

Memorandum

Date July 6, 2016

Project NAS Alameda Seaplane Lagoon Ferry Terminal

To Michelle Giles
Redevelopment Project Manager
City of Alameda, Base Reuse Department
2263 Santa Clara Avenue, Room 130
Alameda, CA 94501

From Christopher VerPlanck
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Topic Compliance with the Secretary of the Interior's Standards, Character Preservation Guide, and Cultural Landscape Guidelines

Copied

Via Email

Dear Ms. Giles,

VerPlanck Historic Preservation Consulting prepared this memorandum in response to your request for my professional opinion as to whether a proposed project at Alameda Point complies with the *Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (Character Preservation Guide), the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (Cultural Landscape Guidelines), and the *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (Rehabilitation Standards). As you know, the proposed project includes the construction of a new ferry terminal, including a new pier, landside transportation infrastructure and landscape improvements, and a surface parking lot. The requirement that the project be reviewed for compliance with these standards and guidelines stems from the fact that the new pier would extend into Seaplane Lagoon, which is part of the locally and National Register-listed Naval Air Station (NAS) Alameda Historic District (Historic

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District). Additionally, other aspects of the proposed project are located adjacent to Seaplane Lagoon, and “water-connected projects,” even when they are not located within the boundaries of the Historic District, are required to receive the same level of review as projects within the boundaries of the Historic District.¹ It is our conclusion that the proposed project complies with the Character Preservation Guide, the Cultural Landscape Guidelines, and the Rehabilitation Standards.

A. Credentials

Christopher VerPlanck, the primary author of this memorandum, has 18 years of experience researching and documenting historical properties in the San Francisco Bay Area and an equivalent amount of experience analyzing projects for compliance with the Secretary of the Interior’s Standards. In addition, Mr. VerPlanck has worked in Alameda for over a decade. While working at Page & Turnbull, Mr. VerPlanck authored *NAS Alameda Historic District Assessment and Historic Preservation Strategy* in 2004. As an independent preservation consultant active since 2007, Mr. VerPlanck has consulted on several other projects in Alameda, including most recently the Del Monte Cannery and the William T. May Residence at 951 Pacific Avenue. He is currently working on the Alameda Marina property on Clement Avenue. Mr. VerPlanck meets the Secretary of the Interior’s Professional Qualification Standards for both History and Architectural History. Mr. VerPlanck was assisted in his research and analysis by Stacy Farr, an independent historic preservation consultant who also meets the Secretary of the Interior’s Professional Qualification Standards for both History and Architectural History.

B. Methodology

We visited the site of the proposed project on June 22, 2016 and took photographs. We 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 the former naval air station, concentrating instead on the site and on the analysis of the project for compliance with the Character Preservation Guide, Cultural Landscape Guidelines, and Rehabilitation Standards.

The analysis in this memorandum follows the format outlined in Attachment A of the Mitigation Monitoring and Reporting Program (MMRP) prepared for the Seaplane Lagoon Ferry Terminal of the Alameda Point Project. Mitigation Measure 4.D-1a describes the procedures to be undertaken when projects are located within the boundaries of the NAS Alameda Historic District and adjacent to Seaplane Lagoon. Central to our analysis is reviewing any proposed project that could affect the Historic District for compliance with the following documents: *Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997), *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996), and *The Secretary of*

¹ Urban Planning Partners Inc., Mitigation and Monitoring Reporting Program, Seaplane Lagoon Ferry Terminal of the Alameda Point Project, CEQA Addendum to the Alameda Point Project Environmental Impact Report, March 2016, A-10.

the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings (1997). Mitigation Measure 4.D-1a also requires an analysis of project impacts to the integrity of the Historic District as a whole.

C. Regulatory Environment

As mentioned previously, the proposed project includes elements that will be located within the NAS Alameda Historic District and elements that will be located outside of the Historic District but directly adjacent to Seaplane Lagoon (**Figure 1**). NAS Alameda Historic District, which was listed in the National Register of Historic Places (National Register) in 2013, encompasses the central portion of the former naval air station with a period of significance spanning the years 1938 to 1945. The core of the facility was designed by the U.S. Navy Bureau of Yards & Docks in the Streamline Moderne style. The Historic District includes four principle zones: the Administrative Core, Residential Area, Shops Area, and Operations Area. The project site is located in and adjacent to Seaplane Lagoon, which was constructed in 1940 and is part of the Operations Area. The National Register nomination found NAS Alameda to be significant for its architecture, its contributions to community planning and development, its landscape architecture, and its military history. Because the proposed project is located within and adjacent to the eastern boundary of the NAS Alameda Historic District, the project must receive a Certificate of Approval from the Historical Advisory Board (HAB).



Figure 1. NAS Alameda Historic District, with the boundary of the district in blue and the proposed project site noted by a black star. Source: JRP Consulting

The proposed project site is largely located within the Waterfront Town Center Specific Plan (Town Center Plan), an area plan approved by the Alameda City Council in July 2014 (**Figure 2**).² The Town Center Plan encompasses roughly 150 acres, including Seaplane Lagoon, the seaplane taxiway and parking apron, three of the seaplane hangars, and the area surrounding the Ralph Appezato Memorial Parkway entrance to Alameda Point.

