

PRESERVATION ACTION COUNCIL OF SAN JOSE

Dedicated to Preserving San Jose's Architectural Heritage

March 20, 2020

Transmitted via e-mail

City of San Jose
Department of Planning, Building & Code Enforcement
Attn: Kara Hawkins, Environmental Project Manager
200 E Santa Clara Street, 3rd Floor Tower
San Jose, CA 95113

EIR Scoping Input for the Block 8 Project (H19-033)

The Preservation Action Council of San Jose (PAC*SJ) is pleased to submit the following comments regarding the EIR Notice of Preparation for the Block 8 Project (H19-033) located at 285 S. Market Street (APN 259-42-080). We are generally supportive of the development of this parcel, which has been underutilized as a surface parking lot for more than twenty years. However, given the site's location in a prominent and highly sensitive historic area of downtown San Jose, PAC*SJ has grave concerns about the project's potentially significant negative impact on the visual character and operational viability of the numerous historic resources which surround it.

Following the parameters of historic adjacency established in the San Jose Downtown Design Guidelines and Standards (adopted 4/23/2019, amended 5/21/2019), the project stands within 100 feet of three Designated City Landmarks: the **St. Claire Hotel** (302 S. Market Street, APN 264-29-107), the **St. Claire Building** (301 S. First Street, APN 264-29-057), and the **Montgomery Hotel** (211 S. First Street, APN 259-42-079). The San Jose Historic Resources Inventory (HRI) also includes two additional historic properties located within 200 feet of the project area: the Designated City Landmark **Dohrman Building** (325 S. First Street, APN 264-29-058), and the **Valley Title Building/Hale's Department Store** (300 S. First Street, APN 467-46-081), which despite its c.1970s exterior alterations, is listed in the HRI as a Structure of Merit and possesses potential for transformative rehabilitation in the future. In addition, three Designated City Landmarks fall just beyond the 200-foot area of adjacency, but are nevertheless critical to the historic character of the area: the **California Theatre** (345 S. First Street, APN 264-29-114), the

History Park, 1650 Senter Road, San Jose, CA. 95112

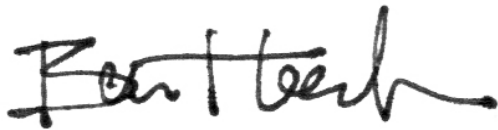
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Civic Auditorium (145 W. San Carlos Street, APN 259-42-023) with the Market Street facing and attached **Montgomery Theatre**, and the **Twohy Building** (200 S. First Street, APN 467-46-030).

It is crucial that the Block 8 EIR scope include a robust analysis of the project's potential impacts on the physical appearance, structural stability, and operational viability of each of these above-listed historic resources. In addition to addressing how the height, materials, massing, and operation of the project may impact each site, the EIR must also address the cumulative effects of other approved and proposed projects in the immediate vicinity, including the **San Jose Tribute Hotel Project** (H16-042 and HP17-003), which proposes a 24-story overbuild to the immediately adjacent Montgomery Hotel, whose relocation and restoration in 2000 was undertaken with significant public expenditures. It is also important that the scope of the EIR take into account adverse impacts to the potential creation of a SoFA Historic District and/or any initiative to formally recognize First Street as San Jose's historic Main Street. It is important to note that the Block 8 building would be at the immediate gateway to a such a future Historic District. Potential cumulative effects include, but are not limited to, the structural stability, maintenance logistics, and operational viability of the existing historic buildings during and after project construction, as well as potential negative impacts to future historic landmark and/or historic district eligibility.

Sincerely,



Ben Leech
Executive Director
Preservation Action Council of San Jose

cc: Juliet Arroyo