

CHAPTER 4: CORRECTIONS AND ADDITIONS

CEQA Guidelines section 15088.5 requires:

- (a) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability . . . "Significant new information" requiring recirculation include, for example, a disclosure showing that:*
- (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*
- (c) *If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.*
- (d) *Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.*
- (e) *A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.*

As a result of further analysis and discussions with the Los Angeles Conservancy, Alternative 2 is revised as follows (new text is underlined, deleted text in strike out). With these changes, Alternative 2 is now the preferred alternative of the project applicant, Occidental College.

All of the changes to the Draft EIR presented below represent insignificant modifications in an adequate Draft EIR. Therefore, the Draft EIR need not be recirculated prior to certification.

4.5 Alternative 2: Preservation Alternative with Three-Story Addition

This alternative would preserve Swan Hall in accordance with the Secretary of Interior Standard's for Rehabilitation. The three-story addition would be as proposed for the project but the connection to Swan Hall would be differentiated by stepping it in about 12 inches deep (16 inches wide) on either side of the connection running from the ground to the roofline, thereby preserving much of the quoining around the original ground floor entrance and recognizing the tripartite division of the building. ~~not overlap the roof of the current building.~~

Environmental Impact

This alternative could meet the Secretary of the Interior's Standards through the retention of exterior materials and application of structural reinforcement from the interior of the existing façade. The level of seismic safety would be the same as the proposed project.

The Preservation Alternative would ~~include use the same structural solution as the proposed project with~~ new reinforced concrete shear walls at the north and south ends (where the hollow clay tile has already been substantially repaired and changed as a result of past damage) of the building and in strategic locations throughout the structure, including and in the same locations behind the exterior façade and between windows as the proposed project. The interior layer of hollow clay tile would be cut and removed. The exterior layer of hollow clay tile is not anchored to the existing structure, therefore it would need to be secured in place. Areas of the tile wall were damaged in the Northridge earthquake and care must be taken ~~not~~ to reduce further damage to these areas. The original exterior façade including the hollow clay tile would be anchored ~~into the~~ new structural systems consisting of a combination of concrete shear walls and steel supports concealed behind the original facade. The facade will further be reinforced with a continuous membrane adhered to the back of the hollow clay tile with anchors protruding into the concrete as well as steel pinning from the outside concealed behind the existing plaster exterior. As a part of this alternative the existing plaster would be retained and repaired as feasible; the existing paint and elastomeric coating that is trapping moisture in some locations must be removed and a new coating will be installed that allows the original texture to telegraph through. Since installation of new shear walls would require opening up wall cavities on the interior side to install structural work, the interior wall would be re-built from modern materials to retain the original configuration.

The original window frames would be left in place for repair/replacement as needed (where possible) and the original window sashes would be rehabilitated. Under this alternative, utilities and building systems (mechanical, electrical, plumbing) would be replaced similar to the proposed scheme. Similarly, since the interior floor level layout is not considered character-defining, the re-building of new flat floor slabs in the center of the building (Middle Swan) to aid accessibility (ADA – Americans with Disabilities Act) and improve the adaptive re-use of the original dormitory building would meet the Standards.

To meet the Standards, the central (Middle Swan) entry doors on the Quadrangle (east elevation) would remain operative to maintain the longstanding connection to the main campus quadrangle. The proposed project retains the two flanking entries on the Quadrangle and provides an internal vestibule with access to an elevator and steps to reach the new floor level. (These doorways may no longer serve as the main access into the building.) The proposed project would reconstruct the central entry and doors (Middle Swan) from the exterior, but the floor level would be raised behind the doors and enclosed for office space. To meet the Standards, the Preservation Alternative includes a vestibule ~~and stair connection~~ behind the central entry doors allowing these doors to remain operable. ~~Alternatively, the construction behind the doors could be reversible with the possibility of removal for access. At a minimum, any interior layout that prevents use of the original entryways should be reversible.~~ The west decorative entry doorway would be removed, but prior to doing so a mold of the doorway surround would be made and stored for future reference also be retained in form or profile sufficient to recall the original doorway although changes would be necessary for the new addition to connect. The proposed scheme has a partial re-use of the connecting doorway but little retention of original materials or opening sizes. Similar to the

proposed scheme, the roof tile would be salvaged and re-installed and the carved wood roof eaves would also be retained and where needed, repaired in place.

