

# Memorandum Assessing Impacts to Historical Resources in City of Alameda Due to Proposed Housing Element and Related Zoning Amendments

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# 1 Management Summary

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The City of Alameda has completed a draft update to the Housing Element of its General Plan and a comprehensive set of zoning amendments. The purposes of the amended Housing Element include compliance with California state law, promotion of fair housing goals, ending and preventing homelessness, and compliance with the 5,353-unit Regional Housing Needs Allocation (RHNA) for the 2023-2031 Housing Element cycle. The City proposes to achieve these goals by, in part, adopting unlimited residential density in commercial districts, substantially upzoning throughout the City, and providing transit-oriented waivers to allow additional height on bus lines.

The provisions of the Housing Element, if adopted, will result in the degradation and potential outright destruction of Alameda's historic fabric. These provisions are specifically designed to bring multistory residential construction into established neighborhoods including historic districts and will change existing design review procedures to allow ministerial rather than discretionary review. These changes will result in tall residential projects being inserted into the Park Street Commercial Historic District as well as other sensitive historic districts and neighborhoods within the short to medium term. Intrusion of such large new buildings and additions into historic districts and adjacent to historic buildings will result in a significant loss of integrity of setting, feeling, and association, and thus significant adverse impact to these historical resources. These negative impacts have not been taken into account by the City. This loss of integrity violates the City's obligations under CEQA to avoid negative impacts to historical resources.

## 2 CEQA and Historical Resources

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The California Environmental Quality Act (CEQA) was passed in 1970 to establish a statewide environmental protection policy. Its primary functions are to provide decision-makers with information about potential environmental impacts of proposed projects prior to granting approval, to allow the public to comment on the impacts of such projects, and to identify alternatives/mitigations to avoid significant impacts to the environment. Historical resources are defined as one element of the environment under CEQA, and CEQA Guidelines CCR 15064.5(b) notes that “a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.” A proposed project must comply with CEQA (Public Resources Code [PRC] 21000 et seq. and the CEQA Guidelines (CCR, Title 14, Chapter 3), which determine (in part) whether a project has a significant negative impact on a historical resource (per PRC 21084.1).

Historical resources may be buildings, sites, structures, objects, or districts. A building is anything principally designed to shelter human activity such as a house, church, or post office. A structure is a functional construction distinguished from a building in that it is not designed for human shelter; examples include bridges, highways, and tunnels. Historic districts are among the most common types of historic property, but their nature is frequently not well understood.

A district is an area with a significant concentration, linkage, or continuity of buildings or structures united historically, culturally, or aesthetically by plan, history, or physical development. Historic districts therefore derive their importance from the relationship between individual components. The concentration or continuity of individual contributors within a historic district is almost always of greater significance than many of its separate component buildings and structures; i.e. a historic district is typically greater than the sum of its parts. Individual components may contribute to the significance of a district even if undistinguished when considered separately. A historic district comprises contributing resources (which add to the significance of the district as a whole) and non-contributing resources. Non-contributors to a historic district are buildings that do not add to the district’s sense of time and place or historical development or buildings that lack sufficient integrity to convey their relationship to the district’s history.

Lead agencies are required to identify potentially feasible measures or alternatives to avoid or mitigate significant adverse changes in the significance of a historical resource before such projects are approved. According to the CEQA guidelines, historical resources are:

- Listed in, or determined to be eligible for listing in, the California Register of Historical Resources (per PRC 5024.1(e));
- Included in a local register of historical resources (per PRC 5020.1(k)) or identified as significant in a historical resource survey meeting the requirements of PRC 5024.1(g); or
- Determined by a lead agency to be historically significant;
- Properties not previously listed or determined eligible for historic listing may also qualify as historical resources under CEQA; the fact that a historical resource has not been studied or listed does not mean it is ineligible according to the CEQA guidelines (CCR 15064.5(a)(4).

# California Register of Historical Resources

PRC Section 5024.1 establishes the California Register of Historical Resources (CRHR). The CRHR includes:

- 1) All California properties listed, or determined to be eligible for listing, in the National Register of Historic Places (NRHP);
- 2) State Historical Landmark No. 770 and above;
- 3) Points of historical interest which have been reviewed by the Office of Historic Preservation and recommended for CRHR listing by the State Historical Resources Commission.

The criteria for listing in the CRHR are based on those of the NRHP. A resource eligible for listing in the CRHR will be significant at the local, state, or national level under one or more of the following criteria:

- 1) Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2) Are associated with the lives of persons important in our past;
- 3) Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or
- 4) Have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily, properties are not assessed for historic eligibility until they have reached 50 years of age. In addition to meeting the age-eligibility requirement and one or more of the significance criteria listed above, an eligible historical resource will retain integrity. Integrity is the authenticity of a historical resource's identity evidenced by the survival of characteristics that existed during its period of significance. An eligible property will retain enough historic character to be recognizable as a historical resource and convey its historic significance. A building, structure, or district that is age-eligible (50 years or older) and significant under one or more of the above criteria will not be eligible for historic listing if its historic integrity is lost.

There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Location is the place where a historical resource was constructed. Integrity of design depends upon the combination of elements which create the form, plan, space, structure, and style of a historical resource. Integrity of setting is defined as the physical environment of a historic property and is especially crucial for historic districts. Integrity of materials is presence of the physical elements that were combined during a particular period and in a particular pattern or configuration to form a historical resource. Integrity of workmanship is physical evidence of the craftsmanship that created a historical resource. Integrity of feeling is defined as a historical resource's expression of the aesthetic sense of a particular time period resulting from the presence of physical features which together convey the historic character of the property. Integrity of association is the direct link between a historic context and a historical resource and is retained when the historic place is sufficiently intact to convey that relationship. Like feeling, association rests on the continuity of the original physical features that convey historic character. Aspects of integrity are interrelated, and loss of one aspect of integrity can degrade others (for example loss of integrity setting would have a negative impact on integrity of feeling and association).

An eligible historical resource will typically retain most of these seven aspects of integrity. Integrity is distinct from condition; a historical resource may be in poor condition but retain historic integrity

if it continues to convey its historic identity. All historic properties change over time, and a historic building or a historic district rarely retains perfect historic integrity. For a historic property to retain sufficient integrity to be eligible for historic listing, it will retain all or most of the seven aspects of integrity.

A historical resource may not retain sufficient integrity for NRHP listing but may still be eligible for the CRHR and thus qualify as a historical resource pursuant to CEQA (CCR, Title 14, Section 4852(c)).

## **Impacts to Historical Resources**

As discussed above, CEQA stipulates that a project that causes a substantial adverse change in the significance of a historical resource may result in a significant effect on the environment. Substantial adverse change to the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or of its immediate surroundings such that its significance is impaired (CCR 15064.5 (b)(1)). (CCR 15064.5 (b)(1) further states that a project materially impairs the significance of a historical resource when it:

- A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

## **Historic Preservation in the City of Alameda**

The City of Alameda has the responsibility to act as a lead agency under CEQA. Incorporated in 1872, Alameda has about 10,000 buildings constructed before 1930. Much of this historic-era built environment is architecturally and/or historically significant. In 1975, the City established the Historical Advisory Commission to assist with the City's preservation program and a Historical Preservation Ordinance established procedures for identification and designation of historical resources. The City of Alameda Historic Resources Inventory (HRI) consists of its Historic Monument List, Historic Buildings Study List and its Historic Signs. Of the thirty properties on the City of Alameda Historic Monument List, eleven are listed on the NRHP and the CRHR, twelve appear eligible for the NRHP through survey evaluation, two have been determined eligible for the NRHP and listed on the CRHR, one is a historic district contributor, and one is a California State Historical Landmark. Roughly 4,000 properties are entered on the City of Alameda's Historical Building Study List; properties listed on a local historic register are considered historical resources pursuant to CEQA (unless the

preponderance of evidence indicates that they fail to meet eligibility criteria). Until 2021, the City considered all properties on the Historical Building Study List to be listed on its historic register for CEQA purposes. However, in 2021 the City Council passed a resolution declaring that the Historical Building Study List was not part of its local historic register. The City does not appear to have undertaken a process to have these properties evaluated by a professionally qualified Architectural Historian, so despite this declaration, these properties still qualify as historical resources pursuant to CEQA. Many of the roughly 6000 properties that were constructed before 1942 but have not been added to the Historical Building Study List may also qualify as historical resources pursuant to CEQA. However, under CEQA the end of the historic period shifts each year rather than being permanently fixed at a specific date in the past; in 2022, the historic period extends to 1972 because any property over 50 years old is eligible for consideration as a historical resource. It is indisputable that some properties built between 1942 and 1972 also meet the eligibility requirements to qualify as historical resources under CEQA, although without a comprehensive historic survey their numbers cannot be estimated.

### **Historic Preservation Ordinance**

Local historic preservation regulations are codified in Article VII of the Alameda Municipal Code. Its stated purpose is:

to promote the educational, cultural, and economic welfare of the City by preserving and protecting historical structures, sites, parks, landscaping, streets, and neighborhoods which serve as visible reminders of the history and cultural heritage of the City, State or Nation.

Further goals include strengthening the local economy by stabilizing and improving property values in historic areas and encouraging harmonious new development.

The Ordinance empowers the Historical Advisory Board (HAB) to implement its regulations and to designate (and undesignate) properties as Historical Monuments. Demolition, removal, or alteration of the 30 properties on the Historical Monuments list requires a certificate of approval from the HAB (except in cases of imminent health/safety threats). Alterations and repairs to Historical Monuments must meet standards established by the HAB as well as the Secretary of the Interior's Standards for Rehabilitation (guidelines promulgated by the National Park Service to allow alteration of historic buildings while preserving character-defining features). The Ordinance also requires that all properties included in the Alameda HRI be maintained in good repair.

