



**City of Alameda
Certified Local Government Report
on the
US Maritime Service Officers School
National Register of Historic Places Nomination**

July 2022

EXECUTIVE SUMMARY:

This report was prepared by the City of Alameda (City), a Certified Local Government (CLG), in response to a June 3, 2022 request from the State Historic Preservation Officer (SHPO) to comment on a proposed nomination to add the former US Maritime Service Officers School site to the National Register of Historic Places (NRHP). The State Historic Resources Commission (SHRC) is scheduled to consider the nomination at its August 5, 2022 quarterly meeting. The nomination was reviewed by the City in April and found to have incomplete, inadequate, and erroneous information, and a previous evaluation for NRHP eligibility was also completed in 1996 which determined the site was not eligible for inclusion on the NRHP. The nomination, which SHPO describes as “revised” and “new”, does not provide any new information that has not already been considered by the Alameda Historical Advisory Board (HAB) and the City Council as part of the public record in 2021. The nomination contains numerous inaccuracies and distortions in the its portrayal of facts, particularly those regarding the proposed boundaries of the historic district as it relates to the original use of the site, as well as those relating to the integrity of the few remaining buildings, and attribution of the design of the complex to architects Harry Bruno and Joseph Esherick. Both the City, a Certified Local Government, and its chief local elected official, Mayor Marilyn Ezzy Ashcraft, strongly recommend that the property not be listed on the NRHP, and that SHPO and the SHRC to take no further action on the nomination pursuant to 54 U.S.C. Section 302504(c)(2).

BACKGROUND:

On February 23, 2022, SHPO notified the City about a nomination by Carmen Reid to add the former US Maritime Service Officers School site to the NRHP. The City responded in writing on April 12 and April 26 objecting to the proposed nomination. Pursuant to the National Historic Preservation Act, 54 U.S.C. Section 302504(c)(2), “if both the (local historic preservation) commission and the chief local elected official recommend that a property not be nominated to the NRHP, the SHPO shall take no further action...” On April 29, 2022, SHPO removed the nomination from the SHRC meeting

agenda due to an overwhelming number of public comments on the completeness of the application.

On June 3, 2022, SHPO notified the City that the nomination would be considered by the SHRC on August 5, 2022 and that the nomination had been revised. The City was provided 60 days to review and comment on the new nomination.

The current nomination comes after more than 20 years after the initial evaluation of the subject property. In 1996, the subject property was evaluated for eligibility for listing in the NRHP, and while the complex was found to possess significance under evaluation Criteria A and C, it was found to lack sufficient integrity for listing. In 2003, the General Services Administration (GSA) and SHPO determined that the site was ineligible for the NRHP due to loss of integrity from demolition of numerous buildings and site features. Following the 2003 determination, GSA demolished additional buildings. As a result, the integrity of the site was further diminished to the point that the remnants cannot physically convey its historic significance.

Between 2018 and 2021, the City re-studied the history of the entire former US Maritime Service Officers School site as part of reviewing development plans for the Alameda Wellness Center, which would provide housing and services for the senior unhoused population. The HAB concurred with previous findings that 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 four non-historic accessory buildings, a decision that was affirmed by the Alameda City Council on July 6, 2021. This report on the City's review of the nomination applies to the whole complex including the GSA, California State Parks, and East Bay Regional Parks District properties.

The nomination submitted to SHPO, and which will be considered at the August 5th, 2022 SHRC meeting, does not provide any new information that was not previously considered by the HAB and the City Council as part of the public record in 2021. The public record for the City hearings can be found at the following website under the heading McKay Certificate of Approval PLN20-0431 Public Record:

[https://www.alamedaca.gov/Departments/Planning-Building-and-Transportation/Planning-Division/Major-Planning-Projects,](https://www.alamedaca.gov/Departments/Planning-Building-and-Transportation/Planning-Division/Major-Planning-Projects)

HAB Resolution HAB-21-01:

<https://www.alamedaca.gov/files/assets/public/departments/alameda/building-planning-transportation/planning/reso-hab-21-01-pln20-0431-mckay-certificate-of-approval-reso.pdf>

City Council Resolution 15792:

<https://www.alamedaca.gov/files/assets/public/departments/alameda/building-planning-transportation/planning/resolution-15792-mckay-certificate-of-approval.pdf>

ANALYSIS:

A. Loss of Integrity:

In order to be eligible for listing in the NRHP, a property must retain both significance and integrity. As previously documented by the SHPO, preservation experts Page & Turnbull, and the City, the integrity of the site has been compromised through decades of demolition. The remaining buildings do not possess adequate concentration, linkage, and continuity of features to convey the significant historical and architectural associations of the original campus to qualify as a historic district.

Despite describing the various aspects of integrity, the nomination fails to address important facts that would otherwise show that the site, its surrounding, and the majority of surviving buildings lack integrity of design, workmanship, materials, setting or feeling. The following points further discuss why the site does not retain sufficient integrity to be eligible for inclusion on the NRHP:

1. Loss of Structures Important to the Maritime Mission of the Merchant Marines. The United States Maritime Service Officers School, Alameda, was built on a 32-acre site beginning in 1942, and consisted of a complex of more than 25 buildings connected by landscape and circulation features which were integral to its function as a campus. Due to the demolition of at least 18 original buildings, structures, and landscape features, and the construction of modern apartment buildings at the former location of the Administration Building, the remaining buildings as a group do not retain integrity of setting or feeling. The buildings and structures lost include most of those directly related to the training mission of the school, and include the Training Basin, Ship's Service Store, Night-Vision Training, Anti-Aircraft Training, Mast Assembly, Pier, Academic, Equipment, Administration, and Auditorium, and the Pool/Gymnasium. The Seamanship Building remains as the only building that conveys an association with the maritime use of the campus.

