

Memorandum

Date September 15, 2016

Project Building 8 Rehabilitation

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

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Via Email

Dear Andrew,

I prepared this memorandum in response to your request for my professional opinion regarding whether the proposed rehabilitation of Building 8 at Alameda Point would comply with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards) and the *Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (Cultural Landscape Guidelines). As you know, the proposed project would rehabilitate the existing three-story, reinforced-concrete warehouse constructed in 1940 as part of the Shops Area of Naval Air Station (NAS) Alameda for work-live and light industrial uses. The proposed project requires preservation review because Building 8 is a contributor to the locally and National Register-listed NAS Alameda Historic District. It is our conclusion that, as designed, the proposed project complies with all 10 Rehabilitation Standards and the Cultural Landscape Guidelines and that it would therefore not have a significant effect on the environment under the California Environmental Quality Act (CEQA).

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Exhibit 2
Item 7-A 10/24/16
Planning Board Meeting

A. Credentials

Christopher VerPlanck, the author of this memorandum, has 18 years of experience researching and documenting historic 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, Mr. VerPlanck has consulted on several other projects in Alameda, including most recently the rehabilitation of the Del Monte Cannery and the restoration of 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 visited Alameda Point on September 1, 2016 to photograph the exterior of Building 8, its site, and other buildings within its immediate vicinity. 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 project for compliance with the Rehabilitation Standards and Cultural Landscape Guidelines. Unless otherwise noted, all photographs in this memorandum were taken by Christopher VerPlanck on September 1, 2016.

C. Regulatory Environment

Building 8 is located in the Adaptive Reuse (AP-AR) zoning district. The building is a contributor to the National Register-listed NAS Alameda Historic District (Historic District). The Historic District, which was placed on the National Register in 2013, encompasses the oldest and most intact sections of the former military base. The period of significance spans the years 1938 to 1945. The U.S. Navy Bureau of Yards & Docks designed the majority of the buildings on the base in the Streamline Moderne style, including most of the buildings in the Administrative Core, the Residential Area, the Shops Area, and the Operations Area. Building 8 is part of the Shops Area, which consists of several general-purpose and ordnance warehouses, repair and outfitting shops, a power plant, and a firehouse. The National Register nomination found the Historic District to be significant for its architecture, community planning and development, landscape architecture, and military history. The NAS Alameda Historic District is also a City of Alameda Historical Monument. As a Historical Monument, any project that could affect the district is subject to review by the Alameda Historical Advisory Board (.

D. Project Site Description

The Project Site is located at the southeast corner of Saratoga Street and West Ranger Avenue, within the Shops Area. The Shops Area is bounded by West Midway Avenue to the north, Pan Am Way to the east, West Tower Avenue to the south, and Monarch Street to the west (**Figure 1**). The Shops Area is orthogonal in terms of its layout and utilitarian in regard to the design of most of its buildings. It has very little landscaping aside from several lawn panels along Saratoga and Lexington Streets. These small areas of landscaping symbolically continue the mall southward from the Administrative Core toward Seaplane Lagoon. The rest of the Shops Area is paved in asphalt and concrete.



Figure 1. Aerial photograph showing location of Shops Area.
 Source: City of Alameda Planning Division; annotated by Christopher VerPlanck

The majority of the Project Site is occupied by Building 8 (**Figure 2**). The northernmost part of the site is occupied by a parking area along the south side of West Ranger Avenue (**Figure 3**). The southern section of the site borders a paved alley between Buildings 8 and 9 (**Figure 4**). There is also a paved parking area enclosed within a chain link fence to the east of the building, between Buildings 8 and 92. There is some landscaping on the site, including three lawn panels to the west of the building along Saratoga Street (**Figure 5**). The lawn, which contains five mature black acacia trees, is the largest contiguous area of landscaping in the Shops Area. A pair of concrete-paved footpaths provide access across the lawn from Saratoga Street to the building’s main entrance. Building 8 once had foundation plantings but these were removed in 1979 when the Navy updated the original landscape. In addition to the black acacias, there are four small trees located in the foundation planting zone north of the main entrance. These

were planted in 1979 or are volunteer species that came up on their own, like a handful of young trees in the alley behind the building.

