

**AAPS Position Statement
Regarding the
“Alameda Point Revitalization Initiative”**

The Alameda Architectural Preservation Society’s Board of Directors opposes the Alameda Point Revitalization Initiative.

Alameda’s own former Naval Air Station is key in connecting Alameda’s past to its present and future. During World War II, Alameda Naval Air Station (NAS) was the most important new air station constructed on the west coast. It was a significant part of the Navy’s Pacific operations and was the launching point for Doolittle’s Raiders. In 1992, the State Historic Preservation Officer (SHPO) determined the NAS Historic District to be eligible for listing in the National Register of Historic Places; the district contains 85 buildings that contribute to the significance of the site. The historic district is significant for its history and for its architecture, with a cohesive site plan, landscape, and Moderne architectural designs. Alameda is honored to contain a historic district tied to events of national historical significance. The district is Alameda’s tangible link to World War II and demands every reasonable preservation effort. The City of Alameda also has designated the NAS Historic District a City Monument.

The Board of Directors of the Alameda Architectural Preservation Society (AAPS) has carefully reviewed the Initiative, which would, among other things, exempt Alameda Point from the provisions of “Measure A”. Authored by SunCal Companies, the Initiative contains the definitive “Alameda Point Specific Plan” which will govern development at Alameda Point for the next 25 years. AAPS has also reviewed additional public documents related to the Initiative such as the City of Alameda’s Executive Summary of the ballot Initiative.

AAPS has repeatedly requested access to studies completed by SunCal, which evaluate potential adaptive reuse plans for historic buildings at Alameda Point and evaluate the cost of preserving those buildings. Access to these studies is important in order to independently assess SunCal’s conclusions with respect to the economic feasibility of rehabilitating Alameda Point’s historic resources. SunCal has declined to provide AAPS access to these studies.

There are numerous examples of insufficient information within the Initiative, inconsistencies between selected Initiative provisions, and conflicts between provisions in the Initiative that would inappropriately supersede the existing City of Alameda Municipal Code. It should be noted that the City of Alameda’s own Executive Summary, dated 29 May 2009, also voices concern regarding lack of information presented by SunCal.

Some specific AAPS concerns are set forth as follows:

A. AAPS Concerns Regarding Issues as Defined in the Initiative:

1. The Initiative circumvents the established city procedures for reviewing proposed alterations to historic structures. In the Initiative, the Planning Director would have sole authority to determine whether alterations to Historic District contributors are in “substantial conformance” with the Alameda General Plan, the Initiative’s Specific Plan and the Initiative’s Historic Resources Design Guidelines with no input from the Historical Advisory Board (HAB) or the public and with no opportunity to appeal. Under the Alameda Municipal Code, the HAB must approve alterations to Historic Monuments such as the NAS Historic District.
2. The Historic District’s physical boundaries would be significantly reduced in size from those set forth in the 1992 Historic Architectural Resources Inventory by Sally Woodbridge.
3. Historic structures outside the “Preservation Mixed Use” boundaries defined in the Initiative’s Specific Plan are subject to the Developer’s unilateral demolition by right without any input from the City of Alameda or its residents. Several historic resources, including the Flight Control Tower, WAVES barracks, Seaplane Hangers and Air Terminal are at risk and must be given greater protection.
4. Many historic structures will fall outside the Initiative’s new Historic District boundary. It is not clear the re-defined historic district would continue to be eligible for the National Register of Historic Places, either now or in 25 years at the culmination of the project. Within the designated 25 year time frame described in the Initiative, buildings will be added, removed or altered which could affect the District’s historical designation. If enough buildings contributing to the Historic District are demolished or altered, the remaining buildings might no longer qualify for the 20% federal tax credit for improvements to historic buildings. This could make rehabilitating those buildings economically unfeasible.

B. AAPS Concerns Regarding Issues Unresolved by the Initiative:

1. The Initiative, as proposed by SunCal, would supersede the findings of other studies such as an Environmental Impact Report or other environmental documents, thereby weakening protection for historic structures.
2. Development is projected to occur over a period of years. SunCal could elect to keep its entitlement inactive over a period of up to 25 years. Lack

of maintenance and security could result in neglect and degradation of historic buildings beyond the possibility of preservation and disqualify the Historic District from the eligibility for the National Register. The Initiative makes no provision for, or assurance of the continued maintenance, security, or preservation of historic structures not involved in an early development phase.

3. Buildings that are currently not considered Historic District contributors, such as the Flight Control Tower, may not be included in an early phase of development. The Initiative does not assure these buildings will be protected from demolition while they await conversion to new uses.
4. The provisions of the Initiative allow higher levels of density, lax demolition controls and an approval process without necessary checks and balances.
5. SunCal proposes to write its own Historic Resources Design Guidelines (HRDG) and it is unclear if the Guidelines would include Standards set by the Secretary of the Interior. The proposed approval processes for alteration or demolition of historic resources, as included in the Initiative, are often too broad, easily subject to abuse and the boundaries of the Preservation Mixed Use area are not shown consistently within their own Specific Plan.

Given the uncertainties, inconsistencies and lack of information from SunCal Companies as stated above, the AAPS Board is not able to support the "Alameda Point Revitalization Initiative". We are concerned that the Initiative would result in the unnecessary destruction or alteration of significant historic resources.