

E. Cultural Resources

This section discusses potential impacts to cultural resources on the Oak Knoll Project site. Included is a description of the known historic resources on the project site, the regulatory environment governing protection of cultural resources, potential impacts associated with the project, and mitigation measures to reduce potential impacts to a less-than-significant level. Further, the analysis compares the proposed project's effects to those identified for the Maximum Capacity Alternative in the previously-certified 1998 EIS/EIR.

This analysis is provided in this SEIR because, as determined in the Oak Knoll Project Initial Study (provided in **Appendix A** to this SEIR), prepared in accordance with Public Resources Code (PRC) Section 21166 and CEQA Guidelines Section 15162, the project has the potential to result in new or substantially more severe impacts to historic resources, based on changes to the project and new information of substantial importance. Therefore, further environmental analysis was required and is presented herein.

Resources used to prepare this section include a historic resources inventory survey and related correspondence and forms prepared by Page & Turnbull, historic resource consultants, information provided by the State Historic Preservation Office (SHPO) and the U.S. Navy during the base reuse process, and the Oakland Cultural Heritage Survey (OCHS) process. Current resources prepared for this analysis of the Oak Knoll Project include an updated survey by Page & Turnbull dated October 2006, which is included on the SEIR Background and Technical Studies CD that accompanies this SEIR, as well as prior historical studies prepared by Page & Turnbull in 1994. Information provided in the 1998 EIS/EIR (which is also included on the SEIR Background and Technical Studies CD) is also referenced.

As discussed in Chapter I, Introduction, of this SEIR, the Oak Knoll Initial Study also determined that no further environmental review would be required for the other topics identified under *Cultural Resources* in Appendix G of the CEQA Guidelines to adequately assess the impacts of the proposed project compared to the Maximum Capacity Alternative in the 1998 EIS/EIR. These topics are archaeological and paleontological resources and human remains, which are analyzed thoroughly in the Initial Study.

Setting

Regulatory Framework

City of Oakland Historical Resources

In the City of Oakland, for purposes of evaluating environmental impacts under the California Environmental Quality Act, a historical resource is a resource that meets any of the following criteria:

- 1) A resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources;

- 2) A resource included in Oakland's Local Register of historical resources (defined below), unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
- 3) A resource identified as significant (e.g., rated 1-5) in a historical resource survey recorded on Department of Parks and Recreation Form 523, unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
- 4) Any object, building, structure, site, area, place, record, or manuscript which the Oakland City Council determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record. Generally, a resource is considered "historically significant" if it meets the criteria for listing on the California Register of Historical Resources CEQA Guidelines section 15064.5; or
- 5) A resource that is determined by the City Council to be historically or culturally significant even though it does not meet the other four criteria listed here.

A "local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution, unless the preponderance of evidence demonstrates otherwise.

In March 1994, the Oakland City Council adopted the Historic Preservation Element (HPE) of the Oakland General Plan (amended July 21, 1998). The HPE sets out a graduated system of ratings and designations resulting from OCHS and Oakland Zoning Regulations. The following HPE policy addresses identifying historic resources under CEQA:

HPE Policy 3.8 - Definition of "Local Register of Historical Resources" and Historic Preservation "Significant Effects" for Environmental Review Purposes: For purposes of environmental review under the California Environmental Quality Act, the following properties will constitute the City of Oakland's Local Register of Historic Resources:

- 1) All Designated Historic Properties (Landmarks, Heritage Properties, Study List Properties, Preservation Districts, and S-7 and S-20 Preservation Combining Zone Properties); and
- 2) Those Potential Designated Historic Properties that have an existing rating of "A" or "B" or are located within an Area of Primary Importance.

The OCHS uses a five-tier rating system for individual properties, ranging from "A" (highest importance) and "B" (major importance) to "E" (of no particular interest). This letter rating is termed the "Individual Property Rating" of a building and is based on the following criteria:

- 1) Visual Quality/Design: Evaluation of exterior design, interior design, materials and construction, style or type, supporting elements, feelings of association, and importance of designer.

- 2) History/Association: Association of person or organization, the importance of any event, association with patterns of history, and the age of the building.
- 3) Context: Continuity and familiarity of the building within the city, neighborhood, or district.
- 4) Integrity and Reversibility: Evaluation of the building's condition, its exterior and interior alterations, and any structural removals.