In June 2015, the Alameda City Council approved a development plan for “Site A,” a 68-acre section within the Town Center Plan area. Site A is bounded by Main Street to the east, West Tower Avenue to the north, Pan Am Way to the west, and an unnamed future street running roughly parallel to the existing east-west segment of Skyhawk Street. Site A also includes a “panhandle” on the taxiway, west of Pan Am Way and north of Seaplane Lagoon. “Site B” is an 82-acre section south of Site A that spans both the Town Center Plan area and the Enterprise District. Site B is allocated for a commercial project(s) with a focus on a major sales tax generator or a corporate “build-to-suit” user(s) that generates significant jobs or other catalytic economic benefits.

The new ferry terminal is located within Site B, but will be constructed as part of the Site A development, contingent on funding availability.³ Ideally, the ferry terminal would be completed within a year of the first residents moving into Site A. Those residents would walk less than one-quarter of a mile to the new ferry service.

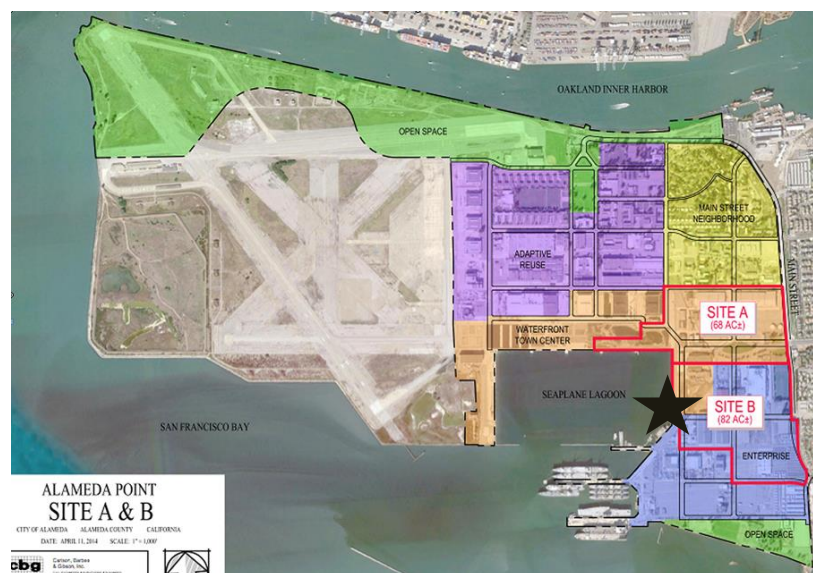


Figure 2. Map showing the location of the Waterfront Town Center, including Site A and Site B, with the proposed project site noted by a black star. Source: Carlson, Barbee & Gibson Civil Engineering

² A small portion of the proposed project is located within the Enterprise District, which is south of the Town Center Plan.

³ Memo from Base Reuse Director and Redevelopment Project Manager, Base Reuse to Planning Board Regarding Study Session to Provide Direction on Seaplane Lagoon Ferry Terminal Design, May 9 2016.

D. Site Description

The proposed project site is located at the east side of Seaplane Lagoon. The project includes a new fixed pier that would extend into the lagoon; landside transportation infrastructure and landscape improvements that would be located along Ferry Point Road; and a surface parking lot that would be located east of Ferry Point Road. There are no permanent buildings proposed for the project site, which is presently paved in concrete or asphalt, or covered with gravel and grass. The following section describes the site in detail, and briefly describes the nearby buildings, objects, and areas that may be affected by the proposed project.

Seaplane Lagoon: Seaplane Lagoon is located at the south end of the NAS Alameda Historic District with Ferry Point Road running along its east side and Pier 1 adjacent to its southeast corner. Enclosed by riprap rock walls on the west and the east and a concrete bulkhead on the north, the lagoon encloses approximately 110 acres. As outlined in the National Register Registration Form for NAS Alameda Historic District, Seaplane Lagoon also comprises eight structures, including the bulkhead, jetty, Ramp 1, Ramp 2, Ramp 3, Ramp 4, Dock 3 (Fishing Pier), and Dock 4 (**Figure 3**). Pier 1 is not included in the NAS Alameda Historic District.

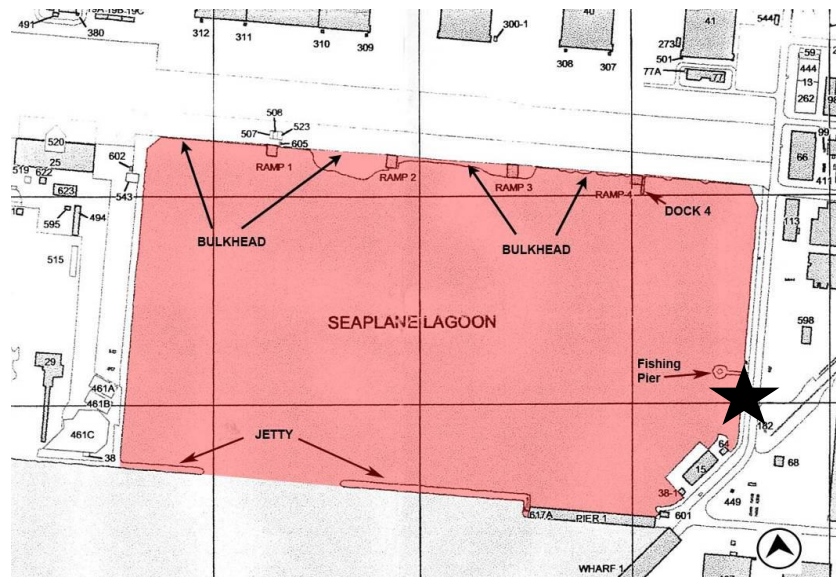


Figure 3. Seaplane Lagoon, with the proposed project site noted by a black star. Source: JRP Consulting

