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Memorandum

To:	Andrew Thomas	, Alameda Planning Divis	ion
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- FROM: Michael Corbett
- DATE: 23 June 2017

RE: Peer review of Draft Historic Resource Evaluation of GEDDCO site

PURPOSE

Responding to the request of the City of Alameda Planning Division, the purpose of this memo is to review the *Draft Historic Resource Evaluation: Alameda Marina, 1815 Clement Avenue* (cited below as: *DHRE*), prepared by Christopher VerPlanck, VerPlanck Historic Preservation Consulting, 30 March 2017, and to address the eligibility of historic resources on the property to the California Register of Historic Resources (CRHR).

METHODS

Steps in this review are as follows:

- 1. Review of previous evaluation of this property: Michael Corbett and Mary Hardy, 1988, "General Engineering and Dry Dock Co.", Historic Resources Inventory Form prepared for Alameda Planning Department, 10 June 1988 as part of an Architectural/Historical Survey of Industrial Alameda (General Engineering and Dry Dock Co. cited below as GEDDCO).
- 2. Review of VerPlanck 2017 Draft Historic Resources Evaluation.
- 3. Site visits 14 June 2017 with Allen Tai, Alameda Planning Division (APD) and 20 June 2017.
- 4. See Sanborn maps of 1948 (microfiche at APD), 1948 and 1950 (online from Library of Congress), 1963 (APD), and 1988 (APD).
- 5. Review of guidelines on evaluation of cultural landscapes:

NPS (United States Department of the Interior, National Park Service). 1994. *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes.* Prepared by J. Timothy Keller and Genevieve P. Keller. Washington, D. C.: NPS.

NPS (United States Department of the Interior, National Park Service). 1996. *The Secretary* of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. Edited by Charles A. Birnbaum with Christine Capella Peters.

Washington, D.C: NPS, 1996. Accessed 19 June 2014, http://www2.cr.nps.gov/tps/standards/four-treatments/landscape-guidelines/index.htm.

NPS (United States Department of the Interior, National Park Service). 1999. *National Register Bulletin 30: How to Evaluate and Document Rural Historic Landscapes*. Prepared in 1989 by Linda Flint McClelland, J. Timothy Keller, ASLA, Genevieve P. Keller, and Robert Z. Melnick, ASLA. Revised in 1999. Washington, D.C.: NPS. Accessed 12 June 2014 http://www.cr.nps.gov/nr/publications/bulletins/nrb30/.

- 6. Reference: Betsy Hunter Bradley, 1999, *The Works: The Industrial Architecture of the United States*. New York: Oxford University Press.
- 7. Analysis of site including issues of integrity, interiors, and district boundaries (including East Yard).
- 8. Preparation of memo with findings.

INTRODUCTION

My approach to evaluating the GEDDCO shipyard is different from that of Chris VerPlanck, as explained below. When I first looked at a draft of his report several weeks ago, I thought that although our approaches were different, we arrived at similar conclusions. When I was hired by the City of Alameda to conduct this peer review, I looked again at my 1988 evaluation and looked more deeply at the site itself, and my views changed. Without addressing his report in detail, I am presenting below my current understanding of the property. As I explain, I believe his approach is reasonable and defensible. At the same time, taking a different approach, I have come to different conclusions.

HOW HISTORIC RESOURCES ARE EVALUATED

A quick review of how historic resources are evaluated: resources may be buildings, structures, objects, sites, or districts. As VerPlanck describes in his report (p. 60-65), an evaluation of eligibility to the CRHR is made in relation to four criteria, summarized as 1) history, 2) significant persons, 3) architecture/physical features, and 4) information potential. Resources may be significant in relation to one or more of these criteria.

In making an evaluation, the history and physical character of a resource is addressed in relation to one or more historic contexts. Historic contexts are the larger stories against which the significance of a resource can be understood. VerPlanck cites historic contexts in relation to World War II on "Mobilization and Its Impact" and "Labor and the Working Class in World War II" (from the National Park Service). Among other relevant contexts that have not been addressed in the previous evaluations (Corbett 1988 and VerPlanck 2017) are the industrial development of Alameda's north shore, the shipbuilding process, shipyard technology and facilities, industrial building types, and the organization of labor (building trades, union affiliations, and labor actions).

Resources that are evaluated as having significance in relation to a historic context are assigned a Period of Significance (POS). The POS is a date or range of dates within which the resource appears to have been significant in relation to a historic context. After the POS is established, the resource is assessed for integrity within the POS in relation to the seven aspects of integrity. A resource that possesses significance in relation to a historic context and integrity in relation to the POS is eligible for the CRHR and is a "historic resource" under CEQA.

