



## City of Alameda California

July 18, 2022

Julianne Polanco  
State Historic Preservation Officer  
Department of Parks and Recreation  
Office of Historic Preservation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816-7100

### **BY ELECTRONIC MAIL**

RE: Nomination of US Maritime Service Officers School to the National Register

Ms. Polanco,

Once again I write to you as the Chief Local Elected Official of the City of Alameda (City), asking you not to proceed with the US Maritime Service Officers School nomination scheduled for an August 5 hearing before the State Historic Resources Commission.

The City of Alameda has always honored and recognized its rich naval and maritime history, including the immense and significant contributions and sacrifices our veterans made to this country, as demonstrated by over 4,000 individual historic and cultural resources the City proudly stewards. The City also recognizes the notable history of the US Merchant Marines, but we agree with experts that the surviving site consists of merely fragments of the original campus. Additionally, the Alameda Historical Advisory Board (HAB) and City Council have determined that the site is ineligible for listing under any National Register of Historic Places (NRHP) criteria.

As you know, in 2003, General Services Administration (GSA) and State Historic Preservation Officer (SHPO) determined that the site was ineligible for the NRHP due to loss of integrity from demolition in the 1960s. Following the 2003 determination, GSA demolished additional buildings, and as a result, the integrity of the site was further and significantly diminished, to the point that the remnants cannot physically convey its former significance.

Your June 3, 2022 letter to the City describes the nomination as a “new request” containing “a revised Statement of Significance, expanded boundary, new photos, and a new contributor.” However, after close examination, the nomination essentially refers to the same site, same buildings, and same history that was already studied by the HAB and numerous parties and preservation experts over the past twenty years.

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Office of the Mayor

2263 Santa Clara Avenue, Room 320  
Alameda, California 94501  
510.747.4701

Between 2018 and 2021, the City re-studied the history of the entire former US Maritime Officers School site as part of its review of development plans for future use of the property. The HAB found the site ineligible for NRHP listing under any criteria, either as individual buildings or collectively. Based on that finding, the HAB approved demolition of Buildings 1 and 2, and other accessory buildings, a decision that was supported by the Alameda City Council. To reiterate, the “new” nomination provides no new information beyond what the HAB, City Council, and others have already studied.

I also ask that SHPO take no further action on this nomination because City experts have found numerous factual errors and inaccuracies in the nomination, described below:

1. The nomination lacks an adequate boundary description and justification. The description of the proposed historic district boundary is based solely on what buildings remain today, rather than relating back to the former use of the site as a campus.
2. The nomination grossly misrepresents the remaining buildings as constituting a district of over 50% of the space of the former campus, when in fact, 18 of the original 27 buildings and structures on the former campus have been demolished. Furthermore, civilian development has encroached upon the site and its surrounding.
3. The nomination fails to adequately address the loss of integrity of the US Maritime Officers Training School, as extensively documented by the previous State Historic Preservation Officer, the renowned San Francisco architecture and preservation firm Page & Turnbull, and the City. Although the nomination describes various aspects of integrity, it omits important facts that demonstrate that the site and its surrounding, and the majority of surviving buildings lack integrity of design, materials, setting, feeling and association. The nomination simply ignores those facts that undermine the nomination.
4. The nomination fails to identify the former barracks building (Building 2) as retaining only half its original footprint due to prior demolition. Other extant buildings have been modified.
5. The nomination incorrectly lists Harry Bruno and Joseph Esherick as architects for the school. In fact, Harry Bruno served as a “site architect” whose primary role was managing on-site construction for US Coast Guard engineers; Bruno did not design the buildings. Joseph Esherick’s involvement was limited to a boiler room addition to Building 1 that was subsequently demolished and has therefore completely lost its integrity.
6. The nomination’s revised period of significance extends through the Korean War (also reviewed by HAB), but offers no new information about the site’s role during the Korean War. Particularly, the nomination fails to identify any features of the buildings or site that convey an association with the Korean War.
7. The nomination provides no comparison with the existing US Merchant Marine Academy at Kings Point, NY whose campus is still in use today, maintains its integrity, and offers a far more viable representation of US maritime school history.
8. It is obvious that the statements and evidence included in this nomination were simply cherry-picked from previous analyses and lack in-depth fact-checking. For example, the PCAD source cited in the nomination to justify a Harry Bruno association is based on information supplied by the nominating party herself.  
(<https://pcad.lib.washington.edu/person/8887/>).



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I urge SHPO to exercise due diligence and carefully review this nomination. (Please see attached City report describing inadequacies with the current nomination.)

Despite SHPO's description of this recent submittal as a "new" nomination, none of the purported revisions or alleged new information provided in the nomination constitute substantive changes to the record that HAB relied upon to find the site ineligible for NRHP listing. By contrast, overwhelming evidence demonstrates that the majority of the campus has been demolished and modified to the point that the remnants cannot physically convey its former significance as a historic district.

As a result, I continue to concur with HAB's 2021 finding that the site is ineligible for NRHP listing. Based on the facts and evidence cited in this letter, I, once again, request that SHPO remove this matter from the August 5th SHRC meeting agenda pursuant to 54 U.S.C. Section 302504(c)(2).

If you have any questions, please contact me at 510-747-4701.

Regards,



Marilyn Ezzy Ashcraft  
Mayor, City of Alameda

Attachment: City of Alameda Certified Local Government Report on the US Maritime Service Officers School National Register of Historic Places Nomination - July 2022

Cc: Beth L. Savage, Federal Preservation Officer, GSA  
Jane Lehman, Regional Historic Preservation Officer, GSA Pacific Rim Region  
Governor Gavin Newsom  
State Historic Resources Commission  
Rob Bonta, State Attorney General  
Nancy Skinner, California State Senator  
Mia Bonta, California State Assemblymember  
Armando Quintero, Director, California State Parks  
Gustavo Velasquez, Director, Department of Housing and Community Development  
Brian Holt, Chief of Planning, East Bay Regional Park District  
Dirk Brazil, Interim City Manager, City of Alameda  
Celena Chen, Assistant City Attorney, City of Alameda  
Allen Tai, City Planner, City of Alameda  
Henry Dong, Planner III, City of Alameda