Seaplane Lagoon's entrance is located near its southwest corner, between two jetties that form its southern edge; the entrance measures approximately 800 feet across (**Figure 4**). Along the east side of the lagoon, there is a deteriorating fishing pier that terminates with a circular platform (portions of which were likely part of Dock 3) (**Figure 5**). Along the lagoon's northern side, running from west to east, are Ramps 1, 2, 3, and 4. All of the ramps are connected to a concrete apron that extends the length of the north side of the lagoon (**Figure 6**). The apron rests on a bulkhead and is supported by concrete

pylons. According to the National Register nomination, the east-west oriented bulkhead along the northern edge of Seaplane Lagoon defines the boundary of the land and water portions of the former naval air station and it provides a strong orthogonal element of the original station plan.



Figure 4. The west edge of Seaplane Lagoon, facing south, with the entrance to the lagoon and two jetties visible in the distance



Figure 5. The east edge of Seaplane Lagoon, facing north, with the fishing pier in the middle distance



Figure 6. The north edge of Seaplane Lagoon, facing west, with the ramps at left and the apron and bulkhead at center

According to the National Register nomination, the character-defining features of Seaplane Lagoon include its footprint of open water and six of its constituent contributing structures: the bulkhead, the jetty, and the four ramps. The character-defining features of the bulkhead include its vertical face, straight linear geometry, and diagonal supports. The character-defining features of the jetty include its sloped rock face and straight linear geometry. The character-defining features of the ramps include their sloped surface bridging land and water, and plain concrete surfaces on wooden piers.

Ferry Point Road: Ferry Point Road runs along the east side of Seaplane Lagoon. The road begins at the intersection of West Tower Avenue and Pan Am Way, and continues south approximately 0.8 miles, terminating at West Hornet Avenue. The western edge of Ferry Point Road marks the eastern boundary of the NAS Alameda Historic District. Therefore, the roadway itself, as well as the paved angled parking spots between the roadway and Seaplane Lagoon, are located outside of the Historic District.⁴ However, because it is adjacent to Seaplane Lagoon, the portion of Ferry Point Road that will be affected by the proposed project – an area from West Atlantic Road to the north to the westward bend in the road just north of West Oriskany Avenue to the south – is described below.

The portion of Ferry Point Road that will be affected by the proposed project is a level, two-way, asphalt-paved roadway that measures approximately 36'-9" wide. West of the roadway is a band of angled, asphalt-paved parking stalls that measures approximately 30' wide. East of the roadway is a concrete sidewalk that measures approximately 12' wide, with no curb. The sidewalk ends

⁴JRP Historical Consulting, LLC, *National Register of Historic Places Registration Form for NAS Alameda Historic District*, 2012, Sections 9-end page 96.

approximately 180' below the westward bend in Ferry Point Road, south of which, a curb separates the roadway from an open field (described below).



Figure 7. Ferry Point Road, facing north, showing the angled parking stalls at left, roadway at center, curb right of center in the foreground, sidewalk right of center in the distance, and the open field at the far right



Figure 8. Ferry Point Road, facing south, showing the angled parking stalls at right (occupied by utility vehicles), roadway right of center, and the sidewalk left of center

Open Field: There is an open field east of Ferry Point Road where a portion of the proposed project's surface transportation infrastructure and landscape improvements, as well as the surface parking lot, will be located. It is outside the Historic District. The open field has a generally triangular footprint, with Ferry Point Road bordering it to the west, Building 14 and its parking lot to the north, and a former rail spur to the east. The rail spur has been filled with concrete and is presently used as a pedestrian path (**Figure 9**). The pedestrian path is illuminated by paired lights mounted atop wooden utility poles.



Figure 9. Open field, facing northeast, with Ferry Point Road at the far left, the field at the center, and the former rail spur which has been converted to a pedestrian path at the right

The open field contains a mixture of wild grasses and weeds, gravel, and paved areas. A large portion of the open field is enclosed by a chain link fence (**Figure 10**). Within this enclosure, directly in the middle of the field, is a concrete pad with three pairs of concrete tank mounts, surrounded by low concrete walls (**Figure 11**). Vehicular access to the enclosure is provided by a gate at its southern perimeter, which is accessed via a paved driveway from Ferry Point Road. The paving is in poor condition, indicating that it has not been used for a while.



Figure 10. Chain link fence enclosure, facing southeast



Figure 11. Concrete tank mounts within the enclosure, facing southeast

Toward the north side of the open field are two sets of triple hatch doors which provide access to underground utilities (**Figure 12**). The hatch doors are surrounded by steel tube railings, presumably to prevent them from being driven over. There is a handful of raised concrete pads in the open field, the largest of which are located close to Ferry Point Road. There is one mature tree in the open field, which is located alongside the pedestrian path and shelters a wooden bench (**Figure 13**).



