

From: [Lara Weisiger](#)
To: [Jennifer Warner](#); [Steven Buckley](#); [Brian McGuire](#)
Subject: FW: [EXTERNAL] Public Comment for HAB Item (2026-5733 PLN24-0145) 3/5/26
Date: Wednesday, March 4, 2026 1:42:15 PM
Attachments: [Verplanck Block 11.pdf](#)
[Public Comment 03-05-2026 Radium Project.pdf](#)
[Public Comment 03-05-2026 Radium Projectv2.pdf](#)

From: Shelby S <sheehan.shelby@gmail.com>

Sent: Wednesday, March 4, 2026 1:38 PM

To: City Clerk <CLERK@alamedaca.gov>; Sunny Tsou <stsou@alamedaca.gov>; Andy Wang <awang@alamedaca.gov>; Xiomara Cisneros <xcisneros@alamedaca.gov>; Hanson Hom <hhom@alamedaca.gov>

Subject: [EXTERNAL] Public Comment for HAB Item (2026-5733 PLN24-0145) 3/5/26

Please see attached public comment for the Radium Project for the upcoming Historical Advisory Board Meeting

The Comment contains excerpts from the governing regulations for this Project with page numbers and quotes intended for use as a reference.

Thank you,

--

Shelby
510-435-9263

"The righteousness of the oppressed will not go unheard."

This Public Comment is submitted for the Historical Advisory Board meeting of March 5, 2026. The discussion begins a discussion of issuance of a Certificate of Approval under CEQA Guidelines §15064.5. The Comment then provides a collection of relevant excerpts of the governing regulatory framework for the Radium Project—including the Zoning Code, General Plan, CEQA (Guidelines §§15162 and 15183), and the 2012 Public Trust Exchange Agreement—and demonstrates that the proposed development cannot lawfully be located on the historic taxiway.

Dear Board Members,

I am writing to formally oppose issuance of a Certificate of Approval for the proposed Radium Theater Project at Alameda Point (2026-5733 PLN24-0145). The applicant’s “Consistency Analysis” conclusion that the Project “appears to comply with all 10 of the Standards” misleading and contradicted by the Report’s admission that the Project will alter character-defining historic features, reaching a conclusion not allowed under the scope of the Report; and therefore cannot support the findings required for approval under AMC § 13-21.

Further, this Project will materially alter the Hangars Area, and risk federal de-listing of the entire Subarea. Additionally, the Project is inconsistent with every applicable law, including at the federal, state, and local level--and cannot be lawfully located at the proposed location.

The proposed 2+-acre theater Project is located within the Historic District, immediately west of Pan Am Way, occupying the full 200-foot north–south depth of the historic taxiway at this location and extending to the edge of the Seaplane Lagoon Promenade. With a dominating footprint of rising 50–75 feet in height, the structure privatizes approximately one acre of land with a continuous concrete mass and a theater-entry plaza, roadway, parking and trash area on the historic taxiway, obstructing public access to what is currently an open space waterfront, forcing pedestrian traffic circulation to move around it, and obstructing views both internally and externally from every angle.

The taxiway, buildings, axial relationships, panoramic views across to the San Francisco skyline, and the broad horizontal vistas framed by the Hangars along West Tower Avenue toward the Lagoon are recognized character-defining features included in the National Register nomination, the **Alameda Point EIR**, the **Historic Preservation Ordinance (§ 13-21)**, and the **2014 Town Center and Waterfront “Precise Plan”** (p. 38). The Precise Plan was incorporated into the **Zoning Code** under **§ 30-4.24 (Ordinance 3101)**,

Zoning regulations adopted by Ordinance have the force of law and bind the City as well as private applicants. Compliance is mandatory; the City lacks authority to approve a project that violates its own codified standards.

More important, under the **2012 Public Trust “Exchange Act” (Cal. Const., art. X, § 4)** and **AMC § 30-4.24.c.vi, (Ordinance 3088)** the City has an independent, *state-mandated*,

ongoing requirement to enhance and expand public access and protect physical and visual access corridors to the Bay,

Summary

The scale and placement of the structure and accessory build-outs are inconsistent with the City’s constitutional and statutory obligations to maintain an open, park-oriented waterfront. The Project’s use and development of a private commercial theater on the historic waterfront, abutting Public Trustland in the Historic Preservation District cannot be lawfully approved due to the numerous layers of land use restrictions at the site.

Further, violation of the Exchange Act violates state law and voids any local approval beyond its authority, rendering it as a nullity incapable of conferring any vested rights, subjecting the City to penalties and withholding of state funds.

The Exchange Act, Alameda Point zoning framework, Waterfront Plan, and Site A development controls preserve protected view corridors and assume limited, subordinate infill development within the Taxiway Sub-Area—not a one-acre, 50–75-foot structure occupying the historic apron foreground abutting against the Public Trust boundary.

The Waterfront Precise Plan expressly emphasizes that *“Alameda Point and the Seaplane Lagoon provide opportunities for multiple dramatic waterfront parks with remarkable views that are truly unique to this location.”* (p. 85.)

Pan Am Way 1-acre Park Mandate. The Precise Plan further mandates *“a minimum of 1 acre in size that extends from Pan Am Way to the waterfront, with a minimum width of 150”* (p. 102). A plaza entry directing waterfront visitors into or around the theater is not compliant with the Plan. Adjacent buildings are intended to be small in scale and “activate the Plaza,” not replace it with enclosed private development.

That requirement establishes the taxiway foreground as a continuous, publicly accessible open space extending from Pan Am Way to Seaplane Lagoon and an entry park that encourages waterfront activity, not an indoor theater. A private structure of this magnitude does not “activate” the Plaza; it displaces it. The Project therefore conflicts with the mandatory spatial configuration established in the Precise Plan and incorporated into AMC §30-4.24.

Improper CEQA Determination. The City has determined that no further environmental review is required under CEQA Guidelines §§15162 and 15183 on the premise that the Project is consistent with prior environmental review and the governing land use framework. The Project conflicts with every applicable land use document and regulatory plan governing Alameda Point, materially alters protected historic character-defining features, and violates

Public Trust restrictions applicable to the shoreline interface. Therefore, reliance on §§15162 and 15183 is therefore improper.

Conflicts. Given that there are acres upon acres of vacant developable land immediately east of Pan Am near the Ferry, and the legal barriers to this location, it begs the question of why the hard push to a theater where the proposed site.

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The following Sections address the governing regulatory framework for the Radium Project—including the Zoning Code, General Plan, CEQA (Guidelines §§15162 and 15183), and the 2012 Public Trust Exchange Agreement. The regulations herein are conceptually consistent and demonstrate that the proposed development cannot lawfully be located on the historic taxiway. These Sections contain essential information to support your legal responsibilities to make independent findings so as to not rely on staff or applicants potentially biased assertions. It has embedded links to planning documents, and direct quotes with page numbers for your reference. I hope you find it helpful as a reference.

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1. CERTIFICATE OF APPROVAL CANNOT LAWFULLY BE ISSUED

AMC § 13-21.5(b)(1) provides that the Historical Advisory Board shall determine whether to issue a Certificate of Approval for repairs and alterations to Historical Monuments based on whether the plans and specifications meet the standards established by the Historical Advisory Board and the Secretary of the Interior’s Standards for Rehabilitation.

The City Lacks Required Infill Guidelines. As an infill Project, the Historical Advisory Board has yet to develop and approve comprehensive infill guidelines as required pursuant to AMC § 13-21, and the most recent “draft” from City staff was rejected as too broad, and insufficient to guide infill development. On that alone this project is premature, and no infill projects should be approved in the interim.

However, the Waterfront Precise Plan provides a partial framework that is informative. Regarding issuance of a Certificate of Approval for this Project, the Waterfront Precise Plan plans: “...the Taxiway Sub-area provides infill development compatible with the NAS Alameda Historic District and features a distinctive waterfront park as a regional attraction.” (p.10) and

...“Redevelopment within this zone is controlled to preserve character-defining view corridors and to relate to the massing and spacing of the historic Hangar structures”.(p. 29)

These guidelines demonstrate how the Secretary of the Interior’s Standards must be applied to interpret preservation requirements concerning the waterfront setting, building compatibility, and protected view corridors and spatial relationships, and confirm that alteration that degrades the integrity of those features is inconsistent with the Standards.

Evaluation of Applicants Compliance Analysis Report

Architectural Resources Group, Inc. (ARG) prepared the January 22, 2025 Secretary of the Interior’s Standards Compliance Analysis for the proposed Project. The report expressly recognizes “alterations” to character-defining features, then concludes that it “*appears compliant with all ten of the Standards*”(p.3) However, as summarized below and detailed in Attachment 1, that conclusion is not supported by the Report’s own findings or by substantial evidence in the record.

Preparers Qualifications The preparers’ qualifications are identified as Historic Architecture and Architectural History but do not include a preparer with specialized expertise in **Historical Landscape Architecture**. That absence is reflected in an analysis that focuses primarily on façade treatment rather than a meaningful evaluation of the building’s scale, massing, spatial placement, and required subordination to surrounding historic structures within the District, and protection of view corridors and access to the waterfront.

Admission of Alterations to the Historic District Contradicts Report’s Conclusions

The Applicant’s Report (Exhibit 4) itself admits that the Project alters character-defining features of the Hangars and Seaplane Lagoon subdistrict:

“...as introduced in the discussion of Standard 9,...the proposed project will introduce some alterations to some character-defining spaces and spatial relationships that characterize the historic district. “

“...Namely, paved open spaces without obstructions; orthogonal layout of roads and buildings; east-west views along West Tower Avenue and along the row of Seaplane Hangars; and panoramic views west from the Seaplane Hangars across the Airfield and south from the Seaplane Hangars across the Seaplane Lagoon.”(p.17)

Yet, in the very next paragraph, without analysis, the Report narrows the impact to “...*the panoramic views to the south from the Seaplane Hangars across the Seaplane Lagoon,*” which the report characterizes acceptable because of “...*other open spaces*” in the district”.

The Report then concludes that the Project “*appears to comply with all 10 Standards*” even though the Report explicitly stated character-defining historic features would be altered. These statements cannot be reconciled.

This reflects the “Cardinal Sin” of a piecemeal approach to preservation allowing degradation. Character-defining features are not interchangeable; each incremental removal degrades the District as a whole.

As quoted above, the Report expressly acknowledges “alteration” of multiple character-defining spatial relationships—including obstruction of open apron conditions and flat topography, disruption of the orthogonal layout, and destruction of panoramic views. At the point where these alterations are identified, the Standard has not been met.

Improper Dismissal of Significant Unavoidable Impacts

It is beyond the scope of the Report to make conclusions, yet the Report reduces the acknowledged alterations to a purported partial obstruction of a “*single panoramic views*” and labels the impacts “limited” and replaceable, without demonstrating how the defining spatial framework of the District remains intact.

The Reports characterization and “reduction” of impacts is inappropriate under the scope of this analysis. It ignores the buildings dominant massing and minimizes the defining condition of uninterrupted horizontal openness from Pan Am Way across the apron toward the Seaplane Lagoon and San Francisco Bay, and along the length of the taxiway

Panoramic Vistas. Once “a single panoramic views” is segmented or visually interrupted by a substantial building mass, the spatial experience no longer functions as panoramic in character. Here, the uninterrupted view from every vantage point is materially altered.

Landscaping and Topography. , the landscaped entry Plaza itself alters the topography and “lack of vegetation” that are both character-defining features and drives pedestrian traffic either in or around the building that takes up nearly the entire North-South direction of land. The Building destroys another acre of the taxiway where a building did not historically exist.

Architecture-Landscape Integration. The new building is on formerly flat topography with uninterrupted views. The building mutes the Hangars, obstructs protected views, and interrupts the orthogonal layout, making the view from West Tower of a wall and refuse area and the accessory build-out creates a narrow alleyway for parking and traffic turn-around.

Requirements for Significance Analysis under CEQA Guidelines §15064.5(b)(1)

The unsupported statement that the Project “appears to comply” is inappropriate. By acknowledging alteration of character-defining features yet concluding overall compliance without a separate material-impairment analysis, the Report extends beyond the proper scope of a Standards evaluation and effectively collapses the distinct CEQA determination required by law.

Where compliance is not clearly demonstrated, the regulatory presumption under CEQA does not apply. At that point, Guidelines §15064.5(b)(1) requires the agency to conduct a separate full CEQA evaluation to determine significance, which is defined as:

“A project has a significant impact if it demolishes or materially alters in an adverse manner those physical characteristics that convey its historical significance.”

On its face, this Project’s impacts on character-defining features listed in their own report are significant. The Report’s “single impact” to the uninterrupted panoramic vista from east of Pan Am Way across the apron toward the Seaplane Lagoon and San Francisco Bay is one of the most significant and widely-experienced views by the public at Alameda Point.

The panoramic views within and to and from the Hangars Area is unique to the District and its obstruction would materially alter the historic spatial character of the site from every vantage point.

The orthogonal layout, lack of landscaping, and axes that frame the vistas between Hangars and flat topography are major features of the Total Base Design architecture-landscape integration. The flat topography on wide expanses of pavement preserves the spatial relationships and circulation character-defining features.