California Register of Historic Resources

The California Register of Historic Resources (CRHR) is an authoritative guide to the state's historical resources, and as such, it is a primary guide by which properties are considered significant for CEQA purposes. The CRHR includes resources listed in, or formally determined eligible for listing in, the National Register of Historic Places (NRHP), California State Landmarks, and Points of Historical Interest. The SHPO maintains a list of historic resources by county in its Directory of Properties in the Historic Property Data File. A building or structure identified on SHPO's Directory with a rating of 1 or 2 (on or determined eligible for the National Register) is considered to be "listed" on the CRHR.

Properties of local significance that have been designated under a local preservation ordinance (i.e., local landmarks), or that have been identified in a local historical resources inventory may also be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA.

In order for a resource to meet the criteria for listing in the CRHR, it must satisfy all of the following three provisions:

1. It meets one of the following four criteria of significance (PRC 5024.1(c) and CEQA Guidelines 15064.5):
 - (a) the resource "is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;"
 - (b) the resource "is associated with the lives of persons important in our past;
 - (c) the resource "embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;" or
 - (d) the resource "has yielded, or may be likely to yield information important in prehistory or history" (this criterion applies primarily to archaeological sites).
2. The resource retains historic integrity; and
3. It is fifty years old or older (except where it can be demonstrated that sufficient time has passed to understand the historical importance of the resource).

CEQA Guidelines

The state CEQA Guidelines indicate that projects that are consistent with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* generally “shall be considered as mitigated to a level of less than a significant impact on the historic resource” (Section 15064.5(b)(3)).

National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to identify, evaluate, and protect our historic and archeological resources. Properties listed in the Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The NRHP is administered by the National Park Service, which is part of the U.S. Department of the Interior.

To be listed on the NRHP, a property must be shown to be “significant” at the local, state, or national level under one or more of the following criteria.

1. Criterion A (Event): That are associated with events that have made a significant contribution to the broad patterns of our history.
2. Criterion B (Person): That are associated with the lives of persons significant in our past.
3. Criterion C (Design/Construction): That embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
4. Criterion D (Information Potential): That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity: The property must also possess historic “integrity.” Integrity is defined as “the ability of a property to convey its significance.” The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

- “Location” refers to the place where the historic property was constructed.
- “Design” is the combination of architectural elements that create the form, structure and style of the property.
- “Setting” is the physical environment surrounding a historic property.
- “Materials” are the original physical components that were combined during a particular period in time and in a particular pattern to form the historic property.
- “Workmanship” is the physical evidence of the building crafts and skills of a particular culture during a given period.

- “Feeling” is a property’s expression of the aesthetic or historic sense of a particular period of time.
- “Association” is the direct link between an important historic event or person and a historic property.

California properties listed in the NRHP are automatically listed in the CRHR.

Local Plans and Policies

The Oakland General Plan contains policies relevant to historic resources are contained in the Historic Preservation Element (HPE). As discussed in *Chapter IV.A, Aesthetics*, in this SEIR, the goals and policies contained in the various General Plan Elements are often in competition with each other. In reviewing a project for conformity with the General Plan, the City is required to ‘balance’ the competing goals and policies. Case law has determined that a project “need not be in perfect conformity with each and every policy” and that “no project could completely satisfy every policy stated in the General Plan, and that state law does not impose such a requirement.” (Sequoyah Hills Homeowners Association vs. City of Oakland, 1993). Conformity of the Oak Knoll Project with General Plan goals and policies most relevant to historic resources is discussed throughout the *Impact Analysis* discussion in this section.

The following HPE goals and policies are applicable to the Oak Knoll Project:

- HPE Historic Preservation Goal 2: To preserve, protect, enhance, perpetuate, use, and prevent the unnecessary destruction or impairment of properties or physical features of special character or special historic, cultural, educational, architectural or aesthetic interest or value. Such properties or physical features include buildings, building components, structures, objects, districts, sites, natural features related to human presence, and activities taking place on or within such properties or physical features.
- HPE Policy 3.1: Avoid or Minimize Adverse Historic Preservation Impacts Related to Discretionary City Actions: The City will make all reasonable efforts to avoid or minimize adverse effects on the Character-Defining Elements of existing or Potential Designated Historic Properties which could result from private or public projects requiring discretionary City actions.
- HPE Policy 3.5: Historic Preservation and Discretionary Permit Approvals: For additions or alterations to Heritage Properties or Potential Designated Historic Properties requiring discretionary City permits, the City will make a finding that: (1) the design matches or is compatible with, but not necessarily identical to, the property’s existing or historical design; or (2) the proposed design comprehensively modifies and is at least equal in quality to the existing design and is compatible with the character of the neighborhood; or (3) the existing design is undistinguished and does not warrant retention and the proposed design is compatible with the character of the neighborhood.