With the project, the proposed addition would be larger in square footage and taller in height than Swan Hall. The main body of the addition would be located 26 feet away from the west side of the original building and would not be immediately visible above the Swan Hall roof when viewed from the Quadrangle immediately in front of Swan Hall (although it would be partially visible from in front of the buildings across the Quadrangle). With the project, the connecting structure would touch the original building and would mimic the original roof; it would also overlap the massing of the original building thereby subsuming the Swan Hall building into the larger project that would not meet the Standards. To meet the Standards, the Preservation Alternative would include a connecting structure ~~no taller than the overhanging eaves of the original building that does not overlap the top of the original building so that the edge of the original roof would remain continuous~~. that is distinguishable from the original building by varying detailing and textures. Only the distinct visual separation between original building and the addition allows for the larger size of the addition to meet the Standards.

The center portion of the original west facade projects out approximately eighteen inches and is highlighted by plaster quoins running the full height of the facade at the corners of this element. This tripartite division accentuated by the decorative corners would be obscured by the project as originally proposed. The Preservation Alternative would add a stepped reveal (notch) at the connection of the Addition to the original building (approximately 16 inches wide by 12 inches deep running from the ground to the roof) that would highlight the tripartite division of the west facade and existing plaster quoins.

~~The addition would also more clearly meet the Standards if the connecting structure did not totally obscure the tripartite division of the original building. The center portion of the original building projects out approximately eighteen inches and is highlighted by plaster quoins running the full height of the facade at the corners of this element. The tripartite division accentuated by the decorative corners would be obscured by the proposed project. The Preservation Alternative would narrow the connector piece enough to reveal the corner decoration, resulting in a connecting structure that tapers to about 24 feet wide as compared to 30 feet wide with the proposed project, or would have a notched area in plan adjacent to Swan Hall that exposes the original central facade's corners.~~

This alternative would be undertaken under the supervision of a qualified architectural historian with knowledge of construction techniques to ensure that historic fabric was preserved as appropriate to meet the *Secretary of the Interior's Standards for Rehabilitation*. Mitigation Measures 3A.3 through 3A.7 would continue to apply to this alternative; Mitigation measures 3A.1 and 3A.2 would not be required.

Comparison of Preservation Alternative with Three-Story Addition to Secretary of the Interior's Standards for Rehabilitation

The Preservation Alternative is analyzed below for compliance with the Secretary of the Interior's Standards for Rehabilitation.

Standard 1. Swan Hall was adapted from residential dormitory uses to academic offices in 1960, both uses that supported the residential college's educational mission. The 1960 project reconfigured interior

spaces. The Preservation Alternative again would reconfigure the interior to support ongoing academic requirements. The Preservation Alternative continues a use that supports the purpose of the College's historic mission. In addition, there is little original historic fabric in the building's interior, so the proposed changes would not impact any historic interior features. The Preservation Alternative would comply with Standard 1.

Standard 2. The Preservation Alternative would repair the exterior cladding. Other than at the north and south ends of the building (where several of the quoins – corner details -- are replicas made of polystyrene) and where the addition would connect, architectural details such as quoins (~~corner details~~), window and door surrounds would remain and be repaired in place if repairs are needed. As with the project, the north and south entrances on the east façade would be operable. In addition, under this alternative the middle entry on the east facade would be open and would provide access ~~closed no longer providing access.~~ As with the project, the original west entry would be removed (a mold would be made) and reconfigured for a direct connection to the new addition. The opening sizes would be modified and the decorative surround omitted. The Preservation Alternative would retain most of the exterior historic fabric. While the central door on the east façade would become inoperable, it would remain in place.

