

January 25, 2021

Charu Ahluwalia, Associate Planner  
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RE: Bonair Siding Corporation Yard District Evaluation – Response to Peer Review

Dear Charu Ahluwalia,

In November 2020, Page & Turnbull was contracted by Stanford University to prepare revisions to a previously submitted study of the Bonair Siding complex, which was determined to be incomplete following peer review by Michael Hibma, M.A., AICP, of LSA Associates. On October 30, 2020, Mr. Hibma issued a memorandum regarding Peer Review for the Land, Building, and Real Estate (LBRE) Replacement Building Project, Leland Stanford Junior University, Santa Clara County, California. Accordingly, Page & Turnbull reviewed the comments and recommendations provided by LSA, and along with Stanford University staff, participated in a virtual meeting with the County and LSA on December 7, 2020 to confirm an approach to formatting the deliverable and developing the district boundary.

We have prepared a revised study, which has been formatted using State of California Department of Parks & Recreation (DPR) Primary Record, District Record, Location Map, and Continuation Sheets to record the potential Bonair Siding Corporation Yard District, and Primary Record, Location Map, and Continuation Sheets to record each of the eight (8) resources within the potential district.

The district and its resources are evaluated within the District Record per direction provided by LSA. In the process of amending the study, Page & Turnbull conducted archival research at repositories of Stanford University and online to develop a history of the potential District, which places the District in context with patterns of historic development at Stanford University and offers additional context relating to the architectural character of the District. Additional photographs and views of the buildings and structures within the district are provided, as well as evidence supporting the chosen study area, or District Boundary. Josh Bevan of Page & Turnbull, a cultural resources planner with a M.S. in Historic Preservation from the University of Pennsylvania and over four years of experience in cultural resources planner and architectural history in California, was the primary author. All Page & Turnbull staff contributing to the revised study meet the Secretary of the Interior's Professional Qualifications Standards for architectural historians (48 CFR 44716).

Our evaluation determined that the potential Bonair Siding Corporation Yard District (District) does not appear to be eligible for listing on the California Register of Historical Resources (California Register). Additionally, evaluation of the individual, age-eligible resources within the District concluded that none of the individual resources appear to be individually eligible for listing in the California Register. Please see below for response to comments and recommendations provided by LSA on the previously submitted evaluation, which was found to be incomplete.

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- 1) *There is an assumption that the reader has previously reviewed other surveys, historic contexts, and other supporting materials before reviewing the DPR 523 form record.*

Recommendation: The evaluation should provide a more robust presentation of relevant historical context and provide additional analysis under each of the four California Register evaluative criteria to bolster the findings. This information may come from previously prepared cultural resource and land use planning studies as well as other primary and secondary sources to inform the reader. Additional supplemental research may be required. Sources that may contain information about Bonair Siding Complex may include (but not limited to) the "Maps & Records" facility which is conveniently located on campus within Building 09-110 (327 Bonair Siding), the Stanford University Archives & Special Collections, the Online Archive of California, and consulting staff at the Bonair Siding Complex.

Response: Page & Turnbull has conducted additional, intensive archival research of Stanford University repositories and analysis of relevant archival materials to support findings presented in the evaluation section. Additionally, the evaluation section has been expanded to include discussion of each criterion to discuss potential eligibility of the potential district and for each of the resources within the district, as applicable.

- 2) *The evaluation does not discuss whether or not the Bonair Siding Complex and the other detached buildings included within the evaluation appear to constitute a district.*

Recommendation: The evaluation should be revised to address whether or not the remaining existing buildings and corporation yard that comprise the Bonair Siding Complex constitutes a district (in whole or in part), as defined by National Register Bulletin 15. The DPR 523 form record should discuss architect Eldridge T. Spencer and his role (as well as the roles of other design professionals who collaborated with him) in designing the Bonair Siding Complex.

Response: To address this recommendation, Page & Turnbull has prepared an updated evaluation using State of California (DPR) Primary Record, District Record, Location Map, and Continuation Sheets to record the potential district and its resources. The boundary of the potential district was determined per the guidance of the National Park Service's Bulletin 15, and all survey forms were completed per the guidance of California Office of Historic Preservation bulletins. Biographical information relating to the life and career of Eldridge T. Spencer, and other identified design professionals associated with resources within the potential district has been provided in the updated evaluation.

- 3) *The architectural styles of the Bonair Siding Complex built environment should be examined.*

Recommendation: The evaluation should assess the architectural context of Bonair Siding Complex and explain, using other examples, why it is or is not a representative specimen of the Vernacular style.

