



January 22, 2018

By electronic transmission

Subject: Eastline project–2100 telegraph, ER 16-011

Dear Mr. Vollman, Members of the Landmarks Preservation Advisory Board, and Planning Commissioners

Please accept these comments on the DEIR and its appendices, and to the staff reports for Landmarks Board and Planning Commission.

1. Overall, Oakland Heritage Alliance would like to express some dismay at the minimal consideration given to the historic context of the project, and at the inadequacy of the suggested mitigations to be required. We believe that the massing of this project is problematic in all proposed configurations. While we accept that the project proponent may eventually decide to build something at smaller size, such statements are too vague to mitigate what could be an enormous impact on several outstanding historic resources, such as the Paramount Theatre, the Breuner’s Building, the First Baptist Church, the former YMCA on Telegraph, nearby historic districts, and smaller-scaled buildings across Broadway and Telegraph.

Please expand the study and mitigations to include requirements to model the mass to be more compatible with the context along Broadway.

2. The historic structures evaluations (Appendix B) are deficient. Among other things, the account of First Baptist is partially erroneous (Julia Morgan was not its initial architect, for example) and gives it rather short shrift, considering its importance. The accounts of these major buildings should be more complete, and should provide reference material that supports an appropriate design approach for new construction inserted between them. The descriptions of the buildings in the 2100 block of Broadway are dismissive and incomplete. They rush to conclusions about whether the buildings are resources without thorough enough investigation of their histories and their present states. We suggest that the Weeks/Sherman-Clay building description should include more about its cultural history, such as its association with Matthew Fox and his religious organizations. For some years, Fox was a key character in a religious movement, and he has been an important player in uptown development history. And what is the story on that mosaic on the front? Who is the artist? Can and should this detailed artwork be preserved, in part or in toto? What historically important people were featured in programs in this building?

3. Provide an additional *combined* historic resource map, showing officially-designated local landmarks and ASI and API districts, but also adding highly-rated CEQA resources such as the Breuner Building, which would likely be affected by the design of the proposed structures. Impacts on historic resources have been inadequately studied.

4. Shadow studies should include all of the adjoining historic buildings and areas, such as Oakland Uptown Art and Entertainment District API, Cathedral District API, and the 25th Street Garage District

ASI, not just one window of the First Baptist Church. We are unclear as to why the apparently significant shadow on the 22nd Street plaza is considered negligible, and suggest that it should be mitigated. While it is claimed that four trees would “absorb” the shadow, an unaddressed consideration is whether the extant landscaping and people’s ability to use this small area would suffer from decreased light and increased wind. This issue isn’t addressed. In practice, afternoon use of this plaza is dependent upon its being warm enough to sit there, so sunlight and wind effects upon it affect its usability. We object to the decision to consider the impact insignificant and eschew mitigation.

5. Visual impact should generate mitigations or design guidelines which model the mass to step back from, reveal, and subordinate the new building in relation to its distinguished neighbors.

6. Timothy Pflueger’s Paramount Theatre is not only a wonderful building, but also may represent a cultural movement in its early effort to take advantage of Oakland’s great architectural treasures, and to restore it through community advocacy and fundraising. It was an early example of the adaptive reuse movement and of high-quality restoration. This legacy should be reflected in anything built near it. The current massing of the proposed development is not sensitive enough to this resource nor to how it addresses the street, is overwhelming and out of scale. Even though much larger, the proposed buildings should subordinate themselves to this key resource, an iconic part of Oakland’s architectural and social riches. If that requires modeling the mass to enclose a bit less leasable space, so be it. It is a very large site.

To quote the City of Oakland’s General Plan Land Use and Transportation Element objectives as included in the DEIR:

- Downtown development should be visually interesting, harmonize with its surrounding respecting and enhance important views in and of the downtown, respect the character, history, and pedestrian-orientation of the downtown, and contribute to an attractive skyline. (Policy D2.1 Enhancing the Downtown)
- Housing in the downtown should be safe and attractive, of high quality design, and respect the downtown’s distinct neighborhoods and its history. (Policy D10.5 Design Housing)
- Commercial development should be designed in a manner that is sensitive to surrounding residential uses. (Policy N1.5 Designing Commercial Development)

Additional work is needed for this project to conform to these goals, and to make it fit in well with its surrounding cityscape. And the DEIR must better address the development’s historic architectural context, and the methods by which such a large project can fit in elegantly, not seem like a brutal intrusion.

Sincerely,



Alison Finlay
President

