



STANFORD UNIVERSITY
DEPARTMENT OF PROJECT MANAGEMENT
LAND, BUILDINGS AND REAL ESTATE

November 19, 2021

County of Santa Clara
Department of Planning and Development
70 West Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

Attention: Charu Ahluwalia, Associate Planner

Regarding: Stanford Graduate School of Education (GSE) Project
Architecture and Site Approval (ASA) and Grading Approval
County File Number PLN21-011

**Subject: Response to Incomplete Letter dated September 21, 2021
Response to Policy Issues Letter dated October 7, 2021**

Dear Ms. Ahluwalia:

This letter is issued in response to your Incomplete Letter dated 9/21/2021 (including JRP's memo and comments table dated 9/10/2021), and the Policy Issues letter dated 10/7/2021, regarding the subject above.

PLANNING

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).

Response: The DPR has been updated as requested. Please refer to enclosed update to the DPR for the Graduate School of Education Building, included in the “SOC Attachment - 3” document.

- 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.

Response: Resources that do not appear to be individually eligible may be eligible as contributors to previously identified or potential historic districts. Neither previous historic evaluations nor research for this evaluation of the Old Bookstore and Old Store identified any potential or formally designated historic districts to which the subject buildings contribute. The updated DPRs for the Graduate School of Education Building, Old Bookstore and Old Store (included in the “SOC Attachment - 3” document) provide details regarding prior district evaluations on campus to address this comment.

LAND DEVELOPMENT AND ENGINEERING

- 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.

Response: Item 5.a has been updated to check “YES”. Please refer to enclosed updated C.3 form, “Clean Water Questionnaire – 3”.
 - 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?

Response: Item 6, Site Design Measures, has been modified to add self-retaining areas. Some pervious areas are self-treating and some are self-retaining. All water that is collected in the storm drain system goes to the regional treatment areas. The Silva Cells are not considered as a treatment measure for this project, they are included in the design to provide soil for tree roots.

- 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.

Response: Item 6, LID Treatment, has been updated and “Other” has been selected. A reference to the East Campus Regional Facility has been added.

- 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.

Response: Item 7, STM Sizing Criteria, has been updated to “1b” for the East Campus Regional Facility.

- 4) Sheet C4.01 indicates that the pavement modifications east of the gap between the buildings is covered under the Lasuen/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 Lasuen/Escondido Circulation Project are consistent with Sheet C6.00.)

Response: Sheets are consistent with PLN20-036 work shown for asphalt sliver improvements for fire lane widening. Steven Reynolds from BKF Engineers called and reviewed the plans and responses with Ed Duazo from County LDE on 9/21/2021.

FIRE MARSHAL

- 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).

Response: Inconsistencies in the plans have been revised and corrected. Information provided on all plan sheets is now consistent. A fire hydrant is shown on sheet C7.01 and is located within 100 feet path of travel to the 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.

Response: Please refer to sheet C7.01, which shows the new building-mounted FDC with a normal operating pressure of 150 psi; also refer to the legend in the upper right-hand corner of this sheet.

JRP MEMORANDUM DATED SEPTEMBER 10, 2021

- 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.

Response: Please refer to the enclosed update to the DPR for Graduate School of Education Building, which addresses character-defining features and the period of significance.

- 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.

Response: Please refer to our response to Planning item #2 above.

- 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.

Response: Demolition and restoration plans are now included in the revised drawing set “Plans - 3”, sheets NA2.1 through NA2.4. Please note that this project involves a major renovation of the Graduate School of Education North Building, and some selective demolition is required to accomplish the proposed architectural, structural/seismic, MEP and code improvements.

- 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).

Response: Please refer to the response to item #5 below.

- 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.

Response: Please refer to revised drawings "Plans - 3", including sheets NA0.7, NA2.2, AA2.1, AA2.3 and NA3.3. A new sloped clay tile roof is now included in the project scope, which forms a backdrop to the glazed curtain wall and restores the roof ridgeline. Please refer to SOC-3, Standard #3. Also refer to the SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project (items #2 and #3).

These design revisions were discussed with County Planning and JRP in the pre-submittal meeting on 11/12/2021.

- 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.

Response: The shade structure/trellis is a free-standing landscape structure and is not physically attached to the building, but it is a fundamental element of the program. Its presence will enable full use of both the interior Forum and exterior courtyard spaces by providing much-needed shade and reducing heat gain through the south-facing curtain wall glass. Please refer to SOC-3, Standard #3. Also refer to the SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project, item #4.

This issue was reviewed with County Planning and JRP in the pre-submittal meeting on 11/12/2021.

- 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.

Response: Acknowledged; this issue is resolved.

- 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.

Response: Please refer to enclosed update to the DPR for the existing Graduate School of Education Building, which clarifies the character-defining features and indicates that the courtyard and the secondary façade are not significant features; therefore, it meets the standards. Also refer to SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project, item #5.

- 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.

Response: Please refer to revised drawing sheets AA2.0, AA2.1 and SA3.1. The contrasting paint colors have been removed. It is noted that JRP found the originally submitted design of the South Building to be compatible per their memo dated 2/26/2021, item #7. Please refer to SOC-3, Standard #9. Also refer to SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project, item #6.

- 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 Lasuen Mall.