Figure 12. Hatch doors at the north side of the open field, facing east



Figure 13. Mature tree alongside the pedestrian path, facing southwest

Building 15: Building 15 is located near the southeast corner of Seaplane Lagoon, on Ferry Point Road, and it is a contributor to the NAS Alameda Historic District. Building 15 is described here because the new fixed pier that would be constructed as part of the proposed project would be located approximately 120' north of it.

Originally built as a boathouse, Building 15 currently houses an environmental response services firm. The rectangular-plan building comprises two distinct sections, both of which rest on concrete and wood

piers. Both sections are capped by flat roofs (**Figure 14**). The northeast wing is two stories high, while the southwest wing is a one-story, covered boat dock. The two-story portion is made of board-formed concrete. The exterior is punctuated by a semi-regular grid of metal fixed, double-hung, and pivot-sash windows. The building is accessed by three metal doors. One door is on the first floor level of the southeast (primary) façade, and the other two are on the second floor level on the northeast façade – both are reached by a metal stairway with pipe railings. The primary entrance is sheltered by cantilevered concrete canopy. A PVC pipe and canvas canopy covers the walkway from the wharf to the main entrance. The one-story boat dock section of Building 15 is made of a combination of board-formed concrete and corrugated metal panels (**Figure 15**). Its southeast façade is essentially a window wall, comprising fixed steel industrial windows with operable pivot-sashes. A double-leaf metal door with solid metal transom is located in the center bay; it is accessed by a metal walkway and railing. Another metal door is located on the southwest façade. The northwest façade includes a dock and three projecting piers.



Figure 14. Building 15, primary façade, facing northwest
Source: JRP Consulting



Figure 15. Building 15, side and rear facades, facing west

Building 15 shares character-defining features with many of the other shop facilities in the NAS Alameda Historic District, including its board-formed concrete walls, steel industrial sash windows, flat roofs, concrete canopies, and the covered docks at the southeastern portion of the building.

Building 64: Building 64 is located near the southeast corner of Seaplane Lagoon, north of Building 15. Also facing Ferry Point Road, Building 64 is a contributor to the NAS Alameda Historic District. Similar to Building 15, Building 64 is described in this memorandum because the proposed pier that would be constructed as part of the proposed ferry terminal would be located approximately 120' north of it.

Building 64 was originally constructed as a boiler house, containing the boilers that provided steam heat for the adjoining piers and miscellaneous shops throughout the station. In 1989, Building 64 was converted to the home of the Ship Intermediate Maintenance Activity (SIMA), which emphasized underwater ship maintenance work. Building 64 is a one-and-a-half story, 986-sf building with a rectangular plan and flat roof (**Figure 16**). The building is made of board-formed concrete and it rests on concrete and wooden piers that are sunk into Seaplane Lagoon. The southeast (primary) façade has a corrugated metal roll-up door at the right, with a fixed multi-light window above the door. The southwest façade has a partially glazed door at the center. The door is sheltered beneath a cantilevered concrete canopy and flanked by one-over-one metal-sash windows. Concrete and wood walkways with metal railings extend from the wharf over the water to both the roll-up door and the personnel door. Fenestration on the remainder of the building includes vertically oriented, three-part, multi-light steel industrial windows with operable pivot sashes (**Figure 17**).



Figure 16. Building 64, primary and southwest facades, facing northeast
Source: JRP Consulting



Figure 17. Building 64, northeast and rear facades, facing west

Like Building 15, Building 64's character-defining features include its unembellished board-formed concrete walls, flat roof, vertically oriented steel industrial windows, concrete canopy, and pier foundation.

Building 113: The proposed project includes the realignment of Ferry Point Road to curve around the south and east sides of Building 113. Although Building 113 is not located within the boundaries of the NAS Alameda Historic District, it is described below because of its proximity to the project site. Building 113 is located at the southeast corner of Ralph Appezato Memorial Parkway and Ferry Point Road. It is a one-story-and-mezzanine, steel-frame, corrugated metal-clad industrial building capped by a gable roof (**Figure 18**). The building has large metal "barn" doors on the short ends and a symmetrical fenestration pattern consisting of industrial metal-sash windows on the long ends. The utilitarian building (erected 1943) was used for a variety of purposes over time, including warehousing and jet engine maintenance. The building was most recently occupied by a scrap metal dealer.



Figure 18. Building 113, facing southwest

Building 14: Although Building 14 is not located within the boundaries of the NAS Alameda Historic District, it is described below because of its proximity to the project site. The proposed project includes a paved parking area which would be located directly south of Building 14. The proposed project also entails the realignment of Ferry Point Road around the south and east sides of Building 113, which would pass close to the northwest corner of Building 14.

Building 14 is located on the east side of Ferry Point Road, set back behind a large parking lot (**Figure 19**). The building comprises two conjoined rectangular volumes, which are connected by a one-story gangway. The volume at the north side of the building is one-and-a-half stories in height and clad in wood siding. It has metal “barn” doors at the primary (west) façade, and a symmetrical fenestration pattern consisting of large, industrial metal-sash windows. The volume at the south side of the building is concrete and has a larger footprint. The west portion is one-story in height, and the west façade has four regularly spaced, industrial metal-sash windows. Massing at the remainder of this volume is very irregular. There are several two-story volumes along the north side, some with windows, and a band of large canted concrete structures, supported by concrete posts and capped by metal ductwork, along the south side (**Figure 20**).

