



Dedicated to Preserving San José's Architectural Heritage

June 25, 2007

Department of Planning, Building and Code Enforcement
100 East Santa Clara Street, Tower Third Floor
San José, California 95113

Re: Draft EIR Comments—Coyote Valley Specific Plan

The Preservation Action Council of San José is dedicated to preserving San José's architectural heritage through education, advocacy, and events. We aim to integrate a strong commitment to historic preservation into the land use and development decisions of the City of San José that protects historic resources, as well as into the private decisions of property owners and developers. We try to bring owners and developers together to create historically sensitive projects that make economic sense.

As Executive Director of the organization, I am formally representing PAC*SJ in providing comments to the Draft EIR being prepared for the new development of the Coyote Valley between San José and Morgan Hill. I do so as a Historic Preservation professional, meeting the Secretary of the Interior's Standards to perform identification, evaluation, registration, and treatment activities with my field in compliance with state and federal environmental laws with the criteria of the National Park Service outlined in 36 CFR Part 61.

SUMMARY STATEMENT

Our organization has substantial concerns about the uniformity of the survey completed by Basin Research Associates, as well as the purpose of developing this rich cultural landscape—a general viewpoint cherished by many driving on Highway 101.

SPECIFIC COMMENTS

As identified in Section 4.5 on "Cultural Resources," the Coyote Valley DEIR evaluates archaeological to architectural cultural resources in the project area. PAC*SJ staff received from the City of San José addendum information that includes individual California State Office of Historic Preservation Primary Record (DPR) architectural survey forms as well as Appendix A architectural resource report completed by Basin Research Associates.

very many properties were accessed versus un-accessed. Many archaeological resources were evaluated, which does not provide a good evaluation for the cultural resources in this project. At an architectural level, it would be beneficial to see these contributing and non-contributing resources in the bigger picture of the site's new project development. Detail GIS maps are located in other sections of the DEIR from wildlife to hazards, and it would be beneficial to see historic architectural resources in these historic locations and how it relates to the proposed urban development seen in Figures 2.0-1 - 2.0-3, as well as how these resources will be impacted.

Besides the above details on the project, PAC*SI has concerns with the way resources were evaluated for the resources listed below, and what was included in the cultural resource report Appendix F. For one, the condition of a cultural resource is not a professional standard in evaluating if a resource is eligible or ineligible. For example, a resource could have high architectural integrity as well as be eligible for the National Register, and yet be in poor condition and dilapidated. On some resources, condition was a factor in evaluating the resource, clouding the judgment of a resource's significance. In addition, local significance is a component of the National Register of Historic Places, and many of the buildings evaluated in the cultural resource report seem to glaze over local significance.

Within the Coyote Campus Industrial Area (NCCIA) resources identified that need further clarification:

1. *Blanchard Road House A*—No current photos were recorded in the DPR for Blanchard Road House A, which is required. Historical information is mentioned in the DPR but not in the cultural resource report for this property.
2. *Blanchard Road House B*—The evaluation for Blanchard Road House B is unclear as to why this structure is ineligible. The DPR form (page 3) comments this house has a “high level of integrity” but yet in the second paragraph mentions that the structure is not eligible because it “lacks integrity.” This information is mentioned also in the report. Additionally, the evaluation comments that the house is a “typical” Bungalow and is not eligible because it is not a fine example. Historical information is mentioned in the DPR form but not in the cultural resource report for this property.
3. *Groesbeck/Puppo Farm Complex*—With orchards vanishing quickly from the Santa Clara County landscape, the Groesbeck/Puppo complex appears to retain much integrity from multiple fruit dehydrators to a simple barn.
4. *Lester Farm Complex*—The cultural resource report mentioned that Lester Farm is a significant complex because Henry Lester was a prominent Coyote Valley orchardist. It is clear that the complex has been altered, but because of the significance of Lester to the Coyote Valley, it would be important to save one of the two surviving resources of the Lester Farm. It is unclear why a 1956 fruit dehydrator building is considered to be “less than 50-years-old” when the building is physically 51-years-old. The second resource recorded in the report was a warehouse that dated to the period of significance, and it is unclear why this building is non-contributing. A 1999 City of San José evaluation for Ward Hill was attached behind the resource's DPR form in PAC*SI's packet where the Lester Farm scored high (36.44), making the resource a Structure of Merit or a Contributing Structure. This information was not incorporated into the cultural resource report evaluation, although included in Table 4.51 of the DEIR. If Lester is as significant as described in this report, it would be important on a cultural level to preserve the warehouse that stored Lester's products, and it dates to the period of significance.

the property as well as its buildings. In the evaluation, there is no mention if the structures on this farm are eligible to the City of San José's Heritage survey. The barn on the property "has minimal alterations" and should be evaluated as an eligible structure.

