APPENDIX A

HISTORIC RESOURCE TECHNICAL REPORT ADDENDA
INTRODUCTION
This Historic Resource Technical Report Addendum was prepared at the request of Design Community & Environment (DC&E), for the Berkeley South Branch Library at 1901 Russell Street in Berkeley, California. The addendum is a response to comments on the “Berkeley Branch Libraries Program Draft EIR,” and specifically addresses one letter of comments by Todd Jersey Architecture, dated 30 January 2011.

The Berkeley South Branch Library is a modern neighborhood branch library constructed in 1961. The building was designed by Bay Area architect John Hans Ostwald. In 1974, a meeting room addition, also designed by Ostwald’s firm, was constructed. The tool lending library, not designed by Ostwald or Ostwald’s firm, was constructed in 1991.

The proposed project is part of the Branch Library Improvement Program that began in 2009 as a result of the passage of Bond Measure FF in November 2008. The proposed project would involve demolition of the existing Berkeley South Branch Library, and the construction and operation of a new 8,656-square-foot library on the same site. The proposed project was previously analyzed in the “Berkeley Branch Libraries Program Draft EIR,” and was determined to cause a significant adverse impact to a historic resource under CEQA.

This report provides an evaluation of a proposed “Partial Preservation” Project Alternative by Todd Jersey Architecture under the provisions of CEQA. The Project Alternative seeks to reduce or avoid the significant adverse impacts to the qualified historic resource. Additional information about the history and significance of the building can be found in the “Berkeley South Branch Library Historic Resource Technical Report,” prepared by Page & Turnbull in October 2010.

EVALUATION OF PROJECT SPECIFIC IMPACTS
This section will analyze the project-specific impacts of the Partial Preservation Alternative on the environment, as required by CEQA.

STATUS OF EXISTING BUILDING AS AN HISTORIC RESOURCE
A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a). The four categories are:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the
Historic Resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a) is considered to be a historical resource unless “the preponderance of evidence demonstrates” that the resource is not historically or culturally significant.1

Therefore, the Berkeley South Branch Library, which appears eligible to the California Register, under the first of the categories listed above, is a qualified historic resource under CEQA.

**Determination of Significant Adverse Change Under CEQA**

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.”2 Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”3 The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance” and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.4 Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

**PARTIAL PRESERVATION ALTERNATIVE**

**Description**

According to the letter addressed to Aaron Sage of the City of Berkeley Planning Dept. titled “Re: Draft Outline Rebuttal to Draft EIR of Berkeley Branch Libraries (West and South)” by Todd Jersey (30 January 2011), the Partial Preservation Alternative would involve preservation of the Main Reading Room and Children’s Reading Room at the Berkeley South Branch Library while demolishing the remainder of the 1974 addition. A new, two-story addition will be constructed in its place.

Further, the Alternative includes the following:

- Insert an additional entrance off Martin Luther King, Jr. Way between existing Children’s Reading Room and the new north addition.
- Place the Meeting Room in the original Children’s Reading Room at the southwest corner of the building to provide better presence and access by the public. Also, place bathrooms near the Martin Luther King, Jr. Way entrance so the Meeting Room can be closed off to the library but still have access to the restrooms.

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1 Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.
2 CEQA Guidelines subsection 15064.5(b).
3 CEQA Guidelines subsection 15064.5(b)(1).
4 CEQA Guidelines subsection 15064.5(b)(2).
- Create additional interior ceiling height in the new spaces
- Create additional interior height in the original Children’s Room (new Meeting Room) by creating a hip roof similar to the Adult Reading Room.
- Create a partial second floor for long term storage for tools, books, etc.; a lounge with privacy for staff; mechanical; and IT space. A limited use elevator to be installed to access the second floor.

At this stage of the design, several aspects of this proposed Partial Preservation Alternative are inconclusive, including the specific method of seismic strengthening, and style and materials of the addition. It is assumed that the seismic strengthening will be conducted through a method similar to that proposed in the Alternatives section of the DEIR. However, sufficient information in the project description exists to analyze Todd Jersey Architecture’s Alternative according to the Secretary of the Interior’s Standards for Rehabilitation.