For any project involving complete demolition of Heritage Properties or Potential Designated Historic Properties requiring discretionary City permits, the City will make a finding that: (1) the design quality of the proposed project is at least equal to that of the original structure and is compatible with the character of the neighborhood; or (2) the

public benefits of the proposed project outweigh the benefit of retaining the original structure; or (3) the existing design is undistinguished and does not warrant retention and the proposed design is compatible with the character of the neighborhood.

- HPE Policy 3.7: Property Relocation Rather than Demolition: As a condition of approval for all discretionary projects involving demolition of existing or Potential Designated Historic Properties, the City will normally require that reasonable efforts be made to relocate the properties to an acceptable site.
- HPE Policy 3.8: Local Register of Historical Resources. Definition of “Local Register of Historical Resources” and Historic Preservation “Significant Effects” for Environmental Review Purposes: For purposes of environmental review under the California Environmental Quality Act, the following properties will constitute the City of Oakland’s Local Register of Historic Resources:
 - 1) All Designated Historic Properties (Landmarks, Heritage Properties, Study List Properties, Preservation Districts, and S-7 and S-20 Preservation Combining Zone Properties); and
 - 2) Those Potential Designated Historic Properties that have an existing rating of “A” or “B” or are located within an Area of Primary Importance.

The above HPE policies generally encourage, but do not mandate, the preservation of Oakland’s historic resources within the context of and consistent with other General Plan goals, objectives, and policies (as discussed in other parts of this SEIR and in the Oak Knoll Initial Study in **Appendix A** to this SEIR).

With respect to demolition or alteration of historic resources, as defined by HPE Policy 3.8, a determination of consistency with the above policies by the Planning Commission and City Council must be predicated upon a finding that, as specified in HPE Policy 3.5, “(1) the design quality of the proposed project is at least equal to that of the original structure and is compatible with the character of the neighborhood; or (2) the public benefits of the proposed project outweigh the benefit of retaining the original structure; or (3) the existing design is undistinguished and does not warrant retention and the proposed design is compatible with the character of the neighborhood.”

Background

Previous Surveys, Consultations and Determinations

In 1994, Page & Turnbull, historic resource consultants, prepared a *Context Statement and Historic Resources Inventory* (referred to as “1994 Historic Resources Inventory” or “1994 inventory”), which provided historic context and National Register Eligibility evaluation of 45 pre-World War II structures on the site (Page & Turnbull, 1994a). The 1994 Historic Resources Inventory analyzed the site for its eligibility as a historic district and analyzed individual structures (built prior to 1945). The 1994 Historic Resources Inventory determined that the only resource identified as having historical value on the project site was Club Knoll, the former

clubhouse (Club Knoll) and only surviving part of the former golf course use on the Oak Knoll site.

While the 1994 inventory stated that the style and location of an adjacent WWII-era garage relative to the clubhouse (approximately 50 feet north of Club Knoll, separated by a north service road) indicated that it was “clearly intended to be an integral element of the clubhouse facilities,” (1994 inventory form including Bldg. No.19 [garage], p.2), the 1994 *National Register of Historic Places Register Form for the Former Oak Knoll Golf and Country Club* (referred to as “1994 nomination form”) (Page & Turnbull, 1994b) determined that the garage was “not associated with the period of significance of the clubhouse” and was a “non-contributing structure” within the boundaries of the nominated property” (Club Knoll) (1994 nomination form, Sec. 8, p.1). Club Knoll was constructed in 1924; its associated garage was constructed in 1942. (Page & Turnbull, 1994) (Current photographs of Club Knoll are shown in **Figure IV.E-1**. A current photograph of the garage is provided in **Figure IV.E-2**.)

In 1995, OCHS placed Club Knoll on the City of Oakland’s Preservation Study List. OCHS assigned Club Knoll a “B” rating, which indicates that it is of “Major Importance” in the City’s five-tier rating system of A through E and therefore eligible for listing as a local landmark. The structure was therefore listed on the City of Oakland’s Local Register of Historic Resources (LRHR) as a “Designated Historic Property”. The “B” rating was assigned based largely on the architectural interest and integrity of the structure, and the “B” rating qualifies Club Knoll as a potential historic resource as defined by Section 15064.5 of the CEQA Guidelines and Policy 3.8 of the Historic Preservation Element (HPE) of the General Plan. The OCHS evaluation also identified the Club Knoll garage as a 1942 garage addition that was part of the change in Club Knoll’s historic setting over time, but only designated Club Knoll to the LRHR (OCHS, 1995).

