

**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  
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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.

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## **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**

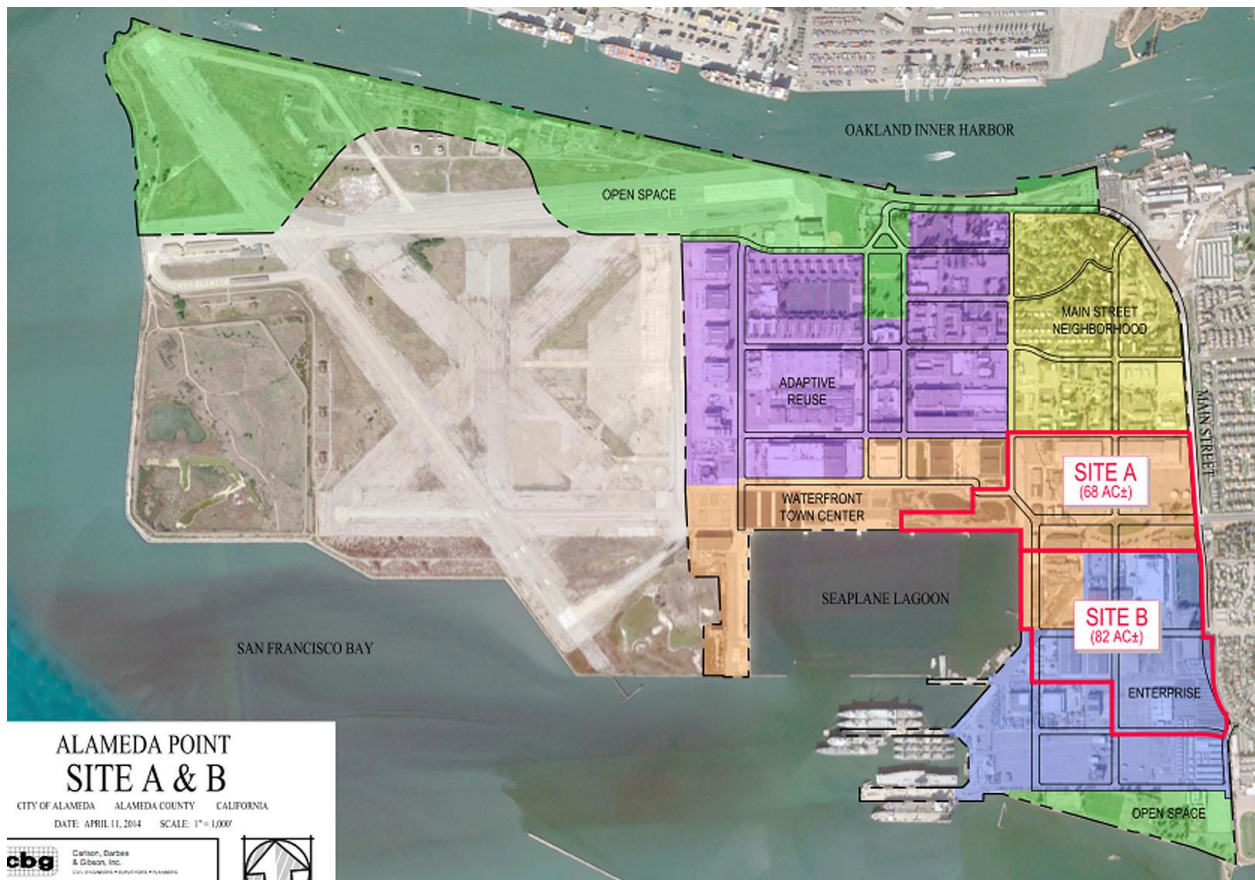
Christopher VerPlanck met with Mr. Andrew Thomas at Alameda Point to survey and photograph the two sites on February 9, 2016. VerPlanck then reviewed three background reports, including: *National Register Nomination for Naval Air Station Alameda*, *Cultural Landscape Report for Naval Air Station Alameda* – 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).