Secretary of the Interior’s Standards Analysis

The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary’s Standards) provide guidance for working with historic properties. The Secretary’s Standards are used by Federal agencies and local government bodies across the country (including the Berkeley Landmarks Preservation Commission) to evaluate proposed rehabilitative work on historic properties. The Secretary’s Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Compliance with the Secretary’s Standards does not determine whether a project would cause a substantial adverse change in the significance of an historic resource. Rather, projects that comply with the Secretary’s Standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant adverse impact on an historic resource. Projects that do not comply with the Secretary’s Standards may or may not cause a substantial adverse change in the significance of an historic resource.

The Secretary’s Standards offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

**Preservation:** The Standards for Preservation “require retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.”

**Rehabilitation:** The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing new uses while retaining the building’s historic character.”

**Restoration:** The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

**Reconstruction:** The Standards for Reconstruction “establish a limited framework for re-creating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”

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Typically, one set of standards is chosen for a project based on the project scope. In this case, the proposed Partial Preservation Alternative scope includes altering the Berkeley South Branch Library to meet the evolving use of the building while retaining its character-defining features. Therefore, the Standards for Rehabilitation should be applied.

**Standards for Rehabilitation**

The following analysis applies each of the Standards for Rehabilitation to the proposed Partial Preservation Alternative for the Berkeley South Branch Library. This analysis is based upon design documents dated 31 January 2011, prepared by Todd Jersey Architects, and included as an attachment to this report.

**Rehabilitation Standard 1:** *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

The proposed Partial Preservation Alternative retains the Berkeley South Branch Library’s historic use as a public branch library.

As designed, the proposed Partial Preservation Alternative is in compliance with Rehabilitation Standard 1.

**Rehabilitation Standard 2:** *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

As proposed, the project will not sufficiently preserve the historic character of the property. Many of the character-defining materials and features will be retained, including the rectangular plan with Main Reading Room pavilion and its shallow sloped pyramidal roof, exaggerated overhangs, original concrete block walls, wood slat ceiling with central skylight in the Reading Room, and original decorative details including exposed cells of concrete blocks. It is inconclusive whether original windows would be preserved, or if new windows will be inserted into original openings.

However, character-defining features affected by this scheme include: the planar massing, since the building will be converted from a low, residential-feeling one-story building to two stories at the rear; the contrasting flat roof over the present Children’s Room (future Meeting Room) will be altered to a pyramidal roof to match that of the present Main Reading Room; and the wood slat ceiling and skylight in the present Meeting Room, which will be demolished to make way for the new addition. The outdoor courtyard will also be demolished. Thus, distinctive materials, spaces, and spatial relationships that characterize the property will be removed.

As designed, the proposed Partial Preservation Alternative is not in compliance with Rehabilitation Standard 2.

**Rehabilitation Standard 3:** *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

The proposed interior alterations and two-story addition will be designed with “commercial quality construction and materials,” though it is inconclusive at this stage of the design whether an
architectural style, materials, and connections would specifically be used that would remain
distinguishable from the historic portion of the Berkeley South Branch Library. However, by
repeating the form of the original pyramidal roof from the Main Reading Room above the Children’s
Room (new Meeting Room), this alteration appears to create a false sense of historical development.

As designed, the proposed Partial Preservation Alternative will not be in compliance with
Rehabilitation Standard 3.

**Rehabilitation Standard 4:** Changes to a property that have acquired significance in their own right will be
retained and preserved.

The 1974 addition, which is compatible with the original building and designed by Hans Ostwald’s
architecture firm, has gathered significance in its own right because it contributes to the overall
design and character of the building. The 1974 addition will be demolished to make way for a new
rear addition.

As designed, the proposed Partial Preservation Alternative will not be in compliance with
Rehabilitation Standard 4.

**Rehabilitation Standard 5:** Distinctive materials, features, finishes and construction techniques or examples of
craftsmanship that characterize a property will be preserved.

The central skylight and shiplap wood ceiling surround in the present Meeting Room will be
demolished, though the ceiling will be retained in the present Main Reading Room. The original flat
roof with a series of custom round light fixtures will also be demolished in the present Children’s
Room. It is inconclusive from the project description whether the original window materials will be
preserved. The collective effect of the removal of original material adversely impacts the historic
character and integrity of the building.

As designed, the proposed Partial Preservation Alternative will not be in compliance with
Rehabilitation Standard 5.

**Rehabilitation Standard 6:** Deteriorated historic features will be repaired rather than replaced. Where the severity
of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture,
and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical
evidence.

