

County of Santa Clara
Department of Planning and Development
County Government Center, East Wing, 7th Floor
70 West Hedding Street
San Jose, CA 95110
Phone: (408) 299-5700
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September 21, 2021

****Sent via email ****

Michael Mithen
Stanford University
340 Bonair Siding
Stanford, CA 94305
Email: mithen@stanford.edu

FILE NUMBER: PLN21-011
SUBJECT: Architecture and Site Approval (ASA) and Grading Approval -
Graduate School of Education (GSE) Project
SITE LOCATION: 485 N Lasuen Mall, Stanford, CA 94305
DATE RECETVED: 08/23/2021

Dear Mr. Mithen:

Your application for Architecture and Site Approval (ASA) and Grading Approval is **incomplete**. For the application processing to resume, you must resolve the following issues and submit the information listed below. Additional issues of concern that may affect staff's recommendation will be provided in a separate communication.

Please note that the Department is only accepting electronic submittals due to COVID-19 closures. Please refer to procedures for Planning Resubmittals available on the County website at

<https://www.sccgov.org/sites/dpd/Iwantto/Permits/Pages/PlanningResubmittals.aspx>.

If you have any questions about the information being requested, you should first call the person whose name is listed as the contact person for that item. He or she represents a specialty or office and can provide details about the requested information.

AN APPOINTMENT IS REQUIRED FOR THIS RESUBMITTAL.
PLEASE CALL ME AT (408) 299-5740 TO SCHEDULE AN APPOINTMENT.

Please submit a complete revised plan set and a *written response* with the resubmittal materials, addressing the following items. All items must be addressed and included in the resubmittal.

PLANNING

Contact Charu Ahluwalia at (408) 299-5740 or charu.ahluwalia@pln.sccgov.org for information regarding the following items.

Incomplete Comments from JRP Peer Review:

1. Submit an updated historic evaluation for School of Education North Building, which must include identification of interior character-defining features, if any, explicitly describing any such features identified. Without this, the project cannot be adequately assessed for impacts. This is a repeat comment from JRP peer-review memo dated February 26, 2021, comment #4.

Further, per JRP comment #1 in the attached memo dated September 10, 2021, please also note that because the project proposes a major alteration to the historic North Building, a thorough identification of its attributes, contributing elements, and character-defining features are required, but neither the original 2009 evaluation, nor the 2017 update, provide the necessary specificity and do not meet standard practice for evaluation. The 2009 evaluation identified a Period of Significance from 1938 – 2008 without justification of that lengthy period. This period of significance is not appropriate for a resource eligible for its architecture and in fact, could mean that all alterations and updates made to building up to 2008 could be considered character-defining. The 2017 update does not provide any justification for the period of significance it identifies it as 1900 – 1924, which is wholly inappropriate for a building constructed in 1938. These evaluations need to be updated with clarifications that properly define a period of significance, without which no character-defining features can be justifiably identified or defined. It is standard practice to conduct updates of previous cultural resources evaluations. The California Public Resources Code recognizes the importance of updating surveys that are greater than 5 years old before listing any properties in the California Register of Historical Resources (CRHR). For a major project that will alter an historical resource, this principle should be applied here in order to identify a proper period of significance, as well as a complete list of character-defining features of the historic North Building and the level of its significance (i.e., local, state, or national).

2. Per JRP comment #2 in the attached memo dated September 10, 2021, revised evaluation for the Old Store and Old Bookstore in response to prior incomplete comments conclude that neither of the structures individually meet the significance criteria. However, the evaluations for these structures must be updated to address their potential to be contributors to a larger historic district should one be identified. This is because historic-era buildings can contribute to districts even when not individually significant.

LAND DEVELOPMENT AND ENGINEERING

Contact Ed Duazo at (408) 299-5733 or ed.duazo@pln.sccgov.org for more information regarding the following items:

3. An updated C.3 Questionnaire has been submitted; however, there are a few issues/discrepancies in the updated questionnaire. Please address the following:
 - a. Item 5.a. (Hydromodification Management (HM) Applicability) indicates that the project is exempt from HM because the project will not create/replace more than an acre of impervious area and the total post project impervious area is less than the pre-project area. However, based on the totals in the Project Size table, the project will create/replace more than an acre of impervious area and the post-project impervious area will be greater than the pre-project area. Revise Line Item 5.a. accordingly.
 - b. Item 6 notes only one Site Design Measure (“Other self-treating area”) incorporated in the project design. Is this the only site design measure provided? Self-treating areas generally cannot accept run-off from impervious areas, and there are several impervious walkways immediately adjacent to pervious areas. Are these pervious areas self-treating areas, or self-retaining areas? Please review. Should the Silva Cells be identified as a site design measure?
 - c. Item 6 indicates that no Low Impact Development (LID) Treatment is being provided; however, this is incorrect. LID Treatment is being provided by the regional facility. Revise the Treatment Measures section accordingly. “Rainwater harvest/use” and/or “Other” should be selected under LID Treatment. If “Other” is selected, then reference the regional facility.
 - d. The East Campus Regional Facility was sized base on the California Stormwater Quality Association Best Management Practices (CASQA BMP) Handbook Method (1.b.). Please revise Item 7 in the questionnaire accordingly.
4. Sheet C.401 indicates that the pavement modifications east of the gap between the buildings is covered under the Lausen/Escondido Circulation Improvements. However, this is not consistent with Sheet C6.00. Review/revise accordingly. (Note: The plans included with the grading permit submittal for the Lausen/Escondido Circulation Project are consistent with Sheet C6.00.)