2. Loss of Administrative Core and Parade Ground. During its years of operation, the campus was a dense and cohesive landscape united not only by architectural similarity of the buildings, but by the buildings' arranged spatial relationships to one another, to circulation routes, to outdoor training areas, and to San Francisco Bay. The Parade Ground was a large, roughly rectangular, open space running east west across the northern portion of the site. The Administration Building, Pool/Gymnasium Building and Building 2 formed a distinct edge around the parade ground, defining its shape and size while providing a visual focal point for the entire campus. The Parade Ground played an important role as a central location for assembly, ceremonies, drills, and recreation for the campus. It was also an important element of the campus' site plan, forming a horizontal axis which intersected McKay Avenue and divided the campus into four quadrants. The quadrant containing the Administration Building and Parade Ground was the earliest to be sold by the federal government and altered with demolition and new construction following closure of the facility. This area has now

been replaced with apartment buildings and a shopping center. McKay Avenue now serves as the only remaining circulation left of the campus.



Figure 1.



Figure 2.



Figure 3.

Figures 1, 2, and 3 above show the parade ground being used as a central location for assembly, drills, and ceremonies. The parade ground is now occupied by apartment buildings. (usmm.org/alameda.html).

The nomination and proposed district boundary completely dismiss the missing administrative quadrant. The nomination incorrectly describes the original facility as *“an egalitarian design which doesn’t place auxiliary buildings in a subservient visual position when compared to a central focal point (e.g., an administrative building).”* (Section 8 Page 15 of the 2022 Nomination.) This is incorrect, as the site was clearly designed with the hierarchy of a military campus with buildings placed along vertical and horizontal axis that supported a central focus around the administrative core. Due to demolition of the buildings within this quadrant, the site can no longer convey this aspect of the campus design.



Figure 4 above shows the original administration building and gate house located at the corner of McKay Avenue and Central Avenue (ianewatts.org).

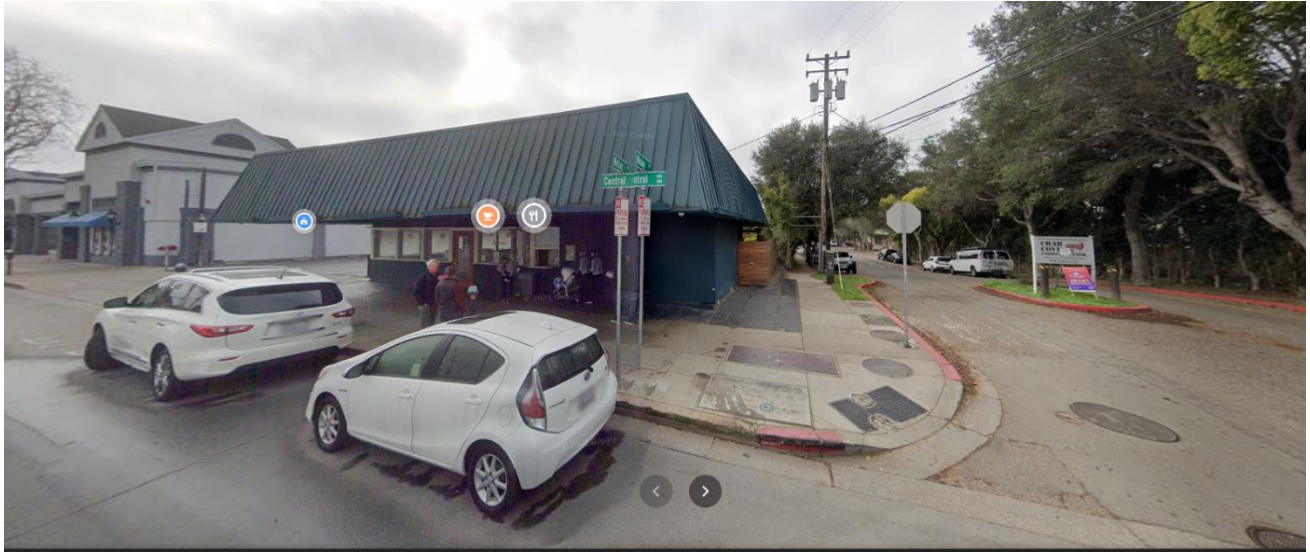


Figure 5 above shows the corner of McKay Avenue and Central Avenue today where the administration building and the gate house once stood. The administration building is now replaced by a shopping center and apartment buildings, the gate house has been demolished (Google Maps).



Figure 6 above shows the Administration Building and the Parade Grounds located across McKay Avenue from Building 2. Building 12, a small building located at the far left remains today as a sewer treatment building (ianewatts.org).

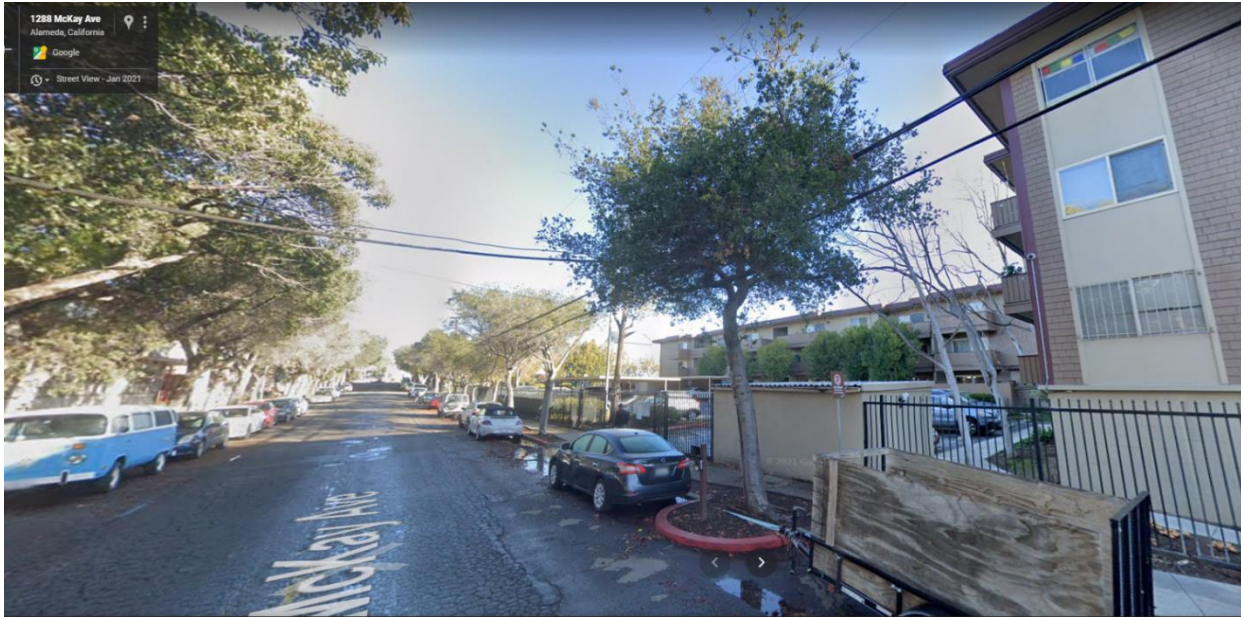


Figure 7 above shows McKay Avenue with Building 2 on the left, and apartments occupying what used to be the location of the parade ground. The parade ground played an important role as a central location for assembly, ceremonies, and drills for the campus. It is also an important element of the campus' site plan, because it formed a horizontal axis intersecting McKay Avenue, dividing the campus into four quadrants for campus functions and primary circulation (Google Maps).