Building 14’s irregular appearance in part results from the fact that it was constructed in stages between 1941 and 1943, modified substantially in 1945 and 1948, with additional changes occurring over the subsequent years.⁵ The building served as a test cell for jet engines. The two-story elements along the north side of the building served as intake vents, and the concrete structures along the south side of the

⁵ JRP Historical Consulting, “Combined Specific Buildings Survey and Evaluation Report / Cold War Era Historic Resources Survey and Evaluation Report,” prepared for Naval Facilities Engineering Southwest, September 2011, page 273.

building were engine-testing mounts. The metal ductwork atop these structures served as mufflers, vents, and blast shields. The building is currently occupied by a furniture studio and a printing press.



Figure 19. Building 14, facing southeast



Figure 20. Building 14, facing northeast

Building 162: Although Building 162 is not located within the boundaries of the NAS Alameda Historic District, it is described in this memorandum because of its proximity to the project site. The proposed project includes the realignment of Ferry Point Road, which would curve around the south and east sides of Building 113, and then between Buildings 113 and 162 before meeting Ralph Appezato Memorial Parkway.

Building 162 is located on the south side of Ralph Appezato Memorial Parkway (West Atlantic Avenue), near Viking Street (**Figure 21**). The large building has a concrete foundation and wood shiplap siding. It has a generally rectangular footprint, with a one-story section facing West Atlantic Avenue, and two larger, conjoined two-story volumes to the south. Located at the northwest corner of the building, the primary entrance contains a pair of glazed doors set within a heavily glazed window-wall sheltered by a flat canopy. The wood-clad exterior is articulated by wood-frame ribbon windows, including both double-hung and single-light hopper sashes. The one-story volume on West Atlantic Avenue has a monitor roof, two sliding “barn” doors, and three pedestrian entrances. Building 162 was constructed in 1945 and was remodeled after World War II, with the addition of the one-story volume on the north side of the building. Building 162 was used for overhauling piston and jet engines.⁶ Its current use is unknown.

⁶ Ibid., page 67.



Figure 21. Building 162, facing southeast. Source: Google Maps.

E. Significance of NAS Alameda Historic District

As mentioned previously, NAS Alameda Historic District was added to the National Register National Register in 2013. The National Register nomination, 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 structures and one contributing site – the historic designed landscape at the center of the district.

NAS Alameda is eligible under Criterion A as a naval air station constructed in the late 1930s as part of the Navy's efforts to make naval aviation a centerpiece of its operations. The improvement of aircraft launching techniques and aircraft carriers themselves spurred on these efforts, as well as growing concerns over geopolitical changes in Europe and Asia. NAS Alameda was the first naval air station built in the San Francisco Bay Area, and it joined five other facilities across the country, including NAS Norfolk (Virginia), NAS San Diego, NAS Seattle, NAS Jacksonville, and NAS Quonset Point (Rhode Island). Built between 1939 and 1941, NAS Alameda played a critical role in supporting carrier-based warfare against Japanese forces in the Pacific Theater. It was homeport to 23 ships, 22 air squadrons, and 1,500 aircraft. One of NAS Alameda's best-known historical highlights 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, with modern design and landscape architecture. With its sophisticated Beaux-Arts plan, which made use of

well-defined axial malls and different building types grouped into a hierarchical arrangement of discrete functional areas, NAS Alameda was designed not only to be efficient, but also to be an attractive facility that expressed the Navy's cultural traditions. The employment of extensive landscaping, public artwork, and contemporary architectural styling – in the case of NAS Alameda, the Streamline Moderne style – made NAS Alameda rise above military utilitarianism and become an attractive place to live, work, and socialize.

During World War II and the Korean and Vietnam Wars, the total base design concept at NAS Alameda was relinquished in favor of expediency. The Navy simply shoehorned new buildings into gaps within the original base or in the undeveloped area east of Pan Am Way and Ferry Point Road. With very few exceptions, the buildings constructed during the Cold War were utilitarian and did not have any landscaping. The eastern part of the station, where the project site is located, is dominated by non-descript industrial buildings and apartment complexes dating to the late 1940s, 1950s, 1960s, and 1970s. After the end of the Cold War, the so-called "Peace Dividend" resulted in many bases being identified for closure as part of the Base Realignment and Closure (BRAC) Act of 1990, including NAS Alameda, which closed in 1997.

F. Project Description

The following project description is based on a conceptual design submittal entitled *Alameda Point-Ferry Terminal Landside Improvements Associated with Site A Development*, dated May 9, 2016. The project team includes Alameda Point Partners (Project Sponsor), April Philips Design Works (Landscape Architect), BKF Engineers (Civil Engineer), and Moffatt & Nichol (Marine Terminal Consultant).

As previously described, the proposed project includes the construction of a new ferry terminal, which would include a new pier, landside transportation infrastructure and landscape improvements, and a surface parking lot. Preparatory work will include the removal of the deteriorated timber pier at the east side of Seaplane Lagoon and the removal of some asphalt paving along the existing roadway and angled parking area. The existing riprap wall of Seaplane Lagoon would not be affected by the proposed project.

