

TREANORHL

THE PARK HABITAT PROJECT, SAN JOSE, CALIFORNIA
DESIGN GUIDELINES AND STANDARDS
COMPLIANCE REVIEW

DRAFT

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1. INTRODUCTION

At the request of David J. Powers & Associates, Inc., TreanorHL has prepared the following design compliance assessment of the proposed Park Habitat project at 180 Park Avenue in San Jose (APN 259-42-023). The project proposes to demolish an existing building at the site, Parkside Hall, and construct a new 20-story building with four levels of underground parking. To the south, adjacent to the site is the Civic Auditorium and McCabe Hall complex (also known as the Civic Auditorium complex, San Jose Civic or City National Civic¹), a listed City Landmark and a historic Civic Icon building. To the east, The Tech Interactive, a Civic Icon building, is adjacent to the subject property. According to the *San Jose Historic Resources Inventory*, there are no other historic resources within 200 feet of the project site.² The project site is within the General Plan Downtown Growth Area and the Downtown Core. This report includes an evaluation of the proposed design for compliance to the *Secretary of the Interior's Standards for Rehabilitation* (the Standards) and the *San José Downtown Design Guidelines and Standards* (2019, updated 2020). The design assessment and compliance analysis are provided in order to inform the environmental process and determine if the proposed project would result in a substantial adverse change in the significance of or cause an impact to any historic resources as defined by the California Environmental Quality Act (CEQA) and to ensure compliance with local planning guidelines and regulations relevant to historic resources.

2. SUMMARY OF FINDINGS

Following a thorough review and compatibility assessment of the proposed project TreanorHL finds that the Park Habitat project is partially compatible in design relative to relevant standards and guidelines. The proposed work at the adjacent Civic Auditorium complex complies with the Secretary of the Interior's Standards for Rehabilitation; therefore, the proposed project does not have the potential to impact the historic integrity of the adjacent Civic Auditorium complex, resulting in a less-than-significant impact on the historic resource. The project complies with all of the applicable 2019 Guidelines, except 4.2.4 Historic Adjacency - Façade g. window placement. Even though the proposed design does not fully comply with the local standards and guidelines, the proposed project would not substantially impair the significance or integrity of the adjacent historic Civic Auditorium complex such that it would no longer be eligible for listing in the San Jose Historic Resources Inventory. Therefore, on balance, the proposed project is substantially compliant to relevant local historic preservation regulations.

The proposed project would not adversely impact any physical characteristics of the historic Civic Auditorium complex that convey its historical significance. No design changes are recommended; however, mitigation measures are proposed to address the protection of the historic resource from potential damages due to construction-related activities.

3. METHODOLOGY

TreanorHL conducted a site visit on October 20, 2020 to evaluate the existing conditions, historic features, and architectural significance of the subject property, the adjacent Civic Auditorium complex, and the surrounding area. Staff also reviewed the proposed project drawings dated February 26, 2021 (Kengo Kuma & Associates

¹ San Jose Theaters official website <https://sanjosetheaters.org/civic-2/> (accessed November 1, 2020).

² City of San Jose, Historic Resources Inventory, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/historic-preservation/historic-resources-inventory> (accessed October 26, 2020).



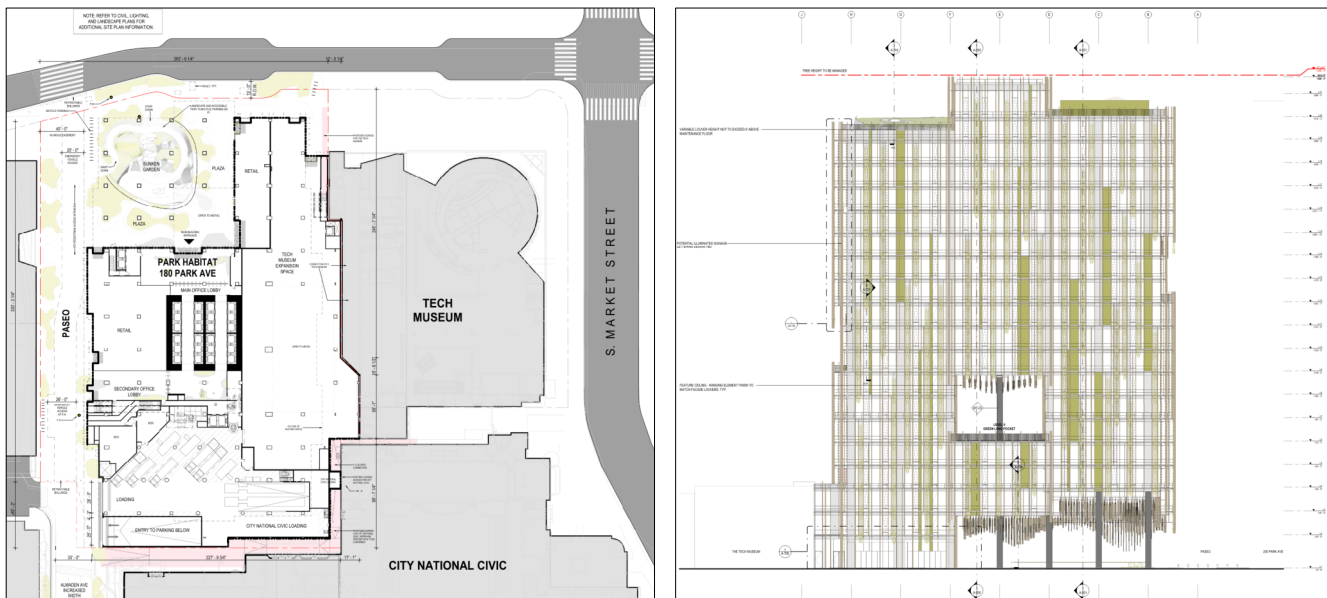
and Adamson Associates, Inc., Park Habitat – Plan Set Resubmitted for Site Development Permit Application), and additional sheets dated December 7, 2020 and February 21, 2021 (see Appendix).