In the DEIR, the section dedicated to the Coyote Valley Urban Reserve (CVUR) lumps both architectural and archaeological resources together in the cultural resource report (pages 44-5). C*SJ would like to request that this be separated out if possible so there is consistency with the CIA section - avoiding additional confusion if it is a house site or a house that is being evaluated. Such examples of this confusion is the "Caywood House, at least 1872" and the Santino House, 1890s," which through its description continues to point out it is not an underground structure but more so a "house site" (Appendix F, BRA report, 54). As a DEIR evaluator, it is difficult to understand if all cultural resources identified are evaluated appropriately under CIA because of the sensitivity of archaeology, no DPRs were included in the packet received by C*SJ for these resources, and if there are above-ground structures here they are being excluded because of this confusion.

In addition to this written confusion, other resources need clarification and more research:

1. *100 Laguna Avenue*—Although the Coast Counties Gas & Electric Company Building is suffering from a severe case of demolition by neglect, it is unclear why this resource is not eligible. Thorough research on the historical significance of this particular company is lacking in the cultural resource report along with its importance to the Coyote Valley. There is no "validation" in this report to explain the premise that makes this structure contributing.
2. *8170 Monterey Road*—The Rodin/Turturici House is described as being ineligible due to additions that are not apparent in the DPR form. The report comments on the resource having "high integrity" and the fact that it has been compromised by alterations that are not apparent or described in the report or the DPR form.
3. *8125 Monterey Road*--The Coyote Depot Complex is a wonderful little historic district of structures—all contributing to the history of the railroad that came through Coyote Valley. According to the DPR forms and report, these structures all appear to have high integrity and PAC*SJ would like to recommend the whole district to be listed as a City of San José Landmark district, in addition to the National/California Registers.
4. *9550 Monterey Road*—Ramelli Ranch Houses are two paired bungalows that according to the cultural resource report have a "high level of integrity" and "appear unaltered and convey a feeling of substantial, competent workmanship." PAC*SJ disagrees with the evaluator that this property is ineligible, and asks how many paired bungalows are there in the Coyote Valley? Paired houses are common in subdivisions and neighborhoods, but not so much in a predominantly agricultural/railroad community, making these paired houses unique. Just because they are not a high-style bungalow does not make them ineligible, especially if they have high integrity as articulated in the resource's evaluation.
5. *9560 Monterey Road*—Fourteen Mile House/Peppin House Ruin is a historically significant structure to the Coyote Valley. Once again, condition is being used as a criterion for evaluation of eligibility and it should not be. Although the resource has been abandoned and is deteriorating, its history is there and appears to have high integrity, making it eligible for NR/CA Registers, in its current state.
6. *586 Monterey Road*—The Ketchum/Malech House is evaluated as being eligible to the National Register and possibly San José Landmark status, although it has been extensively altered.

to carport added to the building. How can this property be eligible to both the CA regi and San José inventory with this number of extensive changes? This demonstrates an inconsistency with other evaluated resources, and should be re-evaluated because these changes represent a significant loss of historic material.

7. *9690 Monterey Road*—Ross/Saso House is evaluated as a structure with a “high level historic integrity” by the evaluators, who continue to comment that the building is “an exceptional example of the Ranch House Style in the South San José/Morgan Hill area hence is not eligible to any form of designation. What was the criterion to make this structure ineligible in this area, and is there a survey of South San José/Morgan Hill ranches that was used as a comparison?
8. *9770 Monterey Road & 9798-9796 Monterey Road*—The Masamichi Kawanami House (1939), Calvin Kawanami House (1953) were owned by Japanese orchardists and are owned by the Kawanami children. This family seems to be of importance to the Coyote Valley because there is more than one house dedicated to this family. Is there any historical context to Japanese Americans in the Coyote Valley? What is the history of this particular family to the Coyote Valley to make their properties have a “high level of historic integrity” yet are not eligible for the National Register/California Register/City of San José inventory? As a Spanish Colonial Revival and Ranch House with high integrity, how many of these types exist in the Coyote Valley, and why are these two buildings compared to South San José and Morgan Hill—two communities that had no connection with this lone town?
9. *9940 Monterey Road*—The Barnhart/Saso House is a significant resource as it was on the site of a railroad station. The evaluation of this property is confusing, and needs clarifying. According to the cultural resource report, the Barnhart/Saso House has “a low degree of integrity,” yet has been altered by the “replacement of the original double-hung wood sash windows were replaced with vinyl sash, the replacement of the chimney on the front, west-facing roof slope with a wood frame structure encasing metal flues; the replacement of the original porch steps with concrete steps; and the addition of two dormers at the rear.” These are substantial changes, especially replacement of windows with vinyl. How can this structure be eligible to the National/California Registers, in addition to being a City of San José Landmark? Please explain this.
10. *595 Palm Avenue*—The Costa House, 1914, according to the cultural resource report has a rich history in prune farming as well as active in the Coyote community as charter members of the Coyote Grange (see Appendix F, 77). In addition to the history, the garage/residence, house, and three drying sheds are “intact” as cultural resources. The evaluation continues in the next paragraph to say “the house, garage, and the related drying sheds do not appear to retain historic integrity as a farm complex from the early years (1914-1920) because of the removal of some buildings and the addition of other buildings.” How can what exist not be eligible if it has high integrity and is intact due to a changing context? What makes the Costas family not significant to the Coyote Valley?
11. *602 Palm Ave*—Ducoty/Christopher House, 1920 was evaluated for the National/California Registers but what about as a City of San José Landmark?
12. *607 Palm Avenue*—Spaich Bros. Help House. Circa 1920s is another house cited as “unaltered except for the replacement of the front door,” although in “poor condition.” Again, condition is not a criterion for evaluating a structure. The architectural description of this house describes a solid example of a Craftsman bungalow which retains its original windows. Please explain what architecturally made this structure ineligible. Coyote Valley