The connection to the new addition would be located on the west elevation, which is effectively the rear elevation, as it does not face the quadrangle open space. As such it is the best location to attach a building addition. In the Preservation Alternative the connector piece would ~~be narrower and thus would reveal the corner decoration or would~~ have a notched area in plan adjacent to Swan Hall that differentiates the new structure from the old ~~exposes the original east façade's corners.~~

The Preservation Alternative would retain and preserve the historic character of the building through retention of its exterior historic fabric, features and spatial relationships that characterize the property. The narrower stepping back (12 inches deep, 16 inches wide) at the building addition connection would serve to differentiate the new structure ~~option further reduces loss of historic fabric and features.~~ The Preservation Alternative would comply with Standard 2.

Standard 3. The Preservation Alternative would retain the building's exterior except for the area on the rear, west façade, which would connect with the Addition. The connection would not create a false sense of historical development as the building addition is designed to be distinct, yet compatible, with the original building. The Preservation Alternative would comply with Standard 3.

Standard 4. Standard 4 is not applicable to the Preservation Alternative as there are no changes to the property that have acquired historic significance in their own right.

Standards 5 and 6. The distinctive exterior features of Swan Hall would be retained and preserved. Deteriorated historic features would be repaired rather than replaced. Historic exterior features of the building including quoins (corner details), window and door surrounds, and window frames would be repaired in place (other than at the north and south ends where substantial intervention has already occurred as a result of previous repair work, and where the Addition structure would connect). Window sashes would be removed and salvaged for repair and reinstallation. Original doors would be removed, repaired and reinstalled (except the door on the west façade where the addition would connect). Entry surrounds would be repaired in place. Roof eaves would be retained and repaired where needed. Roof

tile would be removed and reinstalled. The Preservation Alternative would comply with Standards 5 and 6.

Standard 7. The condition of the exterior plaster is not completely known and removal of an earlier elastomeric coating ~~may~~ would be necessary. Repair and in some areas a new finish coat may be required. These areas would be repaired with as minimal impact as possible to the overall plaster construction. While the finish coat may need substantial repair, the overall plaster assembly would remain intact and the repair would match as close as possible to the original finish, thus this process would comply with Standard 7.

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

Standard 9. This Standard concerns the possible changes from additions including minimizing loss of historic materials and differentiation of old and new while providing a compatible addition. A new building is proposed to the west of Swan Hall that would be attached to Swan Hall at the center of its west façade by a narrow building element. The proposed addition is larger in square footage and taller in height than the original building. The main body of the addition is not immediately visible above the Swan Hall roof when viewed from the Quadrangle. The Addition under the Preservation Alternative would consist of a connecting structure that would be stepped back (12 inches deep, 16 inches wide) to differentiate the new structure from the old ~~be no taller than the overhanging eaves of the west side of the original building and would not overlap the top of the original building.~~ The connecting structure would be distinct from the original building. The Preservation Alternative would comply with Standard 9.

Standard 10. The new exterior design of the Addition would generally leave the original building unchanged, except for the north and south facades that have experienced substantial intervention over time and the central area of the west façade where the new connecting structure would be located. The Addition under the Preservation Alternative would maintain the original roofline to the extent feasible and decorative detail at the location of the connection. The middle door in the east façade, as well as the north and south doors would be operable. The Preservation Alternative also includes a new floor slab at a level that is above the original main entry door threshold on the Quadrangle (east façade) that would block use of the central doors. The doors would be retained in place; at a future date the slab could be modified to allow for use of the doors. Thus this change could be reversible and therefore potentially consistent with this standard. The Preservation Alternative would comply with Standard 10.

The Preservation Alternative would meet all of the Secretary of the Interiors Standards for Rehabilitation (Standards 1 through 10).

Comparison to Project Objectives

This alternative would meet the following project objectives:

To address seismic safety concerns associated with a building that is nearly 100 years old.

To remodel, reconfigure and renovate a dysfunctional building in order to improve accessibility and support the campus need for faculty offices and lounge areas, modern teaching facilities including seminar rooms, flexible instruction areas, informal meeting spaces, and new/expanded psychology experiment and interview rooms.

