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Project Address:	**Treasure Island**
Block/Lot:	N/A
Case No.:	**2007.0903E**
Date of Review:	May 28, 2010
Planning Dept. Reviewer:	Sophie Hayward
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PROPOSED PROJECT ☐ Demolition ☒ Alteration

PROJECT DESCRIPTION

The Treasure Island Development Authority ("TIDA") is proposing a Redevelopment Plan for Treasure Island and Yerba Buena Island ("Redevelopment Plan," also referred to in this report as the Proposed Project) that would provide the basis for redevelopment of most of the Naval Station Treasure Island lands (the "Project Area") from a former military base consisting of primarily low-density residential uses with vacant and underutilized non-residential structures to a new, high-density, mixed-use community with a variety of housing types, a retail core, a variety of open space and recreation opportunities, on-site infrastructure, and public and community facilities and services. The Redevelopment Plan, and a Design for Development adopted in connection with the Redevelopment Plan, would establish the land use controls and design standards for the project site.

Existing interim uses within the Project Area include approximately 1,000 dwelling units, 100 buildings with existing and former non-residential uses, parking and roadways, open space, a wastewater treatment facility, and other infrastructure. The Proposed Project would replace those existing uses with uses and structures including:

- Approximately 8,000 residential units;
- Approximately 140,000 sq. ft. of new commercial and retail space;
- Approximately 100,000 sq. ft. of new office space;
- Adaptive reuse of historic Buildings 1, 2, and 3 with up to 311,000 sq. ft. of commercial space;
- Approximately 500 hotel rooms;
- Approximately 300 acres of parks and open space uses;
- Bicycle, transit, and pedestrian facilities;
- A ferry quay/intermodal Transit Hub;
- New and upgraded public services and utilities, including a new wastewater treatment plant.

Other components of the Proposed Project include supplemental environmental remediation of sites containing hazardous materials to support the proposed uses and geotechnical improvements to stabilize Treasure Island and the causeway that connects it to Yerba Buena Island. Initial build-out under the Proposed Project would be implemented in four phases, anticipated to occur from approximately 2011 through 2031, depending on market conditions.

All of the buildings, structures, objects and landscapes across most of the 403-acre Treasure Island site are to be demolished with the exception of Buildings 1, 2 and 3. In addition to Buildings 1, 2, and 3, the complex of seven Job Corps buildings and their surrounding landscape located 37 acres in the southwestern quadrant of the island (outside of the Project Area) will remain in place as property of the U.S. Department of Labor.

PRE-EXISTING HISTORIC RATING / SURVEY

As noted in the submitted Historic Resource Evaluation (HRE), Treasure Island was the site created for the Golden Gate International Exposition, held from 1939-1940.[1] The island was originally created by dredging the San Francisco Bay, which began in 1936.

Information included in the submitted HRE notes that Treasure Island is California Historic Resource Number 987, listed in 1989. Treasure Island is also a designated State Historic Landmark. The Administration Building, the Hall of Transportation, and the Palace of Fine and Decorative Arts (referred to throughout this report as Buildings 1, 2, and 3) are each individually designated State Historic Landmarks.

Buildings 1, 2, and 3 are also individually listed on the National Register of Historic Places.

The scope of the submitted HRE was to evaluate seventeen potential historic resources that have not previously been evaluated, as well as to evaluate potential impacts of the proposed project on known and potential historic resources.[2] The seventeen sites were evaluated because although none has been included on any previously adopted historic surveys and none has been included on the National or the California Registers, each has a recorded date of construction or development that makes it a "Category B" building for the purposes of CEQA review by the Planning Department.[3]

Of the potential resources evaluated in the submitted HRE, two were found to be eligible for the California Register, and therefore considered historic resources for the purposes of CEQA:

- The object within the Damage Control Trainer building known as the *USS Buttercup*;
- A portion of the landscape features that surround Buildings 1, 2, and 3.