Every single character-defining feature will be destroyed by this Project, risking de-listing of a significant portion of the Historic District.

A Secretary’s Standards compliance report is limited to evaluating whether a project complies with the preservation Standards. It does not substitute for, and cannot resolve, the lead agency’s independent obligation under CEQA Guidelines §15064.5(b) to determine whether acknowledged alterations materially impair the significance of a historical resource.

Accordingly, the Report does not—and cannot—constitute substantial evidence that the Secretary of the Interior’s Standards have been satisfied. A Certificate of Approval cannot lawfully issue on the basis of these findings.

**See Attachment 1’s independent analysis of the Project for each standard.*

2. PUBLIC TRUST CONSISTENCY. CAL. CONST., ART. X, § 4

California Constitution Article X, Section 4 protects the public's right of way to navigable waters. Under the Public Trust Doctrine and the 2012 Exchange Agreement, the City holds these lands in a fiduciary capacity and must preserve and enhance both physical and visual access to the shoreline for the benefit of all people of the state.

The proposed theater is located immediately abutting lands subject to the 2012 Public Trust Exchange Agreement. The operative site plan shows the building mass abutting the 200-foot Public Trust boundary and appearing to encroach upon the existing Seaplane Lagoon Promenade linear park, contrary to the separation depicted in Exhibit 1 (p. 12). As configured, the Project removes the open apron foreground that currently functions as a buffer between private development and Trust lands.

Prohibited Privatization of the Waterfront. Development immediately adjoining Trust lands may not impair Trust purposes by controlling or functionally privatizing the shoreline edge. The structure occupies approximately one acre of the historic apron and rises between 50 and 75 feet in height at the primary public approach to Seaplane Lagoon. Associated refuse enclosures, parking, and vehicular turnaround areas further transform the former taxiway into private development at the shoreline interface, narrowing the direct, interconnected pedestrian access that currently characterizes the waterfront.

By converting the open apron adjacent to Trust lands into a private building forecourt, the Project materially alters the openness of the waterfront and the public's spatial and visual relationship to Seaplane Lagoon and San Francisco Bay.

Not a Maritime Dependent Use. Further, the use as a theater is not maritime-related nor associated with waterfront activities, which violates the Public Trust as well.

Therefore, the use, scale and placement of the theater is inconsistent with the City's constitutional and statutory obligations to maintain an open, park-oriented waterfront and must be relocated.

Regarding CEQA and local land use plans, these shoreline and access impacts materially alter the spatial and waterfront assumptions underlying prior planning documents, and cannot be deemed consistent with the previously certified EIR framework. Streamlined review under CEQA Guidelines §§15162 and 15183 is therefore improper.

3. ALAMEDA POINT PROGRAM EIR

The Alameda Point Program EIR recognized the sensitivity of development within the Taxiway Sub-Area between the Seaplane Hangars and the Seaplane Lagoon. The EIR incorporates **1999 SHPO Historic Preservation MOU** requiring "preservation" as the

highest priority within the Historic District. The EIR (p. 4.D-35) expressly states that proposed new development on the taxiways between the Seaplane Hangars and the Seaplane Lagoon would:

“...substantially change the character of this area, which is currently characterized by flat uninterrupted concrete taxiways with no roads, buildings, or landscaping...and open vistas that are character-defining features of the historic landscape,...’and “...obstruction by new construction would have a significant adverse effect on the integrity of the NAS Alameda Historic District.”

Therefore, the finding of compliance with the Secretary of Interior’s Standards for this Project is suspect and requires scrutiny. Further environmental review and a rigorous alternatives analysis is required pursuant to the AP Program EIR, and applicable law.

Alameda Point Project EIR Compliance Required

the Program EIR (4.D-35) expressly recognizes that new development on the taxiways between the Seaplane Hangars and the Seaplane Lagoon could substantially change the character of the area and that obstruction of open vistas — identified as character-defining features — would have a significant adverse effect on the integrity of the NAS Alameda Historic District.

The Consistency Analysis does not reconcile its conclusion of full compliance with the Secretary of the Interior’s Standards with the EIR’s acknowledgment that obstruction of these vistas implicates district integrity. In any case, the conclusions of compliance in the face of admitted alterations exceeds the allowed scope of analysis.

4. IMPROPER CEQA DETERMINATION/INADEQUATE CHECKLIST

Reliance on CEQA Guidelines §§15162 and 15183 is unsupported. No further review applies only where a project is consistent with the density, land use, and environmental assumptions analyzed in a prior EIR and complies with the applicable General Plan, community plan, and zoning regulations.

The proposed 50–75-foot, one-acre structure within the historic Taxiway Sub-Area materially alters identified view corridors and spatial relationships recognized in the Program EIR as character-defining and a massive building abutting the Public Trustlands was not contemplated in the EIR.

The Compliance Report expressly acknowledges alteration of those features within a National Register Historic District. The Project also conflicts with mandatory waterfront view and open space protections and departs from binding Precise Plan and zoning standards.

Under CEQA Guidelines §15064.5, alteration that materially impairs the significance of a historical resource constitutes a significant impact. Because such alteration is admitted, supplemental environmental review under §15162 is required, and streamlined review under §15183 is unavailable.

Inadequate CEQA Review and Failure to Analyze Alternatives

The Project relies on a checklist-style CEQA determination concluding no significant impacts based on prior programmatic review, without addressing the Program EIR's acknowledgment that obstruction of character-defining vistas in the Taxiway Sub-Area could result in significant and unavoidable impacts. That determination is unsupported where the Project materially alters spatial relationships within a designated National Register Historic District. The Program EIR identified obstruction of open taxiways and vistas between the Seaplane Hangars and Seaplane Lagoon as potentially significant (Section 4.D: Historic Resources). Aesthetic impacts were found less than significant only because protected viewscales would not be obstructed (Section 4.K: Visual Impacts), The Project's obstruction of those viewscales is therefore inconsistent with the assumptions and impact determinations underlying the certified Program EIR.

Under §15064.5, alteration that materially impairs the significance of a historical resource constitutes a significant impact. The Compliance Report acknowledges alteration of character-defining spatial relationships. The record contains no analysis of material impairment and no evaluation of feasible alternatives, despite the availability of non-contributing land east of the Historic District.

The proposed 50–75-foot, approximately one-acre structure obstructs historic viewscales and alters identified character-defining spatial relationships. The Project therefore departs from the assumptions underlying the Program EIR. Streamlined review under CEQA Guidelines §15183 is unavailable, and supplemental review under §15162 is required.

Alternatives Analysis

The Standards Compliance Report acknowledges alteration of character-defining spatial relationships, establishing that the Project materially affects a historic resource. CEQA therefore requires evaluation of feasible alternatives that would avoid or lessen that impact. Substantial vacant, non-contributing land exists immediately east of the Historic District, including areas near the ferry terminal that are more suitable for large-scale massing. The record contains no comparative feasibility or cost analysis of alternative locations.

Violation of California Constitution, State, and local law

The Project alters the shoreline interface immediately adjacent to lands subject to the Public Trust and materially affects physical and visual access to Seaplane Lagoon and San Francisco Bay. Under **Article X, Section 4 of the California Constitution and the 2012 Public Trust Exchange Agreement (AMC § 30-4.24.c.vi)**, the City holds these lands in a fiduciary capacity and may not authorize development that impairs Trust purposes or restricts public access.

A local land use approval that conflicts with constitutional Public Trust obligations exceeds the City's authority. These shoreline impacts were not analyzed in the streamlined CEQA review. Reliance on CEQA Guidelines §§15162 and 15183 is therefore unsupported.

5. WATERFRONT AND TOWN CENTER PRECISE PLAN/ ZONING CODE VIOLATIONS

The Waterfront and Town Center Precise Plan (2014) is incorporated into the AP-WTC zoning district (AMC §30-4.24) and functions as a legally binding land use control. It implements federal, state, and local mandates, including historic preservation and Public Trust obligations. Discretionary approvals must comply with those governing laws and with CEQA.

The Precise Plan does not override superior law. It operates within-- and must be applied consistent with-- constitutional Public Trust obligations, CEQA, and historic preservation mandates. Discretionary projects remain subject to review under those governing authorities, and the Plan expressly incorporates those requirements.

At the same time, the Precise Plan establishes binding spatial and development parameters that may not be exceeded. It does not authorize a massive, dominant privately owned structure occupying approximately one acre of the historic taxiway, altering the NAS Alameda Historic District, obstructing protected view corridors, or privatizing a substantial portion of Seaplane Plaza.

A 50-foot, one-acre theater in this location conflicts with the Plan's preservation of historic spatial organization and sightlines from the Administrative Core and exceeds the adopted development framework incorporated into AMC §30-4.24.

The Precise Plan prioritizes maximizing waterfront access, preserving view corridors to the Seaplane Lagoon, and maintaining the openness of the NAS Alameda Historic District. It emphasizes limiting privatization of the waterfront and avoiding monolithic shoreline massing, adhering to the Public Trust Exchange Agreement,

Specifically, the Precise Plan requires:

"...Alameda Point and the Seaplane Lagoon provide opportunities for multiple dramatic waterfront parks with remarkable views that are truly unique to this location" (p. 85). It describes Seaplane Plaza as an "...open space hub that affords a dramatic view and invitation to the Seaplane Lagoon...with flexible event space flanked by retail shops and integrated with the waterfront promenade"; and

"The secondary open space aligned with the Terminal Museum Building 77 offers additional flexible park and special event space...and connected to the waterfront" (p. 91).

Mandatory 1-acre Pan Am Way Public Plaza: As stated earlier,, the Precise Plan further mandates: *"the provision of a public plaza a minimum of 1 acre in size that extends from Pan Am Way to the waterfront, with a minimum width of 150"* (p. 102).

This requirement establishes the taxiway foreground west of Pan Am Way as a continuous, one-acre publicly accessible plaza extending to Seaplane Lagoon. Adjacent buildings are intended to "activate the Plaza," not replace it with enclosed private development. No driving or parking on the taxiway is contemplated in the Plan.

The proposed one-acre theater occupies the very footprint designated for that public plaza, interrupts the required 150-foot-wide open space extending to the waterfront, and introduces roadway and parking circulation on the taxiway. A private indoor structure of this magnitude displaces, rather than activates, the Plaza.

NO driving or parking is contemplated on the Taxiway in the Precise Plan, which would directly conflict with the Plan for a Public Plaza and adjoining uses "activating the Plaza" immediately adjacent to Pan Am Way.

The Project therefore conflicts with the mandatory spatial configuration established in the Precise Plan and incorporated into AMC §30-4.24. *Note the as-built configuration of Pan Am Way is different from the illustration in the Precise Plan, necessitating an adjustment of the axis of the 1-acre Plaza.*

Precise Plan Historic "Infill" Guidelines: Section D

The Plan identifies the Seaplane Hangars (Buildings 39, 40, 41), Building 77, the taxiways, the Lagoon, and Lagoon ramps as *"major contributing features of the Historic District"* (p. 38) within the boundary of the Precise Plan.

Specifically, the Precise Plan Historic Infill Guidelines(Section D) are designed to:*"... ensure that new buildings respect the historic cultural resource..." (p. 133).*

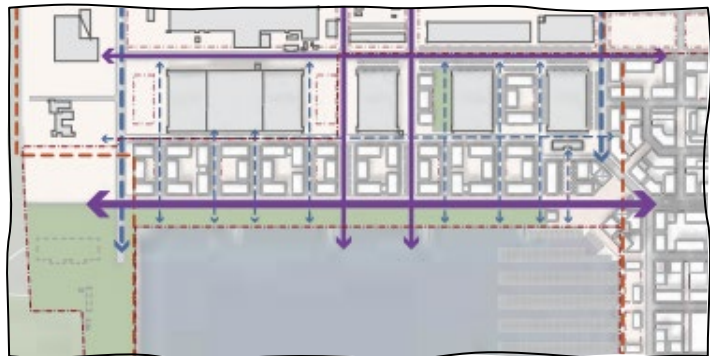
The Precise Plan guidelines require preservation of corridor views along the hangar edges from West Tower Avenue and open visual access to the Lagoon and Bay (pp. 132–133). The illustrated view corridors are derived from **Page & Turnbull (2005)** and incorporated into the zoning framework and Alameda Point EIR—preserve:

- The east–west axial view aligned with Building 77 unobstructed to Pan Am Way;
- The north–south taxiway vista;
- The hangars walls defining corridors between the Hangars to Seaplane Lagoon.

The Precise Plan configuration in front of Building 77 preserves an open foreground aligned with these axes. A three-story building wall flanking the entry corridor for the entire length of the Taxiway departs from that framework.

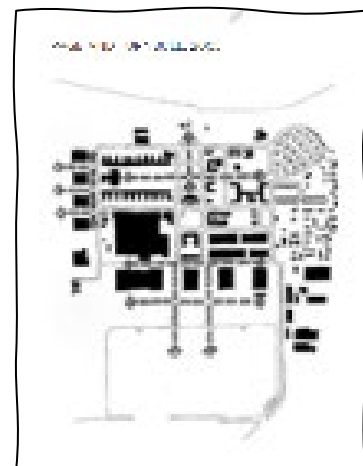
Moreover, Precise Plan build-out is not automatic. Development is permitted only if it does not degrade historic resource value, impair Public Trust obligations, or reduce public access to the waterfront.