FIRE MARSHAL

Contact Alex Goff at (408) 299-5763 or alex.goff@sccfd.org for more information regarding the following items:

5. Revise inconsistencies in the plans (for example, fire hydrants on sheets AA0.4 and C7.01 appear to be different). Information provided on all plan sheets must be consistent.
 - a. A fire hydrant is to be located within 100 ft. path of travel to the Fire Department Connection (FDC).
6. Plans show an existing Building Mounted FDC with a proposed working pressure of 169 psi. Per previous email conversations, the plans will need to show an FDC with a normal operating pressure (not above 150) located along Lasuen Mall.

If the requested information is not submitted within 180 days, you will be required to pay a fee of 10% of the application fee at the time the information is submitted. All requested information must be submitted within 1 year of the date of this letter and will not be accepted after 1 year. PARTIAL RESUBMITTALS WILL NOT BE PROCESSED. Fees required at the time of resubmittal will be those in effect at that time.

In submitting this land use application, the owner/applicant included an initial application fee. As of the date of this letter, approximately 55% of the fees paid have been exhausted.

If you have any additional questions regarding this application or would like to meet to clarify Planning's incomplete comments, please call me at (408) 299-5740.

Sincerely,

Charu Ahluwalia

Charu Ahluwalia
Associate Planner

cc: Leza Mikhail, Interim Planning Manager
Manira Sandhir, Principal Planner
Ed Duazo, LDE
Alex Goff, FMO

Attachment 1: JRP Peer-Review Memo dated September 10, 2021

MEMORANDUM

September 10, 2021

TO: Charu Ahluwalia, Santa Clara County Office of Planning and Development
FROM: Meta Bunse, JRP Principal
Heather Norby, JRP Senior Historian
RE: Stanford Graduate School of Education Peer Review, Historical Resources

On February 26, 2021, JRP Historical Consulting, LLC (JRP) submitted a peer review of the historic architectural (built) resources evaluations and Statement of Compatibility (SOC) for the Graduate School of Education Project on the Stanford University campus to assist the Santa Clara County Office of Planning and Development. Stanford provided revisions to sections of the historic evaluations, SOC, and plan set in response. This second peer review examines the revised SOC and its attachments for adequacy of compliance with the historical resources requirements and conditions of the Stanford General Use Permit and Stanford Community Plan, both dating to 2000.

The project proposes a major renovation to the historic School of Education North Building, a building that is eligible for listing in the California Register of Historical Resources (CRHR), demolition of a modern-era building and construction of a new four story building next to a single story building dating to 1913 that has been evaluated as not individually eligible for listing the CRHR. The renovation to the School of Education building, referred to in the plan set as “North Building” proposes major interior renovations and construction of a glass intervention at the south courtyard that would require demolition of the south wall of the historic North Building facing the south courtyard, demolition of the North Building roof slope facing the south courtyard, demolition of the North Building central hip roof, and demolition of the interior of the central portion of the North Building. Changes to the basement level are also proposed on the north side of the North Building.

This memorandum and the attached comment/response table provide specific JRP peer review recommendations for the revised SOC. The following summarizes the main review conclusions, and does not include each comment/response listed in the table:

1. The identification documents for the historic School of Education North Building are inadequate. Because the project proposes a major alteration to the historic North Building, a thorough identification of its attributes, contributing elements, and character-defining features are required, but neither the original 2009 evaluation, nor the 2017 update, provide the necessary specificity and do not meet standard practice for evaluation. The 2009 evaluation identified a Period of Significance from 1938 – 2008 without justification of that lengthy period. This period of significance is not appropriate for a resource eligible for its architecture and in fact, could mean that all alterations and updates made to building up to 2008 could be considered character-defining. The 2017 update does not provide any justification for the period of significance it identifies it as 1900 – 1924, which is wholly inappropriate for a building constructed in 1938. These evaluations need to be updated with clarifications that properly define a period of significance, without which no character-defining features can be justifiably identified or defined. It is standard practice to conduct updates of previous cultural resources evaluations. The California Public Resources Code recognizes the importance of updating surveys that are greater than 5 years old before listing any properties in the CRHR. For a major project that will alter an historical resource, this principal should be applied here in order to identify a proper period of significance, as well as a complete list of character-defining features of the historic North Building and the level of its significance (i.e., local, state, or national). The updated evaluation must include identification of interior character-defining features, if any, explicitly describing any such features identified. Without this full identification of the aspects of significance and character-defining features, the project cannot be adequately assessed for impacts.
2. It is acknowledged that the revised evaluation concludes that Old Store and Old Bookstore do not individually meet the significance criteria; however, the evaluations should address their potential to be contributors to a larger historic district should one be identified. This is because historic-era buildings can contribute to districts even when not individually significant.
3. The project proposes major demolitions to the existing historic School of Education North Building. Please provide demolition plan drawings in the plan set, including protective measures to be applied to remaining historic materials and/or character-defining features of the historic building.
4. The SOC relies upon examples of additions that are compatible with historic buildings that are not analogous to the proposed project. Some of the examples provided are additions rather than renovations, in particular the examples shown in Figures 15 through 17. These exhibits demonstrate effective use of glass for additions to historic buildings but these projects do not appear to demolish historic fabric to the degree that this project proposes to demolish. The examples of glass interventions that are a more similar action to the proposed project that are shown in Figures 18 and 21 are more

compatible and responsive to the existing building than the proposed project (see next comment).

