



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Historic Resource Evaluation Response

Case No.: 2014.0713E
Project Address: Pier 70 BAE Ship Repair
Zoning: M-2 (Heavy Industrial) Zoning District
40-X Height and Bulk District
Block/Lot: 4046/001 and 9900/068
Date of Review: February 20, 2015

Staff Contact: Richard Sucre (Preservation Planner)
(415) 575-9108
richard.sucre@sfgov.org

Melinda Hue (Environmental Planner)
(415) 575-9041
melinda.hue@sfgov.org

PART II: PROJECT EVALUATION

PRE-EXISTING HISTORIC RATING / SURVEY

On April 17, 2014, Pier 70 was listed in the National Register of Historic Places (National Register) as part of the "Union Iron Works Historic District." The Union Iron Works Historic District is significant under National Register Criterion A (Events) and Criterion C (Design/Construction) within the areas of maritime industry and industrial architecture. This district is significant at the national level under for its association with the development of steel shipbuilding in the United States. Union Iron Works is significant for its pioneering technological developments in shipbuilding, and the production of significant wartime vessels. The historic district is also significant as a physical record of the trends in industrial architecture from the late 19th-century through World War II. The period of significance begins in 1884, with the construction of the shipyard, and ends in 1945 at the close of World War II, when the yard was at its greatest build-out.

This historic district contains:

- 38 Contributing Buildings (Building 2, 6, 11, 12, 14, 15, 16, 19, 21, 25, 30, 32, 36, 38, 40, 49, 50, 58, 64, 66, 101, 102, 103, 104, 105, 107, 108, 109, 110, 111, 113/114 (includes Building 23 and 24), 115/116, 117, 119, 120, 121, 122, and 123)
- 4 Non-Contributing Buildings (Building 41, 68, 127, and 141)
- 2 Contributing Sites (Irish Hill Remnant and Site of Slips 1, 2, and 3)
- 4 Contributing Structures (Slip No. 4; Cranes 14 and 30; Whirley Crane 27; and, Pier 68 Highwater Platform)
- 6 Non-Contributing Structures (Wharves 1, 3 and 4; Drydocks 2 and Eureka; Pier 70 Wharves 6, 7, and 8; Slips 5-8 Remnants; 20th Street Paving Stones; and, Rail Spur Remnants)

Other significant features include the fence on 20th and Illinois Streets.

The character-defining features of the historic district include:

- Waterfront location/shoreline
- Minimal planted vegetation
- Open areas that are either paved with asphalt or covered with gravel
- Streets that are improved without curbs and gutters, except for 20th Street, which has granite curbs
- Dense urban-industrial character
- Variation in materials, styles, rooflines, and window types
- Variation in height and scale, with resources that range from one to six stories (80 feet) in height, some with large footprints of 60,000 to 100,000 square feet.
- Certain groupings of buildings, such as the entry promenade along 20th Street and the Building 12 complex
- Features such as cranes, wharves and piers
- Ship repair activities
- Yard layout and plan

Any resource listed in the National Register is automatically designated in the California Register of Historical Resources (California Register).

Based on its designation in the California Register, Pier 70 is considered a “Category A - Historical Resources” for the purposes of the Planning Department’s California Environmental Quality Act (CEQA) review procedures.

PROPOSED PROJECT ☒ Demolition ☐ Alteration ☐ New Construction

PER DRAWINGS DATED: n/a

PROJECT DESCRIPTION

The proposed project includes renewal of the lease for BAE Ship Repair, which calls for the removal of twelve PCB electrical transformers and demolition of three buildings: Building 38 (Pipe and Electric Shop), Building 119 (Yard Washroom) and Building 121 (Drydock Office). In addition, the proposed project would demolish Cranes Nos. 2 and 6.

To assist in the evaluation of the historic district, Carey & Company, a historic preservation consultant, prepared an “Analysis of Proposed Demolitions within the Union Iron Works Historic District at Pier 70 (dated February 20, 2015)” for the proposed project.

In addition, the Port of San Francisco provided:

- *Union Iron Works Historic District, Profiles of Contributing and Non-Contributing Resources Proposed for Demolition* (Received January 30, 2015); and,
- *Union Iron Works Historic District: Proposed Master Plan Demolitions, Area of Project Site.*

PROJECT EVALUATION

If the property has been determined to be a historic resource in Part I, please check whether the proposed project would materially impair the resource and identify any modifications to the proposed project that may reduce or avoid impacts.

Subject Property/Historic Resource:

☒ The project will not cause a significant adverse impact to the historic resource as proposed.