The Waterfront Plan diagram (shown below, and in Exhibit 1, p.6, derived from Page & Turnbull, 2005, also shown below) identifies the principal historic spatial axes of the NAS Alameda “Total Base Design” and illustrates the protected view corridors incorporated into the Precise Plan and zoning framework. These axes define the historic spatial organization that infill development must preserve under the Plan and the Historic Infill Guidelines (pp. 132–133)



Lack of Compliance with the Secretary of Interior’s Standards. As shown by the Page and Turnbull Report, Taxiway east-west view extends to the entire span of the taxiway. The conflict is useful to demonstrate that the proposed development on the Taxiway would impact historic resources, and in such cases, a Certificate of Approval would not and could not find the Project was consistent with the Secretary of Interiors Standards.

The proposed 50–75-foot, approximately one-acre structure fundamentally departs from the adopted plaza



the

framework, alters the historic taxiway, obstructs protected view corridors, introduces prohibited vehicular circulation, and privatizes a substantial portion of Seaplane Plaza.

Project Conflicts. The Project exceeds the mandatory spatial configuration established in the Precise Plan and incorporated into AMC §30-4.24, conflicts with binding zoning standards, and conflicts with historic resource protections.

CEQA Streamlining Does Not Apply. CEQA streamlining under Guidelines §15183 applies only where a project is fully consistent with the governing General Plan, zoning code, and development framework analyzed in the prior EIR. This Project is not.

6. 2040 GENERAL PLAN CONFLICTS: GOVERNING OPEN SPACE & VIEW POLICIES

Conflicts with the General Plan. The proposed Project conflicts with every waterfront policy. The Alameda 2040 General Plan requires enhanced waterfront view corridors in all new development, use of the street grid to preserve water views, and limits on privatization that would obstruct those views.

The following General Plan Policies apply to the waterfront at Alameda Point.

- **“LU-6 Waterfront Mixed-Use.** Provide a wide variety of maritime, commercial, residential, civic, and recreational uses along the waterfront that compliment maritime activities, provide economic opportunities and jobs, and draw residents and visitors to the shore.”

Implementation of LU-6 requires the following **actions**:

- a. **Water Dependent Businesses.** Prioritize the current and future needs of public ferry systems, water taxis and shuttles, recreational and boating businesses, and other businesses and activities that require a waterfront location to operate.
- b. **Supporting Services.** Permit complementary maritime serving and visitor serving commercial services and uses to support the public waterfront access and maritime businesses on the waterfront.
- c. **Public Access and Bay Trail.** Ensure waterfront public access and Bay Trail improvements in all new waterfront development.”

The General Plan includes several other development requirements such as (Policy **LU-21**) to maximize waterfront accessibility and remain community-oriented, (Policy **OS-2**). protect public shoreline access from privatization. The General Plan also mandates preservation of the NAS Historic District and compatibility with its character (Policy **LU-17**).

Faulty CEQA Checklist. The Checklist’s General Plan consistency finding relies primarily on broad economic development and arts-support policies (LU-8, LU-9, LU-19) and VMT/climate

policies (ME- and CC-series), while omitting analysis of mandatory historic preservation, waterfront open space, scenic vista, and shoreline access policies. General Plan consistency must be evaluated against the Plan as a whole, not selectively against provisions that support a preferred outcome.

The Checklist does not address how the Project's 50–75-foot massing across the historic taxiway, obstruction of protected view corridors, and alteration of character-defining spatial relationships comply with controlling policies, including LU-6, LU-17, LU-21, OS-2, and enhanced waterfront view corridor protections.

Selective reliance on growth-promoting policies while ignoring binding waterfront and preservation mandates renders the General Plan consistency finding unsupported. Because §15183 streamlining applies only to projects fully consistent with the General Plan and zoning framework, its invocation here was improper.

7. CONCLUSION

The NAS Alameda Historic District is protected under federal, state, and local law, and the City has a binding duty to prevent degradation of the District's integrity. National Register status depends on preservation of its character-defining features, including contributing buildings, landscape features, spatial relationships, and waterfront openness.

The record demonstrates that the Project conflicts with governing federal instruments (including the Navy EDC conveyance and Secretary of the Interior's Standards), state law (including the Public Trust Exchange Act and CEQA), and controlling local land use regulations, including the Alameda Point Program EIR, the Waterfront and Town Center Precise Plan, the General Plan, and the AP-WTC zoning framework.

The Board is legally obligated to uphold these standards and the City's fiduciary duties under the Public Trust Doctrine. Those duties require protection of historic spatial organization, shoreline access, and designated view corridors, and do not permit approval of projects that materially conflict with adopted controls.

The Project alters character-defining spatial relationships, obstructs designated view corridors, displaces a mandated one-acre public plaza, and privatizes waterfront foreground required to remain publicly accessible and visually open.

A one-acre privately-owned commercial theater occupying the mandated plaza footprint, altering protected spatial relationships, obstructing designated vistas, and burdening the shoreline interface exceeds the City's lawful authority at this site.

Approval of projects that degrade the integrity of setting and feeling risks impairment of the District's National Register status and would undermine the environmental assumptions upon which prior EIR approvals were based.

Accordingly, a Certificate of Approval cannot lawfully issue, and the Project in its current form cannot be approved at this location. Relocation to non-contributing lands east of the Historic District would avoid these conflicts and preserve the integrity of the District and waterfront as required by law.

Sincerely,

Shelby Sheehan

NAS Historic District Preservationist

Encl. Attachment 1 - Evaluation of Noncompliance with Secretary of the Interior's Standards 1-10

Attachment 1: Evaluation of (2026-5733 PLN24-0145) Radium Theater Project's Noncompliance with Secretary of the Interior's Standards for Rehabilitation 1-10

The Radium Project proposes construction of a new performing arts theater within the NAS Alameda Historic District on the historic taxiway between the Seaplane Hangars and the Seaplane Lagoon. The proposed structure occupies approximately one acre of the open apron and includes a primary building mass with a vertical fly tower reaching approximately 75 feet in height.

The building spans a substantial portion of the historically open taxiway alignment and introduces enclosed interior program space, associated service areas, and vehicular circulation within an area historically characterized by expansive horizontal openness, orthogonal spatial organization, and uninterrupted waterfront vistas.



The Project Plan cover rendering itself shows the massive project overtopping the historic context and overtaking the open taxiway and waterfront views and dominating over the adjacent historic structures and character-defining features of the Historic district, making it clear this Project degrades the integrity of the historic character of the wide open views of the San Francisco skyline.

Accordingly, the project fails to meet the requirements for issuance of a Certificate of Approval.

The following analysis evaluates the Project under the Secretary of the Interior's Standards for Rehabilitation and the Guidelines for the Treatment of Cultural Landscapes, which govern both architectural compatibility and preservation of historic spatial organization, circulation patterns, and protected vistas within the NAS Alameda Historic District. The Project's compliance with each Standard is evaluated below.

NAS Alameda Historic District Preservation Guidelines and Requirements

The 2012 *Cultural Landscape Report* defines the character of the NAS Alameda Historic District through the following landscape categories (p. 192): spatial organization; views and vistas; topography; circulation; water features; vegetation; and structures, furnishings, and objects. The taxiway expanse — a broad, flat, unobstructed visual plane — is expressly identified as a character-defining landscape feature integral to the District's integrity.

Within the Hangars / Operations Area, the character-defining features directly implicated by this Project include:

1. Vast paved taxiways without obstructions (p. 242);
2. Flat topography forming an uninterrupted horizontal plane (pp. 248, 258);
3. The spatial quadrangle configuration defined by the “strong edges and dramatic vistas” created by hangar massing along and between the Seaplane Hangars (p. 233);
4. Dramatic vistas extending south to the Seaplane Lagoon and panoramic views east from Pan Am Way to and from the Hangars area, and west across the Airfield toward San Francisco (pp. 192, 233).

The orthogonal layout, massing relationships, and protected view corridors are reinforced through federal instruments and incorporated into local controls, including the Alameda Point Program EIR and AMC §30-4.24.

Alteration of the flat topography, open taxiway condition, protected vistas, or the subordinate relationship of new construction to the Hangars degrades the historic character of this Area.

Secretary of the Interior’s Standards for Rehabilitation

The governing preservation framework consists of the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* (36 C.F.R. Part 67), including the Standards for Rehabilitation, together with the *Standards and Guidelines for the Treatment of Cultural Landscapes*, which address spatial organization, circulation systems, and historic views.

Evaluation under these Standards requires application of the cultural landscape framework. The analysis must assess compatibility in size, scale, and massing, and ensure preservation of spatial organization, circulation, open conditions, view corridors, visual hierarchy, and period character.

The Consistency Report concludes that the Project “appears to comply” with all ten Secretary of the Interior’s Standards. The analysis, however, relies primarily on Standard 9 and focuses largely on façade treatment, fenestration, and architectural detailing. It characterizes the Project’s impact as limited to a partial obstruction of a single panoramic view.

The evaluation does not meaningfully apply the Standards to the District’s defining spatial and cultural landscape framework, including the expansive taxiway plane, orthogonal organization, framed view corridors between the Seaplane Hangars, and panoramic vistas toward the Seaplane Lagoon and San Francisco.

This independent evaluation concludes that the Project does not comply with the applicable Standards, as set forth below.

Evaluation Under the Secretary of the Interior’s Standards for Rehabilitation (Standards 1–10)

The NAS Alameda Historic District includes both contributing buildings and character-defining landscape features, including spatial organization, circulation systems, expansive taxiways, flat topography, orthogonal planning relationships, and panoramic waterfront vistas. Preservation review

within the District must evaluate impacts to both architectural features and the cultural landscape framework identified in the Cultural Landscape Report and subsequent guidance memoranda.

The proposed Radium Theater Project introduces a permanent, approximately one-acre structure within the historic taxiway plane between Pan Am Way and the Seaplane Lagoon, including a vertically dominant element reaching approximately 75 feet in height. The Project occupies a portion of the open apron identified as a character-defining feature and alters established view corridors, circulation patterns, and spatial relationships within the Hangars subarea.

VerPlanck Memorandum 2016

This evaluation is modeled on the 2016 VerPlanck Historical Consultants memorandum prepared for Block 11 and commissioned by the City. That memorandum analyzed development along the same historic taxiway corridor immediately west of Block 12 and included preservation criteria directly relevant to the Hangars/Operations Area and portions of Block 12 where the Radium Project is proposed.

The VerPlanck Memorandum identified preservation standards applicable to the open taxiway plane, axial alignments, and protected view corridors associated with the Seaplane Hangars and Building 77. It also clarified the relationship between compliance with the Secretary of the Interior's Standards and CEQA, explaining that projects complying with the Standards benefit from a regulatory presumption of less-than-significant impact, whereas projects that do not comply require further review to determine whether the resource would be materially impaired under CEQA Guidelines §15064.5(b).

Accordingly, an impartial evaluation of compliance with the Standards is essential to accurate CEQA determinations. The following analysis applies each of the Secretary's Standards to the Project, addressing both architectural and cultural landscape impacts. This evaluation concludes that the Project does not satisfy the applicable Standards, including Standards 1, 2, 3, 5, 9, and 10.

Standard 1 - New Use

Standard 1: *A property shall be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

Project Description: The Project proposes construction of a 1-acre performing arts theater and 1-acre entry plaza and associated with a new road, parking lot and trash area within the historic taxiway plane of the Hangars/Operations Area. The building footprint is approximately one acre and includes multi-level massing ranging from approximately 40 to 75 feet in height, spanning substantially the full north-south width of the taxiway.

Historic Context. The District is characterized by large-scale Seaplane Hangars that establish the primary vertical and massing hierarchy within the subarea. The taxiway is identified as a character-defining landscape feature, defined by its expansive horizontal plane, uninterrupted north-south

alignment, and axial orientation toward the Seaplane Lagoon. The open spatial condition is integral to the District's historic character.

Evaluation: Historically, this area functioned as open circulation space associated with aviation and waterfront operations. The proposed use is not maritime-dependent and is not functionally related to the historic aviation or shoreline uses that shaped the spatial organization of the Hangars subarea.

Standard 1 permits new uses only where they require minimal change to defining materials, features, spaces, and spatial relationships. Insertion of a permanent, multi-level enclosed structure occupying a substantial portion of the open taxiway plane materially alters the defining spatial relationships and circulation framework of the subarea. The scale and massing introduce a new dominant building form within an area historically defined by open apron space framed by the Hangars.

Insertion of a permanent, multi-level enclosed structure occupying a substantial portion of that open plane alters the defining spatial relationships and circulation framework of the Hangars subarea.

While contemporary use is not inherently incompatible with the historic preservation provisions, the scale and massing of the proposed structure introduce a new dominant building form within an area historically defined by open apron space framed by the Hangars.

