

Exhibit 4 Item 4-A  
Historical Advisory Board Meeting  
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**Project:** Alameda Point Theater  
New Construction within the NAS Alameda Historic District  
Standards Compliance Analysis

**ARG Project #:** 240127

**Date:** January 22, 2025

**Via:** Email

### Introduction

Architectural Resources Group, Inc. (ARG) is pleased to provide the following Secretary of the Interior's Standards (Standards) Compliance Analysis for a proposed project including construction of a new performing arts theater within the Naval Air Station (NAS) Alameda Historic District, which is currently listed in the National Register of Historic Places (National Register) and qualifies as a historical resource for the purposes of the California Environmental Quality Act (CEQA).

### Methodology

This analysis addresses the current available design documents for the proposed project, entitled the Radium Theater Revised Development Plan, prepared by Bora Architecture & Interiors and dated November 21, 2024.

This analysis utilizes the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation is one of four treatment approaches defined by the National Park Service and refers to the "act or process of making possible a compatible use for a property

through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.”<sup>1</sup> This treatment is specifically recommended for the NAS Alameda Historic District in the 2012 Cultural Landscape Report for Naval Air Station Alameda prepared by JRP and PGAdesign, and was subsequently included in the City of Alameda Resolution No. 14771, which amended the City’s existing design review guidelines for the district’s historic designed landscape.<sup>2</sup> Furthermore, as the NAS Alameda is a designated Alameda historic monument, the City of Alameda is obligated to undertake this analysis via Alameda Municipal Code Section 13-21: Preservation of Historical and Cultural Resources, which states:

- a. AMC 13-21.5a, Permit Restrictions; Notification to Board of Request - No building, structure, group of structures, or site, including trees or plantings, that has been designated a Historical Monument shall be demolished, removed or altered without first referring the matter to the Historical Advisory Board for a certificate of approval.
- b. AMC 13-21.5b.1, Certificate of Approval, Alterations - The Historical Advisory Board shall determine whether to issue a certificate of approval for repairs and alterations of Historical Monuments, with or without conditions of approval, based on whether plans and specifications meet the standards established by the Historical Advisory Board and the Secretary of the Interior's standards for rehabilitation and guidelines for rehabilitating historic buildings.<sup>3</sup>

This memo provides independent, expert analysis to assist the Historical Advisory Board in making the necessary findings to issue a certificate of approval for the proposed project.

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<sup>1</sup> National Park Service, “Rehabilitation as a Treatment,” accessed October 24, 2024, <https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm>.

<sup>2</sup> City of Alameda, “City Of Alameda Resolution No. 14771 Amending The Alameda Historical Monument Designation Of The Naval Air Station Alameda Historic District Consistent With The United States Navy’s Nomination Of The Historic District To The National Register Of Historic Places And Amending The Guide To Preserving The Character Of The Naval Air Station Alameda Historic District To Include Design Review Guidelines For The Historic Designed Landscape,” adopted February 5, 2013.

<sup>3</sup> City of Alameda, “City of Alameda Historic Monuments List,” accessed December 20, 2024; City of Alameda, “City of Alameda California Municipal Code,” accessed December 20, 2024.

To prepare this analysis, ARG staff reviewed previous historic evaluations of record for NAS Alameda, including the Historic Architectural Resources Inventory for the Naval Air Station, Alameda, prepared by Sally B. Woodbridge in 1992; the Combined Specific Buildings Survey and Evaluation Report/Cold War Era Historic Resources Survey and Evaluation Report for Naval Air Station Alameda, prepared by JRP Historical Consulting in 2011; the Cultural Landscape Report for Naval Air Station Alameda, prepared by JRP Historical Consulting and PGAdesign in 2012; and the National Register of Historic Places Registration Form, Naval Air Station Alameda Historic District, prepared by JRP Historical Consulting in 2012.

ARG staff involved in preparing the Standards Analysis includes Deborah J. Cooper, FAIA, Principal, and Stacy Farr, Architectural Historian, Associate, both of whom meet the Secretary of the Interior's Professional Qualifications Standards in Historic Architecture and Architectural History, respectively.

### Executive Summary

This Standards Analysis finds that the proposed project complies with the Secretary of the Interior's Standards for Rehabilitation. The proposed project retains and protects the historic district's character-defining features and is designed in a manner that is differentiated from its historic surroundings but compatible with adjacent and surrounding historic features within the district. The effects of the proposed project on the historic character-defining features of the district are limited to a partial obstruction of one character-defining view, namely, panoramic views south from the Seaplane Hangars to the Seaplane Lagoon. However, as discussed within this report, the majority of this view will not be obstructed by the project.