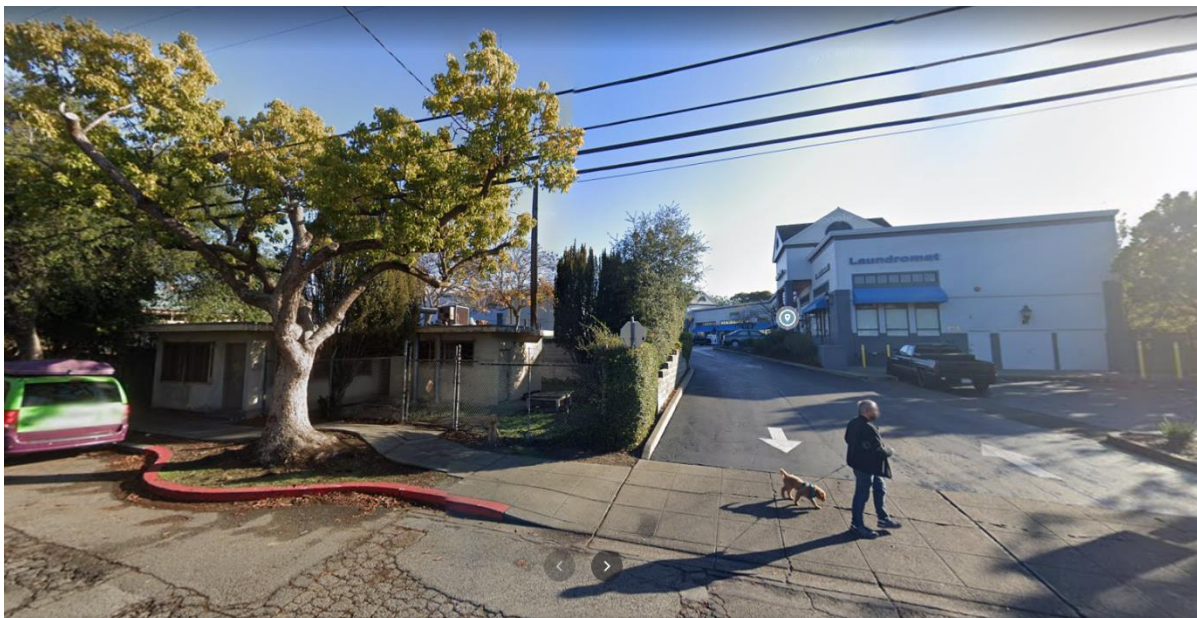


Figure 8 above shows Building 12, a sewage treatment building, to the left as it exists today. Behind Building 12 is generally where the Administration Building once stood, which has been replaced by a shopping center (Google Maps).



Figure 9 shows current urban development occupying the former parade ground and Administrative Core. The loss of this important site feature is not adequately addressed in the nomination, and the proposed district boundary simply ignores the loss of this feature.

3. Loss of Original Physical Setting and Feeling. The nomination also dismisses significant changes to the physical environment that significantly impairs the integrity of feeling and setting. The original site was a peninsula that was surrounded by water on three sides, which were important geographic features for the merchant marines' mission. However, the water on both the east and west side have been filled and now contain residential development and a public park.

Due to the demolition and redevelopment, including modifications to the geography of the site, the site has lost considerable integrity of design, materials, setting, feeling and association with its historic period of significance. Those structures that remain do not convey the special nature of the property's historic maritime training mission. An uninformed visitor to the area that was not aware of its history would not recognize this was part of a cohesive military campus, because so much has been changed in the remaining buildings, landscape, and circulation due to demolition, development and infill.

The figures below illustrate the differences in composition of the site between 1947 and the present.

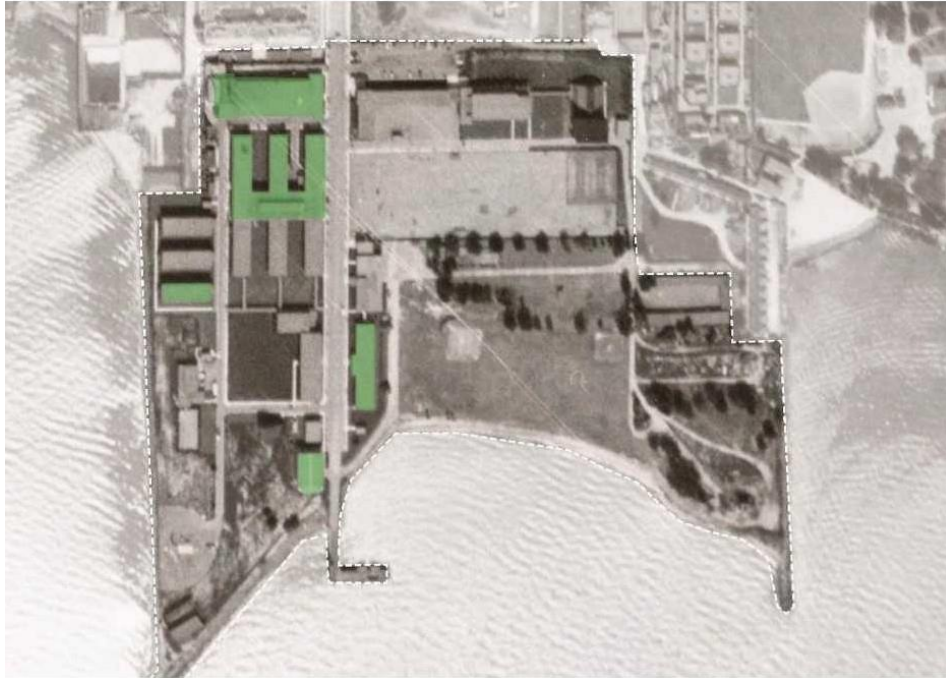


Figure 10. 1947 aerial photograph showing United States Maritime Service Officers School during its years of operation. The proposed district contributors are highlighted green. Approximate boundary of original site is indicated by a dashed white line. The Administration Building and parade ground is located in the upper right quadrant of the site. (Page & Turnbull).