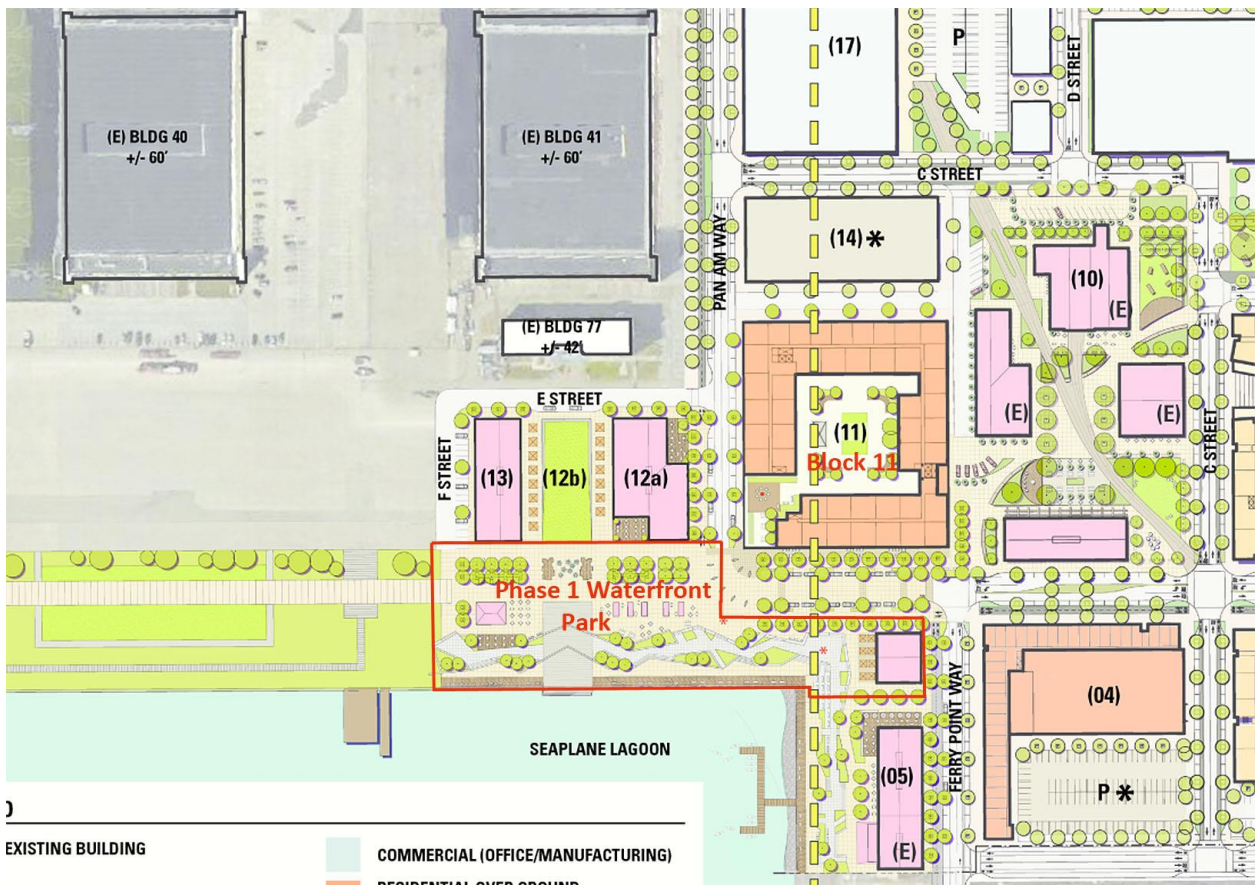


Figure 2. Site plan showing the location of Phase 1 of Waterfront Park (solid red line), Block 11, and the NAS Alameda Historic District boundary (dashed yellow line)

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.

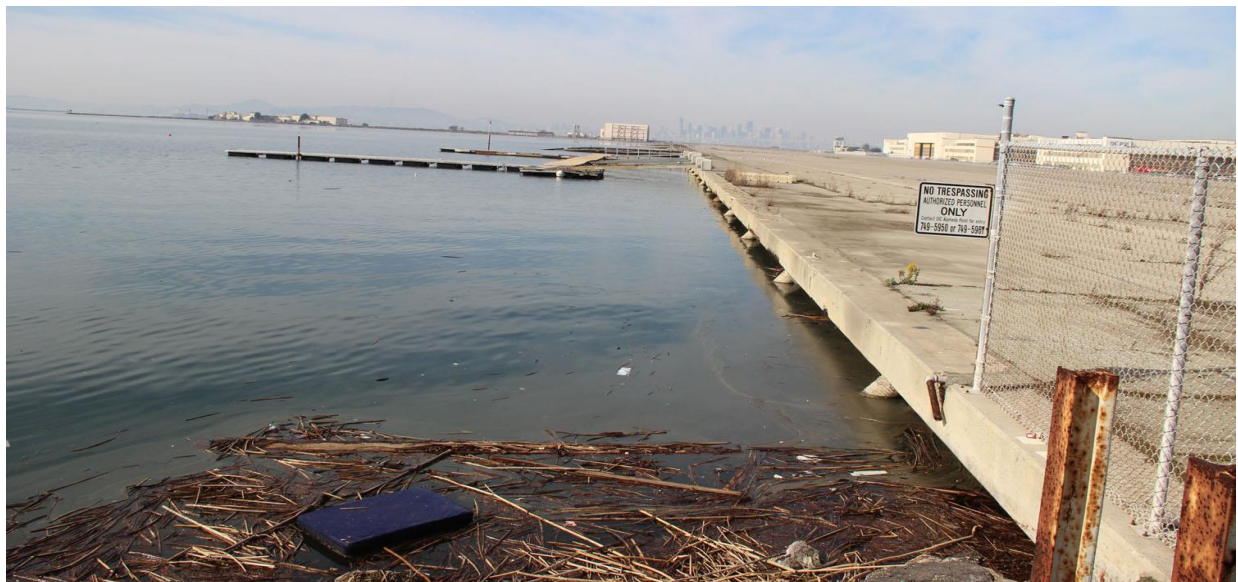


Figure 12. Seawall and Seaplane Lagoon, looking west  
Source: Christopher VerPlanck

**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.<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup>

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

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<sup>1</sup> 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.

<sup>2</sup> CEQA Guidelines subsection 15064.5(b) (3).

<sup>3</sup> *Ibid.*, 63.

<sup>4</sup> *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.”<sup>5</sup> 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.”<sup>6</sup> 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.”<sup>7</sup> 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.<sup>8</sup>

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<sup>5</sup> CEQA Guidelines subsection 15064.5(b).

<sup>6</sup> CEQA Guidelines subsection 15064.5(b) (1).

<sup>7</sup> CEQA Guidelines subsection 15064.5(b) (2).

<sup>8</sup> 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.<sup>9</sup> 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

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<sup>9</sup> CEQA Guidelines, Subsection 15064.5(b) (1).