Deteriorated historic features include the roof, which suffers from rot. According to the proposed
Partial Preservation Alternative, the roof will be repaired by using steel beams for overhangs and
replacing sagging wood members in-kind. Seismic bracing and shotcrete will also have to be inserted
into original parts of the building. These upgrades and replacement of materials will likely affect
character-defining features and materials if they visibly cover the wood slat ceiling, high clerestory
windows or decorative block walls in the Main Reading Room or replace sections of concrete block
wall or eave overhangs.

As designed, the proposed Partial Preservation Alternative will not be in compliance with
Rehabilitation Standard 6.
Rehabilitation Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed Partial Preservation Alternative, as currently designed, does not include any chemical or physical treatments to the Berkeley South Branch Library.

As designed, the proposed Partial Preservation Alternative will be in compliance with Rehabilitation Standard 7.

Rehabilitation Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.

The proposed Partial Preservation Alternative does not include any major excavation, and no archaeological resources are expected to be encountered. If any archaeological material should be encountered during this project, construction will be halted and proper mitigation undertaken.

If the proposed Partial Preservation Alternative follows the guidelines outlined above, it will be in compliance with Rehabilitation Standard 8.

Rehabilitation Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, sizes, scale and proportion, and massing to protect the integrity of the property and environment.

Preservation of both the present Main Reading Room and Children’s Room walls and some roof will likely retain more than 50% of the building and not qualify as demolition under Berkeley Municipal Code 23F.04.010. Nevertheless, the proposed Partial Preservation Alternative includes demolition of the 1974 addition, which will alter the exterior of the building. Furthermore, the roof of the present Children’s Room will be converted to a pyramidal roof, which will affect the historic planar character of that wing.

A new two-story addition will be constructed behind the preserved sections. The new work will be differentiated from the old via modern commercial-grade materials. In an effort to pay deference to the original building, the addition will be set back behind the original and attached by one-story connectors. The massing of the building as a whole will change, but this is necessary in order to house all of the library’s programmatic needs. While many of the alterations will protect aspects of integrity, the partial demolition and new roof over the Children’s Room will destroy historic materials, features and spatial relationships.

As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 9.

Rehabilitation Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed Partial Preservation Alternative includes demolition of the 1974 addition, which contributes to the building’s significance, and construction of a two-story addition behind the remaining original sections. If the addition were removed in the future, the essential form and
integrity of the building and its environment would be impaired because a large section of the building and its functions would be removed.

As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 10.

**Standards Summary**

The proposed Partial Preservation Alternative does not comply with Rehabilitation Standards 2, 3, 4, 5, 6, 9 and 10 because it requires the removal of historic fabric in the original 1961 building and the 1974 addition. It also alters the property's significant spatial relationships and features. Therefore, as currently designed, the project does not appear to be in compliance with the Secretary of the Interior's Standards for Rehabilitation.

**Analysis of Project Specific Impacts Under CEQA**

Provided below is an analysis of the proposed Partial Preservation Alternative’s potential impacts to historic architectural resources in terms of CEQA criteria (determination of significant adverse impact).

**Impact 1.0 – The proposed Partial Preservation Alternative would partially demolish the Berkeley South Branch Library building, which is a qualified historic resource, and materially alter several character-defining features. (Significant)**

As the above analysis demonstrates, the proposed Partial Preservation Alternative as currently designed does not appear to be in compliance with the Secretary of the Interior's Standards for Rehabilitation, and would affect the eligibility of the Berkeley South Branch Library for listing in the California Register. The proposed Partial Preservation Alternative would partially demolish the Berkeley South Branch Library building, which is a qualified historic resource for the purposes of CEQA. Some character-defining features would also be removed or altered as part of the project. The partial demolition and alterations would be considered a significant adverse impact, since it would materially alter in an adverse manner those physical characteristics of the Berkeley South Branch Library that convey its historical significance and that justify its eligibility for inclusion in the State and local registers. Therefore, there would be a significant impact caused by a substantial adverse change to a historic resource.

Mitigation measures such as those proposed in the Historic Resource Technical Report (HABS documentation, salvage program, and interpretive program) would help convey the significance of the Berkeley South Branch Library, and would reduce the impact of the proposed Partial Preservation Alternative. However, the proposed Partial Preservation Alternative demolishes character-defining features of an historic resource and the mitigation measures are insufficient to avoid a substantial adverse change in the resource. Even with mitigation, the library would no longer be eligible for listing in the California Register, and the impact to historic resources could not be reduced to a less-than-significant level. Therefore, this impact would remain significant and unavoidable.
INTRODUCTION
This Historic Resource Technical Report Addendum was prepared at the request of Design Community & Environment (DC&E), for the Berkeley West Branch Library at 1125 University Avenue in Berkeley, California. The addendum is a response to comments on the “Berkeley Branch Libraries Program Draft EIR,” and specifically addresses one letter of comments by Todd Jersey Architecture, dated 30 January 2011.

