



October 15, 2019

(By Electronic Transmission)

City of Oakland Planning Commission
Robert Merkamp, Secretary
Rebecca Lind, Planner; Betty Marvin, Cultural Heritage Survey

Subject: Notice of Preparation—California College of the Arts and Clifton Hall Redevelopment Project, Case File ER19003

Dear Members of the Planning Commission, Ms. Lind, and Mr. Merkamp,

Oakland Heritage Alliance submits these updated comments upon the Notice of Preparation for the project on the to-be-former campus of the California College of the Arts and Clifton Hall.

We appreciate the Planning Commission's continuation of its hearing to allow time for the hearing at the Landmarks Preservation Advisory Board.

The entirety of Parcel 1 is an Area of Primary Importance. As you know, this campus is a key historic and cultural resource that has held an important place not only architecturally, and with regard to landscape, but as a cultural institution. Thus its significance is multifaceted, and much bound up with the cultural life of the city in which the college has been located since its beginning in 1907. We greatly regret that the college has decided to abandon the city of its founding. We hope that Oakland will retain this API as an integral contributor to our city's cultural heritage.

We have grave doubts about the rationale of granting significant general plan amendments and zoning changes for a revenue-generating project, with the value of the land sale accruing to a now-San Francisco-based institution, unless significant community benefits result, and our historic API survives intact.

In the Environmental Documents, the following should be studied in detail:

1. The proposed project's overall design and massing compatibility with the surrounding neighborhood contexts. Study alternatives which might more effectively attain compatibility with these contexts, particularly, but not exclusively, with reference to Arts and Crafts style.
2. Study alternatives for preservation rather than destruction of the long wall along Broadway, including the important vehicular entrance gate. The plans show only a small part preserved. The viability of the proposed commercial/retail uses along Broadway that would replace the wall is questionable. See Comment 13 below.

It is not clear why the wall needs to be removed to accommodate Building D. Preserving that portion of the wall would instead appear to facilitate development of Building D.

3. Fully study an alternative which keeps the historic buildings in their current locations. Recognizing that the carriage house has been repositioned before, nonetheless, under the Secretary of Interior Standards, preservation *in situ* is far preferable. All the alternatives, additionally, should address design approaches which step back from the retained historic buildings, are subordinate to them, and relate gracefully to them rather than overwhelming them.
4. Historic landscape: The entire site constitutes a cultural landscape. Inventory all trees and significant plantings, other site elements, and their histories and relationships. Analyze the feasibility of the proposed relocation of mature live oaks. Prepare an alternative which preserves a greater portion of the historic landscape. Retain the relationship between planted areas, the historic wall, buildings, and the pedestrian and vehicular gates. Provide an arboricultural assessment of the existing mature trees, including measures to prolong their lifespan. Study alternatives that facilitate and enhance public use of the space, and design alternatives that avoid walling off the landscaped area on three sides, hemming it in to a great degree. Consider sunlight.

The proposed historical resources evaluation in the scope of work proposes to address "the campus as a historic district inclusive of cultural landscape." Regarding the historic trees, the little leaf linden (*Tilia cordata*) and two giant sequoias (*Sequoia giganteum*) are rated C1+ on the 1993 API map and are identified as dating from the 1880s, i.e. when the Treadwell House was constructed. The two giant sequoias appear to still be standing, but do not appear to be in good condition. Is the little leaf linden still standing?

5. Study the landscape as wildlife habitat.
6. Compare the air quality and ecosystems services provided by the current landscape and by the potentially reworked area shown in the proposed plans.
7. The significant artistic, cultural, and educational history of the site is not sufficiently honored nor maintained in a meaningful way in the proposed plan. The artistic and educational contributions of generations of artists should be studied as part of the cultural resource, and alternatives prepared that continue a significant amount of artistic activity, and that commemorate or interpret the site. Include these in proposed alternative approaches and in any mitigation scheme for impacts to the API. In addition to exploring the long list of innovative contributors to the college, and to Oakland's, the Bay Area's, and California's cultural life, as well as nationally and internationally, please describe the interrelationships between CCA and other local cultural resources such as Studio One, and other educational and arts institutions. Look at important arts movements and how they are connected with CCA as an Oakland cultural resource. And lastly, explore the contributions of women and historically underrepresented people who participated at CCA as faculty or students.
8. The number of "affordable" units is far too minimal to mitigate the effects on the arts community, and it is difficult to know how units could legally be reserved for practicing