As part of the 1996 Base Reuse Plan analysis, Page & Turnbull completed and submitted nomination forms for listing Club Knoll on the National Register of Historic Places (NRHP), consistent with the findings Page & Turnbull made in their 1994 inventory. Subsequent consultation with the Navy and the California State Office of Historic Preservation (SHPO) determined that neither Club Knoll nor its adjacent, free-standing WWII-era garage was eligible for listing in the National Register. That determination by the Navy and SHPO provided the basis for the environmental setting and finding of “no impact” presented in the 1998 EIS/EIR, however, this determination did not affect the City’s designation of Club Knoll as a *local* historic resource.

2006 Historic Architectural Resources Surveys and Determinations

The 2006 survey by Page & Turnbull (see **Appendix H** to this SEIR) identifies Club Knoll as eligible for listing in the California Register and the National Register; however, there has been no change in circumstances, other the local listing of Club Knoll. SHPO has not been consulted further. The 2006 survey also indicates that the Club Knoll garage may be considered a contributing resource to Club Knoll under local standards. As indicated above, the City’s 1995 designation identifies only Club Knoll and not its garage as a local resource.



North Elevation



South Elevation



SOURCE: ESA, 2007

Oak Knoll . 206232
Figure IV.E-2
Club Knoll Garage
(North Elevation)

The 2006 Page & Turnbull survey found that the overall NMCO site does not retain sufficient historical integrity to convey its history as a WWII-era semi-permanent hospital and be considered a potential historic district, consistent with its 1994 inventory and nomination form. This is due to the demolition of the majority of the WWII-era hospital and community buildings. Page & Turnbull further concluded that the site lacks sufficient integrity to be eligible as a potential cultural landscape according to Secretary's standards; the site has suffered from numerous alterations to topography, including new circulation paths and parking areas, substantial alterations to natural grade, and rerouting of natural resources (creeks). Therefore, the *overall* Oak Knoll site does not qualify for listing as a federal, state, or local historic district or cultural landscape (Page & Turnbull, 1994, 2006).

The historic resources considered for this SEIR analysis are summarized in **Table IV.E-1**. The only confirmed historic designation on the Oak Knoll Project site is Club Knoll as a designated local historic resource, consistent with the City's designation in 1995. The SHPO has not revisited or reversed its 1998 determination that Club Knoll was not eligible for listing at the state and/or national levels. Based solely on information presented in the 1994 and 2006 surveys by Page & Turnbull, this SEIR analysis also conservatively considers the adjacent WWII-era garage as a local contributing resource to Club Knoll, despite recognizing that the garage structure is not included as part of the City's local historic resource designation for Club Knoll.

**TABLE IV.E-1
HISTORIC RESOURCES ON THE PROJECT SITE**

Building Name	Existing Local Historical Ratings (OCHS) or Status	Existing State / National Status Ratings (SHPO)^a	Historic Resource under CEQA? (Yes/No)
Club Knoll	"B" - Designated Historic Property of Major Importance	"6Y" – Ineligible for National Listing through consensus through Section 106 processes; not evaluated for State listing.	Yes
Club Knoll Garage	Potentially Contributing Resource to Club Knoll ^b	"6Y" – Ineligible for National Listing through consensus through Section 106 processes; not evaluated for State listing.	No

^a Based on 1998 determination by the Navy and the California State Office of Historic Preservation (SHPO) that neither Club Knoll nor its adjacent, free-standing WWII-era garage was eligible for listing in the National Register.

^b Based solely on Page & Turnbull's 2006 Historic Resources Inventory; Page & Turnbull's 1994 National Register Form (Nomination) designates garage as "noncontributing" resource to Club Knoll; the City's 1995 evaluation and determination designated only Club Knoll to the Local Register of Historic Places (LRHR).

SOURCE: Page & Turnbull, 2006

Cultural Resources Impacts Discussion

Significance Criteria

The current significance criteria for cultural resources impacts are listed below, as updated by the City of Oakland in May 2007, after publication of the Initial Study Checklist for the proposed project. An impact to cultural resources would be considered significant if the project would result in any of the following:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. Specifically, a substantial adverse change includes physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be “materially impaired.” The significance of an historical resource is “materially impaired” when a project demolishes or materially alters, in an adverse manner, those physical characteristics of the resource that convey its historical significance and that justify its inclusion on, or eligibility for inclusion on an historical resource list (including the California Register of Historical Resources, the National Register of Historical Resources, Local Register, or historical resources survey form (DPR Form 523) with a rating of 1-5);
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5;
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- d) Disturb any human remains, including those interred outside of formal cemeteries.