The Ordinance further stipulates that any building Historical Building Study List also requires a certificate of approval from the HAB prior to demolition. This protection also applies to any building constructed prior to 1942 (including buildings not listed on the Study List/HRI). However, the Ordinance provides no protection for qualified historical resources constructed between 1942 and 1972 unless they have been previously listed on the HRI. It should be further noted that alterations to historical resources not included on the Historical Monuments list are not reviewed by the HAB; nor is new construction adjacent to Historical Monuments, Historical Building Study List, or pre-1942 buildings reviewed by the HAB. HAB findings can and have been overruled by a simple majority of the City Council, and the HAB itself has sometimes approved demolition of historic buildings, so the ordinance protections are contingent rather than absolute.

### 3 City of Alameda Historic Context

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#### City of Alameda

The original occupants in the Alameda area were the Miwok and Ohlone peoples. Alameda was part of Rancho de San Antonio, granted to Don Luis Maria Peralta by the Spanish government in 1820. Tracts of the ranch were sold to European immigrants in the mid-nineteenth century as agriculture began to take hold in Alameda County. In its early years, Alameda was a busy railroad town, with a passenger railroad and ferry connecting the growing community to San Francisco. In 1869, the City of Alameda became a terminus of the transcontinental railroad. Aided by the railroad, it soon became a destination for recreation and resorts. The City of Alameda was incorporated in 1872; between 1877 and 1880, dozens of commercial buildings were constructed in the downtown area. At the time, Alameda had a population of around thirteen-hundred people.<sup>1</sup>

In 1902, Alameda was transformed from a peninsula to an island by the creation of a canal on its south end. The project had begun in 1873, when Alameda and Oakland agreed that they needed a bigger estuary to accommodate shipping and a new sewage system. The Alameda Tidal Canal allowed the northern estuary to be free for shipping while offering a solution for the stagnant waste from sewage and factories. In 1893, the Alaska Packers Association, the largest salmon packing company in the world at the time, also used the estuary for their whaling ships. By 1925, the company, which was renamed the California Packing Corporation, had established Alameda's first shipping terminal. This terminal, the Encinal Terminals, was used by the Navy for shipping supplies during World War I and II. From the 1950s to the early 2000s, Encinal Terminals was used for container shipping.<sup>2</sup>

During World War I, Alameda's shipbuilding industry was established. In 1928, Alameda's passenger airport was constructed. The construction of the San Francisco Oakland Bay Bridge in 1936 led to the end of passenger ferry and railroad service but made western Alameda County much more accessible to cars and created conditions for growth. In 1935, the United States government purchased land in Alameda for Benton Field Army Base. The Alameda Naval Air Station was opened soon after, in 1940. Alameda became known as a Navy town, and the airfield operated for fifty-six years. During World War II, the population of Alameda almost doubled due to the Naval base. The Naval Air Station became one of the largest in the world, occupying one-third of the island of Alameda and providing jobs for thousands. The Naval Air Station closed in 1997. By 2020, the City of Alameda had a diverse population of almost eighty-thousand residents. It is still an area associated with recreation and hospitality.<sup>3</sup>

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<sup>1</sup> Grant Ute and Bruce Singer, *Alameda by Rail*, United States: Arcadia, 2007; Joseph Eugene Baker, *Past and Present of Alameda County, California*, United States: S.J. Clarke, 1914, 300-330.

<sup>2</sup> Greta Dutcher and Stephen Rowland, *Alameda*, United States: Arcadia Publishing Incorporated, 2009; Nilda Rego, "Days Gone By: In 1902, 'Island City' Alameda Celebrates Its New Tidal Canal," *Mercury News*, Dec. 18, 2013; "History Timeline," Star Harbor Alameda, Accessed Oct. 24, 2022, <http://starharboralameda.com/history/>.

<sup>3</sup> "Alameda History," Alameda Museum, Accessed Oct. 19, 2022, <https://alamedamuseum.org/news-and-resources/history/>; William T. Larkins, *Alameda Naval Air Station*, United States: Arcadia Pub., 2010; "History of Alameda Naval Air Station," Alameda Naval Air Museum, Accessed Oct. 19, 2022, <http://alamedanavalairmuseum.org/history/>.

## 4 Historical Resources

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Alameda's historical resources include residential, institutional, and commercial buildings and districts; individual landmarks and contributors to historic districts were constructed between the 1850s and the middle decades of the twentieth century. These local historical resources include buildings listed for their historical significance under various historic contexts and architecturally significant buildings representing changing architectural fashions over a century. Alameda's historic fabric represents every important American architectural movement beginning in the mid-nineteenth century, including Italianate, the various Victorian-era styles, the Period Revival movements of the early twentieth century, Art Deco along with related early modern styles, and Craftsman.

Alameda's built environment is dominated by districts. As defined in Section 2, A historic district is a geographic area with significant concentration, linkage, or continuity of buildings or structures united historically, culturally, or aesthetically by plan, history, or physical development. The City of Alameda's most prominent historic district is the NRHP-listed Park Street Historic Commercial District. The City also has four local "heritage areas," Bay Station, Burbank-Portola, Leonardville, and Park Avenue. Additional neighborhoods have been identified as potential historic districts and appear to qualify as historical resources under CEQA though they have not been formally adopted by the City. At least two of these eligible local historic districts, the Park Avenue Heritage Area and the North Park Street Potential Historic District are located in close proximity to the Park Street district. Furthermore, individual landmarks such as the NRHP-listed Alameda City Hall are also located adjacent to the NRHP district. Therefore, the roughly five-block NRHP district is functionally part of a much larger area that exhibits the characteristics of a historic district (i.e. a significant concentration of contributing historic buildings). A district is important as a unified entity, although a typical district is comprised of a variety of contributing resources. Concentration, linkage, and continuity of contributing resources are essential to any historic district; a district is by its very nature greater than the sum of its parts. It is the interrelationship of individual buildings and structures within and adjacent to Alameda's historic districts that convey the visual sense of the overall historic environment.

The historic buildings and districts described in this section are a representative sample intended to provide a general understanding of the quality and diversity of local historical resources. Historic images (where available) are provided alongside contemporary photographs in order to illustrate historic integrity and continuity over time. As discussed in Section 2 above, the City of Alameda has at least 4,000 documented historical resources and a large number of historic-period buildings and structures that have never been evaluated for NRHP or CRHR significance. Many of the latter group would qualify for historic listing and would therefore qualify as historical resources under CEQA.



# Alameda City Hall

**Location:** 2263 Santa Clara Avenue (at the corner of Oak Street adjacent to Park Street Historic Commercial District)

**Year Built:** 1895-96

**Historical Resource Status Code:** 1S (individually listed on the NRHP/CRHR)

**Architectural Style:** Richardsonian Romanesque

**Architect:** George Percy

Alameda City Hall is a three-story masonry building with a hipped roof and arched windows. A flight of granite steps leads to the main entrance, which is recessed and accessed by walking through three monumental brick archways. It was designed by architect George Percy, with the firm of Percy and Hamilton, using the Alleghany County Courthouse as inspiration. It is architecturally significant and locally historically significant in the areas of politics and government, since it has served as Alameda's city hall for 127 years. The building originally had a three-story clock tower above the main façade; it was partially removed after damage in the 1906 earthquake and totally removed in 1937. City Hall was evaluated and listed on the NRHP in 1980. In 2014, the Alameda Architectural Preservation Society (AAPS) installed a City Monument Plaque, listing City Hall as Monument #1.



Figure 1: Alameda City Hall, c2022.

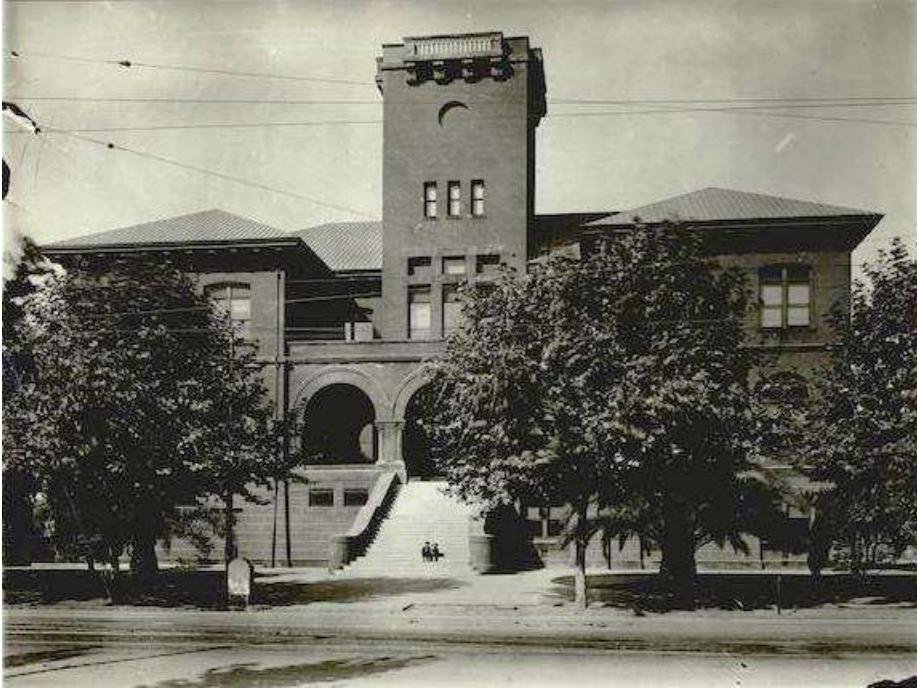


Figure 2: Alameda City Hall pre-1937 postcard showing tower, partially removed after 1906.

## Croll Building (Britt Hotel)

**Location:** 1400 Webster Street

**Year Built:** 1879

**Historical Resource Status Code:** 1CL (California State Historical Landmark and listed on the CRHR)

**Architectural Style:** Second Empire

The Croll Building is a three-story wood-frame Second Empire building with elaborate window casings, ornamental cornice with decorative brackets and frieze, and a wood-shingle mansard roof with rounded windows with heavy decorative hoods. The building also features historic storefronts on the ground floor with decorative pilasters and frieze with dentil molding. The Croll Building was built as Britt's Hotel in 1879 by Patrick Britt and purchased by John Croll in 1891. In 1908, a two-story building was moved from Croll's Gardens to Britt's Hotel and blended with the existing building. The Croll Building was one of the earliest taverns opened in the Bay Area and California. It is also historically significant because it was part of a prominent resort and amusement park in the late nineteenth century, and a place for boxers to stay and train in the early twentieth century.

