EASTLINE PROJECT - 2100 TELEGRAPH

Response to Comments Document

State Clearinghouse No. 2016122009

Prepared for the City of Oakland

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June 2018
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I. INTRODUCTION

A. PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT

This Response to Comments (RTC) document has been prepared to document responses to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the proposed Eastline Project - 2100 Telegraph (Eastline project or project) (State Clearinghouse #2016122009). The Draft EIR identifies the likely environmental consequences associated with the implementation of the proposed project, and recommends mitigation measures to reduce potentially significant impacts. This RTC document includes: a short description of the environmental review process, the comments received on the Draft EIR and responses to those comments, and text revisions to the Draft EIR in response to the comments received and/or to amplify or clarify material in the Draft EIR.

This RTC document, together with the Draft EIR, constitutes the Final EIR for the proposed Eastline project.

B. ENVIRONMENTAL REVIEW PROCESS

According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR. The City of Oakland (City) circulated a Notice of Preparation (NOP) that briefly described the proposed project and the environmental topics that would be evaluated in the Draft EIR. The NOP was published and submitted to the State Clearinghouse on December 2, 2016. The 30-day public comment period for the scope of the EIR lasted from December 2, 2016 to January 3, 2017. The NOP was sent to the State Clearinghouse, responsible and trustee agencies, organizations, and interested individuals with properties within 300 feet.

Project scoping sessions were held before the Landmarks Preservation Advisory Board (LPAB) on December 12, 2016 and before the Planning Commission on December 21, 2016. Written NOP comments were received from the State Clearinghouse and Planning Unit, State Department of Transportation (Caltrans), East Bay Municipal District (EBMUD) and the Oakland Heritage Alliance (OHA). The NOP and comment letters are included in Appendix A of the Draft EIR. Comments received by the City on the NOP at the public scoping sessions were taken into account during the preparation of the EIR.
The Draft EIR was published on December 22, 2017 and distributed to applicable local and State agencies. A Notice of Availability of the Draft EIR (NOA) was mailed to all individuals previously requesting to be notified of the Draft EIR, in addition to those agencies and individuals who received a copy of the NOP.

The 45-day public comment period for the Draft EIR began on December 22, 2017 and ended on February 5, 2018. Public hearings were held for the Draft EIR following the comment period, on January 24, 2018 before the Planning Commission, and on February 5, 2018 before the LPAB. There were no comments provided at the Planning Commission hearing. Three members of the public and four LPAB Members provided comments during the LPAB hearing. Their comments and the City’s responses are provided in Chapter III, Comments and Responses, of this document.

C. DOCUMENT ORGANIZATION

This RTC document consists of the following chapters:

Chapter I: Introduction. This chapter discusses the purpose and organization of this RTC document and the Final EIR, and summarizes the environmental review process for the project.

Chapter II: List of Commenting Agencies, Organizations, and Individuals. This chapter contains a list of agencies, organizations, and persons who submitted written comments or spoke at the public hearing on the Draft EIR during the public review period.

Chapter III: Comments and Responses. This chapter contains reproductions of all comment letters received on the Draft EIR as well as a summary of the comments provided at the public hearing. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the preceding comment.

Chapter IV: Text Revisions. Corrections to the Draft EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are contained in this chapter. Text with underline represents language that has been added to the Draft EIR; text with strikeout has been deleted from the Draft EIR. Revisions to figures are also provided, where appropriate.
II. LIST OF COMMENTING AGENCIES, ORGANIZATIONS, AND INDIVIDUALS

This chapter presents a list of letters and comments received during the public review period of the Draft EIR and describes the organization of the letters and comments that are included in Chapter III, Comments and Responses, of this document.

A. ORGANIZATION OF COMMENT LETTERS AND RESPONSES

During the 45-day comment period, the City received written comments from 5 agencies, 13 individuals, and 2 organizations. In addition, 3 members of the public and 4 Landmarks Preservation Advisory Board (LPAB) Members provided verbal comments. This RTC document includes a reproduction of each written comment letter (or email) in its entirety received on the Draft EIR and a summary of comments made at the public hearing before the LPAB. Written responses to each comment are provided. Written comments received during the public review period on the Draft EIR are provided in their entirety.

The comment letters are numbered consecutively following the A, B, and C designations. The letters are annotated in the margin according to the following code:

- State, Local and Regional Agencies: A#
- Individuals and Organizations: B#
- Public Hearing: C#

The following agencies and individuals provided written or verbal comments.

**State, Local, and Regional Agencies**

A1 Peter Birkholz, Chair, Oakland Landmark Preservation Advisory Board January 21, 2018
A2 Christopher Andrews, Oakland Landmarks Preservation Advisory Board January 22, 2018
A3 David J. Rehnstrom, Manager, Water Distribution Planning, East Bay Municipal Utility District January 26, 2018
A4 Ian Griffiths, Senior Planner, Bay Area Rapid Transit District February 5, 2018
A5 Governor’s Office of Planning and Research State Clearinghouse and Planning Unit February 6, 2018

**Individuals and Organizations**

B1 Alison Finlay, President, Oakland Heritage Alliance January 22, 2018
B2 Alison Finlay, President, Oakland Heritage Alliance February 5, 2018
B3 June Brumer January 29, 2018
B4  Matthew & Jane Gabel  January 29, 2018
B5  Jeffrey Hill  January 29, 2018
B6  Katherine W. Jarrett  January 29, 2018
B7  Tommaso Sciortino  January 29, 2018
B8  Sara Wynne  January 29, 2018
B9  Dr. Janice W. Yager  January 29, 2018
B10  Jeanne Dunn  January 29, 2018
B11  Vivian Romero  January 30, 2018
B12  Susan Sawyer  January 30, 2018
B13  Mary Anne Urry  January 30, 2018
B14  Edith Yhuel  January 30, 2018
B15  Elizabeth Callaway  January 30, 2018
B16  Leslee Stewart, General Manager, Paramount Theatre  February 5, 2018

Landmarks Preservation Advisory Board Public Hearing
C1  Naomi Schiff  February 5, 2018
C1  Daniel Levy  February 5, 2018
C1  Riley Doty  February 5, 2018
C1  Board Member Vince Sugrue  February 5, 2018
C1  Board Member Nenna Joiner  February 5, 2018
C1  Chair Christopher Andrews  February 5, 2018
C1  Vice Chair Peter Birkholz  February 5, 2018
III. COMMENTS AND RESPONSES

Written responses to all comments on the Draft EIR are provided in this section. Letters received on the Draft EIR are provided in their entirety. Each letter is immediately followed by a response keyed to the specific comment.
A. STATE, LOCAL, AND REGIONAL AGENCIES
January 21, 2018

Peter Birkholz
Chair, Oakland Landmark Preservation Advisory Board
pbirkholz@gmail.com

RE: Eastline Project – 2100 Telegraph EIR

Dear Chair Nagraj and Planning Board Commissioners,

Do to a lack of quorum at our scheduled meeting of January 8, 2017, the Landmark Preservation Advisory Board was unable to meet and therefore unable to have a discussion on this project. The following comments were to be directed to the LPAB Secretary, Matt Weintraub, it is my understanding that Matt is no longer working for the City of Oakland therefore I am sending these comments directly to you.

First, I would like to say that I am supportive of new development in the City. As Chair of the LPAB I feel a responsibility to comment upon the impacts of new development on our City’s Historic Resources.

After a thorough review of the project’s EIR documents I am of belief that the current EIR is deficient by not providing sufficient information on the potential historic resources at the project site and in the general vicinity in several respects. Without the background information on these potential resources it is not possible to understand the full historic status and the potential impacts to these resources/potential resources and it is therefore not possible to develop mitigations for impacts to these resources/potential resources.

Prior to voting to approve this EIR I ask that the following information is provided:

- **Preparation of supporting graphic information for:**
  - Provide a vicinity map that shows the outlines of all adjacent API’s and ASI’s that may be impacted by the project including: Oakland Uptown Art and Entertainment District API, Cathedral District API, and the 25th Street Garage District ASI.
  - Provide Sanborn maps that are verbally described in the Historic Resources Analysis, Appendix B, pages B-7 through B-11.

- **Provide additional graphic and written information on the following potential historic resources at the project site including the original permit drawings (if available), period photos and information that describes the changes to these potential historic resources. Without this information these resources cannot be properly evaluated:**
  - 2150 Telegraph, Kwik-Way. If relocation or incorporation of the sign are to be considered, we need to know what the significance of the resource is. The EIR should be amended with a full evaluation of this property (DPR 523 form). Supplemental graphic information should be provided. Does the development of this building and the two other Kwik-Ways during the same time period by Lehman and Mahoney constitute a discontinuous district? If so what is the status of such?
  - The 2101-2105 Broadway, from personal observation I know that the interior of this building and the rear canopy over the drive-up bay has been altered. What other changes have occurred to this building that may affect its integrity?
  - 2121-2127 Broadway, to my understanding other than the painting of the exterior, this building retains a high level of historic integrity. What other changes have occurred to
this building that may affect its integrity? What influence did Richard Meyer and the New York 5 have on this Architect and the design of the building? Please note that the project description for this building is incorrect in describing the building as painted concrete, the building has enameled steel panels that were recently painted over. I believe that this building is California Register eligible for its Architectural design.

- 2135-2147 Broadway, obviously this building has been altered. Can we get supplemental information (photos) to show the changes?
- 2100 Telegraph Avenue. Provide supplementary information that describes the relationship between this City of Oakland owned building and the construction of the BART system that runs underneath it.

- Provide DPR forms or other evaluation of the current status of adjacent historic resources and potential resources. Given the scale and potential impacts of this project onto the adjacent potential historic resources it is not sufficient to reference evaluations that were done of these properties in the 1980’s, supplemental evaluation of the following should be added to the EIR:
  - 517-523 22nd Street
  - 524 22nd Street
  - 2025 Broadway
  - 2201 Broadway
  - 2211-2221 Broadway
  - 2001-2009 Telegraph Ave
  - 2022 Telegraph Ave
  - 2025 Telegraph Ave
  - 2040 Telegraph Ave
  - 2101-2115 Telegraph Ave
  - 2200 Telegraph Ave
  - 2225 Telegraph Ave

- Provide supplemental information that describes the Broadway streetscape and potential impacts to this that will be caused by the project. I do not know the history but believe that there was a BART or City of Oakland funded streetscape project, from 14th and Broadway to West Grand and Broadway, that included sidewalk improvements (seeded concrete with tile borders), London plane trees and other improvements (circa 1970?). Is this a significant landscape element that may be impacted by the project?

The shadow studies: suggest that the that maximum office scenario is out of scale and that it casts shadows at the winter months that are detrimental to the 25thStreet Garage District ASI. I urge that if this scenario is not considered as it is out of scale and will impact vast areas of the city by its shadows.

Thank you for your consideration of these comments.

Sincerely,

Peter Birkholz
Chair, Oakland Landmark Preservation Advisory Board.
LETTER A1
Oakland Landmark Preservation Advisory Board
Peter Birkholz, Chair
January 21, 2018

Response A1-1. These introductory comments are noted. The comments do not address the adequacy of the Draft EIR; no further response is necessary.

Response A1-2. Appendix B of the December 2017 Draft EIR provides a more detailed analysis of the historic resources on the project site and the other banking related buildings in downtown Oakland. This was summarized in Section V.B, Cultural and Historical Resources, of the Draft EIR and the revised Appendix B Historic Resource Analysis, April 2018 provides additional information.

Response A1-3. The historic resource vicinity map and Sanborn maps are provided in the revised Appendix B Historic Resource Analysis, April 2018 in Attachment A of the Chapter IV, Text Revisions.

Response A1-4. 2150 Telegraph – Kwik Way - A full history, description, integrity assessment and determination of eligibility of the Kwik Way building as a potential historic resource under CEQA was provided in Appendix B of the Draft EIR. See the revised Appendix B Historic Resource Analysis, April 2018 for information on the other two existing Kwik Way buildings in Oakland and a discussion of a potential discontinuous historic district. The former Kwik Way building at 6215 International Boulevard (formerly E. 14th Street) has been significantly altered. The City has approved a proposed development project on the site currently occupied by the former Kwik Way at 500 Lake Park Avenue. The Kwik Way building was considered during the development review for the project on this site, and was not considered a historic resource. A discontinuous historic district would likely include additional Googie/diner/burger joints throughout the City. A discontinuous or thematic district has not been fully evaluated as part of the environmental review for this project because the City of Oakland has not previously identified any discontinuous or thematic districts. The only other thematic grouping designated by the City of Oakland are the four Oakland Carnegie Libraries which were designated together in one nomination in November 1980.
It is not standard procedure to complete new or revised DPR forms as a component of historic resource assessment for an EIR historic resource assessment in Oakland. The information provided in Appendix B is sufficient to assess the buildings on the project site with consistent CEQA Guidelines.

2101-2105 Broadway – Formerly Security Pacific Bank - see the revised Appendix B Historic Resource Analysis, April 2018 for additional information on alterations and the integrity of this building.

2121-2127 Broadway – Formerly Sanwa Bank - see the revised Appendix B Historic Resource Analysis, April 2018 for additional information on alterations and the integrity of this building. Influence of New York Five on design of this building – Iyama studied at UC Berkeley, graduating after World War II in 1949. Iyama likely kept up with architectural journals of the day, but it is not believed that he ever practiced in New York. Iyama’s Sanwa Bank building was completed in 1975. The book Five Architects was published in 1972. Iyama died in 1992 and was certainly of the same “generation” as the group that became known as the New York 5 (architects Eisenman, Graves, Gwathmey, Hejduk and Meier). There was considerable debate about Modern design during the 1970s, resulting in an eventual break with Modernism that resulted in what became known as Post Modern architecture. Five Architects was criticized in an Architectural Forum essay in 1973 by five other architects, dubbed Five on Five (the other five being architects Giurgola, Greenberg, Moore, Robertson and Stern). The continuing debate about architectural treatment, site planning and context raged during the 1970s. Not every architect practicing at the time was looking to the New York Five for inspiration. Iyama’s Oakland Sumitomo Bank Building is the more significant and architecturally creative of his bank buildings.

2135-2147 Broadway – Formerly Sherman Clay Building - See the revised Appendix B Historic Resource Analysis for additional information on alterations and the integrity of this building.

2100 Telegraph Avenue – City Parking Garage - The information provided in Appendix B of the Draft EIR (updated as part of this RTC) states that the building was designed by VBN architects and received a Certificate of Occupancy in 1978. This project was a city-sponsored project, likely for use by city employees, and it does not appear to have a connection to BART.
Response A1-5. No new DPR forms were completed for any buildings on either the project site or on adjacent parcels. The Historic Resources Analysis employed methodology consistent with other recent efforts utilized by other projects in Oakland, including but not limited to two projects in the 1700 block of Webster Street that were reviewed and approved by the City of Oakland, and the Broadway/Valdez District Specific Plan EIR and other recent specific plan efforts, all of which did not require new DPR forms to be completed. The project site buildings were evaluated in Appendix B of the Draft EIR. The surrounding buildings were photographed and described, current historic status identified, and any potential substantial alterations visible in the field noted.

Response A1-6. An evaluation of the streetscape design along Broadway was not included in the Historic Resources Analysis as it extends well beyond the area of the project. Further, the Broadway streetscape was not identified in discussions with the City as a potential resource for study in the Draft EIR. The exposed aggregate concrete finish with the tile bands along the Broadway Streetscape were installed after the BART project was completed in the 1970s. According to the City of Oakland Department of Public Works, since installation there have been modifications to this section and adjacent sections of the Broadway streetscape. There is no desire to replace in-kind due to safety and slipping hazards created by the older streetscape features.

Response A1-7. The Draft EIR analyzes shade and shadow impacts to potential surrounding historic resources on pages 187 through 190. A total of 24 historic resource sites in the project area were included in the shade and shadow study. The Draft EIR finds that the “major architectural features that make surrounding buildings eligible as historical resources under CEQA would not be compromised by shade cast on the building by the project development scenarios (as shown in Appendix E). Many of these physical characteristics are already subject to shadows cast by existing mid- and high-rise buildings, and contribute to the integrity of the building independent of direct light effect.” Additionally, new shadows cast in the 25th Street Garage District would not degrade the historical status of the collection of auto garage buildings with decorative facades as intermittent shadows would not change the value of historical features or the character of the district. Therefore, new project-generated shadows would not take away from the significance of existing historic resources in the area nor the surrounding historic districts.
January 22, 2018

To the Oakland Planning Commission
RE: 2100 Telegraph EIR

Dear Chair Nagraj and Planning Board Commissioners,

The Landmark Preservation Advisory Board was unable to meet on January 8, 2017, due to a lack of quorum. I am therefore forwarding my comments on the 2100 Telegraph Avenue EIR directly to you.

Reviewing the EIR documents I am concerned that the report to date has not provided all the information required to fully understand and evaluate the project's historic resource's status and potential impacts to these resources, including:

- A full vicinity map with key indications of the adjacent API's and ASI's including: Oakland Uptown Art and Entertainment District API, Cathedral District API, and the 25th Street Garage District ASI.
- All the Sanborn maps that are indicated in the Historic Resources Analysis
- Permit drawings, historic photos and all other City generated information and documentation on the various buildings affected by this project

I also feel that a more comprehensive visual study of the impacts to the Uptown Arts and Entertainment District API of the proposed build out alternates should be provided, including three dimensional views and detailed written analyses.

Thank you for your consideration,

Christopher Andrews
Oakland Landmarks Preservation Advisory Board
chrisrandrew@sbcglobal.net
LETTER A2
Oakland Landmarks Preservation Advisory Board
Christopher Andrews
January 22, 2018

Response A2-1. These introductory comments are noted. The comments do not address the adequacy of the Draft EIR; no further response is necessary.