4. PROPOSED PROJECT DESCRIPTION

The proposed project is a mixed-use development, comprising of 20 stories plus a roof deck above grade and four stories of parking below grade. The program is predominantly office space with retail space located on levels P1, and 1. Additional commercial space is located on level 20. Expansion space for The Tech Interactive museum is located on levels 1 and 2, adjacent to the existing museum building. The underground parking entrance and loading dock are located at the south end of level 1, accessible from Almaden Avenue.

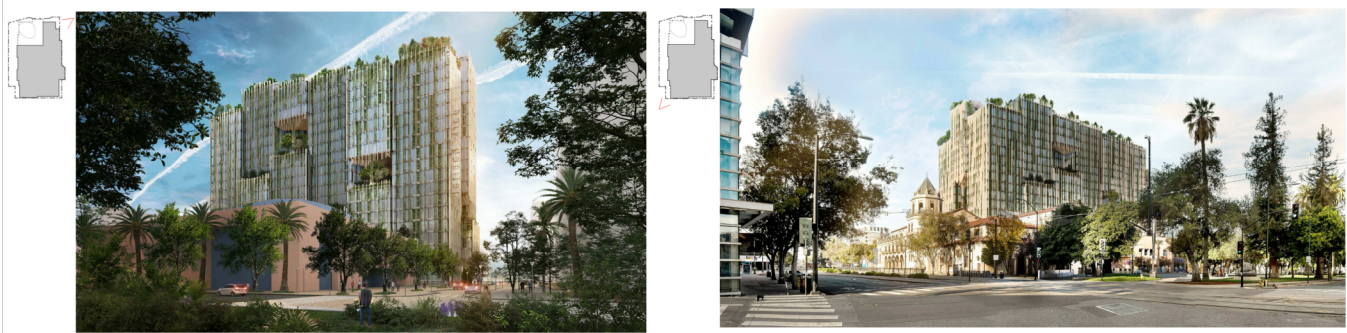
The building design features a full-height courtyard, referred to by the design team as the "green lung," which brings daylight and natural ventilation to the interior of the office floor plates. The main office lobby is accessible from Park Avenue and the pedestrian walkway, or the paseo, and is connected to the bottom of the "green lung." The "green lung" is open to the exterior at levels 1-3, 6-8, 9-11, and 12-14.

The project includes the landscape design of the paseo on the west side of the site, and a pedestrian plaza at the corner of Park Avenue and the paseo. A sloped landscape with an accessible path forms a connection between the sidewalk and the program on level P1, which will include short- and long-term bicycle parking, retail, and valet parking. A constructed wetland is also included in the at-grade landscape. Additionally, the building design features 15 elevated, landscaped terraces at various heights above grade. The majority of the roof is covered with a sloping, heavily landscaped garden.³



Figures 1 and 2. Proposed site plan (left) and the Park Avenue façade (right). Kengo Kuma & Associates and Adamson Associates, Inc., February 26, 2021.

³ Kengo Kuma & Associates and Adamson Associated, Inc., Park Habitat – Plan Set Submitted for Site Development Permit Application, February 26, 2021.



Figures 3 and 4. Renderings of the proposed project; looking southwest from S. Market Street and Park Avenue (left) and looking northwest from S. Market and San Carlos streets (right). Kengo Kuma & Associates and Adamson Associates, Inc., February 26, 2021.

5. SUMMARY PROPERTY DESCRIPTION

The project site is located in downtown San Jose, roughly in the middle of the city block surrounded by Park Avenue to the north, S. Market Street to the east, W. San Carlos Street to the south, and Almaden Boulevard to the west. Parkside Hall currently occupies most of the project site. Near the west end of the block a small road—Almaden Avenue—runs north from W. San Carlos Street to the center of the block where it becomes a pedestrian paseo extending to Park Avenue. In addition to the project site, the subject block features The Tech Interactive (a Civic Icon building), the Civic Auditorium complex (a City Landmark and a historic Civic Icon building), and the Hyatt Place San Jose. A new 20-story building is under construction at 200 Park Avenue, immediately to the west of the paseo. The block to the west features the San Jose Center for the Performing Arts and the block to the south is occupied by the convention center and a hotel. The immediate surroundings feature primarily commercial, cultural and office buildings, with San José State University a few blocks to the east and the Downtown Commercial National Register of Historic Places (NRHP) Historic District a few blocks to the northeast. The subject property is not located within a listed national, state or City Landmark historic district or within a City Conservation Area.

The project site is currently occupied by Parkside Hall which was constructed as the San Jose Convention Center in 1977. The building is “a modern, minimalist design with unadorned stucco clad walls that are crowned by a tall deep recessed and angled cove below the parapet.”⁴ On the east side, Parkside Hall is attached to The Tech Interactive. A loading and staging area roughly in the middle of the block is shared by Parkside Hall and Civic Auditorium complex.

⁴ Frank Maggi and Leslie Dill, Archives and Architecture, LLC, *Parkside Hall DPR Form* (April 14, 2016).



Figure 5. The proposed project site at 180 Park Avenue, outlined in red; the historic Civic Icon building the Civic Auditorium complex highlighted in orange; and the Civic Icon building Tech Interactive highlighted in blue (Google Earth, imagery date June 2019).



Figure 6. The bird's-eye view of the subject block (Google Maps, accessed October 26, 2020).



Figure 7. Looking northeast at the loading and staging area. From left to right, Parkside Hall, The Tech Interactive, and the Civic Auditorium complex are in the background.

6. HISTORIC SIGNIFICANCE SUMMARY

As stated above the proposed project site is occupied by Parkside Hall and is adjacent to The Tech Interactive and the Civic Auditorium complex. Below is a historic significance summary of all three buildings.

Parkside Hall

The existing Parkside Hall building was previously found not eligible as a historic resource in an evaluation prepared by Archives & Architecture, LLC in 2018, and TreanorHL concurs with this finding. In summary the building was determined ineligible based on the following analysis:

While the building meets the criteria of San José's Historic Preservation Ordinance for designation as a City Landmark due to its pivotal role in the establishment of the San Jose Convention Center and due to its association with Mayor Janet Gray Hayes and for her leadership in creation of this center during the mid-1970s, it has been altered in recent years. After changes in the setting and reconfiguration of the access to the exhibit hall, it has lost its ability to convey its historical significance.⁵

The Civic Auditorium Complex

The proposed project is adjacent to the Civic Auditorium complex at 145 W. San Carlos Street which was listed as a San Jose City Landmark in 1986 (HL86-40, Resolution #59560). Constructed in 1934, the Spanish Colonial Revival style building was found significant under Government and Public Services theme for the Inter-War period (1918-1945).⁶ Designed by local architects Ernest N. Curtis and William Binder, the project reflected "early California tradition and this city's history as the state's oldest civic settlement."⁷ The Civic Auditorium complex building includes a 1964 addition known as McCabe Hall. The addition is considered by the City of San

⁵ Archives & Architecture, LLC, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project, 180 Park Avenue San Jose, Santa Clara County, California* (Draft 12.14.2018), 8.