REVIEW OF GEDDCO EVALUATION

There is no one way to evaluate a complicated historic property like the GEDDCO Shipyard. Variables in an evaluation include the historic contexts considered and a choice between two basic frameworks for how the property is defined, one oriented toward architecture and the other toward cultural landscapes. Evaluations according to each of these two frameworks can produce similar results, but each is based on its own assumptions and can emphasize different qualities in the same resource, producing different results.

Architectural History

The most common approach to evaluating any potential historic resource is through the lens of architectural history. This approach tends to focus on buildings as the primary resources. Collections of buildings with architectural or historic relationships may be identified as comprising a historic district. If the buildings that are the components of a potential historic district have been altered on the exterior, i.e. they don't look the way they did historically, then they have lost integrity and do not contribute to the historic district. If too many have lost integrity then the district as a whole would have lost integrity and would not be eligible for the CRHR.

This is the standard approach that would be used by most reviewers and it is the approach used by VerPlanck in his report. From the architecture/building centered perspective, the conclusions in VerPlanck's report are professional, responsible, valid, and defensible.

In Alameda, a 19th-century residential estate with a house, carriage house, tankhouse, and garden might be seen as a building or work of architecture supported by other features, as a house whose setting included a tankhouse, carriage house, and garden. In such a case, the house is considered to be the primary feature and the tankhouse, carriage house, and garden are secondary. Many properties are defined in this way. A neighborhood of houses with a similar character and similar setbacks from the street such as Victorians or Craftsman Bungalows could be identified as a historic district. In these cases, the primary features are the houses.

VerPlanck emphasizes the importance of the exteriors of the buildings and considers that those buildings that have been altered on the exterior have lost integrity and therefore do not contribute to the historic district. This approach assumes that the exteriors of the buildings are of more importance than other aspects of the buildings. If features other than buildings survive, such as machinery, rail tracks, or engineering structures, they may be recognized as contributing features to a historic district. But if the same features are missing, they may not be noticed in a district focused on buildings.

Cultural Landscapes

Some types of historic resources are best identified and understood as cultural landscapes. A cultural landscape can be understood as another term for a historic district but cultural landscapes are identified by a different process. Cultural landscapes are especially useful tools when resources include a variety of resource types (e.g. buildings, structure, objects, and spaces), when resources are characterized by function as much as by appearance, when the relationships of parts is of primary importance, and when a complex of features is more important than its parts. When it makes sense to consider an entire complex as the unit of evaluation rather than its parts, it is useful to address it as a cultural landscape.

Cultural landscape analysis is most commonly applied to properties with a predominance of vegetation and open space such as parks and farm areas but it is also applied to other types of resources. Cultural landscape analysis works well for understanding, for example, military bases, industrial plants, or any large and complex property. Three recent examples of cultural landscape analysis in the Bay Area for industrial properties are salt ponds in Redwood City, a large foundry in Berkeley (the Macaulay Foundry), and the former General Motors/Nummi Plant (now Tesla) in Fremont.

Cultural landscape analysis is outlined in numerous publications of the National Park Service. The most relevant are *Guidelines for the Treatment of Historic Landscapes* (1992) and, despite its restrictive title, *National Register Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes* (1989). The terminology used in these publications varies somewhat, but all speak to a way of describing and identifying cultural landscapes by seeing both patterns and relationships of development and also the buildings, structures, and other materials of development.

Landscape Characteristics

Cultural landscapes are identified by "landscape characteristics" including topography, vegetation, and natural systems; land uses and activities; patterns of spatial organization and clusters; circulation networks; buildings, structures, and objects; cultural traditions; small-scale objects and furnishings; and boundaries, setting, and views. These characteristics are of greater and lesser importance for different properties. The different characteristics may be combined in different ways in analyzing different properties. For example, vegetation and natural systems would be primary landscape characteristics in a residential subdivision built along a stream with palm trees in front of every house while vegetation would not be applicable at all to a shipyard like GEDDCO. For GEDDCO, the most important landscape characteristics are Patterns of Spatial Organization, Land Uses and Activities, Buildings, and Structures.

The redundancy that is inherent in the identification of landscape characteristics is necessary as the same features are viewed from different perspectives. In addition, this redundancy reinforces a basic idea of a cultural landscape — that the parts are inextricably interrelated.