Applicant's Evaluation: The applicant's analysis addresses the permissibility of a cultural use within the Historic District but does not evaluate whether implementation of that use requires minimal change to character-defining spatial systems. The analysis does not assess the extent of alteration to the taxiway plane, view corridors, circulation, or spatial hierarchy.

Finding: Standard 1 requires that the new use involve minimal change to defining features and spatial relationships. The proposed use necessitates substantial alteration of character-defining spatial relationships. **The Project does not comply with Standard 1.**

Standard 2 – Retention of Historic Character

Standard 2: *The historic character of a property shall be retained and preserved. Alteration of features, spaces, and spatial relationships that characterize the property shall be avoided.*

Project: An approximately one-acre, multi-level structure (40–75 feet in height), together with new vehicular access, parking, and service areas, on a second acre, and occupying a substantial portion of the historic taxiway plane and nearly the entire N-S span of the Taxiway

Historic Context: The Hangars/Operations Area is defined by expansive open pavement, aircraft- and pedestrian-oriented circulation, axial alignment of buildings with vistas and each other, and panoramic vistas. Character-defining views include the north–south alignment from West Tower Avenue between Hangars 40 and 41 toward the Seaplane Lagoon, as well as panoramic views in east–west sightlines along the taxiway corridor.

Evaluation: The Project introduces permanent vertical mass and automobile-oriented infrastructure within the open apron. From West Tower Avenue between Hangars 40 and 41, the structure occupies

the foreground of the axial view toward the Lagoon. From the east, the Project interrupts the westward panoramic vista across the Airfield. From the west, the building mass obstructs eastward views toward the Hangars and the interior of the District. The continuous horizontal plane of the taxiway is replaced with enclosed building mass, surface parking, and service functions.

Applicant's Evaluation: The Applicant's Compliance Analysis Report acknowledges that the Project alters the uninterrupted taxiway plane, orthogonal spatial framework, and panoramic view corridors. Pursuant to *CEQA Guidelines* 15064.S (b), that admission, the Applicant's Report admitted that character-defining features would be altered, which requires further analysis.

Finding: Standard 2 requires avoidance of alteration of character-defining features and spatial relationships. These changes permanently alter defining spatial relationships, view corridors, and circulation patterns that characterize the Hangars subarea. **The Project does not comply with Standard 2.**

Standard 3 – No False Sense of Historical Development

Standard 3: *A property shall be recognized as a physical record of its time, place, and use.*

Project: Permanent massive multi-level theater structure, roadway, parking, and service areas inserted within the historic taxiway plane across one acre of land, and a "plaza" entry way oriented toward the theater.

Historic Context: The Hangars subarea is defined by monumental hangars framing vast, open apron space within a clear orthogonal grid oriented to aircraft movement, the Landscape-Architecture integration of the orthogonal layout, preserved vistas, and dominance of the Hangars framing the vistas to and from the water are the major features of this subarea.

Evaluation: Insertion of a large enclosed structure with sizeable entryway and automobile-oriented infrastructure and a refuse area into the open taxiway alters the legibility of the historic aircraft-oriented development pattern and spatial hierarchy. The orthogonal alignment and open apron condition are materially modified.

Applicant's Evaluation: The Report evaluates differentiation of the new building façade but does not assess whether the Hangars subarea remains legible as a historic landscape defined by monumental hangars framing vast, unobstructed apron space.

Finding: Standard 3 requires that the property remain recognizable as a physical record of its time, place, and use, and prohibits changes that create a false sense of historical development. Insertion of permanent vertical construction within the historically open apron alters the spatial hierarchy that conveys the site's period of significance. **The Project does not comply with Standard 3.**

Standard 4 – Later Significant Changes. Not implicated by the Project.

Standard 5 – Preservation of Distinctive Features

Standard 5: *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*

Project: The Project proposes construction of an approximately one-acre, multi-level theater structure, ranging from approximately 40 to 75 feet in height, within the historic taxiway plane of the Hangars/Operations Area, together with associated roadway, parking, and service functions exterior to the building and a one acre entryway plaza .

Historic Context: The expansive, unobstructed taxiway plane and its role in structuring circulation, spatial hierarchy, and panoramic views are identified character-defining features. The Project occupies and interrupts this feature within the Hangars subarea.

Within the Hangars subarea, the open paved plane functions as and establishes the spatial hierarchy of the District, reinforces the orthogonal layout, preserves framed vistas between the Seaplane Hangars, and maintains panoramic views toward the Seaplane Lagoon and across the Airfield toward San Francisco. The dominance of the Hangars within this horizontal landscape is itself a defining characteristic.

Evaluation: Introduction of a permanent, vertically dominant structure and associated vehicular infrastructure into this open plane interrupts and removes a substantial portion of that character-defining feature within its specific subarea context. The alteration is not limited to surface treatment; it restructures the spatial organization and visual hierarchy of the Hangars area and directs pedestrian traffic into the building and forces those who want to enjoy the waterfront around it.

Applicant’s Evaluation: The report treats the taxiway primarily as a paved surface rather than as a character-defining spatial feature. The defining feature at issue is not pavement as a material, but the uninterrupted horizontal taxiway plane and its function within the District’s circulation system, orthogonal framework, and panoramic visual hierarchy. The presence of other paved expanses elsewhere within the District does not diminish the significance of this specific spatial plane within its subarea context. Removal or obstruction of a defining open plane contributes incrementally to the erosion of District integrity.

Finding: Standard 5 requires preservation of distinctive materials, features, and spatial relationships that characterize the property; it is not limited to retention of surface materials alone. The Project materially alters a character-defining spatial feature within the Hangars subarea. **The Project does not comply with Standard 3.**

Standards 6–8. Not implicated by the Project.

Standard 9 – Compatibility of New Construction

Standard 9: *New additions, exterior alterations, or related new construction shall not destroy historic materials, features, and spatial relationships that characterize the property.*

The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Project: The Project introduces a continuous building mass, including a 75-foot vertical element, into a historically horizontal and open landscape. The alteration affects circulation, spatial hierarchy, and multiple panoramic axes simultaneously.

Historic Context: The Hangars/Operations Area is defined by expansive, unobstructed taxiways framed by monumental Seaplane Hangars that establish the primary vertical hierarchy. The orthogonal layout preserves strong axial relationships, including north–south alignment toward the Seaplane Lagoon and east–west panoramic vistas across the Airfield. Hangar dominance within a broad horizontal plane is a defining characteristic of the District.

Evaluation: The uninterrupted taxiway plane, axial circulation, framed vistas, and skyline hierarchy function as an integrated landscape system. Insertion of a continuous building mass spanning substantially the north–south width of the taxiway interrupts that open plane, introduces a competing vertical element within the Hangars’ foreground, and restructures circulation through new roadway and parking infrastructure. The resulting massing is not subordinate to the historic hierarchy and alters multiple view corridors simultaneously.

Applicant’s Evaluation: The Report relies primarily on Standard 9 but narrows its analysis to a partial obstruction of a single view corridor. The Report narrows its Standard 9 analysis to a partial obstruction of a single view and does not evaluate compatibility in relation to the taxiway plane, orthogonal organization, circulation framework, skyline hierarchy, or integrated landscape system. Pursuant to *CEQA Guidelines* 15064.S (b), the admission that a “single view is partially obstructed”, the Applicant’s Report admitted that character-defining features would be altered, and requires further analysis under CEQA.

Finding: Standard 9 requires that new construction not destroy historic features or spatial relationships and that it be compatible in size, scale, proportion, and massing to protect the integrity of the property and its environment. The Project materially alters defining spatial systems and introduces massing incompatible with the historic hierarchy. **The Project does not comply with Standard 9.**

Standard 10 – Reversibility

Standard 10: *New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Project: The Project proposes construction of an approximately one-acre, multi-level theater structure, including a vertical element reaching approximately 75 feet in height, and a 1-acre plaza

rouging pedestrian traffic around or into it, together with associated roadway, parking, and service infrastructure within the historic taxiway plane of the Hangars/Operations Area.

Historic Context: The Hangars subarea is defined by expansive, unobstructed taxiway and apron space framed by the Seaplane Hangars, with strong axial relationships and panoramic waterfront vistas. The open horizontal plane and circulation framework are character-defining features that establish the District’s essential spatial form and visual integrity.

Evaluation: The scale and footprint of the proposed structure within the historic taxiway would permanently alter the spatial organization and landscape framework of the Hangars subarea. The essential open apron condition would not be restored without full demolition and reconstruction of the historic spatial plane and associated circulation systems. The introduction of roadway, parking, utilities, and foundation systems would further entrench the alteration of the landscape framework. Although removal of the building shell might eliminate the vertical mass, it would not automatically restore the original spatial integrity or circulation pattern.

Applicant’s Evaluation: The Report suggests that the Project is “reversible” in concept but does not analyze whether removal would leave the essential form and integrity of the District unimpaired. No evaluation is provided regarding the permanence of alterations to the taxiway plane, grading, infrastructure, or circulation framework.

Finding: Standard 10 requires that new additions be constructed so that removal did not impair the essential form and integrity of the historic property. The essential open apron condition would not be restored without full demolition and reconstruction of historic spatial systems. **The Project does not comply with Standard 10.**

Conclusion: The Project Fails to Comply with any of the 6 Applicable Standards

This evaluation is modelled after the City’s 2016 Verplanck Memorandum and applies the same governing preservation framework cited in the applicant’s report, including the Secretary of the Interior’s Standards and the cultural landscape analysis applicable to the Hangars/Operations Area. Using that shared baseline, this review reaches a different conclusion.

The applicant’s report expressly acknowledges alteration of character-defining spatial relationships within the historic taxiway plane. Under the Secretary’s Standards, identification of alteration requires a determination of non-compliance based on preservation principles. Instead, the report characterizes the alteration as limited and proceeds to conclude overall compliance without demonstrating that defining spatial systems remain intact.

As detailed above, the report’s treatment of Standards 1, 2, 3, 5, 9, and 10 does not fully evaluate the integrated landscape framework—including spatial organization, circulation systems, axial relationships, skyline hierarchy, and hangar dominance—that defines the District.

Where alteration of a historical resource is identified and compliance with the Secretary's Standards is not clearly established, CEQA Guidelines §15064.5 require further analysis to determine whether the resource would be materially impaired. A preservation consultant's role is to evaluate compliance with the Standards; it is not to resolve the CEQA impact determination where alteration is conceded.

The acknowledged alterations under Standards 2 and 9, coupled with the limited scope of analysis, renders the compliance conclusion unsupported. Where compliance is not demonstrated, the findings necessary to issue a Certificate of Approval cannot be made, and further environmental review is required.

This evaluation determines that the Project does not comply with the applicable Secretary of the Interior's Standards governing both architectural and cultural landscape preservation. The Consistency Report's focus on façade treatment does not substitute for required analysis of spatial organization, circulation systems, and protected view corridors that define the Historic District.

Accordingly, the findings necessary to issue a Certificate of Approval cannot be supported, and further CEQA review is required.

Memorandum

Date February 25, 2016

Project Alameda Point Block 11 and
Phase 1 of Waterfront Park

To Mr. Andrew Thomas
City of Alameda, Community
Development Department
2263 Santa Clara Avenue
Alameda, CA 94501

From Christopher VerPlanck
VerPlanck Historic Preservation
Consulting
57 Post Street, Suite 810
San Francisco, CA 94104

Topic Compliance with the Secretary of
the Interior's Standards and
Cultural Landscape Guidelines

Copied

Via Email

Dear Andrew,

I prepared this memorandum in response to your request for my professional opinion as to whether two proposed projects at Alameda Point comply with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards) and the Guidelines for the Treatment of Cultural Landscapes (Cultural Landscape Guidelines). As you know, the proposed projects would result in the construction of a new six-story, mixed-use (residential and commercial) building (Block 11), and the first phase of a new park on a portion of the seaplane taxiway (Waterfront Park). The requirement that the projects be reviewed for compliance with these standards and guidelines stems from the fact that both project sites extend into the southeastern corner of the locally and National Register-listed Naval Air Station (NAS) Alameda Historic District. It is our conclusion that the proposed projects comply with the Rehabilitation Standards and the Cultural Landscape Guidelines.

telephone: 415.391.7486

email: chris@verplanckconsulting.com

57 Post St., Suite 810, San Francisco, CA 94104

A. Credentials

Christopher VerPlanck, the author of this memorandum, has 18 years of experience researching and documenting historical properties in the San Francisco Bay Area and an equivalent amount of experience analyzing projects for compliance with the Secretary of the Interior's Standards. In addition, Mr. VerPlanck has a decade of experience working in Alameda. Indeed, Mr. VerPlanck authored Page & Turnbull's *NAS Alameda Historic District Assessment and Historic Preservation Strategy* in 2004. As an independent preservation consultant active since 2007, Mr. VerPlanck has consulted on several other projects in Alameda, including most recently the Del Monte Cannery and the William T. May Residence at 951 Pacific Avenue. Mr. VerPlanck meets the Secretary of the Interior's Professional Qualification Standards for both History and Architectural History.