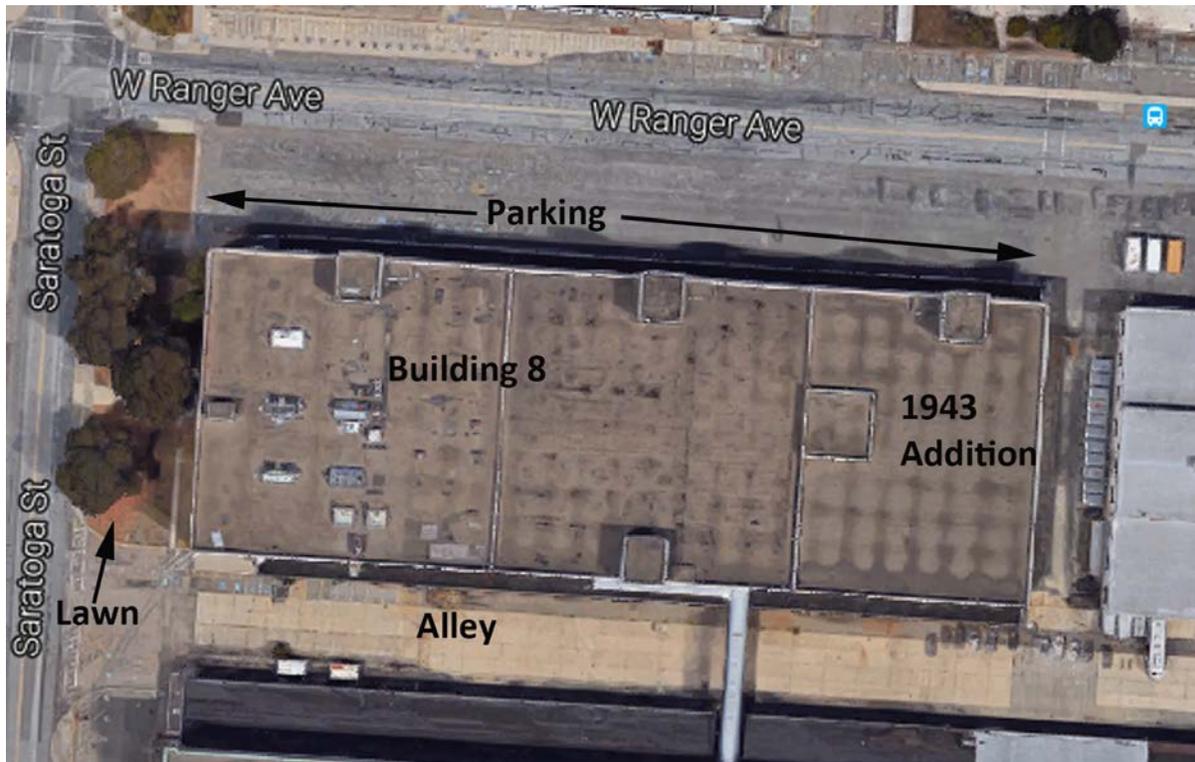


Figure 2. Aerial photograph of Building 8.
Source: Google Maps; annotated by Christopher VerPlanck



Figure 3. Parking strip behind lawn panel on Saratoga Street; view toward east.



Figure 4. Paved alley between Buildings 8 and 9; view toward east.



Figure 5. Lawn panels and black acacias in front of Building 8; view toward east.

Building 8 occupies the northwest corner of a rectangular “superblock” bounded by West Ranger Avenue to the north, Pan Am Way to the east, West Tower Avenue to the south, and Saratoga Street to the west. Other buildings on the block include Building 9, which is located south of Building 8 and is linked to it by a non-historic sky bridge. Built in 1941 as NAS Alameda’s Aircraft Storehouse, Building 9 is a two-story building with large hangar doors on its west façade (**Figure 6**). Though it is part of the Shops Area, Building 9 has more in common functionally and aesthetically with the adjoining Operations Area. Like Building 8, it is a contributor to the Historic District.



Figure 6. Building 9; view toward southeast.

