

Consolidated Comments from Preservation Allies

## 6.0 DEMOLITION CRITERIA

Given the economic realities of adaptive reuse and the military pattern of existing development on Mare Island, some demolition is inevitable. The ~~Historic Guidelines~~ Historic Project Guidelines are intended to protect the integrity of the Historic District, the National Historic Landmark groupings, and areas of special preservation sensitivity. In addition to requirements for compliance with the *Secretary's Standards* and incorporation of identified character-defining features in new construction, the ~~Historic Guidelines~~ Historic Project Guidelines accomplish these goals by discouraging demolition of Landmarks and Contributing Resources.

Criteria for evaluating demolition proposals apply at three levels: the District, the area, and the individual structure. Proposed demolition must comply with the criteria at *each* level of review.

### 6.1 DISTRICT-LEVEL DEMOLITION CRITERIA

The Historic Districts are the primary historic resource for planning purposes within the Specific Plan area.<sup>33</sup> Development proposals which adversely impact the Districts, especially those which may adversely affect the District's eligibility for the National and California Registers, ~~Registers~~ are inconsistent with the Specific Plan. The ~~Historic Guidelines~~ Historic Project Guidelines are the mechanism by which adverse impacts to the Historic District are avoided or prevented.<sup>34</sup>

The ~~Historic Guidelines~~ Historic Project Guidelines must therefore identify the types of activities which have a potential for adversely affecting the District, and provide criteria for evaluating the impact of these activities. Initial guidance for criteria to evaluate impacts on the Historic District is provided by the National Park Service:

“For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity

The four National Historic Landmark groupings, which contain all 42 extant locally-designated Landmarks, are significant historic resources. However, as geographically discrete subunits, they do not form a single historic resource for planning purposes. Because the Historic District contains the majority of the NHL groupings, District-level review should adequately protect the NHL. In addition, because the City has designated most of the pre-1945 structures within the NHL as local Landmarks, individual building review will provide additional protection to the NHL groupings.

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Standards for evaluating impacts to Area Resources are discussed in Section 5.4.2, while minimizing or avoiding impacts to individual Historic Resources are discussed in 5.4.3.

even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance. ... A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.”

To protect the Historic District from significant adverse impacts, the City has adopted the following criteria for evaluating impacts to the Historic District from proposed demolitions:<sup>35</sup>

- ~~1. All Landmarks will be retained, unless the City makes a finding that the resource is in such condition that it is not “feasible” to preserve or restore it;~~
- ~~1. All Notable Resources will be retained, unless the City makes a finding that retention of the resource would be a “deterrent” to the successful reuse of Mare Island ;~~<sup>36</sup>
- ~~1. Demolition of a Component Resource is allowed upon a finding that the proposed demolition is reasonably necessary to implement the proposed Development Plan, including the provision of new infrastructure, additional surface parking, and roadways;~~
1. The Historic District must retain a cohesive mix of building eras, materials and architectural styles which reflects the existing multi-layered historic environment; and
  - a2. All retained contributing resources must be retained in a manner that protects their integrity through conformance with the *Secretary's Standards*.

## 6.2 AREA-LEVEL DEMOLITION CRITERIA

As discussed above in Section 4.8, the Reuse Area boundaries were selected on the basis of reuse planning rather than historic preservation concerns. Although their boundaries do not reflect historic considerations,

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New construction must comply with the *Secretary's Standards*, as described in Section 5.3.2. The demolition criteria in this Section address new construction primarily in the context of avoiding impacts to the Historic District which might otherwise be caused by demolition.

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As noted elsewhere in this document, the “deterrence” finding is required for all Notable Resources located in Reuse Areas 3B through 10A. Notwithstanding the foregoing, Notable Resources located in Reuse Areas 2A, 2B and 3A do not require a finding of “deterrence” as part of a demolition permit review.

the areas are intended to be a convenient vehicle for refining the Historic District impact analysis.

The ~~Historic Guidelines~~ Historic Project Guidelines establish Area-level standards and criteria for demolition within the Reuse Areas. However, as noted above, more fine-grained analysis may also include consideration of the State Historic Building Code, Chapter 8-10: Historic Sites and Open Spaces, character-defining features and Project Sites developed during the review process. The following

summary review of contributing resources by Reuse Area is intended to provide a quick overview of the Historic District’s Historic Resources. A more complete discussion of the setting is provided in preceding sections of these Historic Project Guidelines (see in particular, Section 4.7: Area Resources and Character-Defining Features) and in those sections of the Design Guidelines for the Mare Island Historic District (Appendix B.4) on Character Areas and Sub-Areas.

