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Subject: NOP for Redevelopment Project: 800 K and L Street

The Boulevard Park Neighborhood Association (BPNA) requests that the Environmental Impact Report (EIR) include, in addition to the two proposed in the draft NOP, a third alternative to preserve or rehabilitate the Bel-Vue Apartment Building, a listed Sacramento historic landmark. The Boulevard Park Neighborhood Association represents a neighborhood with numerous listed historic structures and it has worked for many years to ensure that Sacramento's elected officials take seriously the importance of those structures and other important historic structures in downtown Sacramento and adjacent neighborhoods as the City of Sacramento reviews and decides whether to approve development proposals affecting them. BPNA requests inclusion of a preservation alternative for the Bel-Vue for the following reasons:

- The building is still viable: all of the buildings on the site were inhabited until last year and are in reasonable condition. A working restaurant still occupies the bottom floor of one.
- Historic buildings give Sacramento its character. Rather than a generic downtown, such as was created in many cities during the redevelopment drive of the 60s, Sacramento was fortunate (and/or wise) in retaining much of its historic downtown fabric, which has real economic value. The successful rehabilitation of historic buildings that now house the Sheraton Hotel, Zocalo's, McCormick & Schmicks, PF Chang's, and the Citizen Hotel, as well as the Globe Mills and the Firestone Building, all demonstrate how the character and beauty of historic buildings create sound value, give Sacramento its unique signature as a city, and increase its attraction for the tourist and entertainment industries.
- Many studies show that restoration or rehabilitation, if the buildings are viable, is less expensive: rehab requires less material but delivers the same or better returns.
- The City's historic landmark listings need to have meaning, especially in light of Sacramento's status as a Certified Local Government under preservation law. We know that demolition of old buildings is sometimes appropriate. However, serious consideration of reservation or rehabilitation of listed buildings should always be the first step in any city project and environmental document.
- While parking is at a premium in downtown, so is the need for residential units. It is well-documented in planning literature that the key to a vibrant downtown is having a residential population, that can keep businesses going 24/7. K Street certainly needs some help and a hotel could be the answer to help, but a parking garage over an historic building is not the right direction, especially when downtown in general and K Street in particular lack residential opportunities.
- Development projects are always a risk. The City already has a number of vacant lots where demolition happened in advance of a project that never materialized.

On a separate note, we request serious consideration in all alternatives of protecting the underground sidewalks along K & 8th Streets, a potential historic district under consideration in

Sources on Historic Preservation and Sustainability

1. "The State of California learned the potential savings from historic preservation in comparing the construction of two State Office Buildings: the new Ronald Reagan State Office Building on Spring Street at 3rd St., and the Junipero Serra State Office Building just two blocks away on Broadway at 4th St., in the renovated former flagship location of the Broadway Department Store. The historic renovation not only reused and reinvigorated an important landmark from 1914, but it saved taxpayers money by delivering office space at about half the cost per square of the all-new Reagan building just a few years before." From The Top Ten Myths About Historic Preservation by Ken Bernstein, manager of the City of Los Angeles Office of Historic Resources. <http://www.laconservancy.org/preservation/Top%20Ten%20Myths%20About%20Historic%20Preservation.pdf>

2. From the National Trust: "If constructing a new building requires demolition of a significant existing structure, the cost savings from rehabilitation will be between 3% and 16%." [<http://wyoshpo.state.wy.us/Events/Basic/HeritageTourism&EconomicDevelopment.pdf>]

3. "...The rehabilitation of older and historic buildings is particularly potent in this regard. As a rule of thumb, new construction will be half materials and half labor. Rehabilitation, on the other hand, will be 60 to 70 percent labor with the balance being materials." From Donovan Rypkema's article, "**Economics, Sustainability, and Historic Preservation**," in the *Forum Journal*, Winter 2006, Vol. 20, No. 2.

4. "...Sixty to 65 percent of most landfill sites are made up of construction debris. And much of that waste comes from the razing of existing structures. **Preserving instead of demolishing our inventory of historic buildings reduces that construction waste.** Preserving instead of demolishing our inventory of historic buildings is Smart Growth." From Donovan Rypkema's speech **Historic Preservation Is Smart Growth** on March 3, 1999, at the National Audubon Society of New York's Conference on Smart Growth,

5. Also, in order to weigh apples to apples for project costs, the cost of new construction needs to include the cost of removing the debris from the demolished building and preparing the site for new construction. Also, the cost of the embodied energy of the historic building that was removed (the cost of the materials that are removed. The breakdown of cost to labor is different for old buildings (more costs are in labor--putting people to work and less to materials). New buildings it's more cost in new construction (more materials than labor).

6. "...Embodied energy is defined as the total expenditure of energy involved in the creation of the building and its constituent materials. When we throw away an historic building, we are simultaneously throwing away the embodied energy incorporated into that building. How significant is embodied energy? In Australia, they've calculated that the embodied energy in the existing building stock is equivalent to ten years of the total energy consumption of the entire country.

Much of the "green building" movement focuses on the annual energy use of a building. **But the energy embodied in the construction of a building is 15 to 30 times the annual energy use.** Razing historic buildings results in a triple hit on scarce resources. **First, we throwing away thousands of dollars of embodied energy. Second, we are replacing it with materials vastly more consumptive of energy.** What are most historic structures built from? Brick, plaster, concrete and timber. What are among the least energy consumptive of materials? Brick, plaster, concrete and timber. What are major components of new buildings? Plastic, steel, vinyl and