5. The project proposes to demolish the south wall of the historic North Building facing the south courtyard, the pitched roof above that wall, the hip roof component at the center of the building, and the interior of the central section of the building. The project proposes to replace the central roof and the roof facing the south courtyard with a flat roof. Demolishing what is presumably the original and character-defining roof form and introducing a flat roof form would cause a loss of historic integrity of the original design and materials of the building and does not comply with the Secretary of the Interior's Standards that state that the historic character of a property shall be retained and preserved and alterations shall not destroy historic materials that characterize the property. In addition, demolition of these roofing components and replacement with a flat roof does not meet the SOI Standard that require new construction to retain the essential form and historic integrity of the property in the event that the new construction was to be removed in the future. Note that the examples of the glass wall intervention at Cabell Hall did not alter the roofline (Figure 18 as presented cuts off the intact roofline but the full view is available online) and the glass wall intervention at Pier 5 was sympathetic to the three-part parapet on the streetside of the building. JRP recommends lowering the height of the glass intervention to below the existing eaves and retaining the original roof forms and original roof/wall junction and cornice.
6. The shade structure at the proposed curtain wall does not meet SOI Standards because it introduces a horizontal element to the wall where the original design did not have any such horizontal element. The original design of the building features two symmetrical courtyards that read as U-shaped spaces. The horizontally projecting shade structure would interrupt the open courtyard and is not sympathetic to the original design. Note the example of Cabell Hall that does not introduce any projections to the glass intervention. JRP recommends removing the shade structure from the design.
7. JRP agrees the design revisions to the arrangement of the glass curtain wall panes is more compatible with the tall and narrow dimensions and proportions of the extant south-facing windows.
8. The project proposes to depress the courtyard on the north side of the existing Graduate School of Education building. This would require replacing what is presumed to be an original door with a window and creation of a basement level entry. These actions cannot be fully analyzed without clearly defined character-defining features (see Comment #1); however, this action may meet SOI Standards because the alteration is compatible with the architectural features and massing, size, and scale of the original building.
9. Introduction of contrasting paint colors to the west side of the new South Building is not compatible with the monochromatic buff exterior color scheme of the adjacent historic buildings.

10. For compatibility with nearby historic buildings that display more architectural elaboration on their main façades (that front primary circulation routes), JRP recommends making revisions to the design of the west façade of the South Building to differentiate it from the other sides of the building so that it is more clearly anchored to Lausen Mall.

As the alterations to the historic School of Education North Building are currently designed, JRP believes that this project is likely to diminish the historic integrity of the building to a degree that it would no longer be eligible for listing in the CRHR. This would likely constitute a significant adverse change to the historic School of Education North Building.

The MSWord version of the comment/response table is provided for use in subsequent rounds of review and comment. Please provide all subsequent comment response table submittals using that MSWord file so that it does not need to be recreated from a pdf or other format. Thank you.

Attachments

Peer Review Comments Table

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
SOC 1	2	Two separate evaluations, one for Old Bookstore, and one for Old Store need to be prepared before this conclusion can be reached. Old Bookstore in particular has potential for eligibility.
	Stanford	See enclosed Page & Turnbull memo dated 8/13/2021 (Page & Turnbull Response to JRP - 1) and revised DPR forms.
	P&T	The updated DPR forms provide an individual evaluation of each the Old Bookstore and the Old Store.
	JRP	JRP notes that Page & Turnbull has updated the DPR forms to include individual evaluations of each building. This revision adequately addresses the original peer review comment.
SOC 1	2	The 1910 building (Old Store) is not an addition. It was constructed as an entirely separate building.
	Stanford	See Page and Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The updated DPRs clarify that the Old Store was built as a freestanding building next to the Old Bookstore and was connected to the Old Bookstore in 1929.
	JRP	The clarifications to the building histories of Old Store and Old Bookstore adequately address the peer review comment.
SOC 4	5	See previous comments. Barnum has been inappropriately evaluated as a single unit. The Old Bookstore and Old Store need to be individually evaluated.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	JRP	The individual evaluations of each building adequately addresses the original peer review comment.
SOC 4	5	I am not finding the direction in the CP/GUP that the project does not need require assessment of compatibility with properties outside the project site that have not been previously determined to be potentially eligible for listing in the CRHR. If new construction will occur within the setting of an eligible resource, compatibility should be addressed.
	Stanford	All campus buildings over 45 years old have been evaluated by Stanford in the 2017 Historic Survey (and in some cases in prior evaluations); character-defining features have been identified for all eligible buildings. There is no unevaluated age-eligible property in the setting.
	JRP	Acknowledged. JRP recommends revising the text to clarify that there are no unevaluated buildings in the immediate vicinity of the project.
SOC 9	10	It is clear that the curtain wall would be differentiated from the original building; however, it is not apparent how the curtain wall is compatible with or harmonious with the design elements of the existing building as required to meet SOI Standards and comply with Preservation Brief 14. See project drawing AA2.3.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	Stanford	Stanford appreciates the comments from JRP. Stanford has modified the spacing, pattern and size of the glass panes and mullions in the glazed curtain wall to be more responsive to the existing adjacent south-facing windows. The curtain wall's mullion and muntin pattern has been redesigned to reflect the dimensions and proportions of the original metal windows; each bay is now sub-divided into four glass panes instead of three. Please refer to pages 12-14: Standard #1, pages 16-24: Standard #3, of the updated Statement of Compatibility (SOC-2, August 20, 2021).
	JRP	JRP agrees the design revisions to the glass curtain wall are more compatible with the tall and narrow dimensions and proportions of the extant south-facing windows.
SOC 10	11	The evaluation needs to clarify whether there are interior character-defining features before this action can be assessed for compatibility.
	Stanford	The interior elements are not character-defining features in either previous evaluation of the building (2009 or 2017). The County and Stanford agree that interiors of campus buildings whose program is public-facing may be character-defining (see list). "Private" interiors are not. The GSE North Building contains classrooms, offices and a library that serve its private educational activities and are only incidentally open to the public.
	JRP	JRP acknowledges that the North Building does not have any spaces that Stanford considers public, and therefore does not consider any interior elements of GSE to be character-defining. Status of interior character-defining features needs to be clarified in an updated DPR 523 form (see Comment Response to SOC Attach. 4A-1).
SOC 11	12	Clarify if retaining the façade and retaining the auditorium is related. Could the auditorium be eliminated while retaining the facade?
	Stanford	Please refer to pages 12-14: Standard #1, of the updated Statement of Compatibility (SOC-2, August 20, 2021).
	JRP	Revised SOC clarifies that the project purpose requires elimination of the auditorium to create a design that allows for modernized teaching philosophy that emphasizes student gathering spaces and collaboration.
SOC 11	12	If Old Bookstore is found eligible, this action could be considered restorative because the bookstore was built first and stood alone until 1910.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The evaluation of the Old Bookstore is based upon its existing condition and the existing setting, not a potential future setting of a project yet to be completed.
	JRP	The original comment was intended to provide guidance to the SOC analysis if the building was found eligible. No action is needed.
SOC 12	13	Have alternatives been considered?