B. Methodology

Christopher VerPlanck met with Mr. Andrew Thomas at Alameda Point to survey and photograph the two sites on February 9, 2016. VerPlanck then reviewed three background reports, including: *National Register Nomination for Naval Air Station Alameda*, *Cultural Landscape Report for Naval Air Station Alameda* – both by JRP Historical Consulting LLC – and Page & Turnbull's *NAS Alameda Historic District Assessment and Historic Preservation Strategy*. These three studies, which are all accessible online, provide extensively researched descriptions and histories of NAS Alameda. As a result, this memorandum includes only a brief summary description and history of NAS Alameda, concentrating on the site and on the analysis of the two projects for compliance with the Rehabilitation Standards and Cultural Landscape Guidelines.

The analysis in this memorandum follows the format outlined in Attachment A of the Mitigation Monitoring and Reporting Program (MMRP) prepared for Site A of the Alameda Point Project. Mitigation Measure 4.D-1a describes the procedures to be undertaken when projects are located within the boundaries of the NAS Alameda Historic District, including reviewing them for compliance with the following documents: *Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997), *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996), and *The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (1997).

C. Regulatory Environment

As mentioned previously, the two contiguous project sites overlap the eastern boundary of the NAS Alameda Historic District. The historic district, which was listed in 2013, encompasses the central portion of the former naval air station with a period of significance spanning the years 1938 to 1945. The core of the facility was designed by the U.S. Navy Bureau of Yards & Docks in the Streamline Moderne style, including the buildings in the Administrative Core, Residential Area, Shops Area, and Operations Area. The project site is part of the Operations Area, which consists primarily of hangars and support buildings. The National Register nomination found the district to be significant for its architecture, contributions to community planning and development, landscape architecture, and military history.

The two project sites are part of the Waterfront Town Center Specific Plan (Town Center Plan), an area plan approved by the Alameda City Council in July 2014. The Town Center Plan encompasses roughly 150 acres, including the area surrounding the Ralph Appezato Memorial Parkway entrance to Alameda Point, the seaplane taxiway and parking apron, three of the seaplane hangars, and Seaplane Lagoon. In June 2015, the Alameda City Council approved a development plan for “Site A,” a 68-acre section within the Town Center Plan area. Site A is a roughly rectangular area bounded by Main Street to the east, West Tower Avenue to the north, Pan Am Way to the west, and an unnamed future street roughly parallel to the existing east-west segment of Skyhawk Street. Site A also includes a “panhandle” section located on the taxiway, west of Pan Am Way and north of Seaplane Lagoon (**Figure 1**).

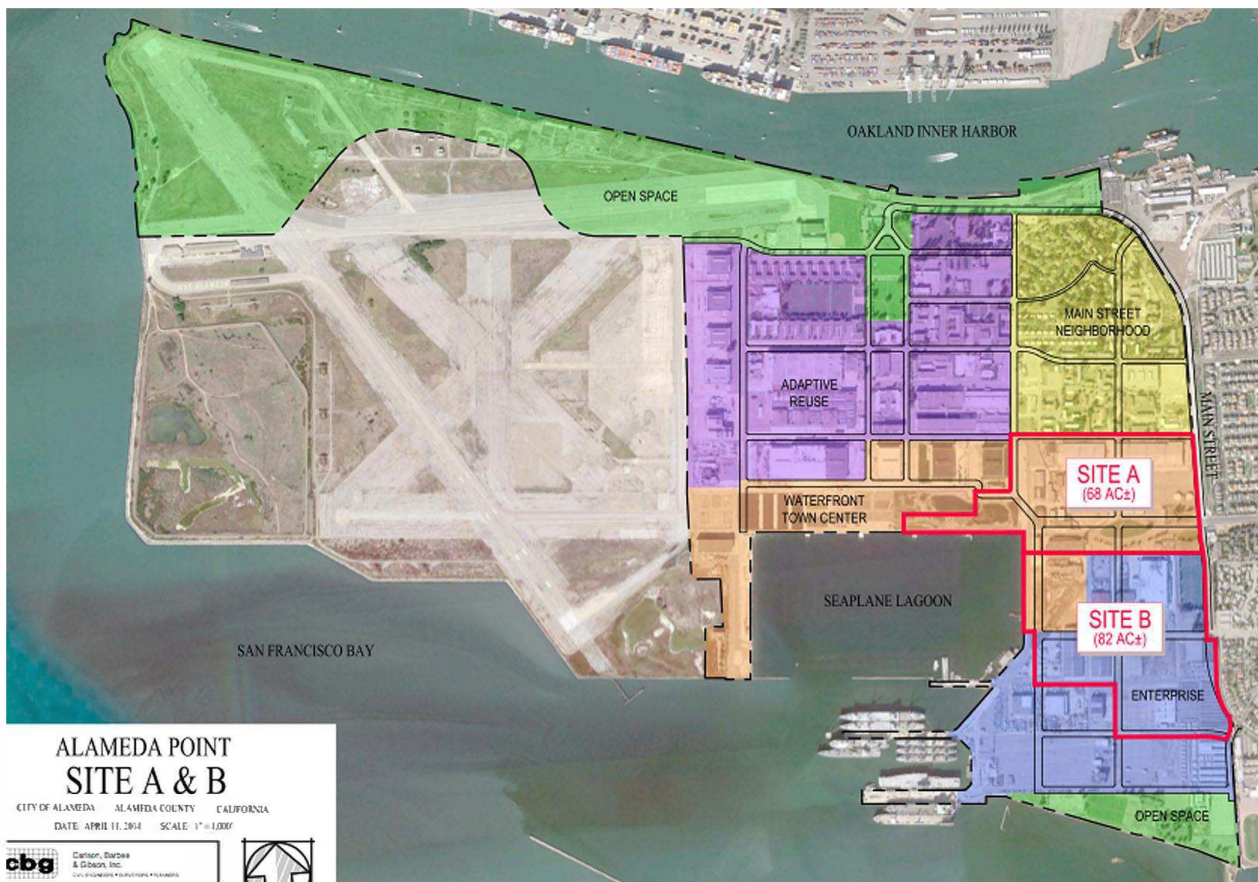


Figure 1. Map showing the location of the Waterfront Town Center and Site A
Source: Carlson, Barbee & Gibson Civil Engineering

The first elements of Site A to be developed will be Block 11 and Phase 1 of Waterfront Park (**Figure 2**). Block 11 will be built east of Pan Am Way, which will be extended south to the proposed Waterfront Park. It will be bounded to the south by Ralph Appezato Memorial Parkway (West Atlantic Avenue), which will be realigned to terminate at Seaplane Lagoon and the proposed Waterfront Park. To the north, Block 11 will be bounded by a new street that will terminate at Pan Am Way, between Buildings 41 and 77. To the east, Block 11 will be bounded by the relocated Ferry Point Street. Because both sites overlap the eastern boundary of the locally and nationally listed NAS Alameda Historic District, they must both receive a Certificate of Approval from the Historical Advisory Board (HAB).

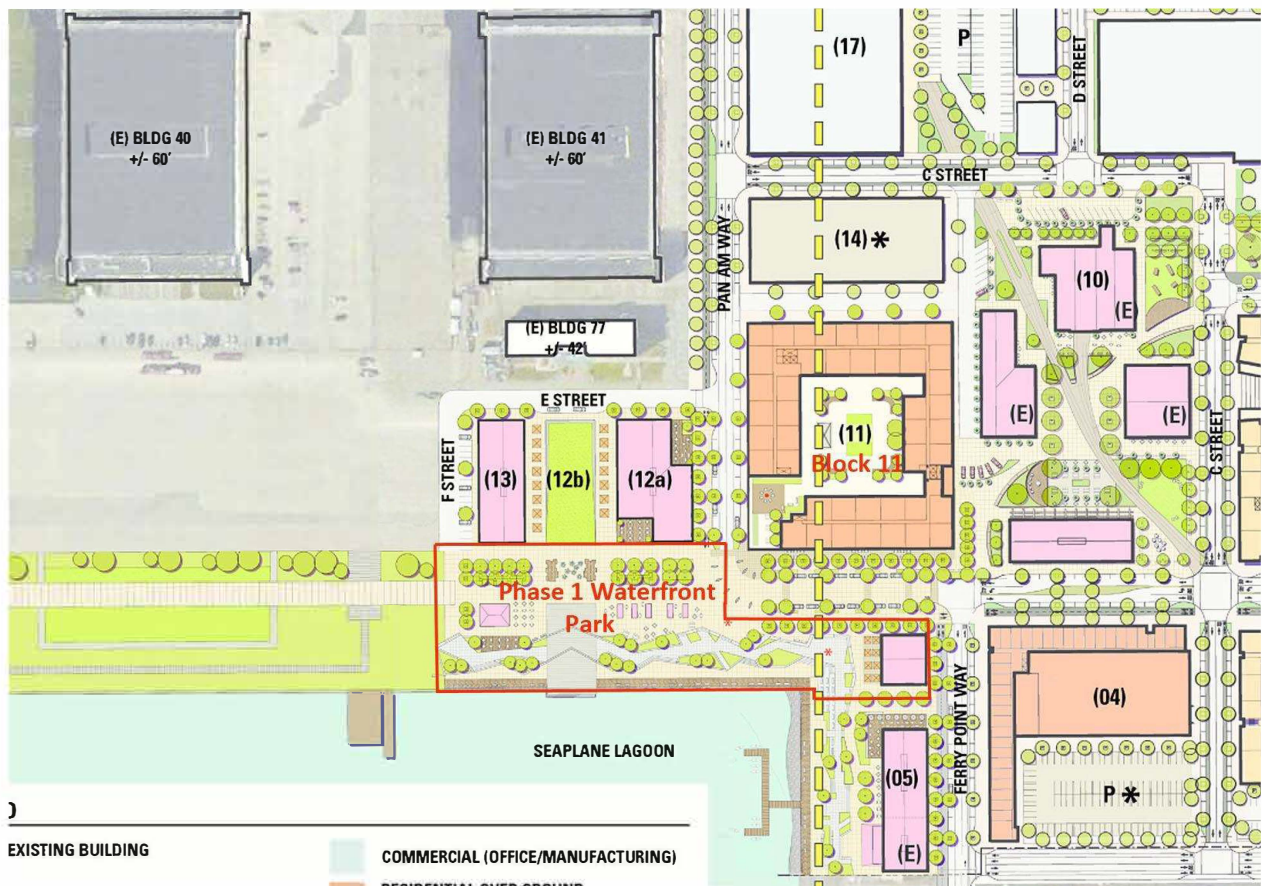


Figure 2. Site plan showing the location of Phase 1 of Waterfront Park (solid red line), Block 11, and the NAS Alameda Historic District boundary (dashed yellow line)

Note: this is a diagram; the design of Waterfront Park and Block 11 have changed

Source: City of Alameda Community Development Department

Site A of the Town Center Plan is the result of over two decades of planning activity that both preceded and followed the closure of NAS Alameda in 1997. Throughout the process it has been the intent of all parties and stakeholders, including the City of Alameda, the U.S. Navy, the California Office of Historic Preservation, and local residents to reach a consensus on what is most important about the former naval air station, including what areas need to be preserved and what areas are more receptive to change. The NAS Alameda Historic District encompasses the historic core of the former naval air station and omits areas that were developed during World War II itself and the Cold War – areas which do not maintain the Streamline Moderne architecture and “total base design” concept on display inside the historic district (**Figure 3**).