To the east of Buildings 8 and 9, and occupying the eastern end of the superblock, are Buildings 91 and 92. They constitute a pair of large (53,223 and 89,019 sf, respectively) wood-frame, wood-clad warehouses constructed in 1942. Because they were constructed after the U.S. entry into World War II, they were built of wood, which unlike concrete and steel were not subject to any wartime building restrictions. Buildings 91 and 92 are both utilitarian structures clad in drop siding and they do not have any Streamline Moderne design elements like Buildings 8 or 9 do (**Figure 7**). Nonetheless, they are both contributors to the Historic District because they were constructed during the period of significance.



Figure 7. Building 92; view toward southeast.

Located across the street from Building 8, on the north side of West Ranger Avenue, are Building 114, the former Public Works Office/Maintenance Shop, and Building 191, Storage Racks. Similar to Buildings

91 and 92, Buildings 114 and 191 were constructed after the U.S. entry into the war (1944), and so they are utilitarian wood-frame building without any Streamline Moderne ornament (**Figure 8**). Also like Buildings 91 and 92, Buildings 114 and 191 are clad in drop siding. They both appear to be in poor condition. Building 114 has a landscaped lawn facing Saratoga Street, which serves as a continuation of the main north-south mall. Building 114 is a contributor to the Historic District but Building 191 is not.



Figure 8. Building 114; view toward northeast.

Building 6, the former Public Works Garage and Firehouse, is located to the west of Building 8, on the west side of Saratoga Street. It is a one-and partial two-story, reinforced concrete garage building with a flat roof and a U-shaped plan (**Figure 9**). Constructed in 1940, Building 6 was part of the original 1938 masterplan and it shares the same Streamline Moderne styling as Buildings 8 and 9. Building 6 has two separate lawn panels – one at the corner of West Ranger Avenue and Lexington Street and the other at the corner of West Ranger Avenue and Saratoga Street. It is a contributor to the Historic District.



Figure 9. Building 6; view toward southwest.

Building 8, the General Storehouse, is a three-story, reinforced-concrete warehouse with a rectangular footprint and a flat roof. It contains 270,000 square feet of space. The primary façade, which faces north toward West Ranger Avenue, is punctuated at semi-regular intervals by three four-story towers (**Figure 10**). The south façade, which is otherwise identical to the north façade, has only one tower (**Figure 11**). Each tower has an overhead loading door at its base and a vertical strip of fenestration at the second, third, and fourth floor levels (**Figure 12**). The cargo doors are recessed within rectangular openings with

curved sides. The fenestration pattern of the first floor level of the north and south façades is similar, with a mixture of freight doors interspersed among multi-lite, steel industrial windows. The doors open onto concrete loading docks sheltered beneath concrete canopies with curved supports (**Figure 13**). The loading docks are accessed by sloped ramps. The second and third floor levels of Building 8's exterior are articulated as horizontal bands of steel industrial windows alternating with simple, planar spandrels (**Figure 14**). The fenestration bands, which are painted a contrasting color to the rest of the building, are separated from the spandrels by incised lines and are slightly recessed.



Figure 10. North façade of Building 8; view toward southwest.



Figure 11. South façade of Building 8; view toward northeast.



Figure 12. Tower on north façade of Building 8; view toward south.



Figure 13. Loading dock on north façade of Building 8; view toward east.



Figure 14. Detail of west façade of Building 8; view toward southeast.

The Navy built the western two-thirds of Building 8 in 1940 as part of the original 1938 plan. In 1943, the Navy's Bureau of Yards and Docks constructed a major addition on the east side of the building, increasing its square footage by approximately one-third. The original east wall remains inside the building, where it has been modified to connect the two sections of the building. With the exception of the utilitarian east façade, the 1943 addition matches the original building in regard to materials, design, and detailing. The east façade of Building 8 is board-formed concrete without any Streamline Moderne detailing. It is articulated by six, multi-lite steel industrial windows (Figure 15).



Figure 15. East façade of Building 8; view toward south.

Building 8's primary entrance is located on the west façade, which faces Saratoga Street (Figure 16). It consists of a pair of single-panel metal doors inset within a rectangular opening with curved sides. The doors are capped by a large transom emblazoned with painted signage that reads:

SUPPLY DEPARTMENT
COMPTRROLLER DEPARTMENT
NARDAC SAN FRANCISCO
NICC ALAMEDA

The signage does not date to the World War II era, and it was most likely added when the Navy built offices in the building during the 1970s or 1980s. Still, it will likely be kept as part of the proposed project. The main entrance is sheltered beneath a cantilevered canopy and is accessed by a concrete stair flanked by large concrete cheek walls. Metal pipe railings serve as handrails.

