

At the May 6, 2021 Historical Advisory Board (“HAB”) meeting, Agenda Item 7-A provided in pertinent part: “Delisting from Historical Building Study List and Certificate of Approval - 620 Central Avenue - Alameda Federal Center. Applicant: Alameda Point Collaborative. Public hearing to consider delisting the Alameda Federal Center site at 620 Central Avenue from the Historical Building Study List. In addition, the applicant requests a Certificate of Approval to demolish two main buildings and four accessory structures on the project site.”

[City of Alameda - File #: 2021-907 \(legistar.com\)](#)

The HAB took two votes. They voted to deny the delisting from the Historical Building Study List and then voted to grant the Certificate of Approval to demolish.

We hereby call for review of the HAB’s vote granting of the Certificate of Approval. We support the HAB’s vote to deny the delisting and are not calling for review of that vote.

While the hearing on the Call for Review may include and consider reasons not listed below, the Call for Review is based on the following reasons or justifications, which we believe are sufficient to deny the Certificate of Approval to demolish and thus that vote by the HAB should be reversed.

1. Alameda Municipal Code provides at **13-21.5 - Procedure for Preservation of Historical and Cultural Monuments, b.2: Demolition**. The Historical Advisory Board shall determine whether to issue a certificate of approval for demolition, with or without conditions of approval, based on whether it finds that the Historical Monument no longer meets the criteria therefore, or has become a detriment to the community and that the condition making it a detriment cannot readily be cured.

[ARTICLE VII. - HISTORICAL PRESERVATION | Code of Ordinances | Alameda, CA | Municode Library](#)

Here, the HAB, after lengthy discussion, voted not to delist the subject property, and found that it meets the criteria to remain on the list. The HAB made no finding that the property had “become a detriment to the community and that the condition making it a detriment cannot readily be cured.” In fact, there was no discussion of the property being a detriment to the community. Thus, per Alameda Municipal Code, the HAB’s vote to issue the certificate for approval to demolish was in error and must be reversed.

Additionally, the draft Resolution attached to the Agenda Item does not accurately reflect the HAB’s votes.

2. The ballot language and supporting arguments from the Special Election Measure A in 2019 only speak to “reuse” of the federal buildings, not demolition:

Shall an ordinance confirming the City Council’s actions to permit reuse of vacant federal buildings on a 3.65-acre parcel on McKay Avenue and allow for the development of a wellness center for senior assisted living and supportive services

for homeless individuals by changing the General Plan designation from “Federal Facilities” to “Office,” removing the Government Combining District classification and maintaining the existing zoning district designation, be adopted?

The official ballot argument, signed by Applicant Doug Biggs, Mayor Marilyn Ezzy Ashcraft, Councilmember John Knox-White, et al., clearly provides that Measure A “takes advantage of an incredible opportunity to save money by using existing buildings on surplus government land.”

Thus, the voters did not vote to demolish the subject property and Applicant’s request to demolish should be denied as it conflicts with and contradicts the voters’ intent, and to not reverse the HAB’s decision would be a flagrant abuse of the public trust.

3. The subject property has been nominated for inclusion on the National Register of Historic Places, including new research since the 1996 report was prepared. The recent decision by the Historical Advisory Board confirms that the property retains eligibility for the California Register of Historic Places with an "S" (State) designation. It is appropriate to allow that process to be completed by National Park Service before approving demolition of the buildings, which would be irreparable.
4. The existing buildings are the last remaining WWII era structures for Merchant Marine training in the United States. For example, the other WWII era structures at Coyote Point, Sheephead’s Bay and Fort Trumbull have been demolished.

The US Maritime Service Officers School was built in Alameda in 1942 and has major historical importance both to Alameda and to the entire nation. It was one of the only two Officers Schools for the Merchant Marines established in the nation at the outbreak of WW2 and the only one whose buildings were actually built during the war. The official opening ceremony for the school was broadcasted live on the radio to the nation and by short-wave radio to the troops overseas. It trained over 6,500 officers, a number of whom died in the war. The Merchant Marine service was essential to transport the supplies without which the war could not have been won. Their vessels sailed in mined waters, were frequently torpedoed and attacked by enemy aircraft. They are estimated to have suffered the highest percentage casualty loss of any of the services during the war.