Response A2-3. The Draft EIR analyzes visual character on page 435 through 448, which includes visual simulations looking at the project site under all four development scenarios. Additional visual simulations are included in this RTC document for reference (see Figures III-I and III-4). These additional visual simulations illustrate that the proposed project would not block or take away from the historic significance of adjacent historic resources (namely the Paramount Theater, Breuner Building, and First Baptist Church), regardless of the development scenario. As stated on page 442 of the Draft EIR, “The proposed development would have a contemporary style, which would contrast with the combination of Art Deco, Georgian Revival, International, and Doric-style architecture in the area. However, while the project would be of a different scale and architectural style than the immediately surrounding buildings, this would not result in a significant visual impact. The juxtaposition of historic and modern buildings is part of what creates an interesting urban fabric, and provides evidence of the way that cities continually grow and change.” In addition, the Draft EIR states on page 442 “under all development scenarios, it would stand out as a prominent feature against Oakland’s skyline. However, under all scenarios, the project would follow the design guidelines approved by the City to ensure the construction of a high-quality development that would not visually degrade the surrounding area.”
Figure III-1
Visual Simulation-Broadway Looking North at Project Site
All Office Scenario

Eastline Project - 2100 Telegraph EIR
Figure III-2
Visual Simulation-Downtown Looking North at Project Site
All Office Scenario

Eastline Project - 2100 Telegraph EIR

Source: Gensler 2018
Figure III-3
Visual Simulation- Broadway Looking South at Project Site
All Office Scenario

Source: Gensler 2018
Figure III-4

Visual Simulation-22nd Street at Broadway Looking West at Project Site
All Office Scenario
January 26, 2018

Peterson Vollman, Planner IV  
City of Oakland Planning and Building Department  
250 Frank H. Ogawa Plaza, Suite 2114  
Oakland, CA 94612

Re: Notice of Availability of a Draft Environmental Impact Report – Eastline Project – 2100 Telegraph Avenue, Oakland

Dear Mr. Vollman:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Eastline Project (Project) located at 2100 Telegraph Avenue in the City of Oakland (City). EBMUD provided written comments to the City on the Notice of Preparation of a Draft EIR for the Project on December 21, 2016; these comments (see enclosure) still apply regarding water service, wastewater service, and water conservation with the exception that the City request a Water Supply Assessment which was completed in March 2017. EBMUD has no additional comments on the Draft EIR.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,

[Signature]

David J. Rehnstrom  
Manager of Water Distribution Planning

DJR:SIR:dks  
sb18_020

Enclosure: Letter dated December 21, 2016

cc: W/L Telegraph Owner, LLC  
644 Menlo Avenue, Suite 205  
Menlo Park, CA 94025
LETTER A3
East Bay Municipal Utility District
David Rehnstrom, Manager, Water Distribution Planning
January 26, 2018

Response A3-1. The comment acknowledges receipt of the Draft EIR by the East Bay Municipal Utility District and references prior written comments provided on the Notice of Preparation on December 21, 2016 that still apply to the project. The comment does not address the adequacy of the Draft EIR. No additional response is necessary.
February 5, 2018

Attn: Peterson Vollmann, Planner IV
City of Oakland Department of Planning and Building, Bureau of Planning
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612

RE: Comments on Draft EIR for Eastline Project – 2100 Telegraph, Case Number ER16-011

Dear Peterson:

The San Francisco Bay Area Rapid Transit District (BART) is pleased to provide comments on the DEIR Prepared for 2100 Telegraph project, Case Number ER16-011.

As part of the document’s “Planned Transportation Network Changes” (p.221) BART feels it is important to highlight several funded BART expansion projects that will further improve the site’s already excellent public transportation access within the region. These include BART’s 19th St. Station Modernization improvement (including additional fare gate capacity, a new north end elevator; additional in station bicycle parking, and other capacity and access improvements) and BART’s Eastern Contra Costa County and Silicon Valley extensions, which will expand the accessibility of the site to an even greater share of the region prior within the next several years. More information on these projects is available on www.bart.gov.

BART’s primary concern with this DEIR and the impacts of this project is the excessive amount of parking associated with the project, and the vehicle miles travelled and greenhouse gas emissions that would result from the oversupply of parking. The project proposes 1,750 new parking spaces one block from a major BART station that is at the center of BART’s transit network. The project location is one of the most transit-accessible locations in the entire Bay Area; more accessible from much of the region than Downtown San Francisco, where most new office projects have minimal or no new parking. This is not an appropriate place for what would be, if built, one of the largest parking garages in Oakland.

In June 2016, the BART Board of Directors adopted an updated Transit-Oriented Development (TOD) Policy, which promotes high quality, intensive development at or near BART stations. BART’s TOD Guidelines, associated with the policy, were developed with extensive input from national and local experts on TOD, including transit agencies, developers, municipalities (including the City of Oakland), and are intended to specifically guide BART and municipalities on how to implement transit-supportive development near stations. The 19th St./Oakland Station is considered a “Regional Center” place type by the guidelines due to its centrality within the BART network, surrounding land uses, and level of transit service – the only other stations with this designation are 12th St./Oakland City Center and Lake Merritt stations in Oakland and the four downtown San Francisco stations.
For these stations, BART’s TOD Guidelines propose no new parking be associated with new office projects – and this recommendation is allowable under existing City of Oakland zoning.

Office projects with zero, or minimal new parking is common in transit-rich, walkable areas in the Bay Area, and can have in important effect on minimizing VMT generated by the project by encouraging the use of alternative modes. BART believes the DEIR significantly underestimates the potential transit, walking, and biking share of trips that would be generated by the project, and overestimates the parking demand.

BART disagrees with the analysis in the DEIR that the project would have a less than significant impact on VMT; BART specifically disagrees with the statement that “The proposed project (and the All Office Scenario) would provide less parking supply than demand, so that the project’s parking supply, while it exceeds code requirements, would not induce demand for more travel.”

The following elements of the estimated parking should be reevaluated:

- Page 244 - The analysis “reduces the ITE based parking demand by 43 percent to account for the non-automobile trips...consistent with City of Oakland Transportation Impact Study Guidelines for vehicle trip generation and is based on the Bay Area Travel Survey (BATS) 2000 which shows that the non-automobile mode share within ½-mile of a BART Station in Alameda County is about 43 percent.”

- Page 245 - “The parking rate determined most relevant for the land use was “Office Building” (ITE Land Use Code 701) on a weekday in a suburban setting. While the proposed project is in downtown Oakland, by choosing the suburban rate, it is acceptable to apply Oakland’s non-auto trip adjustment.”

Response: These reductions overestimate parking demand;

- The BATS 2000 survey is nearly 17 years old and, particularly for downtown Oakland, is not a relevant baseline for mode share and travel behavior – BART has witnessed a huge growth in ridership in its Oakland stations during this period, and a huge increase in pedestrian and bicycle activity. BART recommends the City require using a more recent dataset for the mode share/VMT analysis.

- Applying a standard reduction that is an average for all of Alameda County for any project within ½ a mile of a BART station is not appropriate for the Eastline Project. The Eastline project is not in an average part of Alameda County from a land use and transportation perspective, and it is located less than 500 feet from a BART station, which is very different than a project located within half a mile. The site has more in common with office developments in downtown San Francisco than it does with most parts of Alameda county. Other studies have found that office development within 1/8th of a mile of a transit station to have
significantly higher rates of transit usage than projects further away. This increased likelihood for transit use is not reflected in the calculation of parking demand in the DEIR, and the resulting conclusion that the project “would provide less parking supply than demand” is questionable.

- It is unclear why the DEIR states that trip generation figures for a “weekday in a suburban setting”, with an adjustment, were deemed to be the most relevant figures to use for estimating parking demand. BART suggests a comparison of these rates with the trip generation rate for an office project in an urban infill setting be included in the DEIR.

In conclusion BART believes a project alternative with a reduction of allowable parking should be considered to further mitigate transportation, air quality, and greenhouse gas emission impacts. In combination with the transportation demand management strategies outlined, a project with less parking can support further minimizing the project’s environmental impact to less than significant levels.

Sincerely,

Ian Griffiths
Senior Planner
San Francisco Bay Area Rapid Transit District
LETTER A4
Bay Area Rapid Transit District
Ian Griffiths, Senior Planner
February 5, 2018

Response A4-1. Thank you for sharing BART’s planned network changes including the 19th Street Station Modernization Improvements and both the Eastern Contra Costa County and Silicon Valley extensions. The extensions were incorporated into the Alameda County Transportation Commission (Alameda CTC) travel demand model which was used to generate forecast traffic for purposes of the air quality and noise analyses. The 19th Street Station Modernization improvements will certainly enhance the transit experience, thereby supporting the City’s direction that vehicle trip generation for projects within ½ mile of transit should be reduced 43 percent to account for the transit-rich environment referenced by the comment. Refer to Response A4-3 for additional analysis if different assumptions were made regarding vehicle trip reductions.

Response A4-2. The project’s parking supply would replace the existing 336-space public parking garage, up to 24 existing on-street parking spaces potentially removed by the project, and would provide 1,390 net new parking spaces. There are two ways to consider whether the parking supply is excessive, and both approaches show that the project would not provide excessive amounts of parking.

As noted in the Draft EIR (Table V.C-13) the project estimated demand for parking (under the Maximum Office Scenario) was calculated to be 4,479 spaces based on the 43 percent reduction factor (or a 57 percent automobile mode share). Refer to Response A4-3 for an explanation supporting the use of this reduction factor. The project would provide 1,390 new parking spaces (or about 30 percent of the calculated parking demand). As a result, the project’s parking supply constrains vehicle miles traveled and greenhouse gas emissions that would be generated if the project provided parking supply matching its calculated vehicle trip generation.

To provide additional context, the 1,390 new parking spaces would serve 2.689 million square feet of office uses and 87,000 square feet of retail uses, translating to about 0.50 parking spaces per 1,000 square feet of development space. Pursuant to recent zoning code
amendments, the City no longer requires the provision of any parking for downtown development. The City’s maximums for downtown parking are 3.3 spaces per 1,000 square feet for ground floor uses and 2 spaces per 1,000 square feet for uses above the ground floor. The project would provide approximately 25 percent of the maximum allowable parking for the project’s size. Based on a code analysis, the project would not provide excessive amounts of parking.

A similar exercise was completed for the two smaller development scenarios and Table III-1 documents the findings. The All Office Scenario parking demand exceeds the supply of new parking spaces that would be provided. In addition, the parking supply ratios are about 55 percent of the maximum allowable parking by code. The City’s maximums for downtown parking are 3.3 spaces per 1,000 square feet for ground floor use and 2 spaces per 1,000 square feet for above ground uses. Based both on demand analysis and code analysis, the All Office scenario would not provide excessive amounts of parking. Refer to Response A4-3 for additional analysis if different assumptions were made regarding the project’s vehicle trip reductions and associated parking demand reductions.

As noted in Table III-1 for the Residential/Office Mix Scenario the parking demand exceeds the supply of new parking spaces that would be provided. In addition, the parking supply ratios are less than the maximum allowable parking by code. The City’s maximums for downtown parking are 3.3 spaces per 1,000 square feet for ground floor use and 2 spaces per 1,000 square feet for above ground uses and 1.25 spaces per unit for residential uses. Based both on demand analysis and code analysis, the Residential/Office Mix Scenario would not provide excessive amounts of parking. Refer to Response A4-3 for additional analysis if different assumptions were made regarding the project’s vehicle trip reductions and associated parking demand reductions.
### TABLE III-1 PARKING CHARACTERISTICS – DEVELOPMENT SCENARIOS COMPARISON

<table>
<thead>
<tr>
<th>Development Scenarios</th>
<th>New Parking Demand</th>
<th>New Parking Supply</th>
<th>Parking Supply Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Maximum Office</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.689 ksf office</td>
<td>4,479</td>
<td>1,390</td>
<td>0.50 spaces per ksf</td>
</tr>
<tr>
<td>87 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>All Office</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1,450 ksf office</td>
<td>2,465</td>
<td>1,690</td>
<td>1.10 spaces per ksf</td>
</tr>
<tr>
<td>80 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22.79 ksf community</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Residential/Office Mix</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>880 ksf office</td>
<td>1,785</td>
<td>1,390</td>
<td>1.44 spaces per ksf</td>
</tr>
<tr>
<td>85 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18.5 ksf community</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>395 units residential</td>
<td></td>
<td></td>
<td>1.00 spaces per unit</td>
</tr>
</tbody>
</table>

Source: Fehr & Peers, 2018

The parking supplies shown in Table III-1 only include the new parking supply that would be provided by the project. They do not include the 360 existing spaces that would be demolished and replaced by the project.

Recently adopted environmental documents for downtown office projects were also reviewed to present the range of parking provided. Table III-2 summarizes three projects. The parking ratios ranged from a low of zero to a high of 0.61 parking spaces per ksf. The Maximum Office Scenario would provide about 0.5 parking spaces per ksf which is within the range of the other recent downtown office projects. While the All Office Scenario would provide parking at about 1.10 parking spaces per ksf of office/retail and the Residential/Office Mix Scenario would provide 1.44 spaces per ksf of office/retail; both of which are substantially higher than similar projects shown in Table III-2.
### Table III-2 Example Downtown Office Project Parking Ratios

<table>
<thead>
<tr>
<th>Development</th>
<th>Size</th>
<th>New Parking Supply</th>
<th>Parking Supply Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>1100 Broadway</td>
<td>312 ksf</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2 Kaiser Plaza (Option A)</td>
<td>457 ksf</td>
<td>280</td>
<td>0.61 spaces per ksf</td>
</tr>
<tr>
<td>2 Kaiser Plaza (Option B)</td>
<td>850 ksf</td>
<td>352</td>
<td>0.41 spaces per ksf</td>
</tr>
<tr>
<td>T12</td>
<td>588 ksf</td>
<td>205</td>
<td>0.35 spaces per ksf</td>
</tr>
</tbody>
</table>

Source: Fehr & Peers, 2018

**Response A4-3.**

The methodology for establishing vehicle trip generation and parking in the Draft EIR were consistent with the City of Oakland transportation guidelines in place at the time of the Notice of Preparation. As described on page 233 of the Draft EIR, the City guidelines first calculate vehicle and parking generation using data from documents published by the Institute of Transportation Engineers (ITE). The ITE data is based on data collected at mostly single-use suburban sites where the automobile is often the only travel mode. The comment is correct to note that the ITE data does not reflect a project located within one or two blocks of the 19th Street BART Station. To address this issue the City of Oakland guidelines recommend a 43 percent reduction factor to account for non-automobile trips. The reduction factor was based on the Bay Area Travel Survey (BATS) 2000. As noted in the Draft EIR (page 234) a 2011 research study showed reducing ITE-based trip generation using BATS data results in a more accurate estimation of trip generation for urban developments than just using ITE-based trip generation. The City’s methodology is consistent with this research study.

Since the project would consist of office and commercial uses, the parking demand for the project would be similar to its trip generation; thus, using a similar methodology to estimate the parking demand for the project (applying the BATS 2000-based reductions to ITE parking demand for suburban setting) is reasonable based on the available data and validated methodology. Furthermore, although *ITE Parking Generation, 4th Edition*, provides average parking demand rates for offices in an urban setting, using the ITE data for urban

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settings rather than the Draft EIR methodology would result in a higher parking demand for the project. (The ITE data for an urban setting would estimate a parking demand of 6,768 spaces compared to 4,479 estimated in the Draft EIR).

The comment indicates that the data (BATS 2000) is old particularly for downtown Oakland and that the reduction factors calculated overestimates the parking generation for a project located within 500 feet of a BART station.

In response to this concern, more recent data was reviewed including data from the US Census American Community Survey 2006-2010 (5-year average) which has the most recent workplace summaries as well as data from the California Household Travel Survey (CHTS) 2012-2013. Both datasets provide mode share data for workers by Census tract. Data used focused on Census Tracts 4028 and 4029 which are bound by Grand Avenue, Lake Merritt / Alice Street, 14th Street, and Martin Luther King Way, where the walking distance to a BART station would be less than ¼ mile. The mode split from these two surveys and within these two tracts varies greatly with the automobile mode share ranging from a low of 31 percent of all worker trips to a high of 65 percent of all trips as shown in Table III-3 below. The Draft EIR’s use of a 43 percent automobile mode share reduction is within the range provided by these two data sources and therefore reasonable to use in the Draft EIR. These two data sources provide the best available survey information for worker trips. Data available from BART focuses on BART rider characteristics and does not address workers who drive, walk, bike, or bus to/from their jobs. MTC’s data would need to be extracted from their nine-bay area county travel demand model which forecasts activities based on many model input assumptions.
Table III-3  Mode Share for Workers in Census Tracts 4028 and 4029

<table>
<thead>
<tr>
<th>Travel Mode</th>
<th>Census 2006-2010</th>
<th>CHTS 2012-2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auto</td>
<td>65%</td>
<td>31%</td>
</tr>
<tr>
<td>Transit</td>
<td>29%</td>
<td>57%</td>
</tr>
<tr>
<td>Bike</td>
<td>2%</td>
<td>10%</td>
</tr>
<tr>
<td>Walk</td>
<td>4%</td>
<td>3%</td>
</tr>
</tbody>
</table>


As shown in Table III-4, using the most aggressive (i.e., lowest) automobile mode share assumption, 31 percent of worker trips, the project would generate a parking demand for 2,437 parking spaces. The project would provide a 1,750-parking space garage and include parking supply to replace the existing 336-space public parking garage, 24 existing on-street parking spaces removed by the project, and provide 1,390 net new parking spaces for the project. Even with this revised analysis the project’s demand for parking, 2,437 parking spaces, would substantially exceed the supply of 1,390 new parking spaces provided by the project. The project’s limited parking supply would constrain vehicle trips and therefore constrain vehicle miles traveled and greenhouse gas emissions.
### TABLE III-4 PARKING DEMAND ESTIMATE (MAXIMUM OFFICE SCENARIO)

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size</th>
<th>Unit</th>
<th>Parking Rate per Unit</th>
<th>Demand</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>87 KSF</td>
<td></td>
<td>0.79&lt;sup&gt;b&lt;/sup&gt;</td>
<td>69</td>
</tr>
<tr>
<td>Community Space</td>
<td>0 KSF</td>
<td></td>
<td>0.00&lt;sup&gt;c&lt;/sup&gt;</td>
<td>0</td>
</tr>
<tr>
<td>Office</td>
<td>2,689 KSF</td>
<td></td>
<td>0.88&lt;sup&gt;d&lt;/sup&gt;</td>
<td>2,368</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
<td>2,437</td>
</tr>
<tr>
<td><strong>Current Site Parking</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Garage Parking</td>
<td></td>
<td></td>
<td></td>
<td>336</td>
</tr>
<tr>
<td>On-Street Parking</td>
<td></td>
<td></td>
<td></td>
<td>24</td>
</tr>
<tr>
<td><strong>Total Demand</strong></td>
<td></td>
<td></td>
<td></td>
<td>2,797</td>
</tr>
<tr>
<td><strong>Proposed Parking Supply</strong></td>
<td></td>
<td></td>
<td></td>
<td>1,750</td>
</tr>
<tr>
<td><strong>Parking Deficit</strong></td>
<td></td>
<td></td>
<td></td>
<td>1,047</td>
</tr>
</tbody>
</table>

<sup>a</sup> DU = Dwelling Unit; KSF = 1,000 square-feet

<sup>b</sup> Based ITE Parking Generation, 4th Edition land use category 820 (Shopping Center; non-Friday Weekday Non-December) and applying a 69% non-auto reduction from the 2012 California Travel Household Survey for the region bound by Grand Avenue, Lake Merritt/Alice Street, 14th Street, and Martin Luther King Jr. Way.

<sup>c</sup> Assuming all trips to land use are internal, and therefore do not demand additional parking.