The new pier would be located at the east side of Seaplane Lagoon, approximately 200' north of where the riprap wall turns towards the southwest. The design for the new pier consists of three elements: a fixed pier, a gangway, and a float. Pedestrians would access the fixed pier from Ferry Point Road both by a short, concrete stair and by two paved ramps. The fixed pier would have a concrete deck that measures 88' long and 20' wide, with guardrails along both sides. The metal gangway would be attached to the west end of the fixed pier, and it would be 92'-5" long. Hinged on its inland side so that it may rise and fall with the tides, the gangway would have metal guardrails and a grated walkway surface to improve traction. The float would be attached to the west end of the gangway. The float would be 135' long and 42' wide, and it would include five platforms and six ramps to facilitate docking, and boarding. The float would also have metal handrails.

The northern section of Ferry Point Road would be re-routed around the south side of Building 113 and northward between Buildings 113 and 164, where it will intersect with Ralph Appezzato Memorial Parkway (West Atlantic Avenue). The rebuilt portion of Ferry Point Road would consist of a 22'-wide auto roadway, a 10'-wide bike path, and a 5'-wide sidewalk. South of Building 113, Ferry Point Road would be narrowed and the angled parking alongside the east side of Seaplane Lagoon would be removed. This section of the newly configured roadway would include, from west to east, a 29'-wide pedestrian promenade, a 12'-wide bike path, a 3'-wide buffer, a 22'-wide auto roadway, and a 12'-wide sidewalk. The promenade would include six pedestrian "nodes," spaced at 100' intervals, which would include crosswalks and seating areas. The southernmost pedestrian node would serve as a transit plaza, with access to the ferry pier and a public transportation shelter. The auto roadway would end at a bus turnaround loop, which would be landscaped at its center and along its edges with native plantings.

The parking lot for the proposed ferry terminal would be located east of Ferry Point Road. It would be paved in asphalt, though the existing concrete pad at the center of the open field would be retained. The parking lot would have a rectangular footprint and it would include 400 parking stalls, arranged in five rows along a north-south axis. Four painted pedestrian walkways would connect the parking lot to Ferry Point Road and the promenade, along an east-west axis. There would be a band of native plantings between the parking lot and the roadway, and trees located in planters throughout the parking lot. Auto access to the parking lot would be provided at the north and south sides of the lot, with a wider "kiss-and-ride" drop-off lane on the south side of the parking lot.

Many elements of the proposed project are described on plans as being "interim" and include flexible, portable, and easily removable materials, should the site need to be redesigned when Site B is developed.

G. Analysis of Project-specific Impacts

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

Secretary of the Interior's Standards: Because the proposed project includes new construction both within and directly adjacent to the NAS Alameda Historic District, we will use *The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (Rehabilitation Standards). The Rehabilitation Standards provide useful guidance for reviewing work to historic properties.⁷ Developed by the National Park Service for reviewing certified rehabilitation tax

⁷ 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

credit projects, the Standards have been adopted by local government bodies across the country for reviewing proposed work to historic properties under local preservation ordinances. The Rehabilitation Standards constitute a useful analytical tool for understanding and describing the potential impacts of changes to historical resources, including new construction inside or adjoining historic districts.

Compliance with the Rehabilitation Standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under the California Environmental Quality Act (CEQA). Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historical resource.⁸ Projects that do not comply with the Rehabilitation Standards may or may not cause a substantial adverse change in the significance of an historical resource and would require further analysis to determine whether the historical resource would be “materially impaired” by the project under *CEQA Guidelines* 15064.5(b).

Rehabilitation is the *only* one of the four treatments in the Standards (the others are Preservation, Restoration, and Reconstruction) that allows for the construction of an addition or other alteration to accommodate a change in use or program.⁹ 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.¹⁰

The first step in ascertaining whether a project complies with the Rehabilitation Standards is to determine if the project would retain the bulk of the property’s “character-defining features.” In the case of the proposed project, which would not result in the demolition of any contributing elements to the NAS Alameda Historic District, the only potential effects could be physical impacts to Seaplane Lagoon visual impacts to the setting of the adjoining NAS Alameda Historic District, in particular, impacts to sightlines across Seaplane Lagoon and within the vicinity of Buildings 15 and 64. The sections below present an evaluation of the proposed project for compliance with each of the 10 Rehabilitation Standards. Because the proposed project would have no physical impacts on any buildings or structures, several of the Standards would not apply. These will be noted below.

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.

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

⁹ *Ibid.*, 63.

¹⁰ *Ibid.*

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 construct a new pier in Seaplane Lagoon to be used by passenger ferries. This use differs slightly from the historic use of Seaplane Lagoon, which was the take-off and landing area for patrol, rescue, and transport seaplanes. However, this new use is still a maritime use and it would require no physical changes to Seaplane Lagoon or the Historic District as a whole.

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.

The proposed new pier's concrete deck would connect to land immediately east of the riprap wall, at a point outside the boundary of the Historic District. Neither the footprint nor the physical structure of Seaplane Lagoon would be changed. The proposed new fixed pier, gangway, and float would all be low-profile structures, with metal handrails, ramps, and platforms that are only as high as required by health and safety codes. Collectively, they would occupy a very small percentage of the 110-acre lagoon, further minimizing their visual impact.

The landside improvements that are part of the proposed project are located outside of the Historic District boundaries. The parking lot, road relocation, and landscape work are all surface-level features that do not include any permanent new buildings that could change spatial relationships in and around Seaplane Lagoon or the Historic District itself.

In conclusion, the proposed project complies with 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.

All elements of the proposed project would be new construction and would have a contemporary design feel. The proposed project includes no conjectural features or any other elements that would create a false sense of historical development.

