

September 23, 2015

Ms. Meenaxi Panakkal
Planning Division
200 E. Santa Clara Street
Tower, 3rd Floor
San Jose, California 95113

Subject: Peer Review of a Historic Resources Evaluation and Impacts Assessment for Greylands Mansion for the City of San Jose, Santa Clara County, California (LSA Project No. SJO1501)

Dear Ms. Panakkal:

LSA Associates, Inc. (LSA) is under contract to provide a peer review of the Historic Report and Proposed Project Analysis prepared by Page & Turnbull (P&T) for 2055 East Hamilton Avenue (Greylands Mansion), San Jose, California. LSA architectural historian Eugene Heck, M.A., reviewed the methodology and findings of the 2015 report and analysis, which essentially consists of State of California Department of Parks and Recreation (DPR) forms, for compliance with the California Environmental Quality Act (CEQA) and best professional practices. In addition, Mr. Heck reviewed the discussion regarding project impacts for compliance with relevant *Secretary of the Interior's Standards for the Treatment of Historic Properties*, which are typically used to mitigate impacts to a level that is less than significant.

Following is a summary of LSA's comments, which are listed in more detail in the attached comment matrix.

LSA agrees that Greylands Mansion is historically significant under the California Register of Historical Resources (CRHR) Criterion 3 and the City of San Jose local ordinance, but disagrees with the finding that it is significant under CRHR Criterion 2. Based on its eligibility under Criterion 3 and the local ordinance, it is a "historical resource" as defined by CEQA and potential project impacts to it must be analyzed.

CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." Compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOIS) typically results in a project finding of less than significant impact with regard to historical resources.

The 2015 report concludes that although the project does not meet all of the SOIS, it will not result in a substantial adverse change to the historical resource. LSA disagrees with this finding. The size, scale, and proportion of adjacent industrial buildings and the canopy framework, which includes prominent signage and surrounds the mansion on three sides, will further erode the historic spatial relationships that characterize the property and have a cumulative visual effect that will cause a substantial adverse change in the significance of the resource.

If you have any questions, please contact Gene Heck at Eugene.Heck@lsa-assoc.com or by telephone at (951) 781-9310.

Sincerely,

LSA ASSOCIATES, INC.

A handwritten signature in blue ink that reads "Casey Tibbet". The signature is written in a cursive, flowing style.

Casey Tibbet, M.A.
Senior Cultural Resources Manager
Historian/Architectural Historian

Attachment: Comments Matrix

Lloyd House/Greylands Mansion Comments Table

Prepared by: Eugene Heck, M. A.

No.	Ch.	Page/Paragraph No. or other Designation	Reviewer Comments
1		Overall	The Historic Report and Proposed Project Analysis prepared by Page & Turnbull (P&T) for 2055 E. Hamilton Avenue, San Jose, CA is a document for California Environmental Quality Act (CEQA) only review. These comments will focus upon the 18-page "Part 2 eBay Main Street Building Proposed Project Analysis".
2		page 11	The Proposed Project Description is essential to the study and belongs at the beginning of the report. See comment No. 6.
3			The study prepared by P&T fails to define the Project Area limits. This is essential and required.
4			The study prepared by P&T fails to provide a Project Area limits (PAL) map, drawn to scale, with historical resources within the PAL assigned a map reference number. A legend and a north arrow are required.
5		page 2, Methodology	Has a records search for archaeological or built-environment historic resources in the vicinity of the Project Area limits been done? Has Native American consultation been initiated or has the City done scoping for this proposed project?
6		general	The definition of the Project Area must consider factors such as equipment storage and staging areas during construction; ingress and egress for equipment; utility relocations, etc.
7		page 3	This reviewer agrees that the building appears to be individually eligible for listing under Criterion 3 (Architecture) and that it appears to meet the City of San Jose Evaluation Criteria (The Tally); therefore the building appears to be a historical resource according to CEQA guidelines.
8		pages 4-7	Figures 3-11 show the building retains the aspects of integrity most needed to convey its significance under Criterion 3 (Architecture): integrity of materials, workmanship and design.
9		page 8	The seventh bullet-point in the list of character-defining features (CDFs) must be deleted. Interior spaces are not visible from the public right-of-way.
10		page 8	The gambrel end chimney should be added to the list of CDFs for the Dutch Colonial Revival style.
11		page 8	The period of significance should be 1927, the date of construction. Eligibility under Criterion 2 (Persons) has not been adequately documented by this study. The family is locally prominent but there is not enough information presented about either Dorothy Ainsley Lloyd or her husband William N. Lloyd to determine whether their activities or contributions were historically important. If the significance of these individuals were to be adequately documented by substantial evidence, the period of significance would be 1927-1982.
12		page 10	Category 3 is correct.

Lloyd House/Greylands Mansion Comments Table

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No.	Ch.	Page/Paragraph No. or other Designation	Reviewer Comments
13		page 12	The <i>Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings</i> is the correct citation for the authority. Please edit.
14		pages 13-15	This reviewer agrees that the proposed project is a Rehabilitation Treatment, as set forth in the Standards and Guidelines. Since the Standards and Guidelines are advisory, not regulatory or statutory, it is better to say, e.g. "... the proposed project <i>adheres to</i> Standard 1 for Rehabilitation" rather than "... the proposed project <i>is in compliance with</i> Standard 1." Please edit all instances accordingly.
15		page 13	This reviewer disagrees with the conclusion which follows the Discussion. Because the spatial relationships that characterize the property will be altered substantially by the construction of the open-frame structure one foot from the house's eastern one-story wing and the Main Street Building's entry vestibule will be approximately 14 feet from the northeast corner of the historic house the house will no longer be read from the street as a stately, 1927 mansion. It will be perceived as a tiny element dwarfed by a looming outdoor industrial plaza and pavilion.
16		page 14	The change from Single-Family Residence to 1-3 Story Commercial Building, which occurred circa 1987, may be significant within the context of High Tech in Silicon Valley 1980-2000, if that historic context were to be researched. Criteria Exception G would apply.
17		pages 15-16	This reviewer agrees with the conclusion that the proposed new construction will destroy historic spatial relationships that characterize the property. However, the Cumulative Impacts analysis is arbitrary and capricious. The size, scale and proportion of adjacent industrial buildings will have a devastating cumulative visual effect. The building will be unable to convey its 1927 historic significance.
18		page 18	The current study is sufficient to conclude that the former residence at 2055 E. Hamilton Avenue should be considered a historic resource for the purposes of CEQA review. However, the current study reaches an erroneous conclusion. The proposed project will have an aesthetic effect that will cause a substantial adverse change in the significance of the historic resource.
19		general	The proposed project does not adhere to the Standards and Guidelines. It is beyond the scope of this peer review to recommend appropriate Mitigation Measures.