

September 25, 2015

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

Subject: Peer Review of Space Frame Option 2 Design for Greylands Mansion for the City of San Jose, Santa Clara County, California (LSA Project No. SJO1501)

Dear Ms. Panakkal:

At your request, I have completed my review of Space Frame Option 2 drawings for the above-referenced project. This letter is in follow-up to the letter you received from Casey Tibbet dated September 23, 2015.

Following is an analysis of the proposed project at 2055 Hamilton Avenue. The analysis applies the Secretary of the Interior's Standards (SOIS) for Rehabilitation to the final design dated September 21, 2015, submitted by Christopher Lotti, Sr. Construction Manager, eBay, Inc. and labeled "Space Frame OP2."

Standards for Rehabilitation

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.* The proposed project will give a new use to the outdoor space east of the east one-story wing. Minimal change to distinctive materials, features, spaces, and spatial relationships will occur.
2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.* The property is a representative example of a 1927 Dutch Colonial Revival residence. The proposed project will alter outdoor spaces and spatial relationships, but the character of the property will be preserved, provided these alterations are screened from view by the appropriate mitigation measure, or the preservation or addition of screening plant materials or other landscape elements.
3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.* The proposed project adheres to this standard; there is nothing in the design to create false historicity.
4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.* No such changes have been documented.

5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.* The proposed project adheres to this standard.
6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.* The project does not propose to repair or replace any deteriorated historic features.
7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.* The project does not propose chemical or physical treatments to historic materials.
8. *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.* The study prepared by Page & Turnbull (P&T) noted that the proposed project will include excavation and that "... in the case of an encounter with archaeological materials, provided standard discovery procedures are followed, the proposed project will be in compliance with Rehabilitation Standard 8." The attachment to Ms. Tibbet's letter of September 23, 2015, commented that P&T should have defined a Project Area limit (PAL) and conducted a records search for both archaeological and built-environment resources within a given radius of the PAL, typically one-half mile. Assuming the only historical resource recorded within the PAL is Greylands Mansion, the proposed project adheres to this standard.
9. *New additions, exterior additions, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.* The proposed project to construct the Main Street Building includes related construction of a canopy space frame and patio in the area immediately east of the Greylands Mansion. Upon careful consideration of the visual impact and cumulative effects of the proposed new construction, this reviewer concludes that the Space Frame Option 2 design allows Greylands Mansion to convey its significance. The SOIS recommends preserving important landscape features, including ongoing maintenance of historic plant material. Since the mature trees screen the related new construction from view, it is recommended that their preservation be formally incorporated as a mitigation measure. The Space Frame Option 2 design is differentiated from the old and compatible with the integrity of the property and its environment.

In summary, the three aspects of integrity most important to the significance of this 1927 representative example of Dutch Colonial Revival architectural style are integrity of materials, workmanship, and design. The proposed project will not impact those aspects of integrity. The Main Street Building, Space Frame, and the patio will further erode the integrity of the setting, feeling and association of the historical resource; however, by adopting the appropriate mitigation measure, the proposed project will adhere to the SOIS and not cause a substantial adverse change in the significance of the resource.

If you have any questions, please contact me at Eugene.Heck@lsa-assoc.com or by telephone at (951) 781-9310, extension 241.

Sincerely,

LSA ASSOCIATES, INC.



Eugene J. Heck, M.A.
Cultural Resources Manager
Historian/Architectural Historian

Attachment: Comments Matrix

Lloyd House/Greylands Mansion Response Table

Submitted by: Eugene Heck, M. A.