The Berkeley West Branch Library is a neighborhood branch library constructed in 1923. The building was designed by Bay Area architect William K. Bartges. In 1974, a substantial addition designed by architect Ratcliff-Slama-Cadwalader was constructed. The 1923 portion of the building was designated a City of Berkeley Structure of Merit on May 5, 2003.

The proposed project is part of the Branch Library Improvement Program that began in 2009 as a result of the passage of Bond Measure FF in November 2008. The proposed project would involve demolition of the existing Berkeley West Branch Library, and the construction and operation of a new two-story building with a total floor area of 9,600 gross square feet and a building footprint of 8,900 square feet on the same site. The proposed project was previously analyzed in the “Berkeley Branch Libraries Program Draft EIR” and was determined to cause a significant adverse impact to a historic resource under CEQA.

This report provides an evaluation of a proposed “Partial Preservation” Project Alternative by Todd Jersey Architecture under the provisions of CEQA. The Project Alternative seeks to reduce or avoid the significant adverse impacts to the qualified historic resource. Additional information about the history and significance of the building can be found in the “Berkeley West Branch Library Historic Resource Technical Report,” prepared by Page & Turnbull in December 2010.

EVALUATION OF PROJECT SPECIFIC IMPACTS
This section will analyze the project-specific impacts of the proposed Partial Preservation Alternative on the environment, as required by CEQA.

STATUS OF EXISTING BUILDING AS AN HISTORIC RESOURCE
A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a). The four categories are:

• A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

• A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

• Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally,
a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a) is considered to be a historical resource unless “the preponderance of evidence demonstrates” that the resource is not historically or culturally significant.”

Therefore, the Berkeley West Branch Library, which has been designated a City of Berkeley Structure of Merit, under the second of the categories listed above, is a qualified historic resource under CEQA.

**Determination of Significant Adverse Change Under CEQA**

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.” Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.” The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance” and that justify or account for its inclusion in, or eligibility for inclusion in a local register of historical resources pursuant to local ordinance or resolution. Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

**PARTIAL PRESERVATION ALTERNATIVE**

**Description**

According to the letter addressed to Aaron Sage of the City of Berkeley Planning Dept. titled “Re: Draft Outline Rebuttal to Draft EIR of Berkeley Branch Libraries (West and South)” by Todd Jersey (30 January 2011), the Partial Preservation Alternative would involve moving and restoring the original portion of the library, and constructing a new two-story addition at the rear.

Further, the Alternative includes the following:

- Restore the original library as the Adult Reading Room and restore the original skylight.
- Restore the original façade.
- Move the original 1923 building to a location 2 feet north of the current sidewalk and closer to the east property line to increase its civic presence on University Avenue and make room for expanded program space to the west and behind the original building.

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1 Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.
2 CEQA Guidelines subsection 15064.5(b).
3 CEQA Guidelines subsection 15064.5(b)(1).
4 CEQA Guidelines subsection 15064.5(b)(2).
• Seismically upgrade the original 1923 building.
• Create a new entry courtyard on the west side of the original building with stairs, bike parking, and an ADA ramp (this will be the only exterior entrance)
• Build a two-story addition. Place the library program on the ground floor and the literacy spaces (such as the Berkeley Reads Program), meeting spaces, mechanical room and long term storage on the second floor.
• The ground floor of the addition will include a new round-shaped Children’s Room
• The addition will be constructed with commercial quality construction materials and systems

The general principles in this proposed Partial Preservation Alternative are in keeping with Partial Preservation Alternative 1 in the DEIR; the differences are primarily found in the locations of programmatic uses of the interior spaces.

At this stage of the design, several aspects of this proposed Partial Preservation Alternative are inconclusive, including specific method of seismic strengthening, and style and materials of the addition. It is assumed that the seismic strengthening will be conducted through a method similar to that proposed in the Alternatives section of the DEIR. However, sufficient information in the project description exists to analyze Todd Jersey Architecture’s Proposed Project Alternative according to the Secretary of the Interior’s Standards for Rehabilitation.