The Croll Building was evaluated and listed on the NRHP in 1982. It is also a California State Historical Landmark and an Alameda Historical Monument.



Figure 3: Croll Building, west and south elevations, camera facing northeast, 2022.



Figure 4: Croll Building c1890.



# Greenleaf House

**Location:** 1724 Santa Clara Avenue

**Year Built:** 1891

**Historical Resource Status Code** 3S (appears eligible for NRHP/CRHR)

**Architectural Style:** Shingle, First Bay Tradition

**Architect:** Ernest Albert Coxhead

The Greenleaf House (Dr. Edith Meyers Center) is a two-story Shingle style building with wood shingle cladding and a complex roof form. The building is an architecturally significant work by famed English-born architect Ernest Albert Coxhead, who was known for his churches and also designed residences. Coxhead was an influential originator of American Shingle style architecture on the West Coast, known for his whimsical yet masterful approach and unique incorporation of medieval English architectural elements into the emerging style. The Greenleaf House features shingles flowing over and around surfaces to emphasize geometric forms and an oversized tower which, paired with diminutive windows, adds drama. Its plan and form are nearly identical to the Coxhead-designed Churchill House in Napa, which is a contributor to an NRHP historic district. The Alameda Girls' Club has used the house for the past forty years. The building is an Alameda Historical Monument.



Figure 5: Greenleaf House, 2022.

## **Park Street Historic Commercial District**

**Location:** Portions of six blocks roughly bounded by and Encinal Avenue, Oak St., Tilden Way, and Park Avenue

**Period of Significance:** 1880 – 1946

**Historical Resource Status Code 1D (listed as a district on the NRHP/CRHR)**

**Architectural Styles:** Art Deco, Classical Revival, Mediterranean, Romanesque Revival, Spanish Revival, Stick, Streamline Moderne, Queen Anne, and others

**Architects:** Bakewell & Brown, Andrew Hass, William Knowles, Joseph Leonard, Charles Mau, Henry H. Meyers, Percy & Hamilton, Timothy Pflueger, Bert Remmel, Edwin Symmes, and others

Evaluated in 1982, the Park Street Historic Commercial District is listed on the NRHP. The district spans three blocks of downtown Alameda. Of the seventy-two buildings in the district, most are one- or two-story buildings with ground floor storefronts. The buildings' diverse styles range from Victorian-era commercial architecture to Spanish Revival and Art Deco. The Old Masonic Temple and adjacent New Masonic Lodge are district contributors and also individually listed on the NRHP for their significant architecture; several other buildings in the district appear to have sufficient architectural significance to qualify individually for NRHP listing. In addition to the architecturally and historically significant buildings, character-defining features of the district include the traditional streetscapes with one-to two-story commercial buildings adjacent to sidewalks and sharing side walls, blocks in which a single design theme carries through a series of adjacent buildings, and the groupings of pre-1909 buildings around along Park Street intersections where historic development was stimulated by the trained minds. Park Street also has most of the local historic masonry buildings, a material that was not frequently used in Alameda. The district is historically significant as the heart of local retail commerce for 160 years and is significantly associated with successive eras of commercial development Alameda history. According to Alameda-based architectural historian Woodruff Minor, "Park Street presents the image of a traditional American "Main Street," with a wide variety of historic commercial buildings on densely built-up blocks."



Figure 6: Old Masonic Temple at 1327-33 Park Street, east and north elevations, camera facing west, Oct. 6, 2022.



Figure 7: 1327-33 Park Street, c1981, Photographed by Xandra Malandra.





Figure 8: 1335-37 Park Street, south and east elevations, camera facing northwest, Oct. 6, 2022.



Figure 9: 1336-46 Park Street, northwest elevation, camera facing southeast, Oct. 6, 2022.





Figure 10: 1349 Park Street, east elevation, camera facing west, Oct. 6, 2022.



Figure 11: 1349 Park Street, c1981, Photographed by Xandra Malandra.



Figure 12: 1500-1504 Park Street, northwest and southwest elevations, camera facing east, Oct. 6, 2022.



Figure 13: 2316-20 Santa Clara Ave, northeast and southeast elevations, camera facing west, Oct. 6, 2022.



## North Park Street Potential Historic District

North of Park Street is a potential historic residential district. This area consists mostly of the crossroads that intersect with Park Street, namely Eagle Avenue, Buena Vista Avenue, and Pacific Avenue. Many of the historic residences north of Park Street are not listed on the Built Environment Resource Directory but are being evaluated for the Historic Buildings Study List. The properties in North Park Street on the Historic Buildings Study List are 2421 Buena Vista Ave, 2437 Buena Vista Ave, 1810 Oak Street, and 2305 Buena Vista Ave.



Figure 14: 1891 Queen Anne at 2421 Buena Vista Avenue, southwest elevation, Oct. 6, 2022 (Historic Buildings Study List).



Figure 15: 1906 Shingle style house at 2437 Buena Vista Avenue, southwest elevation, Oct. 6, 2022 (Historic Buildings Study List).



Figure 16: 1620 Foley Street, northwest elevation, camera facing southeast, Oct. 6, 2022.



Figure 17: 1712 Everett Street, northwest elevation, camera facing southeast, Oct. 6, 2022.





Figure 18: 1912 Broadway, northwest elevation, camera facing southeast, Oct. 6, 2022.



Figure 19: 1885 Stick Style residence at 2323 Buena Vista Avenue, southwest elevation, camera facing northeast, Oct. 6, 2022.



Figure 20: 1891 George F. Taylor building at 2301-05 Buena Vista Avenue, northwest and southwest elevations, camera facing northeast, Oct. 6, 2022.



Figure 21: 1810-12 Oak Street, foreground (Historic Buildings Study List), 1814 Oak Street and 1818 Oak Street left frame (BERD 3S, i.e. individually eligible for the NRHP), northwest and southwest elevations, Oct. 6, 2022.





Figure 22: 1880 Alameda Buddhist Temple 2325 Pacific Avenue, northwest and southwest elevations, camera facing northeast, Oct. 6, 2022.

## 5 Proposed Housing Element Zoning Changes

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The City of Alameda has completed a draft update to the Housing Element of its General Plan (its most recent draft is labeled September 2022) and a comprehensive set of zoning amendments. The stated purposes of the amended Housing Element are:

- compliance with California state law,
- promotion of fair housing goals including equity and inclusion,
- removing barriers that make housing access difficult for low-income residents
- ending and preventing homelessness, and
- compliance with the 5,353-unit Regional Housing Needs Allocation (RHNA) for the 2023-2031 Housing Element cycle.

Although most of the proposed City of Alameda zoning changes are likely to be neutral with respect to historical resources or to result in minor to moderate effects to the integrity of local historical resources (and thus are not discussed in this report), several proposed changes will result in significant negative impacts. The following components of the Draft Housing Element are especially problematic with respect to their likelihood to cause significant negative impacts to City of Alameda historical resources such that historic integrity may be impaired:

1. Unlimited residential density (current residential density is 21.78 units/acre) and increased height limits in the Webster Street Business District from 40 feet to 60 feet, in the roughly 80% of the Park Street Business District that is not already 60 feet and from 30 feet to 45 feet in the historic small commercial districts (the “Stations”) along Lincoln, Encinal and Central Avenues.(see Program 3: Commercial Transit Corridor Zoning Amendments);
2. Proposed residential density increases in the R-3 through R-6 residential districts and the North Park Street District (see Program 4: Residential District Zoning Amendments, *Housing Density* and Program 3: Commercial Transit Corridor Zoning Amendment)
  - a. from 21.78 to 30 units per acre in R-3,
  - b. from 21.78 to 40 units per acre in R-4,
  - c. from 21.78 to 50 units per acre in R-5,
  - d. from 21.78 to 60 units per acre in R-6, and
  - e. unlimited density in the North Park Street District with height limit increases of 30 feet and 40 feet to 35 feet and 50 feet in the historic Residential and Mixed Use Subdistricts;
3. Proposed transit-oriented housing waivers in the R-1 through R-6 residential districts with unlimited density for buildings with all units 1000 square feet or less and a 40-foot height limit (increased from 30 feet and 35 feet in R-1, R-2, R-3 and R-4) within 1/4 mile of the 51 bus line and other “high-quality” bus routes (see Program 4: Transit Oriented Housing Incentives and Waivers).