Because the proposed project appears compliant with all ten of the Standards, the proposed project would not be considered to have a negative effect on the ability of the historic district to continue to convey its historic significance and its eligibility for continued listing in the National Register.

### NAS Alameda Historic District: Historic Significance

NAS Alameda has been subject to numerous past documentation and evaluation efforts. The U.S. Navy first identified a National Register-eligible historic district, referred to as the NAS Alameda Historic District, through consultation with the State Historic

Preservation Officer (SHPO) in 1992. This initial evaluation identified 1938-1945 as the historic period of significance, which corresponded to the district's significance under National Register Criteria A (Events) and C (Architecture/Design).<sup>6</sup>

Following the U.S. Navy's decision to transfer the installation out of federal ownership, further consultation with the SHPO and additional interested parties resulted in a series of more intensive investigations that provided additional information on the NAS Alameda Historic District's historical significance and contributing elements. These investigations culminated in the following three studies:

- *Combined Specific Buildings Survey and Evaluation Report/Cold War Era Historic Resources Survey and Evaluation Report for Naval Air Station Alameda* (prepared by JRP Historical Consulting, 2011): The purpose of this investigation was to update the previous evaluation of the NAS Alameda Historic District and to evaluate buildings within the district for potential individual National Register eligibility, relative to their World War II and Cold War contexts. The report affirmed the historic district's previously recognized areas and period of significance, and it identified 13 additional contributing buildings and structures to the historic district. Furthermore, it proposed expanding the district boundary south to encompass the entirety of the Seaplane Lagoon. The report concluded that no resources within the historic district appeared eligible individually for National Register listing.<sup>7</sup>
- *Cultural Landscape Report for Naval Air Station Alameda* (prepared by JRP Historical Consulting and PGAdesign, 2012): This cultural landscape report supplemented earlier evaluations of the NAS Alameda Historic District by closely examining and evaluating the district's historic designed landscape, which previously had not been investigated comprehensively. The report compiled an inventory of landscape elements in the various subareas of NAS Alameda, including spatial organization, views and vistas, topography, vegetation, circulation, water features, and furnishings and objects. It concluded that the historic designed landscape should be considered a contributor to the NAS

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<sup>6</sup> JRP Historical Consulting, *Combined Specific Buildings Survey and Evaluation Report/Cold War Era Historic Resources Survey and Evaluation Report for Naval Air Station Alameda*, prepared for Naval Facilities Engineering Command, Southwest, September 2011, 150-155.

<sup>7</sup> JRP, 2011, 18-19.

Alameda Historic District, and it identified character-defining landscape features of the district. The cultural landscape report did not propose changes to the district's period and areas of significance.<sup>8</sup>

- *National Register of Historic Places Registration Form, Naval Air Station Alameda Historic District* (reference number 12001191; prepared by JRP Historical Consulting, 2012): This documentation synthesized the information and evaluations contained in the two documents summarized above, for the purpose of formally listing the NAS Alameda Historic District in the National Register. It identified a 406.5 acre historic district with 100 contributing resources, including buildings, structures, and the designed landscape. The National Register documentation affirmed that the historic district was significant under Criteria A and C in the areas of architecture, community planning and development, landscape architecture, and military history. The historic district's period of significance was reiterated as 1938-1945. The NAS Alameda Historic District was officially listed in the National Register in January 2013.<sup>9</sup>

As a result of the National Register of 2012 Historic Places Registration Form, the NAS Alameda Historic District is listed on the National Register. The district's Criterion A significance reflects its strategic importance as a naval air station that contributed to the U.S. Navy's aviation missions and West Coast presence prior to and during World War II. The Criterion C significance recognizes the district as an exemplar of interwar-era naval installation planning principals, known as "total base" design, which incorporated distinctive Art Moderne architecture, symmetrical and hierarchical site layout, and carefully planned landscape design. The district's period of historic significance is 1938-1945, which encompasses its period of construction and its intensified operations during World War II.