Unfortunately, after WWII, the Merchant Marines became the forgotten service and they were denied veteran status, were denied all benefits under the GI bill and denied all medical care in Veterans Administration hospitals. It was not until 2020, a full 75 years after the war, that the bravery and heroism of the Merchant Marines was finally officially acknowledged when they were granted the Congressional Gold Medal for their efforts and sacrifices in WWII. Sadly, instead of acknowledging and honoring Alameda’s pivotal role training Merchant Marine officers for the war, the rare and historic buildings of the former Officers School in Alameda have now been approved for demolition. These are the last remaining WWII era structures specific to training the United States Merchant Marines.

5. The American Merchant Marines Veterans national organization circulated a petition to support keeping the buildings and not demolishing them that gathered 1000+ signatures, including over 250 resident supporters from Alameda.
6. Economic value of the property can be tied to local tourism related to WWII historic sites including the USS Hornet, Alameda Naval Museum, Rosie the Riveter and the Liberty Ship SS Jeremiah O'Brien.
7. An argument for demolition of the remaining buildings of the former Maritime Service Officers School buildings is that they have lost architectural integrity due to subsequent modifications when these buildings were later used by various government agencies for offices and laboratories. A 1996 architectural evaluation notes modifications such as a change of exterior paint color, replacement of windows and exterior staircases and interior subdivisions. However, the architectural integrity can be restored because all of these modifications are remediable. The buildings can be repainted the original color, windows and exterior staircases can be replaced to more resemble the originals and interior subdivisions can be removed.
8. Contrary to the draft Resolution that CEQA is not required, that is inconsistent with CEQA guidelines.

The draft Resolution provides in pertinent part:

NOW, THEREFORE, BE IT RESOLVED, in December 2018, the City Council by Resolution No. 15461 adopted a Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) in compliance with CEQA for the McKay Wellness Center (Alameda Federal Center Reuse Project). In accordance with Section 15164 of the CEQA Guidelines, an Addendum to the Mitigated Negative Declaration has been prepared in the manner required and as authorized under CEQA, and the Historical Advisory Board has considered the MND, MMRP and Addendum, all of which are incorporated by reference as though fully set forth herein, prior to making a decision to delist the subject property from the Historical Building Study List. The Historical Advisory Board finds and determines that approval of the Certificate of Approval application does not raise important new issues about the potentially significant impacts on the environment that have not been previously disclosed in the MND and no further environmental review is required;

However, since the property is listed in a local register of historic resources, it is considered an historical resource for the purposes of CEQA. (Historical Resources, Type 3: Section 15064.5(a)(3) of the CEQA Guidelines.)

(a) For purposes of this section, the term "historical resources" shall include the following: (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 14 CCR, Section 4850 et seq.).(2) A resource included in a local register of historical resources, as defined in section

5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, §5024.1, Title 14 CCR, Section 14 CCR, Section 4852) including the following: (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;(B) Is associated with the lives of persons important in our past;(C) 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) Has yielded, or may be likely to yield, information important in prehistory or history.

The Definition of a Historical Resource Under CEQA:

According to section 21084.1, a "historical resource" is "a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section."

Thus, since the HAB did not delist the site, CEQA applies and is required.

9. Correspondence dated March 5, 2021, with a Principal at Page and Turnbull and a member of the public, indicated the possibility of seeking an Adaptive Reuse Feasibility Study. That study was never done.

Email from Ruth Todd, Principal, Page and Turnbull:

“There is a large building at this address, I think, and it would be great if the applicant could consider its reuse- it looks like it might have a flexible footprint that might allow for feasible reuse. An adaptive reuse feasibility study may be a good next step to suggest to the HAB or the developer, prior to approving a demolition permit.”