<sup>d</sup> Based on ITE Parking Generation, 4th Edition land use category 701 (Office Building; weekday suburban) and applying a 69% non-auto reduction from the 2012 California Travel Household Survey for the region bound by Grand Avenue, Lake Merritt/Alice Street, 14th Street, and Martin Luther King Way.

<sup>e</sup> The proposed project will replace public parking one for one.


A similar exercise was completed for the two smaller development scenarios and Table III-5 documents the findings. As noted in the table both the All Office Scenario and the Residential/Office Mix Scenario provide more parking supply than the calculated parking demand if a more aggressive auto mode share of 31 percent of workers is used. For the All Office Scenario and the Residential/Office Mix Scenario the revised parking demand is less than the new parking supply and so the excess parking supply could induce more vehicle travel and associated greenhouse gas emissions.
### Table III-5 Parking Characteristics – Development Scenarios and Mode Share Assumption Comparison

<table>
<thead>
<tr>
<th>Development Scenario</th>
<th>Parking Demand (high mode share)</th>
<th>Parking Demand (low mode share)</th>
<th>New Parking Supply</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Maximum Office</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.689 ksf office</td>
<td>4,479</td>
<td>2,437</td>
<td>1,390</td>
</tr>
<tr>
<td>87 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>All Office</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1,450 ksf office</td>
<td>2,465</td>
<td>1,340</td>
<td>1,690</td>
</tr>
<tr>
<td>80 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22.79 ksf community</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Residential/Office Mix</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>880 ksf office</td>
<td>1,785</td>
<td>1,061</td>
<td>1,390</td>
</tr>
<tr>
<td>85 ksf retail</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18.5 ksf community</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>395 units residential</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*a* Parking demand calculated using methodologies in the Draft EIR i.e., 57 percent of trips are via automobile.

*b* Parking demand calculated using the most aggressive automobile mode share i.e., 31 percent of trips are via automobile.


**Response A4-4.**

The project’s parking supply is about 30 percent of the estimated parking demand for the Maximum Office Scenario (see Response A4-2). In addition, the project’s parking supply is about 25 percent of the maximum allowable parking per the city’s code (see Response A4-2). Lastly, using revised assumptions specific to Census Tracts 4028 and 4029 in downtown Oakland within ¼ mile of a BART station, the project’s parking supply is about 57 percent of the estimated parking demand for similar projects within ¼ mile of BART (see Response A4-3). In each instance, the project’s limited parking supply would constrain vehicle trips and therefore constrain vehicle miles traveled and greenhouse gas emissions.

The All Office Scenario parking supply is about 69 percent of the estimated parking demand (see Response A4-2) and about 55 percent of the maximum allowed by code. The Residential/Office Mix Scenario is similar with its parking supply at about 78 percent of the estimated parking demand and about 75 percent of the maximum allowed code. In each instance, the project’s limited parking supply would constrain...
vehicle trips and therefore constrain vehicle miles traveled and greenhouse gas emissions.

Additional analysis was completed to determine whether the excess parking supply generated by the All Office and the Residential/Office Mix Scenarios under the aggressive mode share assumption would generate VMT exceeding CEQA thresholds. Table III-6 presents the VMT per worker calculations assuming the most aggressive auto mode share (i.e., 31 percent trips by automobile). The project would cause substantial additional VMT if it exceeds the existing regional VMT per worker minus 15 percent.

As described in the Draft EIR (Table V.C-11, Page 242), the project is located in an area estimated to generate 12.5 VMT per worker in Year 2020 and 10.6 VMT in 2040. The VMT assessment completed for the Draft EIR was intended as a screening analysis that identified the project site as a low-VMT generating Traffic Analysis Zone (TAZ). The reported VMT per worker for the TAZ (Table V.C-11) does not necessarily represent the VMT per worker for a particular development. However, considering that the proposed project would have a higher density, better or similar access to transit, similar uses, be located in a similar setting as the rest of the TAZ, the proposed project is expected to have a similar VMT per worker as the TAZ. In addition, note that the MTC Model, which was used to estimate the VMT per worker in the Draft EIR, does not directly account for parking supply and how it would affect VMT. However, the discussion below addresses the effects of parking supply on VMT per worker for the proposed project.

The All Office Scenario would provide 26 percent more parking supply than parking demand at the most aggressive automobile mode share assumption, and as a result would generate 26 percent more VMT per worker. In Year 2020 this would represent 15.8 VMT per worker as compared to the VMT threshold of 18.5. By 2040, the All Office Scenario would generate 13.4 VMT per worker which is below the 17.3 VMT threshold for 2040. Accordingly, the potential excess parking supply with the All Office Scenario would not trigger a CEQA impact related to VMT.

The Residential/Office Mix Scenario would provide 31 percent more parking supply than parking demand under the aggressive mode share assumption, and as a result would generate 31 percent more VMT per worker. In Year 2020, this would represent 16.4 VMT per
worker while the VMT threshold is 18.5. By 2040 the Residential/Office Mix Scenario would generate 13.9 VMT per worker which is below the 17.3 VMT threshold. Accordingly, the potential excess parking supply with the Residential/Office Mix Scenario would not trigger a CEQA impact related to VMT.

Table III-6 also provides the upper limit parking supply for the All Office Scenario and the Residential/Office Mix Scenario. The upper limit parking supply was calculated by increasing the parking supply until the VMT per worker for each alternative matched the CEQA threshold of 18.5 VMT per worker in 2020 and 17.3 in 2040. The All Office Scenario could provide up to 1,983 net new parking spaces before triggering a VMT impact in 2020 and up to 2,187 spaces in 2040 before triggering an impact. The Residential/Office Mix Scenario could provide up to 1,570 parking spaces in 2020 and up to 1,732 spaces in 2040 before triggering a VMT impact.

**Table III-6 Vehicle Miles Traveled (VMT) Per Worker**

<table>
<thead>
<tr>
<th>Year 2020</th>
<th>Year 2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Office</td>
<td>Residential/Office Mix</td>
</tr>
<tr>
<td>Parking Demand</td>
<td>1,340</td>
</tr>
<tr>
<td>Parking Supply</td>
<td>1,690</td>
</tr>
<tr>
<td>Project VMT</td>
<td>15.8</td>
</tr>
<tr>
<td>VMT Threshold</td>
<td>18.5</td>
</tr>
<tr>
<td>Maximum Parking Supply Before VMT Impact</td>
<td>1,983</td>
</tr>
</tbody>
</table>

*Parking demand calculated using the most aggressive automobile mode share (i.e., 31 percent of trips are via automobile).

Under Public Resources Code, Section 21099(b)(3), alleged parking impacts of a project shall not support a finding of significance under
CEQA. The project’s potential impacts related to air quality, noise, safety, and any other transportation impacts have been adequately studied in the Draft EIR.
February 6, 2018

Peterson Z. Vollman  
City of Oakland  
250 Frank H. Ogawa Plaza, Suite 3315  
Oakland, CA 94612

Subject: Eastline Project - 2100 Telegraph  
SCH#: 2016122009

Dear Peterson Z. Vollman:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 5, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse
### Lead Agency Contact

<table>
<thead>
<tr>
<th>Name</th>
<th>Peterson Z. Vollman</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency</td>
<td>City of Oakland</td>
</tr>
<tr>
<td>Phone</td>
<td>(510) 238-6167</td>
</tr>
<tr>
<td>Fax</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:pvollmann@oaklandnet.com">pvollmann@oaklandnet.com</a></td>
</tr>
<tr>
<td>Address</td>
<td>250 Frank H. Ogawa Plaza, Suite 3315</td>
</tr>
<tr>
<td>City</td>
<td>Oakland</td>
</tr>
<tr>
<td>State</td>
<td>CA</td>
</tr>
<tr>
<td>Zip</td>
<td>94612</td>
</tr>
</tbody>
</table>

### Project Location

<table>
<thead>
<tr>
<th>County</th>
<th>Alameda</th>
</tr>
</thead>
<tbody>
<tr>
<td>City</td>
<td>Oakland</td>
</tr>
<tr>
<td>Region</td>
<td></td>
</tr>
<tr>
<td>Lat / Long</td>
<td></td>
</tr>
<tr>
<td>Cross Streets</td>
<td>Telegraph Ave, Broadway, 21st St, 22nd St</td>
</tr>
<tr>
<td>Parcel No.</td>
<td>008-0648-001-00, -011-03, -016-03, -018-00, -017-00</td>
</tr>
</tbody>
</table>

### Proximity to:

- **Highways**: I-880, 580, 880, SR 24
- **Airports**: 
- **Railways**: 
- **Waterways**: Lake Merritt, Lake Merritt Channel, Oakland Inner Harbor
- **Schools**: 
- **Land Use**: central business district/central bus dist pedestrian retail commercial zone

### Project Issues

- Traffic/Circulation; Air Quality; Water Quality; Noise; Aesthetic/Visual; Public Services;
- Archaeologic-Historic; Geologic/Seismic; Recreation/Parks; Sewer Capacity; Solid Waste;
- Toxic/Hazardous; Landuse; Cumulative Effects

### Reviewing Agencies

- Resources Agency; Department of Fish and Wildlife, Region 3; Office of Historic Preservation;
- Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission;
- Department of Water Resources; California Highway Patrol; Caltrans, District 4; Department of Housing and Community Development; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission

### Date Received
- 12/22/2017

### Start of Review
- 12/22/2017

### End of Review
- 02/05/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.
LETTER A5
State of California Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
February 6, 2018

Response A5-1. The comment acknowledges receipt of the Draft EIR by the State of California Governor’s Office of Planning and Research and that no state agencies submitted comments by February 5, 2018, the close of the comment period. The comment does not address the adequacy of the Draft EIR. No additional response is necessary.
B. INDIVIDUALS AND ORGANIZATIONS
January 22, 2018

By electronic transmission

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

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

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

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

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

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

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

4. Shadow studies should include all of the adjoining historic buildings and areas, such as Oakland Uptown Art and Entertainment District API, Cathedral District API, and the 25th Street Garage District
ASI, not just one window of the First Baptist Church. We are unclear as to why the apparently significant shadow on the 22nd Street plaza is considered negligible, and suggest that it should be mitigated. While it is claimed that four trees would “absorb” the shadow, an unaddressed consideration is whether the extant landscaping and people’s ability to use this small area would suffer from decreased light and increased wind. This issue isn’t addressed. In practice, afternoon use of this plaza is dependent upon its being warm enough to sit there, so sunlight and wind effects upon it affect its usability. We object to the decision to consider the impact insignificant and eschew mitigation.

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

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

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

- Downtown development should be visually interesting, harmonize with its surrounding respecting and enhance important views in and of the downtown, respect the character, history, and pedestrian-orientation of the downtown, and contribute to an attractive skyline. (Policy D2.1 Enhancing the Downtown)

- Housing in the downtown should be safe and attractive, of high quality design, and respect the downtown’s distinct neighborhoods and its history. (Policy D10.5 Design Housing)

- Commercial development should be designed in a manner that is sensitive to surrounding residential uses. (Policy N1.5 Designing Commercial Development)

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

Sincerely,

Alison Finlay
President
Oakland Heritage Alliance
LETTER B1
Oakland Heritage Alliance
Alison Finlay, President
January 22, 2018

Response B1-1. This comment is noted; however, it pertains to the design of the project and not to the adequacy of the Draft EIR. As further discussed in Response B1-3, the project would not materially impair either directly or indirectly any of the immediately adjacent or nearby historic resources. The massing and scale of the project will be addressed in the design review process which includes public hearings and opportunities for the public to comment.

Response B1-2. See the revised Appendix B Historic Resource Analysis, April 2018. Information on Matthew Fox’s association with the Sherman Clay building and additional information on alterations to the building have been added to the revised Appendix B Historic Resource Analysis. Photographs of the Sherman Clay building in the collection of the Oakland Cultural Heritage Survey dating to the mid to late 1980s show the screen on the upper story of building and do not show the mosaic at the Broadway elevation.

Response B1-3. See Response A1-3. CEQA Public Resources Code Section 21084.1 provides that any project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Public Resources Code Section 5020.1(q) defines “substantial adverse change” as demolition, destruction, relocation, or alteration such that the significance of the historical resource would be impaired. According to Public Resources Code Section 5024.1, a historical resource is a resource that is listed in, or determined to be eligible for listing in the California Register of Historical Resources; included in a local register of historical resources; or is identified as significant in a historic resource survey if that survey meets specified criteria.

Based on research conducted for this current historic evaluation, only one building on the project site would be considered an historic resource under CEQA, the former Kwik Way at 2150 Telegraph Avenue/495 22nd Street. The proposed demolition of this building was determined to be a significant and unavoidable impact. While there are additional known historic resources adjacent to and in the vicinity
of the project site, the proposed project at 2100 Telegraph Avenue in Downtown Oakland would not result in “substantial adverse change” in the significance of any known immediately adjacent or nearby historic resources. The proposed project would not materially impair either directly or indirectly any of the immediately adjacent or nearby historic resources. While the proposed project is a larger scale and mass and is taller than the existing building stock surrounding the site, the proposed height of the building is allowed under the current zoning of the site. Although the building would likely cast shadows on nearby historic resources, the extent of the shadows would not render those historic resources ineligible for inclusion in any federal, state or local registers.

The construction of the proposed new building near designated historic resources would not impair either individually significant or historic district contributors such that the significance of these resources would be materially impaired. While the proposed project would include new construction located adjacent to individually significant historic resources and near, but not within the boundaries of historic districts, it would not result in the removal of any character-defining features of the nearby historic districts or result in any direct or indirect impacts to historic resources.

Response B1-4.

See Response A1-7. The Draft EIR analyzes shade and shadow impacts to Franklin Plaza (referred to as 22nd Street Plaza by the commenter) on pages 449 through 451. In addition, Appendix E includes shading diagrams for all development scenarios. According to the City of Oakland’s CEQA Thresholds of Significance, the project would have a significant impact on the environment if it would, “cast shadow that substantially impairs the beneficial use of any public or quasi-public park, lawn, garden, or open space.” Under the Residential/Office Mix Scenario and All Office Scenario, the majority of the western half of the plaza would experience project-generated shadow in the later afternoon/evening year-round. Under the Maximum Residential Scenario and Maximum Office Scenario, the entire plaza would experience project-generated shadow in the later afternoon/evening during summer months, with smaller amounts of shading occurring in the western half of the plaza year-round. Although there are only two trees directly in the plaza area (and two along the street on Broadway), they provide some existing shade. Similarly, existing buildings behind the plaza also cast existing shadows in the morning year-round. Given the primary purpose of the plaza is to provide outdoor seating to adjacent restaurants, project-generated shadow
would not be considered a substantial impairment to the beneficial use of Franklin Plaza.

**Response B1-5.** See Response B1-1.

**Response B1-6.** See Response A2-3.
February 5, 2018

By electronic transmission

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

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

Please accept these additional comments to our previous letter. Upon further review we would like to add:

Oakland Heritage Alliance requests that the project design be revised, and an alternative presented, which takes into better account the valuable historic buildings along Broadway on both sides of the proposed project.

In particular, we are concerned about the relationship of the project to the Breuner's Building, to which it presents loading docks and driveways, rather than a coordinated and sensitive northern face. On the other end, as mentioned in our letter, better consideration ought to be given to the proximity of the Paramount. Note in the renderings that the building appears to protrude further toward the sidewalk than these two buildings. Rather, it should step back a little. The goal should be to make these two significant historic buildings visible from up and down Broadway, and to subordinate the new structure a bit, despite its massive size.

We'd suggest that a design which, while retaining all the square footage now proposed, would pull the project in a bit at the corners of 21st and 22nd streets, and which puts pedestrian-friendly uses along both these streets. The project should not turn its back on these distinguished neighbors.

Additionally, we'd point out that high wind plus shadow may render Franklin Plaza considerably less pleasant. While the DEIR mentions four trees as creating shadows today, actually only two do, the two in the plaza itself. The other two are street trees, deciduous, and don't block much sunlight today. If we are to give up on the usability of this plaza, ample equivalent outdoor public space, usable by anyone, should be required of the developer.

We request additional study of the shadow situation, and the wind effects, at this plaza.

Sincerely,

Alison Finlay
for Oakland Heritage Alliance
LETTER B2
Oakland Heritage Alliance
Alison Finlay, President
February 5, 2018


Response B2-2. See Response B1-4. The Draft EIR analyzes wind impacts on pages 452 through 454 and the wind study is included in Appendix E. The wind hazard criterion would not be exceeded at any locations near Franklin Plaza. In addition, most of the development scenarios result in less windy conditions in Franklin Plaza.
Dear Mr. Vollmann, commissioners, and board members:

I urge you to require a plan alternative that steps the Eastline project massing away from its neighbors--the Breuner Building and the Paramount Theatre--and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,
June Brumer
33 Linda Ave.,#1901
Oakland 94611
LETTER B3
June Brumer
January 29, 2018

Response B3-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, Commissioners & Board members:

My wife and I are 35+ year Oakland residents. We strongly urge you to require a plan alternative that steps the “massing” of the proposed Eastline project away from its neighbors—namely, the Breuner Building and Paramount Theatre—and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway. This is one of the most visually important, central blocks in the downtown Oakland area and there are no ‘second chances’ if a bad design is built.

In that regards, we fully support Oakland Heritage Alliance’s comments on this project.

Sincerely yours,

Matthew & Jane Gabel

1018 Sunnyhills Rd.
Oakland, CA 94610-2417
LETTER B4
Matthew & Jane Gabel
January 29, 2018

Response B4-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

I urge you to require a plan alternative that steps the Eastline project massing away from its neighbors--the Breuner Building and the Paramount Theatre--and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway. Many of the newly constructed residential buildings in the Uptown area have minimal offstreet parking provided for tenants. This shortsighted planning will only compound the congestion created by large projects like Eastline.

I support Oakland Heritage Alliance comments on this project.

Sincerely,
Jeffrey Hill
LETTER B5
Jeffrey Hill
January 29, 2018

Response B5-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

We urge you to require a plan alternative that steps the Eastline project massing away from its neighbors—the Breuner Building and the Paramount Theatre—and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,
Katherine W Jarrett, Oakland, California
LETTER B6
Katherine W. Jarrett
January 29, 2018

Response B6-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

We urge you to require a plan alternative that steps the Eastline project massing away from its neighbors—the Breuner Building and the Paramount Theatre—and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,

Katherine W Jarrett, Oakland, California

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I'm concerned that the Eastline project will not feature as much housing as possible. Am am not concerned about how high it is. Let them build it as tall as they want. I'm concerned about our housing crisis and building more housing is the only solution to that.

I'm a long time resident of Oakland that has been active in local politics for a long time. Thanks for hearing me out.