### NAS Alameda Historic District: Character-Defining Features

As defined by the U. S. Department of the Interior National Park Service, character-defining features are those features of a historic resource that reflect the prominent

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<sup>8</sup> JRP Historical Consulting and PGAdesign, *Final Cultural Landscape Report for Naval Air Station Alameda*, prepared for Naval Facilities Engineering Command, Southwest, April 2012, 262-263.

<sup>9</sup> Christopher McMorris and Chandra Miller, "Naval Air Station Alameda Historic District," National Register of Historic Places Registration Form, Alameda County, California, JRP Historical Consulting, January 2013, Section 8.

and/or distinctive aspects, qualities, and characteristics of the historic resource, and that contribute significantly to its physical character.<sup>10</sup>

NAS Alameda Historic District includes 92 contributing buildings, seven contributing structures, and a contributing designed landscape, which comprises visual and spatial relationships, circulation patterns, areas of vegetation, and small-scale features throughout the district.<sup>11</sup>

The National Register nomination identifies some overarching character-defining features of NAS Alameda Historic District, which include:

- The use of “total base” design master planning, in which uses are organized into functional areas to create a modern, organized facility
- Adherence to Beaux Arts formality and City Beautiful planning principles, reflected in axial alignment and bilaterally symmetrical open spaces and spatial relationships
- Expression of military cultural traditions of hierarchy, uniformity, and order, most prominently reflected in the alignment of the landplane and seaplane operations, which are the primary operational components of the station, along the station’s primary axes, and in sightlines that connected important areas of the station
- Use of Moderne style architecture for most prominent buildings, which blended neoclassical proportion, symmetry, and order with modern design concepts of the time<sup>12</sup>

NAS Alameda’s total base design is reflected in its organization into four distinct functional areas, referred as the Administrative Core, Shops Area, Residential Area, and Operations Area. The National Register nomination uses these functional areas to identify the district’s specific character-defining features.

The proposed project site is located within the functional area known as the Operations Area. Buildings in the Operations Area that are adjacent to the proposed project site and

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<sup>10</sup> Lee H. Nelson, “Preservation Brief 17 - Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character,” U. S. Department of the Interior, National Park Service, Cultural Resources, Heritage Preservation Services, 1988.

<sup>11</sup> Fifty-eight buildings, structures, and landscape features within the boundary of the district have been identified as non-contributing.

<sup>12</sup> McMorris and Miller, “Naval Air Station Alameda Historic District,” Section 7 page 4-5.

contribute to the historic district include three Seaplane Hangars (also identified as Buildings 39, 40, and 41) and the Air Terminal Building (also identified as Building 77).

The Seaplane Hangars include the following character-defining features:

- Smooth concrete surface above a tall concrete bulkhead
- Prominent pylon-like door pockets, integrated into the building
- Rooftop monitors

The Air Terminal Building (Building 77) includes the following character-defining features:

- Smooth concrete surfaces
- Horizontal orientation
- Flat roofs
- Curving entry composition
- Wide ceremonial entry stairs

The Seaplane Lagoon is adjacent to the proposed project site and is also considered a contributing feature to the Operations Area. Character-defining features of the Seaplane Lagoon include:

- Footprint of open water
- Bulkhead along the northern edge of the Seaplane Lagoon
- Jetty forming the southern boundary of the Seaplane Lagoon
- Four concrete ramps along the lagoon's northern side

Within the general vicinity of the proposed project, character-defining features of the designed landscape site include:

- Paved open spaces between buildings, generally without sidewalks, curbs, or pedestrian paths
- Orthogonal layout of roads, buildings, and paths
- The location of the Seaplane Lagoon, which is bi-laterally symmetrical and aligned with the north-south axis of the Administrative Core
- Deep setback of the Air Terminal Building (Building 77), planted with lawn
- East-west views along West Tower Avenue
- East-west views along the row of Seaplane Hangars
- Panoramic views west across the Airfield from the Seaplane Hangars

- Panoramic views south across the Seaplane Lagoon from the Seaplane Hangars
- Flat topography
- Vast paved areas without curbs and few if any obstructions
- Spaces dominated by vehicular circulation, with few if any pedestrian sidewalks or paths

One character-defining feature of the historic designed landscape is identified within the Administrative Core but extends into the Operations Area and is relevant to the discussion of the proposed project.