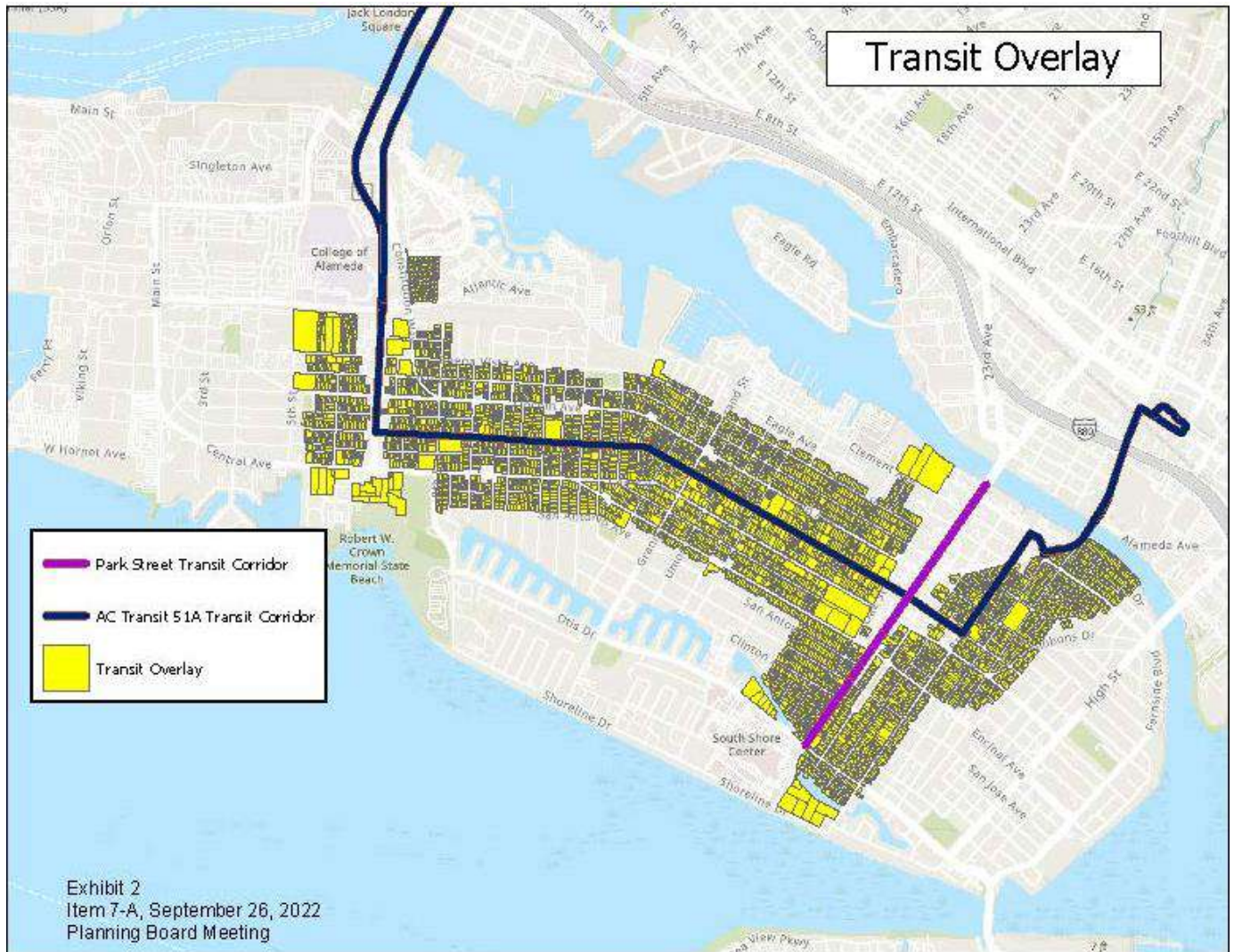


Figure 23: Transit Overlay Map, *Exhibit 2 to 9-26-22 Alameda Planning Board Housing Element staff report.*

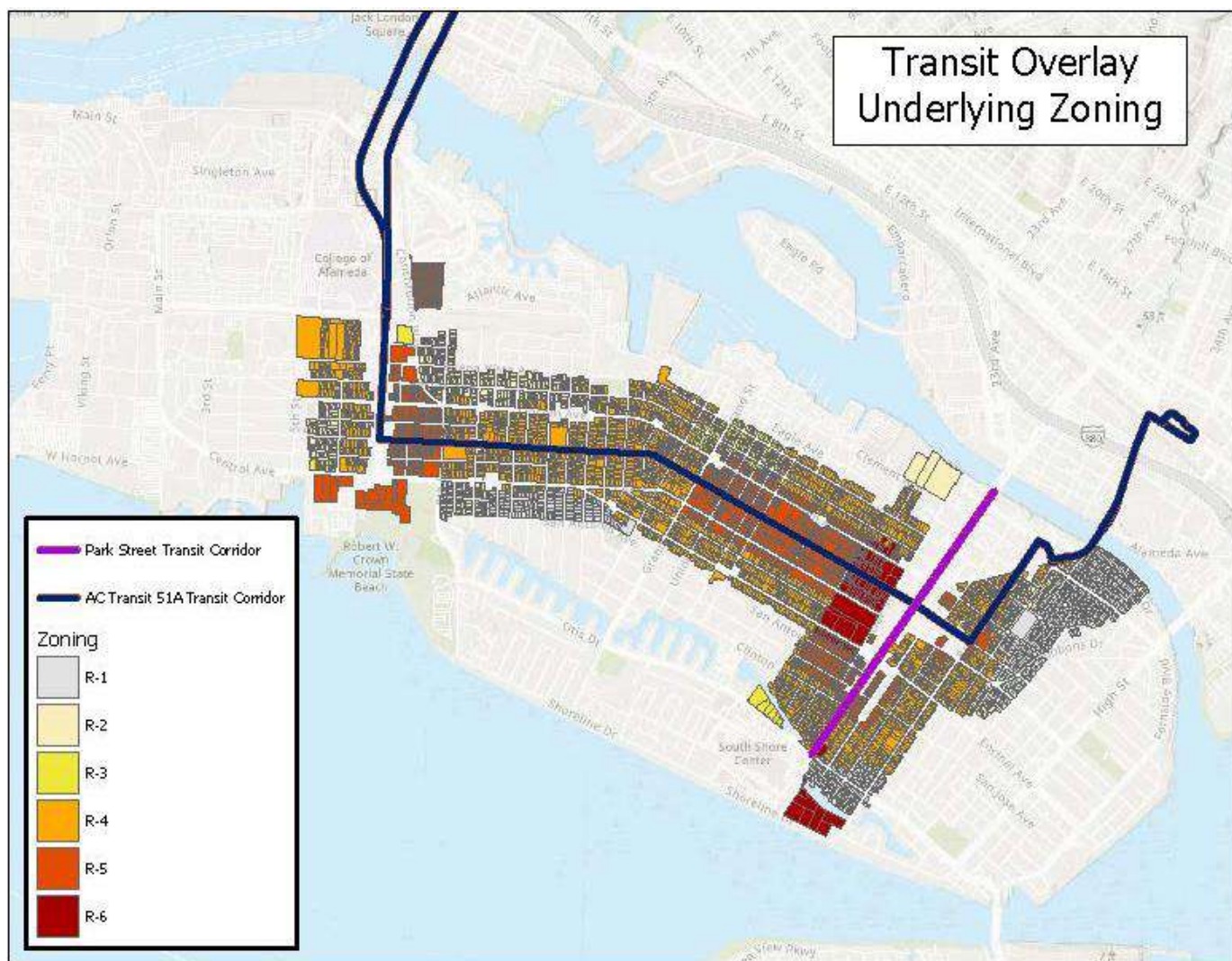


Figure 24: Transit Overlay Map with Underlying Zoning, *Exhibit 2 to 9-26-22 Alameda Planning Board Housing Element staff report.*



## 6 Negative Impacts of Proposed Changes

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The proposed changes to the Housing Element are specifically intended to encourage multifamily housing in a community that has traditionally been a mixture of single- and multi-unit residences and has a lower population density than Oakland and some other cities in the region. Modest upzoning of residential neighborhoods is likely to incrementally increase the housing stock through small projects that, for example, convert a house into a triplex. Such projects, because of their more compatible scale, can typically be designed to avoid negative impacts to historical resources. These small projects would presumably be guided by the existing Historic Preservation Ordinance and the HAB to avoid demolition or incompatible alterations to Historical Monuments. And because height and massing are usually limited for such projects, they would be unlikely to create negative indirect impacts if undertaken adjacent to historic properties. This memorandum therefore does not take issue with such changes to the Housing Element.

A foreseeable outcome of the three provisions outlined in the previous section, however, will be the construction of tall multi-unit buildings. While there are locations within the City of Alameda where careful design would undoubtedly allow development of multistory buildings without causing significant impacts to the environment, the draft Housing Element has not been well designed with respect to the protection of historical resources. Instead, height limits of 60 feet are intended to encourage the construction of large (five-to six-story) multi-unit residential or mixed-use buildings. When combined with unlimited density in commercial and some residential zones, residential density increases in the R-3 through R-6 residential zones, and state legislation such as the Density Bonus Law and SB 35<sup>4</sup>, the likely development of 80-foot buildings (up to eight stories) can be clearly forecast.

Historical resources on and in the immediate vicinity of Park Street and Webster Street, because of their proximity to transit lines, are extremely vulnerable to adverse effects from this type of development. Negative impacts to historical resources include any project activity that “materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for” listing on the CRHR or a local historic register. A project that causes a negative impact to a historical resource is a project that destroys or substantially diminishes historic integrity. As discussed in Section 2 above, to qualify as historical resource under CEQA, three elements must be present:

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<sup>4</sup> The State Density Bonus Law, among other things, requires granting developer-requested waivers to height limits and other zoning standards, resulting in larger and taller buildings than the proposed upzonings would allow by themselves, exacerbating the adverse effects of the proposed upzonings on historic areas. The State Density Bonus Law also requires allowance of a three story/33’ height increase for certain affordable housing projects within a ½ mile of a “major transit stop.” SB 35 projects must be processed ministerially and are therefore not subject to CEQA and may be combined with State Density Bonus Law projects. Although projects are not eligible for SB 35 if they are located on a site where the development “would require the demolition of a historic structure that was placed on a national, state or local historic register”, projects that involve other adverse effects on historic properties (such as intrusive new construction or incompatible additions or alterations) are still eligible for SB 35.

1. A property must be 50 (or more) years old,
2. A property must be Significant under one or more of the CRHR criteria,
3. A property must retain historic integrity.

A project, even one that completely demolishes a historical resource, does not have the potential to alter the age or significance of a historical resource, so its impact on integrity is what must be assessed. To cite a hypothetical example, if the US White House were demolished in order to construct a new presidential residence, its original construction date would remain unchanged, as would its architectural significance and its deep and long-standing historical associations with the US presidency. It would no longer qualify as a historic property, however, because its historic integrity (expressed through its location, design, setting, materials, workmanship, feeling, and association) would be irrevocably lost to demolition. In such a clear-cut case, it is obvious that the iconic features of the building's architecture would be lost, nothing would be left to convey the historic identity of the building. In this scenario, all seven aspects of integrity would be completely destroyed.