~~The following Area level demolition criteria will be supplemented and refined through additional surveys and analysis.~~

### **Reuse Area 1A:**

Only a small part of Area Reuse Area 1A, otherwise known as the North Island Industrial Park, is located within the Historic District. It contains only one Notable Resource, the Sentry House and Wall, constructed in 1936, which is part of the entry sequence to Mare Island. Demolition proposals within the Project Site of the Sentry House and Wall will be evaluated to ensure that impacts to the Sentry House and Wall will be avoided or minimized.

### **Reuse Area 2A:**

Reuse Area 2A contains four Notable Resources and five Component Resources, eight from Era 5 and one from Era 4. Although it contains a variety of non-residential buildings, the subarea is primarily defined by the cluster of large structures and recreational facilities lining Walnut Avenue. The corner of Walnut Avenue and G Street is prominently located on a main transportation corridor. The subarea does not contain waterfront resources and is not part of the Historic Core. Demolition proposals in Reuse Area 2A should be evaluated to ensure protection of the “street wall” along Walnut Avenue near its intersection with G Street, either by retaining existing resources or through appropriately-designed new construction that respects historic setbacks.

### **Area Reuse Area 2B:**

Area Reuse Area 2B contains two Notable Resources and two Component Resources, primarily from Era 4. The structures are scattered across the eastern

portion of the subarea, while the western portion is relatively undeveloped. Large expanses of asphalt paving cover open spaces between buildings. Although the subarea is adjacent to permanent open space to the south and west, it is primarily characterized by undistinguished structures with no central focus. Demolition proposals in Area Reuse Area 2B should be evaluated to ensure protection of the “corridor” along Walnut Avenue.

### **Area Reuse Area 3A:**

Area Reuse Area 3A contains five Notable Resources and ten Component Resources, primarily from era 5. Area Reuse Area 3A is located on the northern edge of the Historic District and contains few individually significant resources. The primary historic character of the subarea is drawn from a cluster of three small Spanish Eclectic buildings which line G Street and create an entry sequence to the Island from the causeway, in combination with the Sentry House and Wall in Area Reuse Area 1A. These masonry buildings highlight the contrast between the industrial causeway, the relatively serene entrance on G Street and the large utilitarian industrial buildings through the interior of Area Reuse Area 3A. Demolition proposals in Area Reuse Area 3A should be evaluated to ensure protection of the existing historic entryway along G Street.

### **Area Reuse Area 3B:**

Area Reuse Area 3B contains 14 Landmarks, 2625 Notable Resources and 2526 Component Resources. This relatively large subarea contains resources from all 5 eras, but is particularly rich in structures from era 3. The subarea draws its primary historic character from two sources: (a) a series of era 3 coal sheds which face the waterfront, share a common setback and roofline and are prominently visible from the mainland; and (b) an almost complete lack of landscaping, with asphalt paving conveying most open spaces. In addition, Area Reuse Area 3B is home to a few exceptional Classical Revival brick buildings from era 1 which are included in the Shipyard NHL. Area Reuse Area 3B is relatively densely developed in comparison to Area Reuse Area 1A through 3A and was clearly developed for pedestrian access. Demolition proposals in Area Reuse Area 3B should be evaluated to ensure protection of the Landmark structures, the strong visual presence of the era 3 coal sheds, the waterfront orientation, and the individually significant era 1 buildings, as well as to maintain the comparatively higher density of development and pedestrian orientation which characterize Area Reuse Area 3B.

### **Area Reuse Area 4:**

Area Reuse Area 4, known as the Historic Core, contains 17 Landmarks, 40 Notable Resources, and 30 Component Resources from all 5 eras, as well as four of the ten designated landscapes. Together with Area Reuse Area 3B, Area Reuse Area 4 contains some of the oldest buildings on Mare Island. The pace of construction in Area Reuse Area 4 increased dramatically in after the Spanish-American War, with 32 structures from era 3, 19 from era 4 and 27 from era 5. Area Reuse Area 4 is the most