Figure 11. Current aerial photograph showing location of United States Maritime Service Officers School with overlaid shading representing its condition during its years of operation. Approximate locations of previously demolished buildings and structures are shaded red. Proposed district contributors are highlighted green. The approximate boundary of the original site is indicated by dashed white line (Page & Turnbull).

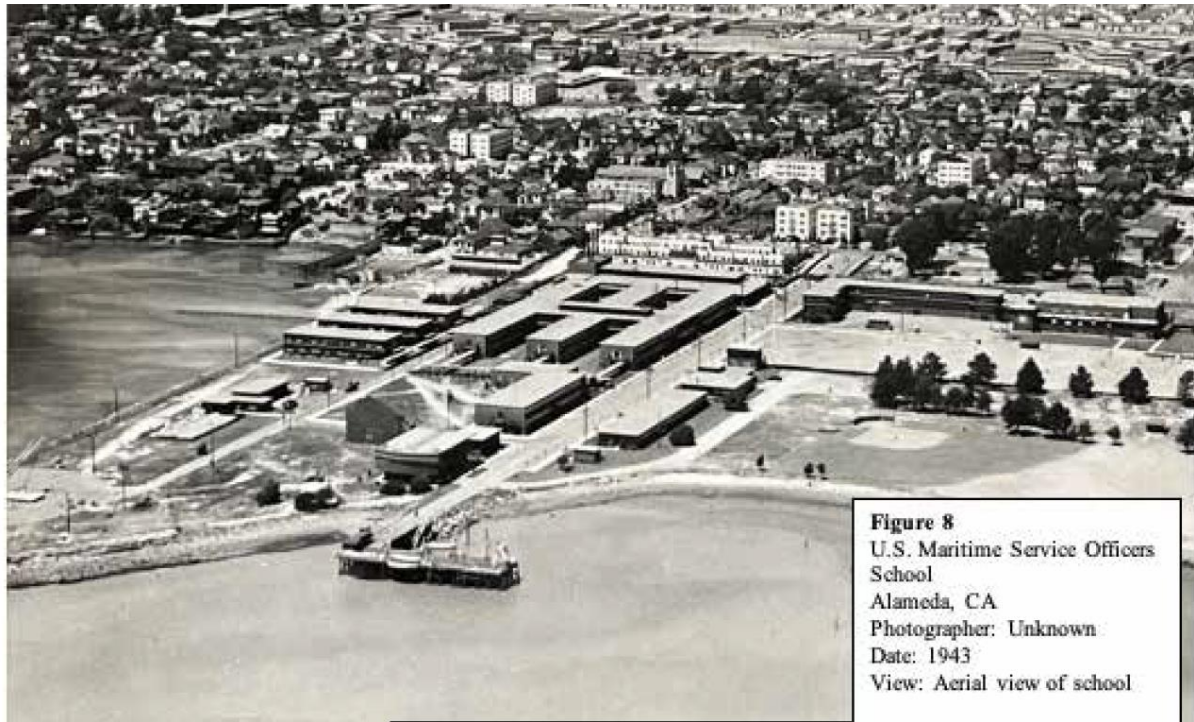


Figure 12 above shows the original peninsula that the campus resided on that was surrounded on three sides by water. The east and west shorelines have since been filled and developed with urban uses (May 26, 2022 Nomination).



Figure 13. The majority of the approximately 662 feet of the original western edge of the campus has been landfilled and developed with residential buildings shown in this photo (Google Maps).



Figure 14 shows an original image of the US Maritime Service Officers School with buildings on both sides of McKay Avenue. The majority of buildings to the right have been demolished (ianewatts.org).



Figure 15 above shows current aerial of the site of the US Maritime Service Officers Training School along McKay Avenue with apartments and shopping center to the east side of McKay and parking lot and vacant land to the west. Location where Figure 14 photo was taken is shown as the green arrow at bottom (Google Maps).

4. Inadequate Boundary Justification. The nomination does not provide an adequate boundary justification. The boundary proposed for the historic district appears arbitrary, because it excludes the important former administrative core which has since been redevelopment with civilian uses. The nomination states that over 50% of the original space of the former maritime school remains, however, this appears to be an arbitrary number. The proposed boundary focuses on public owned land including the portion of property designated for future homeless services, and leaves out more than 18 acres of the original site mostly owned by private property owners who could object to the nomination. The nomination boundary only refers to 13.5 acres of the original 32-acres of the campus. Eighteen of the existing buildings and structures and landscape features have been demolished over time, the existing parade grounds which was vital to the campus circulation has been infilled by apartment buildings, and the bay waters along the western and eastern shorelines that once outlined the peninsula has been filled in with apartments and park lands. The proposed historic district boundaries are significantly smaller than the original campus and are based solely on the current building configuration and not on the actual operations of the facility. In addition, the boundary justification in the nomination does not justify excluding Building No.12, the sewage treatment building, which currently exists on the east side of McKay Avenue adjacent to the nomination site. Furthermore, of the remaining buildings, half of those are accessory buildings unable to convey the significance of former uses on the site, including equipment and storage sheds. The nomination should be revised to clarify this misstatement. Therefore, the nomination fails to provide adequate justification to support why the proposed historic district does not include the entirety of the original site.

5. Alterations to Existing Buildings. The nomination states that the buildings on the site are all in their original condition, however, this statement is inaccurate as all of the buildings have been significantly modified and little of their original structure remains. The remaining buildings have been altered for new uses through replacement of original windows and doors, and addition of new entry elements such as stair cases, decks, and ramps. At Building 1 and 2, significant and comprehensive alterations have been completed at the south facades, which face the other proposed district contributors and San Francisco Bay. Alterations to the Infirmary, Building No. 7, and the Seamanship Building are not adequately acknowledged in the nomination.