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 not affect Seaplane Lagoon or any other elements of the Historic District that have acquired significance in their own right. The proposed project would remove the deteriorated fishing pier at the east side of Seaplane Lagoon, which was constructed ca. 1970 atop a dock that was constructed in 1944. However, because of these changes made after the period of significance, the fishing pier is not a contributor to the Historic District.

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.

The proposed project preserves the riprap wall that defines the eastern boundary of Seaplane Lagoon and it would not physically affect the bulkhead, ramps, or other features of the lagoon or any other Historic District contributor.

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.

The proposed project does not propose to address any deteriorated features within the Historic District, in particular, the riprap wall, which appears to be in good condition.

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 proposed project does not propose the application of any chemical or physical treatments to any contributors to the Historic District.

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, if archeological resources are discovered, standard mitigation measures required by the City of Alameda would assure compliance 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 not destroy any historic materials, features, or spatial relationships that characterize Seaplane Lagoon, Buildings 15 and 64, or any other contributors to the Historic District. The proposed new pier, dock, and float would not physically affect Seaplane Lagoon. In regard to potential visual impacts, they would be small, low-profile, portable structures that are appropriately designed in a contemporary aesthetic in keeping with the utilitarian character of the Operations Area of the NAS Alameda Historic District.

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.

As portable features, all elements of the proposed ferry terminal project could be removed and the essential form and integrity of the NAS Alameda Historic District remain unimpaired.

In conclusion, the proposed project complies with all 10 of the Rehabilitation Standards.

Guide to Preserving the Character of the Naval Air Station Alameda Historic District: Several of the studies completed on NAS Alameda since 1992 have concentrated on the station's historic designed landscapes. The most substantial of these, JRP Historical Consulting's *Cultural Landscape Report for Naval Air Station Alameda* (2012), focuses on how the flat topography of the site, as well as the need for efficiency and functionality, made it a good candidate for a strongly Beaux-Arts-influenced "campus" plan consisting of an orthogonal arrangement of buildings sited along axial landscaped malls that intersect at the station's Administrative Core. NAS Alameda was initially designed without a planting plan, but the site's heavy winds, combined with its location on filled marshland, made securing the silty soil imperative. Devised by landscape architect Emery A. LaVallee, the plan was executed on a relatively miniscule budget, making extensive use of trees, shrubs, and ground cover salvaged from the recently closed Golden Gate International Exposition (GGIE) at nearby Treasure Island. By 1942, one-fifth of the

base was under cultivation, using an on-site nursery to grow the stock needed to augment what had been salvaged from the GGIE.

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

For the most part, the Shops Area and the Operations Area were not landscaped. Dedicated to aircraft assembly, maintenance, and storage, these areas were functional zones not accessible to visitors. Indeed, most of the Shops and Operations areas remain entirely paved with a combination of asphalt and concrete. The only buildings in the Operations Area that had any landscaping were Buildings 20, 21, 22, and Building 77.

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

Although there are no formally designed landscapes within the vicinity of the project site, the project would introduce several new minor landscape features to what has always been a non-landscaped area adjacent to Seaplane Lagoon. The evaluation standards below were taken from *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District* (1997). Within this document is a section that deals with the Operations Area, where Seaplane Lagoon 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. These categories are taken from *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996), and in order to reduce repetitive commentary and analysis, this memorandum analyzes the project with the Cultural Landscape Guidelines, which are specifically tailored to the NAS Alameda Historic District. The following sections analyze the proposed project under each of the seven areas of importance listed above. As with the Rehabilitation Standards, because the proposed project does not include the construction of any new buildings, several of the guidelines do not apply, and this will be noted below.

Spatial Organization:

1. Retain the orthogonal pattern established by the roads and building mass and volume.
 2. Retain and preserve the north-south bi-laterally symmetrical alignment (that extends from the Main Gate to Building 1) through Building 39 and Seaplane Lagoon.
 3. Preserve and maintain the deep setback of low ground cover around Buildings 77, 20, 21, and 22.
 4. The design guidelines for new construction proposed in Section 6.2. General Management and Design Guidelines should address ways to ensure that new building siting, massing, parking areas, and landscape areas are designed in a manner that is compatible with the character-defining features of the historic designed landscape. The design guidelines should address ways to maintain, to the extent feasible, the open qualities of the character-defining spatial organization and views in the Operations Area.
- (1) The proposed project retains the overall orthogonal circulation pattern in the Historic District. The proposed new pier would intersect the east side of Seaplane Lagoon at a right angle. The landside improvements along Ferry Point Road, which are not inside the Historic District, would not introduce any overtly “naturalistic” landscape features.
 - (2) The proposed new pier on the east side of Seaplane Lagoon would not be long enough to interrupt the north-south axis of NAS Alameda. Its east-west alignment would recall the existing fishing pier, which would be removed as part of the project, as well as the jetties on the south side of Seaplane Lagoon.
 - (3) The proposed project would not physically or visually affect the existing lawn panels in front of Building 77, which lay well outside the project site.
 - (4) All of the aspects of the proposed project, including the pier, the landside improvements, and the parking lot, are low-profile, horizontally-oriented features that would be compatible with the open qualities of the Operations Area. Important view corridors, particularly the view across Seaplane Lagoon north toward the seaplane hangars and west toward San Francisco, would be retained and enhanced by removing existing fencing and increasing pedestrian and bicyclist access to the east side of the lagoon.