Assessment of impacts to historic properties from projects that do not demolish a historical resource (such as additions to historic buildings and infill construction within historic districts) require a more nuanced and detailed approach to assessing adverse effects on historic integrity. The local Croll Building (listed on the NRHP and as a California Historical Landmark (CHL)) provides a valuable example of how integrity is assessed for individual buildings. The property is architecturally significant for its Second Empire design as well as historically significant as one of the earliest taverns in the region and state and for its association with early twentieth century boxing. Review of its NRHP nomination and close inspection of historic and contemporary photographs reveals that it has changed substantially over time (see Figures 3 and 4); its original projecting veranda was removed at some point, a large two-story volume was connected to its north elevation in 1908, and the rear of the building was remodeled in 1980. However, an assessment of its integrity reveals that the property retains its ability to convey its historic identity as a nineteenth century tavern. It has not been moved so retains its integrity of location. Important original elements of its form, plan, and design have been retained, allowing it to convey its integrity of design, workmanship, and materials. These character-defining features include elaborate window casings, ornamental cornice with decorative brackets, friezes at the first and second story, wood-shingle mansard roof exhibiting rounded windows with heavy decorative hoods, and historic storefronts separated by decorative pilasters. The 1908 addition was constructed within the period of significance and its design details were carefully unified with the original volume of the building, thus the addition qualifies as a historic element of the building. Later changes were limited to the rear of the building which is less visible and lacks the original decorative features of street-facing elevations. The neighborhood retains some of its Victorian-period built environment along with some small scale one-story contemporary intrusions (and thus do not loom over or overwhelm the Croll Building with out of scale height and massing). Therefore, its integrity of setting has been somewhat compromised but has not been lost. With its profusion of decorative features evoking the Second Empire architectural style, it easily expresses the aesthetic sense of the 1870s. Its integrity of association is its direct link to its historic context as an early tavern since its historic features are sufficiently intact to convey that relationship. For these reasons, despite a partially compromised setting, all other aspects of integrity are present; the building thus retains historic integrity and is listed on the NRHP and as a CHL. Although a technical assessment of integrity must be performed by a historic preservation professional, this

property exemplifies the fact that most historical resources are able to convey their historic integrity to the general public. This building would be read as “historic” by any casual observer.

Assessing the historic integrity of a district is someone more difficult and complex but follows the same rules. The integrity of a historic district rests on the integrity of a majority of its components as well as the relationship between those components, which must be substantially unchanged. A historic building is an entity composed of its character-defining features (e.g. elaborate window casings, ornamental cornice with decorative brackets, wood-shingle mansard roof, etc.) which, taken together, express the historic character of the building. The unusual roof form with its decorative windows is perhaps the most dramatic character-defining feature of the Croll Building, but if its mansard roof were removed from the building, the roof on its own would not qualify as a historical resource. Nor would the Croll Building qualify as a historical resource if the mansard roof were its only remaining historic feature. Likewise, a historic district is a unified entity, and its significance is derived from the relationship between its components, rather than any single component (although many historic district contributors do qualify as individual historical resources). Because the historical resource is the entire district as a single entity with each component contributing to its importance, historic setting (the physical environment of a historic property) is especially crucial to the integrity of a historic district. A historic district will lose historic eligibility if alterations and new intrusions are so numerous that the district as an entity no longer conveys the sense of a historic environment. Physical features of the environment include nearby buildings, the layout of the street grid, features such as sidewalks and street furniture, landscape such as street trees, and the relationships between contributing buildings. Elements of the setting and the relationships between contributors must be examined not only within the boundaries of a historic district but between a district and its surroundings.

The NRHP Park Street Historic Commercial District is the historical resource most obviously at risk from the City’s proposed Housing Element. Most of the contributors to the district are historic buildings that are modest in size and scale; typically limited to one or two stories. Nearby residential historical resources, of course, have even smaller footprints with a maximum height of about 30 – 40 feet for Victorian-era houses with steeply pitched roofs, many one-story historic houses in Alameda have much lower heights. Features of the setting and the relationships between individual buildings must be examined not only within the NRHP Park Street Historic Commercial District but between the district and its surroundings. Thus, historic buildings including NRHP-listed local landmarks Alameda City Hall and Alameda Carnegie Library on the western border of the district contribute to its integrity of setting and nearby contemporary properties (such as the current CVS pharmacy building) do not contribute. For these reasons, the agency’s assessment of the negative impacts of potential projects on the district must evaluate alterations immediately adjacent to and in the vicinity of the district.

Contemplation of likely redevelopment scenarios for the CVS Pharmacy property southeast of the intersection of Oak Street and Santa Clara Avenue can serve as a valuable example to demonstrate the probability of negative impacts to historic districts and properties in Alameda. For example, a developer could propose a five-or six-story mixed-use building with 75 – 100 units on the one-acre parcel; if Government Code Section 65915(d)(2)(D) (part of the State Density Bonus Law) were applied, the City would be required to allow three additional stories, resulting in an eight-story (or perhaps even taller) building. Unit density would be unlimited, and this project would be by-right, with no discretionary permitting process. A building of this height and bulk would dwarf the historic buildings in the vicinity including NRHP-listed local landmarks Alameda City Hall and Alameda

Carnegie Library on the western corners of the intersection. The Richardsonian Romanesque City Hall and the Classical Revival library face one another across Santa Clara Avenue, creating an imposing institutional gateway to the commercial district. They are comparable in massing and plan; both are rare local examples of masonry construction and extraordinarily fine examples of their respective architectural styles. Contrasting in style and color and complementary in solemn formality, the formality of the pair proclaims Alameda's significance as a community and its collective commitment to its public life. The CVS Pharmacy parcel also touches three properties that contribute to the NRHP Park Street Historic Commercial District, the Alameda Theatre on Central Ave, the diminutive Art Deco commercial building at 1419 Park Street, and the turn-of-the-century storefront/apartment building at 2316-20 Santa Clara Avenue (Figure 13). There are ten additional contributors to the NRHP district either immediately across Santa Clara Avenue or on the same block as the parcel in question. These district contributors are all one or two stories in height and have small or modest -sized footprints.

In this case, the type of project encouraged and allowed by the draft Housing Element would not result in actual demolition of historical resources and therefore would not trigger HAB review or a certificate of approval process. However, as discussed in Section 2 above, CEQA explicitly requires assessment of impacts to the immediate surroundings of historical resources. Such an assessment would be likely to find negative impacts to the historic setting from the type of tall buildings allowed by the draft Housing Element and zoning changes, in such close proximity to so many historical resources including an NRHP-district and individual NRHP landmarks. A severe disruption to the historic setting (like the one described above) will have a significant negative impact on several aspects of integrity, including feeling and association as well as setting (discussed above). Integrity of feeling is defined as a district's expression of the aesthetic sense of a particular time period resulting from the presence of physical features which together convey the historic character of the property. Integrity of association is the direct link between a historic context and a historical resource and is retained when the historic place is sufficiently intact to convey that relationship. Like feeling, association rests on the continuity of the original physical features that convey historic character. Loss or degradation of these three aspects of integrity would create significant negative impacts to historical resources (including the historic district, the library, and city hall). However, the Housing Element institutes no process for assessing such impacts, nor is assessment of indirect impacts to historical resources currently provided for by the City's procedures or local historical resource ordinance. Current zoning regulations have, in concert with the limited protections afforded by the Historical Preservation Ordinance, in the past been sufficient to protect the integrity of Alameda's historic districts. But the massive upzonings proposed by the draft Housing Element will remove the main constraint to replacing smaller, often historic, buildings with larger buildings, thereby resulting in an increase in these district intrusions and negative impacts to integrity of setting, feeling, and association. Removing the constraints provided by the existing zoning would constitute a significant effect on historical resources in the City based on the CEQA criteria discussed above. Since no discretionary approvals would be required for the project, there would be no project level environmental review. A Housing Element environmental review would therefore be the only environmental review opportunity pursuant to the Alameda General Plan EIR's tiering protocol.

Not only do the proposed zoning changes fail to address the impacts of a single tall building in a sensitive area near a historic district, but the City has also not implemented a process to assess potential cumulative effects. Multiple simultaneous projects of similar scope and scale are likely to be undertaken within a short time after adoption of proposed zoning changes. CEQA requires that these cumulative impacts be assessed and mitigated. A twelve-block area including the example site discussed above includes at least a dozen surface parking lots as well as properties like small convenience stores on large lots that will become attractive sites for redevelopment if the draft

Housing Element is adopted. Furthermore, a project already identified in the draft Housing Element as contributing 50 residential units to Alameda's RHNA obligation proposed for the former Bank of America building at 1500-04 Park Street (Figure 12) would be enabled by the new Housing Element. It would consist of 50 residential units above ground floor commercial and apparently demolish everything except the two street facades, with a four- to five-story building behind/above the preserved façades. Despite the nominal façade preservation, details of this plan are not consistent with best practices in the Secretary of the Interior's Standards and related documents for additions to historical resources and would result in a negative impact to the integrity of the building itself and the historic setting of the district. Multiple large infill projects paired with overscaled additions to historic buildings will result in the significant degradation of the historic environment and loss of integrity for the entire NRHP district. And similar impacts will occur in other areas of Alameda outside the NRHP district, most notably to the historic section of Webster Street and the potential North Park Street Residential Historic District.

There is a near certainty that multiple projects similar in scale and scope to those described above will be developed within a small area of historic Alameda if the current Housing Element is adopted. Although a detailed and specific outcome of future development of any particular parcel cannot be foretold, planning and preparing for probable outcomes is the specific purpose of the Housing Element. A cursory review of recent in nearby communities can provide a realistic framework for what is likely to occur in Alameda. In May 2020, San Francisco Chronicle columnist John King described at least ten apartment buildings between five and fourteen stories underway in downtown Berkeley with another ten in the planning stages (mostly within a block of Shattuck Avenue). Along with completion of a sixteen-story hotel, King argued that the Berkeley building boom underway is resulting in a thorough transformation of a built environment once renowned for its low-slung buildings. By October 2022, a 250-foot, 26-story housing tower had also been proposed for downtown Berkeley. Nor is the development boom in Berkeley unique in the region. Nearby Oakland is larger and denser than Alameda, and its downtown can likely absorb the transformation of office towers to housing towers without a serious rupture to its historic fabric. But tall residential buildings planned in lower-density neighborhoods outside the urban center will be more disruptive even in a large city such as Oakland. (See Appendix A for articles discussing some of these projects and demonstrating how the State Density Bonus Law has allowed height increases of two and even three stories, such as the Oakland example at 2301 Telegraph Avenue which has a 78-foot height despite the parcel's 45-foot height limit.)