⁶ City of San Jose, Historic Resources Inventory, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/historic-preservation/historic-resources-inventory> (accessed October 19, 2020).

⁷ "HL86-40; Civic Auditorium, 145 West San Carlos St.," Preservation Action Council of San Jose, *Continuity* (Fall 2011), page 19.

Jose to be a part of the complex and to have acquired historic significance in its own right.⁸ According to a City of San Jose memorandum dated September 2020, McCabe Hall is a character-defining feature of the historic Civic Auditorium.⁹ Therefore, this report will refer to the Civic Auditorium complex property as a whole, including both the original 1934 building and the 1964 McCabe Hall addition. TreanorHL also concurs with the finding that the Civic Auditorium complex is a historic resource as defined by the City of San Jose and the California Environmental Quality Act (CEQA).

A refurbishment for the Civic Auditorium began in the late 2000s. In order to accommodate better backstage loading access to the complex, the breakout conference rooms that had been built in the 1970s were demolished: "The project resulted in the final disconnection of Parkside Hall from the Convention Center, and the walled-in plaza permanently became a loading, parking and staging area to serve events at Parkside Hall, The Tech, and the City National Civic."¹⁰

The Tech Interactive

The Tech Interactive designed by Ricardo Legorreta was constructed in 1998. The building is less than 50 years old, and as such does not meet the minimum age requirement for consideration as a historic resource. Properties that have achieved significance within the past 50 years are not considered eligible for the federal or state registers unless they are of exceptional importance.¹¹ The property does not appear to meet the criteria for exceptional importance to qualify as a historic resource.

Other

According to the *San Jose Historic Resources Inventory*, there are no other previously identified or listed historic resources within 200 feet of the project site.¹²

7. REGULATORY FRAMEWORK

California Environmental Quality Act

When a proposed project may adversely affect a historical resource, CEQA requires a city or county to carefully consider the possible impacts before proceeding. CEQA equates a substantial adverse change in the significance of a historical resource with a significant effect on the environment. The legislation explicitly prohibits the use of a categorical exemption within the CEQA Guidelines for projects which may cause such a change (Section 21084).¹³

A "substantial adverse change" is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Further, that the "significance of an historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources;" or "demolishes or materially alters in an adverse manner those physical characteristics that

⁸ Archives & Architecture, LLC, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project, 180 Park Avenue San Jose, Santa Clara County, California* (Draft 12.14.2018), 37-38.

⁹ City of San Jose, *Memorandum, Early Referral City National Civic Auditorium Loading Project (ER19-058)*, September 2, 2020.

¹⁰ Archives & Architecture, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project*, 21.

¹¹ National Park Service, *How to Apply the National Register Criteria for Evaluation, National Register Bulletin 15* (Washington, DC: United States Department of the Interior, 1997), 40-43.

¹² City of San Jose, *Historic Resources Inventory*, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/historic-preservation/historic-resources-inventory> (accessed October 26, 2020).

¹³ Public Resources Code Sections 21084 and 21084.1.

account for its inclusion in a local register of historical resources..." or "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA."¹⁴ Generally a project that follows the Standards shall be considered to have a less than significant impact on a historical resource.¹⁵

For the purposes of CEQA (Guidelines Section 15064.5), the term "historical resources" shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the California Register of Historical Resources (CRHR).¹⁶
- 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 of 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.
- 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 in the CRHR¹⁷ as follows:
 - 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.

City of San José Regulations

The San José City Council has adopted guidelines prepared by the Planning Division to assist with the design, construction, review and approval of development in San José. These guidelines provide the minimum design standards to be applied to various developments and land uses and serve to facilitate a consistent and efficient review process of proposed developments.¹⁸

San Jose Downtown Design Guidelines and Standards (2019, updated 2020) provide guidance for the form and design of buildings in Downtown, their appearance in the larger cityscape, and their interface with the pedestrian level. The guidelines apply generally to the General Plan Downtown Growth Area and the Diridon Station Area Plan Area; generally bounded in the south by Highway 280, on the north by Coleman Avenue, on the west by Diridon Station, and on the east by San José State University (SJSU). While the SJSU campus is not

¹⁴ Public Resources Code Sections 21084.1

¹⁵ CEQA Guidelines Section 15064.5.

¹⁶ Public Resources Code Section 5024.1, California Code of Regulations, Title 14, Section 4850 et seq.

¹⁷ Public Resources Code Section 5024.1, California Code of Regulations, Title 14, Section 4800.3.

¹⁸ City of San Jose, "Design Guidelines," <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/start-a-new-project-or-use/design-guidelines> (accessed September 3, 2020).

within the boundary of the Downtown Growth Area, it is included within the proposed Design Guidelines boundary since it contributes significantly to the vitality of downtown.¹⁹ The Design Guidelines also set rules for new buildings and external alterations to non-historic buildings being built near and adjacent to historic and other key structures within the Design Guidelines boundary.

8. PROJECT ASSESSMENT

CEQA

The proposed design includes alterations to the existing Civic Auditorium complex; therefore, the project is reviewed for compliance with the Standards in order to determine if the project would result in a substantial adverse change in the significance of or cause an impact to any historical resources as defined by CEQA.

Secretary of the Interior's Standards for Rehabilitation

As discussed above, the project site does not include a previously identified or potential historic resource, and it is not located within the boundaries of a historic district. However, the immediately adjacent Civic Auditorium complex is a City Landmark, and the project proposes work at the courtyard facing north and west walls of the property. CEQA recognizes that generally, a project that follows the Standards shall be considered as having a less-than-significant impact on the historic resource. Therefore, the proposed project is assessed for compliance with the Standards. The ten standards are evaluated below.