- Paired, north-south views along Lexington and Saratoga streets, that extend through the Administrative Core and the Operations Area to the Seaplane Lagoon, formed by the axial layout of buildings and landscape features in the Administrative Core

These are the only two north-south view corridors identified in the National Register nomination as character-defining features within NAS Alameda Historic District. Municipal level planning efforts within the City of Alameda have identified several north-south view corridors in the vicinity of the project area, including two 80 ft wide view corridors located directly east of Building 40 and west of Building 41, and a 40 ft wide view corridor connecting the center line of the south elevation of Building 77 and the Seaplane Lagoon. However, these view corridors are not included as a character-defining feature of NAS Alameda in the National Register nomination and are therefore not under direct purview of this Standards Compliance Analysis.<sup>13</sup>

### Project Description

The following project description is based on the Radium Theater Revised Development Plan, prepared by Bora Architecture & Interiors on October 28, 2024. Information summarized here pertains only to the design of the proposed project and its potential to impact the historic character-defining features of the NAS Alameda Historic District; full project information is available from the project architects.

The Radium Theater will provide a new civic amenity for the City of Alameda. The project will be located on Blocks 12 and 13 at Alameda Point, on a portion of the former

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<sup>13</sup> Skidmore, Owings & Merrill, et. al., "Alameda Point Town Center and Waterfront Precise Plan," prepared for the City of Alameda, July 2014, 136.

taxiway between the seaplane hangars, Building 77, and the seaplane lagoon. The former taxiway has been identified as a development site by the City of Alameda's 2014 Alameda Point Town Center and Waterfront Precise Plan, and Blocks 12 and 13 are zoned for community serving non-residential uses. The proposed project has been developed in response to a request issued by the City of Alameda in 2023 for a permanent performing arts amenity at the site. New construction will include a three-story performing arts center, a one-acre landscaped outdoor plaza, and limited new roadways as needed to provide support and access to the site.

The Radium Theater building has a generally square footprint and is three stories in height with square massing. The square footprint is driven by the programmatic requirements of the main theater space, which has a traditional box form and will be located at the center of the building. The building is situated at the west portion of its development site; its primary (east) elevation will face a new landscaped outdoor plaza, and is aligned with the west edge of the municipally identified 40 ft view corridor connecting Building 77 and the Seaplane Lagoon. Locating the building at the westernmost portion of its development site respects this municipally identified view corridor and achieves additional project objectives by conveying the new theater building's design compatibility with Building 77, sheltering primary theater entrances from strong western winds, and creating space for a plaza that can serve as a point of arrival for both the new Radium Theater and Building 77.

The architectural design of the Radium Theater building draws inspiration from the scale and massing of the historic buildings at Alameda Point, and aims for compatibility with nearby historic buildings including the Seaplane Hangars and Building 77. At the primary (east) elevation, a slightly recessed, two-story glazed opening extends across most of the façade, referencing the fenestration and glazing pattern at the retracting Seaplane Hangar doors. The upper portion of the primary elevation includes a sculptural projecting canopy and symmetrical recessed roof volumes with curved corners, both features that reference the Art Moderne style architecture of Building 77 and other buildings in the historic district.

The building's side and rear (west) elevations include slightly recessed, two-story glazed openings of varying widths which also reference to varying degrees the fenestration and glazing pattern at the Seaplane Hangars and create a consistent character and level of quality across all facades. Wider openings at the east portions of side elevations allow

interior activities to be visible outside the building, provide daylight into the building, and provide exterior views from within the building. A proposed recessed outdoor terrace at the southwest portion of the building will create a connection between activities in the building and the adjacent waterfront park and the Seaplane Lagoon beyond. The rear (west) elevation includes narrower fenestration bays, corresponding with loading docks and additional service uses. At the roof, a proposed rooftop terrace at the southwest portion of the building will provide a perch for enjoying panoramic views to the San Francisco Bay and the San Francisco skyline beyond.

The new Radium Theater building will be clad in a monolithic material; the intent is to use precast concrete panels that incorporate a sculptural form with robust vertical striations inspired by the softly curving character of a theater curtain. This unique design will provide thematic reference to the building's interior activity, and will use a cladding material that is consistent with the character of the historic district in a distinct way that differentiates the new building from the surrounding historic structures.

At the roof, the fly tower is situated above the theater's stagehouse and is a necessary functional component of the building. The fly tower is 75 ft in height and set back from all four elevations. Proposed cladding material for the fly tower is ribbed stainless steel panels, which reference NAS Alameda's aeronautical history and will glisten as the sun moves across its surface, giving it a distinctive character that will visually differentiate this features from the solidity of the building's base.