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	Stanford	Alternatives were considered but they did not support the program aspirations of the school. Referto pages 12-14: Standard #1, of the updated Statement of Compatibility (SOC-2, August 20, 2021).
	JRP	Revised SOC clarifies that the proposed design is necessary to support the purpose of the project.
SOC 13	14	This action cannot be analyzed for impacts because the supporting CRHR evaluation does not address if thereare interior character-defining features and what they might consist of.
	Stanford	The interior elements are not character-defining features. See response to PDF page #11 above.
	JRP	JRP acknowledges that GSE does not have any spaces that Stanford considers public or character-defining. Status of interior character-defining features needs to be clarified in an updated DPR 523 form (see Comment Response to SOC Attach. 4A-1).
SOC 20	21	Needs more supporting analysis to show how this glass addition is compatible and harmonious with the original design. As it reads, it sounds as though any addition using glass is acceptable. While we can generally agree that glass is an acceptable material, this needs to demonstrate how the <u>design</u> of the addition is compatible/harmonious with the original. The proposed addition shows the glass divided into small units which creates a starkly different visual impact than the appearance of the expansive smooth wallsurfaces of the original building, and the pattern of original window openings. Consider revising pattern of panes to echo that of the historic building.
	Stanford	Stanford appreciates the comments from JRP. Similar comments were also provided by County Planning Staff. Stanford has modified the spacing, pattern and size of the glass panes and mullions in the glazed curtain wall to be more responsive to the existing adjacent south-facing windows. The curtain wall’s mullion and muntin pattern has been redesigned to reflect the dimensions and proportions of the original metal windows; each bay is now sub-divided into four glass panes instead of three. Please refer to pages 16-24: Standard #3, of the updated Statement of Compatibility (SOC-2, August 20, 2021).
	JRP	JRP agrees the design revisions to the glass curtain wall are more compatible with the tall and narrow dimensions and proportions of the extant south-facing windows.
SOC 21	22	Agree on all counts that the plans for the new South Building meet applicable standards. The design and scaleof the building complement the existing North Building, and the scale of the new construction is appropriate for the setting.
	Stanford	Stanford agrees with JRP’s assessment; no further comment.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
SOC 29	30, Review Summary	<p>Barnum Center buildings need to be evaluated individually for CRHR eligibility. The Old Bookstore has high potential for eligibility when considered separately. We recommend that Stanford either revise the DPR 523 form set for Barnum Center to indicate that two buildings, Old Bookstore and Old Store, are evaluated on the form (and one modern building in the immediate setting does not require evaluation); or, prepare two separate DPR 523 forms, one for Old Bookstore and one for Old Store.</p> <p>If Old Bookstore is eligible (likely because of significance and historic integrity), the project would be restorative because it would demolish the Old Store that was built 5 feet away from Old Bookstore after its original construction.</p> <p>If Old Store is eligible (less likely because of loss of historic integrity), the project would demolish an historical resource.</p> <p>The California Register of Historical Resources (CRHR) evaluation of North Building needs to specify whether there are interior character-defining features, and if so, what they are. Without this, the potential project impact of removing the auditorium cannot be adequately analyzed.</p> <p>Confirm that all evaluations were conducted by professionals who qualify as Historians or Architectural Historians under the Secretary of the Interiors Standards.</p> <p>The glass addition proposed for the North Building courtyard is clearly differentiated from the original building; however, the SOC does not provide sufficient analysis of how it is compatible/harmonious with the original design as required by GUP and the <i>Secretary of the Interior's Standards for Rehabilitation Historic Buildings</i>. The glass addition could be considered a visual intrusion because the division of the glass into small units is a sharply different than the simple wall surfaces and rhythmic window placement of the original building. We recommend consideration of revising the size and pattern of the glass wall panes to echo the window pattern of the original building.</p> <p>We agree with the SOC analysis that the design, scale, and location of the new South Building meets applicable standards and is compatible with the cultural resources in the immediate setting.</p> <p>8. Old Bookstore should be protected in place during construction because of its proximity to new construction. We recommend identification of specific protection measures to be executed before and during construction.</p>
	Stanford	Please refer to Stanford's enclosed cover letter dated 8/20/2021 (Response to JRP Ltr - 1) for responses to items 1 – 8 in this section.
	P&T	Review Summary comment #1: The Old Bookstore and Old Store buildings were built in 1906 and 1910 respectively as freestanding but related structures in terms of their similar roles in providing student services. Research found that the buildings, although originally physically separated, were connected physically and functionally in 1929.
	JRP	The individual building histories and evaluations of each building adequately addresses the original peer review comment.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	P&T	Review Summary comment #2: The evaluation section has been updated to provide a separate evaluation of the Old Bookstore and the Old Store as individual buildings. An explanation that the Two- Story Addition and connector built in 2007 during Barnum Center project do not need to be evaluated as they are not age-eligible has also been included.
	JRP	The revisions adequately address the original peer review comment.