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.*

Analysis. The proposed mixed-use building will include retail, The Tech Interactive expansion, and office spaces. The proposed project will not alter the historic Civic Auditorium complex's current use as an indoor performance venue and will not require changes to any of the distinctive materials and character-defining features of the historic building.

The project does propose to remove the existing loading dock between Parkside Hall and the historic building; however, this loading dock is located in a rear service area and is not considered a defining characteristic of the historic building. Although the proposed adjacent project will result in changes to the historic building's site and environment, it will not directly alter any character-defining features, distinctive spaces or spatial relationship of the historic property. The Civic Auditorium complex building will continue to be used as it was historically, and will still clearly convey its historical, cultural, and architectural significance. Therefore, the proposed project complies with Standard 1.

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 a property will be avoided.*

Analysis. As proposed, the project maintains the historic character of the Civic Auditorium complex including all its character-defining features and its Spanish Colonial Revival architectural style. No distinctive materials will be removed, and no distinctive features will be altered. The proposed Park Habitat building will remove the existing shared loading dock to the north of the historic building; however, this is not a space or feature that characterizes the Civic Auditorium complex.

Design drawings indicate that the proposed building will be physically separated from most of the Civic Auditorium complex. The existing open-air loading and staging area will continue to function as a loading

¹⁹ City of San Jose, *San Jose Downtown Design Guidelines and Standards* (adopted April 23, 2019, amended May 21, 2019, Planning Director's update May 1, 2020), 2-3.

area, but it will be enclosed. At the south end of the west elevation of the proposed design, two garage doors open into the single-story high, panel-clad wall that screens the loading area and the underground parking entry. Only a portion of the loading area at the south end is not covered by the full height building above and the design drawings indicate that there will be a roof aligned with level 2 over the remainder of the loading area. This loading area and roof will be physically separated from the Civic Auditorium complex except for a loading bridge at the courtyard facing west wall of the Civic Auditorium.

Floor plans indicate that an approximately 5' to 16' wide egress path is planned along the existing north wall of McCabe Hall and west wall of the Civic Auditorium. The existing ramps and stairs along the courtyard facing north and west façades of the Civic Auditorium complex and the existing loading platform on the west façade will be removed. A new egress path and a new loading bridge will be constructed. The existing stairs and platforms are not character-defining features of the historic complex, and their removal will not affect the historic integrity or significance of the resource. During demolition, necessary precautions should be taken not to damage the historic building. At the areas of excavation and removal, the new exterior cladding material should match the existing stucco in-kind.

Even though these proposed features may result in some minor alteration and/or removal of the historic building fabric at secondary façades, the majority of the historic building will remain untouched. Further, the original form, features, spaces, and spatial relationships of the historic property will still be apparent and unaltered, and the building will continue to communicate its significance.

As proposed, the project complies with Standard 2.

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.*

Analysis. The proposed project does not include the addition of conjectural elements or architectural features from other buildings. The new Park Habitat building will be contemporary in design and easily distinguished from the historic Civic Auditorium complex. The new work will not create a false sense of historical development; therefore, the proposed project complies with Standard 3.

4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

Analysis. Completed in 1964, McCabe Hall is a later addition to the Civic Auditorium building.²⁰ McCabe Hall is considered to be a character defining feature of the complex and it has acquired historic significance in its own right. The proposed project does not involve any major alterations to McCabe Hall; it will be retained and preserved as part of the historic property. The existing ramps and stairs along the north wall will be removed; however, these are not character-defining features of McCabe Hall, and their removal will not affect its historic integrity or significance. Therefore, the proposed project complies with Standard 4.

5. *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Analysis. It is evident that the proposed project will maintain and preserve the Civic Auditorium complex's distinctive materials, finishes, construction techniques, and character-defining features everywhere except at the façades facing the loading area. The existing ramps and stairs along the north and west façades of the

²⁰ Archives & Architecture, LLC, *Historic Resources Project Assessment, Museum Place II Mixed-Use Project, 180 Park Avenue, San Jose, Santa Clara County, California* (Draft 12.14.2018), 14-15.

Civic Auditorium complex and the existing loading platform on the west façade will be removed. The existing stairs and platforms are not character-defining features of the historic complex, so their removal will not affect the historic integrity or significance of the resource. The new building and loading area are mostly separated from the historic resource by an egress path except for the loading access at the Civic Auditorium's west façade. The design drawings indicated that most of the proposed work is physically separated from the historic Civic Auditorium complex and therefore would not impair the ability of the property to convey its distinctive finishes or construction techniques. During the demolition, necessary precautions should be taken not to damage the historic building. At the areas of excavation and removal, the new exterior cladding material should match the existing stucco in-kind. As proposed, the project complies with Standard 5.

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 in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Analysis. The proposed project is almost completely physically separated from the historic resources and does not involve any repairs to the historic features at the Civic Auditorium complex. Therefore, the proposed project complies with Standard 6.

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.*

Analysis. The proposed project does not involve any chemical or physical treatments to the Civic Auditorium complex. Therefore, the proposed project complies with Standard 7.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Analysis. During the project, appropriate mitigation and protection measures will be undertaken if any archaeological resource is uncovered. Therefore, the proposed project provisionally complies with Standard 8.

9. *New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will 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.*

Analysis. The proposed project includes related new construction, a 20-story tower, adjacent to the historic Civic Auditorium complex. The new tower will be contemporary in design and clearly differentiated from the historic property. On the street-facing primary (south and east) façades of Civic Auditorium complex, the proposed project will not destroy any historic materials or features that characterize the property. The exterior alterations to the historic property will be minimal: on the west façade, the existing loading entrance will be connected to the new building through a loading bridge above the egress path. Approximately 18' wide, the proposed loading bridge will minimally touch the historic resource at the side walls, floor, and roof. A joint material will be used between where the bridge structure touches the historic building, and the bridge structure will be clad in warm grey glass fiber reinforced concrete panel.

The new egress path will be constructed adjacent to the historic complex. At the areas of excavation and removal, the new exterior cladding material should match the existing stucco in-kind.