- a. Building 1 was originally an elongated I-shaped building plan with an appendage at the west end. The south facing recessed bay, originally a dock similar to that on the north side, was infilled during the late-1980s with new laboratory support space. Other primary changes include the conversion of the original full height, clerestoried shop space to the current one-and-a-half story configuration, with subdivided laboratory space on the First Floor and a mechanical loft housing laboratory, ventilation and distillation equipment in the

Architectural elevation drawing of the front of the building at 11.07. The drawing shows a long, two-story structure with a flat roof. The ground floor features a series of large windows and doors, including a prominent entrance on the right. The upper floor has a long, narrow window. The drawing is labeled with various architectural details and dimensions.

Figure 17 above shows the current altered condition of the south elevation of Building 1, many original doors and windows throughout the building were replaced.

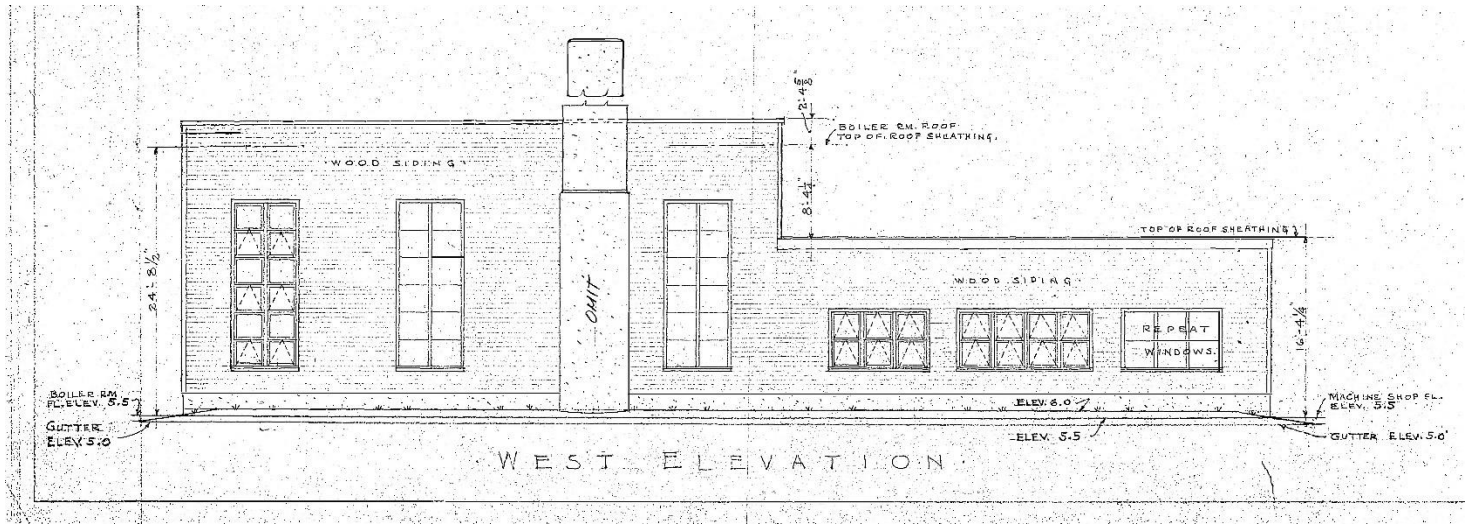


Figure 18 above shows the original west elevation of Building 1



Figure 19 above shows the current altered condition of the west elevation of Building 1, original windows were removed and filled in.

- b. The nomination fails to describe Building 2 as significantly altered and now just half of the original building. Significant alterations have been made to Building 2; original windows have been replaced with aluminum counterparts and the south façade of Building 2D was renovated to accommodate the addition of seismic bracing at its ground floor. Most notably, the three southern barracks wings, Buildings 2E, 2F, and 2G, were demolished in 2007 resulting in significant changes to the building footprint, site configuration and building appearance. The nomination fails to describe these alterations in detail and yet it describes the building as four individual buildings when it is really one structure with multiple wings. This presents a distortion to the building count in an attempt to show there are more surviving buildings than really exists. In addition, all windows and doors replaced, new entrance staircases added, and the east façade of 2A was rebuilt following the Bureau of Indian Affairs bombing in 1975.



Figure 20 above shows the current altered condition of Building 2 where the three wings (2E, 2F, 2G) on the south elevation were demolished.

- B. Information Contained in the May 26, 2022 Nomination is Not New:

The nomination does not include substantial new information that would inform a finding of significance or integrity different from that of previous. There is no substantive reason to revisit the evaluation from a content perspective.

On June 3, 2022, the City, a Certified Local Government (CLG), received a notice that the Nomination of the U.S. Maritime Service Officers Training School to the NRHP would be considered at the August 5, 2022 State Historical Resources Commission meeting. The notice stated that the revised nomination (available online at: https://ohp.parks.ca.gov/?page_id=24368, dated May 26, 2022) represents a new request for City review, however, the City finds that the revisions do not substantially change the nomination. The revised nomination includes the same information that was considered by the City in 2021.

In 2021, the HAB and the City Council considered whether the site was historically significant and whether it was eligible for inclusion for the NRHP, California Register and local Alameda Historic Monument designation. The HAB held two public hearings on March 4, 2021 and May 6, 2021, and the City Council held its public hearing on July 6, 2021. Both the HAB and the City Council determined the US Maritime Service Officers School ineligible for inclusion on any the NRHP due to loss of integrity.

The City made the following finding in the May 6 decision after extensive evaluation including analysis from Page & Turnbull in 1996 and 2021:

“Based on the lack of integrity of the original Maritime Service Officers School campus as a whole and the lack of individual integrity of each of the buildings, they are not eligible for listing on the National Register.” (Page 2 of HAB Resolution No. HAB-21-01).

The City submitted a letter on April 26, 2022 from the Mayor opposing the nomination, and invoking 54 U.S.C. Section 302504(c)(2), which mandates SHRC to take no further action on the nomination if both the CLG and chief local elected official recommend that a property not be nominated to the NRHP.