-tommaso Sciortino
LETTER B7
Tommaso Sciortino
January 29, 2018

Response B7-1. This comment is noted; it pertains to the preferred land use type for the project (housing) and not to the adequacy of the Draft EIR. No further response is necessary.
Dear Mr. Vollmann, board members, and commissioners,

I urge you to demand an alternative plan that moves the massing of the Eastline project away from its neighbors -- the Paramount Theatre and the Breuner Building -- and venerates the architecturally and historically significant First Baptist Church, as well as nearby historic buildings and districts.

The new project, despite its size, should be subsidiary to the important iconic buildings and should allow these historic Oakland assets to be discernible from a distance, especially from up and down Broadway.

I agree with and support the Oakland Heritage Alliance comments on this project.

Sincerely,
Sara Wynne

988 Franklin St #1305
Oakland, CA  94607
LETTER B8
Sara Wynne
January 29, 2018

Response B8-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members,

I urge you to require a plan alternative that steps the Eastline project massing away from its neighbors--the Bruener Building and the Paramount Theatre -- and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The Eastline project requires design attributes clearly in keeping with the Art Deco quarter of Downtown Oakland in which it will be located.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,

Dr. Janice W Yager PhD, MPH, CLS
LETTER B9
Dr. Janice W. Yager
January 29, 2018

Response B9-1. See Responses B1-1 and B1-3.
Dear Sirs,

I am a member of Oakland Heritage Alliance and subscribe to their interests. They have brought forward a concern about the Eastline project and I am responding to this concern. A main concern is to make a plan that steps the Eastline project massing away from its neighbors and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings. Your project, even with its large size, should be subordinate to the key historic structures and allow the iconic Oakland treasures to be visible from a distance, especially from up and down Broadway.

Sincerely,

Jeanne Dunn
LETTER B10
Jeanne Dunn
January 29, 2018

Response B10-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

We urge you to require a plan alternative that steps the Eastline project massing away from its neighbors--the Breuner Building and the Paramount Theatre--and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,
Vivian Romero

Thanks,
Vivian
LETTER B11
Vivian Romero
January 30, 2018

Response B11-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

I have been a member of Oakland Heritage Alliance for many years. I support their mission, but I have never written a letter on their behalf before. With respect to the Eastline Project, however, I feel quite strongly that new building projects, which intermix with existing structures, must be scaled to respect those structures.

I am an ardent admirer of the beauty of the city of Paris, which has taken great pains to scale new buildings so that the result is still a harmonious whole, and old structures can still be appreciated in their entirety by passers-by. You may say that Oakland is not Paris. I respond, why not?

Sincerely,

Susan Sawyer
6457 Oakwood Drive
Oakland, CA 94611
LETTER B12
Susan Sawyer
January 30, 2018

Response B12-1. See Responses B1-1 and B1-3.
Dear Mr Vollmann, commissioners and board members--

Please do not allow the Eastline project. Certainly not without the approval of Oakland Heritage Alliance. I just want to cry when I see the Workforce Tower which has eaten up the San Francisco skyline! Who allowed the rampant development of San Francisco south of market. What a cheap overwhelming mass of over-tall buildings. And for the benefit of ordinary San Franciscans? Certainly not! Billionaires from Taiwan or Dubai or somewhere! You've crossed the bridge and noticed it! That development is just nauseating!

PLEASE do not be seduced into a similar huge building development in downtown Oakland!

I totally respect the advice and recommendations Oakland Heritage Alliance might give you. Their taste is impeccable!

Sincerely,

Mary Anne Urry
6292 Clive Ave.
Oakland, CA 94611

Sent from my iPhone
LETTER B13
Mary Anne Urry
January 30, 2018

Response B13-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, commissioners, and board members:

We urge you to require a plan alternative that steps the Eastline project massing away from its neighbors--the Breuner Building and the Paramount Theatre--and respects the historically and architecturally important First Baptist Church, as well as nearby historic districts and buildings.

The new project, despite its size, should be subordinate to the key historic structures and should allow these iconic Oakland treasures to be visible from a distance, particularly from up and down Broadway.

I support Oakland Heritage Alliance comments on this project.

Sincerely,

Edith Yhuel
LETTER B14
Edith Yhuel
January 30, 2018

Response B14-1. See Responses B1-1 and B1-3.
Dear Mr. Vollmann, Commissioners, and Board members:

The Eastline project is, at its current planned size and height, a major intrusion into an area blessed with architectural gems as well as other buildings at the 2-3 story heights characteristic of Oakland’s earlier days. These people-oriented structures have provided the area with a familiarity and sense of welcome which invite visitors and workers and which encourage networking and creativity -- community.

Much of the projected Eastline space has been empty a very long time. I appreciate the plan for a substantial residential component, and the community space.

But the Eastline will be a giant; whatever its benefits, it will be overwhelming.

The City and the developers must expend real effort to ensure that the Uptown’s classic Oakland remains visible and thriving.

Please insist that the Eastline plans be revised to provide sight lines and design features that honor Oakland’s best (the Paramount, First Baptist Church) and respect her more humble architectural heritage. Such a revision will, in fact, be in line with the Project’s objectives.

I support Oakland Heritage Alliance comments on this project.

Sincerely,

Elizabeth Callaway
LETTER B15
Elizabeth Callaway
January 30, 2018

Response B15-1. See Responses B1-1 and B1-3.
VIA HAND DELIVERY

Mr. Peterson Vollmann, City Planner
Planning and Building Department
City of Oakland
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612

Dear Mr. Vollmann:

Re: 2100 Telegraph Avenue Project (Eastline Project)

The Paramount Theatre wishes to express our concerns and cannot support the proposed Eastline Project as it relates to re-configuration and usage of 21st Street. As configured, the project will have an extreme negative impact on the use and operation of the Paramount Theatre. It will adversely impact and affect our ability to operate.

Paramount Theatre Board of Directors, management, and I.A.T.S.E. Local 107 Stagehand Union has met on a number of occasions with the team from Lane Partners, their consultants, and Strategic Urban Development Alliance (SUDA) to discuss the proposed development of the City-owned structure at 2100 Telegraph Avenue and surrounding parcels.

Throughout our dialogues, the Board, stagehands, and management remained hopeful that Lane Partners and SUDA would present a project design that would acknowledge and respect the operational challenges the 85-year old Paramount Theatre faces by not having a loading dock.

As corresponded to Lane Partners and SUDA, not having a loading dock means that artists and acts performing at the theatre have no choice but to load the shows in and out via the rollup Stage Door located on 21st Street, close to the Telegraph intersection. On event days and prior to events, show trucks (as many as four 48-foot or 52-foot semis) and buses (up to 11 full-size buses), along with many ancillary show-related vehicles typically arrive as early as 5:00 a.m., or in some cases, the night before, and don't depart until the early hours of the morning. As a result, the City has granted the Paramount Theatre the use of 21st Street between Telegraph Avenue and Broadway for parking of show-related vehicles.
As we continued to work with Lane Partners, their consultants and SUDA to resolve this issue and impact, we were unable to resolve the imposed condition per the design of their development. Several variations were proposed but did not solve the issue and the plan, as it exists today, will result in a high-risk injury to our Stagehands and complaints by our patrons and added operational cost. Furthermore, with decades of experience dealing with artists and acts, the Theatre will certainly lose a significant number of shows due to increased cost to operate and without close access to the Stage Door, many acts and artists will refuse to perform at the Theatre.

The challenges above pertain to the long-term effects of the 2100 Telegraph Avenue Project as it currently stands, notwithstanding the disruption to our patrons, acts and artists during the construction period, which will impact the Theatre’s operation for up to three or more years.

In addition, the current proposal does not meet the parking requirements of the Paramount Theatre. The public parking garage located at 2100 Telegraph Avenue will be demolished and this amenity that provides 327 parking stalls that Theatre patrons depend on will not be replaced. We are a 3040 seat facility. Even though many of our patrons use public transportation, hundreds drive long distances that are not accessible by public transportation to attend events at the Paramount. Without adequate access to future parking, the Paramount’s operation will be severely and negatively impacted.

While the board, management, and stagehands stand firm in their disapproval to the current project as it adversely affects the Theatre, we stand in favor of a project that will complement the City of Oakland, the Paramount Theatre and its operation.

Currently, The Theatre’s future viability as a treasured Performing Arts venue in Oakland is in jeopardy. We request that the 21st Street usage and traffic be reconfigured so that it eliminates or minimizes the adverse impacts on the Paramount Theatre in its operations.

Sincerely,

Leslee Stewart  
General Manager  
Paramount Theatre

Yurt Dreyer  
I.A.T.S.E. Local 107

Jean Rainer  
President, Board of Directors  
Paramount Theatre
LETTER B16
Paramount Theatre
Leslee Stewart, General Manager
February 5, 2018

Response B16-1. The comment relates to the configuration and usage of 21st Street but does not address the adequacy of the EIR. The City may consider these comments independent of the CEQA process.

Response B16-2. The comment relates to the Paramount Theatre loading operations but does not address the adequacy of the EIR. The City may consider these comments independent of the CEQA process.

Response B16-3. The comment relates to the project not meeting the Paramount Theatre parking requirements because the existing parking garage on the site would be demolished but does not address the adequacy of the EIR. Note also that the project will include up to 1,750 parking stalls.

Response B16-4. The comment is supportive of a project that will complement the City of Oakland and the Paramount Theatre as well as its operations. The City may consider these comments independent of the CEQA process.
C. PLANNING COMMISSION AND PUBLIC HEARING COMMENTS

A Public Hearing on the Draft EIR was held before the Planning Commission on January 24, 2018. There were no comments regarding the EIR from the public nor the commissioners. A Public Hearing on the Draft EIR was also held before the Landmarks Preservation Advisory Board (LPAB) on February 5, 2018. A total of three comments were provided by the public and four comments were provided by board members. The following provides a summary of the comments and responses to the comments that are relevant to the EIR.
Landmarks Preservation Advisory Board Comment Summary
February 5, 2018

Naomi Schiff
- How can the Draft EIR study impacts on historic resources without studying adjoining buildings? What about the Breuner building, First Baptist Church, and the Paramount? The massing should reflect valuable historic buildings in Oakland. The Draft EIR should study another alternative that looks at the massing, and how it should step back further from its neighbors.
- The Paramount is worried about the loading options and this should be addressed.
- The Draft EIR should also look at shadow impacts. The four trees in Franklin Plaza do not account for shading on plaza. The combined wind and shadow impacts will be more than what the Draft EIR acknowledges. Somewhere equally sunnier and pleasant should be provided if there is a loss of sunlight at Franklin Plaza.

Daniel Levy
- The mitigation measure language related to relocation of the Kwik Way could be clarified and strengthened. What would make relocation feasible or not feasible?
- The Developer should commit to relocating the Kwik Way. This would improve the mitigation measure.

Riley Doty
- The best vantage point of the colorful historic ceramic facades in Oakland is across Broadway looking at Paramount Theater.
- Oakland has an exceptional collection of these Art Deco buildings with colorful terra cotta. A viewpoint of three contributing buildings is not found elsewhere.
- These are special buildings that deserve special care.

Board Member Vince Sugrue
- Thanks to the OHA for their comment letter. The report was deficient and dismissive. The area is changing by the month and more research would be valuable.

Board Member Nenna Joiner
- We are still early in design process, but the Board is looking forward to seeing future plans.
- Is there a way to move the Kwik Way to Mosswood neighborhood or for the City to utilize elsewhere?

Board Member Christopher Andrews
- Agrees with the OHA letter. The height of the building on Broadway should be sensitive to adjacent special buildings (the Paramount and Breuner building). He hopes the designers are looking at the surrounding buildings and rising up to the occasion.

Board Member Peter Birkholz
- Are demolition findings needed for the Kwik Way?
• There should be a glare study. All of the lighting from the proposed project could go somewhere south-facing and obscure the Paramount marquee during day hours.

• It would be great if the Draft EIR more clearly stated what makes relocation feasible or not. It seems like Kwik Way would be easy to relocate but is there a site nearby available? Perhaps it could be moved to a temporary site near the Fox Theater? It would be helpful to have an economic analysis prepared to give a rough idea of where it makes sense to relocate based on market conditions.
Response C1-1. See Responses B1-1 and B1-3.

Response C1-2. See Response B16-2.


Response C1-4. As stated on page 192 of the Draft EIR, Mitigation Measure HIST-1d requires commitment from the applicant to make funds available for relocating the former Kwik Way. Relocation is feasible if an individual or groups is interested in relocating the Kwik Way building. Mitigation Measure HIST-1d follows the City of Oakland's past practice which requires the applicant to make the façade improvement fee as well as the demolition cost available for relocating the building or salvaging elements of the building.

Response C1-5. See Response A2-3.

Response C1-6. See the Revised Appendix B Historic Resource Analysis, April 2018 in Attachment A of Chapter IV, Text Revisions.

Response C1-7. See Response B1-1.

Response C1-8. See Response C1-4.


Response C1-10. The former Kwik Way does not fall under any of the City of Oakland’s three categories of historic structures; therefore, demolition findings are not required.

Response C1-11. The project would use glass with a low-reflectivity factor to prevent excess glare to adjacent buildings.

Response C1-12. See Response C1-4.
IV. TEXT REVISIONS

This RTC document presents specific revisions to the text of the Draft EIR that were initiated by City staff for the purpose of clarifying material in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are noted, followed by the appropriate revision. Added text is indicated with underlined text. Deletions to text in the Draft EIR are shown with strikeouts. Page numbers correspond to the page numbers of the Draft EIR. Revisions presented in this RTC document do not significantly alter the conclusions or findings of the Draft EIR.

Page 221, Section g(1) Planned Transit Changes, is revised to add the following paragraph:

BART has several funded expansion projects that will further enhance the transit experience to and from the project site. The 19th Street Station Modernization improvements generally include additional fare gate capacity, a new north end elevator, additional bicycle parking within the station area, and other capacity and access improvements. In addition, BART is constructing two extensions that will extend the reach of BART in the Bay Area, including the extension along the Highway 4 corridor in East Contra Costa County to Antioch and the Silicon Valley extension to San Jose. These extensions are incorporated into the Alameda CTC travel demand model which was used to generate traffic forecasts for air quality and noise analyses in the published Draft EIR.

APPENDICES

Add a revised Historical Resources Analysis Appendix B prepared in April 2018.

ATTACHMENT A: Appendix B: Revised Historical Resources Analysis
ATTACHMENT A: Appendix B Historic Resource Analysis, April 2018
APPENDIX B: HISTORIC RESOURCE ANALYSIS

Completed by: Bridget Maley, architecture + history, llc, with contributions from Shayne Watson, Watson Heritage Consulting, and Mark Hulbert, Preservation Architecture

I. INTRODUCTION

The following appendix was developed by architecture + history, llc in collaboration with Watson Heritage Consulting and Preservation Architecture. LSA is completing the archaeological analysis and the Historic and Cultural Resources chapter for the project DEIR. This appendix describes the conditions for above ground older and historic resources within or adjacent to the Eastline Project site at 2100 Telegraph in downtown Oakland, California. The purpose of this appendix is to: 1) develop current evaluations of historic resources on the project site; and 2) describe the baseline conditions for historic resources, including past survey evaluation information, within an approximate two block vicinity of the project site and its general surroundings which are urban in character. This effort only discusses above ground, built resources.

Historic architectural resources consist of existing buildings, structures, objects, sites and historic districts that are historically significant or previously designated at the local, State, or Federal level. These resources may display their significance for an association with an important person or notable events in American, California or local history; or, may be significant for their expression of a certain type or style of construction or architectural craftsmanship. Resources may be significant if, under the California Register criteria guidelines, sufficient time has passed to obtain a scholarly perspective on the events or individuals associated with the resource. Under the National Register criteria, properties less than 50 years in age must demonstrate “exceptional significance” at the local, state or federal level.

For the purposes of CEQA historic resources are generally defined as resources that are listed in, or determined to be eligible for listing in the California Register of Historical Resources previously or through a current evaluation; included in a local register of historical resources; or have been identified as significant in a historic resource survey, if that survey meets specified criteria. The following appendix to the Eastline Project - 2100 Telegraph EIR includes information on both previously identified historic resource and historic resources specifically evaluated for this project.
II. EVALUATION CRITERIA - CALIFORNIA REGISTER OF HISTORICAL RESOURCES

Under that California Environmental Quality Act (CEQA) resources that meet the criteria of the California Register of Historical Resources are considered historical resources for the purposes of CEQA. Determinations of historical significance require that several factors are considered including: the property’s history (both construction and use); the history and context of the surrounding community; an association with important persons or uses; the number of resources associated with the property; the potential for the resources to be the work of a master architect, builder, craftsman, landscape gardener, or artist; the historical, architectural or landscape influences that have shaped the property’s design and its pattern of use; and alterations that have taken place, and lastly how these changes may have affected the property’s historical integrity.

These issues must be explored thoroughly before a final determination of significance can be established. To be eligible for the California Register historic resources must possess both historic significance and retain historic integrity. The following are the four significance criteria of the California Register. Upon review of the criteria, if historic significance is identified, then the level of historic integrity must be assessed. To be eligible for the California Register, an historical resource must be significant at the local, state, or national level under at least ONE of the following four criteria:

Criterion 1: Event or Patterns of Events
It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2: Important Person(s)
It is associated with the lives of persons important to local, California, or national history.

Criterion 3: Design/Construction/Architecture
It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

Criterion 4: Information Potential
It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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¹ Note: Information potential is not discussed in this report.
Historic Integrity
For resources to be eligible for the California Register they must possess both historic significance and retain historic integrity. There are seven aspects of historic integrity: location, design, setting, materials, workmanship, feeling and association.

Historic District
Resources can be eligible for the California Register individually as buildings, structures, objects or sites, or they can be eligible as a collection or cluster of historic resources within an historic district. Districts are defined as a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

Exceptional Significance
Generally, resources that are not yet 50 years in age must possess exceptional significance to be individually important. The California Register guidelines state that in order for a historic resource to achieve significance within the past 50-years, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource.
III. SUMMARY HISTORIC DOWNTOWN OAKLAND DEVELOPMENT

The project site is within lands that once were part of the Rancho San Antonio granted to Luis Maria Peralta for his service to the Spanish government. The over 40,000-acre rancho included the present-day cities of Oakland, Berkeley, Alameda, and parts of San Leandro and Piedmont. Peralta’s grant was confirmed after Mexico gained independence from Spain in 1822, and the United States honored the land title when California entered the Union in 1848. Soon after, squatters had begun to use portions of Peralta’s undeveloped lands. The Gold Rush and subsequent statehood brought miners, businessmen, lumbermen and other speculators to Northern California. Early settlers to the area that became Oakland include Edson Adams, Andrew Moon, and Horace Carpentier, who set up camp on what had been Peralta lands. These trailblazers soon realized the area’s potential and engaged Jules Kellsersberger, a Swiss immigrant and former military engineer, to lay out a city, which was officially incorporated as Oakland in 1852.