☐ The project will cause a significant adverse impact to the historic resource as proposed.

Department staff finds that the demolition of three contributing resources within the Union Iron Works Historic District would not cause a significant adverse impact upon any qualified historic resource, nor would the removal of these three buildings severely impact the integrity of the larger historic district. Despite the removal of three contributing resources, the Union Iron Works Historic District would maintain its eligibility for listing in the National Register.

Project-Specific Impact: Removal of PCB Electrical Transformers

The twelve (12) PCB electrical transformers are not designated features and do not contribute to the Union Iron Works Historic District; therefore, their removal would not impact the historic status of the district or any of its contributing resources.

Project-Specific Impact: Crane Nos. 2 and 6

Crane Nos. 2 and 6 are not designated features and do not contribute to the Union Iron Works Historic District. In addition, Crane Nos. 2 and 6 are not considered to be historic resource in their own right. Therefore, their removal would not impact the historic status of the district or any of its contributing resources.

Project-Specific Impact: Removal of Buildings 38, 119 and 121

As noted above, the project would remove three contributing resources from the Union Iron Works Historic District, thus reducing the number of contributing buildings from forty-one to thirty-eight. The three contributing buildings include: Building 38 (a pipe and electric shop), Building 119 (a yard washroom) and Building 121 (a drydock office). Originally constructed in 1915, Building 38 produced components for a ship's mechanical and propulsion systems during the outfitting phases of shipbuilding, and later became a pipe and electrical shop by 1945. Originally constructed in 1936, Building 119 was one of two washrooms added during the late-1930s and one of four World War II-era washrooms. Finally, Building 121 was originally constructed in 1941 and has consistently been used as an office.

As noted within the consultant report:

While demolition of contributing resources is generally not considered an activity consistent with the Secretary Standards these demolitions support the functionality of the existing ship repair operations which is a form of the historic use of the site. Renewal of the lease for another 20 years would sustain the economic viability of the ship repair yard which in turn supports the preservation of the historic district.

While demolition of contributing resources is generally not considered an activity consistent with the Secretary Standards, these demolitions support the functionality of the existing ship repair operations which continues the historic industrial use of the site. Renewal of the lease for another 20 years would sustain the economic viability of the ship repair yard which in turn supports the preservation of the historic district.

Within the 15 acre shipyard leasehold Buildings 38, 119 and 121, all of which were associated with ship fabrication and repair, would be demolished to support the shipyards need for additional open lay down space to support the staging of repairs of large vessels immediately adjacent to the Pier 68 High Water Platform and the two floating drydocks. Repair of today's very large vessels requires significant dock, or landside staging areas that are not currently available at this site. Additionally, Buildings 38 and 119 were significantly damaged in the 1989 Loma Prieta earthquake. These two buildings are red-tagged due to their hazardous condition.

Maintaining a viable maritime industrial activity on fifteen acres of the Historic District is considered a preservation activity in and of itself because it is essentially a form of the historic use and the purpose for which the site was developed. The on-going ship repair activity is a character defining feature of the Historic District and provides an authenticity that is experienced by the public through the perpetuation of industrial character, the berthing of large vessels and the use of Whirley cranes in the day to day operations, all of which are visible to the public.

Building 38

Building 38 dates back to the WWI era of the shipyard's development. Its integrity was significantly compromised by damage from the 1989 earthquake and subsequent structural failure especially at the south elevation where the upper portion of the building wall collapsed. Its removal would not compromise the significance of the Historic District.

In addition to Building 38, the Historic District contains three more prominent contributing resources from this period of development including Buildings 108 (Planning Mill and Joinery Shop), Building 109 (Plate Shop No. 1) and Building 111 (Main Office and Substation No. 3). Building 111 is recognized in the National Register nomination as being of "high artistic merit" and therefore is a superior WWI era resource within the district. The proximity of these three resources near the shoreline and Pier 68 High Water Platform would allow the district to continue to convey this early era of development and maritime activity despite the loss of Building 38.

Building 119

Building 119 is also red tagged because of structural failure attributed to the 1989 earthquake. It is one of numerous WWII era restroom locker room facilities that developed within the shipyard to support the peak workforce and is one of three such freestanding facilities developed outside of an existing building that are extant. This resources type would continue to be represented within the district by Building 110

which is very similar in size, plan, architectural treatment and use of materials, as well as interior furnishings.