As described below, the nomination purports to provide new district boundaries, period of significance, contributing elements, and photographs. However, as discussed below, the nomination does not include substantial changes or new information of substantial importance which would require additional City review.

1. District Boundary: The nomination asserts that the district boundaries are new information that was not analyzed by the City in 2021, however, the nomination boundaries were part of the public record and considered in 2021 when the HAB determined the US Maritime Service Officers School should not be nominated to the NRHP. The 1996 nomination, which is part of the public record considered by the HAB and City Council, includes this statement: “This evaluation applies to all surviving features of the Maritime Service Officers School, whether on G.S.A property or State Park property, when considered as a district. In other words, all surviving features are ineligible

as a district.” (Section 8 Statement of Significance 1996 Nomination analysis in Supporting Documents).

Since the end of the periods of significance have resulted in a substantial loss of integrity, a loss of integrity of design, setting, materials, feeling, and association renders the property ineligible for the NRHP. This evaluation applies to all surviving features of the Maritime Service Officers School, whether on G.S.A. property or State Park property, when considered as a district. It also applies to each surviving feature on G.S.A. property only, considered individually. In other words, all surviving features are ineligible as a district and all surviving features on G.S.A. property are individually ineligible, but the two surviving buildings on State Park property (the infirmary and the seamanship building) have not been addressed in this evaluation as individual properties.

Figure 21 above shows text from 1996 Nomination analysis in Supporting Documents considered by the City in 2021 as part of evaluating the entire for historical significance and NRHP eligibility. (Page & Turnbull).

2. Period of Significance: The nomination asserts that the period of significance 1942 to 1953 is new information, however, the 1996 evaluation of the property, which was part of the public record and considered when the HAB determined the US Maritime Service Officers School not eligible for the NRHP in 2021, included consideration of the Korean War period:

“It appears to possess significance under both criteria A and C for the period 1943 to 1945 (World War II). It may also possess exceptional significance for the additional period from 1950 to 1953 (The Korean War) under criterion A and criteria consideration G (for properties less than 50 years old). However, extensive modifications to the whole complex and to each individual building (on G.S.A property) since the end of the periods of significance have resulted in substantial loss of integrity.” (Section 8 Statement of Significance 1996 Nomination analysis in Supporting Documents).

Furthermore, the current nomination simply states that the site’s period of significance extends through the Korean war, but does not provide substantial information or other justification additional to that included in previous evaluations. The nomination does not identify any features of the buildings or the site that are specifically associated with its use during the Korean War, which convey the significance of the site during that period, or that those remaining features retain sufficient integrity.

School, Alameda does not appear eligible for the National Register of Historic Places (NRHP) because of a lack of integrity. It appears to possess significance under both criteria A and C for the period 1943 to 1945 (World War II). It may also possess exceptional significance for the additional period from 1950 to 1953 (The Korean War) under criterion A and criteria consideration G (for properties less than 50 years old). However, extensive modifications to the whole complex and to each individual building (on G.S.A. property) since the end of the periods of significance have resulted in a substantial loss of integrity. A loss of integrity of design, setting, materi-

Figure 22 above shows text from 1996 Nomination analysis in Supporting Documents describing the period of significance including the Korean War. (Page & Turnbull).

3. Contributing Elements: The nomination lists inclusion of the War Memorial within the district as new information not considered by the City in 2021, however, the War Memorial was discussed in the 1996 evaluation, which was part of the public record and considered in 2021 when the HAB determined the US Maritime Service Officers School is not eligible to be nominated to the NRHP (Section 7, Page 4 of the 1996 Nomination document). Further, the War Memorial is a commemoration of the facility's contribution and is not connected architecturally or to the use and operation of the school.

4. Photographs: The nomination contains historic photos not considered by the City in 2021. These photographs depict the same buildings and features of the site that were extensively reviewed and considered by the City in 2021, and in the 1996 evaluation. These photographs contribute to an understanding of the site's significance as found by previous evaluations. However, they do not address the reasons for the finding of ineligibility, which were based on the site's integrity. It is important to note that the nomination does not contain any current photos of the site that would otherwise show that the remaining structures have lost significant integrity through demolition and modifications.

C. The Nomination Incorrectly Associates the Work of "Master" Architects

The nomination asserts that there is new information associating master architects with the design of the buildings. However, this information is not new. The question of architects associated with the site was studied as part of the public record in 2021. Research regarding this site, conducted by Page and Turnbull on behalf of the City in 2021, does not support the nomination's assertion that extant buildings at the site were designed by architects Harry Bruno and Joseph Esherick. It is also important to note that the existing campus does not retain sufficient integrity to effectively convey its significance whether or not the Coast Guard Engineers, Harry Bruno, or Joseph Esherick were the architects of the facility.

1. Listing of Architects. The nomination incorrectly attributes the design of the US Maritime Service Officers School to architects Harry Bruno and Joseph Esherick. A review of the original drawings in the collection of the Alameda Museum indicates that the buildings were designed by US Coast Guard Engineers with Harry Bruno serving as Supervising Architect, or site architect. This role is substantiated by the resume for Harry Bruno included in the revised nomination, which lists this role as part of Bruno's employment history but does not list the US Maritime Service Officers School, Alameda as among the architect's original designs. Previous analysis found that "The school was designed in 1942 by US Coast Guard engineers and constructed in 1942-43 on a 32-acre site by the Fred J Early, Jr. Co. of San Francisco." (Section 8 Statement of Significance 1996 Nomination analysis in Supporting Documents). The nomination should be revised to accurately attribute the design of the buildings to the US Coast Guard Engineering Headquarters. Otherwise, if the intent is to list all architects, designers, and building professionals involved in the facility's design and construction, the nomination should also

include the names of all contractors listed on original drawings in addition to the US Coast Guard Engineering Headquarters.

