



December 6, 2017

By Electronic Transmission

City of Alameda  
Historical Advisory Board  
2263 Santa Clara Avenue  
Alameda, CA. 94501

**Re: Demolition of pre-1942, Non-Study List Buildings--Proposed delegation of Certificate of Approval authority to staff (Item 7-B on HAB 12-7-17 Agenda)**

Dear Boardmembers:

**The Alameda Architectural Preservation Society (AAPS) recommends that the existing procedure be left as it is.** There appears to be a large number of pre-1942 properties excluded from the historic building Study List (a) because they were not studied or recognized at the time of the 1978-79 survey or (b) due to incompatible exterior alterations, such as: new siding overlaying the original siding; removal of ornamentation, porches and other elements; incompatible window replacements; etc. In fact, it was the proposed demolition of a non-Study List Victorian house at 1423 Morton Street which was covered with asbestos shingles (see attached photo) that triggered the 2003 amendment to the historic preservation ordinance requiring demolition review for all pre-1942 buildings.

Most of these altered buildings can be restored. (See attached "before" and "after" pictures of 2111 Lincoln Avenue.) However because many of them are unattractive in their current condition and, in some cases, their original architectural character is not obvious, we are concerned that delegating the determination to staff of whether such buildings qualify for the Study List will cause many of these buildings to fall through the cracks.

In addition, some non-Study List pre-1942 buildings were excluded from the Study List by mistake, such as the incorrect entry of the address of an adjacent property rather than the correct address. Delegating responsibility to staff to correct these kinds of clerical errors puts these buildings at greater risk than under the current procedure.

There are also buildings that were excluded from the Study List due to alterations but later restored, such as 2111 Lincoln, which are still not on the Study List.

Finally there are the buildings that were identified as significant in the 1988 Waterfront Survey (such as the Alameda Marina structures that were recently reviewed by the HAB) that should have been added to the Study List after completion of the Survey, but never were. **The HAB should add these buildings to the Study List as soon as possible.**

We are especially concerned regarding projects involving substantial or total demolition, as was the case with 1443 Morton Street. **The HAB should, at a minimum, consider retaining its review authority for cases involving a higher demolition threshold, perhaps 60%.**

Although we recognize that the current planning staff has generally been very sensitive to Alameda's historic buildings and recognizing their character-defining features, there is no assurance that this sensitivity will continue with future staff

We appreciate the situations involving pre-1942 properties that have minimal historic or architectural value, such as the Garden Street case that the HAB considered at its October, 2017 meeting and which appears to have triggered the subject proposal. However, as stated in the staff report, these marginal properties come before the HAB infrequently. It is the only such case in 2017. Our review of recent years indicates no such cases in 2016, one in 2015, none in 2014, two in 2013 and none in 2012. Moreover, the 2015 case involved extensive HAB and public discussion which led to major design changes. In addition, one of the 2013 cases involved a Victorian house that should have been included on the Study List and which also involved extensive public and HAB discussion that led to significant design changes. Finally, the second 2013 case involved total demolition of an altered Victorian house that was withdrawn just before the HAB hearing, apparently because the applicant concluded the Certificate of Approval would be denied.

Staff has previously advised us that HAB referral of cases involving demolition of over 30% of the building's value has acted as an incentive for applicants to design their projects to avoid exceeding the 30% threshold. We were therefore surprised that the subject proposal is now being considered, since it would seem that its adoption would eliminate this incentive to keep demolitions under 30%.

**Notwithstanding the above, if the HAB is inclined to adopt the proposal, we recommend that it be modified as follows:**

1. Notify the HAB of application submittals at the **beginning** of the public comment period as well as notifying the HAB of the staff decision. Allow HAB members to issue a call for review following initial notification. This could shorten the call for review process by as much as 20 days.
2. List Certificate of Approval applications and decisions as part of the design review report on Planning Board agendas. This will allow members of the public (including AAPS), in addition to neighboring property owners, to be informed of these applications and submit timely comments to staff and the HAB. Otherwise, it will be difficult for AAPS and other interested parties (other than neighboring property owners) to be informed of these proposals. The design review report should probably group the Certificate of Approval applications under a separate category and make clear that they are subject to call for review by the HAB rather than the Planning Board.
3. Finding iv. (concerning integrity) of the Study List eligibility criteria as set forth in the draft resolution should be applied in a manner that presumes altered, but originally significant, buildings are restorable and still have integrity for purposes of Finding iv until proven otherwise. **The resolution should include a statement directing this interpretation of Finding iv.** Alternatively, it may be simplest to just delete this Finding.
4. Related to Item 3 above, staff should always require that newer incompatible siding be selectively removed to preliminarily determine the existence and condition of any underlying original siding.

Although staff has advised that they are already doing this, **the procedure should be memorialized in the resolution to help ensure that future staff also follows it.**

5. As noted above, some non-Study List pre-1942 buildings were excluded from the Study List by mistake. In cases where staff believes a good case can be made to add buildings to the Study List because of clerical errors or other oversights or based on item 3 above, staff should be empowered to provisionally add the property to the Study List subject to referral and confirmation by the HAB. **This process should be included in the resolution.**

If it is desired to minimize unnecessary Certificates of Approval, whether issued by staff or the HAB, a more direct and less problematic approach would be to amend the Historic Preservation Ordinance definition of demolition from the 30% of value criterion to a percentage of removal of exterior walls and roofs, with minimal removal of facades and roofs that are visible from the public right-of-way. Good language for this approach was included in the various drafts of the revised historic preservation ordinance prepared over the past 10 years.

Thank you for the opportunity to comment. Please contact me at 510-523-0411 or [cbuckleyaicp@att.net](mailto:cbuckleyaicp@att.net) if you would like to discuss these comments.

Sincerely,

Christopher Buckley, Chair  
Preservation Action Committee  
Alameda Architectural Preservation Society

Attachments: Photo of 1423 Morton Street  
Photos of 2111 Lincoln Avenue before and after restoration

cc: Debbie Potter, Andrew Thomas, Allen Tai, Nancy McPeak and Erin Garcia (By electronic transmission)  
AAPS Board and Preservation Action Committee (By electronic transmission)