Building 8 has been vacant for almost two decades and the exterior is showing many signs of neglect and vandalism, including many broken windows, some missing sashes, damaged doors, paint delamination, and biological growth. On the other hand, Building 8 is a concrete building whose shell appears to be in good condition.



Figure 16. Main entrance at 2350 Saratoga Street.

Major exterior alterations to Building 8 include the construction of an enclosed sky bridge between it and Building 9, a cantilevered addition next to the sky bridge, and the replacement of several original overhead doors with corrugated metal counterparts. According to the National Register nomination, parts of the interior have been reconfigured from warehouse use to office use, with temporary partitions constructed in various parts of the building. Most of these changes appear to date to the 1970s or early 1980s.

E. Significance of NAS Alameda Historic District

NAS Alameda Historic District was listed in the National Register of Historic Places 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. The Historic District contains 100 contributing resources, including 99 contributing buildings and one contributing site – the designed landscape.

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 more important part of its operations. NAS Alameda was one of six naval air stations built by the Navy during the 1930s. The improvement of aircraft launching techniques 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 northern California, 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). Initially built between 1939 and 1941, NAS Alameda played a critical role in supporting carrier-based warfare against Japanese forces in the Pacific Theater during World War II. It was homeport to 23 ships, 22 air squadrons, and 1,500 aircraft. One of the best-known highlights in the history of NAS Alameda was the launching of Lt. Col. James "Jimmy" Doolittle's famous raid against Tokyo and three other Japanese cities in April 1942. Though damage to the enemy was minor, it provided a substantial morale boost to the United States and was widely considered 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 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 made NAS Alameda rise above conventional 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. The Navy, increasingly concerned with expediency, shoehorned new buildings into gaps between existing buildings, sometimes

on areas reserved for landscaping, or in the fast-growing area east of Pan Am Way. This lack of concern for aesthetics continued after the war, and with very few exceptions, the buildings constructed during the Cold War period were utilitarian in terms of their design and constructed of wood instead of concrete or steel. NAS Alameda expanded well beyond the original station's masterplan area during the Korean and Vietnam Wars, eventually reaching the eastern boundary of the base at Main Street and Central Avenue. Development at NAS Alameda came to an end in the late 1980s, when it reached build-out. The so-called "Peace Dividend" that followed the end of the Cold War led to the closure of many bases under the terms of the Base Realignment and Closure (BRAC) Act of 1990, including NAS Alameda, which closed in 1997.

F. Project Description

The proposed project entails the adaptive reuse of Building 8 for light industrial and residential uses, collectively described as "creative entrepreneurship" or work-live "maker space." The building would accommodate up to 88 work-live units, a café and/or a restaurant, and possibly a bar or tavern. The scope of work entails the demolition of all interior partitions (none of which are historic), the rehabilitation and repair of the building's historic core and shell, replacement of most existing utilities and infrastructure, the construction of ADA-mandated accessibility improvements, various interior and exterior alterations/improvements to facilitate the building's intended new uses, and an approximately 4,000-sf vertical addition. The developer is Jonah Hendrickson, of Alameda Point Redevelopers, LLC. The project architects are Marcy Wong Donn & Logan Architects and Mikiten Architecture, both based in Berkeley. For this memorandum, we reviewed preliminary drawings dated August 31, 2016.

On the exterior of Building 8, the proposed project calls for the removal of all post-1943 doors, windows, and additions, including the sky bridge and the addition on the south wall of Building 8. The interior would be reconfigured and reconstructed, including five new elevator/stair lobbies on each floor level, new recycling rooms on each floor, up to 88 work/live units on the second and third floor levels (approximately 44 per floor), and an enclosed common room in the new roof-top addition. The common room would provide access to a proposed outdoor garden/roof deck that would cover a portion of the roof. Existing skylights on the roof would be augmented by four new skylights. One of the skylights would be pyramidal in shape and would rise 15' above the roof toward the east end of the building. The new vertical addition would be 3,997-sf and would rise 21' above the roof. It would be set back 40 feet from the north and south façades and approximately 140 feet back from the east façade. Set back about 20 feet from the east wall will be a 6-foot-high wind wall to break on-shore winds blowing in from San Francisco Bay.