Originally, Oakland encompassed the area roughly bordered by the estuary, Market Street, 14th Street and the Lake Merritt Channel. Broadway served as the “Main Street,” for the growing town. Early residents, numbering under one hundred, lived near the foot of Broadway close to the estuary. Development began moving toward the Oakland hills and ultimately eastward to what would become East Oakland.

Oakland’s size and population began to expand in 1869, when the city became the terminus of the Central Pacific Railroad. With an accessible harbor, Oakland was strategically located and easily accessible to inland agricultural products. A period of rapid population expansion and physical growth followed, including the establishment of civic and commercial buildings and improved infrastructure. By the turn of the twentieth century, Oakland was beginning to attract businesses and residents away from the more populous San Francisco. Then, the 1906 earthquake and devastating San Francisco fire resulted in refugees from the burned out city across the bay pouring into East Bay towns. By 1910, Oakland had population of 150,000, more than double the 67,000 individuals counted in 1900.

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Residential and commercial development in Oakland increased during the 1910s to further accommodate displaced San Francisco residents. A number of moderately priced hotels were constructed in downtown Oakland from 1910 and 1915 to house travelers coming to the Panama Pacific International Exposition (PPIE) hosted by San Francisco. This includes the Hotel Harrison, directly across the street from the project site, and a number of other hotels in the vicinity. Also during this period, older neighborhoods became more densely populated as new apartment buildings were constructed, shopping districts expanded, hotels for visitors to the increasingly popular city were developed, and new commercial centers began to take shape along busier thoroughfares. The post-earthquake development boom defined much of downtown Oakland, with a number of landmark skyscrapers and commercial buildings constructed during this era, including the Hotel Oakland, just across the street from the project site.

World War I also increased the number of industrial establishments in both downtown and along the waterfront, which in turn contributed to increased residential construction in
areas made more easily accessible by the increased popularity and use of the automobile. Downtown Oakland saw a great number of buildings constructed during the 1920s including many structures in the blocks that surround the project site, such as the Advertiser and the Pelton-Faustina Buildings, both situated along 13th Street adjacent to the project site.

The Great Depression of the 1930s followed the post-World War I prosperity of the 1920s. Like most of the country, Oakland fell into a period of financial instability in the 1930s, with little to no building occurring, especially downtown. Then with the preparations for and outset of World War II, Oakland entered an era of intense industrial, commercial and economic development. From 1940 to 1945, Oakland’s population increased by one third and by 1950, the population was nearly 385,000. The Port of Oakland became a major staging area for war operations in the Pacific and a center of wartime production of goods and materials. The economic impact of World War II on Oakland, and indeed the entire Bay Area, was significant, with effects felt in almost every sector and by the increasingly diverse communities represented in Oakland. Post War commercial building in downtown Oakland was fairly steady from the late 1940s into the early 1960s.

In the latter 1950s, a large number of the parcels along Oakland’s 20th Street, from Broadway to Harrison Street, transitioned from earlier institutional, residential and automotive uses to commercial use. During the 1960s and 1970s, a relatively large number of the parcels surrounding the intersection of 20th and Franklin streets were bank owned and a cluster of branch bank buildings developed in the immediate vicinity.

In this same period, likely spurring the transition to these commercial uses, the Bay Area Rapid Transit (BART) system was being developed under and would soon open along Broadway, including a 19th Street station with portals at Broadway at 17th, 19th and 20th streets.

Between 1950 and 1980, Oakland’s population steadily decreased, though it again rose in the 1980s. Shifts in the economy and changes in manufacturing methods left many empty warehouses and office buildings along Oakland’s waterfront and in the downtown area. In the late 1980s and 1990s, many of these buildings were reclaimed for office and residential uses.
IV. DEVELOPMENTAL HISTORY OF PROJECT SITE

This overview history of the area immediately surrounding the subject building was developed using Oakland Sanborn Fire Insurance Company maps dating from 1889, 1902, 1912, 1935, 1950, and 1970. Historical background in this section focuses on the subject block. The history of this area of Telegraph Avenue was somewhat difficult to trace because of major street reconfigurations (e.g., the construction of West Grand Avenue sometime between 1912 and 1935) and multiple changes to street names, block numbers, and addresses. These changes are noted throughout the following paragraphs.

1. 1889 Sanborn Map
Telegraph Avenue near downtown Oakland was a mix of residential, commercial, and industrial properties when the first Sanborn Fire Insurance Company map was produced for the area in 1889. The corner of Telegraph Avenue and 22nd Street (project site) contained four single-family residences, three outbuildings, and a large vacant lot to the south. The rest of the 2100 block contained mostly residences and a few commercial businesses facing Broadway.

The block to the south (2000 block today) housed single-family residences facing Telegraph, 21st Street, and Broadway. The southwest corner of the block was vacant. The block to the north of the project site (2200 block today) was comprised mostly of single-family residences. A wood and coal yard was located at the southwest corner, and a few commercial properties faced Telegraph Avenue.

Surrounding blocks were predominantly residential. Notable exceptions are the blocks near the south end of Telegraph Avenue (between 17th and 18th Streets), which featured a small commercial enclave comprised of two plumbers, a carpenter, two lumberyards, a Chinese laundry, and a milk and cream depot. The German M.E. (Methodist Episcopal) Church was located on 17th Street between San Pablo Avenue and Telegraph Avenue. The large Oakland Brewery complex was at Telegraph Avenue and 19th Street. Farther west, the Roman Catholic Cathedral of Saint Francis de Sales, completed in 1893, filled the corner of Grove and 21st Streets (Grove Street no longer exists).

2. 1902 Sanborn Map
Between 1889 and 1902, when Oakland’s second Sanborn Fire Insurance Company map was drawn, some street names had changed: New Broadway had become Broadway and 21st Street was named Hobart Street. Growth in the area continued, as some of the vacant lots were developed with residences and commercial buildings.

The 2100 block (subject block) was almost fully developed. Single-family residences still existed at the corner of Telegraph Avenue and 22nd Street (project site). To the immediate south, a large, two-story building with commercial storefronts and lodging on the second

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1 Note: Sanborn maps showing the west side of Telegraph Avenue in 1889 are not available online.
floor had been constructed. On parcels facing 21st Street, single-family residences had been constructed. On the west side of the 2100 block, the buildings facing Telegraph Avenue were residential: a pair of two-story buildings at the corner of 22nd Street with two flats each and rounded bay windows; a single-family dwelling at the corner of 20th Street; and a mostly empty lot in between with a water tank and a windmill.

The west side of the 2200 block contained four single-family dwellings. The east side retained its 1889 configuration, but a large wood and coal yard with multiple buildings and structures had been constructed at the southwest corner.

The east side of the 2200 block remained mostly the same since 1889. The wood and coal yard at the southwest corner had been replaced by a two-flat residential building. At the west side of the block, the southern half of the parcels were vacant and the northern half contained a large, two-story building containing flats.

The composition of surrounding blocks continued to be a mix of predominantly residential with scattered commercial and industrial properties.

3. 1912 Sanborn Map
The period between 1902 and 1912 saw significant changes to this area of Telegraph Avenue. While many of the properties survived the 1906 earthquake, some were either destroyed or replaced with new buildings. The most significant changes were related to infrastructure. The Southern Pacific Railroad laid rail tracks for its new electrical passenger lines, introduced in 1911, on 20th Street and Jones Street (now 22nd Street). These electrical lines were operated by a unit of Southern Pacific Railroad called the East Bay Electric Lines, which operated throughout the East Bay. Formerly the Oakland Cable Railway, Southern Pacific acquired the company in 1887. The Southern Pacific Electric lines ran to the Oakland 16th Street Station, completed in 1912, and the main Oakland station for the Southern Pacific East Bay Electric Lines. For many years it served as the terminus of the Transcontinental Railroad.

In 1902, the Key System introduced a new system of electric passenger lines and ferries. Between 1902 and 1912, one of those lines was laid on 22nd Street across Telegraph Avenue (the route that became West Grand Avenue). Half a block of buildings on the east side of Telegraph was demolished to create the terminus for that line. The line ended at a train shed that stretched from Valley Street west to Broadway. The Broadway side of the train shed featured an enormous, Tudor Revival complex called the Key Route Inn, which opened in 1907 and featured a Key System station, hotel, dining room, and a park. The rail line, however, continued, becoming the "B" transbay line upon the opening of the San Francisco–Oakland Bay Bridge railway. The rail line was replaced by the "B" bus route in April 1958, and was subsequently incorporated into the publicly owned AC Transit system.
At the corner of Telegraph Avenue and 22nd Street (project site), the three single-family residences that had stood there since at least 1889 were either destroyed or had been demolished. The large, two-story building with commercial storefronts and lodging on the second floor, which faced Telegraph Avenue, was extant. Businesses located in the building included a cabinet factory and upholstering company, Japanese laundry, and a plumber. In the middle of the block, the following buildings had been constructed: a single-family dwelling, a storefront, and a garage (all two stories) and a three-story, six-flat building, all facing 21st Street. On the Broadway side of the block, four single-family residences had been replaced by a three-story apartment building and a single-story commercial building. Added to the north side of the block, facing 22nd Street, were a two-story, two-flat residence, a plumber’s shop, and the Guernsey Farm Creamery.

At the west side of the 2100 block, single-family homes had been replaced by the four-story Young Men’s Christian Association (1909) at the corner of Telegraph Avenue and 21st Street and two buildings with flats facing Jones Street (now 22nd Street).

The east side of the 2000 block of Telegraph Avenue changed significantly between 1902 and 1912. The wood and coal yard at the southwest corner had been replaced by the Hotel Avalon, a three-story building with commercial storefronts on the ground floor and lodging units above. Single-family homes at the southeast corner (20th Street and Broadway) had been replaced with large commercial buildings (automobile garages and show rooms) and a single-family dwelling facing 20th Street. At the west side of the block, single-family homes—either destroyed by the 1906 earthquake or demolished—had been replaced by commercial storefronts and a single-family residence facing 20th Street.

At the west side of the 2200 block of Telegraph, at the corner of 21st Street, the First Baptist Church, designed by Julia Morgan, was constructed in 1903. At the east side of the block, a single-family residence at the center of the block facing Telegraph Avenue was demolished during construction of the Southern Pacific Railroad electric railway tracks, which terminated at a train shed at the east side of Valley Street. A few commercial buildings had been constructed and housed an upholstering shop, truss factory, and a plumber (all two stories).

4. **1935 Sanborn Map**

This area of Telegraph Avenue and Broadway experienced significant change between 1912 and 1935. The most substantive change was the extension of West Grand Avenue on the former Key System route on 22nd Street to Broadway, resulting in the demolition of a half block of buildings between Valley and Broadway. The 2000-2200 blocks on the east side of Telegraph Avenue, especially parcels facing Broadway, changed from a partially residential composition to a mix of commercial, industrial, and entertainment properties.

The east side of the 2100 block (subject block) contained most of the buildings extant in 1912. The corner of Telegraph Avenue and 22nd Street (subject property) was vacant. A gas station had been built at the corner of Telegraph Avenue and 21st Street. The Hobart
Garage, stretching across the center of the block from 21st Street to north to 22nd Street housed 200 cars. The parcels facing Broadway featured the Sherman & Clay store at the southeast corner and stores and restaurant buildings filling the rest of the lots.

The west side of the 2100 block of Telegraph remained unchanged since 1912.

At the east side of the 2000 block of Telegraph, the only building remaining from 1912 was the Hotel Avalon at the southeast corner. The Paramount Theatre, constructed in 1930, filled most of the east side of the block. Smaller commercial buildings had been constructed on parcels facing 20th Street and Broadway. At the west side of the block, the single-family residences that existed in 1912 had been demolished. In their stead were vacant parcels on the south side and small commercial buildings at the corner of Telegraph Avenue and 21st Street.

At the east side of the 2200 block, the residences and commercial buildings that filled the Telegraph Avenue-facing parcels had been demolished and replaced by a gas station at the corner of Telegraph Avenue and West Grand Avenue. The west side of the 2200 block of Telegraph was largely unchanged since 1912 with the exception of a new storefront building the northeast corner.

5. 1950 Sanborn Map
Very little change occurred on these three blocks of Telegraph between 1935 and 1950. The east and west sides of the 2100 block (subject block) remained the same. At the 2000 block, the only change was the addition of a bus depot at the west side of the block (corner of Telegraph Avenue and 20th Street). At the 2200 block, five residences at the east side had been demolished. That side of the block remained vacant.

6. 1970 Sanborn Map
The 2000-2200 blocks of Telegraph Avenue saw extensive change in the period between 1950 and 1970. On the 2100 block (subject block), the Kwik Way drive-in restaurant had been constructed at 2150 Telegraph Avenue. It was surrounded by parking areas and a commercial building at the northeast corner. Everything else on the block had been demolished. At the west side of the 2100 block, two residences at the northeast corner had been demolished and replaced with a used-car sales lot with a small office at the west side of parcel.

At the west side of the 2000 block, the commercial building at the northeast corner had been demolished and replaced with a larger commercial building (2025 Telegraph Avenue). At the east side, the building at the corner of Telegraph Avenue and 21st Street had been demolished and replaced by a bus station at 2040 Telegraph. Commercial buildings at the southwest and northeast corners (adjacent to the Paramount Theatre) had been demolished. The commercial building at 2022 Telegraph Avenue was extant. The vacant parcels were used for parking.
At the east side of the 2200 block, the gas station had been demolished and replaced with two single-story, corrugated-iron-sided structures. On the west side, the commercial buildings at the northeast corner had been demolished and replaced with a gas station at the corner of Telegraph Avenue and 22nd Street.
V. EXISTING BUILDINGS ON PROPOSED PROJECT SITE

This section includes discussion of the existing buildings on the proposed project site including:

- Space Burger (formerly Kwik Way); 2150 Telegraph Avenue/495 22nd Street
- Bank Building Vacant (formerly Security Pacific National Bank); 2101-15 Broadway
- Bank of the West (formerly Sanwa Bank); 2121-27 Broadway
- Sound Room (formerly Sherman Clay Building); 2135-47 Broadway
- Parking Garage; 2100 Telegraph

Map of project site (Source: Google Maps)
Aerial view of the project site showing surrounding historic resources
2150 Telegraph Avenue / 495 22nd St. (Kwik Way / Giant Burger)

Subject Parcel & Past Evaluation
2150 Telegraph Avenue (also known as 495 22nd Street) is a small, restaurant building situated between between 21st and 22nd Streets in Oakland’s Uptown District, constructed in 1953. The Assessor’s Parcel Number (APN) is 008064801103. The lot is 0.486 acres. The building is located within an CDB-P (Central Building District) zoning area.

The Oakland Cultural Heritage Survey (OCHS) has two different previous ratings on file for this property. First, on the Parcel Information Sheet on the City’s website it is noted as a *3, which means less than 45 years old when surveyed and not in an historic district. In 2003, the building had just turned 50 years old. The earlier survey rating was assigned before the building reached 50 years in age.

The Public Review Draft Uptown Mixed Use Project EIR, completed by LSA Associates in September 2003 (14 years ago), State Clearinghouse No. 200052070 noted that the OCHS rating was *c3. However, even though the building had reached 50 years in age it was not re-evaluated during the Draft EIR process.

However, on November 17, 2003, Sara E. Palmer of LSA Associates completed a preliminary historic evaluation of the building at 2150 Telegraph Avenue. Palmer concluded:

> Based on my review of the Kwik Way 2 building and the historic context for Googie architecture, it appears likely that the Kwik Way 2 building is eligible for listing on the California Register. It could also be considered a cultural resource by the City of Oakland.

> The Kwik Way 2 features the angled front windows, sloped roof, and brightly colored decorative elements characteristic of Googie drive-ins. It retains good historical integrity and it appears that the building could be readily restored to its original condition.⁴

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Today, the building is 64-years old which is considered sufficient time to have passed to obtain a scholarly perspective on the events or individuals associated with the resource for the California Register of Historical Resources. As such, architecture + history, llc evaluated the building in 2017 with the following findings.

**Current Architectural Description**
The building at 2150 Telegraph Avenue is a 2,115 square-foot, one-story restaurant located on the southeastern corner of Telegraph Avenue and 22nd Street in Oakland. It is situated in the middle of an irregularly-shaped parcel and is surrounded by an asphalt-paved parking lot. The property is accessed via vehicular curb cuts off of both Telegraph Avenue and 22nd Street.

The building sits on a concrete, slab-on-grade foundation and has two sections: a public section at the north (front) where food is served; and the utility section at the south (rear), which contains a kitchen, storage, and bathroom.

The front section is dominated by a wall of angled windows—where customers order food—covered by a dramatic, cantilevered roof extending over the ordering area. The windows are set in aluminum frames, span the entire main façade, and wrap around the corners. Below the windows is a smooth, concrete base, angled away from the building and projecting slightly, creating a counter for the food-ordering area. The top of the counter is stainless steel. The interior of this section of the building is accessed by an aluminum and glass door at the west side.

The cantilevered roof is classic Googie style, with zig-zagging fascia and neon lights. Seven cubes set on poles rise from the roof (likely part of the original Kwik Way signage). The underside of the roof is lined with lights that illuminate the food-ordering area. The floor area underneath the roof canopy appears to be painted concrete or granite. The outdoor food-ordering area is delineated by bollards, which protect customers from the vehicular parking spaces encircling the building.

The rear section of the building is a high one-story, box-like in massing, and has a flat roof. The south wall is constructed of concrete masonry units. The east and west walls are faced with randomly laid fieldstone, which has been painted white. A boxy addition, shorter in height than the rest of the building, projects from the southeast corner of the south wall; its walls are concrete masonry units, and the roof is flat. This rear section of the building is accessed via doors at the south and east facades, as well as a door on the west wall of the addition. The interior was not accessed during the site visit.

West and south façades, 2150 Telegraph Avenue. Source: Architecture + History, LLC, 2016.

Site History
In the late 1880s, the corner of Telegraph Avenue and 22nd Street (subject site) contained four single-family residences, three outbuildings, and a large vacant lot to the south.5 Those buildings still existed on the site in 1902, as well as (to the immediate south) a large, two-story commercial building with lodging upstairs and a two-story residential apartment building (flats), which existed on the site through the mid-1930s. Businesses located in the commercial building over the years included a furniture factory; Japanese laundry; upholstering, plumbing, painting, and carpentry companies; an auctioneer; and a business providing car batteries. By 1912, the single-family residences at the corner of Telegraph and 22nd, had been either destroyed during the 1906 earthquake or demolished. The commercial building was demolished sometime between 1939 and 1946.6 The residential apartment building was demolished in 1946.7 The subject site was used for parking from 1946 until 1953.

