

Comment Letter O1

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October 5, 2015

Submitted by email

Mr. Jerry Marchbank
Coast Community College District
Senior Director, Facilities Planning and Construction
1370 Adams Avenue
Costa Mesa, CA 92626
Email: jmarchbank@cccd.edu

Re: Recirculated Draft Program Environmental Impact Report (PEIR) for the Orange Coast College Vision 2020 Facilities Master Plan

Dear Mr. Marchbank:

On behalf of Southern California Chapter of Docomomo/US, I am writing to comment on the recirculated Draft Program Environmental Impact Report (Draft PEIR) for the Orange Coast College (OCC) Vision 2020 Facilities Master Plan. As an organization that works to promote the preservation and continued use of important Modernist places, and focuses on the unique and diverse architectural legacy of this region, we continue to have serious concerns regarding the current proposal to replace the historic Neutra and Alexander buildings and Eckbo landscapes on OCC's campus, particularly in light of a Historic Structures Report (HSR) completed by the reputable firm of Page and Turnbull that states that the campus is of national importance and that its buildings can, in fact, be reused in such a way that the objectives of the Master Plan can be achieved.

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A. Significance of Orange Coast College (OCC)

There is no disputing the fact that OCC's campus is of national importance. Neutra scholars, two different preservation consultants under contract with the Coast Community College District (CCCD), and national preservation organizations such as Docomomo US and the National Trust for Historic Preservation are all in agreement: the campus is eligible for listing on the National Register, a repository of the nation's most significant places.

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OCC possesses a rare concentration of educational buildings by one of Southern California's preeminent Modern masters, Richard Neutra and Robert Alexander. In the early 1950s, when OCC was designed and constructed, Neutra and Alexander were above all else exploring the social benefits of good design. They were experimenting

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with ways that access to natural light and air, the use of color, and creating seamless interplay between indoors and out can enhance well being and social interaction. Neutra and Alexander believed that a carefully designed educational campus could create a “landscape for learning,” in which the designed environment fosters creativity among its users and inspires knowledge and innovation.

The Orange Coast Junior College District Board showed incredible foresight and vision to select Robert Alexander to devise a plan for its campus in 1948, and then returning to select Neutra and Alexander to create its buildings and Eckbo its landscapes in the early 1950s. The campus was met with immediate acclaim and was published widely in journals throughout the world. Decades later, it was the recipient of an AIA Orange County 25-year award for its sustained architectural significance.

B. California Environmental Quality Act (CEQA)

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to “take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history.”¹ To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”²

The HSR prepared by Page and Turnbull proves that the Neutra and Alexander buildings **can be re-used** in an alternative that will achieve the goals and objectives of the master plan. This alternative is financially viable, environmentally sustainable, and if implemented, would convey the CCCD's deep understanding of and respect for its architectural legacy. Blatantly ignoring the findings of Page and Turnbull's HSR, which present a viable preservation alternative, is not only irresponsible but also a direct violation of the mandates of CEQA.

C. Conclusion

At Docomomo, which is an organization largely comprising educators and architects, we understand the challenges facing college boards to meet the ever-changing needs of campus facilities and the demands of increasing enrollment numbers. However, we have also seen so many examples where significant campus buildings have been

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

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retained, rehabilitated, and have become architectural capstones in the midst of growing, dynamic campuses.

We strongly urge the Orange Coast College to review and consider the thoughtful and thorough HSR it commissioned from Page and Turnbull. The demolition of the Neutra and Alexander buildings and Eckbo landscape will leave an indelible scar in the architectural legacy of Orange County and Southern California as a whole. To ignore their significance and the opportunities provided by their reuse in the larger plan of a vibrant, growing campus will be an embarrassment and a tragedy not quickly forgotten.

Thank you for the opportunity to submit comments regarding the recirculated Draft Program Environmental Impact Report. Docomomo would welcome the opportunity to meet and work with the District to explore alternatives to the proposed project. Please contact me at (626) 616-3976 or docomomosocal@gmail.com if you have any questions or concerns.