Response: Please note that in their memo dated 2/26/2021, item #7, JRP found the original South Building design to be compatible; hence, the design of the west façade has reverted back to the monochromatic color scheme and has also modified the window mullion patterns. Please refer to SOC-3, Standard #9. Also refer to the SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project, item #6 and additional information pages.

This design revision was reviewed with County Planning and JRP in the pre-submittal meeting on 11/12/2021.

COUNTY PLANNING - POLICY ISSUES LETTER DATED OCTOBER 7, 2021

The information provided below are not incomplete items. The items below are for the Applicant's information only and can be discussed further if desired with County Staff.

The GSE project includes interior renovations and addition of a glass and metal curtain wall at the south wall of the North Building (identified as a significant historic resource determined potentially eligible for listing), demolition of two of three building of the Barnum Hub, and construction of a new four-story South Building directly across from the North Building and adjacent to Old Bookstore building (which is part of the Barnum Hub).

School of Education North Building: After reviewing the re-submittal for the proposed project, JRP has concluded that the School of Education North Building as currently designed, would diminish the historic integrity of the building to a degree such that it would no longer be eligible for listing in the California Register of Historical Resources (CRHR) listing, which in turn would constitute a significant impact to the historic resource. Per JRP peer-review, the proposed design 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. Further, 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. Please note comments 4, 5 and 6 of JRP's peer-review memorandum, attached.

Staff concurs with the analysis and conclusion of JRP's peer-review and recommends modifying the project design based on design recommendations provided by JRP in comments 5 and 6.

School of Education South Building: Regarding the design of the South Building, for compatibility with nearby historic buildings and to better anchor the proposed new structure to Lasuen Mall, JRP recommends the west façade of the South Building display more architectural elaboration, and finds the introduction of contrasting paint colors to the west facade not compatible with the monochromatic buff exterior color scheme of the adjacent historic buildings. Please note comments 9 and 10 of JRP's peer-review memorandum, attached.

Staff would also like to call attention to one aspect of the South Building that concerns design compatibility with the character of the immediate neighborhood, that is the west elevation design. Below are excerpts of the County's required findings for ASA, the associated Guidelines established for reviewing said projects, whereby Staff is having difficulty supporting the design of the South Building:

ASA Finding B (Section 5.40.040 of the Zoning Ordinance):

Appearance of proposed site development and structures, including signs will not be detrimental to the character of the surrounding neighborhood or zoning district;

Guideline for Architecture and Site Approval, Chapter 1- Design, Section A - Architecture, Compatibility with Neighbors:

Structures should relate in size and general appearance to adjacent buildings and to the neighborhood in which they are located. No structures will be approved which is aesthetically incompatible with the best neighboring structures. Site design, arch architecture and landscaping; use of similar roofing, wall material and complementary colors are means by which a proposed project can be made compatible with its neighbors.

The proposed South Building is not only located adjacent to the historically significant School of Education North Building, but is also in the precinct of existing buildings along Lasuen Mall, including but not limited to the Green Library and Main Quad, that provide a district visual character to the street where the proposed South Building would be located.

Staff appreciates that Stanford has provided some changes to design of the west façade in the September re-submittal in response to issues of concern stated in the February 25, 2021 letter, however, Staff continues to have concerns regarding design compatibility of the South Building with the character of the immediate "neighborhood".

The re-submittal design includes a contrasting color panel between the second and third floor windows on the South Building west facade, which is not compatible with the monochromatic buff exterior color

scheme of the adjacent historic buildings or the Lasuen Mall street character. The window design does not complement size and proportion of the North Building's west façade fenestration or the Old Bookstore building, which would front this new South Building when viewed from Lasuen Mall. The monolithic façade articulation on the South Building west elevation also does not blend with the visual character of Lasuen Mall frontage, which includes both historically significant and new buildings with a variety of window openings and types, façade articulation, and other common and noticeable architectural elements. The existing newer buildings along Lasuen Mall display window openings grouped and proportioned to blend with neighboring historic buildings.

It is staff's determination that due to incompatible contrasting color panels, lack of façade articulation, and unresponsive window design of the South Building west elevation, the proposed design would not be aesthetically compatible with the Lasuen Mall street character. The monolithic west façade design coupled with the 10 feet higher elevation compared to the North Building, further enhances the incompatibility to the character of Lasuen Mall.

Staff is of the opinion that design refinements could make the South Building "aesthetically compatible" with the Lasuen Mall street character, by incorporating the following recommendation:

- Redesign west elevation window openings/window types and introduce façade articulation complimentary to the North Building west façade, and Lasuen Mall Street character.

As currently designed, Staff may not be able to support the project without further design modifications.

Response: Please refer to the response to JRP comment #10 above. Please also refer to SOC-3, Standard #9. Also refer to the SOC Attachment - 3, Appendix to Statement of Compatibility for Graduate School of Education Building Project, item #6 and additional information pages. This design revision was reviewed with County Planning and JRP in the pre-submittal meeting on 11/12/2021.

We appreciate your assistance. Please contact me at (650) 996-6754 if you have any questions.

Respectfully submitted,

STANFORD UNIVERSITY
Department of Project Management



Michael Mithen
Project Manager

cc: file 5363

enclosures:
Clean Water Questionnaire - 3
Plans - 3
Response to JRP Table – 2 (Word and PDF formats)
SOC - 3
SOC Attachment - 3