



April 20, 2026

UC Berkeley Capital Strategies
Physical & Environmental Planning
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UC Berkeley Physical & Environmental Planning:

The Berkeley Architectural Heritage Association received the Notice of Preparation for a Draft Subsequent Environmental Impact Report for the Channing-Bowditch Student Housing Project. Our organization has reviewed the available project description and associated visual documentation.

Changes to Project Objectives:

Rationale needs to be provided in the Draft SEIR

We are deeply concerned that the proposed project dramatically increases the scale of redevelopment at the site. This is highly unfortunate, as the redevelopment project analyzed under the Long Range Development Plan (LRDP) EIR was an academic or campus life structure limited to 210,000 square feet and 8 stories in height. Such a redevelopment project, although it would likely have some unavoidable impact on the cultural resources on the site, would have more easily preserved the most significant features of the National Register campus. In fact, University-commissioned planning studies specifically examined the possibility of preserving Channing Hall—the key historic structure embodying the most architectural and historic significance—as part of redevelopments approximating the scale contemplated in the 2021 LRDP EIR.

The proposed project converts the project to a student residence, increases the proposed area more than two-fold, and increases the height by more than three times. In an attempt to honor the historic significance of the site, the project chooses to preserve only peripheral structures that neither embody the importance of the site for California's architectural history nor bear any direct association with the work of Anna Head, the pioneering founder of the women's preparatory school

that long occupied the campus.

The Draft SEIR will need to discuss the rationale behind this dramatic transformation of the redevelopment proposal in addressing why any impacts, especially those to cultural resources, should be deemed unavoidable.

Feasible Alternative Projects Exist that Preserve Channing Hall

Despite the dramatic increase in project objectives, there are still alternative project designs that meet these objectives and mitigate impacts to cultural resources by preserving Channing Hall, the key cultural resource on the project site.

One particularly viable scheme would move Channing hall to the corner of Channing Way and Bowditch Street and develop the residential high-rise immediately behind the historic structure. Please see the appended Figures 1 through 4, which describe this alternative and compare it with the proposed project. This alternative design meets the project objectives and has several advantages over the proposed project:

- The residential high-rise would continue to have a similar podium layout and program, as well as a similar overall massing.
- Adding approximately one floor to the project would provide a similar square footage compared to the proposed project.
- The central “Shared Glade” is maintained.
- Channing Hall continues to have a visual relationship with nearby University-owned buildings that respond to it architecturally.
 - Maximio Martinez Commons
 - Channing-Bowditch Apartments
 - Residential and Student Services Building
- Channing Hall provides added architectural interest along Bowditch Street. (The proposed project lines Bowditch exclusively with back-of-house functions.)
- The north tower has a reduced shade impact on Channing Way, as it is set back behind Channing Hall.

This is but one of many possible alternative designs that preserve Channing Hall, but this scheme demonstrates that it is clearly possible to accommodate Channing Hall on the site and meet all the project objectives laid out in the NOP. It is not even necessary to abandon many of the design strategies of the proposed project.

Why is preserving Channing Hall feasible?

Viable design schemes accommodate Channing Hall on the site, but we would also like to outline reasons why relocating and rehabilitating Channing Hall should not

be discounted as infeasible.

In previous statements to the public and the press, the University has asserted that it simply can't afford to retain and rehabilitate Channing Hall, any analysis of financial feasibility needs to take into account the financial benefits of retaining the building.

- Much like the other historic structures that the University proposes to retain, Channing Hall can provide space for campus life functions that would otherwise require space elsewhere in the project. Such functions might include study spaces, offices, or even distinctive dwelling units. Any analysis of rehabilitation cost should subtract the cost of providing the equivalent amount of space as new construction.
- Retaining the architecturally distinctive building would automatically lend a distinctive identity to the proposed project. The building also contains historically significant interior spaces that would lend associated functions a distinctive setting and authentic historical weight that would be very expensive to recreate through premium finishes and detailing in new construction. In other words, Channing Hall provides value to the proposed project that would otherwise need to be made up for with added expense. This is another reason why rehabilitation does not simply represent an added expense; it represents a prudent investment.
- Preserving Channing Hall adds architectural pedigree and a connection to University history that could aid in fundraising efforts. This could additionally offset the cost of rehabilitation.

Furthermore, nothing about relocating and rehabilitating the building is unusually technically challenging or in any way infeasible.

- As a wood frame structure, relocation is technically achievable, especially over the incredibly short distance proposed. In fact, the opportunity to create an all-new foundation for the existing structure may provide some advantages.
- Many feasible seismic retrofit options are available for Channing Hall, especially if it can be reinforced with structural tie-backs to a new residential tower.
- Lastly, bringing the building up to modern fire egress and accessibility standards could be resolved by connecting Channing Hall directly to the new residential structure at upper floors (at the rear elevation) This could allow spaces within Channing Hall to make use of egress stairs and elevators in the new structure.

These are but a few of the reasons that preserving Channing Hall is not only feasible but a prudent investment of the University's resources. A Draft SEIR would need to address all these points and more in order to establish that demolishing Channing Hall is unavoidable.

As noted in the NOP, the University will be preparing a "reasonable range of potentially feasible alternatives to the proposed project" that will be analyzed in the Draft SEIR.