evocative of all of the subareas, containing a mix of distinctive residences, bomb shelters, landscaped parks, waterfront uses and unique Classical Revival industrial buildings. The residential neighborhoods are characterized by extensive landscaping, while the industrial areas are distinguished by asphalt paving. Impressive officers' quarters line the north side of Walnut Avenue, providing a strong visual connection with each other and the landscaped parks to the south and east. The industrial areas are developed at a relatively higher density, similar to AreaReuse Area 3B, and were clearly planned for pedestrian access. AreaReuse Area 4 also contains Dry Dock 1, the first dry dock on the Pacific Ocean flanked by five Era 5 whirley cranes. Visually significant structures include Era 5 ships' warp and gantry cranes. Unlike many other subareas, ResuseArea 4 contains relatively few post-1945 structuresintrusions. Demolition proposals in AreaReuse Area 4 should be evaluated to ensure retention of the exciting mix of architectural styles and eraEras, as well as the strong visual rhythm and pattern of the officers' quarters, including the landscaped open space, along the Walnut Avenue frontage. Demolition proposals, coupled with new construction, should also retain the comparatively higher density of development and pedestrian orientation which characterize both AreaReuse Areas 3B and 4. and protect the integrity of cultural landscapes.

#### **AreaReuse Area 5:**

AreaReuse Area 5 contains one Landmark, 2522 Notable Resources and 230 Component Resources. More than two-thirds of the buildings, including almost all of the Components, date from eraEra 5. This subarea is wholly industrial and contains the largest buildings on the Island, plus three dry docks and several rolling and fixed cranes from the World War II eraEra. AreaReuse Area 5 is less densely developed than AreaReuse Areas 3B and 4, contains only remnants of landscaping and appears to have been designed for vehicular access. The scale of the structures is dramatically larger than in the adjacent subareas. It contains waterfront historic resources visible from the mainland, but is not in the Historic Core. Demolition proposals in AreaReuse Area 5 should be evaluated to ensure retention of views of historic resources resources along the waterfront from the mainland.

#### **AreaReuse Area 6:**

AreaReuse Area 6, known as the North Residential Village, is primarily located outside of the Historic District, but nonetheless contains four Landmarks, 3527 Notable Resources and 4250 Components. Almost half of the Contributing Resources are from eraEra 5, with another third from eraEra 4. AreaReuse Area 6 contains a high percentage of repetitive resources, including 20 World War II-eraEra officers' quarters and another 22 garages and storage sheds. AreaReuse Area 6 is primarily residential, although it transitions to industrial use to the north. Demolition proposals in AreaReuse Area 6 should respect the existing residential structures along Azuar Drive.

#### **AreaReuse Area 8:**

AreaReuse Area 8, known as the South Residential Village, contains fivefive Landmarks,

11 nine Notable Resources and nine eleven Component Resources, as well as four of the ten designated landscapes. It is located at the crest of a low sloping hill and features a variety of landscapes, including the prominent, centrally located Parade Ground which serves as the focal point for the subarea. Area Reuse Area 8 is primarily, but not exclusively, residential. It contains three fine Queen Anne residences designed as an NHL grouping, which were relocated from their original sites circa 1953. The eastern edge of the Parade Ground is dominated by a massive Classical Revival Barracks from era Era

3. the majority of the remaining Contributing Resources are utilitarian residential buildings from era Era 5 and later. Demolition proposals in Area Reuse Area 8 should be evaluated to protect the visual prominence of the Parade Ground and the existing landscapes.

### **Area Reuse Area 9:**

Area Reuse Area 9 contains one Landmark, 14 Notable Resources and five Component Resources, as well as two of the ten designated landscapes. The hilly, landscaped site is dominated by an 1899 Classical Revival Hospital, with a linear configuration accentuated by later additions. Related medical facilities were constructed during era Era 4, primarily in Spanish Eclectic or utilitarian style. The entire grouping, including the landscaping, is picturesque, and quite unusual for the Historic District. Demolition proposals in Area Reuse Area 9 should respect the existing relationships between the Hospital structure and the related facilities and protect the integrity of the cultural landscapes.

### **Area Reuse Area 10A:**

Area Reuse Area 10A, known as the South Industrial Park, contains four Notable Resources and 25 Components. Area Reuse Area 10A is located on flatlands along the eastern waterfront at the far eastern edge of the Historic District, visually and physically separated from the remainder of the District. Most buildings were constructed during era Era 5. Many of the densely grouped buildings are uniformly set back from Blake Avenue. Area Reuse Area 10A contains historic waterfront resources but, as a whole, the subarea is not oriented toward the water. Area Reuse Area 10A is owned by the State of California. Demolition proposals in Area Reuse Area 10A should respect the grouping, scale and massing of the existing buildings.

