

January 4, 2005

Michael Rhoades  
Department of Planning, Building and Code Enforcement  
801 N. First Street, Room 400  
San Jose, CA 95110-1795

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the KB Home Monte Vista Residential Planned Development Zoning Project (File No. 03-071)

Dear Mr. Rhoades:

At the December 1, 2004 Historic Landmarks Commission meeting, the Commission discussed the Draft Environmental Impact Report for the KB Home Monte Vista Residential Planned Development Zoning Project. In a 7-0-0 decision, the Commission voted to forward this comment letter, signed by the Chair, to the Director of Planning, Building and Code Enforcement and to the Planning Commission. It is the consensus of the Historic Landmarks Commission that the Del Monte Plant #3 is of such substantive historic significance to the City of San Jose, that adaptive use of the identified, significant portions of the site should be paramount to any development proposal for the site.

*Historic Significance:*

As early as 1998 the Del Monte Plant #3 was found eligible for listing as a contributor to a discontinuous National Register Historic District. Del Monte Plant #3 warehouses 2, 3, 4, and 20 were found individually eligible as a City Landmark, for the California Register of Historic Resources and the National Register of Historic Places as a part of the DEIR process. The historic portion of the complex is significant for its association with the fruit processing and canning industry as the longest running cannery in San Jose (page 6, Appendix H). This same portion of the complex is also significant for its architecture as a well-preserved example of a Santa Clara Valley cannery built during the first half of the twentieth century (page 7, Appendix H).

The Commission stated that the historic portion of the Plant #3 complex is an extremely important link to San Jose's fruit processing and cannery history. The cultural and architectural significance of the complex speaks to the Valley's history, and adaptive use of the significant portions of the complex should be the starting point for any redevelopment of the site. One need only look to the success of the Mariani Square project at Jackson and 12<sup>th</sup> for an example of successful reuse. The Commissioners also recognized that San Jose has little Streamlined Moderne architecture and that this complex is a rare example of that type. As stated in the Historic Resource Evaluation & Re-Use Study, Appendix H of the DEIR, Del Monte Plant #3 is one of only four remaining contributors to a National Register-eligible district on three sites and is one of the most significant surviving canneries in the Valley (page 7, Appendix H).

The Commission drew attention to the Project Objectives on Page 9 of the DEIR, and, in particular, the City's objectives which call for consistency with the San Jose 2020 General Plan and furthering of the General Plan goals and strategies. Preservation of the City's historic resources is a common theme among these goals and strategies.

*San Jose City Policies:*

The Landmarks Commission indicated the City policies that promote the preservation of historic resources and are referenced in the DEIR. The San Jose 2020 General Plan, Urban Conservation/Preservation Major Strategy addresses the preservation of historic resources as a strategy due to the "inestimable character and interest" such resources lend to the City's image. Historic, Archeological and Cultural Resources Goals and Policies of the General Plan call for preservation as a key consideration in the development review process. The Discretionary Alternate Use Policy of the General Plan provides flexibility for sites with historic resources and is intended to enable preservation of the City's historic buildings. The City Council Policy on the Preservation of Historic Landmarks requires early public notice of projects that could harm a historic resource and strongly encourages the preservation and adaptive reuse of such resources. The proposed project is contrary to these City policies.

*Mitigation Measures*

The Commission stated that the mitigation measures are insufficient given the significance of the site.

It was suggested that the conveyor belt across Auzerais Avenue be retained as it is a well-recognized icon of the site and the canning industry in San Jose. The conveyor belt could be included with or as a public art component for the site.

*Feasible Alternatives*

The Landmarks Commission commended the quality of the Historic Resource Evaluation and Re-use Study, attached as Appendix H to the DEIR. There appear to be several feasible alternatives that retain significant portions of the complex while providing for substantial new construction. Commissioners noted that several of the alternatives (B, D, E) call for the inclusion of a high-rise structure. Commissioners felt that high-rise development at this location, given nearby development and the adjacency to the Vasona Corridor Light Rail Transit (LRT) line, scheduled to open in January 2006, and the future San Carlos Street LRT station, was an excellent solution. (High-rise as defined by this document to be 90 feet in height. In most urban environments the proposed structure would be considered a mid-rise).

Commissioners questioned whether information regarding the economic feasibility of the proposal would be forthcoming given the project proposal to demolish the complex. Commissioners stated that the project should be evaluated using all available economic incentives for historic preservation including the transfer of development rights and the various tax credit programs. It was observed that the DEIR Summary of Alternatives, page xv, states that if the current project is not approved, it is likely another project with similar impacts would be proposed. The Commission felt that it is entirely possible that

an application may come forward to reuse the historic portion of the complex and take advantage of the historic nature of the site and the available incentives.

Commissioners suggested that the development of the adjacent park incorporate information, equipment, and structures from the historic complex. Examples from other cities of such parks, include Seattle's Gasworks Park as well as parks in New York City.

*Conclusion*

The Landmarks Commission strongly opposes the demolition of Del Monte Plant #3 due to its significance and the potential feasibility of reusing the significant portions of the complex while adding substantial new construction.

Thank you for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Polcyn", followed by a period.

Stephen Polcyn, Chair  
San Jose Historic Landmarks Commission

C: San Jose Historic Landmarks Commission