Also, a roof is proposed over the loading area with two chiller units on top. The roof will be separated 5' to 22' from the existing historic resource via south egress. The chillers will be behind a trellis screen with vegetation. As proposed, the project will not destroy historic materials or features.

The proposed Park Habitat tower will be clearly differentiated from the historic resource and compatible in terms of materiality. The proposed tower will have earth-toned terra cotta clad structural columns with trellis column surrounds and plantings at the base, terra cotta louvers and solid façade panels, curtain wall glazing panels, and green walls and/or green screens on the façades. The use of a neutral-colored terra cotta and glazing appears compatible with the adjacent beige exterior walls of the Civic Auditorium complex. Although the vertical landscaping is a more contemporary approach in terms of exterior cladding, it will be generally compatible with the surrounding horizontal green spaces on the paseo, Plaza de Cesar Chavez, San Jose Veterans Memorial, and the Guadalupe River trail. Therefore, while strikingly different the proposed materials would be generally compatible.

In comparison to Civic Auditorium complex the proposed construction is quite different in terms of features, size, scale and proportion, and massing. However, the subject site is currently surrounded by taller contemporary buildings (the adjacent office building at 200 Park Avenue—under construction, San Jose Marriott and Hilton San Jose on W. San Carlos Street, City View Plaza buildings at 150 Almaden Boulevard and 125 S. Market Street, and Fairmount Annex are all within a 1/8-mile radius of the proposed project), and the proposed tower is in keeping with the greater neighborhood context.

The proposed Park Habitat building will alter the environment of the Civic Auditorium complex by removing the Parkside Hall and adding a tower to the north. The setting of the historic property has been altered several times since its construction in 1934. The property was originally surrounded by mostly one-story dwellings until the block was acquired by the City and cleared in the early 1960s. McCabe Hall was added to the original Civic Auditorium building in 1964, Parkside Hall was constructed in 1977 as the new convention center, and The Tech Interactive was constructed in 1998. The Civic Auditorium was listed as a San Jose City Landmark in 1986 despite the numerous changes over time to its immediate setting. Even though the proposed project will again alter the existing environment, the Civic Auditorium complex will still retain sufficient integrity to convey its historic significance and to be listed as a City Landmark.

Overall, the proposed project complies with Standard 9.

10. *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Analysis. The proposed project will add a 20-story tower to the north of the Civic Auditorium complex which will be largely detached from the historic building except for the loading access bridge and the egress path on the courtyard facing west and north façades. The future removal of the related alterations and new construction would result in a return to the current conditions; therefore, the essential form and integrity of the historic property and its environment would also return to its current conditions and would remain unimpaired. Therefore, the proposed project complies with Standard 10.

Summary of Compliance to the Standards

In summary, the proposed project complies with Standards 1-10; therefore, it does not have the potential to impact the historic integrity of the adjacent Civic Auditorium complex. The proposed project is considered as having a less-than-significant impact on the historic resource.

Local Planning Regulations

This section provides a design analysis using the standards detailed in the San José Downtown Design Guidelines and Standards (2019, updated 2020).

2019 City of San Jose Downtown Design Guidelines and Standards

Adopted in April 2019 and updated in May 2020, the *City of San Jose Downtown Design Guidelines and Standards* (2019 Guidelines) provides a framework for addressing new construction adjacent to eligible historic resources. The proposed project is located within the Downtown Design Guidelines boundaries. The project is adjacent to one historic resource, the Civic Auditorium complex at 135 W. San Carlos Street, which constitutes the new building's *Historic Context*. It is also within the Affected Area of two Civic Icon buildings: The Tech Interactive and Civic Auditorium complex. Therefore, the applicable guidelines are 4.2.2 Massing Relationship to Context, 4.2.3 Civic Icon Adjacency, and 4.2.4 Historic Adjacency.

4.2.2 Massing Relationship to Context. Create massing transitions between high-rises and lower-scale development.

- a. Height Transition: If a new building 100 feet tall or more is across the street from or adjacent to either:*
- 1. A historic building 45 feet tall or less*
 - 2. A site for residential use that is limited to building 45 feet tall or less*

The new building must step back its street-facing façade 5 feet minimum from the front parcel or setback line at an elevation between 25 and 50 feet.

Analysis: The proposed building is 298 feet tall and is adjacent to the historic Civic Auditorium complex which is taller than 45 feet. Therefore, this standard is not applicable.

- b. Width Transition: If a new building is across the street from or adjacent to a historic building that is both*

- 1. 45 feet tall or less*
- 2. More than 30 feet narrower than the new building*

The new building must create gaps in the Podium Level above the ground floor to divide its street-facing massing into segments no more than 30 feet wider than the widest of the applicable historic buildings. Gaps must be 5 feet minimum width and depth.

There is no need to limit the massing width of a building adjacent to historic buildings that occupy their full lot width, such as historic storefronts. Thus, a historic building's street-facing façade continues to within 5 feet of its parcel edges, it does not trigger the Width Transition requirement.

Analysis: The proposed building is adjacent to the historic Civic Auditorium complex. The west façade of the historic Civic Auditorium facing the Paseo is approximately 100 feet wide. The west façade of the proposed Park Habitat building is over 300 feet wide. Therefore, the historic building is more than 30 feet narrower than the new building. The Paseo-facing massing of the new building is divided into 60 feet-wide segments by use of the protrusion and regression of the façade surface. This division is further articulated with louvers and green walls. Overall, the proposed project is consistent with this standard.

- c. Rear Transition: If a new building 100 feet tall or more is across a parcel line interior to a block from either:*

- 1. A historic building 45 feet tall or less*
- 2. A site for residential use that is limited to a building 45 feet tall or less*

The rear portion of new building must maintain a transitional height of 70 feet or less within the first 20 feet from the property line.

Analysis: The historic Civic Auditorium complex is taller than 45 feet. Therefore, this standard is not applicable.

4.2.3 Civic Icon Adjacency. Design a building within the affected area of a Civic Icon to enhance the Icon's visibility and importance.

a. Use a Streetscape and landscape design that helps to unify the new and existing structure.

