



PRESERVATION ACTION
COUNCIL OF SAN JOSE

42A South First Street
San Jose, CA 95113

Phone: 408-998-8105

www.preservation.org

March 3, 2025

Stacy White
San José State University
Facilities Development and Operations
1 Washington Square, Corporation Yard A
San José CA 95192
VIA EMAIL (campusmasterplan@sjsu.edu)

**RE: SAN JOSE STATE UNIVERSITY CAMPUS MASTERPLAN DRAFT
ENVIRONMENTAL IMPACT REPORT (EIR) COMMENTS**

Dear Ms. White,

The Preservation Action Council of San Jose (PAC*SJ) appreciates the opportunity to comment on the Draft EIR for the San Jose State University Campus Master Plan. We understand that the Campus Master Plan is a long-range planning document that guides the development and use of campus lands to accommodate projected growth in student enrollment and increase in demand for academic facilities, additional housing, recreation and athletic facilities, and student support facilities and services on campus through 2045. The focus of our comments concerns the University's decision-making process around historic resource impacts on the 88.5 gross-acre downtown Main Campus, from the proposed demolition of at least 650,000 assigned square feet of existing and potentially historic academic, administrative, and support facilities as part of the anticipated development.

PAC*SJ BOARD

President &
Advocacy Chair
Mike Sodergren

VP Fundraising
Patt Curia

Secretary
Lynne Stephenson

Treasurer
John Frolli

Continuity Editor
Gayle Frank

Scott Brown

Carl Foisy

**Clare Gordon
Bettencourt**

Jen Hembree

André Luthard

Gratia Rankin

Nancy Reynolds

Sally Zarnowitz

PAC*SJ STAFF

Executive Director
Ben Leech

Office Associate
Jennifer Roman

Outreach Associate
Matthew Massey

3.4 Cultural Resources

The document explains that the Cultural Resources Section should evaluate and analyze “the potential impacts of the Campus Master Plan on known and unknown cultural resources.” However, the records search, identifying listed or previously surveyed buildings, is not sufficient to evaluate the historic significance of buildings proposed for demolition. Without understanding whether the buildings proposed to be demolished appear eligible for listing in the California Register of Historical Resources, as determined by a qualified historical consultant, potential impacts, and mitigation measures and alternatives to lessen those impacts, cannot be analyzed.

The extent of the buildings proposed for demolition is not clearly disclosed in the Draft EIR. Figure 2-8 does not clearly illustrate existing buildings to be demolished, focusing instead on existing buildings to remain and new buildings to be constructed. Table 3.4-2 lists existing buildings on campus constructed by 1980, but does not clarify which of these the Campus Master Plan proposes to demolish (and at least one mid-century building, Science Building 048, is missing from this table). Separate from the Draft EIR, Chapter 7 of the SJSU Final Campus Master Plan lists buildings proposed to be demolished (p. 7-9), but does not list their ages. Referencing the Master Plan document and adding Science Building 048 to Table 3.4-2 Existing Buildings on Campus Constructed by 1980, we ascertain that at least thirteen of the buildings from that table appear to be proposed for demolition. Several architecturally distinctive mid-century buildings are included in the list, including but not limited to the Music Building 044 (Stanton Willard, 1952), Science Building 048 (Edwin Shomate architect, 1955), Administration Building 030 (Alfred Eichler architect, 1957), and the Instructional Resource Building 033 (1962). Modern buildings require professional evaluations to understand their significance in the architectural and cultural context with which they are associated. This is exactly the kind of information and analysis that the California Environmental Quality Act (CEQA) requires to be included in a historic resource survey in order for decision-makers and the general public to fairly

weigh the impacts of and alternatives to a proposed project. As requested at the February 5, 2025 public comment meeting, historic resource evaluations, with California Department of Parks and Recreation DPR 523 forms for each building proposed for demolition that will be at least fifty years old during the project implementation, should be completed. In addition, the source(s) of the Eligibility Determinations listed in Table 3.4-2 should be cited, dated and provided in an appendix to the Cultural Resources chapter of the DEIR.