The GEDDCO shipyard can be advantageously described and understood as a cultural landscape. While a detailed cultural landscape analysis is beyond the scope of this memo, a discussion of the

GEDDCO Shipyard in the language of cultural landscape analysis presents an alternative basis for evaluation.

Boundaries

The GEDDCO Shipyard is considered to consist of both the original shipyard bound by Clement Avenue on the south, Grand Avenue on the West, the U.S. Pierhead Line on the north, and the east border of the East Yard on the east. Although the East Yard was added to GEDDCO in 1945, the last year of the war, it is presumed that like most shipyards and wartime industries in the Bay Area, GEDDCO was at full capacity at that time preparing for the invasion of Japan. Thus, at its peak of production and potential importance, the GEDDCO shipyard included both its original site and the East Yard.

Since it was first built at the beginning of World War II, the boundaries of the GEDDCO Shipyard have changed both in the addition of the East Yard (which took place within the POS) and in the loss of the west end of the main yard (which took place after the POS) for the Bureau of Electricity Service Center. The loss of the west end involved the removal of two small buildings apparently related to electric power, and a rail spur that ran west of Ways No. 4 toward the estuary.

Topography

The GEDDCO Shipyard site is in two parts, land and water. Located on the north shore of Alameda, its inshore section consists of gently sloping flat ground, all or partly built on filled salt marsh and tidelands. Its offshore section is part of the Oakland Estuary. It was built with an irregular shoreline that generally did not extend as far as the "U.S. Bulkhead Line" established by the Army Corps of Engineers as the outer limit for a seawall.

The land section of the site is a flat area that slopes gently toward the estuary from an elevation of approximately 12 feet along Clement Avenue to about 5 feet at the water's edge (visual estimate from USGS Quad map). As the shipyard was built, the four shipways and the two marine railways sloped somewhat more steeply down to the water. These lower areas have been filled (or simply covered?) and leveled.

The water of the estuary fluctuates with the tides, over a typical range of about 6.4 feet. As it was built, four docks or piers projected north from the water's edge across the Bulkhead Line another 200 feet to the "U.S. Pierhead Line", the limit of any pier or other projection established by the Army Corps of Engineers. In reverse, there were incursions inside the Bulkhead Line of the estuary in the forebays of the two marine railways, in the area of the floating dry dock, and in the graving dock.

Patterns of Spatial Organization

The first considerations in the original layout of the shipyard were the process of building ships and the constraints on that process presented by links to transportation and other infrastructure. The site was chosen for a shipyard because it occupied flat land on navigable water because it was served by rail and water transportation and because it was served by infrastructure of power, water, and gas. In addition, there was a labor force available. Its design was governed by considerations of cost and efficiency of operation.

Generally speaking, as it was built there were three functions in the shipyard: interchange with the outside world, the manufacturing of parts, and the assembly of ships. Each of these had its own area and its own building types.

- 1. *Interchange with the outside world.* Workers and materials arrived by foot, motor vehicle, or rail on Clement Avenue. Thus, warehouses and storage buildings were located along Clement to receive materials. Office buildings were located along Clement for administrative and clerical workers who may not have needed to proceed further into the yard (where their office clothes would be soiled by machinery and heavy work). The mixture of buildings along Clement formed a wall that provided safety to the public and security to the shipyard.
- 2. *Manufacturing of parts*. Large manufacturing buildings were located at right angles to the street, generally near warehouses on the street that stored related materials. One example is the location of the pipe warehouse on a site now occupied by Building No. 36 near the pipe shop. The right-angled orientation of the manufacturing buildings preserved access to the water for movement of materials, labor, and products.
- 3. Assembly of ships. In another type of factory, the assembly of parts would take place indoors in a production shed or erecting shop. In a shipyard, the assembly phase generally takes place outside. Parts from all of the manufacturing buildings were brought to the ways, marine railways, floating dry dock, and graving dock for assembly of new ships and repair of existing ships. When the dry land work was done, the ships were moved into the water along the docks for finish work and testing.

In addition, support functions were scattered throughout the site and nuisance functions (noise, dust, smells, smoke, susceptibility to fire, etc.), like trash handling, fuel storage, power facilities, and paint storage, were often in separate buildings.

Virtually any shipyard of the era could be described as having the same spatial relationships. Shipyards with more or fewer buildings and shipyards that looked different could nevertheless be described in the same general terms. These spatial relationships are central to understanding GEDDCO.