	P&T	Review Summary comment #3: Page & Turnbull has provided a separate evaluation of the Old Store for individual eligibility to the California Register, which concludes that the Old Store is not eligible.
	JRP	JRP notes that the DPR 523 form was revised and includes an evaluation for individual eligibility that concludes that the building is not eligible.
	P&T	Review Summary comment #4: Not applicable to Barnum Center DPR.
	JRP	See comment responses at the end of this table. The evaluation of the GSE building requires updating because it does not identify any justifiable period of significance. Without a period of significance, the character-defining features that convey significance cannot be identified, which also means that impacts analysis cannot be completed.
	P&T	Review Summary comment #5: Confirmed. A statement of professional qualifications has been added to the revised DPR Forms, and appears here: Page & Turnbull staff responsible for the Barnum Center DPRs include: Ruth Todd, FAIA, Principal-in-charge; Christina Dikas Associate Principal; and Josh Bevan, AICP Project Manager/Cultural Resources Planner and primary author; all of whom exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture or Architectural History.
	JRP	Qualifications statement additions noted.
	P&T	Review Summary comment #6: Not applicable to Barnum Center DPR.
	JRP	See comment response above (SOC 20) regarding acknowledgement that revised design of glass panels is more complementary to the historical resources.
	P&T	Review Summary comment #7: Not applicable to Barnum Center DPR.
	JRP	No further comment.
	P&T	Review Summary comment #8: Relates to proposed construction project, not applicable to DPR evaluation.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	JRP	The revised DPR form concludes that Old Bookstore is not eligible. While Stanford my wish to protect this asset, such treatments are not required for buildings that are not eligible for the CRHR.
SOC Attach. 2-4	21	It would be useful to prepare a DPR 523 Update that adds specificity to the character-defining features, as well as any features that are not character-defining. This info is used to inform impacts analysis and to support the SOC.
	Stanford	Green Library DPR was prepared by Santa Clara County Planning Office. There are no proposed alterations or construction activities that would trigger a re-evaluation of this building. The proposed alterations to the Graduate School of Education North Building are on the opposite side from Green Library and the proposed new South Building is compatible in design.
	JRP	Acknowledged that there are no proposed alterations to Green Library. The conclusions of the SOC could be strengthened by updating this previous evaluation; however, it is not required for compliance with the GUP.
SOC Attach. 3A-1	28	This 2004 recordation seems to have set the precedent for recording this building cluster as a single building. They are three different buildings with three development histories. The structures used to connect the buildings later are ancillary.
	Stanford	See Page and Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The Office of Historic Preservation’s attribute codes define “ancillary buildings” as “HP4. Ancillary Building: Barns, outhouses, detached garages, carriage houses, sheds, etc.” ² The original DPR form evaluation prepared by Page & Turnbull recorded the Barnum Center as one building as it is currently assigned one University Building code and has one assigned street address. The updated DPR forms provide a comprehensive history of both the Old Bookstore and Old Store and individual evaluations of each formerly freestanding building.
	JRP	Acknowledged that the updated DPR forms clarify the building histories and include individual evaluations of each building.
SOC Attach. 3B-1	41	Was this evaluation accepted by the county?
	Stanford	The County relied upon it for the CEQA findings and issued a building permit.
	JRP	Acknowledged.
SOC Attach. 3C-1	42	These buildings would be more appropriately considered as separate buildings, similar to how other early 20th-century commercial buildings with party walls are considered (although in the case of Barnum Center, the buildings are actually separated and do not share walls).
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	P&T	Each of the buildings that comprise the Barnum Center are physically and functionally adjoined and function as one University facility with one use, one University- assigned building number, and one street address. The Old Store and the Old Bookstore were physically and functionally linked in 1929 and do not share party walls like some side-by-side commercial buildings. Nonetheless, the evaluation has been updated to consider each individually, while providing a comprehensive context that provides a thorough construction chronology and site development history of each building.
	JRP	Acknowledged that the updated DPR forms clarify the building histories and include individual evaluations of each building.
SOC Attach. 3C-2	43	The light standard shown in this photo is not included in the description below of "Site Features." Has it been evaluated if it is historic era?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The light standard does not appear to be historic in age. It does not appear in a pre-1960 photograph included in the DPR forms, showing a southeastward view of the Old Bookstore. The light standards appear to have been put in place ca. 2004, as they appear in a 2004 aerial photograph of the subject buildings. Overall, the light standard is not a site-specific feature for the subject property.
	JRP	Acknowledged that the light standard is not of historic age and does not require inventory or evaluation as a potential historical resource.
SOC Attach. 3C-4	45	Are these truly adjoined? Or are there just stucco fences closing off the space between the two buildings?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Yes, the buildings are adjoined. The nature of the building's connection and functional relationship is explained in the site development history section in detail.
	JRP	Acknowledged.
SOC Attach. 3C-5	46	What is the source of the 1919 information?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	An additional footnote has been added to provide citation. This citation, was previously provided in the Site Development History section of the evaluation.