As previously indicated in the above discussion of the CRHR, the state CEQA Guidelines indicate that projects that are consistent with the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* generally “shall be considered as mitigated to a level of less than a significant impact on the historic resource” (Section 15064.5(b)(3)). Topics with No Impact or Otherwise Not Address in this SEIR

The information and analysis presented in the Initial Study (provided as **Appendix A** to this SEIR) provides substantial evidence for the conclusion, that 1) the analyses in the 1998 EIS/EIR and the Initial Study, with respect to the project, satisfy the requirements of CEQA, and 2) CEQA standards triggering preparation of further environmental review do not exist for Criteria “b” through “d,” listed above. The Initial Study identified potentially significant impacts for each of these criteria, and identified feasible mitigation measures to reduce the impact to less than significant.

A summary of the Initial Study conclusions for each of these criteria is provided in Chapter VI, CEQA Overview (under *Effects found to be Less than Significant*).

Impacts and Mitigation Measures

Historic Resources

The following discussion addresses the potential historic resources effects of the project, pursuant to Criterion “a.”

Comparison of the Proposed Project and the 1998 EIS/EIR Maximum Capacity Alternative, Relevant to Historic Resources

The Oak Knoll Project would retain and rehabilitate Club Knoll to allow non-profit or community use or administrative uses of the structure. This analysis of whether a potentially significant effect would result to an historic resource considers that the project will involve repair and alterations to prepare the structure for reuse and demolition of the Club Knoll garage. The 1998 EIS/EIR did not specify whether development of the Maximum Capacity Alternative would involve demolition of the garage. This analysis assumes no other differences are identified for the proposed project and the Maximum Capacity Alternative that would affect the potential impacts to historic resources.

Changes in Circumstances and Information Since the 1998 EIS/EIR

Pursuant to PRC Section 21166 and CEQA Guidelines Section 15162, the following discussion considers substantial changes to circumstances or new information of substantial importance that may result in the proposed project having a new significant impact not previously identified for the Maximum Capacity Alternative in the 1998 EIS/EIR.

Physical Condition

Club Knoll and its garage have experienced extensive vandalism and deterioration since preparation of the 1998 EIS/EIR, however, no other changes have occurred to either structure or the physical setting of the site that would alter the historic status of Club Knoll or the garage. The deterioration of Club Knoll since preparation of the 1998 EIS/EIR, however, is relevant to this CEQA analysis; the 1998 EIS/EIR did not propose rehabilitation or other alterations to the structure likely because the building was substantially in operational condition at that time. The Maximum Capacity Alternative proposed only to “retain and reuse” Club Knoll for recreational use.

Historic Resource Designations

Since publication of the 1998 EIS/EIR, the analysis of historic resources pursuant to CEQA requires that a structure be analyzed for state and local register eligibility; the 1998 EIS/EIR only considered eligibility of structures, in particular, Club Knoll, for National Register eligibility. This approach, and the status of Club Knoll as a local historic resource and this SEIR’s consideration of the Club Knoll garage as a potentially contributing resource under local standards is “new information of substantial importance.” These factors were not considered previously in the 1998 EIS/EIR and could potentially result in the project having a new significant impact to historic resources due to the proposed alteration of Club Knoll and demolition of the garage, respectively. While the 1998 EIS/EIR analysis recognized Club Knoll’s

“B” rating and listing on the City of Oakland’s LRHR as a “Designated Historic Property” in the Setting discussion, the Impacts analysis did not recognize the status of Club Knoll as an “historic resource” as defined under CEQA Section 15064.5 or Policy 3.8 of the HPE of the General Plan.

Regulatory change that has occurred since the 1998 EIS/EIR include the City’s amendment of the HPE (following changes in state law) to create the LRHR.