CHIEF ENGINEERING OFFICER			
BUILDING FOR WAR SHIPPING ADMINISTRATION			
APPROVED <i>J. J. Knight</i>			
DIRECTOR OF DIVISION OF TRAINING			
REVISION	DESCRIPTION	BY	DATE
	UNIT MERCHANT MARINE TRAINING STATION NEPTUNE BEACH-ALAMEDA, CALIF.	DRAWN <i>J.R.B.</i>	
	TITLE: BOAT HOUSE PLANS	CHECKED <i>E.M.K.</i>	
	UNITED STATES COAST GUARD ENGINEERING HEADQUARTERS WASHINGTON, D.C.	APPRVD.	
		SCALE: $\frac{1}{8}'' = 1'-0''$	
		DATE: <i>MARCH 24 '43</i>	
SUBMITTED <i>E.F.W.</i>	APPROVED: <i>[Signature]</i>	SHEET <i>2</i> OF <i>12</i>	
[Signature] [Signature] [Signature]		DRAWING No. <i>102037</i>	

Figure 23 above. Example of title block, "Barracks Bldg. is First Floor Plan," drawing set for the United States Maritime Service Officers School, collection of the Alameda Museum (Photographed by Page & Turnbull).

1	NOTES AND DIMENSIONS	Scale 1/8" = 1'-0"
REVISION	Frank B. Otto 10-12-42	
BUILDINGS FOR WAR SHIPPING ADMINISTRATION APPROVED BY <i>J. H. T. Wright</i> DIRECTOR OF DIVISION OF TRAINING		
UNIT	DESCRIPTION	BY DATE APPROVED
MERCHANT MARINE TRAINING STATION	NEPTUNE BEACH-ALAMEDA-CALIF.	DRAWN EBF-JDK
TITLE: ENGINEERING BLDG.	ELEVATIONS & SECTION.	TRACED EBF.
UNITED STATES COAST GUARD		CHECKED J.R.A.
ENGINEERING		APPRVD.
HEADQUARTERS WASHINGTON, D.C.		SCALE 1/8" = 1'-0"
SUBMITTED	APPROVED	DATE 10-10-42
<i>J. S. Lee</i>	<i>J. S. Lee</i>	SHEET 20 / OF 43
LT. COM'DR. USCG	CAPT. CHIEF OF SECT.	DRAWING NO. 101997
REAR ADMIRAL USCG ENGR. IN CHIEF		

Figure 24 above. Example of title block, "Engineering Bldg. Elevations & Section," drawing set for the United States Maritime Service Officers School, collection of the Alameda Museum (Page & Turnbull).

2. Harry Bruno Did Not Design the Buildings. Harry A. Bruno is listed on the cover sheet of the blueprint set as the "site architect" overseeing the local general contracting firm, the Fred J. Early Jr. Co., which was contracted to build the facility. Harry Bruno was not a master architect at the time and his contributions to this project occurred before he obtained his license to practice. Harry Bruno did not contribute to the design of the facility and had no profound effect on any of his future work. The drawing list for the set of blueprints identifies that revised architectural and mechanical drawings were based on original drawings prepared by the U.S. Coast Guard Engineering Headquarters.

Harry Bruno's name appears on only one revised drawing, Sheet 34A dated July 1943 (Figure 26). The information provided in the blueprint title blocks suggests that Bruno served in the capacity of a consulting architect for the Fred J. Early Jr. Co. during construction of the buildings, but did not personally design the buildings.

MERCHANT MARINE TRAINING STATION		
NEPTUNE BEACH		ALAMEDA, CALIF.
DATE 14 July 43	REFERENCE SHEET NO. OF DATED	REVISION NO. 34A
APPROVED:	<i>[Signature]</i>	
	OFFICER IN CHARGE OF CONSTRUCTION	
BY DIRECTION:		
DATE	LIEUT. U. S. C. G. R.	
FRED · J · EARLY · JR · CO ·		
HARRY · A · BRUNO		
Architect		
4875 HARBORD DR.		
OAKLAND CAL.		

Collection of Alameda Museum

Figure 26 above. Example of title block from Revision No. 34A, drawing set for the United States Maritime Service Officers School, collection of the Alameda Museum (Page & Turnbull).

Within the full set of architectural drawings there is only one page which has been signed by Harry Bruno which is the sole blueprint showing one exterior modifications. Even in the set of possible Bruno revisions there is reference that those designs were “traced from drawings received from Washington 1/8/43 from Mr. Frank Otto.”

REVISED 2/23/43 - PLUMB. FIXTURES
 TRACED FROM DRAWING RECEIVED
 FROM WASHINGTON 1/8/43 FROM MR FRANK OTTO

REVISED • PLAN INFIRMARY • BLDG		
MERCHANT MARINE TRAINING STATION		
NEPTUNE BEACH		ALAMEDA, CALIF.
DATE 1/9/43	REFERENCE SHEET NO. 1 OF 3 DATED 11/26/42	REVISION NO. 34
APPROVED:		
BY DIRECTION: <i>[Signature]</i> DATE 1/9/43		
OFFICER IN CHARGE OF CONSTRUCTION U.S. C. G. R.		
FRED • J • EARLY • JR • CO •		

Figure 27 above shows credit for drawings within Revision 34 is given to "Traced from Drawing Received from Washington 1/8/43 From Mr. Frank Otto" (Page & Turnbull).

1. Overall statements and evidence provided in the nomination require in-depth fact-checking. For instance, the Pacific Coast Architectural Database (PCAD) source cited in support of an attribution of the building design to Harry Bruno is based on inaccurate information supplied to PCAD in 2022 by the applicant (<https://pcad.lib.washington.edu/person/8887/>). The PCAD website credits Carmen Reid, the nomination applicant, for providing the research on Harry Bruno.



Figure 28 above shows the credit to Ms. Reid on the PCAD website for information cited in the nomination (pcad.lib.washington.edu).

3. Joseph Esherick Designed a Boiler Room Addition. The nomination incorrectly lists Joseph Esherick as an architect for the existing district. Shortly after the end of World War II, Joseph Esherick designed a small rectangular boiler room addition at the northwest corner of Building 1. The boiler room addition was removed by 1977. No extant buildings or significant design features of the site can be attributed to Joseph Esherick. Although the small addition that Joseph Esherick designed for Building 1 has been removed, the nomination continues to reference his name as a renowned architect that has made significant contributions to the design of the facility. This attribution should be revised to accurately state that Esherick designed one addition, which was not influential in the development of the site's design or operation, and which is not extant.

Figure 29 above. Detail from 1965 aerial photograph showing Building 1. Black arrow indicates boiler room addition designed by Joseph Esherick in 1946. The boiler room has been demolished. (Page & Turnbull).

