



April 10, 2017

(By electronic transmission)

Members of the Oakland Landmarks Preservation Advisory Board
Matthew Weintraub, Secretary

Dear LPAB board members,

Oakland Heritage Alliance has been constrained in its comments on the HRE by the lack of time for review. However, we strongly urge the Landmarks Preservation Advisory Board to find that the staff report, the Carey Report, and the peer review are deficient. Insufficient and inadequate attention and study is given to views of the historic resource and to the potential visual impacts of future construction upon views toward the Hotel Claremont from beyond its immediate area. Where is the discussion of views of the hotel and environs from the surrounding east bay area—the freeways, from public streets, and so on?

We also question the lack of a thorough historic landscape assessment. Was a qualified landscape historian consulted for this HRE? We find the descriptions of the historic and current plantings and planted areas rather vague and general. We expected a summarizing discussion of any possibilities or suggestions for appropriate restoration or preservation of remnants of the original.

We understand that the consultants assert that the present southeast parking lots are not “historic” and ought not be included in a designated historic district or national register district. The reasoning is that there is little built or planted upon this part of the site that can be identified as historic structure or landscape. But the area being considered for the construction of new dwellings has contributed to an envelope of space around it *since the beginning of the hotel’s existence*. This space is part of what creates the iconic views of the hillside from near or far. Such open space is alluded to in the Secretary of Interior standards, appended at the end of this letter.

The HRE does not consider the way the hotel appears from vantage points beyond the property, which could be affected by building sizable structures in today’s parking area. We found one brief sentence (page 3 of Carey report, under Summary of Findings, last paragraph) which alludes to views of the resource. There are no images to support this aspect. Additional study and photos must be included, describing the visual effect of the space above the southeast parking areas upon views toward the building and its site. Without current plans for the future project, we can’t be sure, but probably such a study should also be carried out for views from areas below the site, where sightlines could be affected by structures taller than those currently extant. How tall can structures be before they impede views?

We have raised these issues previously in earlier letters about this project.

If protection of the southeast auto entry and parking areas as part of the API or historic district were maintained, the visual impacts upon the hotel as seen from points around it would have to be considered as future structures are planned. Can the hotel be protected from visual competition and a lessening of its visual importance if the boundaries are redrawn? To protect the iconic views of the hotel, we strongly

believe the whole area should remain within the designated API. In amputating this area from the API, some could think that it would be acceptable to build structures even though they might have a profound visual impact on how the remaining historic site looks to viewers around the east bay and beyond. If such contraction of the API occurs, what will remain as guidelines for development? Will aesthetic and view impacts upon a national register landmark of great importance be minimized in any planned project?

The guidelines appended below from the Secretary of Interior standards ought to be followed, no matter what the official designation of the southeast auto entry and parking lots. This or any proposed future project could endanger iconic views of a key East Bay landmark. "*Historic landscapes and significant viewsheds must be preserved.*"

We urge the LPAB not to approve of this rationale for redrawing the boundaries, This viewshed issue must be studied further, sorted out, and a limit placed upon the level of visual distraction, size, massing, and visual competition allowed on a site so close to the historic hotel.

From Secretary of the Interior's Standards at: <https://www.nps.gov/tps/standards/applying-rehabilitation/successful-rehab/new-construction.htm>

It is possible to add new construction within the boundaries of historic properties if site conditions allow and if the design, density, and placement of the new construction respect the overall character of the site. According to the [Secretary of the Interior's Standards for Rehabilitation – Standard 9](#) in particular – and the [Guidelines for Rehabilitating Historic Buildings](#), new construction needs to be built in a manner that protects the integrity of the historic building(s) and the property's setting. In addition, the following must be considered:

- *Related new construction – including buildings, driveways, parking lots, landscape improvements and other new features – must not alter the historic character of a property. A property's historic function must be evident even if there is a change of use.*
- *The location of new construction should be considered carefully in order to follow the setbacks of historic buildings and to avoid blocking their primary elevations. New construction should be placed away from or at the side or rear of historic buildings and must avoid obscuring, damaging, or destroying character-defining features of these buildings or the site.*
- *Protecting the historic setting and context of a property, including the degree of open space and building density, must always be considered when planning new construction on an historic site This entails identifying the formal or informal arrangements of buildings on the site, and whether they have a distinctive urban, suburban, or rural character. For example, a historic building traditionally surrounded by open space must not be crowded with dense development.*
- *In properties with multiple historic buildings, the historic relationship between buildings must also be protected. Contributing buildings must not be isolated from one another by the insertion of new construction.*
- *As with new additions, the massing, size, scale, and architectural features of new construction on the site of a historic building must be compatible with those of the historic building. When visible and in close proximity to historic buildings, the new construction must be subordinate*

to these buildings. New construction should also be distinct from the old and must not attempt to replicate historic buildings elsewhere on site and to avoid creating a false sense of historic development.

- *The limitations on the size, scale, and design of new construction may be less critical the farther it is located from historic buildings.*
- *As with additions, maximizing the advantage of existing site conditions, such as wooded areas or drops in grade, that limit visibility is highly recommended.*
- *Historic landscapes and significant viewsheds must be preserved. Also, significant archeological resources should be taken into account when evaluating the placement of new construction, and, as appropriate, mitigation measures should be implemented if the archeological resources will be disturbed.*

We urge that the Landmarks Preservation Advisory Board request further work on this HRE and the associated documents

Sincerely,

A handwritten signature in cursive script that reads "Alison Finlay".

Alison Finlay
President