HISTORIC DISTRICT / NEIGHBORHOOD CONTEXT

The Proposed Project is located on Treasure Island, located within the San Francisco Bay. Treasure Island is characterized by three distinct periods of development:

- The Island's formation through dredging and its use as a venue for the Golden Gate International Exposition of 1939 (1936-1940);

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[1] "Historic Resource Evaluation Report: Treasure Island, San Francisco, California: Buildings, Structures, and Objects Built Between 1947-1960 and Landscape Features from 1939-1940 (DRAFT 3)," (April 20, 2010), prepared by Knapp Architects for Turnstone Consulting. Available by request at the San Francisco Planning Department (1650 Mission Street, Suite 400, San Francisco, CA 94103) in the Case Docket for Case No. 2007.0903E. The document is referred to as the "Treasure Island HRE."

[2] Ibid, Page 9.

[3] Please see "Preservation Bulletin #16," available online at: http://www.sfgov.org/site/uploadedfiles/planning/projects_reports/PresBulletin16CEQA10_8_04.PDF (November 2, 2007)

- The use of Treasure Island by the Navy as a strategic site for 'protection of navigation and commerce' during World War Two (1941-1946);
- The development of specialized technical training centers by the Navy on Treasure Island during the Cold War (1947-1997).

The Navy closed the base operationally in 1997, and since that time the base has been leased to the Treasure Island Development authority, and is characterized by multi-purpose temporary uses including residential units, homeless programs, rental event spaces, fabrication spaces, and recreational open space.

1. **California Register Criteria of Significance: Note,** a building may be an historical resource if it meets any of the California Register criteria listed below. If more information is needed to make such a determination please specify what information is needed. *(This determination for California Register Eligibility is made based on existing data and research provided to the Planning Department by the above named preparer / consultant and other parties. Key pages of report and a photograph of the subject building are attached.)*

Event: or	☒ Yes	☐ No	☐ Unable to determine
Persons: or	☐ Yes	☐ No	☐ Unable to determine
Architecture: or	☒ Yes	☐ No	☐ Unable to determine
Information Potential:	☐ Further investigation recommended.		
District or Context:	☐ Yes, may contribute to a potential district or significant context		

If Yes; Period of significance:

Notes: The Project Sponsor submitted an HRE prepared by Knapp Architects in which seventeen potential resources are evaluated to determine whether they are eligible for inclusion on the California Register, and therefore considered resources for the purposes of CEQA. Staff concurs with the findings in the submitted report regarding the eligibility of each of the seventeen evaluated sites. The sites evaluated in the submitted report include:

- The USS Buttercup;
- Landscape features that surround Buildings 1, 2, and 3;
- The Damage Control Building in which the USS Buttercup is located;
- Two separate Naval Technical Training Center (NTTC) RADIAC Instruction buildings;
- The Radium and Radiac Vault;
- A Gun Mount;
- A Paint and Hazmat Locker;
- The Baseball Storage Facility and Tennis Courts;
- A Sump House;
- A Radio Tower;
- Two separate storage areas;
- The Avenue of the Palms;
- Olive Trees.

Below is a summary of the evaluations of each of the potential resources evaluated against three of the four criteria for listing on the California Register. The scope of the submitted HRE did not

include an evaluation for eligibility under Criterion 4, which is, as noted in the submitted HRE, "commonly understood to apply primarily to archaeological resources."[4]

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

As noted in the submitted HRE, Buildings 1, 2, and 3 are individually listed on the National Register under Criterion A, for their association with the Golden Gate International Exposition (GGIE), and are also listed as under National Register Criterion C for their Art Moderne architectural style. The National Register nomination form for Buildings 1, 2, and 3 did not include an evaluation of the landscape that surrounds the three adjacent resources. The submitted HRE includes an evaluation of the landscape elements that surround Buildings 1,2, and 3, and finds that the landscape contributes to the significance of the buildings under California Register Criterion 1, for their association with the GGIE:

> The review of additional historical sources[...]that were not included in the NRHP nomination has provided a more detailed description of the landscape zone (ie, the location of lawns or planted areas, the types of vegetation features, and the location of the hardscape features) associated with [Buildings 1, 2, and 3] during the GGIE. This review has shown that there remains a distinct landscape zone around the building[s] that contributes to the significance[...]under CRHR Criterion 1 (in association with GGIE). This remaining landscape zone still conveys the spatial organization that existed around the building[s] during the GGIE. Additionally, this landscape zone continues to function as a landscape setting[...]in the same way (functionally) as it did during the GGIE.[5]

The specific landscape features that contribute to the significance of Buildings 1, 2, and 3 are listed in the submitted HRE, and Staff concurs with the evaluation.[6] Please also note that the HRE identifies extant landscape features that do not contribute to the significance of each of the three buildings. Staff also concurs with this evaluation.[7]

Specific portions of the landscape that surrounds Buildings 1, 2, and 3 appear to be eligible for listing on the California Register under Criterion 1; no other potential historic resource evaluated in submitted report appears to be eligible under Criterion 1.

Criterion 2: It is associated with the lives of persons important in our local, regional, or national past;

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[4] HRE, Page 27.
[5] Ibid, Page 85.
[6] Ibid, Pages 83, 91-92, and 97.
[7] Ibid, Pages 84, 92, and 97.

It does not appear that evaluated sites are associated with persons significant to our local, regional, or national past. No information submitted to the Department suggests that significant persons are associated with the evaluated sites, and therefore, none of the seventeen evaluated sites appears to be eligible for listing on the California Register under Criterion 2.

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;

The Damage Control Trainer, a building in which an object known as the USS Buttercup – a battleship simulator – is located, was constructed in approximately 1951. The Damage Control Trainer sits on an exposed concrete foundation on a site surrounded by asphalt. The building is rectangular with an axis that runs north-south. The one-story building has a gabled roof and is clad in galvanized sheet metal. The building, a pre-fabricated structure designed by the Butler Manufacturing Company, does not appear to embody the distinctive characteristics of a type, period, region, or method of construction, nor does it represent the work of a master architect. As noted in the HRE, "Butler's products have been used since 1901 and this example was a commonly used storage or manufacturing building for civilian or military purposes in the latter 20th Century."[8] It does not appear that the building itself is eligible for the California Register under Criterion 3.

However, the object that is the USS Buttercup, the battleship simulator, located within the Damage Control Trainer building, appears to be eligible for the California Register under Criterion 3. The battleship simulator duplicates a portion of a ship's exterior deck and interior compartments and was capable of being flooded with water and blown with wind to simulate the effects of battle damage on the high seas. As noted in the submitted HRE, the "USS Buttercup is a rare and distinctive object, exhibiting specialized design and construction for military training, which is an important aspect of military history. Because this object is one of a handful in the United States, it is significant at the state level under Criterion 3." Staff concurs with this evaluation.

Among the potential historic resources evaluated in the submitted HRE, only the *USS Buttercup* appears eligible under Criterion 3.

Criterion 4: It yields, or may be likely to yield, information important in prehistory or history;

As noted above, the scope of the submitted HRE did not include an evaluation of significance under Criterion 4.

2. **Integrity** is the ability of a property to convey its significance. To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register criteria, but it also must have integrity. To retain historic integrity a property will always possess several, and

[8] Ibid, Page 32.

usually most, of the aspects. The subject property has retained or lacks integrity from the period of significance noted above:

Location:	☐ Retains	☐ Lacks	**Setting:**	☐ Retains	☐ Lacks
Association:	☐ Retains	☐ Lacks	**Feeling:**	☐ Retains	☐ Lacks
Design:	☐ Retains	☐ Lacks	**Materials:**	☐ Retains	☐ Lacks
Workmanship:	☐ Retains	☐ Lacks			

Notes: Evaluation of integrity is only applicable to those evaluated sites that have been shown to be significant under California Register criteria. Therefore, the evaluation of integrity in the submitted HRE focused on the *USS Buttercup* battleship simulator, and the landscape that surrounds Buildings 1, 2, and 3.

