



July 29, 2014

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Re: Comments on Orange Coast College Vision 2020 Facilities Master Plan PEIR

Dear Sir:

On behalf of The California Preservation Foundation (CPF), I am writing to express our concern over the proposed demolition of buildings and landscapes designed by nationally recognized mid-century master architects as part of the college's new plan. The California Preservation Foundation is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. CPF works with its extensive network of 1,500 members to provide statewide leadership, advocacy, and education.

Orange Coast College contains an unusual and nationally-important collection of educational buildings designed by master architects Richard Neutra and Robert E. Alexander, with landscaping by noted landscape architect Garrett Eckbo. Later additions include work by noted Orange County architect William Blurock.

This letter focuses on the inadequacies of the PEIR with respect to cultural resources.

1. **Failure to Identify Historic Resources:** The PEIR evaluates the campus core as eligible for listing in the California Register as an historic district under Criteria 1 and 3. Although the PEIR describes the criteria for listing under the National Register and the local Costa Mesa ordinance, it does not clearly determine whether the district is eligible for national and local listing. The PEIR identifies only one building, the Robert B. Moore Theatre building, as individually eligible for listing under criterion 3 of the California Register. There is no analysis of whether the other buildings designed by Neutra, Alexander or Blurock are also as eligible under criterion C of the National Register ("represents the work of a master") and criteria for local listing ("represents the work of a noted architect" and "exemplifies special elements of the city's cultural, architectural history").

While evaluation of the campus core as a district reflects the relationship among buildings and their cumulative effect as contributing structures, each of the buildings in the campus core also appears to be eligible for listing in the National, California and Costa Mesa Registers. Failure to identify them as individual historic resources (or even to discuss their individual significance), understates the

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significant adverse impacts of the Plan and prevents a full discussion of mitigation measures and alternatives. This deficiency is clearly shown by the alternatives analysis that considers only impacts to the historic district, and does not rank alternatives by preservation of individual historic structures.

2. **Inappropriately Narrow Project Objectives:** The PEIR lists 6 project objectives for the 2020 Master Plan (see page 6-1). None of the objectives require demolition of historic buildings. However, during the planning process for project alternatives, the proponent identified 3 additional project objectives, each of which mandates and requires demolition of the central core of historic buildings under the purported goal of “opening up the inner core of the campus.” For instance, in identifying a “central purpose” for the Plan, the PEIR adds objectives of “creating defensible space ... by opening up the inner core,” “develop[ing] campus zones and reorient[ing] new buildings” and “increas[ing] navigability ... and enhanc[ing] way finding in the center of campus.” Put simply, the proponent selected demolition and reorientation of the historic campus core as fundamental objectives of the project – not simply an unfortunate environmental effect. By adding “opening up the campus core” as a project objective, the proponent predetermined the outcome of the alternatives analysis. By definition, alternatives that preserve more buildings in the historic campus core cannot meet project objectives – because the objectives themselves include demolition and replacement of the buildings.

3. **Rejection of Full Preservation Alternative:** The PEIR rejects consideration of any alternative that does not permit the Planetarium building to be located at its newly planned location. Construction of a new Planetarium at a particular location is not a project objective, and the PEIR should have explained why it was infeasible to relocate the proposed new Planetarium. Instead, the PEIR simply states the proposed location is “best” for reasons that do not appear to relate to project objectives. If relocating the Planetarium to a different planned location is “feasible,” the project proponent cannot reject another location simply because it is not “best.”

4. **Rejection of No Project/Existing Master Plan Alternative:** The PEIR states the Existing Master Plan is “almost built out” and does not include any remaining large projects. Nonetheless, the PEIR concludes the 2020 Master Plan would have the same impacts to historic resources, because the Existing Plan contemplates clearance of much of the campus core for construction of a large mall. The PEIR does not discuss the likelihood that the demolition proposed in the Existing Master Plan will not be implemented because it does not meet current campus needs. The statement that no large projects remain under the Existing Plan is also inconsistent with the projection that historic resources would be demolished.