Alameda is an extremely sought-after residential enclave and there is high demand for all types of housing within the City. Even regional communities that are lower density than Alameda (Hayward, San Leandro) are seeing intensive multistory multifamily development. Although Berkeley's larger size and its University are differences between the communities that suggest Alameda will not experience a building frenzy of equal size and scale, adoption of this Housing Element will set off a transformative wave of development. Adjusting Berkeley's example to account for Alameda's somewhat smaller size and slightly lower population suggests that the zoning changes would stimulate a wave of development resulting in between five and ten multistory residential projects constructed in and adjacent to the Park Street Commercial Historic District within the short to medium-term.

The provisions of the Housing Element, if adopted, will result in the degradation and potential outright destruction of Alameda's historic fabric. These provisions are specifically designed to bring multistory residential construction into established neighborhoods and will change existing design review procedures to allow ministerial rather than the current discretionary review procedures.

These changes, as can be demonstrated by recent events in nearby communities, are virtually guaranteed to result in tall residential projects being inserted into the Park Street neighborhood (and into other sensitive historic districts and neighborhoods) within a brief period. Intrusion of such large new buildings and additions into historic districts and adjacent to historic buildings in the City will result in a significant loss of integrity of setting, feeling, and association, and thus significant adverse impact to these historical resources that has not been taken into account by the City.



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# Appendix A:

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ABOUT

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2301 TELEGRAPH AVENUE

# Approval For Community Anchor At 2301 Telegraph Avenue, Northgate, Oakland



2301 Telegraph Avenue view from 23rd Street and Telegraph, design by Mithun and Parcel Projects

BY: ANDREW NELSON 5:30 AM ON OCTOBER 21, 2022

The City of Oakland has approved plans for the seven-story proposal at [2301 Telegraph Avenue](#) in [Northgate, Oakland](#). The unique mixed-use project aims to create a



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new community anchor for the neighborhood with affordable housing, retail, offices, and a performance center. **Parcel Projects** and **McCormack Baron Salazar** are jointly responsible for the development.

The expedited approval process was in part achieved using Senate Bill 35, introduced in 2017 by State Senator Scott Weiner and approved by Governor Jerry Brown. The bill sets a standard list of requirements the project must meet to be eligible.



2301 Telegraph Avenue vertical cross-section, design by Mithun and Parcel Projects

The timeline for 2301 Telegraph started in 2015 when Parcel Projects and McCormack started engaging with neighborhoods and public meetings. The meeting with hundreds of people and 60 organizations in the city. The city first received the proposal seven months ago, in March of this year. The development permits were filed with the city just two months ago.

The 78-foot tall structure will yield 43,700 square feet, of which 4,970 square feet will be for retail. Of the 58 units, half will be dedicated to Transitional Age Youth, and one will be dedicated to an on-site manager. Apartment sizes will range from studios to one and two bedrooms. **Mithun**



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San  
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on Tops  
Out for  
Three  
Towers at  
Mission  
Rock, San  
Francisco**



and Parcel Projects will be collaborating for the architectural design.

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2301 Telegraph Avenue semi public terrace, design by Mithun and Parcel Projects



2301 Telegraph Avenue view from the second-floor terrace, design by Mithun and Parcel Projects

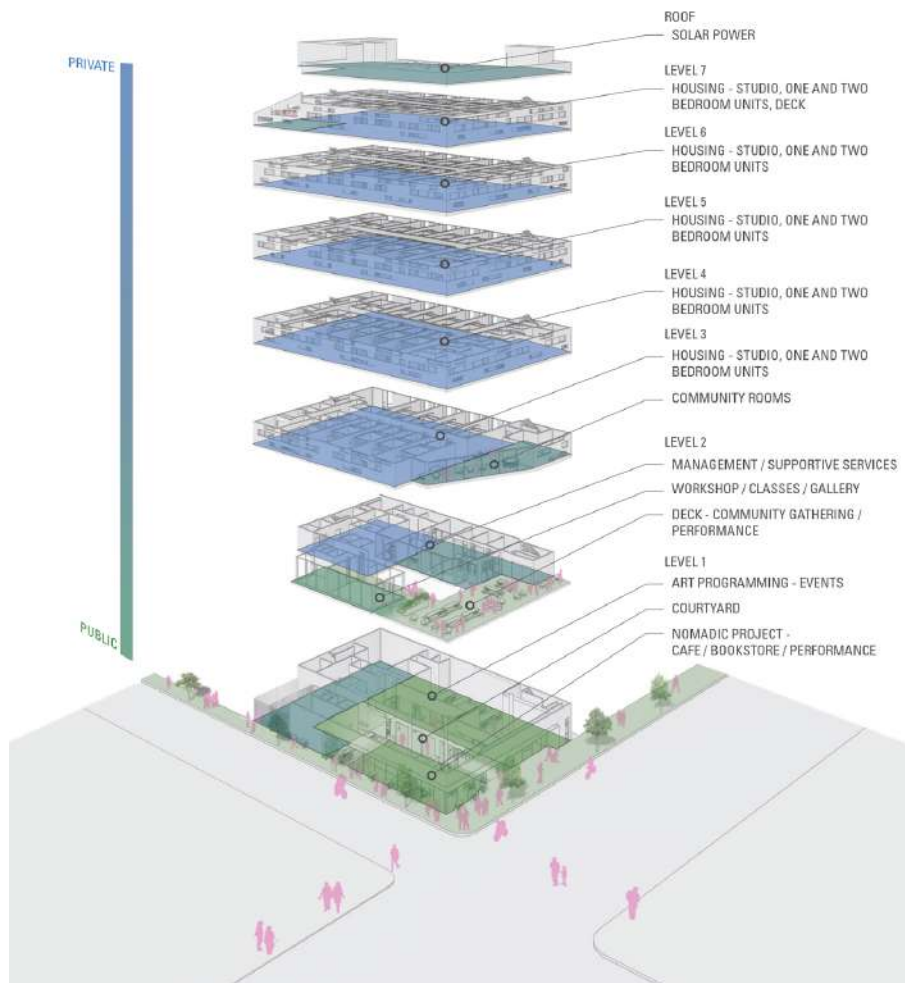
The first floor will include a cafe, bookstore, and performance center at the corner of Telegraph Avenue and 23rd Street, managed by the Nomadic Project. An art programming room will offer event space on the second half of the first floor.

The second floor will include a semi-public deck offering visitors seating with fresh air and city views. The rest of the floor will offer workshops, classes, a gallery space for arts, and offices for property management and supportive

services. The art spaces will be run by community-based arts organizations based on-site or elsewhere in Oakland.



2301 Telegraph Avenue interior view, design by Mithun and Parcel Projects



2301 Telegraph Avenue floor programming illustration, design by Mithun and Parcel Projects



2301 Telegraph Avenue evening aerial view, design by Mithun and Parcel Projects



2301 Telegraph Avenue, image via Google Street View

McCormack Baron Management, the same firm behind the 755-unit **1300 Buchanan Street** proposal in **San Francisco**, will be responsible for building management. Urban Strategies Inc. and First Place for Youth will provide supportive services for residents. Apartments will populate the rest of the building from the third level and up.

Reached for comment, Parcel Projects partner Erik Bloom shared “We are thrilled to be moving forward with the project and look forward to providing much needed affordable housing and space for community-based arts organizations in Oakland.” Bloom confirmed they are aiming to start construction in 2024, and the team is working on predevelopment and construction financing now.

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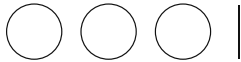
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# Berkeley has a downtown housing boom right now. It's going to transform the city's character

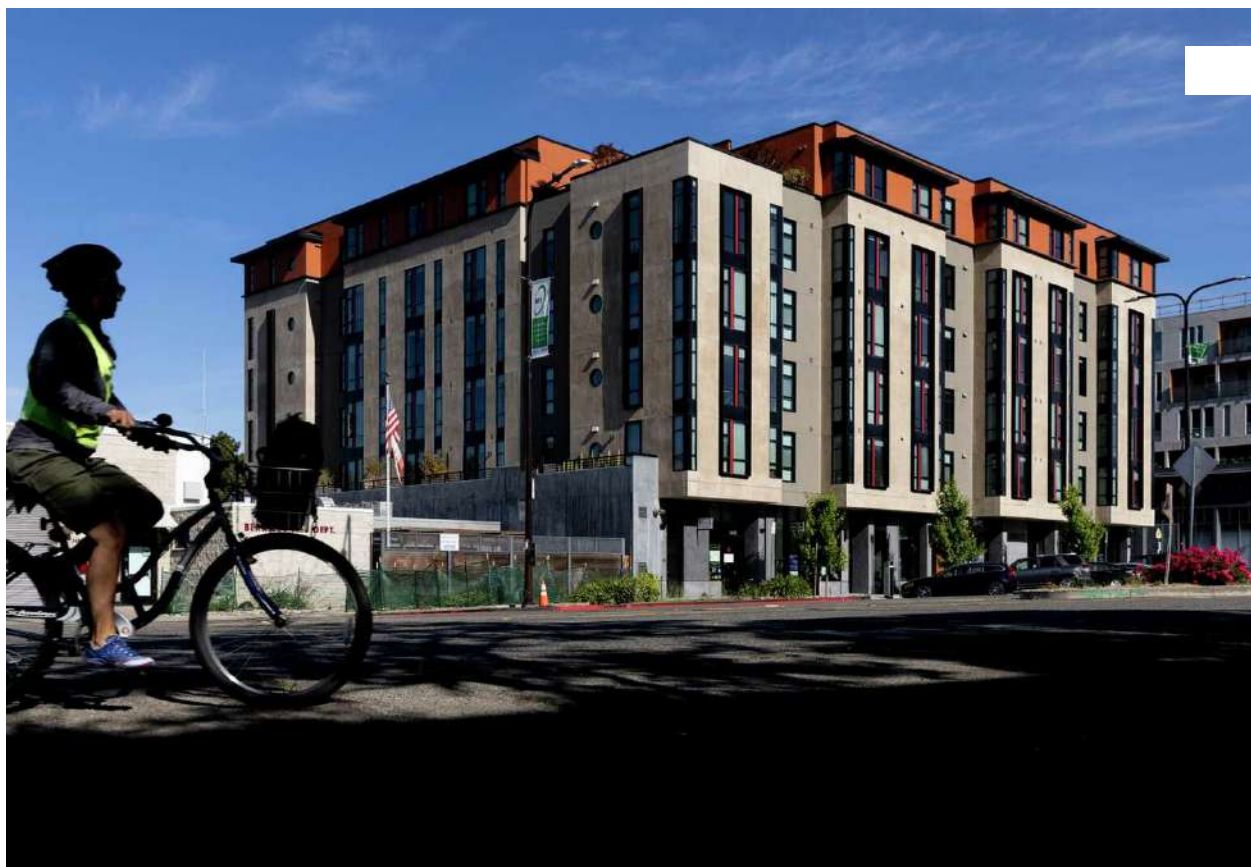


**JOHN KING**

Updated: May 31, 2022 12:42 p.m.







