. Parrello,
Principal, Preservation Planning & Development

CITY OF LOS ANGELES
CALIFORNIA

HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL
POST OFFICE BOX 50791
LOS ANGELES, CA 90050
TELEPHONE: (323) 256-8921
[HTTP://WWW.HISTORICHIGHLANDPARK.ORG](http://www.historichighlandpark.org)
Certified as NC #33 MAY 28, 2002

EXECUTIVE BOARD
Chris Smith PRESIDENT
Lisa Brewer FIRST VICE-PRESIDENT
Rick Marquez SECOND VICE PRESIDENT
Mark Reback TREASURER



C/O Department of Neighborhood Empowerment
305 E First Street, Los Angeles, CA 90012
Telephone: (213) 485-1360

ISSUE DIRECTORS
Andrei Anson, ARTS, CULTURE & ARCHITECTURE
Mauro Garcia, TRANSPORTATION & CITY SERVICES
Stanley Moore YOUTH DEVELOPMENT & EDUCATION
David Baird LAND USE
Terry Bonseil OUTREACH
David Kekone PUBLIC HEALTH & SAFETY
DIRECTORS AT LARGE
Miriam Escobar Ofelia Zuniga
Janet Dodson Trish Gosset Steve Crouch

Diane Kitching
Environmental Review Coordinator
City of Los Angeles, Department of City Planning
200 Spring St., Room 750
Los Angeles, CA 90012
11/15/10

RECEIVED
CITY OF LOS ANGELES

NOV 23 2010

ENVIRONMENTAL
UNIT

Re: Historic Highland Park Neighborhood Council Resolution in response to DEIR for Proposed Project: James Swan Hall, Occidental College-ENV-2010-653-EIR

Dear Ms. Kitching:

Occidental College is a shared resource for Highland Park as well as Eagle Rock. Therefore this project is of serious concern to the Historic Highland Park Neighborhood Council. In Historic Highland Park, we value our architectural treasures. The HHPNC Board has approved this Resolution.

In May, 2006 Occidental College's Board of Trustees approved a Master Plan, which currently governs these issues for the campus. Number One of the "Big 5 Ideas" (Master Plan May 8, 2006 3:1) is: "Restore and adaptively reuse existing buildings ... All design work on historic resources should be executed under the Secretary of the Interior's Standards for Rehabilitation." These standards are referred to throughout the DEIR, as well as many references to the unacceptable consequences that would cause "a substantial adverse change" And yet in the same document changes are proposed to do exactly that, including:

- Table 3A-3 Demolishing the defining features, and replacing them,
- Page 3A-23, "EIR, Historical Standards 2, 3, 5, 6, 9 and potentially 10 are not met"
- Page 3A-25 "The proposed project would result in the loss of a majority of the historic elements and materials of Swan Hall."

In addition, Measure 3A-4 calls for an experienced reviewer/monitor with carefully outlined parameters of comment and report. Will these comments be taken seriously?

However, there is an excellent third alternative proposed in the DEIR, which would substantially mitigate these inconsistencies, and offer an addition more in scale with the original building. The HHPNC would support the exploration of this alternative.

6-1

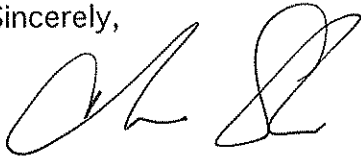
6-2

6-3

The renovation of Swan Hall will set a standard for the college's future work on the other historic resources on campus, and how the college will collaborate with its neighbors. In order to support the new Specific Plan being developed, and to be a partner with the College and its Trustees, HHPNC wants to see Swan Hall treated as an exemplar of Occidental's commitment to preserving the beautiful valuable buildings on its campus.

6-3
cont.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Smith', written in a cursive style.

Chris Smith, President
Historic Highland Park Neighborhood Council

Cc:

Linda Dishman, Los Angeles Conservancy
Councilman Jose Huizar, Council District 14
James Tranquada, Occidental College



Arnold Schwarzenegger
Governor

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



Cathleen Cox
Acting Director

November 23, 2010

RECEIVED
CITY OF LOS ANGELES

DEC 01 2010

ENVIRONMENTAL
UNIT

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

Subject: Occidental College Swan Hall Addition and Renovation
SCH#: 2010041044

Dear Diana Kitching:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 22, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

7-1

**Document Details Report
State Clearinghouse Data Base**

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

Type EIR Draft EIR
Description NOTE: Review per Lead

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.) The project required Conditional Use Authorization for an educational use in a residential zone. The project would meet LEED Silver standards. Swan Hall is one of the original Myron Hunt designed structures on the campus. It was constructed in 1914 and is a contributory structure to an identified Historic District.

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
Lat / Long
Cross Streets Eagle Rock Boulevard and York Boulevard
Parcel No. 5476-001-003
Township **Range** **Section** **Base**

Proximity to:

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

Project Issues Archaeologic-Historic

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

Date Received 10/06/2010 **Start of Review** 10/06/2010 **End of Review** 11/22/2010