The outdoor plaza includes a designed landscape that fills the majority of the development site between the primary (east) elevation of the new theater and Pan Am Way. The plaza is designed to support a variety of uses, from pathmaking arrival to the theater from multiple directions, to creating small and large pockets of outdoor space that can facilitate formal and informal outdoor gatherings. The plaza is bordered on all sides within a strong orthogonal framework created by Pan Am Way, the existing improvements at Waterfront Park, the broad façade of the new theater building, and the roadway improvements that will be located in front of Building 77. The plaza includes paved areas, stepped seating, and angled terraced planting beds in triangular and chevron formations. Paving in front of the primary (east) elevation of the new theater extends east approximately 20 ft to the east, allowing for unobstructed views of the new theater building's primary elevation and entrance, and respecting the municipally identified objective of a visual connection between Building 77 and the

Seaplane Lagoon. East of this 20 ft line, the plaza's angled terraced planting beds and stepped seating areas rise at low grade to a maximum height of approximately 11 ft within the eastern portion of the municipally-identified view corridor. Trees within the plaza include a mix of small to medium flowering trees, medium to large size canopy trees, and smaller understory trees. Soft landscape components serve to gather and retain storm water, and trees will be utilized to create shade.

Roadway improvements include a new access road between Building 77 and the new theater building and plaza, which will extend west from the existing roadway at Pan Am Way. This new roadway will be bi-directional and include parallel parking spots, street trees and other soft landscape components, and pedestrian drop-off areas for Building 77 and the new theater building. A second roadway improvement will extend south from the existing roadway at West Tower Avenue and provide truck and other service vehicle access to the west (rear) elevation of the new theater building. The route, width, and other details of this roadway are still under development in consultation with the City of Alameda.

### The Secretary of the Interior's Standards for Rehabilitation

The *Secretary of the Interior's Standards for Rehabilitation* (Standards) are a set of treatment standards for historic properties developed by the National Park Service. The Standards are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts, and are used at the federal, state, and often the local level to analyze what if any impact a proposed project may have on a historic resource. Use of the Standards for Rehabilitation is specifically recommended for the NAS Alameda Historic District in the 2012 Cultural Landscape Report for Naval Air Station Alameda prepared by JRP and PGAdesign, and was subsequently included by reference in City of Alameda Resolution No. 14771, which amended the City's existing design review guidelines for the district's historic designed landscape.

The Standards are as follows:

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.

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 a property will be avoided.
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 historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where 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.
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.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
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 will 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 and its environment.

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.

### Standards Compliance Analysis

The following analysis seeks to understand, using the Standards for Rehabilitation, what effect, if any, the proposed project may have on the character-defining features of the NAS Alameda Historic District. The character-defining features of the district are limited to those features enumerated in the 2012 National Register Registration Form and summarized in the NAS Alameda Historic District: Character-Defining Features section of this report.

Because the Standards were intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts, some Standards have limited applicability to the analysis of new construction in historic districts. Standard 9 is the only Standard that specifically addresses new construction: it is the primary evaluative tool used to analyze new construction in historic districts, and for this reason it is discussed first below. The remaining Standards are varyingly useful in analyzing new construction, and some include duplicative analytic language. Following a detailed evaluation of the proposed project using Standard 9, the remaining Standards are discussed below based on the general order of their applicability to the proposed project, rather than sequentially.

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 will 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 and its environment.

Discussion: Regarding destruction of historic materials, the proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will constitute all new, stand-alone construction, located at the concrete-paved open space of the taxiway/apron between the Seaplane Hangars (also identified as Buildings 39, 40, and 41), the Air Terminal Building (Building 77), and the Seaplane Lagoon. Construction of the proposed project will require the removal of some concrete paving, a material

that is ubiquitous throughout the historic district. The loss of this amount of existing concrete, when considered in the context of the broader, unaffected paved areas of the taxiway/apron, the Operations Area, and the 406.5-acre historic district as a whole, would not be considered a change that would destroy materials that characterize the historic district.

Regarding historic features, the character-defining historic features in the vicinity of new construction include the Seaplane Hangars, Building 77, and the Seaplane Lagoon. The proposed project includes all-new, stand-alone construction, and would not destroy these existing historic features.