In October 1953, Herman Lehman and Joseph Mahoney applied for a permit to build a restaurant on the corner of Telegraph Avenue and 22nd Street.8 The builder was James A. Hutzler of Oakland (theno architect is unknownwas listed on the building permit). Restaurant fixtures and equipment were supplied by East Bay Restaurant Supply Co. of Oakland, Carbonic Machines of San Francisco, and Red Top Electric of Emeryville. The estimated cost was $20,000. The final permit was issued on November 23, 1953. Known as Kwik Way #2 (or Kwik Way Shops), the building was completed in December 1953.

Kwik Way #2 operated at 2150 Telegraph Avenue from 1953 through circa 1996.9 Beginning circa 2000, the Giant Burgers chain took over the restaurant. Giant Burgers remained at 2150 Telegraph Avenue through December 2014.10 Space Burgers took over the space in February 2015.

The building at 2150 Telegraph Avenue appears to have not been significantly altered since its construction in 1953. Permitted alterations include the following:

- In 1959, copy on the original signage was changed to read, “Chicken, [illegible], Malts.”

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5 The site history was developed using Sanborn Fire Insurance Company maps from 1889, 1902, 1912, 1935, 1950, and 1970.
6 Essel Environmental Consulting, Phase I Environmental Site Assessment, 495 22nd Street, Oakland, CA, June 30, 2015, page iv.
7 Essel Environmental Consulting, Phase I Environmental Site Assessment, 495 22nd Street, Oakland, CA, June 30, 2015, page iv.
8 Building permit #B49596, October 5, 1953, Oakland Cultural Heritage Survey files.
10 Essel Environmental Consulting, Phase I Environmental Site Assessment, 495 22nd Street, Oakland, CA, June 30, 2015.
In 1963, toilet and storage rooms were added (permit #C11665).
In 1985, a drive-up window was proposed (permit #037676).
In 1998, the restaurant was remodeled and the sign face was changed.\textsuperscript{12}

**Owner / Occupant History**

**Kwik Way**

Kwik Way was a fast-food, drive-in restaurant chain introduced by Lehman and Mahoney in Oakland circa 1953. The first Kwik Way opened at 6215 E. 14\textsuperscript{th} Street, International Boulevard (unknown condition) circa 1953.\textsuperscript{13} This former Kwik Way has been significantly altered, including additions to the building and the site, which was also a corner location. Alteration to the front façade include new tile at the building base and entry which reflect its current use as a Mexican restaurant, Las Palmas. See the current photograph and aerial view of the site provided below.

\textbf{Current condition of the former Kwik Way at 6215 International Boulevard in Oakland}

\textsuperscript{12} Essel Environmental Consulting, *Phase I Environmental Site Assessment, 495 22\textsuperscript{nd} Street, Oakland, CA*, June 30, 2015: 27.

\textsuperscript{13} Need source. From Wikipedia. *Oakland Tribune, Joe Maloney “of the new Kwik Way hamburger shop out 14th,”* June 18, 1953. 18, Col S.
An aerial view of the former Kwik Way at 6215 International Boulevard. The original building has been engulfed in additions to the building and the site.

The Kwik Way at 2150 Telegraph Avenue was followed by a third Kwik Way at 500 Lake Park Avenue in 1956 (extant but proposed for demolition).\(^4\),\(^5\) The third Kwik Way was located just a half block from the Grand Lake Theatre. This building was also sited on a somewhat unique lot just at the bend in Lake Park Avenue and with access from Cheney Avenue to the north. This building has most recently housed the Merritt Bakery and appears to retain a good deal of integrity including distinctive canopy wings that extend to the east and west on either side of the main take out window, which faces south along Lake Park Avenue. A current development proposal has been approved for the site and the building is slated for demolition. It was not considered an individual historic resource during environmental review for that project.

\(^4\) Building permit #55342, May 3, 1955, Oakland Cultural Heritage Survey files.
\(^5\) Building permit #55342, May 3, 1955, Oakland Cultural Heritage Survey files.
The Kwik Way near the Grand Lake Theatre

The Kwik Way chain called itself the “first 19-cent self-service drive-in” in Northern California, proclaiming, “Copied by many—equaled by none.” It proudly advertised its use of locally sourced ingredients, including beef from Piedmont Market, chicken from Parenti Poultry Co., and “custom-made, oven-fresh buns” made by Athens Baking Co. Standard Kwik Way menu items were burgers, various chicken dishes, BBQ sandwiches, fries made from “Idaho spuds,” and “thick and creamy” malts. In the late 1950s, the Kwik Way chain sponsored a boys’ little league team in the Babe Ruth Winter League.

Kwik Way #2 at 2150 Telegraph Avenue held its grand opening on December 16, 1953. An advertisement in the Oakland Tribune announcing the opening reads:

The welcome mat is out. Kwik Way, New Self-Service Drive-In, 2150 Telegraph – 1 block North of Capwell’s. 5-second service! A quick, good lunch for 30 cents. Walk in, drive in, eat here, take ‘em out. Open 10:00 A.M. to 2:00 A.M.

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The opening day specials were five hamburgers for 50 cents and two half chickens for $1.00.

Kwik Way celebrated its one-year anniversary on May 1, 1954, announcing the party in the *Oakland Tribune*:

Welcome! Welcome! Welcome! Yup, we made it! Kwik-Way 1st Anniversary. Saturday, May 1st. Northern California’s first 19-cent self-service drive-in. Circus clowns, prizes, novelties. E. 14th at 63rd Ave. near Seminary (also at Telegraph & 22nd). 19-cent hamburgers, 49-cent fish ‘n’ fries, 69-cent fried chicken.22

Kwik Way #2 operated at 2150 Telegraph Avenue through at least 1969 under the management of Lehman and Mahoney.23 The restaurant at 2150 Telegraph Avenue retained the Kwik Way name through circa 1996.24 Kwik Way #2 was included in a review of “low-brow” restaurants in Oakland in 1984, written by Gerald Nauchman in the *Oakland Tribune*: “As an Oaklander bred and born, my roots go deep at Kwik Way Drive-In—a primitive McDonald’s, a ’50s pioneer in the see-through patty, the non-milk shake, the ice-floe Coke and twice-fried fries.”25

**Other Occupants**

Beginning circa 2000, the Giant Burgers’ chain took over the restaurant. Giant Burger remained at 2150 Telegraph Avenue through December 2014.26 Space Burger took over operation of the restaurant in February 2015.

**Architect / Builder**

**Architect**

Building permits for 2150 Telegraph Avenue do not identify an architect for 2150 Telegraph Avenue. However, James A. Hutzler was identified as the builder.

**Builder**

James A. Hutzler was born in Reno, Nevada on June 19, 1918, to Ernest and Loretta (Bullock) Hutzler.27 After serving in the Navy during World War II, on the USS Massachusetts, Hutzler moved to the San Francisco Bay Area, where he owned and operated the Hutzler Construction Company. After 30 years in the Bay Area, Hutzler and

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23 R.L. Polk and Co., *Polk’s Oakland City Directory*, online at SFPL.com.
24 Essel Environmental Consulting, *Phase I Environmental Site Assessment, 495 22nd Street, Oakland, CA*, June 30, 2015.
his wife, Ora, moved to the Reno-Sparks area. While there, he owned the J&O Ranch and the Silver Appaloosa Ranch in the Smith Valley and Wellington areas. Hutzler was active in Masonics and was a member of the USS Massachusetts Association and the Disabled American Veterans. He died on January 16, 1999 in Reno.

**Building Type and Style - Drive-in Restaurant and Googie Style**

Architectural historians generally agree that one of the nation’s first drive-in restaurants was Sunbelt’s Pig Stand, built on a highway between Dallas and Fort Worth, Texas in 1921. At the Pig Stand, customers “would pull in to the parking lot and be immediately greeted by carhops, combination waiter-busboys, who served burgers and fries on trays that clipped on to the car’s window.” The Pig Stand was quickly followed by other drive-ins throughout the country. One of the earliest drive-ins in California was Montgomery’s Country Inn (later called the Tam o’ Shanter Inn) on Los Feliz Boulevard in Los Angeles. By the early 1930s, drive-ins could be found throughout California. Perhaps the strongest indicator of the drive-in’s popularity, the February 1940 issue of *Life* magazine featured a carhop on its cover. The March 1940 issue of *Westways* included an article on drive-ins, referring to them as America’s “belles of the boulevards.”

The drive-in restaurant, along with other automobile-oriented building types, such as the motel, was a byproduct of the increasing popularity of automobile travel and, later, suburbinazation. “Drive-in architecture grew up to feed, service, and entertain the newly mobile public as they went about their lives on the far-flung streets and boulevards,” writes historian Alan Hess. They were fast and efficient for travelers, as they allowed patrons to be served in their cars. They were popular with restaurant owners, as well, because they required fewer employees, which meant higher profit margins. As competition between drive-ins picked up, restaurants fought to stay ahead by providing faster service, resulting in gimmicks such as rollerskating carhops.

The first drive-ins presented a wild variety of designs as they tried to lure passersby. “In the beginning there were no design rules, and ... the streets sprouted strange architectural anomalies. Spanish revival missions sat catty-corner from colonial mansions, and it was not uncommon to pull up to a 30-foot stucco pig and be served a hot dog from

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its 6-foot snout.” 33 By the 1930s, drive-ins began to adopt common design features, such as octagonal or circular forms, large rooftop signs, and siting in the middle of a corner lots, which “allowed more cars to park close to the building, making service easier and attracting more customers.” 34 Drive-ins of the 1930s, according to Alan Hess, “were arguably the most radically Modern buildings ever constructed in the United States. No other buildings were shaped so effectively by technology—by the automobile. No Modern building unified function, advertising, and urban presence more effectively.” 35

The practice of combining building design with advertising took off in the 1940s and 1950s. Architects of drive-in restaurants “recognized that, for a commercial building, advertising is a legitimate function to be expressed in architectural form. To make a relatively small building visible to customers from far down the street, the entire building was conceived as a sign to attract customers.” 36 The result was revolutionary, a panoply of hyper-modern, wimsical, eye-catching buildings that “fit the needs of the new California ‘car culture’ and the dreams of the even newer space age.” 37 Popular design elements were bold angles, colorful neon signs, plate-glass windows, stainless steel, sweeping cantilevered roofs, and pop-culture imagery. The style became known as Googie, a term coined in 1949 by House and Home magazine editor Douglas Haskell to describe the design of Los Angeles coffee shop Googies, designed by California Modernist John Lautner. 38 Writing about Googie-style buildings, Alan Hess says that they were evocative of California’s “prosperity and its distinctive lifestyle...made widely available to the average citizen. [They] brought a sense of California as a place where the future had already arrived, and was available to everyone as they went about their daily lives.” 39 One of the “finest examples of Googie in Oakland,” according to Hess, is Biff’s/JJ’s at 27 th Street and Broadway, designed by Googie specialists Armét & Davis (Louis Armét and Eldon Davis), and completed in 1963. JJ’s round design—symbolic of the 1950 and 60s fascination with the automobile and space travel—is a version of Googie called Coffee Shop Modern, established by Armet and Davis. 40

Drive-in restaurants began to wane in popularity by the end of the 1950s, replaced in part by the drive-thru fast food restaurant model. Introduced by the In-N-Out chain in Southern California in 1948, drive-thrus proved even more fast and efficient than drive-ins, allowing

35 Ibid.
motorists to order food from a drive-in window, take their food to go, eating it on the go. Drive-ins all but disappeared in the 1960s when fast-food franchises and coffee shops took over as the most successful drive-in restaurant models.

Known Drive-In Restaurants in Oakland
The Oakland Cultural Heritage Survey maintains a file on historic drive-ins, coffee houses, and diners in Oakland. According to the list of sites in the file, Kasper’s at 4521 Telegraph Avenue (extant), was one of the first drive-in restaurants in Oakland. It opened in 1943. The following is a sampling of other drive-in, coffee-shop, or diner restaurants (excluding Kwik Ways mentioned in previous sections) that followed and are currently extant:

- Klik’s/King Drive-In, 801 East 12th Street (extant), opened circa 1945-46 (possibly owned by Lillian Klik)
- Dave’s Coffee Shop, 4297-99 Broadway (extant), opened circa 1950
- Casper’s, 1240 1st Avenue (extant), opened circa 1950
- Nikko’s, 340 23rd Avenue (extant), opened 1952
- Sea Wolf/Scott’s, 2 Broadway at Jack London Square (extant), opened circa 1952-54
- Mel’s Diner, 1701 San Pablo Avenue (extant), opened circa 1953-54
- Coliseum Drive-In, 5401 Coliseum Way, opened 1964
- Hambrick’s Giant Burger, 3625 E. 14th Street (extant), opened circa 1965
- Loard’s, 2825 MacAurthur Boulevard (extant), opening date unknown
- Hambrick’s Giant Burgers, 5325 San Pablo Avenue, opening date unknown
- Giant Burger, 4215 MacAurthur Boulevard, opening date unknown

California Register of Historical Resources Evaluation
California Register Criterion 1: Event or Patterns of Events
Based on historical research, the building at 2150 Telegraph Avenue in Oakland, California does not qualify individually under California Register Criterion 1: Event/Patterns of Events, for either its association with the development of downtown Oakland or with the growing interest in and expansion of Fast Food Restaurants during the post-World War II era. While these are certainly historical contexts or events that could be linked to this building, the significance of this building is much more closely aligned with the development of the Googie style of architecture within the restaurant industry in California and Oakland, of which this is an outstanding example. The building does not possess an association with an important event that rises to a level of significance that would justify individual eligibility for the California Register.

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43 OCHS file on drive-ins, coffee houses, and diners in Oakland.
California Register Criterion 2: Important Person(s)
Based on historical research the building at 2150 Telegraph Avenue is not associated with any individuals who have had an important role in local, California or national history. There does not appear to be a link between the owners or builders of this building and any significant historical events relating to Oakland history. The building does not appear to qualify under California Register Criterion 2: Important Person(s).

California Register Criterion 3: Design/Construction/Architecture
The Googie-style restaurant at 2150 Telegraph Avenue, historically known as the Kwik Way #2, appears to be individually eligible for the California Register of Historical Resources under Criterion 3: architecture. It is an excellent example of a building type, a diner / drive-in restaurant, and a style of architecture, Googie architecture. The building is associated with the expanded interest in quick service food that resulted in the development of a specific building type. It was one of several, small-scale restaurants developed under the Kwik Way brand in the east bay. The building possesses significance within the context of mid-twentieth century architecture and design as an example of the Googie style. The building conveys this significance through its intact building elements with a high level of integrity of location, design, materials, workmanship, feeling, association. The integrity of setting has changed somewhat over time as surrounding, older buildings have been replaced with more recent construction. However, the building retains angled corner orientation and there are still a large number of historic structures in the immediate vicinity which add to the overall setting.

Potential Thematic Grouping
Googie style restaurants, diners and burger joints are scattered around Oakland’s commercial areas. There is no significant concentration of these building types in any one location in Oakland that would justify a traditional geographic historic district. A discontinuous thematic historic district would likely include other Googie restaurants, diner or burger joints throughout the City, not just the Kwik Way buildings. A discontinuous or thematic district of all Googie style restaurants or diners has not been fully evaluated as part of the environmental review for this project. The only other thematic grouping of historic buildings designated by the City of Oakland are the four Oakland Carnegie Libraries which were designated together in one nomination in November 1980.
2115 and 2127 Broadway and Banking Related Buildings in Uptown Oakland

There are two branch bank buildings dating to the mid-1970s on the project site. First, the Security Pacific National Bank, designed by William L. Pereira Associates in 1974 at 2115 Broadway. Second, the Sanwa Bank designed by Shigenori Iyama in 1975 at 2127 Broadway. Some contextual information on the development of the Modern branch bank, as well as bank expansion in this area of Oakland is provided first, and then each building is discussed and evaluated in detail. Lastly, a discussion of the cluster of bank buildings is provided.

After World War II, American commercial architecture departed from past expressions in scale, style, and building types. This is true of branch bank buildings which no longer employed Classical motifs or a temple front. Banking design shifted to box forms with minimal decoration in a Modern expression. To convey a Modern aesthetic and new financial services, banks often turned to local or regional architects who had embraced Modernism to build new, more suburban in character structures. This is reflected in California in a series of bank headquarters and branches by Modernism’s significant California architects and firms including: John Carl Warnecke, William Pereira, William Wurster (Wurster Bernardini Emmons), Paul Revere Williams, Edward Durell Stone, Anchen & Allen, Skidmore, Owings & Merrill, Welton Becket Associates, and others. The Modern branch bank included large expanses of glass, a sleek interior with shiny materials, drive-up and walk-up banking, parking (even in more urban settings), and large areas, usually of the grand-scale lobby, set aside for customers to meet individually with financial advisors.44

In Oakland, this transition in branch bank design also coincided with the development of BART. Envisioned and designed in the 1950s, construction on the BART system began in 1964, with the official first days of service occurring in September 1972 with the east bay service complete. The Transbay Tube went into full service in 1974. Two downtown BART stations were developed: one at 12th Street which became known as “City Center,” and one servicing 19th and Broadway.45 In the vicinity of the 19th Street BART station along both Broadway and Webster, at least thirteen bank-related buildings were constructed between 1960 and 1975. The last two structures constructed were the two branch banks on the project site at 2115 and 2127 Broadway.46

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45 Bay Area Rapid Transit (BART) history on the BART website at www.bart.gov/about/history.
46 OCHS files and building permit research by Betty Marvin; various Oakland Tribune articles and photographs; Oakland Public Library. Oakland History Room Clippings File on Oakland Banks.