### **Area Reuse Area 10B:**

Area Reuse Area 10B contains two Components, both of which are consistent of two era Era 5 sentry houses constructed in a utilitarian style. Area Reuse Area 10B lies between Area Reuse Areas 9 and 10A, but its Component Resources are isolated and not visually connected to the remainder of the Historic District. This subarea contains waterfront historic Resources visible from the mainland. It is currently owned by the federal government and occupied by the U.S. Army Resource. Demolition proposals in Area Reuse Area 10B will not be subject to these Historic Guidelines Historic Project Guidelines while it is owned by the federal government. In the event that these resources are transferred to the City or

a private entity, demolition proposals will avoid the two sentry houses, although they may be relocated as appropriate.

### **6.3 INDIVIDUAL RESOURCE-LEVEL DEMOLITION CRITERIA**

In addition to impacts on the District and Area Reuse Areas, demolition proposals affect individual historic resources, both directly and indirectly. The level of review and the stringency of the review criteria will depend on the historic significance of the affected structures. No demolitions of Landmarks are proposed and none are expected. Demolition of Notable Resources is expected to occur occasionally on Mare Island if needed to upgrade infrastructure to civilian standards and due to the functional obsolescence of a limited number of structures. Demolition of Component Resources may be allowed if necessary to provide adequate infrastructure for the successful reuse of Mare Island.

~~The Mare Island Amendment does not contain any standards or criteria for issuance of demolition permits in general. Instead, the Amendment defers to these Historic Guidelines/Historic Project Guidelines to establish appropriate standards for issuance of demolition permits. Demolition permits are discretionary, except in the case of contributing resources which have lost integrity and are recommended for demolition in these Guidelines or which have been approved for demolition by the NPS.~~

#### **6.3.1 ~~Landmarks – Hardship Test~~ LANDMARKS – HARDSHIP TEST:**

Demolition of any individually-designated City Landmark is prohibited, unless denial of a demolition permit would leave the property owner with no beneficial economic use of the Landmark property. No demolitions of Landmarks are proposed as part of the Development Plan and none are expected.

Although not currently proposed, for issuance of a demolition permit for a Landmark, the following criteria will apply:

1. A.1. Criteria: The City will utilize the “hardship test” applied pursuant to the constitutional protections of the Fifth Amendment, which requires a showing that denial of demolition permit would leave the property owner with no beneficial economic use of the Landmark property. The property owner may meet this test by showing that there are no economically feasible alternatives to demolition of the Landmark.

2. B.2. Findings: The AHLC may issue a demolition permit for a Landmark if it finds both of the following:

(1)(a) although the Landmark has not been willfully neglected by the non-federal owner so as to result in its deterioration or abandonment, it is in such condition

that it is not feasible to rehabilitate, preserve or reuse under the hardship test; and

(2b) demolition of the Landmark, individually or cumulatively in combination with past, current, and reasonably foreseeable demolitions within the District, will not cause a substantial adverse change in the eligibility of the District for the National and California Registers.

**6.3.2 Notable Resources – Deterrence Analysis: NOTABLE RESOURCES OUTSIDE OF AREAS 2A, 2B, 3A, AND BUILDINGS 206, 208, 237, 257 -- DETERRENCE ANALYSIS AND OTHER CRITERIA**

**6.3.2 NOTABLE RESOURCES – FEASIBILITY ANALYSIS:**

Demolition of any Notable Resource is prohibited except as may occasionally be required to upgrade Mare Island infrastructure to civilian standards or due to the functional obsolescence of a limited number of structures. This standard is intended to be less exacting than the “hardship test” applicable to Landmarks, but more rigorous than the “reasonable necessity” applicable to Components.

A. Criteria for Notable Resource Feasibility Analysis:

Components. Additional criteria, as provided below, are also required to be considered.:

Prior to consideration of demolition of a Notable Resource, there must be an evaluation of the feasibility of all options to full demolition, such as use of the alternative standards of the State Historic Building Code, relocation, in a manner that is consistent with “Moving Historic Buildings,” or additions, interior renovations, and partial demolition/new construction that many not strictly confirm with the Secretary’s Standards.

If the evaluation of options does not identify feasible options to full demolition, the AHLC may make a determination that avoidance of demolition of a Notable Resource is infeasible if it finds that one of the following (1 or 2a, b, or c) applies:

(1a) The resource is located such that it substantially hinders reuse of a Landmark;  
or

(2b) The resource is located such that:

- (a1) it substantially impedes the ability of the owner to meet one or more other goals of the Specific Plan, such as circulation, access, parking, laydown area, park space, housing or infrastructure, or hazardous materials remediation; and
- (b) the cost of modifying the construction called for in the Development Plan is



unreasonable in relation to the significance of the resource; or

.(c) The cost of reusing or rehabilitating the resource is unreasonably high when compared to the estimated value of the resource after rehabilitation. In accordance with the Secretary's Standards, Relocation of Notable Resources should be required as an alternative to demolition.