Regarding spatial relationships, several character-defining features of the designed landscape are related to spatial relationships and are adjacent to the site of new construction, discussed individually below:

- Paved open spaces without obstructions - Similar to the discussion of the removal of paving, paved open spaces without obstructions can be found throughout the historic district; construction of the proposed project will remove some of the open space of the taxiway/apron, but, due to the retention of similar open spaces at the remainder of the taxiway/apron, the Operations Area, and the 406.5-acre historic district as a whole, this change would not be considered to destroy spatial relationships in the historic district.
- Orthogonal layout of roads and buildings - The proposed project does not impact the orthogonal layout of roads and buildings, as the new theater building and roadway improvements are all orthogonally arranged, and the new landscaped plaza, while including diagonal forms, is located within the strong orthogonal framework created by Pan Am Way, the existing improvements at Waterfront Park, the broad façade of the new theater building, and roadway improvements in front of Building 77.
- East-west views along West Tower Avenue and along the row of Seaplane Hangars - The proposed project does not affect east-west views along West Tower Avenue, and is set back from the Seaplane Hangars sufficiently that the east-west view along the hangars is likewise not affected.
- Panoramic views to the west from the Seaplane Hangars across the Airfield - The proposed project does not affect panoramic views west from the Seaplane Hangars across the Airfield, which is well west of the proposed project site.

- Panoramic views south from the Seaplane Hangars across the Seaplane Lagoon - The panoramic view to the south from the Seaplane Hangars across the Seaplane Lagoon will be partially affected by the proposed project, which will be located south of hangar buildings 40 and 41, between the hangars and the Seaplane Lagoon. However, panoramic views south from the Seaplane Hangars to the Seaplane Lagoon does not refer to one single fixed view, but rather describes a multitude of views, available from multiple viewpoints towards multiple viewpoints; while the proposed project will obstruct a portion of this view, the majority of this view will not be affected by the project.

Overall, the proposed project has a limited effect on historic spatial relationships related to views, and cannot be said to destroy historic spatial relationships within NAS Alameda Historic District.

The design of the proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, is differentiated from the existing features of the historic district but compatible with the historic materials, features, size, scale and proportion, and massing of the historic district. The new theater building has a contemporary design and is constructed of all new materials, which differentiate it from the existing features of the historic district in a way that can be visually comprehended by design professionals and the general public.

The design of the proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, is compatible with the design of surrounding features of the historic district. The new theater building introduces a new use in a large building, at a previously minimally developed area of the historic district: for this reason, the design of this building has been carefully considered for strong compatibility within the historic district. The height of the building, including the main volume and the fly tower, are driven by programmatic needs but are compatible with the height of the adjacent Seaplane Hangars. The generally rectangular massing of the new theater building is also compatible with the simple massing of Building 77 and the Seaplane Hangars. The symmetrical design of the new theater building's primary façade, which includes a slightly recessed, two-story multi-lite glazed opening extending across most of the façade and a sculptural projecting canopy and symmetrical recessed roof volumes with curved corners, reference the massive entry doors of the Seaplane Hangars and the Art Moderne style architecture of Building 77. Additional large multi-lite fenestration

openings at the sides of the building also reference the scale of fenestration throughout the historic district. Regarding materials, the new theater building will be clad in a monolithic material, with the intent to be precast concrete panels with robust vertical striations inspired by theater curtains. The use of a cladding material that is already present within the district provides a baseline of compatibility for this contemporary cladding interpretation. The use of stainless steel at the fly tower references the historic aeronautical activity within the district; however, this cladding material is not present elsewhere in the district, and would be considered more of a differentiation element of the new theater building.

The landscaped plaza likewise has a contemporary design and is constructed of all new materials, which differentiate it from the existing features of the historic district in a way that can be visually comprehended by design professionals and the general public. The landscape introduces a new use to the district, namely the facilitation of formal and informal outdoor gatherings, and as such, its contemporary aesthetic is appropriate for introducing a new use to a historic district as it is easily distinguished as new. New features in the plaza, such as diagonal forms, trees, and softscaping, are all anchored within a strong orthogonal framework created by Pan Am Way, the existing improvements at Waterfront Park, the broad façade of the new theater building, and roadway improvements in front of Building 77, increasing the compatibility of the new design within the historic district.

The design of roadway improvements are still under development in consultation with the City of Alameda. Roadway improvements will be paved and largely open spaces, will be orthogonally arranged, and will not appreciably impact any of the character-defining views within the historic district.