These alternatives will be absolutely critical in determining whether impacts to cultural resources, in particular, are unavoidable. Because of the singular significance of Channing Hall, the University should analyze alternatives that both preserve the building in situ and relocated on the project site. As demonstrated above, design schemes exist that preserve Channing Hall and are neither infeasible on the basis of failing to meet project objectives nor on the basis of the expense required to rehabilitate the historic structure. If the University asserts otherwise, it will need to address in detail the arguments and evidence presented herein and elsewhere.

**Partial Mitigations to Unavoidable Impacts:
Adequate Provision for Documentation and Salvage is Critical**

We recognize that some impact to cultural resources may be unavoidable as part of the proposed project. For these unavoidable impacts, the partial mitigations will need to include thorough documentation of the cultural resources. As noted in the LRDP EIR, documentation should be to Historic American Building Survey standards. Furthermore, there are additional factors to keep in mind for the Anna Head site

- The architectural and historic significance, as noted in the 2008 Historic Structure Report, is embodied in the complex design of the campus, both the result of architectural artifice (in the case of Channing Hall) and a long history of accrued additions. Architectural documentation of the campus needs to adequately record the relationships between campus structures as well as the architectural details that create the appearance of change over time. Channing Hall, in particular, has exterior details and interior architectural features that require documentation, preferably in the form of large-scale measured drawings in addition to HABS-compliant photography.
- The University should also make provision for cultural resources discovered during construction. This is a part of standard CEQA Guidelines, but applies particularly to the Anna Head site. The Anna Head School's cultural significance is derived in part from its landscape, which has been much altered over time.

However, many aspects of this historic landscape may be uncovered during site preparation for a project. The University should make provision to document any unanticipated and significant site features that are revealed in the course of demolition and construction. The Anna Head School Campus was also occupied for more than a century, and some of its historical significance stems from its site as the operation of a pioneering women's preparatory school. It was also the longtime home of the Institute for the Study of Societal Issues. If the project demolishes significant buildings occupied by these entities, artifacts and architectural elements significant to these occupations may be uncovered that were previously inaccessible, and the University should make provision to adequately document these artifacts and elements, and, if appropriate, deliver them to an appropriate repository.

- Lastly, the Anna Head Campus contains historically significant vegetation. This vegetation includes mature Canary Palms, a type of plant generally takes well to relocation. the University should make every effort to relocate the palms and preserve them on site, and, if that is not possible, offer them as salvage items.t

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For the last 50 years, our organization has facilitated the stewardship of Berkeley's historic structures by supporting preservation work, landmark designation efforts, archival research, and advocacy efforts. Throughout that period, the Anna Head School Campus has been a site of preservation concern, as inadequate preventive maintenance allowed the condition of campus structures to deteriorate. Redevelopment of the Anna Head Campus will impact the extremely significant cultural resources on the site, but prudent investment in the rehabilitation of Channing Hall represents an opportunity to finally showcase common sense stewardship.

Respectfully,

Isaac Warshauer

on behalf of the BAHA Board of Directors



Figure 1: Site Plan of Proposed Project



Figure 2: Alternative Site Plan retaining Channing Hall and relocating it to the corner of Channing Way and Bowditch Street.

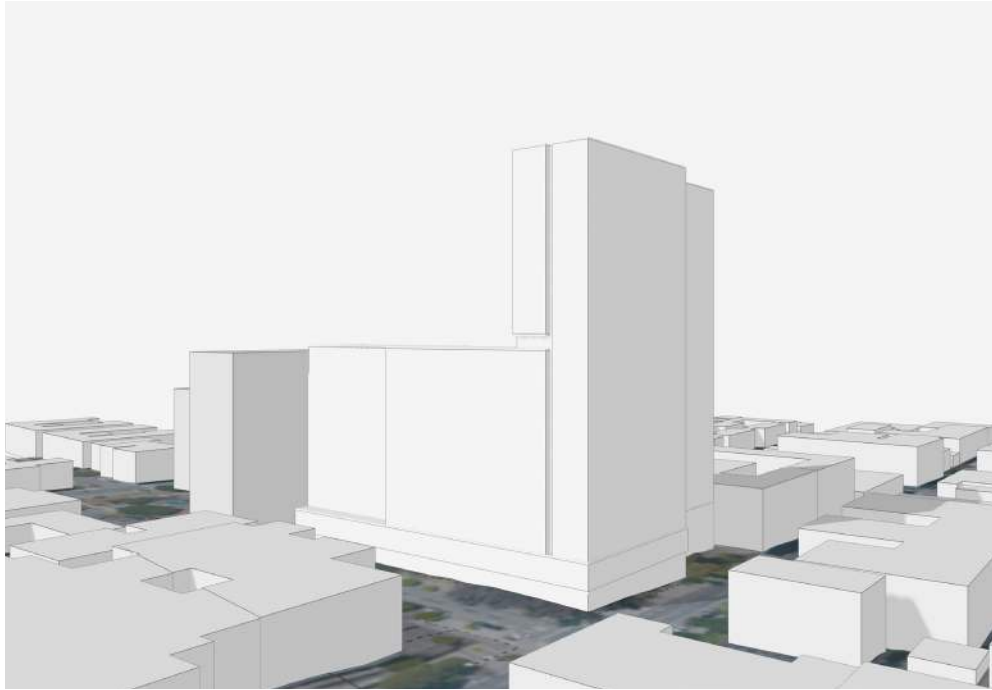


Figure 3: View of Proposed Project from the northeast.



Figure 4: View of an alternative design retaining Channing Hall and relocating it to the corner of Channing Way and Bowditch Street.