Summary of 1998 EIS/EIR Historic Resources Impacts

Based on the historic determinations issued by the Navy and SHPO (discussed above), the 1998 EIS/EIR indicated that there were no significant historic resources located on the property, despite the OCHS “B” rating which makes the Club Knoll structure eligible for listing as a local landmark. The significance criterion applied in the cultural resources analysis in the 1998 EIS/EIR was that only “impacts to cultural resources listed on or eligible for the National Register of Historic Places are considered significant;” local or state listings were not considered. Therefore, the 1998 EIS/EIR analysis concluded that the Maximum Capacity Alternative would not impact resources since, under the criteria used in 1998, none existed on the property. The analysis also recognized that although the Club Knoll structure had been found not eligible for the NRHP, in any event, the Maximum Capacity Alternative would retain Club Knoll for recreational reuse. The 1998 EIS/EIR did not discuss or describe proposed treatment of the Club Knoll garage. Thus, the impact was less than significant. No impact was identified and no mitigation measures were required.

Proposed Project Impact Analysis (Project)

Impact CUL-3: Renovation of Club Knoll could result in a substantial adverse change in the significance of a historical resource by adversely affecting character-defining elements that account for Club Knoll’s inclusion in the local register. (Potentially Significant)

Approach to Analysis

The Oak Knoll Project would retain and rehabilitate Club Knoll but would demolish the Club Knoll garage. This analysis describes whether the alterations that are proposed in order to rehabilitate the Club Knoll structure for reuse would result in an adverse effect on the historic nature of the resource and thus result in a new significant impact not identified in the 1998 EIS/EIR.

Discussion of Effects to Club Knoll

The proposed project would retain and rehabilitate the Spanish Colonial / Mission Revival Style Club Knoll structure (**Figure IV.E-1**) for reuse. Some degree of repair and perhaps alteration to the former clubhouse is anticipated to be required to accommodate the proposed rehabilitation for reuse and to meet existing building safety codes and standards. Such repairs and alterations could potentially affect the exterior of the building.

The most notable exterior characteristics of the building are its overall design, which includes multiple levels and volumes; its immediate courtyard garden and arcade with decorative beams

and arches; its eclectic architectural style (reflecting Spanish Colonial/Mission Revival and Mediterranean Revival); and its high artistic value as compared with other buildings in the immediate vicinity and Oakland (OCHS, 1995; Page & Turnbull, 2006).

The project sponsor has specified the following preliminary design parameters for the proposed building repairs and alterations with respect to building's most identifiable characteristics:

1. Maintaining the overall architectural style of the building, specifically its exterior building form (roofline, tower, etc.) and defining materials (i.e. stucco exterior and clay tile roof);
2. Maintaining the historic building configuration defined by the U-shaped arcade and courtyard area;
3. Maintaining the immediate physical setting of the building as open space and ancillary parking and support functions;
4. Maintaining characteristic exterior details, such as arches, railings, beams, the stone fireplace, or identifying suitable replacement as required to meet existing codes (particularly structural requirements for seismic safety), subject to City review and approval.

While the above design parameters that the project sponsor has proposed (subject to review and approval by the City) are intended to respect the existing identifiable architectural character of the structure and are not anticipated to adversely affect the local historic resource, the HPE recognizes that certain alterations to an LRHR property could result in a significant environmental impact. However, alterations could have a less-than-significant effect if carried out in a manner consistent with the City's standards for historic preservation. Pursuant to HPE Policy 3.8, alterations to historic resources under CEQA would normally occur if they result in substantial adverse effects on the property's character-defining elements. As with any historic resource under CEQA (in this case, a "B" rated LRHR property) in Oakland, the LPAB would be required to review the proposed rehabilitation plans for the clubhouse to confirm the extent to which the plans are consistent with HPE Policy 3.5 and are consistent with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. Pursuant to HPE Policy 3.5, the LPAB would review the preliminary and final development plans for the rehabilitation for the adaptive reuse of Club Knoll, to confirm that; 1) the design matches or is compatible with but not necessarily identical to the property's existing or historical design; or (2) the proposed design comprehensively modifies and is at least equal in quality to the existing design and is compatible with the character of the neighborhood; or (3) the existing design is undistinguished and does not warrant retention and the proposed design is compatible with the character of the neighborhood. These findings will assist the LPAB in its determination of consistency with the *Secretary's Standards*.

In summary, a new potentially significant impact is identified compared to impacts identified for the Maximum Capacity Alternative in the 1998 EIS/EIR due to the status of Club Knoll as an

historic resource, as defined by CEQA and the Historic Preservation Element of the Oakland General Plan, which indicate that adverse affects to such resources could be a significant environmental impact

Discussion of Effects of Club Knoll Garage Demolition on Designation of Club Knoll

The proposed project would demolish the Club Knoll garage (**Figure IV.E-2**) to accommodate development of the Oak Knoll Community Plan. Specifically, new single family development would occur in the area where the garage is currently located. Because this analysis conservatively considers the garage to be a potentially contributing resource to Club Knoll (based on Page & Turnbull's most recent 2006 survey only), demolition of the garage could potentially affect the eligibility of Club Knoll as a local historic resource and constitute a new significant impact that was not identified in the 1998 EIS/EIR.