The four exterior façades of Building 8 would undergo some changes as part of the proposed project. In addition to removing non-historic additions, doors, and windows, the project would add 14 new aluminum storefronts (seven each on the north and south façades) within existing door openings that presently contain non-historic roll-up doors. In addition, nine (five on the north façade and four on the south façade) existing steel industrial window units on the first floor level would be modified so that the left window panel will be replaced with an aluminum door. Other exterior changes include the addition of one window on the tower on the south façade, the conversion of 37 steel industrial windows at the

second floor level into doors to facilitate egress and provide access to the canopy roof, and the conversion of a total of 76 windows into operable casements on the second and third floor levels. All extant steel industrial metal windows would be retained and preserved and/or repaired. New code-compliant metal pipe railings would be added to and/or replace existing pipe railing on the loading docks and the canopy roof.

In compliance with the Americans with Disabilities Act (ADA), new wheelchair ramps would be built at the north, east, west, and south façades of Building 8. The ramp on the east façade would access a new pedestrian entrance proposed for the first floor level. All the rest would connect to existing entrances. New windows would be inserted above the entrance at the second and the third floor levels of the east facade. The original doors in the main entrance on the west façade would be retained and repaired. However, the construction of the ramp on the west façade would result in modifications to the stair itself in order to comply with ADA regulations and local codes. The existing cheek walls would not be affected, however.

G. Analysis of Project-specific Impacts: Building 8

In this section, we analyze the proposed project for compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The Rehabilitation Standards provide useful guidance for reviewing work to historic properties.¹ Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the Rehabilitation Standards have been adopted by local government bodies across the country for reviewing work to historic properties. The Rehabilitation Standards comprise a useful analytical tool for analyzing the potential impacts of changes to historical resources, including new construction inside or adjoining historic districts.

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

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

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

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 change in use or program.³ The first step in analyzing a project’s compliance with the Rehabilitation Standards is to identify the resource’s character-defining features, including characteristics such as design, materials, detailing, and spatial relationships. Once the property’s character-defining features have been identified, it is essential to devise a project approach that protects and maintains these important materials and features, meaning that the work involves the “least degree of intervention” and that important features and materials are safeguarded throughout the duration of construction.⁴

In the case of Building 8, its character-defining features include its smooth concrete surfaces, flat roof, horizontal massing intersected by strong vertical accents (towers), steel industrial sash windows, original steel personnel doors at the west façade, curved walls flanking the entrances, the canopy over the main entrance, and canopy with curved support above the loading docks on the north and south façades.

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.

The proposed project would convert Building 8, now a vacant warehouse, into a light industrial “work-live” and “maker space.” The majority of the alterations required by the change in use would occur inside the building and on the roof where they would be minimally visible from public rights-of-way. The top of the common room enclosure would be visible from the intersection of West Ranger Avenue and Saratoga Street and from a portion of West Ranger Avenue, between the western and middle towers of Building 8. The other changes are largely minor in scope and scale, preserving the building’s industrial aesthetic and use.

In conclusion, 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.

As mentioned previously, the majority of the changes that would be made to Building 8 would occur inside the building and on the roof, minimizing visible changes to the building’s four exterior façades. Proposed modifications to the building’s character-defining features, including its windows, the canopy, and the loading docks, are relatively minor in scope, especially given the massive size and scale of the building, and are entirely reversible. The most significant changes to the exterior façades would be modifications to the existing steel industrial windows, one panel of each window would be retrofitted to make it operable to facilitate egress, access to the roof of the canopies, and provide access to light and air.

³ Ibid., 63.

⁴ Ibid.

In conclusion, 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.

The proposed project would not add any conjectural features or elements from other historical properties to Building 8. All of the new work, including the vertical addition, the skylights, and the storefronts, are designed in a contemporary architectural vocabulary that is compatible with, yet differentiated from, the adjoining historic fabric.

In conclusion, the proposed project complies with Rehabilitation Standard 3.