Section Page#	Pdf Page#, Responder	Peer Review Comments and Responses
	JRP	Noted.
SOC Attach. 3C-6	47	How was the "connection" accomplished? Is it a physical connection or a functional connection?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	See above. This comment is similar to 3C-4 45 and has been addressed.
	JRP	Noted.
SOC Attach. 3C-6	47	Are these original windows and a door on the east facade?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	No, these windows and door are replacements, similar design to those at 2007 section of the Barnum Center.
	JRP	Clarification noted.
SOC Attach. 3C-7	48	This two-story building is not an addition. It is a separate building that does not need to be evaluated. It should only be taken into consideration as part of the setting of the Old Bookstore and the Old Store.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The revised DPR form notes that this addition is not age-eligible and is therefore not evaluated.
	JRP	Noted that DPR form has been clarified that this building does not require evaluation at this time.
SOC Attach. 3C-7	48	The "modern connector" appears to be an enclosed breezeway. Did construction of the connection require any modification of openings on the east side of the Old Store? Or does the breezeway provide access to the OldStore through an existing opening?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Review of the plans included in the report indicates that the east façade of the Old Store was altered and does not retain any original openings.

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	JRP	Noted that east side of Old Store does not have any extant original openings.
SOC Attach. 3C-10	51	B3. should also list the original use of the Old Store.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The B Form has been updated accordingly.
	JRP	Noted.
SOC Attach. 3C-11	52	This table lists very few exterior modifications made after the 1930s. It also shows that the 2007 project included rehabilitation actions that met SOI Standards. The analysis of historic integrity of each of these buildings should be reconsidered to reflect all actions.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	An integrity analysis is only required if a building is found to be eligible, or if loss of integrity is the reason for a building no longer representing significance. The evaluated buildings do not appear to be eligible.
	JRP	Integrity assessments are required if the resource appears to meet any of the significance criteria, and often included to strengthen cases of ineligibility. The content of the table appears to be directly related to building an argument about historic integrity of the resources. It is understood that individual evaluations of Old Store and Old Bookstore may conclude that one or both is eligible. Page & Turnbull revised the DPR form to individually evaluate each building and concluded that both are not eligible. No further action required.
SOC Attach. 3C-12	53	The orientation of the buildings to the quad remained unchanged.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	No response.
SOC Attach. 3C-12	53	See previous comments regarding the separate histories of these buildings. Re-naming them "Barnum Center" does not make them a single building.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.

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	P&T	The revised DPR form includes historic context relating to the Old Store and the Old Bookstore before the two buildings were physically and functionally connected in 1929.
	JRP	Acknowledged that the updated DPR forms clarify the building histories of Old Store and Old Bookstore.
SOC Attach. 3C-19	60	Clarify that the subject building was the first permanent home of the Stanford Bookstore.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Clarification added to the sentence.
	JRP	Noted.
SOC Attach. 3C-27	68	I do not see a physical connection between the two buildings in the 1950 Sanborn - Figure 62. Consider an inset to provide a magnified or clarified detail.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The connection is illustrated on the 1950 Sanborn map. A red arrow has been added to the map graphic in question, and a zoomed in detail view has been added to help illustrate the feature. Unfortunately, Sanborn map scans are often grainy, so the images provided are the best available.
	JRP	Mark-up to graphic noted.
SOC Attach. 3C-28	69	This alteration was carried out using appropriate materials for the building and a complementary design.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Yes, the materials were appropriate and the design contemporary, but that does not in its own right correlate to significance.
	JRP	Comment was intended to contribute to an integrity analysis. No further action needed.
SOC Attach. 3C-32	73	It is not clear what "pre-existing connection" this refers to. The "cut opening for door" shown on these plans looks like it refers to making an opening in the fence between the buildings to allow for passage between the buildings. It is unclear whether the door openings that face one another between the buildings are original or not.

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	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	P&T reviewed available plans and has attempted to add clarity. "Pre- existing connection" refers to the original connection made between the buildings in 1929, which was later expanded.
	JRP	Clarification noted.
SOC Attach. 3C-40	81	His appointment as the first chair of the university's Art and Architecture Department should also be taken into account here. Also, while it is understood that the Lou Henry Hoover House was a team effort, it was ultimately his name on the design - it is a tough argument to make that the designer of a building that is later designated an NHL is not a master architect. Finally, Clark may take exception to the characterization that he was an educator first and an architect second. Even if he agreed, his appointment as first dept chair could be argued as recognition of his skills, thus meeting the definition of "master" architect.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Clark's role as a department chair was an academic position, which did not relate to his professional practice or body of work. An individual's hiring as the first department chair is not in its own right significant, as a person's productive life and contributions to history or a specific profession would be evaluated under Criterion 2, or through an architectural lens under Criterion 3. Clark's appointment as Department Chair also occurred before many of the residences and subject building were designed, and therefore, preceded the majority of his career as an architect. Understanding of the architect's career, is necessary to determine whether they meet the threshold of a "master architect," rather than simply considering whether the individual was appointed to a chair position.
	JRP	Noted that the evaluation in the DPR 523 form was revised to acknowledge that Clark meets the threshold of "master" architect.
SOC Attach. 3C-41	82	It is noteworthy that the wall parging that he applied after the earthquake has retained historic integrity to the present.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The retention of the stucco since 1906 reconstruction was accomplished in part through repair and patching undertaken in 2007. This is described in the evaluation. Nonetheless, retention of stucco over an extended period of time has been accomplished at many buildings, with the work done by many builders, which does not lend to this aspect of the architecture being noteworthy in our opinion. Research did not find evidence that Balsbaugh's parging technique was considered innovative or influential, despite its apparent high quality.