5. **Failure to Consider No Project/No Build Alternative:** The PEIR does not consider continuation of existing environmental conditions as a “no project” alternative. Although the PEIR analyzes a new Master Plan, it is also a project level EIR for a specific development project on identifiable property. Under these circumstances, the PEIR must compare the 2020 Master Plan with the environmental effects of the property remaining in its existing state, or what would reasonably be expected to occur in the foreseeable future if the Master Plan were not approved.

6. **Rejection of Maximum Reuse Alternative:** The PEIR rejects the environmentally superior Maximum Reuse Alternative because it does not meet the specially-added project objectives of constructing new buildings and “open[ing] up the inner core to create way-finding opportunities and defensible spaces.” As noted above, the PEIR adopted the objective of “opening up the inner core” (*i.e.*

demolishing the concentration of historic buildings) solely for the purpose of evaluating alternatives. A project proponent is not allowed to select such narrow objectives that only the proposed project can meet them, to the detriment of the environment. In this case, there is no evidence that the Maximum Reuse Alternative is infeasible, or that it fails to meet the main project objectives.

7. **Rejection of Strategic Reuse Alternative:** The PEIR finds the Strategic Reuse Alternative is “environmentally neutral” with respect to cultural impacts because it would not reduce impacts on the historic district to less than significant. This is not the test. If feasible mitigation measures or alternatives are available to reduce significant impacts, they must be adopted, even if the impacts to the district remain significant. In this case, the PEIR finds the Strategic Reuse Alternative is environmentally superior to the proposed project and meets project objectives by preserving a larger number of historic resources. Although the Strategic Reuse Alternative is superior to the project, it remains environmentally inferior to the Full Preservation and Maximum Reuse Alternatives.

8. **Rejection of Minimal Reuse Alternative:** The PEIR finds the Minimal Reuse Alternative is “environmentally neutral” with respect to cultural impacts because it would not reduce impacts on the historic district to less than significant. This is not the test. If feasible mitigation measures or alternatives are available to reduce significant impacts, they must be adopted, even if the impacts remain significant. In this case, the PEIR finds the Minimal Reuse Alternative is environmentally superior to the proposed project and meets project objectives by preserving a larger number of historic resources. Although the Minimal Reuse Alternative is superior to the project, it remains environmentally inferior to the Full Preservation, Maximum Reuse and Strategic Reuse Alternatives.

9. **Failure To Consider Alternatives and Mitigation Measures:** The project proposes to reorient pathways and buildings in the central core, with the pre-determined result that historic buildings will be demolished. In some cases, new pathways are drawn through historic buildings, as though they did not exist. To the extent the location of the pathways triggers demolition of individual historic buildings or the district, the PEIR must consider alternatives to the internal circulation and orientation proposals of the Master Plan. For instance, the PEIR should consider whether signage or other informational devices can provide the desired campus legibility. Lighting and security may be another method of achieving defensible space. New buildings may be redesigned to fit in existing open space. Under CEQA, all feasible alternatives must be evaluated and adopted before a public agency can demolish an eligible historic district for the purpose of “enhancing sight lines.”

10. **Inadequate Mitigation Measures:** The PEIR proposes 3 sets of wholly inadequate mitigation measures for demolition of the Neutra and Anderson-designed structures: recordation; architectural salvage; and an interpretive educational program. None of these measures substantially lessen project impacts. Recordation of an historic district is particularly challenging because of the need to document relationships among structures. Architectural salvage of midcentury modern buildings is difficult because of the general lack of detail and the minimalist design. For students, the best interpretive education program is for the college to respect the architectural heritage given to them by past generations, and to show them how to integrate it into a 21st century campus – not to relegate the work of master architects to plaques, models and tours.


Additional comments may be forthcoming with respect to other topics in the PEIR.

Mr. Jerry Marchbank

July 30, 2014

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Very truly yours,

A handwritten signature in blue ink, appearing to read "Cindy Heitzman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Cindy L. Heitzman
Executive Director

Cc: Deborah Rosenthal, Esq.
Amy Minter, Esq.
Alan Hess, AIA
Barbara Lamprecht, M. Arch.
John Linnert, AIAfile