Building 121

Building 121 was originally the Time Keepers Office and was constructed to occupy a niche between north elevation of Building 6 and what was Building 41, the Shipyard Fire Station. Both Building 121 and 41 were located on the southern wooden portion of Pier 68 High Water Platform. This portion of the High Water Platform and Building 41 were constructed of wood during WWII and are no longer extant. The relocation of Building 121 prior to 1975 has resulted in the six-sided building no longer conveying the unique relationship it had with the other two buildings. Although the building was found to maintain sufficient integrity to qualify as a district contributor, its loss would not impact the integrity of the district because of its modest size, newer context and because other contributing resources such as Buildings 110, 122 and 123 provide examples of small scale facilities development in the shipyard during WWII.

The Department concurs with the consultant's analysis of the project-specific impacts on the site's historic resources. Factoring in the integrity and significance of these three resources relative to the larger historic district, the Department finds that their demolition would not impact the integrity of the larger historic district due to the diminished integrity of the three subject properties, size of the historic district with 38 remaining contributing resources, and the number of other resources that are similar in architectural character, history, and date of construction. Building 38 was one of several buildings constructed to support the shipbuilding activities in World War I. Despite its demolition, the district would retain other examples of support structures and World War I-era buildings. Buildings 119 and 121 are ancillary World War II-era buildings, which were constructed to support the shipbuilding activities. Other properties within the district assist in conveying the significance of these resources. Therefore, the project would not result in a significant adverse impact upon the site's historic resources, since the demolition of these three building would not materially impair the designation of the surrounding historic district.

Cumulative Impact-Demolition within Union Iron Works Historic District:

Since the listing of the historic district in the National Register, no demolitions have occurred within the district boundaries.

In May 2014, the Pier 70 Historic Core and Orton Development underwent environmental review for the rehabilitation of Buildings 14, 101, 102-122, 104-123, 113/114 and 115/116. This project did not result in any cumulative impact to the surrounding historic district, since the rehabilitation met the Secretary of the Interior's Standards for Rehabilitation (See Case No. 2013.1168E).

Since completion of the Pier 70 Historic Core, the Department has received two new development applications for work within the Union Iron Works Historic District, including an application for environmental review of the Waterfront Site submitted by developers Forest City (See Case No. 2014-001272ENV), and an application for environmental review of the proposed Crane Cove Park submitted by the Port of San Francisco (See Case No. 2014-001314PPA). In addition, the Port of San Francisco anticipates a few individual projects within the Union Iron Works Historic District, including revisions to the Extension of Streets and Sidewalks, Rationalizing Existing Development Patterns to Accommodate New Infill Development, and Removal of Navigational Hazards—all of which would be undertaken as

individual projects outside of the development applications sponsored by Forest City and Crane Cove Park. These projects cumulatively call for the demolition of contributing resources within the Union Iron Works Historic District. In addition to the demolition of the three buildings as part of the BAE Ship Repair project, the future project includes the demolition of the following thirteen contributing resources and one non-contributing resource:

- Building 11 (Tool Room and Navy Office) – Forest City/Waterfront Site
- Building 15 (Layout Yard) – Forest City/Waterfront Site
- Building 16 (Stress Relieving Building) – Forest City/Waterfront Site
- Building 19 (Garage No. 1) – Forest City/Waterfront Site
- Building 25 (Washroom and Locker Room) – Forest City/Waterfront Site
- Building 30 (Template Warehouse) – Crane Cove Park
- Building 32 (Template Warehouse) – Forest City/Waterfront Site
- Building 36 (Welding Shop) – Port of San Francisco Rationalize of Existing Development
- Building 40 (Employment Office Annex) – Extension of Streets and Sidewalks
- Building 50 (Pier 68 Substation No. 2) – Crane Cove Park
- Building 66 (Welding Shed) – Forest City/Waterfront Site
- Building 117 (Shipyards Training Center) – Extension of Streets and Sidewalks
- Building 64 aka Substation No. 6 (Pier 70) – Removal of Navigational Hazards
- Wharf No. 8 (Non-Contributing Structure) – Removal of Navigational Hazards

Collectively, all of these projects would result in the removal of fifteen contributing resources from the designated historic district.