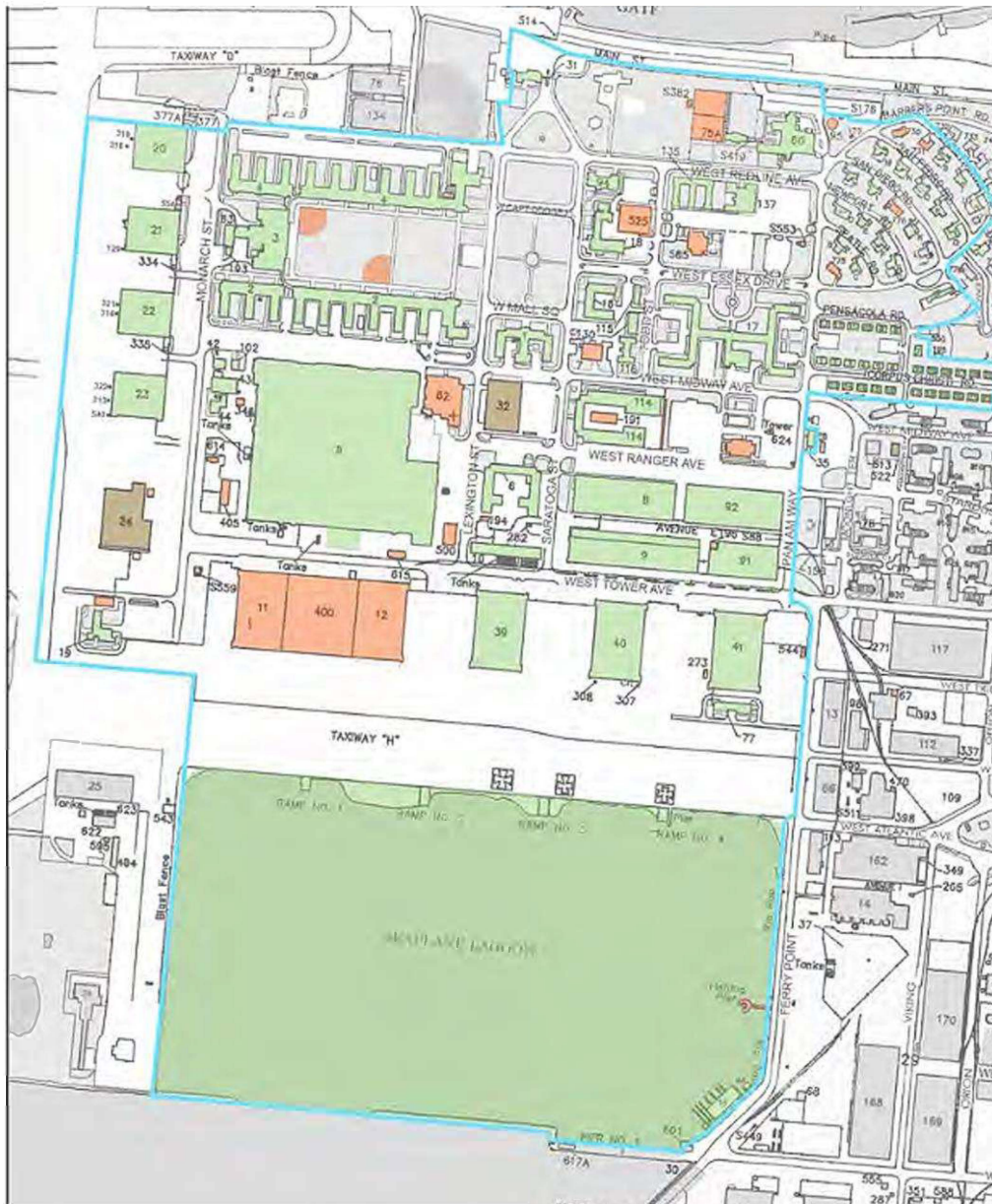


Figure 3. Boundaries of NAS Alameda Historic District
 Source: JRP Consulting

D. Site Description

The project sites are located at the southwest corner of Site A. The sites adjoin one another within an area bounded by Buildings 41 and 77 to the west, West Trident Avenue to the north, Orion and Viking streets to the east, and the east-west segment of Skyhawk Street to the south. The project site for Phase 1 of Waterfront Park extends along portions of the north and east sides of Seaplane Lagoon. Most of the project site is paved in concrete or asphalt and it also includes four utilitarian industrial buildings, including Buildings 13, 66, 113, and 544 (**Figures 4-7**). It also encompasses part of the concrete-paved seaplane taxiway and concrete bulkhead enclosing Seaplane Lagoon. A chain link fence presently separates the taxiway from Ferry Point Street. The following sections briefly describe the existing buildings on the site:



Figure 4. Project site, looking east from taxiway
Source: Christopher VerPlanck



Figure 5. Project site, looking north from parking lot east of Buildings 41 and 77
Source: Christopher VerPlanck



Figure 6. Project site, looking south from parking lot located east of Buildings 41 and 77
Source: Christopher VerPlanck

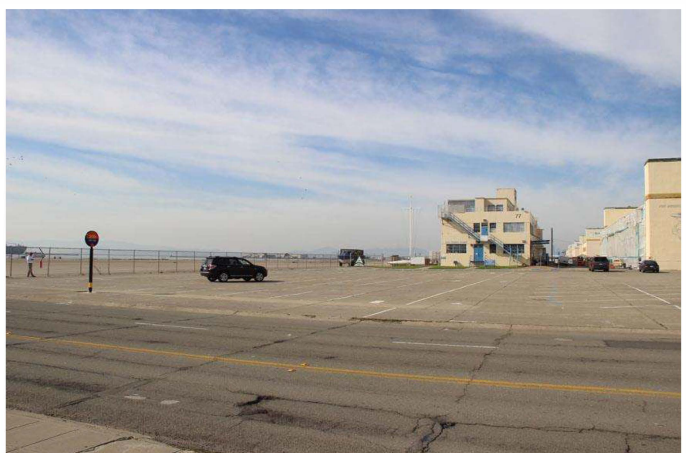


Figure 7. Project site, looking west from parking lot located east of Buildings 41 and 77
Source: Christopher VerPlanck

Building 113: Building 113 is located at the southeast corner of Ralph Appezato Memorial Parkway and Ferry Point Street. It is a one-story-and-mezzanine, steel-frame, corrugated metal-clad industrial building capped by a gable roof (**Figure 8**). The building has large metal “barn” doors on the short ends and a symmetrical fenestration pattern consisting of industrial sash metal windows on the long ends. The utilitarian building (erected 1943) was used for a variety of purposes over time, including warehousing and jet engine maintenance. The building was most recently occupied by a scrap metal dealer. Building 113 is not located within the boundaries of the NAS Alameda Historic District, but it will be retained and preserved as part of the project.



Figure 8. Building 113, looking southeast from intersection of Ralph Appezato Memorial Parkway and Ferry Point Street
Source: Christopher VerPlanck

Building 66: Building 66 is located at the northeast corner of Ralph Appezato Memorial Parkway and Ferry Point Street. It is a two-story, reinforced-concrete industrial building capped by a flat roof (**Figure 9**). The building’s utilitarian exterior is articulated by large areas of steel industrial glazing. Low, projecting shed-roofed wings on the long walls contain loading dock entrances outfitted with hinged metal doors. Built in 1943 as the Engine Accessory Test Shop, the building appears to be vacant. Building 66 is not located within the boundaries of the NAS Alameda Historic District and it will be demolished to make way for the new building at Block 11.

Building 13: Building 13 is located on the east side of Ferry Point Street and it occupies the majority of the block between West Trident Avenue and West Seaplane Lagoon Avenue. It is a one-story, reinforced-concrete and wood-frame industrial building capped by a flat roof (**Figure 10**). The building’s utilitarian exterior is articulated by an asymmetrical fenestration pattern consisting of steel industrial sash windows, metal pedestrian doors, and vehicular and freight entrances containing sliding and overhead metal doors. The northern half of the building is made of reinforced-concrete finished with a skim coat of stucco, and the southern half is of wood-frame construction and clad in wood channel

siding. The concrete section has a pair of loading docks on the long east and west façades. Built in 1942 as a paint and oil storage facility, Building 13 received the wood-frame addition at a later date. Building 13 is not located within the boundaries of the NAS Alameda Historic District and it will be demolished to make way for the new building at Block 11.



Figure 9. Building 66, looking northeast from intersection of Ralph Appezato Memorial Parkway and Ferry Point Street
Source: Christopher VerPlanck



Figure 10. Building 13, looking southeast from the intersection of West Trident Avenue and Ferry Point Street
Source: Christopher VerPlanck

Building 544: Building 544 is located on the west side of Ferry Point Street, just north of its intersection with West Trident Avenue. The building is a small, one-story metal-clad building capped by a gable roof (**Figure 11**). The exterior of the utilitarian building is punctuated by a symmetrical arrangement of window and door openings, all of which are boarded up behind plywood. Built in 1974 as a storage facility for liquid oxygen and nitrogen, the building is now vacant. Building 544 is located within the boundaries of the NAS Alameda Historic District but it is not a contributor. It will be demolished to make way for the new building at Block 11.



Figure 11. Building 544, looking northeast from the parking lot located east of Buildings 41 and 77
Source: Christopher VerPlanck

Seaplane Lagoon Seawall: As mentioned previously, the project site includes the taxiway running along the north side of Seaplane Lagoon, and as such, incorporates a portion of the Seaplane Lagoon seawall itself. The seawall is made of concrete supported atop concrete pilings that jut out into the lagoon at an angle (**Figure 12**). At regular intervals concrete ramps extend from the taxiway into Seaplane Lagoon, including one located just west of the proposed Waterfront Park. The seawall and adjoining taxiway are both in poor condition.

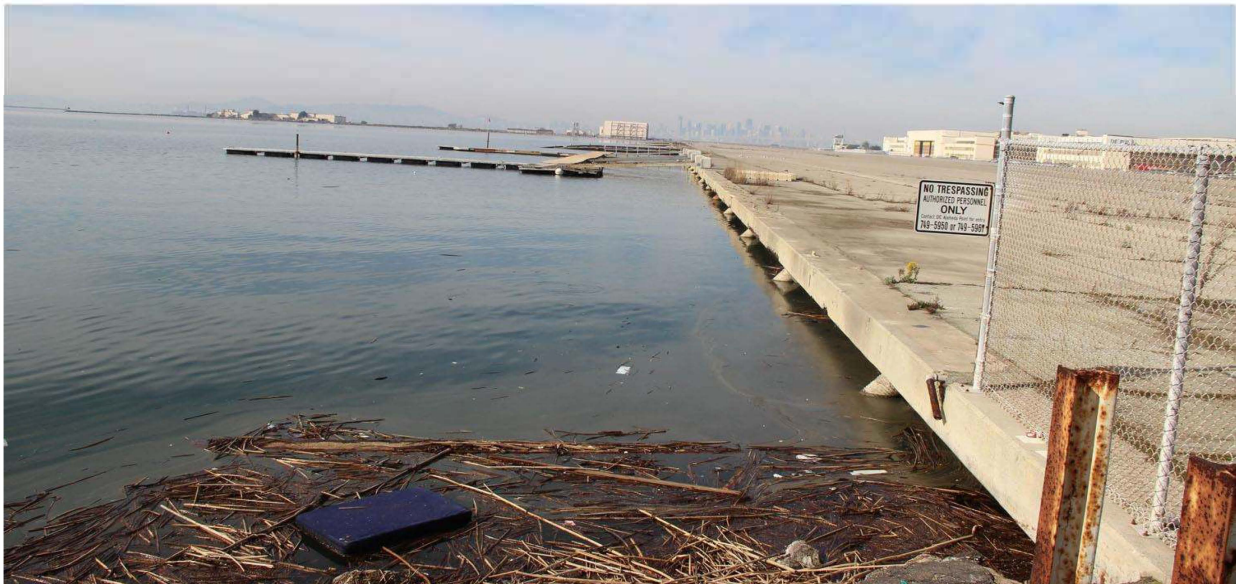


Figure 12. Seawall and Seaplane Lagoon, looking west
Source: Christopher VerPlanck

Building 41: There are two contributors to the NAS Alameda Historic District that are located within approximately 150 feet (about half a city block) of the two project sites: Buildings 41 and 77. Building 41 is bounded by West Tower Avenue to the north and Building 77 to the south (**Figures 13-14**). Built in 1945 as a seaplane hangar, the massive 118,041-sf building was later converted into a general-purpose aircraft maintenance facility. It is a one-story, steel-frame building enclosing a vast open area comprising several acres. Massive sliding metal doors provide access to the interior along the east and west façades. The north and south walls are concrete and enclose mezzanine-level offices inside the building.



Figure 13. Building 41, looking northwest from Ferry Point Street
Source: Christopher VerPlanck



Figure 14. Building 41 interior, looking northwest
Source: Christopher VerPlanck

Building 77: Located south of a narrow driveway separating it from Building 41 is Building 77, the Air Terminal Building. Originally built in 1942 as the Radio and Radar Building, the three-story, reinforced-concrete and wood-frame building was converted into the main terminal facility for NAS Alameda in 1958-60 (**Figures 15-16**). As part of this work the building was given a wood-frame, wood-clad, third-floor addition. The addition contain showers, lockers, and sleeping quarters for Navy personnel to use while on layovers between flights. The main entrance to the building is located on the south side, facing a pair of lawn panels located directly in front of the building. The entrance is recessed within a vestibule flanked by curved walls. The area above the entrance on the second and third floors is also recessed and bounded by curved walls. The building's fenestration consists of bands of tripartite steel industrial windows with operable hopper sashes. Most of the doors are also metal, though there are several non-historic wood-panel doors. Metal exterior stairs provide access from the ground to the roof. Building 77 incorporates a modest amount of Streamline Moderne ornament, including its curved entrance vestibule walls, recessed fenestration bands, and narrow concrete canopies. The building is now occupied by the Naval Air Museum.



Figure 15. Building 77, looking northwest from the parking lot located to the east of Buildings 41 and 77
Source: Christopher VerPlanck



Figure 16. Building 77, looking southwest from the parking lot located to the east of Buildings 41 and 77
Source: Christopher VerPlanck

E. Significance of NAS Alameda Historic District

As mentioned previously, NAS Alameda Historic District was listed in the National Register of Historic Places (National Register) in 2013. The National Register nomination, which was prepared by JRP Consulting, relies heavily on prior documentation dating back to the early 1990s. The nomination finds the roughly 406.5-acre historic district eligible under Criterion A (Events) and Criterion C (Design/Construction) with a period of significance spanning the years 1938 to 1945, beginning with the completion of the first building and ending with the conclusion of World War II. The historic district contains 100 contributing resources, including 99 contributing buildings and one contributing site – the historic designed landscape at the center of the district.