Envision San José 2040 Cultural Resource Policies

The Envision San Jose 2040 General Plan acknowledges the importance of historic resources in the Land Use and Transportation chapter: “The preservation of appropriate remnants of a city’s past provides multiple benefits important to the health and progress of the city. Historical resources: Are instructive, telling the story of a community’s past; Provide a sense of civic identity and unique character....”

Numerous General Plan policies have been adopted for the purpose of reducing or avoiding impacts related to cultural resources. The project would conflict with many of these, not even evaluating the buildings proposed for demolition to identify any historic resources. These policies encourage preservation incentives to encourage reuse of historic buildings giving meaning and architectural interest to places throughout the State, including use of the California Historical Building Code, which allows for alternatives to the regular code, offering cost effective and reasonable rehabilitation outcomes.

Mitigation Measures

Mitigation Measures 3.4-1a and 3.4-1b appear to be verification measures, providing for deferred determinations of whether buildings qualify as historical resources. CEQA Guideline 15064.5 provides

that determining whether a site impacted by a project is an historical resource is mandatory and must be made before the EIR is certified. The post-certification verification contradicts this Guideline, and allows for environmental decisions to be made outside a setting where the public is informed of decisions made by public officials. Mitigation Measure 3.4-1c appears to imply a possible scenario where the demolition of an historic resource could be fully mitigated by documentation alone. CEQA guidelines and case precedent are clear that documentation alone is never sufficient to justify a determination of no adverse impact, and this should be clarified in the discussion of mitigation measures and preservation alternatives.

3.5 Energy

In addition, we have long maintained that existing buildings are the greenest buildings, and California has now recognized this in the California Green Building Standards Code (CALGreen). Because buildings are a significant source of greenhouse gas pollution, with about 40% of annual global CO₂ emissions via building operations (27%) and embodied carbon (13%); effective July 1, 2024, CALGreen, Part 11, Title 24, limits embodied carbon emissions in the “construction, remodel, or adaptive reuse of commercial buildings larger than 100,000 square feet and school projects over 50,000 square feet.” These projects will need to comply through one of three pathways: Building Reuse of at least 45% of an existing structure; Performance measures; or Prescriptive measures. This section of the Draft EIR should be revised to acknowledge this standard as it affects the proposed plans.

Alternatives

As required by CEQA, the Draft EIR includes discussions of project alternatives that would reduce or eliminate adverse impacts to environment, including cultural resources. However, Preservation Alternative 3 (“Reduced Development and Historic Preservation Alternative”) fails to identify which specific buildings would be retained or replaced, rendering this analysis virtually meaningless.



PRESERVATION ACTION
COUNCIL OF SAN JOSE

42A South First Street
San Jose, CA 95113

Phone: 408-998-8105

www.preservation.org

Furthermore, the Draft EIR does not justify why this alternative includes an arbitrary 6-story height limit on new infill construction, significantly reducing the amount of new campus space without any corresponding benefit to the retention of historic resources. These two preservation alternatives (“Reduced Development” and “Historic Preservation” should be decoupled and analyzed separately, with a clear delineation of the historic resources proposed for retention in the later analysis.

Conclusion

In conclusion, PAC* SJ contends that the failure to include relevant information precludes informed decisionmaking and public participation, thwarting the statutory goals of the EIR process. We believe that only thorough historic resource evaluations can remedy the situation, and making clear the significance of buildings proposed to be demolished, the impacts from demolishing significant buildings, the mitigations to lessen those impacts, and the feasibility of alternatives to avoid those impacts. The Draft EIR should not be certified until the necessary information and analysis have been provided.

Sincerely,

Ben Leech
Executive Director
Preservation Action Council of San Jose

Cc: State Historic Preservation Officer