1 of 6



The six-story Aquatic Shattuck, which opened last summer at Carlton Street, is one of a dozen apartment buildings that have been added to downtown Berkeley or are under construction.

Photos by Santiago Mejia / The Chronicle

Visit central Berkeley and there are sights you expect to see: the Campanile rising serenely from the heart of campus. Students on the sidewalks, even after commencement. Aging men and women dressed as if it's still 1974.

And then there's the unexpected — like a downtown housing boom that shows no sign of dying down.

At least 10 apartment buildings ranging in height from five to 14 stories are under construction in downtown Berkeley, most of them within a block of the district's spine, Shattuck Avenue. An equal number are approved or under review, including a proposed 25-story housing tower that would be only 60 feet shorter than the Campanile — the city's tallest building.

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Architecturally, let's be honest: None of them will make people forget [Julia Morgan](#) or Bernard Maybeck, whose atmospheric buildings of shingled wood and thick masonry enriched the local landscape a century ago. But as downtown's character is transformed, its two newest apartment buildings are worth checking out for another all-important reason — to gauge whether the newcomers connect with their surroundings in meaningful ways, particularly where the structure meets the ground.

“The interface between a building and the sidewalk,” in the words of Berkeley architect and urban designer [Dan Parolek](#). Or, as he also puts it, “the building from the knees down.”

The latest addition is Identity Logan Park, which fills eight stories with 135 student apartments at the corner of Shattuck and Durant avenues, replacing half of a now-demolished strip mall (the rest of the site will hold the second phase). The other, Aquatic Shattuck, opened last summer several blocks to the south at Carleton Street.

The latter is a much better fit, and not because it's two stories smaller.

Identity Logan Park will line a block of Shattuck Avenue in downtown Berkeley with eight stories of new housing. The first phase (back) opened recently, and the second phase is under construction.  
Santiago Mejia/The Chronicle

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The difference starts on the ground, where the first floor notches back beneath each broad bay, a saw-tooth response to Shattuck's angled path that allows space for small patches of landscaping between the sidewalk and the building. Pulling back the ground floor from the property line also means the upper floors can extend over the sidewalk by as much as 3 feet.

All this sounds subtle, and it is, but the moves create an almost domestic tone for pedestrians along Shattuck. The building has a neighborly feel, no easy task at this scale, helped by trees that buffer the sidewalk from the street.

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The floors above offer a contemporary take on Berkeley's traditional stucco apartment buildings: The Aquatic lines up along Shattuck in four orderly bays above the strong recessed base, a vertical rhythm emphasized by black metal that frames the stacks of windows and extends out several inches from the muted tan facade.

The design by Trachtenberg Architects for developer Read Investments is subdued, no question. It also resembles five similar apartment buildings the team erected near the popular Fourth Street retail strip. En masse, things can get monotonous; here, next to a fire station built of concrete blocks, it's a sophisticated upgrade to the larger roadside scene.

How you make a squat five-story building seem more vertical? At Aquatic Shattuck in Berkeley, Trachtenberg Architects used windows framed in black metal that pop out from bays covered in tan stucco.

Santiago Mejia/The Chronicle

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Identity Logan Park, by contrast, feels arbitrary and detached.

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This one's flashier, with orange and white metal panels against a black stucco backdrop. It includes benches in a small corner plaza, a nice touch lacking at Aquatic Shattuck.

Wonder of wonder, there even are retail tenants — a sweets shop and a bank that were retained from the strip mall.

Mostly, though, the building designed by Johnson Lyman Architects for developer Austin Group sits there like a crate of housing adorned with just enough surface “architecture” to get an OK from the city.

Retail spaces line the sidewalk with ample glass, but their flat design does nothing to pull you in. Around the corner on Bancroft, the final stretch of street frontage after the parking entrance is unadorned gray concrete, as if no one was paying attention.

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The white and orange panels above were probably intended by the architects to break up the mass of the complex and add a little pizzazz. But the colored layers are so thin they look like applique; the depth hinted at in renderings is in short supply.

Quibbles aside, a colorful building at this scale fits downtown well, especially because Shattuck is a wide boulevard. With the campus two blocks to the east, and downtown's BART station a few blocks north, it's a natural place to add density and height.

There hasn't been much fuss about the downtown boom, perhaps because the Bay Area's housing crisis makes even die-hard Berkeleyites accept the need for change. There's opposition to UC's plan to build [dorms on People's Park](#), and the idea of adding dense affordable housing at the Ashby and North Berkeley BART stations, but downtown is moving forward.

If the pace of construction continues, such newcomers, in a decade, could look downright petite.

The Aquatic Shattuck on the south end of downtown Berkeley uses projecting bays and other design touches to add depth to a six-story building that is similar in scale to many being added to Bay Area cities.  
Santiago Mejia/The Chronicle

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Already, a 16-story hotel opened this spring at Shattuck and Center Street, downtown's first tower in 50 years. Grosvenor, an international developer with offices in San Francisco, has cleared a corner at Shattuck and Berkeley Way to start work on 12 stories of apartments.

Those two structures are tall for a city of 124,000 people that has only two office buildings above 150 feet. But with the leeway given developers by the state's [housing density bonus](#), which allows up to 50% extra space and height when affordable units are added to a project, the old limits could be shattered. Trachtenberg Architects has designed what, if approved, would be a 25-story stab on Shattuck next to BART. Several other sites might also be able push this high.

That's why it's important to take stock of what's coming up now. The two buildings on the south end of downtown offer pointers on how density can make an existing district more urbane — and what not to do.

Put another way: The more new buildings that come our way in the Bay Area, the more important that space below the kneecaps will be.

*John King is The San Francisco Chronicle's urban design critic. Email: [jking@sfchronicle.com](mailto:jking@sfchronicle.com) Twitter: [@johnkingsfchron](https://twitter.com/johnkingsfchron)*

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Written By  
**John King**

Reach John on

John King is The San Francisco Chronicle's urban design critic, taking stock of everything from Salesforce Tower to sea level rise and how the pandemic is redefining public space. A two-time Pulitzer Prize finalist and author of two books on San Francisco architecture, King joined The Chronicle in 1992 and covered City Hall before creating his current post. He is an honorary member of the American Society of Landscape Architects.

VIEW COMMENTS

## Appendix B: Preparer's Qualifications

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Kara Brunzell, Architectural Historian, M.A. in Public History. Ms. Brunzell has thirteen years of experience conducting architectural surveys, preparing NHPA and CEQA compliance documents, and practicing cultural resource management. Ms. Brunzell meets the Secretary of Interior's Professional Qualifications for both History and Architectural History. She holds a Master's degree in Public History and has worked in multiple facets of historic preservation and cultural resource evaluation. Her experience includes municipal preservation planning and working as the lead staff member of a non-profit preservation organization. Since 2012, she has worked full-time as a historical consultant, completing dozens of evaluations for CEQA and Section 106 compliance. Additionally, she has completed local and national register nominations, historic context statements, and Historic American Engineering Record recordation. She frequently works in the Bay Area and the greater Sacramento area and has also completed projects in Southern California, Nevada, Oregon, New York, and Puerto Rico. In addition to work with historic-period domestic, agricultural, and commercial properties for private clients, Ms. Brunzell has prepared reports on post offices, military bases, university campuses, hospitals, church properties, national parks, and a NASA site. She is listed as a Historian and Architectural Historian on the California Office of Historic Preservation's roster of qualified consultants for every county in California.



## KARA BRUNZELL

**Owner/Principal Historian (2009 – Present)**

**Brunzell Historical**

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### EXPERTISE

Kara Brunzell has practiced in the fields of history/architectural history, cultural resource management, and historic preservation since 2007. She has served as a consulting historian on historical research investigations for federal, state, and local governments. She is proficient in the recordation, inventory, and evaluation of historic resources using the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR) guidelines. Her expertise includes preparing reports and making recommendations regarding Section 106 review and compliance. Kara is experienced in applying the California Environmental Quality Act (CEQA) to both large-scale survey projects and individual historic-period resources. She has also worked in municipal preservation planning and non-profit historic preservation. Her non-profit work has included coordination of technical services, content creation and implementation for preservation education, and management of a preservation advocacy program. Kara qualifies as a historian and architectural historian under the United States Secretary of the Interior's Professional Qualification Standards (as defined in 36 CFR, Part 61).