Land Uses and Activities

While in general terms it is easy to say that the land use of the GEDDCO shipyard is the building of ships, a cultural landscape analysis looks deeper. Such an analysis would locate specific activities in particular places in the yard or perhaps in a sequence of places as part of a process. Identification of activities is associated with trade or union job titles. The picture this would present can be suggested by general observations, that, for example, Building No. 16 (office building) would be occupied by workers like managers, clerks, accountants, and engineers; Building No. 23 (welding shop) had welders; Building No. 19 (machine shop and riggers loft) had machinists in its main space and riggers in its long rigging loft; Building No. 10 (joiners shop) had carpenters and joiners; Building No. 18 (blacksmith shop) had blacksmiths; Building 28 (office and warehouse, mold loft, electrical shop) had clerks and warehouse workers on the first floor, mold makers in the second floor mold loft, and electricians in the electrical shop. The components of ships made in the various shops would have been assembled at the ways, marine

railways, dry dock, and graving dock by other workers. Moving in and around the yard would be cart drivers, truck drivers, messengers, and others. A closer look at each building would bring out more detail that would correlate with the design of buildings.

Land uses and Activities are particularly closely associated with Patterns of Spatial Organization, with Circulation, and with the industrial process.

Buildings

The most conspicuous features of the shipyard are its buildings and structures. Together with its location on the waterfront and it's still evident rail connections, these constitute a recognizable type — a shipyard. Shipyards are generally made up of the same elements, but these elements may be arranged differently.

The first way buildings in an industrial landscape must be treated is as representatives of building types: how were they designed to accommodate their functions? Mold lofts and pattern lofts, for example, require column-free spaces and lots of natural light. Typically they are built on upper level floors under trusses that provide column-free spaces. A warehouse might have lots of columns and need little light. A shop typically has a column-free main bay with a crane spanning the space to move heavy materials.

The buildings of the GEDDCO shipyard represent several of the basic types characteristic of large manufacturing plants: lofts, shops of various types (machine shop, flange shop, plate shop, pipe shop, sheet metal shop), and warehouses. (A larger shipyard might also have had a power plant and a foundry; a smaller shipyard might have had fewer shops). All of these are variations on types characterized by cheap, durable construction and materials, natural light and ventilation, the use of trusses for column-free spaces, and cladding in corrugated metal and glass. The guiding principles in the design of these buildings are utility, cost, efficiency, and flexibility.

Only after the functional and cost considerations were met was any thought given to the appearance of the buildings. All but a few are clad in utilitarian materials, mostly corrugated metal and glass, without any ornamentation. Most exceptions to this (Buildings No. 6, 16, 21, and 27), which are clad in stucco, are also treated with a minimal suggestion of the Moderne Style. Some of these are built along Clement Avenue where they provide a gesture of formality to the city. More importantly, in the context of the whole plant, they reflect a white collar–blue collar hierarchy. Individual white collar managers and office workers occupied separate offices denoted by separate windows in buildings with a finished architectural appearance, while individual blue collar workers occupied large unfinished structures whose windows provided light to large communal interiors rather than individual spaces, reflecting their status as like interchangeable parts in a factory process.

Another exception, Building No. 19, the Machine Shop, designed by architect Alben Froberg, was not ornamented. However, its intentional composition of the standard materials (corrugated metal and glass), expressed the importance of this building within the shipyard and, more generally, the power of American shipbuilding during the war.

One building that tells an important part of the story is Building No. 31 which provided housing at a time when housing for industrial workers was critically short. Housing at industrial plants has been provided intermittently since the early days of the industrial revolution and was the most direct way of addressing an essential problem. Building No. 31 has been converted from housing to offices, but its basic plan consisting of central corridors with room on either side appears to be intact. Also, the application of aluminum siding to the exterior covered up the original v-groove rustic siding and did not involve removal of that siding.

In addressing buildings as part of a cultural landscape, in particular, interiors are essential parts of the story. Interiors reveal information about structural systems and materials, about technology, about how buildings were used and therefore about the relationships of buildings to larger landscapes, and about why exteriors look the way they do.

<u>Structures</u>

Structures were essential parts of the operation of the shipyard, including the rail lines, outdoor traveling cranes, the seawall, docks, paved parking and staging areas, and the ship assembly areas (the ways, marine railroads, the dry dock, and the graving dock). Many of these key features have been removed.

Circulation Networks

Related to every other category but particularly to spatial organization and land uses are circulation networks, both inside the plant and as it connected to outside systems. First of all, a shipyard must connect externally to the rail network, city streets, and navigable water for movement of people and goods. At GEDDCO, principal access was on Clement Avenue for motor vehicles. The Alameda Belt Line (ABL) ran on Clement Avenue and connected to the Southern Pacific.