Overall, the design of the proposed project does not destroy historic materials, features, and spatial relationships that characterize the property, and is differentiated from yet compatible with the historic district in a way that protects the character-defining features of the historic district. For this reason, the proposed project appears to comply with Standard 9.

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 a property will be avoided.

Discussion: As introduced in the discussion of Standard 9, regarding the removal of distinctive materials, the proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will be located at the concrete-paved open space of the taxiway/apron between the Seaplane Hangars (also identified as Buildings 39, 40, and 41), the Air Terminal Building (Building 77), and the Seaplane Lagoon. While construction of the proposed project will require the removal of some concrete paving, this material that is ubiquitous throughout the historic district, and the removal of a relatively small portion of it would not be considered to change the historic character of the district.

Regarding the alteration of historic features, the character-defining historic features in the vicinity of new construction include the Seaplane Hangars, Building 77, and the Seaplane Lagoon. The proposed project includes all-new, stand-alone construction, and would not alter these existing historic features.

Regarding the alteration of spaces and spatial relationships, as introduced in the discussion of Standard 9, new construction in 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.

However, as detailed in the discussion of Standard 9, the proposed project is sited and designed in such a way that the character of the historic district will be retained and preserved. The effect of the loss of paving and the introduction of new construction into a formerly open area is lessened by the ubiquity of paving and other open spaces throughout the district. The project retains the orthogonal layout of the district, with new diagonal landscape components bound within a strong orthogonal arrangement of buildings and roads. And the majority of character-defining views are not affected at all by the proposed project, with the exception of the panoramic view to the south from the Seaplane Hangars across the Seaplane Lagoon. A portion of this view will be obscured by the proposed project; however, panoramic views south from the Seaplane

Hangars to the Seaplane Lagoon is not one single fixed view but refers instead to a multitude of views, available from multiple viewpoints towards multiple viewpoints; while the proposed project will obstruct a portion of this view, the majority of this view will not be affected by the project.

Overall, the proposed project includes limited removal of historic materials, no alterations to historic features, and limited changes to spaces and spatial relationships that characterize the historic district. Overall, the proposed project retains and preserves the character of the historic district. For these reasons, the proposed project appears to comply with Standard 2.

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.

Discussion: NAS Alameda Historic District is a decommissioned military air station and will not be used as it was historically. The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will introduce a new use into the historic district that has been approved at the municipal level as part of the NAS Alameda redevelopment planning process. This new use, which includes performing arts amenities and publicly accessible landscape improvements, requires minimal change to the district's distinctive materials, features, spaces and spatial relationships. As introduced in the discussion of Standards 9 and 2, construction of the proposed project will require minimal change to the paving and unobstructed space of the historic district; will not change the historic features of the district; and will introduce minimal changes to the spaces and spatial relationships of the district, namely in the obstruction of a portion of one of the character-defining panoramic views, south across the Seaplane Lagoon from the Seaplane Hangars. As previously discussed, this change is minimal because the panoramic views south across the Seaplane Lagoon from the Seaplane Hangars is not one single fixed view but refers instead to a multitude of views, available from multiple viewpoints towards multiple viewpoints; while the proposed project will obstruct a portion of this view, the majority of this view will not be affected by the project.

Overall, the proposed project introduces a new use into the historic district that requires minimal change to its distinctive materials, features, spaces and spatial relationships, and as such appears to comply with Standard 1.

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.

Discussion: The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will be constructed at a minimally developed site, characterized by concrete paving atop land that was reclaimed through the construction of the Seaplane Lagoon bulkhead wall. If the improvements included in the proposed project were removed in the future, the site could easily be returned to its historic condition through simple repaving.

For this reason, the proposed project appears to comply with Standard 10.

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

Discussion: As previously introduced in the discussion of multiple Standards, the proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will be constructed at a minimally developed site, characterized by concrete paving. The construction of the proposed project will require only the removal of some areas of concrete paving, and would not have any effect on any of the distinctive materials, features, finishes, and construction techniques that are present within the historic district.

For this reason, the proposed project appears to comply with Standard 5.

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

Discussion: The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will result in ground disturbance during the course of construction. Due to the character of the ground conditions in the area of the

proposed project, which includes concrete paving atop land that was reclaimed through the construction of the Seaplane Lagoon bulkhead wall, the likelihood that archaeological materials will be encountered during the course of construction is low. If archaeological materials are encountered, the project applicant will follow the City of Alameda's *Procedures for Inadvertent Discoveries of Archaeological Resources*.