Banks developed along Broadway and Webster Streets in Oakland

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>Permit Year</th>
<th>Year Open</th>
<th>Permit Info, Etc.</th>
<th>Architect</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Valley Bank</td>
<td>301 20th St</td>
<td>1960</td>
<td>1961</td>
<td>Planning Commission resolution plans submitted by Becket</td>
<td>Welton Becket &amp; Associates</td>
<td>Demolished&lt;sup&gt;a&lt;/sup&gt;</td>
</tr>
<tr>
<td>Sumitomo Bank</td>
<td>400 20th St / 2001 Franklin</td>
<td>1964</td>
<td>1966</td>
<td>C16715</td>
<td>Shigenori Iyama</td>
<td>Somewhat altered</td>
</tr>
<tr>
<td>Wells Fargo Bank</td>
<td>415 20th St</td>
<td>1964</td>
<td>1965</td>
<td>C19803</td>
<td>John Carl Warnecke</td>
<td>Significantly Altered&lt;sup&gt;b&lt;/sup&gt;</td>
</tr>
<tr>
<td>First Security / National</td>
<td>2044 Franklin St</td>
<td>1965</td>
<td>1966</td>
<td>C22497, a cross-reference page refers to Lyman Jee, architect</td>
<td>Lyman Jee</td>
<td>Extant</td>
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<tr>
<td>Bank of California</td>
<td>1970 Franklin St</td>
<td>c. 1967</td>
<td>1968</td>
<td>permit not found</td>
<td></td>
<td>Extant</td>
</tr>
<tr>
<td>Bank of America</td>
<td>21&lt;sup&gt;st&lt;/sup&gt; &amp; Broadway</td>
<td>?</td>
<td>1967</td>
<td>?</td>
<td></td>
<td>Demolished&lt;sup&gt;a&lt;/sup&gt;</td>
</tr>
<tr>
<td>Guaranty Savings</td>
<td>2000-20 Franklin St</td>
<td>c. 1967</td>
<td>1968</td>
<td>Permit illegible, correspondence refers to &quot;Robert Goetz, architect&quot;</td>
<td></td>
<td>Extant</td>
</tr>
<tr>
<td>First Savings</td>
<td>350-60 20th St</td>
<td>c. 1968</td>
<td>1968</td>
<td>address assigned 1960, permit not found</td>
<td></td>
<td>Extant</td>
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<tr>
<td>United California Bank</td>
<td>2040 Franklin St</td>
<td>c. 1968</td>
<td>1968</td>
<td>permit not found</td>
<td></td>
<td>Interior alterations</td>
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<tr>
<td>Bank of Tokyo</td>
<td>1740-50 Broadway</td>
<td>1972</td>
<td>1975</td>
<td>C64797</td>
<td>Van Bourg &amp; Nakamura</td>
<td>Extant</td>
</tr>
<tr>
<td>National Bank</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sanwa Bank</td>
<td>2127 Broadway</td>
<td>1975</td>
<td>1975</td>
<td>C86187</td>
<td>Shigenori Iyama</td>
<td>Extant</td>
</tr>
</tbody>
</table>

<sup>a</sup> Buildings significantly altered or demolished.
Oakland Tribune, 1968.

The above aerial photograph marking the numerous bank-related buildings in downtown Oakland taken from the Kaiser Center in 1968 shows that cluster of businesses that emerged in the 1960s around the 19th Street BART station. On the following page a map depicts the locations of all thirteen of the banking buildings and if they remain standing or not.
Map showing locations of existing bank-related buildings in Uptown Oakland (Source: Preservation Architecture, 2017).
2101-2115 Broadway – Former Security Pacific National Bank

Subject Parcel & Past Evaluation
This building sits at the corner of Broadway and 21st Street in downtown Oakland on APN 008-648-18. The current OCHS Rating is *3 (less than 45 years old or modernized at the time of the survey). The building is not located within an identified historic district or an Area of Primary Importance (API). No extensive survey of Modern Buildings has been undertaken in downtown Oakland, nor has an historic context statement for Modern Architecture in Oakland been completed. Project drawings on file with the City of Oakland related to building permit # C80714 were completed by William L. Pereira Associates. These drawings were photographed in the office of the OCHS, but they have not yet been formally copied or scanned pending any permission that may be required.

William Pereira is a known master architect with an extensive body of work. There is a monograph on Pereira, edited by James Steele, that includes what Steele identifies as a somewhat incomplete list of projects, based on a log book of projects maintained by Pereira’s office. At this time, based on research completed, it does not appear that Pereira completed any other buildings in Oakland. William L. Pereira Associates designed a number of buildings the Bay Area, including the Transamerica Building, the Crocker Bank Building, and a tower addition to the St. Francis Hotel in San Francisco; a California State Building in Sacramento; and a research institute near Stanford University.
Additionally, beginning in 1951 with an early partner Charles Luckman, then through the 1970s as William L. Pereira Associates, Pereira designed over 25 identified banking related buildings, including branch banks and banking headquarters. Many of these examples were in Southern California, where a large collection of Pereira’s work remains extant, but he also designed banking related buildings in Phoenix, Denver, Salt Lake City and New York. Two prominent examples of his branch bank buildings are the Farmers and Stockmen’s Bank (1951) in Phoenix, with Luckman and the Gibraltar Savings Bank in southern California. Both of these buildings are pictured in Steele’s monograph.

Pereira also completed a tower for Security Pacific National Bank in downtown Los Angeles, at 800 W. 6th Street, which has been renamed the Pacific Financial Center. From a review of the project list in Steele’s monograph it is clear that Pereira often built multiple projects for clients in various locations. For instance, both branch banks and a headquarters for the Crocker Citizen’s National Bank and multiple buildings for Prudential Insurance.

Current Architectural Description
The Security Pacific National Bank branch at 2101-15 Broadway was completed in 1975. A corner building, the structure is two stories in height, and rectangular in plan with a flat roof. The Broadway and 21st Street elevations are extensively glazed with large expanses of dark-colored glass. The second story is cantilevered over the first floor and appears to float above the lower story. The exterior walls are a combination of marble, aluminum, and glass. There is a cube-shaped inset, two-story component at the eastern end of the building this is sheathed in white marble forming a stark contrast to the dark glazing. The first-floor lobby is a double-height space. A landscaped area along the 21st Street side of the building leads to a projecting elevator tower also clad in white marble. At the Broadway elevation the sidewalk and a handicap access ramp continue to the building face. Additionally, at the Broadway side there is a door to the banking lobby and a door to the upper story offices. An ATM machine is centered on the lower portion of the Broadway elevation. There is a landscaped passage way between this structure and the adjacent 2121-27 Broadway.

History of Building
The Oakland Tribune announced in February 1973 that Security Pacific National Bank had hired preeminent Modernist architect William Pereira to design the building at the corner of Broadway and 21st Street. This is confirmed by the building plans located in the City of Oakland archives clearly from the office of William L. Pereira Associates. The building permit lists the architect as ORS Corporation from Los Angeles and the builder as E.W. Hahn Construction Co. of Hayward. ORS Corporation, appears to have specialized in

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48 City of Oakland Building Permit Number C807142, May 13, 1974,
banking fixtures, such as automated teller machines. Security Pacific National Bank was formed in Southern California and by the middle of the twentieth century it was a well-respected large west coast banking institution. In 1992, Security Pacific merged with Bank of America.

Architect / Designer
Born in Chicago in 1909, William Leonard Pereira began working as a draftsman at a young age and soon became an architect's assistant, also supporting himself as a painter. He graduated from the University of Illinois School of Architecture in 1931. After graduation, Pereira was employed by the well-known Chicago firm of Holabird and Root, where he contributed to the master plan of the 1933 Chicago World’s Fair.

He began a partnership with his brother Hal, Pereira and Pereira, together focusing on movie theater design throughout the U.S. At the height of the Depression, in 1938, William Pereira moved to Los Angeles, and became a production designer for Paramount and RKO.

After World War II, Pereira taught at the University of Southern California School of Architecture. In 1950, he formed a partnership with Charles Luckman, the former president of Lever Brothers and fellow Illinois native. This partnership was somewhat short-lived (1951-58) and Pereira then formed William L. Pereira Associates in 1959. The firm created some of Los Angeles’ most significant architectural landmarks, including the master plan and an iconic building, the Theme Building, at the Los Angeles International Airport. At one time, the firm employed four hundred people. Known for its projects at airports throughout the world, in campus and university settings and for major American corporations, including financial, insurance and large corporations like IBM.

The Los Angeles Conservancy notes of Pereira’s practice, “the firm had its hand in designing everything from amusement parks to research facilities. Pereira and Associates not only gained national recognition for its buildings, but also for the many master plans produced by the firm, making Pereira a leading figure of master planning, so much so that it landed him on the cover of Time magazine in 1963.”

Pereira died in 1985 at age 76; his most recognized buildings include: the Los Angeles Metropolitan Water District complex (1963); the Los Angeles County Museum of Art (Mid-
Wilshire, 1965); the Geisel Library at the University of California, San Diego (1970); San Francisco’s Transamerica Pyramid (1972); and multiple works and master planning at the Los Angeles International Airport, the University of Southern California (USC) and the University of California, Irvine.\(^\text{12}\)

Throughout his career Pereira was engaged in projects on college and university campuses, at airports and for the aviation industry, for corporate campuses and towers, civic centers, hotels, libraries, department stores, theaters and entertainment facilities, and many west coast banks. His bank buildings are found around Los Angeles, in Salt Lake City, Utah, and even one in Butte, Montana.

**Past Alterations / Changes**

- **July 2005** – soft demo on entire 1\(^{st}\) and 2\(^{nd}\) floor for future tenant improvement
- **January 2005** – electrical upgrades for structural and plumbing fixtures toilets, sinks and floor drain.
- **May 2005** – electrical, plumbing, mechanical permits for interior improvements
- **March 2005** – structural upgrade including complete interior remodel including mezzanine improvements
- **April 2006** – installation of wall mounted signs
- **September 2006** – installation of channel letters
- **October 2006** – electrical and circuit upgrades.
- **January 2012** – electrical and lighting upgrades
- **March 2012** – installation of three fire / smoke dampers and alterations to interior floor plan, tenant improvements lobby and ground floor
- **October 2012** – approval of use for general retail men’s clothing and sportswear.

Note permit files include several permits for the building(s) on this site prior to the construction of Security Pacific Bank – these are not listed here as these structures are no longer present on the site.

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12 James Steele. *Pereira*; and both the NYT and LAT obituaries on Pereira.
California Register of Historical Resources Evaluation

California Register Criterion 1: Event or Patterns of Events
Based on historical research, the building at 2101-2115 Broadway in downtown Oakland, California does not qualify individually under California Register Criterion 1: Event/Patterns of Events, for its association with the development of Uptown Oakland’s financial and banking industry or with the BART development. The building does not possess an association with an important event that rises to a level of significance that would justify individual eligibility for the California Register. The building is one of a number of banking related structures that were built in Uptown between the mid-1960s and the mid-1970s. See discussion below related to this cluster of banking buildings.

California Register Criterion 2: Important Person(s)
Based on historical research, the building at 2101-2115 Broadway is not associated with any persons or individuals who have had an important role in local, California or national history. There does not appear to be a link between the owners or designers of this building and any significant historical events relating to Oakland history. The building does not appear to qualify individually under California Register Criterion 2: Important Person(s).

California Register Criterion 3: Design/Construction/Architecture
The former Security Pacific National Bank branch at 2101 Broadway does not appear to individually meet Criterion 3 of the California Register of Historical Resources as an exceptional example of corporate Mid-Century Modernism in Oakland. The work of William Pereira has been highly documented and given the length of his career, enough time has passed to understand his significant contributions to American and Modern Architecture. Clearly designed in a Modern idiom, with Modern materials, the building was intended to convey the importance of the Modern bank within an urban setting. However, after review of Pereira’s banking work over the course of his career, and the other banking-related structures in this area of Oakland, this building does not stand out individually as an exceptional or outstanding design within Pereira’s body of work or within the building type as exampled in Oakland. Additionally, the building falls outside of the period of significance for Pereira’s well-known work as it was built in 1975.
2121-2127 Broadway – Former Sanwa Bank

**Subject Parcel and Past Evaluations**
This building faces Broadway between 21st and 22nd in downtown Oakland on APN # 008-648-17. The OCHS Rating is *3 (less than 45 years old or modernized). The building is not located within a historic district or an API. No extensive survey of Modern Buildings has been undertaken in downtown Oakland, nor has an historic context statement for Modern Architecture in Oakland been completed.

**Current Architectural Description**
The building at 2121-27 Broadway is two stories in height, rectangular in plan and has a flat roof. The exterior walls are concrete. The exterior façade finish consists of steel panels with an enamel coating that have subsequently been painted. The mid-block structure has punched openings at the Broadway facade that form a covered outdoor area and a glazed lobby. The overall character of the structure is somewhat Brutalist in its expression.

**History of Building**
The Sanwa Bank building at 2121-27 Broadway was completed circa 1975, and was designed by architect Shigenori Iyama of S. Iyama & Associates.53 The Sanwa Bank was a

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53 City of Oakland Building Permit Number C86187, September 12, 1975, owner Sanwa Bank.
major Japanese bank with branches in California. It operated from 1933 to 2002 when it merged with another Japanese banking institution.

**Past Alterations / Changes**

No earlier alteration permits (except signage) for this building were found during a review of microfiche records housed with the City of Oakland.

- March 1988 – install monument sign
- November 1999 – HVAC improvements and new AC
- December 2001 – Reface two existing signs and replace 1 sign
- March 2003 – Sign removal and replacement for bank
- July 2005 – Tenant improvement for offices
- March 2010 – Install security fence at interior lot
- January 2013 – Re-roof

**Architect / Designer**

According to a 1962 *American Architects Directory*, Shigenori Iyama was born in Fukuoka, Japan on February 16, 1927 and was educated at the University of California, Berkeley graduating in 1949. United States Immigration Records indicate the Iyama family arrived in California on the *M. S. Asama Maru* from Kobe, Japan in August 1931 when he was four years old.\(^{54}\) During World War II, Iyama was incarcerated at the Central Utah Relocation Center at Topaz. He married Mary Imagawa in 1951. Iyama applied for and was granted U.S. citizenship in 1954.\(^{55}\) He worked for architects Jack Buchter and A. Hunter before starting his own firm.\(^{56}\) He died at the age of 65 on May 25, 1992.\(^{57}\)

Neither the Pacific Architecture Database or the International Architecture Database contain very little information relating to Iyama. The University of California, College of Environmental Design does not list the archives of Shigenori Iyama among its collections. Iyama had an architecture office in Berkeley in the mid-1950s, and by the late 1950s he was working out of Oakland with Al Hunter as Hunter and Iyama.\(^{58}\) A search of local newspaper indexes and survey books identified the following projects:

- St. Peter's Catholic Church (1961-62), San Rafael, Al Hunter & Shig Iyama;
- Mill Valley community and youth center (1964), Shig Iyama and Robert M. Tanaka. *(San Rafael Daily Independent Journal*, May 19, 1964);

\(^{54}\) Manifest from the *M. S. Asama Maru* from Kobe, Japan in August 1931. Ancestry.com


\(^{58}\) *San Rafael Daily Independent Journal*, March 8, 1957
• Vallombrosa retreat center (1964), Menlo Park, CA, *(San Mateo Times, California, 1964)*;
• St. Sylvester’s Church (1966), San Rafael, CA *(San Rafael Daily Independent Journal, May 7, 1966)*;
• Village Plaza (1967), Fairfax, CA *(San Rafael Daily Independent Journal, March 24, 1967)*.

Iyama also designed, with his associate Robert Tanaka, the Sumitomo Bank Building at 2001 Franklin Street at 20th Street in downtown Oakland. The Franklin Street bank, occupies a prominent corner and is a more dramatic and architecturally sculpted structure than the building at 2121-27 Broadway.

California Register of Historical Resources Evaluation

**California Register Criterion 1: Event or Patterns of Events**

Based on historical research, the building at 2121-2127 Broadway in downtown Oakland, California does not qualify *individually* under California Register Criterion 1: Event/Patterns of Events, for either its association with the development of downtown Oakland or for its association with a financial or banking institution. While these are certainly historical contexts or events that could be linked to this building, the building does not possess an association with an important event that would elevate it to a level of significance to justify *individual* eligibility for the California Register.

**California Register Criterion 2: Important Person(s)**

Based on historical research, the building at 2121-2127 Broadway is not associated with any persons or individuals who have had an important role in local, California or national history. It does not appear to have been built for an important Oakland business entity and the building does not possess significant links to important persons or events. There does not appear to be a link between the owners or designers of this building and any significant historical events relating to Oakland history. The building does not appear to qualify *individually* under California Register Criterion 2: Important Person(s).
California Register Criterion 3: Design/Construction/Architecture

While the building at 2121-27 Broadway is associated with Iyama, limited information about his body of work was discovered making it difficult to assess his significance within the context of Corporate Modern Architecture in Oakland. Certainly, his building at 2001 Franklin is a more interesting, innovative, and iconic structure. While further research may be required to determine if Shigenori Iyama could be considered a master architect, it does appear that the building that more significantly represents his distinctive design capabilities in the context of Modern Architecture in Oakland is the bank building at 2001 Franklin Street. The building at 2121-27 Broadway is less than 50 years in age, and does not appear to be a significant example of Modernism in Oakland. While clearly displaying a modern idiom, the building does not possess the distinctive characteristics of a type, period, region, or method of construction, nor does it possess high artistic values that would make it individually significant under the California Register criteria.

Grouping of Bank Buildings in Uptown Oakland

As noted above, from 1961 to 1975 thirteen banking related structures were constructed in Uptown Oakland, some designed by important mid-century architects or architectural firms. A total of four buildings proposed for demolition include the Security Pacific, Sanwa Bank, Bank of Tokyo, and First/Security National banks. Remaining buildings include the Sumitomo, Bank of California, First Savings, Guaranty Savings, United California, and Security Savings banks. As shown in the previous map, there is a remaining cluster of bank buildings at Franklin between 21st and 22nd Streets that could be formed into an Area of Secondary Importance (ASI).
2135-2147 Broadway (Sherman Clay Building)

A view of the Sherman Clay Building along Broadway.

Subject Parcel & Past Evaluation
This building faces Broadway between 21st and 22nd Streets. It sits on APN # 008-648-1. The building is not located within the boundaries an API or ASI or in a designed historic district.

The previous OCHS Survey Rating was Dc3. D means properties of minor importance (existing rating at time of initial evaluation); c means condition “if restored” (contingency rating); and 3 means not in a historic district.

Current Architectural Description
The building at 2131-47 Broadway is a two-story structure, trapezoidal in plan, and sits on a corner lot at the southwest corner of Broadway and 22nd Street (22nd Street was formerly 21st Street – See 1950 Sanborn Map). As originally designed by architect William Weeks, this commercial building was a good example of a small-scale commercial structure employing the Chicago style. It had somewhat modified three-part, upper story windows popularized by American Chicago School architects from the 1880s into the 1920s.
However, in January 1960, the building received a façade screen that altered its overall character. This screen was removed circa 1994. However, a review of permit history with the City of Oakland did not confirm the date of the building’s remodel. While the removal of the façade screen has improved the appearance and integrity of the structure to a certain degree, it has still been highly altered at the lower, storefront level at both the Broadway and 22nd Street facades. The primary storefront façades along both Broadway and 22nd Street have replacement storefront systems and the clerestory or transom windows above the storefronts are covered over and it is unclear if the windows are extant. At the 22nd Street side the clerestory windows have been infilled. The upper story appears to be more intact with possible original decorative fretwork detailing below the window sills and decorative modillions above. The brick was not likely originally painted.

A view of the Sherman Clay building with its upper story screen from about 1980.

Note that the lower level of the building was altered by this time as well. The current configuration of the lower level, including the mosaic at the building entry, dates to about 1994 when the screen was removed and the building was remodeled.

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59 City of Oakland Building Permit #885699 – January 14, 1960; Orinda Properties Inc., owner; $52,000; remodel building fronts with aluminum curtain walls. Contractor, Christianson and Lyons.