Internally, there were rail spurs from the ABL; parking areas for workers, trucks, and visitors; and pathways of circulation around buildings and structures across large areas of paved ground. Rail spurs ran to the west end of the yard adjacent to the ways, to the center of the yard and out Dock No. 4 with a siding, to the dry dock at the east end of the original yard, and to the graving dock in the East Yard. Much of the east and west spurs are still in place.

The ways, marine railways, dry dock, and graving dock were points of interchange between land and water. Ships were built on the ways and returned to the estuary, were hauled up by the marine railways and repaired, and were repaired in the dry dock and the graving dock.

Small Scale Objects

Some features of a cultural landscape may be small but they make an important contribution to the authentic representation and feel of a place. In any industrial landscape, typical small-scale objects are signs, usually with safety and labor regulations, like procedures to follow for operating a machine or simply, "No smoking". Fire safety features including hydrants are small scale objects of an industrial landscape. In a waterfront landscape, small objects include mooring bitts and mooring cleats for tying up ships. Mooring bitts and mooring cleats survive at GEDDCO but most or all have been moved from their original locations and they now serve only ornamental or commemorative purposes.

Setting and Views

The setting and its associated views have not substantially changed. To the south is a residential neighborhood of working class houses and small industrial and commercial buildings along Clement Avenue. To the north, the view is still across the estuary with the Oakland hills in the distance.

Cultural Traditions

As a category, "cultural tradition" may sound like it applies to folklife — and it does — but in the case of a large industrial site it also applies to the manufacturing and assembly process. Ideas about how to build ships are based on technology and rational planning, but they are also in part theories that may go in and out of fashion. They change with new information, new technologies, new labor practices, and new management.

The assembly processes employed here are only generally known at this point. Cultural traditions can't be identified in material form but they have a powerful influence on material forms, i.e., physical facilities like the GEDDCO Shipyard. Identifying these traditions is fundamental to understanding the plant.

EVALUATION

Caveats

The following evaluation is based on incomplete information which is typical of historic resource evaluations largely due to inadequate funding. To gather the ideal level of information would be a large, time-consuming, and expensive job. Nevertheless, it is important to recognize what is missing and that with more information, better grounded and more authoritative evaluations can be made. There is incomplete knowledge of the interiors of the buildings. The history of the shipyard, its labor force, its processes, and its products is incomplete. Historic contexts are lacking on shipbuilding processes, technology, and facilities; on the industrial development of Alameda's north shore; and on industrial labor in Alameda.

Significance

The GEDDCO Shipyard appears significant under Criteria 1(history) and 3 (architecture) of the CRHR. It possesses significance as a whole complex which can be described as a cultural landscape or as a historic district. It possesses significance under both criteria for many reasons.

As a cultural landscape, its components are all of its features from the time of its operation around World War II. These include land oriented features (buildings, rail lines, paved areas, etc.) and water oriented features (seawall, traveling cranes, docks, ways, marine railways, dry dock, graving dock, etc.).

Under Criterion 1, GEDDCO is significant in the industrial development of Alameda. Among several wartime shipyards, it is probably the most complete survivor (based on a quick drive-by and google earth). Its history is associated not only with the war effort but with the economy and demographics of Alameda. In relation to the war, because of the importance of what it produced,

it has been identified as "one of the ten most important Bay Area shipyards". (VerPlanck p. 61) With more information, no doubt more areas of significance could be identified.

Under Criterion 3, GEDDCO is significant as a representative of a complete mid-size shipyard of its era. As built, it consisted of land and water-related resources in a large functional complex.

Period of Significance (POS)

The POS is from 1938 when the wartime build-up began to 1948 when GEDDCO closed.

Integrity

The assessment of integrity of GEDDCO is complicated and is presented here in steps from the largest perspective to a more detailed perspective.

While the shipyard possesses significance in several areas, it also suffers from losses of integrity in many ways. Most of all, it has lost integrity as a shipyard because of the loss of almost all of its water-oriented features, described above in the section on Patterns of Spatial Organization as associated with *Assembly of Ships*. This represents a loss of one of three principle functions of the shipyard and roughly half of the material features of the shipyard.

After the water oriented features are gone, however, a substantial amount of physical fabric remains. At the most general level, two of the three principal functions of the shipyard remain, namely those parts associated with *Interchange with the Outside World* and *Manufacturing of Parts*. The surviving features occupy roughly half of the area of the complete shipyard.