Analysis: The proposed building is adjacent to and within the affected area of a Civic Icon building, The Tech Interactive. The proposed building will have its main pedestrian entries on Park Avenue which will revitalize and activate the sidewalk along the northern façade of The Tech Interactive. The proposed design is consistent with this guideline.

b. Design a new building in the Civic Icon building Affected Area to avoid dominating the icon to allow the icon to stand out.

Analysis: The proposed building will be connected to The Tech Interactive on the ground floor and provide expansion space for the museum, which will serve to enhance the museum's footprint and importance. The proposed Park Habitat building is a 20-story tower adjacent to the horizontally oriented, three- to four-story tall tech museum building; therefore, it will be significantly taller than the Civic Icon building. However, because the Park Habitat building will stand to the north of and behind The Tech Interactive, it will not dominate the front, primary façade of the Civic Icon or the primary southeast corner view of the iconic building. The Tech Interactive will still maintain a visually strong independent and iconic design. The proposed design is consistent with this guideline.

c. Protect and enhance views to the Civic Icon building.

Analysis: The primary views along S. Market Street will be protected and there will be no visual impact to the iconic corner element. The views to the Civic Icon building from the northern end of Park Avenue will not be protected since the proposed building will stand north of The Tech Interactive, however these are not the primary views to the Civic Icon. The proposed design is consistent with this guideline.

4.2.4 Historic Adjacency. Incorporate essential urban and architectural characteristics of historic context.

Massing

a. Relate Podium Level building massing to the scale of Historic Context buildings by breaking a large building into masses of similar scale to Historic Context buildings.

Analysis: Even though the Civic Auditorium complex and the Park Habitat building face different streets and only the west side façades align, the proposed design does effectively break up the podium level into smaller, similar scale massing elements by the use of vertical storefront divisions, the rhythmic terra cotta elements and green panels, the protrusion and regression of the façade surface, and the overhang of the catwalk. Therefore, the proposed design is consistent with this standard.

b. Design buildings with rectilinear rather than curved and diagonal forms where rectilinear forms are typical of the Historic Context buildings.

Analysis: The proposed design is consistent with this standard.

c. Use cornice articulation at the Podium Level at a height comparable to the heights of Historic Context buildings.

Analysis. The proposed building provides a stepped podium level without featuring a typical cornice articulation. The podium level defined by unadorned storefronts and glazed curtain walls is more transparent than the upper floors which are articulated with louvers, green walls, and trellis column surrounds. Further the podium level is defined by the protruding catwalk element that provides the base for vertical terra cotta louvers and in effect serves as the podium cornice. The podium height would be appropriate as compared to the height of the adjacent McCabe Hall. The proposed project is consistent with this standard.

d. Maintain Streetwall continuity with Historic Context buildings that are on the same side of the same street by placing the street-side façade of a new building 5 feet of the average Historic Context building Streetwall distance from the front property line.

Analysis. The historic Civic Auditorium complex features an articulated street wall along W. San Carlos Street while the T-shaped massing forms a plaza on the S. Market Street side. The proposed building fronts Park Avenue. The only façade side the two buildings would share is the west and even those conditions are not similar: the historic building faces a small alley with vehicular access and Park Habitat will front a pedestrian paseo. Therefore, this standard is not applicable.

Façade

e. Use articulation that creates façade divisions with widths similar to Historic Context buildings on the same side of the same block (if the new building is wider).

Analysis. The historic Civic Auditorium complex is not on the same side of the block. The primary facades of the Civic Auditorium complex face south and east while the primary facades of the proposed building face north and west. Therefore, this standard is not applicable.

f. Do not simulate historic architecture to achieve these guidelines and standards.

Analysis. The proposed building is clearly contemporary and does not simulate historic architecture. The proposed project is compatible with this standard.

g. Place windows on facades visible from the windows of the adjacent Historic Context structure even if this requires that the façade be set back from the property line.

Analysis. The proposed Park Habitat building has curtain wall glazing panels with windows on all four sides, including the façades facing the historic resource. The south and east façades will be visible from the west facing semicircular upper level windows of Civic Auditorium complex. Only the existing ground floor storefronts and windows at the north façade of McCabe Hall will be directly facing a ground floor wall with no windows. The proposed project is not fully compatible with this standard due to the windows on the north façade of McCabe Hall.

Elements

h. Use some building materials that respond to Historic Context building materials.

Analysis. The adjacent Civic Auditorium complex has stucco clad walls and clay tile roofs. The proposed building will use a modern vocabulary of materials that is distinct yet compatible with the historic building including terra cotta clad structural columns with trellis column surrounds and plantings at the base, terra cotta louvers and solid façade panels, curtain wall glazing panels, and green walls and/or green screens. The

proposed building materials are also in keeping with existing materials found in the area. Therefore, the proposed project is consistent with this standard.

- i. *The new materials should be compatible with historic materials in scale, proportion, design, finish, texture, and durability.*

Analysis. The new materials appear to be compatible with the historic materials in scale, proportion, design, finish, texture, and durability. The proposed project is consistent with this standard.

Ground Floor

- j. *Space pedestrian entries at similar distances to Historic Context building entries.*

Analysis. The historic Civic Auditorium complex has multiple pedestrian entries on both W. San Carlos and S. Market street façades. The original entries appear to be recessed within an arched opening or within an arcade. The ground floor of the proposed building also has multiple entrances on the north and west façades to two retail spaces, two office lobbies, and The Tech Interactive expansion space. Opening directly to Park Avenue, the proposed plaza, or the paseo, all of the proposed pedestrian entries are recessed. The entries facing the plaza are below the northwest setback reminiscent of the arcades of the historic building. As proposed, the project is consistent with this standard.

- k. *Create a ground floor with a similar floor to ceiling height as nearby Historic Context buildings.*

Analysis. Two primary façades of the proposed building face north and west—in opposite directions from the primary façades of the historic the Civic Auditorium complex. Therefore, creating a similar ground floor height is not relevant to the proposed project and this standard is not applicable.

Summary 2019 Guidelines

In summary, the proposed project complies with all of the applicable 2019 Guidelines and Standards, except 4.2.4 Historic Adjacency - Façade g. window placement in reference to the ground floor windows at the north side of McCabe Hall.