Views/Vistas:

1. Retain and preserve views:
 - a. Along Monarch Street and the west side of the Landplane Hangars
 - b. Along Tower Avenue and along the south side of the Seaplane Hangars
 - c. Southward to Seaplane Lagoon and piers.
 - d. Westerly across Airfield
- (1) The proposed project would not affect any of these view corridors because it would be located at the east edge of Seaplane Lagoon and mostly outside the eastern boundary of the NAS Alameda Historic District. The small-scale, low-profile pier, which will be the only part of the

project introduced into Seaplane Lagoon, would not obstruct any of the view corridors described above.

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.

- Most portions of the landside improvements and the parking lot included in the proposed project would match the existing grade. Some areas would have a slight grade change (+/- 3") to improve drainage. In addition, the eastern perimeter of the parking lot would have an earthen swale. Overall, these minimal changes would not affect the low-lying topography, which is a character-defining feature of the Historic District.

Vegetation:

1. Protect and maintain the low ground cover on the south side and southeast corner of Building 77 and surrounding the Control Tower.
 2. Avoid adding foundation planting beds or trees at Building 77 within the open space area created by the setback.
 3. Protect and maintain the low ground cover east of landplane hangars Buildings 20, 21, and 22.
- (1-3) The proposed project would not directly affect any of these areas, which lay well outside the boundaries of the project site.

Circulation:

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

- As discussed previously, all components of the proposed project, including the pier, the landside landscape improvements, and the parking lot, are low-profile, horizontally-oriented features that would be compatible with the open qualities of the Operations Area.

Water Features:

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

- (1) As described earlier, the proposed project includes the construction of a new pier at Seaplane Lagoon. The pier's concrete deck would connect to the land immediately east of the riprap wall, and would not physically affect any Historic District features. The footprint of open water at Seaplane Lagoon, which is one of its character-defining features, would likewise not be affected, because the pier, gangway, and float would all be low-profile structures, with handrails, ramps and platforms that are only as high as required by health and safety codes. Additionally, the pier, gangway and float would occupy an extremely small percentage of the 110-acre area of the lagoon, the rest of which would remain open, with water continuing to flow beneath the new pier and its attendant, portable features, including the gangway and the float.
- (2) All elements of the proposed project, including the new pier, the landside improvements, and the new parking lot area, are compatible with the character-defining features of Seaplane Lagoon. The new pier would be concrete with a simple, utilitarian design in keeping with the lagoon's concrete bulkhead, riprap walls, jetties, and four concrete ramps. The landside improvements, which lay outside the Historic District, are low-profile, horizontally-oriented features that would not visually affect Seaplane Lagoon.

Structures, Furnishings and Objects:

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

- The fixed portion of the new pier is the only permanent structure included in the proposed project. Although the design of the remainder of the proposed project has not been finalized, it includes wood seating, a transit shelter, and trees in movable planter boxes. Although there is no precedent for features like this in the Operations Area of the Historic District, a certain amount of infrastructure is required to make the new ferry terminal functional and enjoyable for its users. The temporary and flexible character of these new elements, as well as their low scale and location outside the Historic District, ensure that Seaplane Lagoon and the rest of NAS Alameda Historic District continues to retain its character.

CEQA Impacts Analysis:

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment."¹¹ Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired."¹² The significance of an historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California

¹¹ CEQA Guidelines subsection 15064.5(b).

¹² CEQA Guidelines subsection 15064.5(b) (1).

Register...as determined by a lead agency for purposes of CEQA.”¹³ Thus, a project may alter a structure that is considered a historical resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the alterations will not materially impair or undermine those physical characteristics the lead agency determines make the structure a historical resource to begin with.

As the analysis on the preceding pages demonstrates, the proposed project for a new ferry terminal, including a new pier, landside improvements, and a parking lot, complies with all 10 Rehabilitation Standards and with the recommendations in *The Guide to Preserving the Character of the Naval Air Station Alameda Historic District*. As a project that complies with the Secretary of the Interior’s Standards, the project appears to benefit from a regulatory presumption that it would have a less-than-significant impact on the NAS Alameda Historic District, and would therefore not have a significant effect on the environment.¹⁴

H. Conclusion

The proposed new ferry terminal at Alameda Point, which includes a new pier, landside improvements, and a parking lot, would be constructed as part of the development plan for Site A, within the Town Center Plan. The proposed project’s location within the boundaries of the NAS Alameda Historic District and adjacent to Seaplane Lagoon necessitated the analysis in this memo. The proposed project’s small scale and low profile massing; its temporary, flexible, and utilitarian design; and its location primarily outside of the Historic District all lead to a conclusion that the project would not have an adverse impact on the character-defining features of Seaplane Lagoon or the NAS Alameda Historic District as a whole. Under CEQA, a project that complies with all ten Rehabilitation Standards is considered to have a less-than-significant effect on the environment.¹⁵ It is my professional opinion that the proposed project would not alter in an adverse manner those characteristics that justify NAS Alameda Historic District’s inclusion in the National Register or the City’s Historic Preservation Inventory.

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

Sincerely,



Christopher VerPlanck

¹³ CEQA Guidelines subsection 15064.5(b) (2).

¹⁴ CEQA Guidelines subsection 15064.5(b) (3).

¹⁵ CEQA Guidelines, Subsection 15064.5(b) (1).