The garage was constructed in 1942, approximately 20 years after the construction of Club Knoll, and is located north of the main structure. While the 2006 historic resource inventory prepared by Page & Turnbull identified notable architectural features (a log lintel and paneled roll-up doors), the structure is currently dilapidated, appears structurally unsound (leaning) and has likely lost structural integrity. Findings in the 1994 nomination form that indicated the garage was "not associated with the period of significance of the clubhouse" and was a "non-contributing structure" within the boundaries of the nominated property" (Club Knoll) (1994 nomination form, Sec. 8, p.1).. In addition, OCHS did not note the garage as a distinct consideration in its evaluation of Club Knoll that resulted in its designation of Club Knoll (or determinations by the Navy and SHPO). Taking each of these considerations into account, demolition of the potentially contributing garage would not result in a significant adverse effect to the historic resource of Club Knoll. The project sponsor has considered the structure to have limited purposeful use within the Oak Knoll Project primarily due to the structure's small size and the low economic feasibility of the garage being restored for reuse or relocated to an alternative site. However, since the garage is not an historic resource itself, it would not be subject to HPE Policy 3.5 (*Historic Preservation and Discretionary Permit Approvals*) for demolition of potential designated historic properties requiring discretionary permits, or HPE Policy 3.7 (*Property Relocation Rather than Demolition*).

Effects of the Project to Other Structures and the NMCO Site

Page & Turnbull's 2006 update to its 1994 Historic Resources Inventory survey included a detailed review of every structure (in addition to Club Knoll and the garage) on the project site under state and local standards. Page & Turnbull concluded that the remaining structures (other than Club Knoll and the garage) on the project site do not appear eligible for individual listing in the national, state, or local registers due to age (less-than-fifty years old), lack of historic or architectural significance, or lack of integrity. The project would not potentially affect any historic resources on the site, other than Club Knoll and the garage.

Page & Turnbull found that the Oak Knoll site does not retain sufficient historical integrity to convey its history as a as a potential historic district or be to be eligible as a potential cultural

landscape. Therefore, the overall site does not qualify for listing as a federal, state, or local historic district or cultural landscape.

Impact Summary

As discussed above, the Oak Knoll Project proposes to rehabilitate Club Knoll for reuse, and certain alterations to this local historic resource could result in a potentially significant environmental impact (if they are not consistent with the HPE) , which was not previously identified for the Maximum Capacity Alternative in the 1998 EIS/EIR. Removal of the potentially contributing garage would not result in a significant environmental impact.

Implementation of the following new mitigation measure would ensure compliance with the HPE and reduce the potentially significant impact resulting from alterations to Club Knoll to less than significant:

New Mitigation Measure CUL-3: The project sponsor shall comply with the following measures:

- **Prior to issuance of discretionary permits to alter Club Knoll, the City Planning Commission and the Oakland Landmarks Preservation Advisory Board (LPAB) shall determine whether affirmative findings for the proposed alterations to Club Knoll could be made under Policy 3.5 (*Historic Preservation and Discretionary Permit Approvals*) of the General Plan Historic Preservation Element. Specifically, the City shall review the preliminary and final development plans for the rehabilitation for the adaptive reuse of Club Knoll, to confirm that 1) the design matches or is compatible with but not necessarily identical to the property's existing or historical design; or (2) the proposed design comprehensively modifies and is at least equal in quality to the existing design and is compatible with the character of the neighborhood; or (3) the existing design is undistinguished and does not warrant retention and the proposed design is compatible with the character of the neighborhood. If the City is unable to confirm at least one of the above findings, the project shall be modified to adhere to the HPE.**
- **All applicable recommendations by the LPAB regarding alterations proposed to Club Knoll, including those recommended in any existing or future historic architectural assessment conducted for the structure by a qualified architectural historian or historic architect and confirmed by the City, shall be implemented by the project, subject to approval by the Planning Commission, as appropriate. Recommendations that would avoid or reduce significant impacts to the Club Knoll structure shall be integrated into the project design prior to the City's approval of the Final Development Plan for Club Knoll.**

Significance After Implementation of Mitigation Measure: Less than Significant.