addition, please evaluate this structure for eligibility for the City of San José inventory.

13. *601 Scheller Road—Worker’s House/Vianelle House, c. 1930s—Lot 45, Mary Murphy Colombet Sub No. 2* is a small house on a plotted lot in the town. According to the evaluation, the house dates to 1918, and it is unclear where the “c. 1930s” date comes if the house is historically older. The evaluation continues to cite the house as connected to the California Seed Growers Association, and this house was probably a worker house for the company. Italian settlers from the Bevilacqua to the Vianelle family lived in the area and it may be that this section of Coyote Valley has cultural significance to Italian-Americans, which should be further investigated by the evaluators. Please remove the word “cheap” from the architectural description of the house because it is judgmental and not a professional word to use in describing a resource. In addition, the evaluation goes on to say, “the small, modest house at 601 Scheller Road retains historic integrity, the house is a typical example of a Bungalow Style residence in South San José/Morgan Hill area, it does not appear to be eligible” (Appendix F, 80). The cultural resource report is constantly comparing the Coyote Valley buildings to the “South San José/Morgan Hill areas which is not germane. Last, please evaluate the structure in connection to the San José Landmark inventory.

In conclusion, PAC*sj noted many inconsistencies between the DPRs, the cultural resource report formed by Basin Research Associates, and the Draft Coyote Valley DEIR. Predominantly the report was used to clarify the serious inconsistencies since that would be what the public and San José would use if they were evaluating one of these resources under a site-specific CEQA compliance for possible demolition. This report, in the eyes of PAC*sj, should clarify if the structures are eligible or ineligible under the National/California Registers as well as San José historic inventory.

In addition to cultural resources, historic preservation takes on the visual changes to the Coyote Valley that this development will have and how those changes will affect cultural resources. The Coyote Valley DEIR comments in Section 4.10 on the “Visual and Aesthetics” of the development state that it will be a **significant impact** on this cultural landscape. Figure 4.10.1 and Figure 4.10.2 demonstrates this well with tall buildings surrounded by lower structures that will only invite the creation of taller buildings and more development, devastating its current appreciation. Taller buildings will not bring back the “green” of this landscape and PAC*sj agrees immensely with the DEIR that this is a significant impact, and if development occurs, will be an unavoidable fact.

The view of the Coyote Valley, either in the dark or in light, is breath taking and reminiscent of California and its agricultural and railroad history. The soil in this area is rich with nutrients and centuries of farming from the Native Americans to the present. In the eyes of PAC*sj, urban development should be kept within cities where it belongs, and not in undeveloped cultural landscapes such as the Coyote Valley. The development of the Coyote Valley seen in this DEIR is an unnecessary sprawl, and the ultimate destruction of the whole principal of Smart Growth and the creation of Urban Growth Boundaries.

Urban Growth Boundaries and Smart Growth are principles that have been adopted by many counties in the nation including San Jose in order to control urban development and sprawl. Many of these very principles are used in agricultural areas. In addition, the City of San Jose

v San Jose has grown and spread dramatically as a city from 1965 to the present can be found on this city's Smart Growth website, demonstrating geographically the mowing down of much of the city's rich cultural landscapes with the creation of structures, roads, and parking lots.¹ The City of San Jose's Urban Growth annexation shows the city gobbling up rich farmland for eager development purposes. Urban Growth boundaries are created for reasons— to ensure that growth happens in a controlled manner - via the use of urban planning and zoning laws, and should not be used irresponsibly as a greenfield for the creation of little cities, like what is happening in the Coyote Valley.

The development of the Coyote Valley will cause significant, irreversible impacts to this developed landscape in a myriad of ways and should be avoided.

Respectfully submitted,

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Executive Director

http://www.sanJoseca.gov/planning/smartgrowth/Annex_1860-2000.pdf

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