As noted by the author of the National Register Nomination, Carey & Company, the historic district was planned to accommodate a limited amount of demolition and a substantial amount of new development. As noted within the provided consultant report:

Carey and Company has analyzed the proposed demolitions and finds that the loss of these specific fifteen contributing and one non-contributing resource would impact the Historic District however the impact would not be significant for the following reasons:

- The demolitions would enhance the on-going ship repair activity by allowing for additional space related to repair activities. The authenticity of maritime use on a fifteen acre portion of the Historic District would allow the public to experience large scale heavy industrial ship repair activity, the only such maritime use on San Francisco Bay.
- The preservation strategy created a hierarchy of historic resources: Very Significant, Significant, Contributing and Non-contributing. It also identified conditions for removal: Advanced structural deterioration; infeasibility of

adaptive use; issues with environmental remediation; conflicts with planned open spaces, public access, street and sidewalk extensions; interfere, or hinder in a negative way, the adaptive use and rehabilitation of priority historic resources; loss of individual resources would not affect the significance of the historic district. Carey & Co. used this system of resource hierarchy and conditions for removal in its evaluation of the proposed demolitions.

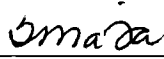
- A significant concentration of World War II era contributing resources would remain on the site. They would continue to provide strong visual and physical examples of the WWII era of the Historic District. In many instances the resources to be demolished are repeated elsewhere on the site as is the case with World War II warehouses, restrooms and electrical power substations.
- The proposed demolitions would allow the existing ship repair facility to continue into the future by allowing for expanded open staging areas for ship repair and provide opportunities for new compatible infill development that will help support the adaptive use of the remaining historic resources.
- The proposed loss of these resources would not result in the need to adjust the boundary because it represents the historic ownership and maximum development of the district at its peak operation during WWII. The boundary for the district, as with most historic districts, includes areas with non-contributing resources.

Overall, the Department concurs with this analysis and finds that the proposed demolitions would not impact the designation of the historic district within the National Register of Historic Places. In addition, the proposed demolitions would not materially impair the eligibility of the Union Iron Works Historic District. Therefore, these projects would result in a less-than-significant cumulative impact upon historic resources present on the project site.

Summary

As currently proposed, the project will have a less-than-significant impact upon a historic resource, as defined by CEQA.

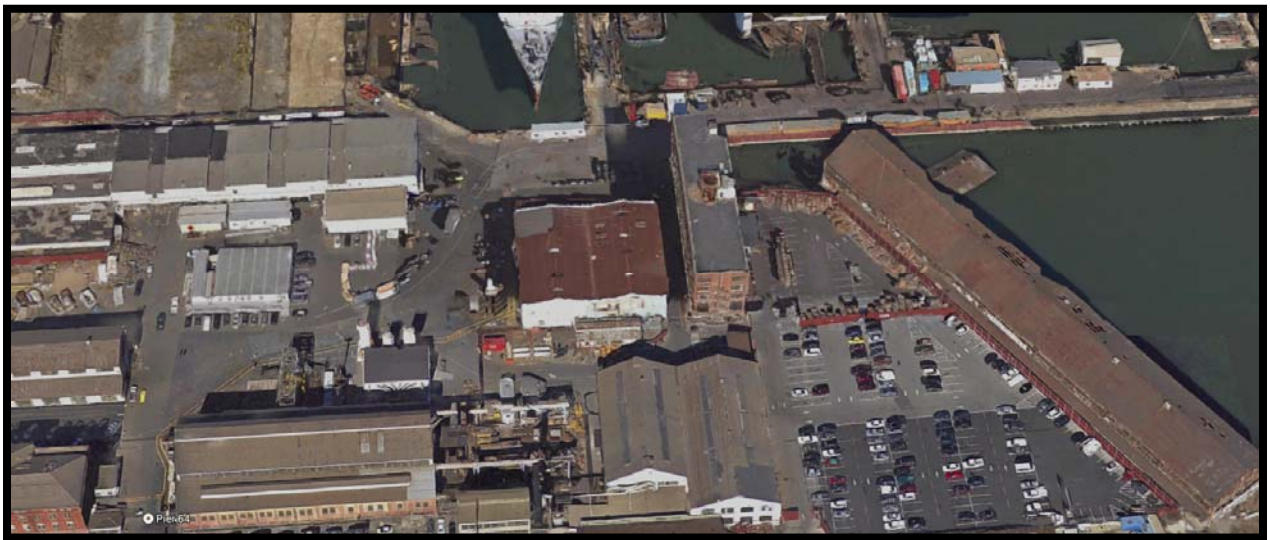
PART II: SENIOR PRESERVATION PLANNER REVIEW

Signature: 
Tina Tam, Senior Preservation Planner

Date: 2 - 20 - 2015

cc: Melinda Hue, Environmental Planning
I:\Cases\2013\2014.0713

IMAGES



Aerial View, Pier 70
(Source: Google Maps, 2014; Accessed December 30, 2014)