Secretary of the Interior’s Standards Analysis
The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary’s Standards) provide guidance for working with historic properties. The Secretary’s Standards are used by Federal agencies and local government bodies across the country (including the Berkeley Landmarks Preservation Commission) to evaluate proposed rehabilitative work on historic properties. The Secretary’s Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Compliance with the Secretary’s Standards does not determine whether a project would cause a substantial adverse change in the significance of an historic resource. Rather, projects that comply with the Secretary’s Standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant adverse impact on an historic resource. Projects that do not comply with the Secretary’s Standards may or may not cause a substantial adverse change in the significance of an historic resource.

The Secretary’s Standards offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

**Preservation:** The Standards for Preservation “require retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.”

**Rehabilitation:** The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing new uses while retaining the building’s historic character.”

**Restoration:** The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”
Reconstruction: The Standards for Reconstruction “establish a limited framework for re-creating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”

Typically, one set of standards is chosen for a project based on the project scope. In this case, the proposed Partial Preservation Alternative scope includes altering the Berkeley West Branch Library to meet the evolving use of the building while retaining its character-defining features. Therefore, the Standards for Rehabilitation should be applied.

Standards for Rehabilitation
The following analysis applies each of the Standards for Rehabilitation to the proposed Partial Preservation Alternative for the Berkeley West Branch Library. This analysis is based upon design documents dated 31 January 2011, prepared by Todd Jersey Architects, and included as an attachment to this report.

Rehabilitation Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

The proposed Partial Preservation Alternative retains the Berkeley West Branch Library’s historic use as a public branch library.

As designed, the proposed Partial Preservation Alternative is in compliance with Rehabilitation Standard 1.

Rehabilitation Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.

As proposed, the project will preserve and restore some of the primary façade of the original 1923 building and reconstruct portions that were demolished in 1974, thus maintaining its character-defining features. The existing character-defining features that would be preserved and restored include the Roman triumphal arched entry with semi-circular window and engaged columns; the surviving round ornamental medallion east of the arch; the window proportions of the three banks of windows to the east of the arched entry; the wood framed windows on the west and east facades; the cornice on the west, south, and east facades; and the remaining incised lettering from the original “West Berkeley Branch Library,” namely “-ey Branch Library.”

However, spaces and spatial relationships that characterize the property will be altered because the original building will be moved to the southeast corner of the property, thus changing the building’s relationship to the street and adjacent properties. The original entrance will be permanently sealed (the door is located 24” below the level of the interior floor, and does not satisfy accessibility requirements), while a new entrance will be constructed in the set-back addition. This will preclude the future function of the building from providing the public with the original circulatory experience of entering the reading room from the historic primary façade.

As designed, the proposed Partial Preservation Alternative is not in compliance with Rehabilitation Standard 2.

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Rehabilitation Standard 3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.

Based on the brief description for the proposed Partial Preservation Alternative, a conclusion cannot be reached as to whether false history or conjectural features will be undertaken, or whether restoration of the primary façade will be conducted based on documented evidence. The proposed interior alterations and two-story addition will be designed with “commercial quality construction and materials,” though it is inconclusive at this stage of the design whether an architectural style, materials, and connections would be used that would distinguish the addition from the historic portion of the Berkeley West Branch Library.

As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 3.

Rehabilitation Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

The 1974 addition has not gained significance in its own right, and in fact detracts from the original portion of the building. Demolishing this addition will not affect the building’s significance, which is rooted only in the original section.

As designed, the proposed Partial Preservation Alternative will be in compliance with Rehabilitation Standard 4.

Rehabilitation Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Many of the original materials, features, and finishes have already been impacted or removed by the 1974 addition, affecting the building’s historic integrity. It appears that the remaining exterior materials, features, finishes and construction techniques or examples of craftsmanship will be preserved as part of the proposed Partial Preservation Alternative.

Though not described fully in the project description, it is assumed that the seismic strengthening will be conducted similarly to the Alternatives presented in the DEIR, and the exterior finishes would be restored where beam elements are inserted into the walls. Historic wood-frame windows would be salvaged during the seismic strengthening process, while the walls are widened, and put back in place.

Furthermore, defining materials on the primary façade that were demolished in 1974 would be reconstructed with new materials, including the entry door within the Roman triumphal arched entry; the three banks of windows to the east of the arched entry (now just one window with snap mullion); the second round ornamental medallion west of the arch; the three banks of windows to the west of the arched entry; and the missing incised lettering from the original sign, namely “West Berkel-.”