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	JRP	Noted that research did not find evidence that the parging technique was considered innovative or influential.
SOC Attach. 3C-41	82	Masters do not need to be nationally renowned or even formally trained. They can be significant within a local or statewide context.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Clark's biography has been updated to acknowledge that he does appear to have been a master architect within a local context. However, his principal works were residences, and the subject Old Bookstore does not appear to be individually significant as a representative work of Clark's.
	JRP	Noted that the evaluation in the DPR 523 form was revised to acknowledge that Clark meets the threshold of "master" architect.
SOC Attach. 3C-42	83	"Originally completed in early 1906, the Barnum Center originated as..." is not accurate. The Barnum Center as a concept did not exist until the 2000s. The Old Bookstore was constructed in 1906.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	See updated DPRs for revised evaluation section.
	JRP	Acknowledged that the updated DPR forms clarify the building histories of Old Store and Old Bookstore.
SOC Attach. 3C-42	83	These early buildings do speak to how the university was conceptualized. They show that the university valued design of more than just the grand academic buildings. They help demonstrate the desire for a coherent architectural aesthetic.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Many institutions seek to create architecturally cohesive campuses, valuing design and quality of construction as part of a broader plan. The Old Bookstore and Old Store were located close to the Quad and other buildings featuring masonry construction and tiled roofs akin to the blending of Richardsonian Romanesque precedents with the influence of California's missions. This aesthetic was incorporated into later buildings on campus as a means of harmonizing new and old architecture. Yet, the Old Bookstore and Old Store do not appear to be individually significant for their association historic patterns of campus development in the Bay Area region.

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	JRP	It is acknowledged that the revised evaluation concludes that Old Store and Old Bookstore do not individually meet the significance criteria; however, the evaluations should address their potential to be contributors to a larger historic district should one be identified. This is because historic-era buildings can contribute to districts even when not individually significant.
SOC Attach. 3C-42	83	Student service buildings have their own historic context that is separate from the grand academic buildings. The evaluation needs to establish if student support buildings are a significant historic context to the university(seems likely) and evaluate them within that context.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	The University’s 2017 Historic Resources Survey establishes the context for evaluating Stanford's buildings. The context statement does not identify any events indicating that these two buildings are significant. Furthermore, Page & Turnbull’s research did not identify any events that would otherwise be considered historically significant. Although the Old Bookstore was the first permanent bookstore on the campus, student services existed prior to the building’s construction. Additionally, the establishment and planning of a campus may require the provision of academic, athletic, and support or service buildings. At a major university with an expansive history, it is most objective to consider whether a building or buildings being studied are associated with significant events related to scholarship, scientific research/development/invention, or exceptional contributions to public service.
	JRP	Acknowledged that Stanford does not consider student support an historically significant context.
SOC Attach. 3C-43	84	1. Consider that if they are the earliest and most pure examples of Mission Revival style on the campus, they may have local architectural significance; 2. Consider whether they are rare surviving examples of their type.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	P&T reviewed available architectural context to address these questions and considerations. As described in the DPR forms, neither the Old Bookstore or Old Store appear to be individually eligible under architectural criterion 3.
	JRP	Acknowledged that the revised DPR 523 form individually evaluates each building and concludes that neither meets any of the significance criteria.
SOC Attach. 3C-43	84	While there are grander examples of Mission Revival architecture, these buildings strongly demonstrate their architectural identity and architectural significance does not require that a resource is high style. They have sufficient character-defining elements to convey the style to observers. The form of the buildings also speaks to their quasi-commercial use. The rectangular form is consistent with commercial blocks on Main Streets in the early 20th century.

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	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	P&T did not find that the buildings had sufficient character-defining elements of the Mission Revival style such that they would be individually eligible. Their commercial use does not in its own right distinguish these early twentieth century buildings from others.
	JRP	Acknowledged that the revised DPR 523 form individually evaluates each building and concludes that neither meets any of the significance criteria.
SOC Attach. 3C-44	85	See previous comment re Clark.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	See above re: Clark.
	JRP	See response above (SOC Attachment 3C-41).
SOC Attach. 3C-44	85	Did research reveal if his parging technique - which has withstood for over 100 years - was developed by him, or innovative?
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	No, research did not reveal that the parging technique was innovative. The stucco was repaired during the course of the 2007 Barnum Center project.
	JRP	Noted that research did not find evidence that the parging technique was considered innovative or influential.

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SOC Attach. 3C-44	85	To properly evaluate these buildings, they should be considered two separate buildings. The Old Bookstore and the Old Store are among the earliest extant buildings on the Stanford Campus. They were built adjacent to the Main Quad according to a rather pure rendition of Mission Revival architecture to house student support services. The scale of the architecture was smaller than the highly stylized Romanesque academic buildings, a reflection of the separate, but still important, function of the buildings, and also consistent with the aesthetic chosen for other non-academic buildings on and near the campus during this period. These buildings could be argued to meet Criterion 1 for importance within the context of early student services, and to meet Criterion 3 as locally important examples of Mission Revival architecture that ties into the Main Quad and is an important aspect of the setting of the Main Quad. The historic integrity of each of the two buildings should be thoroughly analyzed and should take into consideration that they could be considered rare surviving examples of their type. It appears as though the Old Bookstore has a higher level of integrity than the Old Store. The 2007 addition is a separate building and does not require evaluation.
	Stanford	See Page & Turnbull memo dated 8/13/2021 and revised DPR forms.
	P&T	Refer to response above regarding evaluation of the Old Store and Old Bookstore as individual buildings. Page & Turnbull did not find that the buildings' roles in providing student services were individually significant. Historic integrity is only analyzed when buildings appear to be eligible based on significance criteria. In this case, neither building was found eligible. Therefore, neither building has a period of significance or character-defining features that would inform an integrity analysis.
	JRP	It is acknowledged that the revised evaluation concludes that Old Store and Old Bookstore do not individually meet the significance criteria; however, the evaluations should address their potential to be contributors to a larger historic district should one be identified. This is because historic-era buildings can contribute to districts even when not individually significant.
SOC Attach. 4A-1	90	Are these scholars who have a connection to the building?
	Stanford	This is a DPR that has been finalized and accepted by the County. The evaluation identified significant scholars associated with educational research and assessed their association with the property. The prior evaluation found the property eligible under Criterion 3; expanded consideration of additional scholars is not required to support the CEQA finding for the current proposed project.