No.	Ch.	Page/Paragraph No. or other Designation	Reviewer Comments
1		Overall	Previous comments centered on the 18-page "Part 2 eBay Main Street Building Proposed Project Analysis," submitted with the Historic Report and Proposed Project Analysis prepared by Page & Turnbull (P&T) for 2055 E. Hamilton Avenue, San Jose, CA. The current review and comments are directed to "Space Frame Option 2" Final Design Drawings submitted by DESIGN, 111 5th Ave., 12th Floor, New York, NY 10003. The proposed "Space Frame Option 2" design was reviewed with respect to the Secretary of the Interior's Standards for Rehabilitation, as part of CEQA compliance.
2		general	The building retains the aspects of integrity most needed to convey its significance under Criterion 3 (Architecture): integrity of materials, workmanship and design.
3		general	As previously remarked, 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.
4		general	The study prepared by P&T allows the Lead Agency to determine that the resource may be an historical resource as defined in Public Resources Code (PRC) Sections 5020.1(j) or 5024.1. Specifically, the Greylands Mansion is individually eligible for listing in the California Register of Historical Resources under Criterion 3 (Architecture), as a representative example of the Dutch Colonial Revival style.
5		general	The Guidelines for Rehabilitating Historic Buildings note that of the Secretary of the Interior's four treatments, only Rehabilitation includes an opportunity to make possible an efficient contemporary use through alterations and additions. Per CEQA Section 15064.5(b)1, the proposed project has the potential to alter the resource or the immediate surroundings of the historical resource, such that the significance of an historical resource would be materially impaired. If the proposed project to construct another industrial building in the immediate surroundings of Greylands Mansion (the Main Street Building with its associated plaza and canopy space frame) adheres to the Secretary of the Interior's Standards (SOIS) and guidelines regarding the Building Site, the project will avoid a substantial adverse change in the significance of the historical resource.
6		general	In the previous design, the historic spatial relationships that characterize the property were severely eroded and the design had a cumulative visual effect that would cause substantial adverse change in the significance of the resource. This was because the previous design proposed 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 would be approximately 14 feet from the northeast corner of the historic house.

Lloyd House/Greylands Mansion Response Table

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7		Space Frame OP2 Axonometric	Greylands Mansion is no longer dwarfed by the space frame, as in the previous the previous design. The spatial relationship between Greylands Mansion and the portion of the designed landscape between the public right-of-way and the building remains unaltered from the period of significance, 1927. The free standing metal columns located behind the house are unobtrusive in the sense that they are outside the viewshed relating the public right-of-way to Greylands Mansion.
8		Space Frame OP2 Exterior 1A	The space frame is no longer gambrel shaped; there is no hint of false historicity. Greylands Mansion is free of a looming canopy space frame. The scale of the signage appears to be smaller scale than the previous design, but no Signage Sizing Study was submitted for Space Frame OP2.
9		Space Frame OP2 Exterior 2	The eBay sign attached to louvers and the fabric awning strips stretched on cable structure appear to be appropriately scaled and related to the new Main Street Building.
10		Space Frame OP2 Plan (no drawing number)	The space frame structure is now set back from the one-story east wing of the house. The steel frame painted white and the suspended cable grid supporting fabric strips in "Pixel Pattern" stretched on cable grid appear to be screened from view by a stand of mature trees. The Main Street Building also appears to be screened from view by mature trees. See comment 7 regarding the columns at entry.
11		Site Plan Drawing Number EX0.1	The drawing is not to scale; however, the distance between the east one-story wing of Greylands Mansion and the line of the canopy is given as 13 feet, 5 inches. The new building, the new patio, and the existing adjacent buildings appear to be screened from view from the public right-of-way by mature trees.
12		Exterior West/East Elevations Drawing Number EX0.2	The scale is 1 inch = 20 feet. The width of the space frame is 68 feet. The west eBay sign dimensions are not given; sheet GR1.2 has not been submitted. The distance between the space frame and the new building is one foot. The west elevation and the east elevation show that the new building has façade panels and single and double exterior doors, is 48'-6" high and 151' in length. The space frame is 31' high and 68' wide.
13		general	The spatial relationships that characterize the property appear to be retained by the new Space Frame OP2 design, if and only if the mature trees depicted on these drawings are present to screen the new construction adjacent to the building site from view.
14		general	The cumulative impact of the proposed project upon the historical resource will not "tip the scale." Greylands Mansion will retain the aspects of integrity needed to convey its significance as a truly representative example of a 1927 Dutch Colonial Revival residence, despite additional changes in the setting.
15		Overall	Space Frame OP2 adheres to the SOIS.