NAS Alameda is eligible under Criterion A as a naval air station constructed in the late 1930s as part of the Navy’s efforts to make naval aviation a centerpiece of its operations. NAS Alameda was one of six similar naval air stations built across the U.S. during the 1930s. The improvement of aircraft launching techniques and aircraft carriers themselves spurred on these efforts, as well as growing concerns over geopolitical changes in Europe and Asia. NAS Alameda was the first naval air station built in the San Francisco Bay Area, and it joined five other facilities across the country, including NAS Norfolk (Virginia), NAS San Diego, NAS Seattle, NAS Jacksonville, and NAS Quonset Point (Rhode Island). Built between 1939 and 1941, NAS Alameda played a critical role in supporting carrier-based warfare against Japanese forces in the Pacific Theater. It was home port to 23 ships, 22 air squadrons, and 1,500 aircraft. One of the best-known historical highlights at NAS Alameda was the launching of Lt. Col. James “Jimmy” Doolittle’s famous raid against Tokyo and three other cities in April 1942. Though damage to the enemy was minor, it provided a substantial morale boost to the country and was widely considered to be a strategic victory. During the war, the station’s primary mission was to maintain and repair aircraft – mainly carrier-based aircraft.

NAS Alameda Historic District is significant under Criterion C as a master-planned base designed by the U.S. Navy Bureau of Yards and Docks using an urban planning strategy called “total base design.” Under this system, the base was laid out to maximize efficiency and functionality, as well as aesthetics, through the use of modern design and landscape architecture. With its sophisticated Beaux-Arts plan, which made use of well-defined axial malls and different building types grouped into a hierarchical arrangement of discrete functional areas, NAS Alameda was designed to not only function efficiently but to be an attractive facility that expressed the Navy’s cultural traditions. The employment of extensive landscaping, public artwork, and contemporary architectural styling – in the case of NAS Alameda, the Streamline Moderne style – NAS Alameda was supposed to rise above military utilitarianism and become an attractive place to live, work, and socialize.

During World War II, the total base design concept at NAS Alameda was given up in favor of expediency and new buildings were either shoehorned into gaps within the original base or more commonly, constructed within the fast-growing area east of Pan Am Way. With very few exceptions, the buildings constructed during the Cold War period were entirely utilitarian. NAS Alameda expanded well beyond the original station during the Korean War and the Vietnam War, expanding eastward to Main Street and Central Avenue. The eastern part of the station, where the two project sites are located, is dominated by non-descript industrial buildings and apartment complexes dating to the 1940s, 1950s, 1960s, and 1970s. After the end of the Cold War, the so-called “Peace Dividend” resulted in many bases being identified for closure as part of the Base Realignment and Closure (BRAC) Act of 1990, including NAS Alameda, which closed in 1997.

F. Project Description

Block 11: Block 11 will be the first new building constructed within Site A of the Town Center Area. Preparatory work will include removing Buildings 66, 13, and 544, as well as all streets, sidewalks, and other infrastructure. Occupying a gross site area of 2.58 acres, the building will be a six-story (78’-high), mixed-use building containing 221 residential units on levels 1 and 3-6, 296 parking stalls on levels 1 and 2, and a little over 22,000 square feet of retail use. Other areas include residential lobbies, a leasing office, trash and utility rooms, circulation, and residential amenities, including 35,035 sf of common open space and 21,710 sf of private open space. The proposed building will have a “U”-shaped plan with two major six-story volumes embracing a central courtyard. Each wing will have a main entrance on axis with the courtyard, including one facing Pan Am Way and another on the east side. Retail and residential parking will be accessed by two garage entrances on the north side of the building. The building will be Type I-Midrise construction, consisting of four wood-framed stories above a two-story concrete podium. The exterior will be finished in several materials, including exposed concrete, stucco, metal panels, metal channels, and metal and vinyl-frame glazing. The styling is contemporary, with several references to the Streamline Moderne style prevalent in the adjoining NAS Alameda Historic District, including strong horizontal lines defining the building’s floor levels, the use of rounded forms to define the southwest corner of the building, 1940s-flavored fonts for building signage, gridded storefronts on the first floor level that recall the doors of the nearby seaplane hangars, the fenestration pattern on the upper floors, and exposed metal stairs and balconies.

In regard to its siting, Block 11 occupies an important spot at the heart of the Alameda Point Town Center area facing Seaplane Lagoon and San Francisco Bay. Located at the corner of the future relocated Pan Am Way and the future relocated Ralph Appezato Memorial Parkway, the building will occupy a prime location between the NAS Alameda Historic District and the rest of the Town Center area. The primary (south) façade of the building will face Ralph Appezato Memorial Parkway but this block will also function as a plaza that can be closed to traffic for special events. The plaza will be surfaced with decorative pavers and its edges defined by raised planters and bollards. Curbs will not be used; instead Ralph Appezato will be a “naked street” to encourage pedestrian activity and to remain compatible with the overall flat, open character of the adjoining historic district. The plaza and adjoining sidewalks will merge into the proposed Waterfront Park to the south.

Waterfront Park: Phase 1: As described above, the first phase of the Waterfront Park will encompass 2.63 acres of the taxiway along the north side of Seaplane Lagoon. It is part of a larger linear park that will eventually grow to 13 acres. A small portion will extend east of Seaplane Lagoon, where it will merge with the plaza in front of Block 11. The design of Waterfront Park is very simple and horizontally oriented, in keeping with existing conditions. It will consist of four separate zones: “The Promenade,” “The Terraces,” “The Taxiway,” and “The Overlook.” The first three areas are parallel to Seaplane Lagoon and rise in elevation from the lowest section (The Promenade) to the highest (The Taxiway), with The Terraces area in-between. The Overlook, which will include room for a small multi-purpose pavilion to be built in the future, will be located east of Seaplane Lagoon and opposite Block 11.

“The Promenade” will be exactly what it sounds like – a paved walkway along the north edge of Seaplane Lagoon. It will feature seating areas and plantings, with the area closest to the water paved in cobbles with metal bollards lining the seawall. “The Terraces” area is also self-descriptive, consisting of a series of wide, paved steps interleaved among low planted areas. Seating areas, low-profile palm trees (*Washingtonia Robusta*), and light standards will be located throughout The Terraces. The upper part of The Terraces area will be surfaced in decomposed granite and will contain picnic tables. These areas will flank a central patio where rotating public art displays will be featured. The furthest inland area is “The Taxiway,” a level paved area containing a multi-purpose lawn panel at the center flanked by two groves of low-growing trees, including possibly *Ginkgo Biloba* or *Platanus Acerifolia*, or “Yarwood.” A historical timeline of NAS Alameda will be incorporated into the paving materials of The Taxiway. East of Seaplane Lagoon, “The Overlook” will contain a deck made of salvaged wood. The deck will be used for informal gathering/sunset watching. At the east end of The Overlook will be a building pad for the future pavilion.

G. Analysis of Project-specific Impacts

In this section we analyze the two proposed projects for compliance with three sets of review standards and guidelines, including *The Secretary of the Interior’s Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (1997), *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996), and the *Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997).

Block 11: We will begin with Block 11, and because we are dealing with the construction of a new building within the NAS Alameda Historic District, we will use *The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (Rehabilitation Standards). The Rehabilitation Standards provide useful guidance for reviewing work to historic properties.¹ Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the Standards have been adopted by local government bodies across the country for reviewing proposed work to historic properties under local preservation ordinances. The Rehabilitation Standards are a useful analytical tool for understanding and describing the potential impacts of changes to historical resources, including new construction inside or adjoining historic districts.

Compliance with the Rehabilitation Standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under the California Environmental Quality Act (CEQA). Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historical resource.² Projects that do not comply with the Rehabilitation Standards may or may not cause a substantial adverse change in the significance of an historical resource and would require further analysis to determine whether the historical resource would be “materially impaired” by the project under *CEQA Guidelines* 15064.5(b).

Rehabilitation is the *only* one of the four treatments in the Standards (the others are Preservation, Restoration, and Reconstruction) that allows for the construction of an addition or other alteration to accommodate a change in use or program.³ The first step in analyzing a project’s compliance with the Rehabilitation Standards is to identify the resource’s character-defining features, including characteristics such as design, materials, detailing, and spatial relationships. Once the property’s character-defining features have been identified, it is essential to devise a project approach that protects and maintains these important materials and features, meaning that the work involves the “least degree of intervention” and that important features and materials are safeguarded throughout the duration of construction.⁴

The first step in ascertaining whether a project complies with the Rehabilitation Standards is to determine if the project would retain the bulk of the property’s “character-defining features.” In the case of Block 11, which would not result in the demolition of any historic district contributors, the only potential effect would relate to visual impacts to the historic district’s setting, in particular existing

¹ U.S. Department of Interior National Park Service Cultural Resources, Preservation Assistance Division, *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings*, 1992. The *Standards*, revised in 1992, were codified as 36 CFR Part 68.3 in the July 12, 1995 Federal Register (Vol. 60, No. 133). The revision replaces the 1978 and 1983 versions of 36 CFR 68 entitled *The Secretary of the Interior's Standards for Historic Preservation Projects*. The 36 CFR 68.3 *Standards* are applied to all grant-in-aid development projects assisted through the National Historic Preservation Fund. Another set of *Standards*, 36 CFR 67.7, focuses on “certified historic structures” as defined by the IRS Code of 1986. *The Standards* in 36 CFR 67.7 are used primarily when property owners are seeking certification for federal tax benefits. The two sets of *Standards* vary slightly, but the differences are primarily technical and non-substantive in nature. The *Guidelines*, however, are *not* codified in the Federal Register.

² CEQA Guidelines subsection 15064.5(b) (3).

³ *Ibid.*, 63.

⁴ *Ibid.*

sightlines of Buildings 41 and 77, and the row of all three seaplane hangars (Buildings 39, 40, and 41) from inside the historic district. The sections below present an evaluation of Block 11 for compliance with each of the 10 Rehabilitation Standards. Because Block 11 will have no physical impacts on any historic district contributors, several of the Standards will not apply, and this will be noted below. This evaluation is based on a set of architectural drawings and renderings prepared by BAR Architects and dated January 14, 2016.

Rehabilitation Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Construction of a residential building overlapping the eastern boundary of the NAS Alameda Historic District, an area traditionally used for industrial purposes, is not inherently harmful to the small portion of the historic district that it will occupy. Indeed, only the western third of Block 11 will overlap the eastern boundary of the historic district. Most of the area where Block 11 will be built is occupied by concrete and asphalt-paved surface parking lots and streets. Three non-historic industrial buildings, including one inside the historic district boundaries, will be demolished, but none are district contributors or have gained significance in their own right.

In conclusion, because residential uses are not incompatible with a military base and because the proposed new building barely overlaps the far southeastern corner of the NAS Alameda Historic District, the proposed project complies with Rehabilitation Standard 1.

Rehabilitation Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.

The proposed project will add a new, six-story building overlapping the eastern boundary of the NAS Alameda Historic District. The project will not result in the demolition of any district contributors or remove any other distinctive materials or features of the historic district. It will introduce a new feature which has the potential to alter existing spatial relationships outside of the historic district but visual impacts within the district will be limited, principally to the fact that a 78'-high building will be built within a half-block (about 150 feet) of the two nearest district contributors: Buildings 41 and 77. Though Block 11 will be a substantial building, Buildings 41 and 77 are also both large buildings, especially Building 41, which would be the closest district contributor to Block 11.

In conclusion, based on the proposed 150-foot setback, the existing large size of the nearest district contributors, and the location of the new building at the far southeast corner of the NAS Alameda Historic District – where it will not disrupt existing spatial relationships or view corridors inside the district – the proposed project complies with Rehabilitation Standard 2.

Rehabilitation Standard 3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.

Rehabilitation Standard 3 does not apply to the proposed project.

Rehabilitation Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

The only building within the boundaries of the NAS Alameda Historic District that would be demolished is Building 544. Constructed in 1974, the non-descript, metal-clad, modular building was erected nearly three decades after the end of the historic district's period of significance, and it is not architecturally significant. The other two buildings that would be demolished, Buildings 13 and 66, are not inside the boundaries of the historic district.

In conclusion, because it would not demolish or change elements of the property that have gained significance, the proposed project complies with Rehabilitation Standard 4.

Rehabilitation Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Rehabilitation Standard 5 does not apply to the proposed project.

Rehabilitation Standard 6: Deteriorated historic features will be repaired rather than replaced. When the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Rehabilitation Standard 6 does not apply to the proposed project.

Rehabilitation Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Rehabilitation Standard 7 does not apply to the proposed project.

Rehabilitation Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Analysis of the presence of potential archaeological resources on the project site, if any, is beyond the scope of this memorandum. However, if archeological resources are discovered, standard mitigation measures typically required by the City of Alameda would assure compliance with Rehabilitation Standard 8.

In conclusion, the proposed project complies with Rehabilitation Standard 8.

Rehabilitation Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property.

As described above, the construction of Block 11, though it would introduce a new element overlapping the eastern boundary of the NAS Alameda Historic District, would not destroy any historic materials, features, or spatial relationships that characterize the historic district. The proposed building is differentiated from nearby historic district contributors in terms of its materials and design, though the design remains compatible by referencing various features of the district, including scale, pronounced horizontal divisions between floor levels, curved corner elements, fenestration pattern, and signage. Nevertheless, Block 11 is clearly a contemporary building dating to the twenty-first century; it would not be confused for a building constructed at NAS Alameda between 1939 and 1941.