artists. The Clifton Hall housing, off-site from the main campus, is envisioned in the proposed plan to furnish fewer accommodations than are now provided as college housing. In considering the requests for general plan and zoning amendments, analyze what community benefits can be provided that would make it worthwhile in view of the impacts. Consider alternatives that include more affordable units, at deeper levels of affordability. This developer is asking the city to change its general plan; it appears to create a large additional value. Oakland could request a more substantial degree of subsidy in housing units. (With all due respect to CCA, by what rationale should Oakland finance an institution which is moving to San Francisco?)

- Oakland is already on track to meet DOUBLE its RHNA allocation for above-moderate housing, but is falling short on meeting RHNA for very low, low, and moderate income.
 - Only 7% of units developed from 2015–2018 were affordable. This is far too low, and the City needs to prioritize development of deed-restricted affordable housing.
 - Any additional affordable housing required in connection with rezoning should be in addition to payment of the City's Affordable Housing Impact Fee, and these additional units should not be allowed to count as meeting the fee ordinance's provision for alternative compliance by providing units on site.
9. The height of the tower is excessive in the neighborhood context, would set a very bad precedent, and the construction type would require units to be expensive. What are the demographic effects of inserting high-end housing at a time when there is general recognition that low to moderate income housing is what is needed in Oakland? How will family housing units be incorporated? What provisions are made to integrate the development with the larger urban area, and avoid its development as an isolated high-end enclave?
 10. The proposed open space area does not appear welcoming to the general public; although the developer has asserted it will provide a public benefit, as proposed it would be privately owned, bounded on three sides by large-scale structures, and likely to feel private and exclusionary. How can the site be better connected and more useful to the neighborhood in which it sits?
 11. How can the city use this opportunity to coordinate planning with the large adjoining site at Pleasant Valley/Broadway, especially as many traffic, pedestrian, bicycle, and safety concerns are shared? Provide a framework under which the city can consider both sites and plan for an integrated zoning scheme, before entertaining any general plan or zoning changes.
 12. The proposed traffic, pedestrian, transit, and site access arrangements seem problematic, with potential safety problems. Study pedestrian access, traffic safety, driveway access, impacts on adjoining neighborhoods, life safety access, and effects on the College Avenue commercial corridor.
 13. The commercial/retail ground floor is placed awkwardly and is unlikely to succeed as located. Retail is already not flourishing in the age of Amazon; it makes no sense to add

additional retail frontage on historically non-retail streets such as Clifton and this stretch of the east side of Broadway. Study an alternative which eliminates retail on Clifton and Broadway frontages, and concedes that the project is a residential development.

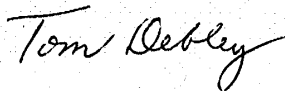
14. Please show an alternative in which the project builds to existing residential zoning requirements, without any general plan and zoning alterations. Also study alternatives that require less significant General Plan and zoning amendments; and alternatives that preserve all, or more than what is currently proposed, of the existing buildings for housing with as many affordable units as possible, including creative or unconventional housing arrangements, such as group quarters, single room occupancy, cohousing or communal configurations, live-work, work-live, etc.

Overall, Oakland Heritage Alliance finds that the project is not fully thought through, and is not ready to move forward.

From the historic preservation point of view, all of the buildings and landscape should be reviewed, including the more recent structures, with reference to the overall API—the activities, institutional history, community involvements and cultural and artistic connections of the people and activities in the arts community and in Oakland. A complete cultural landscape workup is in order. Alternatives must include preserving historic structures *in situ*, and the EIR must consider the effects overall of such an intense building program on the API.

It would be a huge missed opportunity not to consider this project in connection with the entire stretch of Broadway's east edge from 51st to Broadway Terrace, and so in addition to delaying the EIR, the planning department should consider doing a planning study including all the parcels on that frontage.

Sincerely,



Tom Debley
President

cc:

William Gilchrist, Ed Manasse, Catherine Payne
Councilmember Dan Kalb
Councilmember Rebecca Kaplan