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	JRP	<p>This response applies to this comment and the remaining comments in this table that are all related to the School of Education evaluation: The identification documents for the historic School of Education North Building are inadequate. Because the project proposes a major alteration to the historic North Building, a thorough identification of its attributes, contributing elements, and character-defining features are required, but neither the original 2009 evaluation, nor the 2017 update, provide the necessary specificity and do not meet standard practice for evaluation. The 2009 evaluation identified a Period of Significance from 1938 – 2008 without justification of that lengthy period. This period of significance is not appropriate for a resource eligible for its architecture and in fact, could mean that all alterations and updates made to building up to 2008 could be considered character-defining. The 2017 update does not provide any justification for the period of significance it identifies it as 1900 – 1924, which is wholly inappropriate for a building constructed in 1938. These evaluations need to be updated with clarifications that properly define a period of significance, without which no character-defining features can be justifiably identified or defined. It is standard practice to conduct updates of previous cultural resources evaluations. The California Public Resources Code recognizes the importance of updating surveys that are greater than 5 years old before listing any properties in the CRHR. For a major project that will alter an historical resource, this principal should be applied here in order to identify a proper period of significance, as well as a complete list of character-defining features of the historic North Building and the level of its significance (i.e., local, state, or national). The updated evaluation must include identification of interior character-defining features, if any, explicitly describing any such features identified. Without this full identification of the aspects of significance and character-defining features, the project cannot be adequately assessed for impacts.</p>
SOC Attach. 4A-2	91	<p>1938 - 2008 is not an appropriate period of significance for a property that has architectural significance under Criterion 3 because this criterion recognizes the type, period, or method of construction at the time it was built. It would also mean that every change to the building during that period could be considered historically important. Also see comment on Period of Significance in the 2017 evaluation below.</p>
	Stanford	<p>This is a DPR that has been finalized and accepted by the County. The prior evaluation found the property eligible under Criterion 3; expanded consideration of other potential periods of significance is not required to support the CEQA finding for the current proposed project.</p>
	JRP	<p>See response to SOC Attachment 4A-1, pg 90, above.</p>
SOC Attach. 4A-2	91	<p>It is not clear how Lewis Terman would have any potential to be significantly associated with this building that was constructed in 1938. We suggest we removing this paragraph. We recommend replacing it with analysis of faculty who worked in the building in the first few decades after it opened.</p>

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	Stanford	This is a DPR that has been finalized and accepted by the County. The DPR identified prominent Stanford scholars in the field of educational research and assessed their association with the property. The prior evaluation found the property eligible under Criterion 3; expanded consideration of other criteria is not required.
	JRP	See response to SOC Attachment 4A-1, pg 90, above.
SOC Attach. 4B-1	97	Has the light standard that appears in this photograph been inventoried or evaluated if it dates to the historic era?
	Stanford	The proposed project has no potential to affect this light standard. However, the light fixture is modern and is a standard used throughout the central campus, installed approximately 25 years ago.
	JRP	Noted that the light standard does not date to the historic period.
SOC Attach. 4B-2	98	Need more specificity about the nature of the remodeling in order to develop an accurate list of character-defining features and to analyze potential project impacts. Expanded discussion should appear as part of the evaluation on the continuation sheets.
	Stanford	The Graduate School of Education “North Building” has no public interior spaces and thus no character-defining interior features. The North Building is a private educational facility. Its offices and classrooms are intended for the private use of Stanford students, faculty and staff. Public access to the North Building occurs only occasionally and is not an integral use for this property. There is no expectation of public access to private facilities and it is common and customary to exclude private interior spaces from historic resource review. The County of Santa Clara and Stanford agreed that a small number of specialized facilities on the campus have as an integral component of their use welcoming members of the public: theaters, museums and sporting venues, in particular.
	JRP	See response to SOC Attachment 4A-1 above.
SOC Attach. 4B-2	98	This is not an appropriate period of significance for a building constructed in 1938.
	Stanford	This is a DPR that has been finalized and accepted by the County. The prior evaluation found the property eligible under Criterion 3; expanded consideration of other potential periods of significance is not required to support the CEQA finding for the current proposed project.
	JRP	See response to SOC Attachment 4A-1, pg 90, above.

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SOC Attach. 4B-2	98	The previous evaluation notes that the interior has high integrity. The evaluation needs to address potential interior character-defining features (especially because the project proposes interior changes). Also, the "Classical elements" should be specified and recorded on the form. The identification of character-defining features should also consider other aspects of the site like setback, hardscape, and circulation patterns.
	Stanford	The interior elements are not character-defining features in either previous evaluation of the building (2009 or 2017). The County and Stanford agree that interiors of campus buildings whose program is public-facing may be character-defining (see list). "Private" interiors are not. The GSE Building contains classrooms, offices and a library that serve its private educational activities and are only incidentally open to the public.
	JRP	See response to SOC Attachment 4A-1 above.