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

The proposed project would remove virtually all post-1945 changes to Building 8, including all steel roll-up doors, the sky bridge, and the cantilevered addition on the south façade. None of these changes have gained significance in their own right. The 1970s-era painted signage above the main entrance, which is not a character-defining feature, will likely be retained and preserved.

In conclusion, 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.

Building 8 is a warehouse built of commonplace industrial materials, including cement plaster over concrete. As a utilitarian building, Building 8 does not display any notable examples of traditional craftsmanship. Nonetheless, the proposed project would retain all of the building's functional and plain exterior materials and finishes without change.

In conclusion, the proposed project complies with Rehabilitation Standard 5.

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.

Building 8 has been vacant for almost two decades, and despite being made of durable materials, such as concrete and cement plaster, deterioration and vandalism have taken a toll on the building's exterior. Though the building's shell appears to be in good condition, a good number of the windows at the first floor level have been broken. Breakage at the second and third floor levels is not as severe, but there

are still many broken windows and some missing awning sashes. A physical conditions assessment is beyond the scope of this memorandum, but a cursory inspection of the building's exterior suggests that paint delamination and surface corrosion are present on some of the steel windows. Overall, the extant windows appear to be salvageable but they will certainly require repair and conservation. The project sponsor intends to retain the existing windows and rehabilitate them. New glass will replace broken panes and new metal sashes will be fabricated to replace missing awning sashes. Any replacement sashes will match the original in terms of materials; finish; color; and muntin, rail, and stile profile.

In conclusion, the proposed project complies with Rehabilitation Standard 6.

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.

The preliminary drawings for the proposed project do not call for any chemical treatments to be used, and though such information is usually not specified until later, it is obvious that Building 8 will need to be repainted. Physical treatments would be used to remove delaminated paint, including hand-scraping and sanding. The gentlest effective methods would be used to avoid damaging the building's character-defining materials, especially its cement plaster finishes and metal windows and doors. No harmful methods, such as sandblasting, overly caustic strippers, or flame-based paint stripping methods would be used.

In conclusion, the proposed project complies with Rehabilitation Standard 7.

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, a review of the preliminary plans indicates that there will be little new excavation. If any archaeological resources are encountered during excavation, work would be temporarily halted to allow a mitigation plan to be instituted.

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.

The proposed project would add a vertical addition to the roof of Building 8. The addition would rise 21' above the roof and it would be set back 40 feet from the north and south façades, approximately 140 feet from the west façade, and approximately 320 feet from the east facade. There would also be a 6'-high glass wind wall set back 20 feet from the east façade. Additional changes to the building's exterior

volume include four new skylights, including a larger pyramidal-roof skylight at the eastern part of the roof. The new addition, wind wall, and skylights would all be set back from the building's parapets to entirely conceal or minimize their appearance from surrounding public rights-of-way. Indeed, the only feature that would be visible would be the top of the common room addition, which would be visible from the intersection of West Ranger Avenue and Saratoga Street and a few sections of West Ranger Avenue across the from the building. The addition, along with the wind wall and skylights, are designed in a contemporary architectural vocabulary using modern materials.

In conclusion, 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.

The proposed vertical addition, wind wall, and skylights could all be removed, leaving the overall form of Building 8 intact. Furthermore, the proposed aluminum storefronts could be removed and replaced with steel roll-up doors.

In conclusion, the proposed project complies with Rehabilitation Standard 10.

H. Analysis of Project-specific Impacts: Landscape

The proposed project would make very few changes to the landscaping of Building 8, but because the building's three lawn panels comprise the largest patch of landscaping in the Shops Area, it is analyzed in this memorandum. For our analysis, we used *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 avoid unnecessary repetition we prioritized *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (Cultural Landscape Guidelines) because it is based on the Secretary of the Interior's Standards and specifically tailored for use in the NAS Alameda Historic District.

Several of the studies completed on NAS Alameda since 1992 have concentrated on the station's historic designed landscape. 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 placed along axially arranged, landscaped malls that intersect at the station's Administrative Core. NAS Alameda was initially designed without a planting plan, but the site's 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 small 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 augment what had been salvaged from the GGIE.

