



December 24, 2003

Board of Supervisors  
Alameda County

Re: Thomas L. Berkley Square Project

Dear Supervisors:

Oakland Heritage Alliance requests that the Supervisors place a condition on all approvals of the Thomas L. Berkley Square Project, its design, and its EIR, requiring a more thorough exploration of the feasibility of the environmentally superior alternative, which would re-use the Hotel Royal for affordable housing. We urge you to require the developer to explore the possibility of working with affordable housing developers to reuse the historic building.

*We believe that the final EIR is deficient in this regard; and that it cannot and should not be approved until further study is complete.*

In view of the recent earthquake in Paso Robles, we would like to remind the Board that the Hotel Royal is not an unreinforced masonry building. It is a reinforced concrete structure and survived the Loma Prieta earthquake in 1989 with only minor cosmetic damage. It would be wasteful to throw such a substantial structure into a landfill.

The original proposal, which re-used the Hotel Royal, would meet all of the PROJECT OBJECTIVES as enumerated on pg 32 of the DEIR. In fact re-using this resource will create a project that is more "compatible with the surrounding urban environment" and "is consistent with the City's planning policies." Reuse of the hotel would provide a better transition to nearby historic buildings and make the whole development more welcome.

The Board of Supervisors should set a good example of sustainable development and encourage cities to re-cycle their existing resources and create new infill development on vacant and underutilized land.

Sincerely,

A handwritten signature in black ink, appearing to read "Naomi Schiff". The signature is written in a cursive style with a long, sweeping tail on the last letter.

Naomi Schiff  
Vice President—Preservation Action



December 4, 2003

Bruce Jensen  
Alameda County Community Development Agency  
224 West Winton Avenue, Room 111  
Hayward, CA 94544

Re: Thomas L. Berkley Square Project DEIR #2003052042

Dear Mr. Jensen,

We are commenting only upon the historic preservation and aesthetic issues of this project, and tangentially upon parking issues as they relate to these.

Overall, Oakland Heritage Alliance agrees with the assessment of the Preservation alternative "as the environmentally superior alternative." (Paragraph 6 of page 7). It would preserve the character of an important corner site at Berkley Way and San Pablo.

The eligibility for use of the State Historic Building Code and the possibility of tax credits for the reuse of the Hotel Royal should be analyzed and added to the 1st paragraph on Page 210. In addition, we believe that the owner of the current Graphic Visions business is planning or has already commenced to move his business, thus freeing this area. The Final EIR should reflect the changed situation, as it may provide more flexibility and make possible a better analysis of parking alternatives for the preservation alternative. Additional discussion of feasibility of various parking schemes is required.

The objection to the Preservation alternative expressed in the 3rd paragraph on page 210 does not make sense. Construction of parking below offices is no big problem; it's done every day. Nor should there be any need for a deep subterranean parking structure simply because the Hotel Royal is used for housing. Parking needs should be minimal at this transit-rich location and much of it could be shared; most office use would be in the day, most parking for housing is needed in the evening. If more parking is truly needed, the less historically important Graphic Visions structure could be replaced with a new building with ground floor commercial and parking above.

After some discussions with the developer, OHA has made a serious effort to explore the feasibility of providing housing uses at the Hotel Royal building. Without having pursued an extensive investigation, we would suggest that there are likely to be housing developers who would be interested in participating in an adaptive reuse of the historic hotel. OHA board member and architect Joyce Roy undertook to measure a floor in the building and to consider whether it could be reused for housing. A typical floor plan of the Hotel Royal showing possible apartment layouts is attached. This proposal reuses most of the interior partitions, which contribute seismic resistance because they are reinforced plaster walls.

No consideration of the reuse of the Oakland Post building was explored. From the standpoint of Oakland history it is as important as the Hotel Royal. The new name of 20th Street—Thomas Berkley Way—reflects that history. Surely its loss merits a much more meaningful mitigation that preserves its rich history in a form readily accessible to the public. Should the historic preservation of the Hotel Royal and the Oakland Post building not be pursued, the mitigation measures presented in this DEIR are entirely inadequate and certainly could not be accepted in present form as even partially complete. They are not serious mitigations.

For example, the demolition of the former Pardee Building to make way for the City of Oakland building now at 250 Frank Ogawa Plaza required a substantial mitigation program which included a facade improvement program, a considerable improvement to the proposed designs for the new building, retention and rehabilitation of the building now used by the East Bay Community Foundation, an agreement to provide some built facilities for the art community which had occupied it, and several other measures.

We will be happy to assist in discussing such a more substantial program of mitigations. What is suggested in this DEIR here is merely a straightforward documentation which would be required anyway, and a salvaging of building materials which may in fact generate income for the developer, rather than representing a true mitigation of any kind.

We believe that the project as proposed does not represent a good enough design to allow it to replace historic buildings on grounds of equal or superior design quality. The proposed project might well be a real detriment to the City of Oakland's attempts to improve the quality of urban design in the uptown area. We are particularly concerned about this lackluster design in its relation to other proposed uptown projects and to the significant historic buildings across San Pablo Avenue. The visual and aesthetic discussion in this DEIR is woefully inadequate. On the whole, it seems that the environmentally superior alternative is so much superior that it must be recommended, and that there should be considerable further study, including a revised section providing more options for accommodating the parking needs of the project. No doubt others will comment on the cumulative crisis in parking which is developing in downtown Oakland under the many development project pressures.

As a public entity with its own historic commission, Alameda County has a responsibility to preserve the historic fabric of its cities, not to destroy our sense of place, and to preserve the uniqueness of an interesting built environment. We look forward to working with the Supervisors, with the developer, and with the EIR firm to come up with a viable project that preserves important structures.

Thank you for the opportunity to comment.

A handwritten signature in black ink, reading "Naomi Schiff". The signature is written in a cursive, flowing style with a long, sweeping tail on the letter "f".

Naomi Schiff  
Vice President, Preservation Action

See attachment