In conclusion, because it would not destroy historic materials, features, or spatial relationships; and because its design and materials would be compatible with the historic district, the proposed project complies with Rehabilitation Standard 9.

Rehabilitation Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Block 11 could be demolished and leave the NAS Alameda Historic District unharmed.

In conclusion, because it is reversible, the proposed project complies with Rehabilitation Standard 10.

Phase 1 of Waterfront Park: We will use two documents, including *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997) and *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996) to evaluate Phase 1 of Waterfront Park. However, because the first document is based on the latter document, and because it is tailored to use with the NAS Alameda Historic District, we have prioritized *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (Cultural Landscape Guidelines) to avoid unnecessary repetition.

Several of the studies completed on NAS Alameda since 1992 have concentrated on the station's historic designed landscapes. The most substantial of these, JRP Historical Consulting's *Cultural Landscape Report for Naval Air Station Alameda* (2012), focuses on how the flat topography of the site, as well as the need for efficiency and functionality, made it a good candidate for a strongly Beaux-Arts-influenced "campus" plan consisting of an orthogonal arrangement of buildings along axial landscaped malls that

intersect at the station's Administrative Core. NAS Alameda was initially designed without a planting plan, but the site's often heavy winds, combined with its location on filled marshland, made securing the silty soil imperative. Devised by landscape architect Emery A. LaVallee, the plan was executed on a relatively miniscule budget, making extensive use of trees, shrubs, and ground cover salvaged from the recently closed Golden Gate International Exposition (GGIE) at nearby Treasure Island. By 1942, one-fifth of the base was under cultivation, using an on-site nursery to grow the stock needed to augment what had been salvaged from the GGIE.

The landscaping program concentrated on the malls in the Administrative Core and the building sites in the adjoining Residential Area. The palette was simple and straightforward, consisting of grass turf and ice plant in the malls and the level areas around the administrative and residential buildings, street trees, and foundation plantings. As mentioned, most of the trees and shrubs were from the GGIE and included hardy Monterey pines, black acacia, and fan palms. Several ceremonial areas within the Administrative Core, including the entrance mall, were planted in fields of different-colored ice plant.

For the most part, the Shops Area and the Operations Area were not landscaped. Dedicated to aircraft assembly, maintenance, and storage, these areas were functional zones not visible to most visitors. That said, there were a few formally planted areas, particularly at the front of buildings adjoining the main north-south axis, including Buildings 6, 8, 62, and 114. Neither the landplane nor the seaplane hangars had any landscaping. Indeed, most of the Shops and Operations areas remain entirely paved with a combination of asphalt and concrete, including the taxiway and the parking apron south of Buildings 41 and 77. The only buildings in the Operations Area that had any landscaping were Buildings 20, 21, 22, and Building 77. Building 77, which is located north of the proposed Waterfront Park, has two separate lawn panels divided by a wide concrete walkway area in front of the main entrance. One of the lawn panels wraps around to the east side of the building. Concrete footpaths bisect the lawn panels to provide access to the main entrance on the south façade (See Figure 15).

Probably more important than the planting plan were the view corridors that aligned with the formally designed malls. During World War II, various aspects of the view corridors were compromised as new buildings were hastily constructed where open space had been. In addition, the area east of the original station – the area between Pan Am Way and Main Street – which was not laid out in the original master plan, was quickly and rather carelessly developed with residential quarters (north of West Tower Avenue) and support operations, including assembly, testing, and hazardous materials storage, south of West Tower Avenue.

Although there are no formally designed landscapes within the area comprising the two project sites, the construction of the first phase of Waterfront Park would introduce a new landscape feature to a part of the NAS Alameda Historic District that never had one. The evaluation standards below were taken from *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997). Within this document is a section that deals with the Operations Area, within which Waterfront Park would be built. This section identifies seven areas of importance that should be addressed when introducing new buildings or landscape features: Spatial Organization; Views/Vistas; Topography;

Vegetation; Circulation; Water Features; and Structures, Furnishings and Objects. These categories are taken from *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996), and in order to reduce repetitive commentary and analysis, this memorandum analyzes the project with the specific guidelines contained within the Cultural Landscape Guidelines tailored to NAS Alameda. The following sections analyze the proposed Waterfront Park under each of the seven areas of importance listed above. This evaluation is based on a set of drawings and renderings prepared by April Philips Design Works, dated January 14, 2016. Our response to each of the numbered points is presented in sequence under each of the bullet points below.

Spatial Organization:

1. Retain the orthogonal pattern established by the roads and building mass and volume.
 2. Retain and preserve the north-south bi-laterally symmetrical alignment (that extends from the Main Gate to Building 1) through Building 39 and the Seaplane Lagoon.
 3. Preserve and maintain the deep setback of low ground cover around Buildings 77, 20, 21, and 22.
 4. The design guidelines for new construction proposed in Section 6.2. General Management and Design Guidelines should address ways to ensure that new building siting, massing, parking areas, and landscape areas are designed in a manner that is compatible with the character-defining features of the historic designed landscape. The design guidelines should address ways to maintain, to the extent feasible, the open qualities of the character-defining spatial organization and views in the Operations Area.
- (1) Phase 1 of Waterfront Park is laid out in an orthogonal pattern in part guided by existing view corridors and circulation networks. It is laid out in a series of orthogonal strips that run parallel to Seaplane Lagoon and the taxiway. No curvilinear or overly “naturalistic” landscape features are introduced into the proposed park, privileging a more mechanistic aesthetic in keeping with the “total base design” concept originally employed in the earliest phase of development at NAS Alameda.
 - (2) Phase 1 of Waterfront Park will not interrupt any of the existing north-south or east-west view corridors or landscaped malls.
 - (3) Phase 1 of Waterfront Park will not physically impact or otherwise interfere with the existing lawn panels in front of Building 77, which lay outside the project site.
 - (4) Phase 1 of Waterfront Park is designed as a horizontally oriented, relatively level landscape feature that will be compatible with the level taxiway/parking slip area south of Buildings 41 and 77. Important view corridors, particularly the view from the relocated Ralph Appezato Memorial Parkway toward the seaplane hangars and downtown San Francisco in the distance, would be retained and enhanced by removing existing fencing and other intrusive obstacles and by directing the eye along these views through the orthogonal layout of the proposed park.

Views/Vistas:

1. Retain and preserve views:
 - a. Along Monarch Street and the west side of the Landplane Hangars
 - b. Along Tower Avenue and along the south side of the Seaplane Hangars
 - c. Southward to the Seaplane Lagoon and piers.
 - d. Westerly across Airfield
- (1) Because of where it will be located at the eastern boundary of the NAS Alameda Historic District, Phase 1 of Waterfront Park will not affect any of these view corridors. Conversely, it will open up a new view corridor with the realignment of Ralph Appezzato Memorial Parkway, which would align with the taxiway portion of the proposed Waterfront Park.

Topography:

The flat topography within the NAS Alameda historic district is a character-defining feature of the historic designed landscape. Minimize impact to the flat topography within the historic district. When improving drainage systems and/or implementing improvements to address flood risk and sea level rise, maintain, to the extent feasible, the appearance of the flat topography. Attempt to minimize the visual appearance of any modifications to the topography.

- Phase 1 of Waterfront Park would result in a slight grade change to comply with code-mandated requirements to account for sea level rise. This would be accomplished by gradually terracing up toward the center of the park from the seawall, an elevation change of about four feet. The individual terraces themselves will be low and wide so that the transition from the lowest point to the highest point of the park will be both subtle and gradual. Some low plantings will be added to the Terrace Area, and two groves of low-growing trees will be added to the upland part of the park. However, a gap will be preserved in The Taxiway area of the park to preserve the signature view corridor to the west.

Vegetation:

1. Protect and maintain the low ground cover on the south side and southeast corner of Building 77 and surrounding the Control Tower.
 2. Avoid adding foundation planting beds or trees at Building 77 within the open space area created by the setback.
 3. Protect and maintain the low ground cover east of landplane hangars Buildings 20, 21, and 22.
- (1-3) Phase 1 of Waterfront Park will not directly impact any of these areas.

Circulation:

The design guidelines for new construction proposed in Section 6.2. General Management and Design Guidelines should address ways to ensure that new building siting, massing, parking areas, and landscape areas are designed in a manner that is compatible with the character-defining circulation features of the large, open areas within the Operations Area.

- As discussed previously, the design of Phase 1 of Waterfront Park is very level and open with no permanent enclosed buildings or other high features that would disrupt the large, open vistas and view corridors in the area.

Water Features:

1. Retain and preserve the Seaplane Lagoon, including its bulkhead and ramps on the north edge, the rip-rap sides, and jetties on the south side.
2. New features constructed in the Seaplane Lagoon, such as pedestrian, visitor and boating facilities, docks, and/or piers should be designed to be compatible with character-defining features of the of the Seaplane Lagoon.

- (1) Phase 1 of Waterfront Park would not affect the shape or the design of Seaplane Lagoon. It is not clear from the drawings whether the project would preserve the entire existing concrete bulkhead, which is in poor condition, or replace it in kind. In addition, as mentioned previously, the bulkhead would have to be raised above its current level to comply with code-mandated requirements regarding sea level rise. On the other hand, the proposed project will retain and restore the existing seaplane ramps, though they would be modified to work with the raised/rebuilt seawall.
- (2) The Promenade area of Waterfront Park would be paved in gray cobbles, concrete pavers, and salvaged concrete to remain compatible with the texture and palette of the existing concrete paving of the taxiway. Phase 1 of Waterfront Park would add a public boat dock on the east side of Seaplane Lagoon. This feature would simply consist of a gangway that rises and falls with the tides and a wooden floating dock. The gangway would have simple metal cable railings.

Structures, Furnishings and Objects:

There are no structures, furnishings, and objects in the Operations Area that are character-defining features of the historic designed landscape, which is a contributing element of the NAS Alameda Historic District.

- Phase 1 of Waterfront Park proposes little in the way of permanent furnishings or other structures. Project drawings indicate that there will be wooden benches along The Promenade, raised planters in The Taxiway area, moveable seating in The Terraces area, and a wooden platform in The Overlook area. The plans also call for a concrete pad for the future construction of an open-air pavilion at the east end of the proposed park (outside the historic district). Clearly there is no precedent for features like this in the Operations Area of NAS Alameda, but a certain

amount of infrastructure is required to make the park functional. However, all of the proposed features are either low-profile, transparent, or otherwise unobtrusive to ensure that the taxiway area retains its character as a large, open area with few large obstructions. The only building proposed would be located outside the historic district boundaries.

CEQA Impacts Analysis:

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.”⁵ Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”⁶ The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register...as determined by a lead agency for purposes of CEQA.”⁷ Thus, a project may alter a structure that is considered a historical resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the alterations will not materially impair or undermine those physical characteristics the lead agency determines make the structure a historical resource to begin with.

As the analysis on the preceding pages demonstrates, Block 11 complies with all 10 Rehabilitation Standards and Phase 1 of Waterfront Park complies with the vast majority of the recommendations in *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District*. Furthermore, it is the author’s opinion that because Phase 1 of Waterfront Park complies with these guidelines that it also complies with the Rehabilitation Standards. As projects that comply with the Secretary of the Interior’s Standards, the projects appear to benefit from a regulatory presumption that they would have a less-than-significant adverse impact on the historical resource, which in this case is the NAS Alameda Historic District, and therefore not have an effect on the environment.⁸

⁵ CEQA Guidelines subsection 15064.5(b).

⁶ CEQA Guidelines subsection 15064.5(b) (1).

⁷ CEQA Guidelines subsection 15064.5(b) (2).

⁸ CEQA Guidelines subsection 15064.5(b) (3).

H. Conclusion

The proposed projects that are the subject of this study, Block 11 and Phase 1 of Waterfront Park, are the first elements of Site A of the Alameda Point Town Center area. Both projects overlap the eastern boundary of the National Register-listed NAS Alameda Historic District, with approximately one-third of Block 11 and over 50 percent of the proposed park being inside the historic district. Though Block 11 will be a substantial building, its design is compatible in regard to materials, design, massing, and fenestration pattern with the historic district contributors. The proposed new building would be about 150 feet distant (about half a city block) from the nearest district contributors (Buildings 41 and 77). Most important, it would not disrupt any important view corridors within the historic district. The proposed Phase 1 of Waterfront Park has been designed to retain the large, open character of the seaplane taxiway and enhance view corridors to the west along the row of seaplane hangars to the north. Under CEQA, a project that complies with all ten Rehabilitation Standards is considered to have a less-than-significant impact on the environment.⁹ It is my professional opinion that the proposed projects would not alter in an adverse manner those characteristics that justify NAS Alameda Historic District's eligibility for inclusion in the National Register and the City's Historic Preservation Inventory.

Please feel free to contact me if you have any questions.

Sincerely,



Christopher VerPlanck

⁹ CEQA Guidelines, Subsection 15064.5(b) (1).