The landscaping program concentrated on the malls in the Administrative Core and in the adjoining Residential Area. The palette was simple and straightforward, consisting of grass turf and ice plant in the malls, grass and foundation plantings surrounding the buildings, and street trees, including Monterey pines, black acacia, and fan palms. Several ceremonial areas within the Administrative Core, including the entrance mall, were planted in multi-colored fields of ice plant.

For the most part, the Shops Area and the Operations Area were not landscaped. Dedicated to aircraft assembly, maintenance, and storage, these utilitarian zones were off-limits to most visitors. That said, there are a few formally planted areas, particularly at the fronts of the buildings adjoining the main north-south axis along Saratoga and Lexington streets, including Buildings 6, 8, 62, and 114.

Also important are the view corridors that align with the formally landscaped malls. During World War II, the integrity of these corridors was partially compromised when new buildings were hastily constructed in areas originally set aside for open space. Nonetheless, enough remains of the original landscape plan to impart their original intent.

The evaluation standards 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 specifically with the Shops Area, within which Building 8 is located. 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. The following sections analyze the proposed rehabilitation of Building 8 under each of the seven areas. Our response to each of the numbered points is presented under each of the bullet points below each heading.

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 from the Main Gate to Building 1 through Building 39 and the Seaplane Lagoon;
 3. Preserve and maintain deep building setbacks, including all those with lawns and foundation plantings;
 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 character-defining large, open areas between buildings.
- (1) The proposed project would not impact the existing pattern of orthogonal roads and building footprints in the Shops Area;
 - (2) The proposed project would not disrupt the north-south axis of the Shops Area;
 - (3) The proposed project would ever so slightly reduce the size of the landscaped area to the west of Building 8 by building a new wheelchair ramp. This area, which until 1979 had

foundation plantings, presently has a concrete footpath, grass, and four small trees that are not identified in any study of the Historic District’s landscaping. The proposed project would not result in the removal of any of the black acacias, which are identified in cultural landscape studies as being historic.

- (4) As mentioned above, the construction of the wheelchair ramp would affect a small section of the lawn on the west side of Building 8. To reduce its potential visual impact, the project would add foundation plantings in front of it.

Views/Vistas:

1. Retain and preserve views:
 - a. South along Lexington Street and Saratoga Street from entry mall to Seaplane Lagoon;
 - b. Along West Tower Avenue;
- (1) The proposed project, which is primarily confined to the interior and roof of Building 8, would have minimal effect on any views or vistas in the vast majority of the Shops Area.

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.

- The proposed project would not affect the topography of the Shops Area.

Vegetation:

Protect and maintain character-defining deep panels of low ground cover between sidewalks and building foundations, along with appropriate foundation planting beds/plantings.

- As mentioned previously, the construction of a wheelchair ramp north of the main entrance on the west side of the building would affect a small portion of the lawn. This area, which originally contained planting beds, was altered in 1979 and now contains a sidewalk and four small trees (not to be confused with the black acacias, which would not be affected). The wheelchair ramp would be screened from view by new foundation plantings.

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 between buildings.

- The proposed project would not add a new building to the site and it would not affect circulation within the Shops Area. Existing parking areas would continue to be used for parking and existing loading docks would continue to be used for comparable uses as they were historically.

Water Features:

There are no water features in the Shops Area.

Structures, Furnishings and Objects:

Retain and preserve building features that integrate with elements of the historic designed landscape, such as the planters flanking building entries.

- The proposed project would visually affect the west entrance of Building 8 to construct the wheelchair ramp. Physical impacts would be limited, however, because both cheek walls would remain. Changes to the feature include the addition of new metal railings and modifications to the stairs themselves so the top landing is at the same level as the floor inside the building.

In conclusion, the proposed project complies with all 10 Rehabilitation Standards and the Cultural Landscape Guidelines.

I. Conclusion

The proposed project, which would rehabilitate Building 8 at Alameda Point for work-live and light industrial uses, complies with all 10 Rehabilitation Standards and the NAS Alameda Cultural Landscape Guidelines. Under CEQA, a project that complies with all ten Rehabilitation Standards is considered to have a less-than-significant effect on the environment.⁵ It is my professional opinion that the proposed project would not alter in an adverse manner those characteristics that justify Building 8's inclusion as a contributor to the NAS Alameda Historic District, or the 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

⁵ CEQA Guidelines, Subsection 15064.5(b) (1).