### EDUCATION

California State University, Sacramento, MA, Public History  
UCLA, BA, History

### CONTINUING EDUCATION

HUD's Office of Environment and Energy: Historic Preservation and HUD, May 2014  
California Preservation Foundation Workshops:  
    The Environmental Benefits of Reuse, August 2011  
    Preservation Ordinances, April 2011  
    The Use and Application of the California Historical Building Code, July 2009

### SELECT PROJECT EXPERIENCE

**Architectural History Effects Investigations for Telecommunications Projects, Ace Environmental LLC, (2019-current).** Kara manages and authors determinations of effects studies for proposed cellular antenna installation and expansion projects located on historic-period buildings or within historic districts throughout California. Project impacts on historic properties are assessed in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, the Nationwide Programmatic Agreement for Colocation of Wireless Antennas, effective March 2001 and the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (March 2005) as well as subsequent relevant Report and Orders. The reports assess whether the proposed undertakings would result in direct or visual effects to historic properties. Since 2019, Kara has assessed more than one hundred telecommunications sites throughout California in Alameda, El Dorado, Los Angeles, Orange, Placer, San Bernardino, Sacramento, San Francisco, Santa Clara, Santa Cruz, San Mateo, Sonoma, Stanislaus, and Ventura counties as well as in Reno, Nevada.

**United States Postal Service, Determinations of Eligibility, Various Locations. Historian/Architectural Historian, 2012-present.** Kara has evaluated post office buildings for NRHP listing using the appropriate National Parks Service documentation forms. Kara has also re-evaluated historic post office buildings already listed in the NRHP and prepared addendums that detail exterior and interior historic character defining features when existing documentation does not include this detail. Kara has contributed to determinations of eligibility or addendums to the NRHP nominations for the following post offices:

- Berkeley Main Post Office, California
- Broadway-Manchester Post Office, Los Angeles California
- Burbank-Glen Oaks Post Office, California
- Burlingame Post Office, California
- Commonwealth Station Post Office, Fullerton, California
- Glendale Main Post Office, California
- Huntington Beach Post Office, California
- Mission Rafael Post Office, San Rafael, California
- Napa Franklin Station Post Office, California
- Red Bluff Main Post Office, California
- Redlands Post Office, California
- Richmond Post Office, California
- San Rafael Post Office, California
- Santa Barbara Main Post Office, California
- Santa Clara Post Office, California
- Santa Monica Post Office, California
- Worldway Postal Center, LAX, California
- East Hartford Post Office, Connecticut
- Lihue Main Post Office, Hawaii
- College Station Post Office, New York
- Morgan North Post Office, New York
- James A. Farley Post Office, New York
- Luis A. Ferré US Courthouse & Post Office, Ponce, Puerto Rico
- Provo Main Post Office, Utah

**NRHP District Nomination of Asilomar Conference Center, Pacific Grove, Monterey County (2020-2022).**

Kara nominated of buildings designed by noted Modernist John Carl Warnecke and constructed at Asilomar Conference Center between 1959 and 1968 to the NRHP. Asilomar was originally designed by Julia Morgan and developed between 1913 and 1928, and the Morgan buildings are listed on the NRHP as a district.

**Historic Context Statement, Richmond Grove Neighborhood, Sacramento, Sacramento County, California (2021 – 2022).**

Kara managed an intensive neighborhood historic context survey and historic district evaluation for a neighborhood within the original Sacramento street grid. About 500 residential, commercial, and institutional properties were surveyed, with over half recommended eligible as individual landmarks or contributors to a potential historic district. The neighborhood was documented on DPR 523 series forms and a detailed report nominating it as a local historic district was produced.

**Impacts Analysis, Judicial Council of California Learning Center, San Francisco Judicial Courts (2021-2022)**

The Judicial Council of California and the Supreme Court of California are planning to construct the Judicial Learning Center in the historic Earl Warren California Supreme Court Building (1926). The Earl Warren Building is a contributor to the NRHP-listed San Francisco Civic Center Historic District as well as the San Francisco Civic Center National Historic Landmark, which features some of the most important Beaux Arts architecture in the US and is widely considered one of the most completely realized examples of City

Beautiful planning. Kara provided a historic property impacts analysis pursuant to California Public Resources Code 5024.5 (which applies to state-owned buildings), photographing the project area and exterior of the historic building, meeting with stakeholders including project architects to discuss design of the project to avoid negative impacts to the historical resource, and preparing a technical impacts analysis memo.

**Historic Standards Review, Proposed Alterations to Castanada Adobe, Sonoma, California (2015 and 2021).** Kara assisted with the conversion of the NRHP-listed Castanada Adobe from residential to commercial use in 2015, reviewing architectural plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. She worked with the property owners and their architects to ensure the alteration in use would not have a negative impact on the historic integrity of the 1830s-era adobe. When alterations were planned in 2021, Kara again reviewed the project for conformance with the standards.

**Historical Evaluation of the Clark Ranch near Table Bluff, Humboldt County, California (2021).** Kara evaluated the historic-era rural-residential complex for architectural and historical significance pursuant to Section 106. The property lacked significance under the criteria and was recommended ineligible for the NRHP and CRHR.

**Historic Architectural Survey Report, Lenwood and Colton, California High-Speed Rail Authority (2019 – 2021).** Kara managed Section 106 and CEQA compliance for a stretch of the High-Speed Rail project area in San Bernardino County. Kara oversaw preparation of appropriate local and architectural historic contexts and evaluation of built-environment resources. Five properties were evaluated on DPR 523 series forms and streamlined documentation was prepared for an additional 22 properties.

**Historical Evaluation and Historic Standards Review, England Estate, Redlands, San Bernardino County, California (2019 – 2020).** Kara evaluated a historic citrus estate consisting of multiple components associated with the grove and its residential complex, most significant among them being two residential buildings, a carriage house, detached garage, and a grove barn. The property was recommended eligible for the NRHP as an excellent example of a historic citrus estate, and important local historic property type. A proposed project was assessed for impacts; the study recommended that preservation of the buildings and a small portion of the orange grove along with development of housing on the bulk of the property's acreage would not result in a negative impact to the historical resource.

**I-80/Ashby Avenue Interchange Improvement Project, Alameda County (2019).** Kara prepared an assessment of the built environment resources (a radio station and tunnel) in the project study area for inclusion in a Preliminary Environmental Assessment Report for California Department of Transportation review. She conducted a field review, recorded buildings in the project area of potential effects on California Department of Parks and Recreation 523 forms, and evaluated the recorded resources for NRHP and CRHR eligibility.

**Mitigation Documentation of the Intercoast Life Insurance Company Building, Davis, Yolo County (2019).** Kara prepared detailed documentation of an architecturally significant building in Davis as an approval condition for demolition. The Intercoast Life Insurance Company Building was a singular example of an architect-designed corporate headquarters completed in 1966, which incorporates New Formalist and Googie influences. It was an ambitious example of regionally important architect Silvio Barovetto's body of work, and represents the late period of his career, characterized by bold and audacious Modernist designs.

**California Federal Emergency Management Agency Environmental and Historic Preservation Technical Assistance, northern and southern California, 2017-2019.** Kara served as a Historian providing historic preservation compliance support for 22 projects in northern and southern California, submitted to the FEMA Region IX Hazard Mitigation Branch. Duties include recordation and evaluation of buildings and structures 45 years and older on Department of Parks and Recreation (DPR) 523 forms and State Historic

Preservation Office (SHPO) Section 106 of the National Historic Preservation Act consultation including preparation of SHPO packages. Project areas include San Bernardino, Riverside, Napa, Humboldt, Amador, and Lake Counties.

**Environmental Reviews for the Restore Louisiana Disaster Recovery Program, Louisiana, 2017 – 2018.**

Serving as a Historian/Architectural Historian for Louisiana's disaster recovery programs funded by CDBG-DR grants awarded for the unnamed storms of 2016. These reviews are being conducted for the Louisiana Office of Community Development, Disaster Recovery Unit pursuant to the HUD NEPA Regulations (24 CFR Parts 50 and 58). This process includes identification of historic properties for inclusion in the NRHP, consultation with the Louisiana State Historic Preservation Office, and application of the Programmatic Agreement.

**NRHP Nomination of Sperry Flour Company, Vallejo, Solano County, California, 2017.** Kara prepared the NRHP nomination packet including historic context, the 10-900 form, historic figures, and photo-documentation of the historic flour mill. Located on the eastern shore of Mare Island Strait, flour was milled on the site with few interruptions from 1869 through 2004. The district's most important resources are its World War I-era mill buildings, which were designed by engineer Maurice Couchot represent an important early use of reinforced concrete in large industrial buildings. It was added to the NRHP in late 2017.

**Historic Assessment, Muir Woods, Golden Gate National Recreation Area, Marin County, California, 2016-2017.** Kara acted as Lead Historian for a condition assessment and documentation of contributing elements to the NRHP-listed Muir Woods Historic District at Muir Woods National Monument in preparation for a planned habitat enhancement project. She also assisted with preparation of the cultural resources section of the Draft Subsequent EIR for this project.

**Historic Resources Survey, NASA/Jet Propulsion Laboratory, Pasadena, California, 2015.** Kara acted as Historian/Architectural Historian for a historic resource survey conducted for the National Aeronautics and Space Administration's (NASA's) Jet Propulsion Laboratory (JPL) Pasadena facility. Kara assisted with analysis of whether the seven previously determined eligible buildings and structures at the JPL facility (and the 20 buildings and structures that are the subject of this survey) possessed a linkage historically or aesthetically and retained their historic significance and integrity to merit listing in the NRHP as a historic district.

**Lawrence Berkeley National Laboratory (LBNL) Second Campus Project Environmental Assessment and Environmental Impact Report, 2012 – 2013.** Kara contributed to the preparation of a draft historic resources evaluation report as part of an Environmental Assessment and Environmental Impact Report prepared for LBNL's proposed second campus in Richmond, California. The project included the recordation and evaluation of twenty historic-period buildings within the project area according to National Register of Historic Places and California Register of Historic Resources criteria.

**Architectural Historian for Historic Buildings and Structures Inventory for Fort Hunter-Liggett, Jolon, California, 2012 – 2013.** Kara participated in the preparation of an update to the existing Fort Hunter Liggett inventory of historic buildings. The project included the recordation and evaluation of twenty historic-period buildings located within the boundaries of Fort Hunter Liggett. None of the buildings were found eligible for the National Register of Historic Places or the California Register of Historic Resources.