



Office of the City Manager

March 24, 2016

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

Dear Ms. Polanco:

I write in response to your letter dated February 12, 2016, in which you provide the City of San José with an opportunity to review and provide comment on whether or not the "Willow Glen Trestle" (trestle) meets the criteria for the National Register of Historic Places.

The City of San José opposes this nomination and asks that the State Historic Resources Commission not approve the nomination. As a Certified Local Government, the City of San Jose is committed to preserving historic properties and structures. The City has carefully considered whether the trestle meets the criteria for the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), and has twice concluded that it does not qualify as a local Historic Landmark.

National Register Analysis

The pending nomination asserts that the trestle is significant on the local level under NRHP Criterion A. The City engaged Stephen Mikesell, an Architectural Historian specializing in bridges and trestles, to prepare a historical evaluation report containing the historic context for the trestle and analysis for potential historic significance under the NRHP, CRHR and the City of San Jose City Landmark criteria. The analysis and City's findings related to the trestle's qualification for the NRHP under Criterion A follows. Because the pending nomination does not assert that the trestle is significant under Criteria B, C or D, the analysis for these criteria is not summarized in this letter, but is included in the attached historical evaluation report.

Trestle's significance under Criterion A, associated with events that have made a significant contribution to the broad patterns of our history

The trestle was thoroughly evaluated for inclusion in the NRHP under Criterion A in several different contexts: the history of the Willow Glen neighborhood, the history of the Western Pacific Railroad, the history of the fruit packing industry in San Jose, and the history of the grade separation movement. After a lengthy process involving extensive review and public discourse, the City disagrees with the assertion that the trestle has achieved any significance on the local level.



The City finds that the trestle is not associated with the history of the City of Willow Glen in any important way. The incorporation of Willow Glen was precipitated by the proposed realignment of the Southern Pacific Railroad's 4th Street track, and not the building of the Western Pacific line. The association of this 1922 timber trestle with the community's 1927-1936 period of self-government is distant at best. City staff and the City Council have the best understanding of how and why San Jose neighborhoods develop and reject the notion that this railroad trestle facilitated development of residential neighborhoods in Willow Glen. There is no doubt that T.S. Montgomery was a leading real estate developer in early 20th century San Jose. In fact, prominent buildings that are closely associated with Montgomery's real estate work are designated City Landmarks both for their direct association with Montgomery and their architectural value. However, if all property associated with T.S. Montgomery's real estate work were eligible for the National Register, or even local historic designation, that list would include much of San Jose. The subject residential neighborhoods developed by Montgomery around the trestle are not designated under the City's Landmark or Conservation Area programs. Montgomery's success as a real estate developer is not associated with this trestle.

The City finds that the trestle was only tangentially associated with the Santa Clara County fruit packing industry in that it is one small piece of dozens of transportation networks that served the industry. Research shows that the Western Pacific Railroad's role in the Santa Clara County fruit packing industry was dwarfed by that of the Southern Pacific Railroad. The Southern Pacific Railroad directly served the largest fruit packing plants in west San Jose; Calpak Plant No. 3 at San Carlos and Los Gatos Creek, and at Plant No. 51 at Bush and San Fernando, although connections allowed service to these facilities by the Western Pacific. Sanborn Fire Insurance Maps for Calpak Plant No. 3 from 1901 and 1917 show that this plant was already a large operation long before the Western Pacific Railroad built to San Jose in the 1920s. The City rejects the notion that the construction of this trestle was associated to the industrial development of west San Jose in any important way.

The City finds that the trestle is not associated with the development of the Western Pacific Railroad in any important way. The trestle is a small, common component of a branch line of a much larger railway. The Western Pacific San Jose Branch had to cross several small creeks between Niles Canyon and its terminus at The Alameda in San Jose. These crossings were relatively simple; hence, timber trestles were used. The trestle was one part of a larger coordinated rail network and is a common form that is not related to any unique or difficult crossing.