For these reasons, the proposed project appears to comply with Standard 8.

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 historic properties, will not be undertaken.

Discussion: The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will constitute all new construction. While the design of the proposed project includes some references to the design styles of surrounding historic buildings within NAS Alameda, these design choices have been made to enhance the building's compatibility with its surroundings rather than to confuse the casual observer into thinking the new theater building is historic. The new theater building does not include any conjectural features or incorporate any elements from other historic properties.

For this reason, the proposed project appears to comply with Standard 3.

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

Discussion: NAS Alameda Historic District does not include any changes that took place after its 1938-1945 period of significance that have acquired historic significance; JRP Historical Consulting evaluated the district in 2011 for Cold War era significance and concluded that no resources within the historic district or the district as a whole appeared eligible for the National Register for association with this later period of development.

Because the historic district does not include any changes that have acquired historic significance in their own right, the proposed project does not have any impact on any such changes. For this reason, the proposed project appears to comply with Standard 4.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where 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.

Discussion: The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will constitute all new construction. The proposed project does not include repair or replacement of any historic features within the district. For this reason, the proposed project appears to comply with Standard 6.

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.

Discussion: The proposed project, inclusive of the new theater building, landscaped plaza, and roadway improvements, will constitute all new construction. No chemical or physical treatments that may impact historic materials are included in the proposed project. For this reason, the proposed project appears to comply with Standard 7.

### Findings

This Standards Analysis finds that the proposed project appears to comply with all ten of the Standards. The effects of the proposed project on the historic character-defining features of the district are limited to a partial obstruction of one character-defining view, namely, panoramic views south from the Seaplane Hangars to the Seaplane Lagoon. However, as discussed within this report, this view is available elsewhere along the Seaplane Hangars, from multiple viewpoints and towards multiple viewpoints, and the majority of this view will not be obstructed by the project. The proposed project retains and protects the historic district's character-defining features and is designed in a manner that is differentiated from its historic surroundings but compatible with adjacent and surrounding historic features within the district.

Because the proposed project appears compliant with all ten of the Standards, the proposed project would not be considered to have a negative effect on the ability of the

historic district to continue to convey its historic significance and its eligibility for continued listing in the National Register.

### Project Improvement Recommendations

While the proposed project as designed appear to comply with all ten of the Standards, ARG offers the following project improvement recommendations that may serve to enhance the proposed project's compatibility with adjacent and surrounding historic features of the district.

Recommendation 1: Revise the design of the new theater building to include a cladding material at the fly tower that is already present within the historic district. While ribbed stainless steel panels have been selected in reference to NAS Alameda's aeronautical history, using building materials that are already present in the historic district is a key component of compatibility of new construction. These historic cladding materials can be manipulated in new ways, as is planned for the concrete cladding of the main portion of the building, but introducing a new cladding material into a historic district is not recommended.

Recommendation 2: Refine the landscape design and planting plan within the new plaza to minimize the height of terracing and trees along the plaza's west perimeter. As designed, the landscape plan shows 11 ft terraces that extend west to a point approximately 20 ft from the primary (east) elevation of the new theater building, and the planting plan includes a mix of medium to large size canopy trees. Shifting these terraces east, or reducing their height in their current planned location, and relocating or eliminating large trees from the west perimeter of the new plaza will enhance the visibility of the primary (east) elevation of the new theater building, and enable that building's intentional design conversation with the primary (south) elevation of Building 77 to be seen and understood by the general public. This refinement will also carry the ancillary benefit of retaining the municipally identified 40 ft view corridor between Building 77 and the Seaplane Lagoon. As previously introduced, this view corridor is not a character-defining feature of the historic district as identified in the National Register nomination, but has been identified for preservation at the municipal level.

**Recommendation 3:** Revise the design of the window configuration on the rear (west) elevation of the new theater building. The rear elevation currently includes narrower fenestration bays, the width of which do not reflect the general pattern of fenestration arrangement within the historic district. Although this elevation includes loading docks and other service uses, it will be prominently visible from the remaining undeveloped portion of the taxiway/apron, and it is within the panoramic view south from the Seaplane Hangars to the Seaplane Lagoon, which is identified as a character-defining view within the historic district. For this reason, the fenestration proportion and arrangement at this elevation should be reconsidered for improved compatibility with the dominant fenestration pattern within the historic district.