Sincerely,



Katie E. Horak
President, Docomomo/US, Southern California Chapter

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Response to Comment Letter O1

Docomomo U.S., Southern California Chapter

O1-1 Docomomo/U.S., Southern California Chapter comments that they have serious concerns about the proposed 2020 Facilities Master Plan because under the proposed project a number of the Neutra/Alexander-designed buildings would be replaced. Furthermore, the commenter states that the Page & Turnbull Historic Structures Report indicates that the buildings can be adaptively reused, and the objectives of the Master Plan can be achieved. OCC staff and faculty do not believe that the objectives of the Master Plan can be achieved by an alternative that preserves a significant number of the Neutra/Alexander-designed buildings because these buildings cannot be adaptively reused for current academic department space needs like the Planetarium, Dance, Language Arts and Social Sciences, a Student Union, Physical Education, or Chemistry. Each of these academic buildings has particular space requirements that cannot be met without significantly altering the Neutra/Alexander-designed buildings. However, a Full Preservation Alternative was included in the PEIR by the District as it is the only alternative that avoids a significant impact to historic resources under CEQA. The other three alternatives were also included because they would lessen the impact to historic resources while at varying costs to the District and with varying levels of success in meeting the educational goals and objectives of the Master Plan.

In sum, the Full Preservation, Maximum Reuse, Majority Reuse, and Significant Reuse Alternatives fail to accomplish the project objectives in the District's vision including:

- They are inconsistent with Measure C and Measure M communications to constituents that bond monies would be used for modernization and new construction, and instead uses those monies for preservation and adaptive reuse of existing buildings;
- They do not provide the District or College with long-term flexibility in instructional space to meet the academic needs and mission of the college because the Neutra-designed buildings would have to be significantly modified, in some cases beyond recognition, to meet space and instructional requirements;
- They do not provide the College with modern teaching and learning facilities;
- They do not increase navigability or wayfinding on campus because the Neutra-designed buildings impede lines of sight across the campus;

- They negatively impact the District’s capacity-load ratios which jeopardizes the College’s eligibility for State Capital Outlay Bond Funds. If adaptively reused, the repurposed square footage would count toward the total allowable square footage for lecture, laboratory, office, library, technology or other service space. This reduces the College’s ability to build new space which better meets the institutional needs;
- They do not meet the needs of the Dance program which cannot be instructionally supported by adaptively reusing the Neutra-designed buildings;
- They do not promote safety and security on campus as the Neutra-design buildings have wing walls, niches and other spaces conducive to hiding, the buildings impede visibility across campus, the building layout and clearances limit access for emergency response vehicles, and the significant number of manually-locked exterior doors are inconsistent with current access control standards and result in operational inefficiency as doors must be manually locked by security personnel;
- They do not allow for the creation of campus zones which is a fundamental objective of the facilities master plan;
- They do not increase student and employee engagement by providing a hierarchy of exterior socialization spaces, nor do they create a defined and sustainable campus quad because configuration of the Neutra-designed buildings makes this impossible; and
- The projected cost to rehabilitate and adaptively reuse the Neutra-designed buildings in the campus core is \$42 million dollars (Page & Turnbull Historic Structures Report 2015, Coast Community College District Alternatives Cost Summary, 4/12/2015), as compared to \$24 million dollars for the preservation cost for the proposed project, diverting significant capital away from the District’s educational mission, which includes compliance with the Accreditation Commission for Community and Junior Colleges (ACCJC) standards specified below.

With the alternatives, the College is not in compliance with the accreditation standards applicable to community colleges set forth by the Accreditation Commission for Community and Junior Colleges (ACCJC). Specifically, the alternatives do not meet the following standards:

- ACCJC Standard III-B(1), which requires the College to have “sufficient physical resources to assure access, safety, security, and a healthful learning and working environment.” The record contains comments from College faculty explaining that the current environment is not sufficient for learning and working;

- ACCJC Standard III-B(2), which requires the College to update and replace its physical resources; and
- ACCJC Standard III-B(3), which requires the College to plan and evaluate “physical resources to support institutional programs and services.” Rather the alternatives propose that college programs and services be adapted to fit existing physical resources.

Table 3-4 in the Draft PEIR shows the planning criteria objectives and ranking that the District developed and vetted through a months-long planning process at OCC with 77 staff and faculty involved in the process. Planning criteria objectives were organized into six categories: community, learning and quality education, access, stewardship, student and employee engagement, and other/non-mission critical. The District evaluated each of the proposed alternatives (which were developed using the Page & Turnbull report as a basis) and the proposed project against these planning objectives and developed a scoring system (1=acceptable/meets objective and 0=deficient/does not meet objective). In addition, the planning criteria were weighted based on whether they were a low priority objective (weight of 1), an intermediate priority objective (weight of 2), or a highest priority objective (weight of 3). The table shows that the proposed project (Strategic Reuse) best meets the planning objectives with a score of 53 and that the ability of the alternatives to meet the objectives of the educational master plan decrease as the amount of preservation of resources increases (from 30.5 to 12). This relationship is directly related to the fact that the Neutra/Alexander-designed buildings would need to be adaptively used mostly for ancillary uses and support functions, such as student lounges and gathering spaces, rather than designed as spaces meeting the academic mission of the campus, because the buildings are configured and designed in such a way that they cannot be upgraded to meet the current academic mission which requires certain space needs (see Linda Sohl-Ellison’s letter I-2 about the dance program) or meet the growth and technology needs of a new Planetarium, STEM center, or the sizing requirements of competitive athletic facilities (e.g. Olympic-sized pool). In order for the District to keep and upgrade and adaptively reuse the Neutra/Alexander-designed buildings, it diverts public monies from the construction of new buildings and may penalize the District from receiving future State Capital Outlay Bond Funds.