However, interior plaster or other original materials will also need to be removed in order to seismically strengthen the building, and foundation materials will be replaced as part of the relocation. The collective effect of the removal of original material adversely impacts the historic character and integrity of the building.
As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 5.

**Rehabilitation Standard 6:** Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Deteriorated historic features, including the decayed substructure, wood sashes of remaining original windows, doors, and exterior finishes will be repaired. Missing features, including parts of the cornice, incised lettering, medallions, and windows, will be replaced with the use of documentary and physical evidence.

As designed, the proposed Partial Preservation Alternative will be in compliance with Rehabilitation Standard 6.

**Rehabilitation Standard 7:** Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed Partial Preservation Alternative, as currently designed, does not include any chemical or physical treatments to the Berkeley West Branch Library.

As designed, the proposed Partial Preservation Alternative will be in compliance with Rehabilitation Standard 7.

**Rehabilitation Standard 8:** Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.

The proposed Partial Preservation Alternative does not include any major excavation, and no archaeological resources are expected to be encountered. If any archaeological material should be encountered during this project, construction will be halted and proper mitigation undertaken.

If the proposed Partial Preservation Alternative follows the guidelines outlined above, it will be in compliance with Rehabilitation Standard 8.

**Rehabilitation Standard 9:** New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and environment.

The proposed Partial Preservation Alternative demolishes over 50% of the building, thus classifying it as demolition under the Berkeley Municipal Code Section 23F.04.010. Although the portions to be demolished are secondary in importance to the library’s primary façade, alterations and construction of the new addition will still result in the loss of historic materials and features. Characteristic spatial relationships will be affected because the 1923 section of the building will be moved from the center of the parcel with a deep setback to very near the property line in the southeast corner.
A new two-story addition will be constructed behind and to the west of the preserved section. The new work will be differentiated from the old via contemporary commercial-grade materials. Though the addition will be set back behind the original, the two-story section will immediately abut the original one-story building. The massing of the building as a whole will change, though this is necessary in order to house all of the library’s programmatic needs. While many of the alterations will protect the character of the building, the partial demolition, relocation of the original portion of the library, and two-story addition will destroy historic features and spatial relationships.

As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 9.

**Rehabilitation Standard 10:** New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed Partial Preservation Alternative includes demolition of the 1974 addition, relocation of the original section forward and to the east on the property, and construction of a two-story addition behind the remaining original portion. If the addition were removed in the future, the essential form and integrity of the building and its environment would be impaired because the majority of the building and its functions would be removed.

As designed, the proposed Partial Preservation Alternative will not be in compliance with Rehabilitation Standard 10.

**Standards Summary**

The proposed Partial Preservation Alternative does not comply with Rehabilitation Standards 2, 5, 9 and 10 because it requires the removal of historic fabric and alters the property’s significant spatial relationships and features. Therefore, as currently designed, the project does not appear to be in compliance with the Secretary of the Interior’s Standards for Rehabilitation.

**Analysis of Project Specific Impacts Under CEQA**

Provided below is an analysis of the proposed Partial Preservation Alternative’s potential impacts to historic architectural resources in terms of CEQA criteria (determination of significant adverse impact).

**Impact 1.0 – The proposed Partial Preservation Alternative would partially demolish the Berkeley West Branch Library building, which is a qualified historic resource, and materially alter several character-defining features. (Significant)**

As the above analysis demonstrates, the proposed Partial Preservation Alternative as currently designed does not appear to be in compliance with the Secretary of the Interior’s Standards for Rehabilitation, and would very likely affect the ability of the Berkeley West Branch Library to be listed as a City of Berkeley Structure of Merit. The proposed Partial Preservation Alternative would partially demolish the Berkeley West Branch Library building, which is a qualified historic resource for the purposes of CEQA. Some historic materials and spatial relationships would also be altered as part of the project. The partial demolition and alterations would be considered a significant adverse impact, since it would materially alter in an adverse manner those physical characteristics of the Berkeley West Branch Library that convey its historical significance and that justify its eligibility for inclusion in the State and local registers. Therefore, there would be a significant impact caused by a substantial adverse change to a historic resource.
Mitigation measures such as those proposed in the Historic Resource Technical Report would help convey the significance of the Berkeley West Branch Library, and would reduce the impact of the proposed Partial Preservation Alternative. However, the proposed Partial Preservation Alternative demolishes character-defining features of an historic resource and the mitigation measures are insufficient to avoid a substantial adverse change in the resource. Even with mitigation, the library would no longer be eligible as a City of Berkeley Structure of Merit, and the impact to historic resources could not be reduced to a less-than-significant level. Therefore, this impact would remain significant and unavoidable.
APPENDIX B