Staff concurs with the findings of the submitted HRE, that the USS Buttercup battleship simulator retains sufficient integrity to express its historic significance.[9]

Staff also concurs with the findings that the following landscape features retain sufficient integrity to aid in expressing the historic significance of Buildings 1, 2, and 3, as they relate to the GGIE:

Building 1
The following seven landscape components retain sufficient integrity to aid in the expression of Building 1's historic significance associated with the GGIE:

- The entrance drive and adjacent sidewalks that parallel the U-shape of the building;
- The two concrete retaining walls, on either side of the building, that extend from the edge of the building to the Avenue of Palms;
- Two secondary entrance roads into the basement of the building;
- The location of the landscape bed across the front of the entrance, created by the Avenue of Palms, the entrance drive to the building, and a wall;
- The location of the landscape bed located along the inside edge of the drives into the basement;
- The location of lawns at the outer edges of the building;
- The palms that extend in a row across the front edge of the landscape (these trees are part of the Avenue of Palms street tree planting).

Other extant trees, shrubs, and groundcovers have all been added by the Navy after the period associated with the GGIE and are not considered contributing landscape features.

Building 2:
The following six landscape features retain sufficient integrity to aid in the expression of Building 2's historic significance in association with the GGIE:
West side

- The location of the lawn between the building and Avenue D that provides a landscape setting in front of the west side of the building. (Note: A portion of the lawn along the outer/west edge has been removed and paved);

[9] Ibid, Page 31.

- The remaining nine original olive trees that define the outer edge of the landscape zone on the west side of Building 2. (note that three of the original 12 trees are missing in this row);
- The location of the concrete sidewalk that leads to entrance door. (Note: The split portion of the concrete sidewalk was added by the Navy and is not a contributing feature.)

North side

- The location of the lawn between the building and the edge of the California Street sidewalk;
- The location of the sidewalk leading to the entrance to the building;
- The remaining nine original olive trees that define the outer edge of the landscape zone in front of the building. (Note: Two of the original 11 trees are missing in this row.)

Building 3:

The narrow strip of ground between Building 3 and California Avenue is the only portion of the original landscape zone around Building 3 that remains from the period of significance associated with the GGIE. Only the grass retains sufficient integrity to express aid in expressing the building's historic significance associated with the GGIE.

The Department concurs with the findings in the submitted HRE.

3. **Determination** Whether **the property is an "historical resource" for purposes of CEQA**

☐ No Resource Present (*Go to 6. below*) ☒ Historical Resource Present (*Continue to 4.*)

4. **If the property appears to be an historical resource, whether the proposed project would materially impair the resource (i.e. alter in an adverse manner those physical characteristics which justify the property's inclusion in any registry to which it belongs).**

☐ The project will not cause a substantial adverse change in the significance of the resource such that the significance of the resource would be materially impaired. *(Continue to 5 if the project is an alteration.)*

☒ The project is a significant impact as proposed. *(Continue to 5 if the project is an alteration.)*

Note: Staff has determined that a portion of the Proposed Project will have a significant impact; specifically, the proposed demolition of the USS Buttercup Battleship simulator will have a significant impact.

Staff concurs with a portion of the submitted HRE regarding the impacts of the proposed project on identified historic resources. Staff does not concur with all of the findings in the submitted HRE, as described below; specifically, Staff does not concur with the findings of the submitted HRE regarding Building 111, which is attached to Building 3.

Staff **concurs** with the finding that the proposed project will have a significant and unavoidable impact on the USS Buttercup battleship simulator. The proposed project calls for the demolition of the *USS Buttercup*; as such, its character-defining materials and features would be removed entirely and it could no longer convey historic significance.

Staff **concurs** with the finding that the proposed rehabilitation of Buildings 1, 2, and 3 will not have a significant impact on the resources, as the project's Design for Development requires that the buildings be rehabilitated in a manner consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, specifically, the *Standards for Rehabilitation*. As noted in the submitted HRE, "the CEQA Guidelines state that rehabilitation in conformity with the Secretary's Standards 'shall be considered as mitigated to a level of less than a significant impact on the historical resource.'"[10]