O1-2 The District has complied with CEQA in accurately documenting impacts to historic resources by inclusion of two historic reports in the PEIR so that impacts could be disclosed to the decision-makers and the public. The District recognizes that the campus is eligible for listing on the National Register, as is discussed within the Orange Coast College Historic Structures Report (Page & Turnbull 2015).

- O1-3** The fact that Neutra and Alexander believed that a carefully designed campus could create a “landscape of learning” was true for the campus at that time. Today, the landscape of learning has changed beyond what Neutra and Alexander could anticipate, and the buildings and their configuration no longer meet the needs of a twenty-first century learning environment which requires buildings that can be easily adapted to new technologies with flexible space to support group learning environments, the need to configure the campus more efficiently so that buildings housing similar subject areas are close to one another, opportunities to maximize energy efficiency and reduce maintenance costs over time, and an opportunity to create defensible space and lines of sight between buildings.
- O1-4** The PEIR includes alternatives to the proposed plan which include four different preservation/reuse alternatives (e.g., Full Preservation, Maximum Reuse, Majority Reuse, and Significant Reuse Alternatives). These alternatives look at progressively greater preservation of the Neutra/Alexander-designed buildings and what it would mean for configuration of the campus master plan and how the education goals could or would not be met through increasing preservation of these resources. The alternatives vary in the extent to which they meet the planning criteria objectives (as shown in Table 3-4) and the alternatives will be presented to the Board of Trustees who will have to weigh the goals of preservation with the educational objectives of the District. What the *Sierra Club v. Gilroy City Council* case tells us is that if there is substantial evidence in the record to support the findings and decision to certify the EIR, then the lead agency does not have to deny a project because it has significant adverse effects, and it does not have to choose the least impacting alternative. As the comment indicates, a lead agency should not approve a project with significant adverse effects when feasible alternatives or feasible mitigation measures can lessen the effects.
- O1-5** The Page & Turnbull Historic Structures Report was commissioned by the District, and the alternatives developed in the report were used as a basis for the alternatives carried forward in the PEIR. The full preservation alternative does not allow the district to meet their educational objectives. The Board of Trustees will first and foremost consider OCC’s students and their needs, and balance that with the desire of a segment of the larger community who would ideally like to see a Full Preservation Alternative implemented on campus.

CEQA defines “feasible” as “capable of being accomplished in a *successful* manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Public Resources Code section 21061.1 (emphasis added). For an alternative to be feasible, it must be “successful” at achieving the

project's objectives. Thus, an alternative may be rejected as infeasible if it "would not fully meet the project objectives...." *Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1400.

Here, the Page and Turnbull report did not analyze feasibility within CEQA's meaning. Rather, the Page and Turnbull report considered whether the buildings could physically be re-used. The Page and Turnbull report did not analyze whether re-use would meet the project objectives. As such, the Page and Turnbull report does not opine that re-use is feasible within CEQA's meaning.

O1-6 Thank you for recognizing the challenge facing the Board of Trustees to meet the ever-changing needs of campus facilities and the demands of increasing enrollment numbers. There are examples of campuses that have successfully retained and rehabilitated campus buildings. The Draft EIR does not ignore the buildings' significance. One of the unique challenges facing OCC is the number of buildings (23 buildings were identified by Ostashay & Associates and 15 by Page & Turnbull) that have been deemed historically significant and their location (all in the central core of campus). The number of buildings and their concentration in the core of campus is different from other college campuses that have fewer historic buildings or ones that are not all set within the campus core.

O1-7 As part of the Draft EIR preparation process, and with the engagement of Page & Turnbull to prepare a Historic Structures Report, plus the involvement of District faculty and staff, the District has already explored alternatives to the proposed project. Thank you for your interest in this project.