



**PRESERVATION ACTION
COUNCIL OF SAN JOSE**

History Park
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May 25, 2021

TRANSMITTED VIA EMAIL: City.Clerk@sanjoseca.gov

Mayor, Vice Mayor and City Council
200 E. Santa Clara Street
San Jose, CA 95113

**RE: May 25, 2021 City Council Agenda Item 10.3 GP20-007 & C20-002
Comments on DRAFT Amended Diridon Station Area Plan (DSAP)**

Dear Mr. Mayor, Vice-Mayor & City Council

Thank you for the opportunity to provide comments to you on the Draft Amended DSAP on behalf of PAC* SJ and its members. These comments are in addition to any comments the City has received via other forums.

In short, PAC* SJ is concerned about both what is absent from the amended draft of the DSAP, including but not limited to the following matters:

- 1) The amended DSAP Plan lacks reference as to how the historic Diridon Station itself “fits” within its namesake plan. It is the most iconic, prominent, unique feature to San Jose and yet, there is no statement of support for its existence going forward. San Jose’s failure to protect this structure sends a clear message to others who are currently or will be involved in private and multi-agency initiatives that San Jose is abdicating its voice in this matter; and,
- 2) Similar to our concern about the historic Diridon Station, the amended DSAP fails to establish a clear position of support for the protection and preservation of other historic buildings inside and outside the DSAP’s boundary that are either subject to direct demolition, or related negative impact from development within the DSAP; and,

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- 3) The absence of an updated DSAP EIR leaves developers and participants in multi-agency projects without up-to-date information that would otherwise inform the analysis of alternatives required by CEQA and the development of sensible mitigation measures. We disagree with the broad conclusions of the October 23, 2020 Circlepoint memo that there were no Substantial Changes to the DSAP Project, its Circumstances and Information Known. Relying on an EIR that was finalized in 2014, based on input from the community on a project that envisioned Major League Baseball stadium at its core appears to be an attempt to bypass San Jose’s responsibility to the people to properly analyze everything that will happen within this 262-acre planning area; and,
- 4) The review of Project Plans and EIRs for projects that will be located fully within the DSAP such as the Downtown West project is already proceeding in advance of finalizing the Diridon Station Area Plan and is being done so with a thin draft document that shows no recognition towards historic assets the City of San Jose should be protecting.

Mitigation Alternatives Analysis

PAC* SJ sees little to no connection between the mitigation measures listed in the Integrated Final Program EIR from August of 2014 and the amended DSAP. There is no apparent connection between the “alternatives” described in the 2014 DSAP EIR and the amended DSAP.

PAC* SJ is seeking to understand why the City is not reconciling the mitigation and alternatives analysis it did in 2014 relative to historic resources within a DSAP that envisioned Major League Baseball stadium with the current DSAP. We are quite simply looking for data we can use to weigh in on a DSAP that we believe should point to a robust mitigation strategy and alternatives analysis that is commensurate with the significance of the area slated for development.

PAC* SJ has noted in every community forum for which it has been invited the need for San Jose, as the Lead Agency for the DSAP, to take a position on the preservation of historic resources including but not limited to the following:

- **Preservation of the Diridon Station/Cahill Station Historic District.** Ideally, this will include all elements of this project (depot, outbuildings, platforms, signs, etc.). Should any entity seek to modify, move or demolish any of these historic elements, PAC* SJ is seeking the City’s commitment to exercising an active role when working with public agencies such as the Peninsula Corridor Joint Powers Board, High Speed Rail Authority, BART, ACE Train, VTA, etc. or any other private entity in aggressively representing the interests of the people of San Jose in preserving and protecting this National Register-listed historic landmark district.

The only document covering mitigation of the Diridon Train Station and its various elements is the



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2014 Final DSAP Program EIR, which notes in Section 2.2.1 (Additions and Modifications to the Station) that the historic depot building will remain for passenger rail functions and that existing heavy rail platforms, LRT facilities, and pedestrian tunnel would also remain in their current locations and that new platforms for the HSR trains would be constructed approximately 60 feet above the existing at-grade platforms.” PAC* SJ is painfully aware that the fairly detailed information that is included within the 2014 EIR regarding the disposition of the historic elements is almost completely absent and/or inconsistent with the limited information included within the amended DSAP document (e.g. there is zero language within the amended DSAP about saving the historic Diridon Station and resource and rail platforms at 25’ versus 60’ above grade). As such, there is woefully insufficient information to even discuss mitigation measures and alternatives. For this and other reasons, PAC* SJ is asking the City to note specifically within the DSAP that projects within the DSAP area (e.g. Downtown West, DISC, etc.) must comply with CEQA and other ordinances relative to preservation.

- Preservation, relocation, and rehabilitation of impacted historic resources and Structures of Merit, including receiver site property acquisition.
- Proactive planning efforts and historic resource surveys in the surrounding Diridon Station Area, which will undoubtedly be subject to increased development pressure as a direct result of the Downtown West project.
- Required documentation of all impacted CEQA-eligible historic resources and Structures of Merit should include both interior and exterior documentation. Industrial resources should be documented to the standards of the Historic American Engineering Record.

Thank you for the opportunity to provide these comments. We look forward to what we hope is a recognition by the City of the need to include the preservation of historic buildings and places such the Diridon Station/Cahill Station Historic District into all plans to be carried out by other organizations, business and agencies engaged in projects within the DSAP and its immediate vicinity.

Sincerely,

J. Michael Sodergren
Board Vice President & Advocacy Committee Chair
Preservation Action Council of San Jose (PAC* SJ)