To provide additional faculty offices and meeting space in a building that encourages and supports communication between faculty and students in a pleasant and efficient manner.

To abate hazardous lead paint and asbestos present in building materials.

To meet sustainability objectives for the campus by designing the renovation and addition to meet LEED Silver Standards.

This alternative may not fully address the following objectives, but the College has agreed that preservation as proposed in this alternative would offset the time and cost disadvantages:

To preserve the historic Swan Hall Building in a cost effective manner that will allow it to be a vital part of campus operations while maintaining the appearance of the historic quadrangle located east of Swan Hall. Occidental College has and will continue to seek to maintain the historic character of its Myron Hunt buildings while ensuring that its programmatic needs are met.

To undertake renovation activities in a timely manner in order to allow faculty and staff to move back in to the building as quickly as possible.

~~The Project Architect believes that preserving the hollow clay tile and exterior plaster as proposed in this alternative may not be as cost effective as the proposed project. In addition the Project Architect has indicated that preservation of the tile and plaster may result in additional construction time as compared to the project as proposed potentially resulting in faculty and staff being unable to move back in to the building as quickly as anticipated with the proposed project. However, as noted below there may be elements of the project as proposed that could add to construction time.~~

The total cost of renovating Swan Hall under the proposed project is estimated at \$7.86 million, with an additional \$10.92 million required to construct the Addition and \$1.02 million for temporary facilities.

Two estimates, one by an estimator retained by the Project Architect (the Cumming estimate, see Appendix C.2) and one by a peer review estimator (the O'Halloran estimate, see Appendix C.1, KCK Historic Resource Assessment) identify the *additional* cost of the Preservation Alternative as follows:

Cumming Estimate: \$1.95 million (1.5 million in construction costs plus \$450,000 in soft costs)

O'Halloran Estimate: \$816,000 to \$1.16 million (566,000 in construction costs plus \$250,000 to \$450,000 in soft costs).

Both these estimates assume that the north and south walls would be rehabilitated. However, recent exploration of those walls shows that considerable intervention has already occurred there ~~in these~~

locations (as well as portions of the west wall) and reconstruction with new materials (including removal of the hollow clay tile) ~~is the most~~ ~~may be an~~ appropriate preservation approach ~~there~~. If the north and south walls were not included in the preservation estimates above, the difference in costs would be somewhat reduced for both, ~~resulting in both estimates of the increased costs of preservation being less than identified above.~~

The difference between the two cost estimates raises a number of issues about cost and scope of the proposed project as compared to the preservation alternative. There are a number of issues that account for some of the differences. The proposed project calls for extensive matching of existing building details. The Project Architect specifies use of laser scanning and other documentation of the building prior to demolition. Use of this software by contractors and translation into construction documents is speculative. Contractors and subcontractors are not used to working with such documentation as a basis for their fabrication and construction. The Cumming estimate calls out that standard bid procedures and contracting are assumed. Such a process may not fully allow for accurately matching the existing building and could lead to quality control issues in the matching and/or additional costs. Some details are more certain in the preservation scheme such as location of original window frames that will remain in place unless replacement is required.

Throughout the building's exterior are a number of plaster details that would need to be recreated in the proposed project. Since existing details are already in place, there is no more work involved in the preservation alternative, and more work could be involved to create those details for the project. For the structural work, the existing exterior wall would be able to serve as the outer formwork for installation of concrete shear walls. A deduct for conditions such as in-place formwork has not been accounted for in the Cumming estimate of the preservation alternative. The need to precisely engineer new shear walls in a fully new exterior wall configuration would require additional coordination to get the correct dimensioning ~~correct to be able~~ to accurately build the new finish façade on the exterior.