(3)

#### B. Criteria for Unit Plan:

The following criteria must also be met followed prior to final issuance of a demolition permit for a a Notable Resource currently planned for

demolition in Reuse Areas 3B through 10A (outside of Reuse Areas 2A, 2B, and 3A and Buildings 206, 208, 237, 257):

(1a) Pursuant to Vallejo Municipal Code 16.116.075,a Unit Plan will have been approved for a replacement project that meets one of the following criteria standards:

.(a) Includes new construction within the footprint of the Notable Resource proposed for demolition; or

.(b) Involves the rehabilitation of a nearby Landmark or Notable Resource that will necessitate removing one or more Notable Resources of lesser reuse potential to create adequate parking, circulation, or lay down area for the rehabilitated Landmark or Notable Resource; or

.(c) Is part of a public works project.

.(2) The proponent of each Unit Plan Replacement Project must have demonstrated to the City, based on a feasibility analysis approved by the Planning Manager, sufficient commercially reasonable financial resources necessary to complete the proposed replacement project., based on a feasibility analysis approved by the Planning Manager.

.(3) The Unit Plan Replacement Project must be scheduled to commence within six (6) months of receipt of all necessary City approvals, based on a project schedule approved by the Planning Manager.

#### C.3. Criteria for Historic Landscape:

In addition to the above, anyd demolition project within any of the ten designated Historic Landscapes, all ten of which are classified as a Notable Resources, shall require a Cultural Landscape evaluation.<sup>37</sup> All Cultural Landscape evaluations shall become part of the Interpretive Program for the District.

#### D4, Historic American Building Surveyy Documentation:

The appropriate level of Historic American Building Survey (HABS) documentation, including photographs, measured plan drawings and a written description must be prepared to the extent that such documentation has not already been completed. The HABS documentation will be made available to the MIHPF and the Solano County,

John F. Kennedy Library.

E5, Exceptions:

For Reuse Areas 2A, 2B, and 3A, and Buildings 206, 208, 237, 257, demolitions consistent with the Master Development Plan (Appendix

For an overview of the methodology required for Cultural Landscape Reports, see the National Park Service publication, *A Guide to Cultural Landscape Reports: Landscape Lines*. Companion documents that are part of the Landscape Lines collection that also should be reviewed are *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques* and *A Guide to Cultural Landscape Reports: Appendices*.

E) are exempt from the Unit Plan ~~criteria~~ requirement ~~criteria~~ and HABS documentation, but shall be submit to the Deterrence Analysis.

F. Findings:

The AHLC may issue a discretionary demolition permit for a Notable Resource, if it finds all of the following:

.(1) The resource substantially impedes the ability of the owner to meet one or more goals of the Specific Plan in furtherance of the redevelopment of Mare Island; and

.(2) Full or partial reuse and relocation options have been considered and are not feasible; and

.(3) Demolition of the resource individually or cumulatively in combination with past, current, and reasonably foreseeable demolitions within the District, will not cause a substantial adverse change in eligibility of the District for the National and California Registers; and

.(4) All pre-conditions to demolition of a Notable Resource have been met, as set forth in Section 6.3.2.

**6.3.3 COMPONENT RESOURCES – “REASONABLE NECESSITY” FINDING**

**Component Resources – “Reasonable Necessity” Finding:**

Demolition of a Component Resource [not including Component Resources that may be part of a significant grouping of Component Resources attaining Notable Resource status] is allowed upon a finding that the proposed demolition is reasonably necessary to implement the proposed Development Plan, including the provision of housing, park space, new infrastructure, additional surface parking, and roadways based on mandatory State Historic Building Code alternatives and regulations.

A. Criteria for Reasonable Necessity Finding:

City Staff may make an administrative determination that the proposed demolition is reasonably necessary to circulation, access, parking, laydown area, park space, housing, or infrastructure, or hazardous materials remediation required to implement the Specific Plan;

B. Findings: City Staff may issue an administrative permit for demolition of a Component Resource if it finds both of the following:

- (a1) Demolition of the Component Resource is reasonably necessary to implement the proposed Specific Plan; and
- (2) Demolition of the resource individually or cumulatively in combination with past, current, and reasonably foreseeable demolitions within the District, will not cause a substantial adverse change in eligibility of the District for the National and California Registers.

The AHLC shall be notified of such findings before demolition is allowed to proceed and may vote to have the demolition of the Component Resource reviewed by that Commission.