

February 27, 2017

California State Parks
Office of Historic Preservation
Julie Polanco,
State Historic Preservation Officer
1725 23rd Street, Suite 100
Sacramento, CA 95816

**RE: California Register of Historical Resources Nomination of the Willow Glen
Trestle over Los Gatos Creek**

Dear Ms. Polanco,

The City of San Jose (“City”) is opposed to the nomination by Friends of Willow Glen Trestle to list the Willow Glen Trestle over Los Gatos Creek (hereinafter “the trestle”) on the California Register of Historical Resources for the reasons set forth below.

The trestle is located on the former Western Pacific Railroad alignment, approximately one quarter mile north of the intersection of Coe Avenue and Leona Court in San Jose, California. The City objects to the listing of the trestle as an owner of the property and the local government with jurisdiction over it.

1) The State Register has typically listed trestles and other types of bridges based on Criterion 1 and 3. To list a railroad trestle under Criterion 1 alone would be precedent-setting because this trestle does not meet the significance for Criterion 3.

2) The Willow Glen Trestle also does not meet Criterion 1 because it is not associated with events that have made a significant contribution to the broad patterns of local history, or the cultural heritage of California or the United States.

Prior to the current application, the City invested considerable time and resources in evaluating the trestle and whether it was a historic resource under local, state and national criteria. (See attached letter to the California State Parks Office of Historic Preservation dated March 24, 2016 pages 3-5.) The City petitioned the Keeper of the Register to decline nomination of the trestle for listing on the National Register of Historic Places. (See attached letter to the Keeper of the Register dated June 9, 2016.) The United States Department of the Interior National Park Service agreed and returned the nomination citing strong reservations as to significance of the trestle and questioned the applicant’s evaluation under the National Register eligibility. (See attached Return Comments dated July 5, 2016 by Paul R. Lusignan, Historian for Keeper of the National Register.)



1. Eligibility Criteria for the California Historic Register:

The City retained the advice and expertise of Stephen Mikesell, a noted expert in historical evaluation of bridges and trestles (see attached the curriculum vitae of Mr. Mikesell). His analysis in the December 2015 report of whether the trestle should qualify for National Register was carefully considered by the Keeper of the Register in response letter, dated July 5, 2016. Similarly, the trestle also does not meet the significance criterion for nomination under California Register Criterion 1. (See Mr. Mikesell's letter, dated February 14, 2017.)

California Register Criterion 1 requires that the subject property be: *Associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.*

The nomination asserts significance under "association with events", for the development of industry in West San Jose, emphasizing the fruit canning industry, and for the impact of the trestle on the residential development of the community of Willow Glen.

The trestle is not associated with the Commercial and Industrial Development of West San Jose in any important way.

The nomination application states that the Western Pacific Railroad was a dominant player in the economic development of San Jose and the local canning industry, when in fact the industry was well established before arrival of the line and the line itself was never more than a minor carrier of local tonnage. The trestle was only tangentially associated with the Santa Clara County fruit packing industry. The Western Pacific Railroad's role in the Santa Clara County fruit packing industry was dwarfed by that of the Southern Pacific Railroad.

The nomination application also argues that the Western Pacific in the 1922 broke the monopoly that Southern Pacific (and its many affiliates) held in Santa Clara County. It further notes that the Western Pacific adopted a Less-Than-Carload policy (allowing a packer to send a railroad car that was less than full) to serve smaller canners. During the period from 1922 to 1930 Southern Pacific shipped 10-20 times more dried fruit than the Western Pacific line. The association of the trestle with the fruit packing industry, and thereby commercial and industrial development in West San Jose is so secondary that it does not meet the State Register Criterion 1 guidelines. The nomination therefore fails to support their assertion that the trestle affected the commercial and industrial development of San Jose in any important way.

There is little support for any assertion that the trestle helped to shape residential building in Willow Glen.

The nomination states that the trestle helped to shape the development of Willow Glen, however, the incorporation of Willow Glen was precipitated by the proposed realignment of the Southern Pacific Railroad's 4th Street track, not the building of the Western Pacific line or the trestle. The association of the 1922 timber trestle with the Willow Glen community's 1927-1936 period of self-government is distant at best.

The application also asserts that there is a potential association with the life of T.S. Montgomery, however, there is no support for how Montgomery's work as a real estate agent, was connected with the development of the trestle or with residential development in Willow Glen.

2. Other Considerations

The City also noticed some inaccuracies in the Nomination Application.

- ***Continuation Sheet 13 of 37***

The applicant noted that there are only three timber trestles in Santa Clara County. In 2015, Jean Dresden, a community member and historic preservation enthusiast, stated that the trestle was rare because there were only eight remaining trestles in the County as listed below.

1. The Los Gatos Creek trestle.
2. Coyote Creek near Story Road.
3. Silver Creek near Eggo and Highway 101.
4. Guadalupe River south of Alma.
5. Los Gatos Creek south of Diridon.
6. Trestle through Don Edwards Wildlife Reserve.
7. Over Pajaro River near Highway 25.
8. At San Benito County line.

The California Register nomination lists numbers 1, 2, and 7, on this list while noting that number 3 was destroyed by fire in 2016.

It is impossible at this point to say whether the true number of extant trestles is three or seven or more. There is no consolidated inventory of railroad bridges available to the public as there is for public highway bridges. In addition, railroad bridges are, in many cases, not visible from public rights of way and may be seen only by trespassing on railroad property. Given the large number of railroad lines in Santa Clara County and the fact that timber trestles were built by the thousands nationwide, it is likely that the true number is larger than seven. It is misleading to say that there are exactly three extant timber trestles in the county.

- ***Continuation Sheet 21***

The top paragraph mentions the fact that the Western Pacific San Jose line was near the 1953 Ford Plant in Milpitas. This fact does not support either Criterion 1 or 3 because the traffic carrying Ford products to any area other than Willow Glen would not have used the trestle.

- ***Continuation Sheet 21-22***

There is no evidence that the trestle is a significant and rare example of its property type. In either case, this information is not relevant because the current application is seeking listing based solely on Criterion 1, and not Criterion 3.

Conclusion

Thank you for your consideration of the City's objection to the proposed nomination.

The City asks the State Historic Resources Commission not list the trestle based on Criterion 1, because it does not rise to the level of historic significance required for listing.

Sincerely,



Norberto Dueñas
City Manager
City of San José

Attachment A: Letter to SHPO, dated March 24, 2016, and appended
Photos of Trestle 2014

Attachment B: Letter to Keeper, dated June 9, 2016

Attachment C: Letter from Keeper Dept. of Interior, dated July 5, 2016

Attachment D: Stephen Mikesell Resume

Attachment E: Historical Evaluation of the Los Gatos Creek Trestle, San Jose, California,
dated December 29, 2015, by Stephen Mikesell

Attachment F: Letter from Stephen Mikesell, dated February 14, 2017