Local Planning Regulations Findings

The proposed design is not fully compliant to the applicable 2019 Guidelines and Standards; but on balance, the proposed project would not substantially impair the integrity of the adjacent historic resource. The Civic Auditorium complex would continue to convey its significance and be listed on the local inventory as a City Landmark. Therefore, the proposed project is substantially compliant to relevant local historic preservation regulations.

9. IMPACTS ANALYSIS AND PROPOSED MITIGATION MEASURES

CEQA

Per CEQA, historic resources include properties eligible for listing on the NRHP, the CRHR, or local register of historical resources (as defined in Public Resources Code §5020.1(k)). According to Public Resources Code §15064.5(b), a project would have a significant effect on a historical resource if it would “cause a substantial adverse change in the significance” of that resource. Specifically, “[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”

Any time there is construction activity adjacent to a historic resource, there is always the potential for direct or indirect impacts and as such it is important to have measures in place to minimize unintentional damages and to prepare appropriate responses to any damage that may occur.

Analysis of Direct Impacts

The proposed project will demolish the existing Parkside Hall to construct the new Park Habitat building. Parkside Hall was found not eligible to be listed on the CRHR or as a San Jose City Landmark; therefore, there are no historic resources as defined by CEQA within the project site.²¹ As such the proposed demolition of Parkside Hall would cause no direct impacts on any historic resources within the project site. Parkside Hall was found eligible to be listed as a Structure of Merit, and the City of San Jose encourages its preservation.²²

The proposed project involves the construction of a new building adjacent to a previously identified historic resource, the Civic Auditorium complex, that could potentially be directly affected by the project since it includes alterations to the historic building. The proposed project was found to be in compliance with the Standards; therefore, the project is found to have a less-than-significant impact on the historic resource per CEQA.

Analysis of Indirect Impacts

The proposed Park Habitat building will be located adjacent to the historic Civic Auditorium complex, a San Jose City Landmark. Following are the potential impacts and the mitigations measures.

Impact 1: Construction-related impacts. The activities related to the physical undertaking of the project would have the potential to physically damage the adjacent historic resource, which could cause a substantial adverse change in the significance of historic resources and therefore require mitigation measures. The proposed project includes demolition of Parkside Hall and construction of a new 20-story building. The proposed project would also require below-grade excavation and foundation work, new building framing, and possible pile driving. These demolition and construction activities may produce ground borne vibrations that would result in potentially significant adverse impacts to the adjacent historic resource, the Civic Auditorium complex. Such impacts could include unintentional damage to or destruction of character-defining features at the historic façades or historic building materials through physical impacts or cracking or damage due to demolition- or construction-related vibrations.

Mitigation Measure 1a. If pile-driving is to be included as part of the construction, then the Civic Auditorium complex should first be surveyed to determine the existing condition. The survey shall be conducted by a historical architect meeting the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture and a structural engineer with a minimum of five years of demonstrated experience with historic buildings. The purpose of the study would be to establish the baseline condition of the building prior to construction, including the location and extent of any visible cracks or spalls. The documentation shall take the form of written descriptions and photographs, and shall include those physical characteristics of the resource that conveys its historic significance and that justifies its inclusion on the local register. The documentation shall be reviewed and approved by the City of San Jose's Historic Preservation Officer (HPO), or equivalent.

Mitigation Measure 1b. A qualified geologist, or other professional with expertise in ground vibration and its effect on existing structures, shall prepare a study of the potential of vibrations caused by excavation and construction activities associated with the proposed project. Based on the results of the study, specifications

²¹ Archives & Architecture, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project*, 36.

²² Archives & Architecture, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project*, 36.

regarding the restriction and monitoring of pile-driving shall be incorporated into the contract. Initial pile-driving shall be monitored and if vibrations are above threshold levels, modifications shall be made to reduce vibrations to below established levels. A copy of the study, contract specifications, and monitoring reports shall be provided to the City of San Jose's HPO, or equivalent.

Mitigation Measure 1c. Prepare and implement a Historical Resources Protection Plan (HRPP) to protect the historic building fabric of the Civic Auditorium complex from direct or indirect impacts during construction activities (i.e., due to damage from operation of construction equipment, staging, and material storage). The project sponsor shall, prior to issuance of public works clearance, including any ground-disturbing work, prepare a plan establishing procedures to protect the resource. The project sponsor shall ensure the contractor follows this plan while working near the historic resource.

The plan shall be prepared by a qualified historical architect and is subject to review by the City's HPO. At a minimum, the plan shall include:

- guidelines for operation of construction equipment adjacent to the historic resource,
- means and methods to reduce vibrations from excavation and construction,
- requirements for monitoring and documenting compliance with the plan, and,
- education/training of construction workers about the significance of the adjacent historic resource.

Mitigation Measure 1d. A qualified team (team) of at least one qualified historical architect and one qualified structural engineer shall monitor the mitigation measures.

The Civic Auditorium complex would be monitored during construction and any changes to existing conditions would be reported, including, but not limited to, expansion of existing cracks, new spalls, or other exterior deterioration. Monitoring reports shall be submitted to the City's HPO, or equivalent on a periodic basis. The structural engineer shall consult with the historical architect, especially if any problems with character defining features of the historic resource are discovered.

If in the opinion of the team, substantial adverse impacts to the historic resource related to construction activities are found during construction, the monitoring team shall so inform the project sponsor, or sponsor's designated representative responsible for construction activities, as well as the City's HPO, or equivalent. The project sponsor shall adhere to the monitoring team's recommendations for corrective measures, including potentially halting construction in situations where construction activities would imminently endanger the historic resource. The project sponsor shall ensure that if repairs occur, in the event of damage to the historic resource during construction, repair work shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and shall restore the character-defining features in a manner that does not affect its historic status.

The team shall prepare a report documenting the site visits. The HPO shall determine the frequency of the reporting period. The team shall submit the site visit reports to the HPO no later than one week after each reporting period. The report shall also include, but is not limited to, the following:

- A summary of the demolition and construction progress,
- Substantial adverse impacts related to the construction activities identified during the site visits,
- The problem and potential impact to the historic resource during demolition and construction activities,
- Recommendations made by the team to avoid the impact,
- Actions taken by the project applicant in response to the problem, and,

- Progress on the level of success in meeting the applicable Secretary of the Interior's Standards for the Treatment of Historic Properties for the project as noted above for the character-defining features, and in preserving the character-defining features of the historic resource.
- If applicable, photographs shall be included in reports to better explain and illustrate progress.