The City finds that the trestle is not representative of the movement in the early decades of the 20th century to eliminate vehicular-railroad conflict, in that the trestle carries a railroad over a waterway, and not over a road. It is, therefore, not directly associated with the problem or the solution. There are various extant grade separations in San Jose that are the result of the effort in San Jose to eliminate the choke point of the Southern Pacific's 4th Street tracks. Many of those grade separations are still in use.

Three Creeks Trail

San Jose has one of the nation's largest urban trail networks, with over 57 miles developed trails open to the public. One of the significant urban off-street trails currently under development is the proposed western alignment of the Three Creeks Trail, which contains the subject trestle. The viability and usefulness of the Three Creeks Trail as an off-street bicycle/pedestrian route depends on a crossing at Los Gatos Creek.

The Three Creeks Trail is located along the former Western Pacific railroad corridor and would extend from the existing Los Gatos Creek Trail at Lonus Street to the Coyote Creek Trail, thus interconnecting important trails. The crossing at Los Gatos Creek is critical to connect the 16.8 mile southern reach of the Coyote Creek Trail to Downtown San Jose's employment and special event centers. The crossing also provides an important trail connection from the community of Willow Glen to Downtown. The City acquired the land for the Three Creeks Trail in December 2011. The acquisition process took about 10 years, with effort spent on securing grants, negotiating partnership agreements, working with the State to oversee site clean-up, and manage all aspects of a real estate transaction. The purchase included the trestle structure within Los Gatos Creek between Lonus Street and Coe Avenue.

City's Evaluation of the Trestle

In 2004, the City conducted environmental analysis for the Los Gatos Creek Trail Reach 4 project which included a retrofit of the Trestle for trail use. The project envisioned that railroad tracks would be removed from the trestle, and a solid trail surface and safety rails would be installed. As part of 2004 planning effort, the California Department of Transportation submitted a Historic Property Survey Report to the California Office of Historic Preservation seeking comments on its determination of "No Historic Properties Affected" pursuant to Section 106 of the National Historic Preservation Act. On September 10, 2004, the State Historic Preservation Officer responded with a letter of concurrence with the determination of "No Historic Properties Affected." The City adopted an Initial Study and Mitigated Negative Declaration for the retrofit project in June 2004.

In December 2011, the City completed the purchase of the portion of the former Western Pacific right-of-way that includes the trestle. The City commissioned an engineering study to evaluate the retrofit of the trestle, as well as analyze a replacement option given that the trestle had deteriorated in the seven years since a potential retrofit was first analyzed by the City. Based on this study, the City determined the extent of a retrofit project would be much greater than previously anticipated and decided to consider a replacement. The City prepared a new Initial Study to evaluate the demolition and replacement of the Trestle. The City adopted the Initial Study and Mitigated Negative Declaration and recommended replacing the Trestle in January 2014 after finding that the Trestle is not a historic resource.

The City's environmental review was challenged in court, and the appeal regarding the lawsuit is pending. In the interim, the City accepted public comments for the scope of an EIR, including many helpful suggestions regarding the potential historic value of the trestle that were used as a basis for the research strategy for the historical evaluation report.

The City released a Draft EIR in January of 2015 containing the historical evaluation report prepared by Mr. Mikesell. The report describes the current status of the trestle, provides regulatory context, presents historical context of the structure of the trestle, and summarizes the history of San José and Willow Glen in relation to the railroad and canning industry. The report uses this background information to determine whether the trestle meets the criteria for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), or for designation as a City of San José City Landmark..

On March 4, 2015 the City of San Jose Historic Landmarks Commission held a public hearing to review and comment on the Draft EIR. The Commission was provided with both the Draft EIR and all public comments on the draft EIR that the City had received up until hearing date, as well as correspondence addressed directly to the Commission related to the item. The Commission took the following actions: (1) directed that a comment letter be sent disagreeing with the findings in the Draft EIR, and (2) directed that a City Landmark nomination be brought to the Commission at a future meeting for consideration.