Proposed Project Impact Analysis (Cumulative)

Impact CUL 4: Renovation of Club Knoll and demolition of the adjacent garage and all existing NCMO structures on the project site would not combine with cumulative development in the City to form a significant cumulative impact to historic resources, particularly those involving military base reuse. (Less than Significant)

The renovation of Club Knoll or the demolition of all other buildings (including the Club Knoll garage) on the Oak Knoll Project site would not combine with other known past, present, or reasonably foreseeable projects involving military base reuse development or early 20th century golf course architecture in Oakland to result in a significant cumulative impact to historic resources with these associations.

As discussed in the project analysis above, the project would not potentially affect any existing historic resources on the Oak Knoll site because there are no other historic resources on the site (other than Club Knoll). The Oak Knoll site does not retain sufficient historical integrity to qualify for listing as a federal, state, or local historic district or cultural landscape; as stated in the 2006 survey by Page & Turnbull (and consistent with the 1994 inventory), the Oak Knoll site would not qualify for listing due to “the loss of the majority of the WWII-era hospital buildings and integrity issues with the hospital buildings, remaining WWII-era hospital buildings... (p.58). While, typically, the lack of an individual project impact for most environmental topics does not preclude the possibility of that a cumulative impact exists, however, if the Oak Knoll site is not a historic resource (now eligible as one), it could not combine with other historic resources to potentially result in a cumulative effect. However, another WWII-era military base in Oakland is discussed.

The City recently conducted environmental review for redevelopment of the Oakland Army Base (OARB), which would involve demolition and alteration of several structures associated with its historic use during WWII and Korean War periods. The OARB is located in West Oakland, approximately 8 miles from the project site. The OARB would result in significant impacts to the OARB Historic District and several contributing resources. As indicated above, because the majority of the WWII-era buildings at Oak Knoll have been demolished or have integrity issues substantial enough to preclude its qualification for listing (unlike the OARB), and since most of the remaining buildings at Oak Knoll do not represent the WWII-era, Oak Knoll would not combine with the effects of the OARB Project to result in or contribute considerably to a cumulative effect. Thus no cumulative impact to historic resources would result. No mitigation measure is required.

Comparison of Historic Resources Impacts

The 1998 EIS/EIR analysis concluded that the Maximum Capacity Alternative would not impact historic resources since none existed on the property by the criteria used. The analysis did not discuss or describe proposed treatment of the Club Knoll garage, nor did it consider cumulative effects to historic resources. Therefore, the significant impact identified above for the proposed project's impact to Club Knoll is a new potentially significant environmental impact not previously identified for the Maximum Capacity Alternative in the 1998 EIS/EIR. New

Mitigation Measure CUL-3 is identified to reduce the potential impact to less than significant. Removal of the potentially contributing garage would not result in a significant environmental impact, and the project would not result in a cumulative historic impact.

Non-CEQA Consideration of Impact with Pre-Base Closure Conditions – Historic Resources Impacts

Consideration of the pre-closure setting is not relevant to the project's impact to historic resources.

References – Cultural Resources

City of Oakland, *General Plan, Historic Preservation Element*, amended July 21, 1998.

City of Oakland, *Draft Environmental Impact Report for the Oakland Army Base Area Redevelopment Plan, SCH 2001082058*; accessed May 15, 2007 at http://www.oaklandnet.com/government/ceda/revised/planningzoning/commission/eir/0_Cover.PDF; April 2002.

Oakland Cultural Heritage Survey, Club Knoll - Evaluation Sheet for Landmark Eligibility, June 7, 1995.

Page & Turnbull, *Context Statement and Historic Resources Inventory: Naval Medical Center, Oakland, California*, Contract No. N62474-93-M-2193. January, 1994a.

Page & Turnbull, *National Register of Historic Places Register Form – Former Oak Knoll Golf and Country Club Clubhouse, Oakland, California*, Contract No. N62474-93-M-2193. January 1994b.

Page & Turnbull, *Historic Resources Inventory and Assessment Report*, Final Draft, Oak Knoll (Former U.S. Navy Hospital, Oakland, CA). October 26, 2006. (Included on the CD of Background Reports and Technical Studies provided in the back of this SEIR.)

U.S. Department of the Navy Engineering Field Activity and City of Oakland, *Final Environmental Impact Statement / Environmental Impact Report for the Disposal and Reuse of Naval Medical Center Oakland (Vol I-II) - SCH 95103035*, April 1998. (Included on the CD of Background Reports and Technical Studies provided in the back of this SEIR.)