



March 4, 2021

(By electronic transmission)
Historical Advisory Board
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Subject: Proposed delisting of 620 Central Avenue (originally the U.S. Maritime Officers Training School) from the Historic Building Study List (HBSL) - - (Item 7-A on Historical Advisory Board's March 4, 2021 Agenda)

Dear Boardmembers:

The staff report is recommending approval of this delisting based primarily on a 2003 determination by the State Office Of Historic Preservation that the subject property is not eligible for inclusion in the National Register of Historic Places because it has lost its historic integrity and sense of association. The 2003 determination was primarily based on demolition of many of the important buildings that once constituted the complex during its period of significance associated with World War II and beginning with its 1942 construction when it served as the Maritime Officers Training School.

However, eligibility for the Historic Building Study List (HBSL) is not dependent upon National Register eligibility. HBSL properties can also be listed based on local significance. In addition, the materials included with the staff report do not provide information that is necessary to determine whether the property meets the HBSL criteria, including the significance of the surviving buildings with regard to the Maritime Officers Training School and the level of significance of the buildings proposed to be demolished.

Related to this, there appears to be extensive additional documentation of the significance of the complex, including a 1996 report from historic preservation consultants Page and Turnbull apparently supporting determination of eligibility for the National Register as well as a 1996 historic building preservation plan prepared by Page and Turnbull. The Alameda Point Collaborative has also recently located original plans and other documents that, among other things, show the complex's original layout and lists of the original buildings and their functions.

The Page and Turnbull reports were attached to the 2003 letter from Arthur Layne to the State Historic Preservation Officer included in the HAB packet, but for some reason the Page and Turnbull reports were not included in the packet.

In addition, the 2018 research by First Carbon Solutions and incorporated into the Mitigated Negative Declaration prepared for the Alameda Point Collaborative McKay Wellness Center project is flawed because it only evaluated the property according to the National Register criteria rather than the HBSL criteria.

Also, since the 1996 Page and Turnbull reports are 25 years old, even if they can be procured their analysis will need to be updated to reflect significant demolition of Maritime Officers Training School buildings since 1996 and the increased scarcity of World War II era complexes of this type since 1996.

The Alameda Architectural Preservation Society (AAPS) therefore recommends that the HAB defer its consideration of the proposed delisting until adequate documentation is made available to allow the HAB to make its decision on the proposed delisting.

Thank you for the opportunity to comment. Please contact me at (510) 523-0411 or cbuckleyaicp@att.net if you would like to discuss these comments.

Sincerely,

Christopher Buckley, Chair
Preservation Action Committee
Alameda Architectural Preservation Society

By electronic transmission:

cc: Allen Tai and Andrew Thomas - - Planning, Building and Transportation Department
Mayor and Councilmembers
AAPS Board and Preservation Action Committee