With the loss of the *Assembly of Ships* function in the loss of those parts of the property where ships were assembled and repaired, it is no longer accurate to call what remains a shipyard. What remains is a portion of the GEDDCO shipyard. With the substantial survival of the *Interchange* and *Manufacturing* facilities, that which remains represents the manufacturing of parts of ships rather than entire ships. Some shipbuilding sites such as the land-locked site of Pacific Bridge Co. No. 2 (demolished) made parts for the assembly of ships elsewhere. Indeed, a great many manufacturing plants in separate locations in Oakland, Berkeley, Emeryville, and Richmond made parts for the major shipyards around the bay.

If the property no longer possesses integrity as a shipyard, it still retains a nearly complete inventory of warehouse, offices, and shop buildings associated with the *Interchange* and *Manufacturing* functions of GEDDCO. It is still associated with a shipyard as a meaningful complex of buildings and structures (a shopyard?). The complex that remains retains integrity in relation to most of its landscape characteristics, notably Patterns of Spatial Organization, Land Uses and Activities, Circulation Networks, Topography, and Setting and Views.

In one other important way, it has lost integrity as a shipyard. With the losses in particular of the shipways and associated traveling cranes, and the marine railways and associated hauling machinery systems, it has lost integrity for its significant representation of the technology of a shipyard. The National Park Service has recognized historic shipyards that embody the shipbuilding technology of their time when they have retained these features.

With regard to other individual components – Buildings and Small Scale Objects – the issue of integrity is not as clear cut. As mentioned above, surviving Small Scale Objects such as mooring bitts and mooring cleats appear to have been moved and are clearly used today for commemorative or ornamental purposes. These have lost integrity and are not contributors, but they are also minor features in the context of the whole so do not constitute a significant loss to the integrity of the whole district.

Most of the buildings of GEDDCO have been altered in some obvious way including new exterior siding, subdivided interiors, and refinished interiors or in some combination of these. In assessing the integrity of altered buildings, what is the threshold between a contributor and a non-contributor? For the purposes of this evaluation, I propose the following standards:

- 1. A building whose exterior has been reclad or replaced since the POS is a contributor to the historic district/cultural landscape if its interior is substantially intact, i.e. if some combination of the spaces, structure, and finishes conveys the character and use of the building during the POS.
- 2. A building whose exterior has been reclad and whose interior spaces, structure, and finishes no longer convey the character and use of the building during the POS is not a contributor
- 3. A building whose exterior walls are intact but covered over with a later cladding is a contributor
- 4. A building with additions or appendages (e.g. stairs, decks, etc.) which have been altered is still a contributor if the main building meets the standard given here for a contributor.

These standards are based on the principles of a cultural landscape which, in this case, gives Patterns of Spatial Organization and Land Uses and Activities an equally high value with Buildings. As for Buildings themselves, as above, this cultural landscape is one in which the concern of the designers of the shipyard was first of all to produce a functional complex of buildings, structures, etc. The exterior appearance of the buildings was entirely a matter of what was cheap, available, functional, and durable. This is not to say that the loss of exterior materials is unimportant, but that it is less important than in situations where the appearance of buildings has a different role.

Overall, the GEDDCO shipyard has lost integrity and the GEDDCO Shop Yard retains integrity, as detailed below.

STATUS AS A HISTORIC RESOURCE

The GEDDCO Shipyard is significant in relation to Criteria 1 and 3 of the CRHR for the Period of Significance 1938-1948. For its POS, a substantial portion of the shipyard, the Shop Yard, retains integrity. Thus the Shop Yard is eligible as a historic district/cultural landscape for the CRHR. The boundaries of the district are the combined properties of the original site (minus the west end which was sold to the Bureau of Electricity) and the East Yard, running from Clement Avenue to the Bulkhead Line.

Contributing features to the district are as follows:

Building No. 1

Building No. 3

Building No. 4

Building No. 6

Building No. 7

Building No. 10

Building No. 12

Building No. 14

Building No. 15

Building No. 17

Building No. 19

Building No. 21

Building No. 22

Building No. 27

Building No. 28

Building No. 29

Building No. 31

Building No. 32

Building No. 33

Building No. 34

Paved open space of yard

Remnants of rail spurs

Graving dock



••••• Rail Spurs

Cultural Landscape Boundary

General Engineering and Dry Dock Cultural Landscape Source adapted from VerPlanck 2017