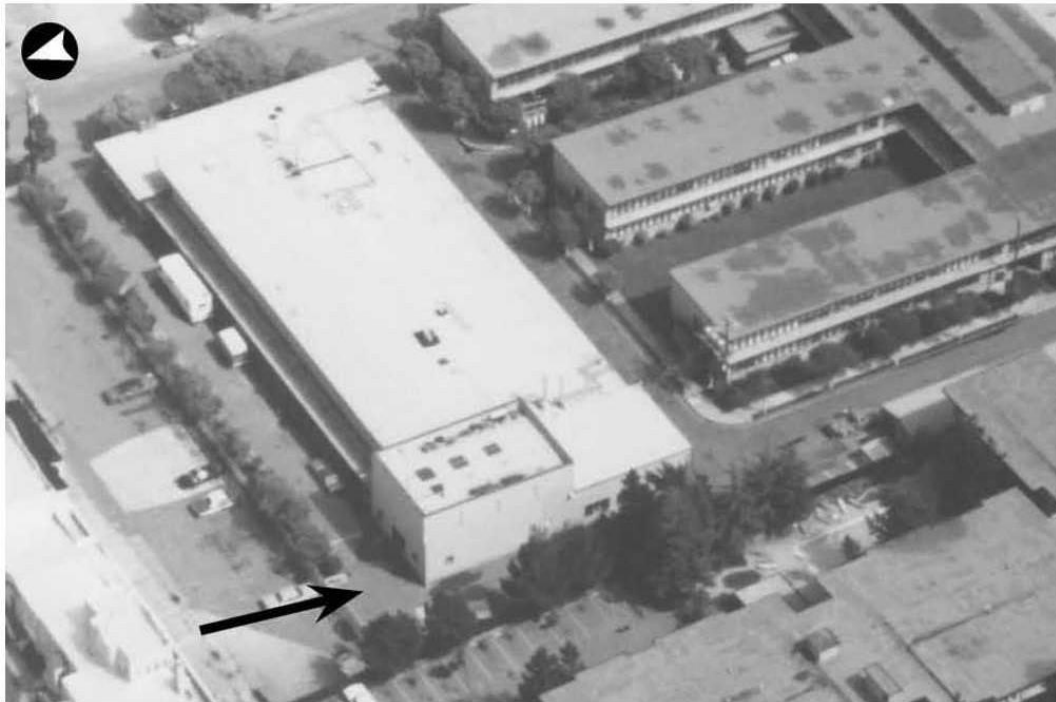


Figure 30. Detail from ca. 1977 aerial photograph showing Building 1. Black arrow indicates former location of boiler room addition designed by Joseph Esherick in 1946. The boiler room has been demolished. (Page & Turnbull).

D. Additional Concerns with the Nomination:

The following is a list of additional concerns identified by the City which are not discussed within the categories above:

1. The nomination doesn't adequately consider other US Maritime Service training facilities such as Kings Point, New York.
2. Two property owners – East Bay Regional Park District and the GSA submitted letters of opposition to the listing.
3. The nomination does not properly cite the sources of photos included as exhibits. Figure 4 in the nomination notes that the photographer is unknown however this figure is originally from Page & Turnbull's 1996 document titled "Supporting Materials, Determination of Eligibility, National Register of Historic Places, Alameda Federal Center, Alameda, CA."

CONCLUSION:

The nomination fails to adequately address the loss of integrity of the US Maritime Service Officers Training School that has been documented extensively documented by Page & Turnbull and GSA, and concurred with by a previous SHPO and the City. In order to meet criteria for the NRHP the site must have both significance and integrity, however, the integrity of the nominated site has been compromised through demolition and alteration of buildings and site features, and the facility no longer retains the integrity necessary to convey its significance.

The US Maritime Service Officer's School, Alameda was built on a 32-acre site and consisted of a complex of more than 25 buildings connected by landscape and circulation features which were integral to its function as a campus. Eighteen (18) of the existing buildings and structures and landscape features have been demolished over time, the existing parade grounds which were vital to the campus circulation has been infilled by apartment buildings, and the bay waters along the western and eastern shorelines that once formed the peninsula of the campus has been filled in with apartments and park lands. Due to the extensive loss of integrity, the site does not appear to be eligible for listing in the NRHP. The current nomination does not adequately address the previous evaluations findings regarding integrity.

Despite SHPO describing this as a “new” nomination, none of the purported revisions or new information provided in the nomination constitute substantive changes to the record that previous evaluators and reviewers relied upon to find the subject site ineligible for NRHP listing. Instead, substantial evidence continues to demonstrate that the majority of the campus has been demolished and modified to the point that the remnants cannot physically convey its significance as a historic district.

Both the CLG and the chief local elected official have recommended that the site not be nominated to the NRHP. Therefore, the City requests that SHPO and the SHRC take no further action on the nomination as required by 54 U.S.C. Section 302504(c)(2).

REFERENCES:

1. Reid, Carmen. National Register of Historic Places Form – United States Maritime Service Officers School, Alameda, 2022
2. City of Alameda McKay Certificate of Approval PLN20-0431 Public Record: <https://www.alamedaca.gov/Departments/Planning-Building-and-Transportation/Planning-Division/Major-Planning-Projects>
3. Page & Turnbull. “National Register of Historic Places Nomination – United States Maritime Service Officers School, Alameda”, 2022.
4. “U.S. Maritime Service Officer Training School Alameda, California (1943-1954).” American Merchant Marine at War. <http://www.usmm.org/alameda.html>
5. “Richmond P. B. Hobson”. Watts, Ian, Ph.D. Historian on the U.S. Merchant Marines, <https://ianewatts.org/richmond-p-b-hobson-photos/>
6. City of Alameda Historical Advisory Board Resolution No. HAB-21-01, 2021
7. Page and Turnbull, “Supporting Materials, Determination of Eligibility, National Register of Historic Places, Alameda Federal Center, Alameda, CA.” San Francisco: 1996.

8. Pacific Coast Architecture Database, "Harold Alexander Bruno (Architect)",
<https://pcad.lib.washington.edu/person/8887/>

Prepared By:

City of Alameda Planning Division

Allen Tai, AICP City Planner

Henry Dong, Planner III