Staff also **concurs** with the finding in the submitted HRE that since the Design for Development also requires that future projects that call for alteration of the historically significant portion of the landscape that surrounds Building 1 be consistent with the *Secretary of the Interior's Standards for Rehabilitation*, the proposed project will not result in a significant impact to the historically significant landscape features of Building 1.[11]

Staff **concurs** with the findings in the submitted HRE regarding the proposed treatment of the historically significant landscape that surrounds Buildings 1 and 2. The HRE notes, "The proposed treatment would not alter the contributing landscape areas of Buildings 2 and 3 in an adverse manner which would significantly affect their ability to contribute to the significance of the property as it exists now."[12]

Staff **does not concur** with the findings in the submitted HRE regarding the proposed demolition of Building 111. The Proposed Project calls for the demolition of Building 111. The submitted HRE finds that Building 111 (a fire house addition to Building 3, which had been completed by the time of the GGIE) is a character-defining feature of the National Register listed Building 3, and therefore that its demolition would result in a significant adverse impact to the resource.

Staff concurs with a supplemental memo submitted by the Project Sponsor, prepared by Page & Turnbull, which finds that "Building 111 was not designed as an integral feature of Building 3, but instead was an addition constructed to serve as a firehouse during the GGIE. "[13] Further, Staff concurs with the finding that:

> Based on its construction with less-refined materials, intended temporary function, and omission from the GGIE conceptual drawings, it is evident that Building 111 was a secondary addition to the GGIE plan. We believe that Building 111 was included in the National Register listing because of its age, not because it is considered an integral feature of Building 3 [...]Therefore, we believe that Building 111 does not significantly contribute to the historic character of Building 3[...]While the Secretary's Standards discourage the removal of character-defining features that date from the period of significance, less than significant

[10] Ibid, Page 100.
[11] Ibid, Pages 100-101.
[12] Ibid, Page 102.
[13] Memo titled, "Information on the Landscape Treatment of Building 2; Description, Character-Defining Features and Proposed Design Criteria for Building 3," to Alexandra Galovich by Carolyn Kiernat and Gretchen Hilyard of Page & Turnbull, dated April 7, 2010, (Page 7). Available by request at the San Francisco Planning Department (1650 Mission Street, Suite 400, San Francisco, CA 94103) in the Case Docket for Case No. 2007.0903E. The document is referred to as the "Treasure Island HRE."

features can be removed without impacting the significance or character of the overall resource.[14]

After a review of the information submitted in the HRE as well as the additional memo provided to the Project Sponsor by Page & Turnbull, Staff has determined that the removal of Building 111 in the manner proposed would be consistent with the *Secretary of the Interior's Treatment of Historic Properties*, and would not result in a significant impact to Building 3.

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5. Character-defining features of the building to be retained or respected in order to avoid a significant adverse effect by the project, presently or cumulatively, as modifications to the project to reduce or avoid impacts. Please recommend conditions of approval that may be desirable to mitigate the project's adverse effects.

Notes: Buildings 1, 2, and 3, with their surrounding historically significant landscapes should be retained in order to avoid a significant adverse impact to the historic resources. As discussed above, rehabilitation in a manner consistent with the *Secretary of the Interior's Standards*, as called for in the Design for Development, will not result in a significant impact.

The proposed demolition of the USS Buttercup battleship simulator cannot be mitigated to a level that is less than significant.

Staff notes that an object, such as the USS Buttercup, may be relocated in a manner that maintains "enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association."[15] It appears that the USS Buttercup could be relocated to a new location on Treasure Island in a manner that would maintain sufficient historic features in order to convey its historic significance, and therefore reduce the impact to a less-than-significant level.

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6. Whether the proposed project may have an adverse effect on off-site historical resources, such as adjacent historic properties.

☐ Yes ☒ No ☐ Unable to determine

PRESERVATION COORDINATOR REVIEW

Signature: _____ Date: 6/2/10
Tim Frye, *Acting Preservation Coordinator*

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[14] Ibid, Page 7.
[15] National Register Bulletin 15, "How to Apply the National Register Criteria For Evaluation," (1990: National Park Service), Page 29.

CC:

Linda Avery, *Recording Secretary,* Historic Preservation Commission
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