MITIGATION MONITORING REPORT
Pursuant to CEQA Guidelines Section 15097, mitigation measures adopted by the Lead Agency must be monitored to ensure that they are successfully implemented. The following table comprises the mitigation measures recommended in the Final EIR for Berkeley Branch Libraries Program, the agency or department responsible for carrying them out, and the recommended method and timing for verification that they have been carried out as intended. This program, or one similar, must be adopted if the Program and Projects are approved.
### Mitigation Monitoring Program

<table>
<thead>
<tr>
<th>Mitigation Measures</th>
<th>Responsible Department/Agency</th>
<th>Method of Verification</th>
<th>Timing of Verification</th>
<th>Compliance Verification</th>
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<tbody>
<tr>
<td><strong>CULTURAL RESOURCES</strong></td>
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<td>CULTURAL-South-1a: The project sponsors shall undertake a salvage program to save and reuse the wood slat ceiling. Prior to demolition, the project sponsors shall conduct a full survey of all historic architectural elements and hire qualified salvage contractors and companies with experience in historic buildings to complete this salvage program.</td>
<td>Berkeley Public Library</td>
<td>Site Inspection by City of Berkeley Planning Department</td>
<td>During Demolition</td>
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<td>CULTURAL-South-1b: The project sponsors shall fund a permanent exhibition and interpretative program on the development of the South Berkeley Branch Library. The Berkeley South Branch Library is one of four branch libraries in the city, and the history of public library development in Berkeley shall be shared with the public through a permanent exhibition and interpretative program. Components of this mitigation program could include a kiosk containing historic photographs and plans, as well as a signage program and gallery located preferably at one of the Branch Libraries, or if not, at the Main Library. An accompanying report shall be made available at a local public institution such as the Berkeley Public Library and the California State Library. The project sponsor shall document the affected historical resource and its setting. Generally, this documentation shall be in accordance with Historic American Building Survey (HABS) Level II, which includes:</td>
<td>Berkeley Public Library</td>
<td>Submittal to the City of Berkeley Planning Department</td>
<td>HABS: Prior to demolition.</td>
<td>Exhibit: Upon occupancy.</td>
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- **Drawings**: select existing drawings, where available; should be photographed with large-format negatives or photographically reproduced on Mylar.
- **Photographs**: photographs with large-format negatives of exterior and interior views, or historic views, where available.
- **Written data**: history and description in narrative or outline format.

HABS material standards regarding reproducibility, durability, and size shall be met. Copies of the photographs and report shall be presented to repositories such as those listed above, which are invested in archiving the history of Berkeley, municipal libraries, etc.
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<td>CULTURAL-West-1a:</td>
<td>Berkeley Public Library</td>
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<td>During Demolition</td>
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<td>The project sponsors shall undertake a salvage program to save and promote reuse of the building's historically significant materials and features to the extent reasonably feasible, namely the Classical decorative elements called out in the Structure of Merit designation: the cornice, original wood framed windows, original arched entry with semi-circular window, engaged columns, ornamental medallion, and remaining incised lettering. Salvage allows for the removal of individual architectural elements for potential reuse. Salvaged elements could be reused at the project site or another project, or be given to an architectural salvage company. Salvage has the added benefit of landfill and waste diversion.</td>
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<td>CULTURAL-West-1b:</td>
<td>Berkeley Public Library</td>
<td>Submittal to the City of Berkeley Planning Department</td>
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</tr>
<tr>
<td>The project sponsors shall fund a permanent exhibition and interpretative program on the development of the West Berkeley Branch Library. The Berkeley West Branch Library is one of four branch libraries in the city, and the history of public library development in Berkeley should be shared with the public through a permanent exhibition and interpretative program. Components of this mitigation program could include a kiosk containing historic photographs and plans, as well as a signage program and gallery located preferably at one of the Branch Libraries, or if not, at the Main Library. An accompanying report shall be made available at a local public institution such as the Berkeley Public Library and the California State Library. The project sponsor shall document the affected historical resource and its setting. Generally, this documentation shall be in accordance with HABS Level II, which includes:</td>
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