In addition, the team shall submit a final document associated with monitoring and repairs after completion of the construction activities to the HPO prior to the issuance of an Occupancy Permit. The document (e.g., with photographs and other appropriate means) shall summarize the level of success in meeting the applicable Secretary of the Interior's Standards for the Treatment of Historic Properties for the project as noted above for the character-defining features, and in preserving the character-defining features of the historic resource.

With implementation of Measures 1a through 1d, the potential for project construction-related impacts to the identified historic resource would be reduced to less-than-significant.

Impact 2: Historic Integrity. The proposed project entails constructing a 20-story building with a maximum height of approximately 298 feet. The project involves the construction of a towering building adjacent to a historic resource, the Civic Auditorium complex, that could be indirectly affected by the project as a result of alteration of its immediate surroundings. Potential impacts, then, if there are any, would result from the project's alteration of the immediate surroundings of the identified historic resource. Historic integrity is analyzed here to determine the project's potential impact on the adjacent resource.

In general, the historic integrity of the Civic Auditorium complex has been preserved over time and it was found to maintain sufficient integrity for listing as a City Landmark after the construction of The Tech Interactive building. The following is an analysis of the proposed project's potential impacts on the historic integrity of the adjacent resource. Historic integrity is the ability of a property to convey its historical significance and includes seven defined aspects: location, design, setting, materials, workmanship, feeling, and association.²³

The proposed project would not have any impact on the integrity of location, design, materials, workmanship, feeling, setting or association for the Civic Auditorium complex. The setting has already changed extensively over time since the building's construction in 1934. In the early 1930s the setting was defined with small single-family houses, through years of redevelopment the setting has transformed to an area featuring large civic and office buildings. Even though the proposed project will introduce a much taller building than the existing Parkside Hall and alter the existing character of the immediate surroundings, it will not impact the ability of the historic Civic Auditorium complex to convey its significance. For a project to cause a substantial adverse change in the significance of the historic resource, it must demolish or materially alter in an adverse manner the physical characteristics that convey the resource's historic significance and accounts for its identification as a City Landmark. Through retention of integrity that convey their historic significance, the Civic Auditorium complex will continue to be listed in the San Jose Historic Resources Inventory. Therefore, the proposed project will not have an impact on the integrity of the historical resource.

Local Planning Regulations

Although the proposed project is partially compliant to the applicable 2019 Guidelines and Standards; the proposed project would not substantially impair the significance and integrity of the adjacent historic Civic Auditorium complex. No impacts have been identified or recommendations made per local standards and guidelines.

²³ National Park Service, *How to Apply the National Register Criteria for Evaluation, National Register Bulletin 15* (Washington, DC: United States Department of the Interior, 1997)44-45.

Summary Impacts Analysis

The proposed project will demolish the existing Parkside Hall which is not a historic resource as defined by CEQA; therefore, it would cause no direct impacts on any historic resources within the project site.

The proposed project involves alterations to the features of the previously identified historic resource, the Civic Auditorium complex. The proposed project was found to be in compliance with the Standards; therefore, the project is found to have a less-than-significant impact on the historic resource.

The activities related to the physical undertaking of the project would have the potential to physically damage the adjacent historic resource. With implementation of recommended mitigation measures, the potential for project construction-related impacts to the identified historic resource would be reduced to less-than-significant.

The Civic Auditorium complex could be indirectly affected by the project as a result of alteration of its immediate surroundings. Even though the proposed project will introduce a much taller building, it will not impact the overall ability of the Historic Civic Auditorium complex to such a degree that it no longer conveys its significance. Therefore, the proposed project will not have an impact on the integrity of the historical resource.

Although the proposed project is only partially compliant to the applicable 2019 Guidelines and Standards; it would not substantially impair the significance and integrity of the adjacent historic Civic Auditorium complex. No impacts have been identified or recommendations made per local standards and guidelines.

10. CONCLUSION

The proposed project will demolish the existing Parkside Hall which is not a historic resource as defined by CEQA. As such the proposed demolition would cause no direct impacts on any historic resources within the project site. Parkside Hall was found eligible to be listed as a Structure of Merit, and the City of San Jose encourages its preservation.²⁴

The proposed project entails constructing a 20-story building at the project site and alterations to the adjacent Civic Auditorium complex, a historic resource per CEQA. CEQA recognizes that generally, a project that follows the Standards shall be considered as having a less-than-significant impact on a historic resource. A review of the project compliance to the Standards found that the proposed project complies with Standards 1-10; therefore, it does not have the potential to impact the historic integrity of the adjacent Civic Auditorium complex. The proposed project is considered as having a less-than-significant impact on the historic resource.

The proposed project design is not fully compatible with the *San José Downtown Design Guidelines and Standards* (2019, updated 2020). In summary, the proposed project does not fully comply with the applicable 2019 Guidelines and Standards, particularly with standard "Façade f" of Guideline 4.2.4. Even though the proposed project only partially complies with the local standards and guidelines, it would not substantially impair the significance and integrity of the adjacent previously identified property; the Civic Auditorium complex would continue to be listed as a City Landmark in the San Jose HRI.

²⁴ Archives & Architecture, *Historic Resource Project Assessment, Museum Place II Mixed-Use Project*, 36.

The activities related to the physical undertaking of the project would have the potential to physically damage the adjacent historic resource. With implementation of recommended mitigation measures, the potential for project construction-related impacts to the identified historic resource would be reduced to less-than-significant.

The Civic Auditorium complex could be indirectly affected by the project as a result of alteration of its immediate surroundings. Even though the proposed project will introduce a much taller building, it will not impact the overall ability of the historic Civic Auditorium complex to convey its significance. Therefore, the proposed project will not have an impact on the integrity of the historical resource.

11. AUTHORS' QUALIFICATIONS

This report has been prepared by Kimberly Butt, AIA, and Aysem Kilinc, Assoc. AIA, who exceed the Secretary of the Interior's qualification standards for professional in architectural history and architecture as published in the Code of Federal Regulations, 36 CFR Part 61.

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APPENDIX