The evaluation should also address whether or not Building 09-100 (315 Bonair Siding) is a representative example of Modern architecture. Recommend consulting plans, papers, plans, blueprints, archived collections of the architect's professional works, architectural style guides, and other appropriate sources to inform an analysis of the building's architectural qualities.

Response:

The updated evaluation provides context relating to Mid-Century Modern architecture and Vernacular architecture, to support the analysis of each resource within the potential district. Page & Turnbull conducted additional archival research of available building plans on file with Stanford University's Maps & Records division and has cited scholarship referenced to inform analysis of each resource's architectural qualities.

4) *The analysis for significance under California Register Criterion 3 appears incomplete.*

Recommendation: The evaluation should address potential significance for association(s) with prominent design professionals (i.e., architects and/or manufacturers).

Response: Page & Turnbull has provided expanded Criterion 3 discussions for the potential District and each individual resource within the district, as applicable. Information relating to identified design professionals and a discussion of each resource's association to those professionals is provided in the updated evaluation.

5) *The DPR 523 form record appears to lack a discussion of any alterations to the Bonair Siding Complex.*

Recommendation: The evaluation should document a review of relevant information regarding notable alterations to the Bonair Siding Complex and associated secondary buildings, and an assessment of the effects of such changes of physical integrity of materials, workmanship, and design. Examples of types of information include, but are not limited to, copies of the original blueprints, correspondence with design professionals, media releases, subsequent work orders, and other information about such modifications to the Bonair Siding Complex that may be on file at the Campus Planning Department, Public Information Officer, or with the Campus Architect (or equivalents). Additional research could be undertaken at the "Maps & Records" facility which is conveniently located on campus within Building 09-110 (340 Bonair Siding).<sup>11</sup> Use Continuation sheets if needed to list alterations.

Response: Following additional recordation with digital photography, archival research of collections held by Stanford University's Maps & Records division, and review of available aerial photographs, a construction chronology documenting changes to the Bonair Siding Corporation Yard and the eight resources within the potential district has been provided.

6) *The DPR 523 form record lists two different associative themes for significance.*

Recommendation: The evaluation should be consistent in themes that inform the context.

Response: The evaluation has been updated with Theme identified as "Collegiate Architecture in the San Francisco Bay Area during the Post-World War II Period." This theme aligns with the post-World War II period during which time the Bonair Siding Corporation Yard was originally developed, and accurately describes the potential district's location. Context relating to trends in collegiate architecture, modernism, and specific architectural styles for collegiate campuses in the San Francisco Bay Area has been provided to support evaluation of the district and its individual resources under applicable criteria.

7) *The DPR 523 form record is missing required information.*

Recommendation: The evaluation should address the information gaps identified above [see letter] and the DPR 523 form record should be revised per official Office of Historic Preservation guidance.

Response: To provide all required information and record the subject resources correctly per California Office of Historic Preservation Guidance, Page & Turnbull reviewed applicable bulletins for recording historic resources using State of California DPR Forms. Additionally, Page & Turnbull staff, Stanford University staff, and LSA staff participated in a conference call on December 7, 2020, to confirm direction to reformat the evaluation into provided format using a District Record, Primary Records, Location Maps, and Continuation Sheets. All applicable fields from the DPR Form 523B:Building Structure and Object Record used for the previously submitted application have been adapted to the provided District Record form. Dates of construction, location maps and their titles, UTM references, additional pictures of each resource with descriptive captions, and maps illustrating the district and the evaluated resources have been provided to correct missing information identified in the previously submitted evaluation.

8) *Miscellaneous*

- The DPR 523 Primary Record form includes a picture of Building 09-100 (315 Bonair Siding) and in the citation information at item P5b states this photo was taken on January 31, 2020. However, there are directional arrows near the center of the photograph which indicates this image is a Google Street View image taken of Building 09-100 from this vantage point with a time stamp of May 2019. Please revise with current photograph or revise citation in line P5b. Description of Photo.
- Several places in the DPR 523 form record depict a " "following sections of text. It is not clear what this symbol signifies, but it is likely indicates spillover text will populate a formatted text box onto another page. However, several instances where this symbol is

present, the remaining text is cut off and appears missing from the DPR 523 form record. Several examples are:

- Primary Form, item P6. and P.7;
- BSO Form, item B10.
- The DPR 523 form record would benefit from a review by a technical editor for readability.

Response: Page & Turnbull has updated the evaluation's Primary Record forms with more recent photos with accurate captions and accurate dates of recordation. All text has been formatted to be legible and previously identified technical, grammatical, and typographical errors have been corrected or replaced.

Thank you for your review of the updated DPR Forms,



Josh Bevan, Cultural Resources Planner, Primary Author of DPR Forms

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