60 Oakland Cultural Heritage Survey file notes indicate screen removed 1994.
History of Building

The building at 2135-47 Broadway was designed by architect William H. Weeks and built by Carnahan & Mulford in 1917 for H. S. Crane. This information is listed on City of Oakland Building Permit number 44670 dated January 29, 1917. The project was described by the *Oakland Tribune* on February 4, 1917, with a report in the real estate section noting: "H. S. Crane, owner; Carnahan & Mulford, contractors; 2-story brick store and loft building, southwest corner Twenty-first and Broadway; $29,314.

The building’s construction was also announced in the February 1917 issue of *The Architect and Engineer*:

“Carnahan and Mulford Get Contract”

Messrs. Carnahan and Mulford, San Francisco contractors with offices at 45 Kearny street, have the contract for building a two-story store and loft building at Twenty-first street and Broadway, Oakland for H. S. Crane. Contract is close to $30,000. Wm. H. Weeks is the architect.”

The Sherman Clay Company appears to have moved into the building in the mid to late 1960s. The Sherman Clay Company was a music and musical instrument company founded in San Francisco in 1870 by Leander Sherman. Later, in 1879, Clement Clay joined him as a partner and the enterprise became known as the Sherman Clay Company. The business imported pianos and musical instruments, as well as music books and sheet music for sale in California. It also manufactured pianos and church organs from its own factory. As the firm expanded there were stores in Oakland, Fresno, Stockton, and Portland, Oregon.

In 1906, the Sherman Clay Oakland Store was located at 1120 Broadway at the corner of 13th Street. After the earthquake and fire of 1906 wreaked havoc on downtown San Francisco, the Sherman Clay company records were salvaged and taken to the Oakland store. In 1910, the Oakland store had relocated to 14th Street. The 1950 Oakland City Directory has the Sherman Clay building at Broadway and Hobart (now 21st Street), in a building designed for the company by Wurster, Bernardi and Emmons in 1947 (no longer extant). That building, 2101 Broadway, was replaced by the bank structure that sits at the corner of Broadway and 21st Street (now vacant).

The 1967 Polk’s Oakland City Directory lists the Sherman Clay store located at the building at 2135 Broadway. It is unclear when they moved from the building designed for them by Wurster, Bernardi and Emmons at Broadway and 21st Street.

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61 City of Oakland Building Permit Number 44760 - January 26, 1917; M. S Crane, owner; W. H. Weeks, architect.
62 *The Oakland Tribune*. Sunday, February 4, 1917, Real Estate Section Page 55. (newspapers.com)
Architect / Designer
William Henry Weeks was a prolific, well-known California architect. Over the course of his career, Weeks designed more than 500 buildings including libraries, schools, churches, courthouses, hospitals and private residences in Central and Northern California. He is particularly remembered for well-designed schools and his Carnegie Libraries throughout the state. Weeks’ other Oakland projects include: the First Christian Church (111 Fairmount Avenue), the Lake Merritt Hotel (1800 Madison Avenue), the Leamington Hotel (1814 Franklin), and the Melrose Branch Library, a Carnegie Library (4805 Foothill Boulevard).64

Recent Use by University of Creation Spirituality and Matthew Fox
From 1996 to 2005, the Sherman Clay building was home to the University of Creation Spirituality operated by religious leader Matthew Fox. Fox, a former Roman Catholic priest, and later an Episcopal priest is a proponent of Creational Spirituality, which rejects Catholicism's "Original Sin" beliefs and embraces the purity of human nature. Fox's beliefs in this regard resulted in his ex-communication from the Catholic Church. His less than ten-year association with the Sherman Clay building was after his founding of the University of Creation Spirituality and the school has subsequently moved to Boise, Idaho under the direction of a new leader. Fox’s doctrine of Creation Spirituality did not originate while at the Sherman-Clay building, his teachings of Creation Spirituality began in 1976, when he founded a religious institute during his 12-year professorship at Holy Names University.65

California Register of Historical Resources Evaluation
California Register Criterion 1: Event or Patterns of Events
Based on historical research, the building at 2131-2147 Broadway in downtown Oakland, California does not qualify individually under California Register Criterion 1: Event/Patterns of Events, for either its association with the development of downtown Oakland or with a specific commercial enterprise in Oakland. While these are certainly historical contexts or events that could be linked to this building, no specific event or pattern of events was linked to this building. It does not possess an association with an important event that would elevate it to a level of significance to justify individual eligibility for the California Register.

California Register Criterion 2: Important Person(s)
Based on historical research, the building at 2135-2147 Broadway is not associated with any individuals who have had an important role in local, California or national history. It does not appear to have been built for an important Oakland business entity and the building does not possess significant links to important persons or events. Its association

with the Sherman Clay Company appears to have begun in the mid-1960s and it was not built specifically for that enterprise as a music showroom. Matthew Fox’s use of the building for nine years from 1996 to 2005 does not elevate the building to possessing individual significance. Fox’s initial important religious writings were not crafted in this building and the recent use of the building by his University of Creation Spirituality does not rise to a level of exceptional significance as being less than 50 years old. There does not appear to be a link between the owners or designers of this building and any significant historical events relating to Oakland history. The building does not appear to qualify be individually eligible under California Register Criterion 2: Important Person(s).

**California Register Criterion 3: Design/Construction/Architecture**

While the building at 2135-47 Broadway was designed by an important California architect, William H. Weeks, the structure is not among one of Week’s most significant works. The structure has been altered at the storefront level which has impacted its overall integrity. As such, the commercial building at 2135-47 Broadway does not appear to be individually eligible for the California Register of Historical Resources under Criterion 3.
2100 Telegraph Avenue

Summary Information
The Telegraph Plaza Public Parking garage at 2100 Telegraph Avenue was constructed in the 1970s (exact date unknown); however, the Certificate of Occupancy is dated September 13, 1978. The OCHS files show no record of architect and builder; however Oakland Building Department records indicate the structure was designed by architects Van Bourg-Nakamura (known as VBN) and the contractors were Branagh, Inc. It is two stories in height and trapezoidal in plan. The building provides open air parking with corner walls are of concrete construction.

The partnership of VBN was established in the early 1950s. The firm was known for several key projects including: collaboration with Minoru Yamasaki on the Japanese Cultural and Trade Center in San Francisco for the San Francisco Redevelopment Agency (1968), the Library Tower at San Jose State University (1971), and additions to McLaughlin Hall at the University of California Berkeley (1959-1962). Mitchell J. Van Bourg’s obituary stated that he studied at the University of California, Berkeley then with Walter Gropius at Harvard University in the late 1940s. He returned to the Bay Area in the 1950s, establishing his practice with Nakamura. Van Bourg died in November 2016.68 Nobaru

“Nobby” Nakamura served in the Military Intelligence Service during World War II and then attended the University of California, Berkeley. Nakamura died in April 2016.  

California Register of Historical Resources Evaluation

California Register Criterion 1: Event or Patterns of Events

Based on historical research, the structure at 2100 Telegraph in downtown Oakland, California does not qualify individually under California Register Criterion 1: Event/Patterns of Events, for either its association with the development of downtown Oakland or with a specific commercial enterprise in Oakland. While these are certainly constructed in the late 1970s, the building does not appear to have a specific link to BART development. The project was a city-sponsored parking structure, likely for use by city employees. No important historical contexts or events that could be linked to this building, and no specific event or pattern of events was linked to this building. It does not possess an association with an important event that would elevate it to a level of significance to justify individual eligibility for the California Register.

California Register Criterion 2: Important Person(s)

Based on historical research, the building at 2100 Telegraph is not associated with any individuals who have had an important role in local, California or national history. It does not appear to have been built for an important Oakland business entity and the garage does not possess significant links to important persons or events. There does not appear to be a link between the owners or designers of this structure and any significant historical events relating to Oakland history. The structure does not appear to qualify individually under California Register Criterion 2: Important Person(s).

California Register Criterion 3: Design/Construction/Architecture

Oakland Building records contained considerable correspondence about cast concrete columns and “precast ‘trees’” that “do not fall under a ‘typical’ design code requirement”. However, the structure at 2100 Telegraph does not appear to embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possesses high artistic values. While the partnership of VBN architects completed several important commissions throughout the Bay Area, this building does not represent one of their more important or key designs. Therefore, it does not appear to be individually eligible for the California Register under Criterion 3.

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VI. OVERVIEW OF SURROUNDING PROPERTIES

The following section presents a summary of the properties surrounding the project site and within an approximate one or two-block radius, or within view from the subject property. The information in this section was collected from files at the Oakland Cultural Heritage Survey (OCHS) at the City of Oakland. Building files maintained by the OCHS sometimes include Building Permit Research Forms, which show information on architect and builder, as well as permitted alterations.

517-523 22nd Street

The building at 517-523 22nd Street is an 1898-99, four-family, Georgian-Revival residence. The OCHS files show no record of an architect and/or builder. The building is two stories in height (over a basement) and rectangular in plan. Exterior walls are wood frame. The current OCHS Rating is C1+ (Secondary Importance: Superior or visually important example, or very early [pre-1906]. Category C buildings "warrant limited recognition"). The building is located within an API (Cathedral District) and is considered a contributor to this API. As a contributor to the API, this building would be considered an historical resource under CEQA. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS, and thus it continues to contribute to the Cathedral District API.
524 22nd Street/2201 Telegraph Avenue (First Baptist Church)

Julia Morgan’s First Baptist Church at 2201 Telegraph Avenue.

The First Baptist Church at 2201 Telegraph Avenue/524 22nd Street was designed by Julia Morgan in the Romanesque Revival style and construction started in 1903. It was badly damaged during the 1906 earthquake and Julia Morgan was engaged to repair the structure. It is three stories with towers flanking both ends is overall rectangular in plan. Exterior walls are sandstone and brick. The church was heavily damaged by the 1906 earthquake. Architect Julia Morgan was subsequently engaged to repair the earthquake damage and finish the sanctuary.

In his monograph on Julia Morgan, Mark Anthony Wilson notes:

The First Baptist Church of Oakland was one of Julia Morgan’s first independent designs after opening her own office. It is an imposing Romanesque Revival building at the northwest corner of Telegraph Avenue and 22nd Street, just north of downtown Oakland. The congregation had decided to move to this site from East Oakland in 1903, and another architect was hired to design the new building. But by the end of 1904, only the exterior walls were finished. The congregation decided to look for a new architect.

The church’s leadership commissioned Julia Morgan to design and finish the auditorium in January of 1906. She submitted a new set of plans, which were approved just before the 1906 earthquake. The quake did extensive damage to the existing church structure; the four corner towers were toppled and large sections of the walls had collapsed. So Morgan was asked to rebuild the entire structure. Over the next two years, she
oversaw the reconstruction of the corner towers, the gables, and the roof. She also helped choose the themes for the new stained-glass windows and picked the craftsman who completed them...The interior of the First Baptist Church of Oakland is entirely Morgan’s creation.

The OCHS Rating is A1+ (Highest Importance: Outstanding architectural example or extreme historical importance). The building is listed in the Local Register. It is located within an API (Cathedral District) and is considered a contributor. As a contributor to the API and as an individually significant structure, this building would be considered an historical resource under CEQA. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS.

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2025 Broadway (Paramount Theatre)

The Art Deco Paramount Theatre at 2025 Broadway was completed in 1930. It is irregular in plan with an entrance lobby facing Broadway and a large auditorium space behind. Exterior walls are finished concrete with terracotta details and a large blade sign at the main façade. The architect is Timothy Pflueger. The OCHS Rating is A1+ (Highest Importance: Outstanding architectural example or extreme historical importance). The building was designated a National Historic Landmark in 1977. It is listed in the California Register of Historical Resources, the National Register of Historic Places, and the local register. It is a local landmark (#9). It is located within an Area of Primary Importance (Uptown Commercial) and is considered a contributor. As a National Historic Landmark and a designated City of Oakland Landmark, this building would be considered an historical resource under CEQA. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS or since it was designated as a National Historic Landmark.
2201 Broadway/450-466 22\textsuperscript{nd} Street (Breuner Company Building)

The Breuner Company building at 2201 Broadway.

The Art Deco Breuner Company Building at 2201 Broadway was completed in 1931. The architect was Albert Roller, and the builder was P.J. Walker. It is rectangular in plan and eight stories in height. Exterior walls are reinforced concrete with Gladding-McBean glazed terracotta. Architect and engineer Albert Roller chose the latest 'modern' design for the exterior. The reinforced concrete frame, faced with transparent glazed light green terra cotta rests on a base of polished black granite. The tile is incised with abstract floral designs at the parapet; over the east doorways, workers are depicted finishing a wooden chair; over the south entrance are depicted a bench and a high-backed chair. The store was founded by John Breuner, a German immigrant who lived in Cincinnati before establishing his California furniture store in Sacramento in 1856.\textsuperscript{69}

The OCHS Previous Rating is A3 (Highest Importance: Outstanding architectural example or extreme historical importance). The building is listed in the Local Register. It is not located within a historic district or an API. This building, with a high rating in the OCHS, would be considered an historical resource under CEQA. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS.

2211-2221 Broadway/407-417 West Grand Avenue (Hofbrau Building)

The commercial structure at 2211-21 Broadway.

The commercial building at 2211-2221 Broadway was completed in 1933. The architect was Reed & Corlett; the builder was F.A. Muller. It is two stories and rectangular in plan. Exterior walls are concrete with brick veneer in some areas. The OCHS Rating is Dc3 which means of Minor Importance: Representative example. The c means condition “if restored” (contingency rating) and the 3 means the building is not located within a historic district or an API. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS.
2003-2009 Telegraph Avenue (Santa Fe/Continental Trailways Bus Depot)

The small-scale commercial structure at 2003-09 Telegraph Avenue.

The former Santa Fe/Continental Trailways Bus Depot at 2003-09 Telegraph Avenue is a 1948 commercial building. The architect was Carl S. Replogle, and the builder was F.H. White. It is one story in height and rectangular in plan. Exterior walls are concrete with terracotta and brick veneer details. The OCHS Rating is *3 (less than 45-years old at the time of the survey, not in a historic district). The building is not located within a historic district or an API. While this building is now more than 50 years in age, it has been covered recently applied decorative painting and graffiti. It is not located on the project site and has not been fully evaluated for this study.
2022 Telegraph Avenue

The small-scale commercial structure at 2022 Telegraph Avenue was built in 1948. The OCHS files show no record of an architect and/or builder. It is one story in height and rectangular in plan. Exterior walls are masonry. The OCHS Rating is F3 (less than 45 years old or modernized). The building is not located within a historic district or an API. While this building is now more than 50 years in age, it has been covered recently applied decorative painting and graffiti. It is not located on the project site and has not been fully evaluated for this study.
2025-2035 Telegraph Avenue

The small-scale commercial structure at 2025 Telegraph Avenue.

The commercial building at 2025 Telegraph Avenue was completed in 1968. The builder is Hugo Muller Construction. The OCHS files show no record of architect. It is one story in height and T-shaped in plan. Exterior walls are concrete block. The OCHS Rating is F3 (less than 45-years old at the time of the survey) and the building is not in a historic district. While this building is now more than 50 years in age, it is not located on the project site and has not been fully evaluated for this study.
2040 Telegraph Avenue

The small-scale commercial structure at 2040 Telegraph Avenue.

The commercial building at 2040 Telegraph Avenue was completed in 1960. It is one story in height and rectangular in plan. The architect was Marshall, Welsh, McDonald; the builder was W. Barrett & Son. Exterior walls are masonry and glass. The structure has not received an OCHS Rating. It is not located in a historic district or an API. While this building is now more than 50 years in age, it is not located on the project site and has not been fully evaluated for this study.
The YMCA building at 2101-2115 Telegraph Avenue was first built in 1909, with two stories added a few years later.

The YMCA at 2101-2115 Telegraph Avenue was completed as a five story building 1909-10. The architect was William C. Hays and the YMCA was listed as the builder on the original building permit. Several years later two additional stories were added. The building is U-shaped in plan. Exterior walls are brick. The OCHS Rating is A3 (Highest Importance: Outstanding architectural example or extreme historical importance; not in a historic district). The building is listed in the Local Register. It is not located in a historic district or an API. This building has a high rating in the OCHS and would be considered an historical resource under CEQA. Based on recent field observations, the building has not been significantly altered or changed since it was originally inventoried by OCHS.
2200 Telegraph Avenue

The gas station at 2200 Telegraph Avenue has a large canopy over the pumps.

The gas station at 2200 Telegraph Avenue was completed in 1987. The OCHS files show no record of architect and builder. It is one story in height and rectangular in plan. The OCHS Rating is F3 (less than 45 years old) and the building is not located within a historic district or an API. This building is less than 50 years in age, not located on the project site, and has not been fully evaluated for this study.
2225 Telegraph Avenue

The gas station at 2225 Telegraph Avenue has a small masonry structure.

The gas station at 2225 Telegraph Avenue was completed in 1963. The OCHS files show no record of architect and/or builder. It is one story in height and rectangular in plan (there are two separate canopy structures covering filling stations). The OCHS Rating is F3 (less than 45 years old). The building is not located within a historic district or an API. While this building is now more than 50 years in age, it is not located on the project site and has not been fully evaluated for this study.
VII. BIBLIOGRAPHY

Bay Area / Oakland History and Architectural History


Essel Environmental Consulting, *Phase I Environmental Site Assessment, 495 22nd Street, Oakland, CA*, June 30, 2015


Polk’s City Directories Oakland, California, various years. Oakland Public Library and online.


**General Architectural History, Style Guides & Modernism**


**Googie Architecture and Kwik Way**


*Oakland Tribune*. Joe Maloney “of the new Kwik Way hamburger shop out 14th.” June 18, 1953. 18, Col 5.


**Individual Architects and Building Types**


Los Angeles Conservancy. Pereira focused webpage. www.laconservancy.org/architects/william-pereira


Mitchell Van Bourg Obituary *San Francisco Chronicle* November 16, 2016.

Noboru “Nobby” Nakamura Obituary San Francisco Chronicle April 29, 2016;

Oakland Public Library. Oakland History Room. Clippings File: Oakland Banks.


Pacific Coast Architecture Database. http://pcad.lib.washington.edu/


University of California, Berkeley. College of Environmental Design Archives.


Regulatory Framework


California Code of Regulations, Title 14, Chapter 3, Article 5. California Environmental Quality Act.


City of Oakland. CEQA Thresholds of Significance. Updated May 2013.

City of Oakland. Oakland Cultural Heritage Survey. Files on individual buildings.

City of Oakland. Zoning Map.


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Appendix A: Relevant 1899 Oakland Sanborn Fire Insurance Map Sheets
Relevant 1899 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
Relevant 1902 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
Relevant 1912 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
Relevant 1935 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
Relevant 1951 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
Sanborn Map updated to 1951
Relevant 1970 Oakland Sanborn Fire Insurance Map Sheets
2100 Telegraph – Eastline Project EIR
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