The Cumming cost estimate indicates substantial added work needed for the exterior plaster. No studies are currently available to indicate that the plaster would need such extensive intervention; existing plaster appears to be generally intact and in place. The stabilization of the building structural system would further minimize potential for damage or loss. Some areas were repaired following the 1994 Northridge Earthquake. A two-sheet document with damage photos and partial plans indicates that typical plaster "X" cracking occurred between openings. The damage is limited to the short end walls of the building (north and south) and the immediate corners. There is one area of plaster roughly 4 foot x 4 foot that has broken off the wall on the south at the east corner. A slightly grainier plaster texture may be evident at this location. It is not documented and not that evident in many locations, but the plaster skin may have been covered or partly coated by a textured or elastomeric paint. There is no obvious visible evidence of fundamental moisture or other damage issues, other than in small, localized areas. If a coating has been applied, it could be removed without altering the basic construction assembly. The underlying improvement to the stability of the building through new shear walls and floor slabs as well as membrane behind the clay tile would make the existing plaster much more stable than previously in a seismic event.

The Cumming cost estimate identifies additional soft costs for the Preservation Alternative (A&E, Construction Management fees) but does not indicate additional costs for details and reviews to ensure a satisfactory replication that would not be necessary in the preservation project. It is anticipated that

additional work would be needed by the Project Architect for the proposed project to ensure accuracy in as-built conditions and replication in the field with modern construction specifications and techniques. One example is the work needed to help ensure that individually cut window and frames can be reinstalled in a replication structure (proposed project) that is constructed based on typical details rather than full original details and dimensions. In the case of the window frames, more documentation and inventory may be needed if they are all removed as with the proposed project as opposed to being left in place for repair or replacement. The proposed project would rely on extensive documentation and cataloging to keep various parts of the window assembly together. The reinstallation of window frames in the new structure may be an issue because the original hollow clay tile construction is not precise and there are a variety of fluctuating dimensions for window opening size and depth in the existing walls. Questions of use of familiar modern construction details in the proposed project by subcontractors would need to be managed to maintain original profiles. The time necessary for this work may not be fully reflected in the proposed project fees. The building systems, interior layout and other internal workings of the building would be almost identical in both schemes, so there should be little change in the Architect's work for the vast majority of the building components in the Preservation Alternative. At the current stage of the documentation, switching to the Preservation Alternative may incur additional design and engineering fees ~~in the~~ ranging from \$250,000 to the \$450,000 included in the Cummings cost estimate. In general, the other soft costs are anticipated to be similar for both the project and the Preservation Alternative.

The cost difference between the Cumming and O'Halloran estimates is in part the difference in final products anticipated. The proposed project would not be able to precisely duplicate the original building and many of its details would be based on modern construction specifications that relate to the modern materials and compositions being used in the proposed project, such as details for the decorative entry surrounds, windows openings and cornices. The areas of intended preservation may be less successful in the proposed project for example in terms of the number of rehabilitated window units due to the extra handling and the process to re-insert the original frame into a newly built simulation that may not precisely match dimensions for each window opening.

In summary, there is a difference of opinion between experts with respect to costs and time to construct that could be required for the Preservation Alternative as compared to the project as proposed. The subjects of these differences (time and costs) are considerations in whether the applicant can reasonably feasibly implement the Preservation Alternative. The Project Architect believes, based on his professional judgment, that the Preservation Alternative would take longer to construct than the project as proposed. As discussed in detail above and presented in Appendices C.1 and C.2 the Project Architect and his cost estimator (Cumming) believe, based on their professional judgment, that the Preservation Alternative would cost more than the project as proposed. The peer reviewers (KCK and O'Halloran) believe that costs would not be as great as anticipated by the Project Architect and Cumming, although costs are still anticipated to be substantially more than the project as proposed. The peer reviewers believe, again based on their professional judgment, that construction time would not be substantially greater for the Preservation Alternative. CEQA Section 15151 indicates that, "[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement

among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

This alternative is currently under consideration by the College. As noted above, upon further exploration of costs, design issues and after conversations with the Los Angeles Conservancy, Occidental College has decided to proceed with the Preservation Alternative outlined above (it is now the preferred alternative) despite the potential for added costs and time. As discussed above, this alternative would comply with the *Secretary of the Interior's Standards for Rehabilitation* and would therefore have no significant environmental impacts on historic resources.