On April 23, 2015, the City released the First Amendment to the Draft EIR and response to comments received during the circulation period. A number of comments provided additional information that was incorporated into the historical evaluation report; however, this information did not change the conclusion that the trestle is not a historic resource. A copy of the Historical Evaluation Report with updates based on community feedback is attached to this letter.

The Historic Landmarks Commission is an advisory body to the City Council and may only make a recommendation to the City Council on designation of City Landmarks. The City Council holds the sole discretion to designate a property as a City Landmark. On May 6, 2015, the Historic Landmarks Commission nominated the trestle for consideration as a City Landmark due to its association with the Santa Clara County fruit industry, the community of Willow Glen, the grade separation movement, and its rarity as one of the few remaining bridges of its kind in the County, and forwarded its recommendation to the City Council.

On May 19, 2015, the City Council considered the recommendation and rejected it. Based on the analysis presented by staff, the public testimony, and the analysis contained in the historical evaluation report, the City Council determined that the trestle is not a rare or important example of its type, was only tangentially related to the Santa Clara County fruit packing industry, is not representative of the grade separation movement, was not influential to the history of the community of Willow Glen, and is not associated with the development of the Western Pacific Railway in any important way. The City Council voted to deny the designation of the trestle as a City Landmark.

Trestle Replacement

The trestle is in a poor state of repair. The timbers that once supported the trestle structure show signs of dry rot and are missing in places. Fire damage is evident, with charred timbers throughout the structure. Photos showing the condition of the trestle in May 2014 are attached to this letter.

The trestle has a history of being set on fire. There have been two verified trestle fires and nine vegetation fires near the trestle in the past six years. Creosote timber construction is very vulnerable to fire, and there is a substantial risk that the wooden trestle would have to be replaced if it burns. Structural elements of the trestle would need to be repaired or replaced in order to establish structural integrity for reuse as a pedestrian and bicycle bridge. As the structure continues to age, however, the City anticipates that eventually repairs will no longer be sufficient to sustain the structure and removal would have to be considered.

The City has found that replacing the trestle bridge with a free-span steel bridge is the environmentally preferable alternative with regards to land use, hydrology and water quality, transportation and traffic, and biological resources. Retrofitting the trestle is not consistent with City of San Jose plans and policies for fiscally sustainable infrastructure and urban/wildland fire hazards. Should the trestle be retained and reused, long-term habitat loss would occur from removal of riparian vegetation to achieve a 25-foot maintenance and fire buffer around the trestle. A replacement clear-span bridge would require no such buffer. Further, a replacement clear-span bridge would allow more

natural, unobstructed flow conditions for Los Gatos Creek with corresponding biological and hydrological benefits. The National Marine Fisheries Service submitted a comment letter supporting the removal of creosote-laden timbers, which in their opinion would improve habitat conditions for steelhead salmon in Los Gatos Creek. The existing trestle obstructs the creek flow which requires the City to periodically remove debris to reduce the danger of flooding. The retrofit option would also require periodic short term closures of this critical trail connection for inspection and maintenance, and carry the potential for long term trail closure due to a catastrophic fire and/failure of structure.

For the reasons stated above, the City Council voted to approve demolition of the trestle and replacement with a free-span steel bridge.

Conclusion

Thank you for your consideration of the City's comments on the proposed nomination. The nomination is based on significance at the local level. The City Council and City staff have the most comprehensive understanding of what development patterns, persons, events and buildings are important to the City's history. Therefore, the City of San Jose is best equipped to determine local significance. The City Council has spoken on the local historical significance of this trestle: it was nominated to be a Landmark under the City program and the City Council denied that nomination. The City has heard and reheard the historic significance of the trestle and asks the Commission to honor the judgement of City of San Jose as a Certified Local Government and deny this application.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Sykes", with a long horizontal line extending to the right.

David Sykes
Assistant City Manager
City of San José

Attachments:
2015 Historical Evaluation Report
May 2014 Trestle Photos

Los Gatos Creek trestle – May 2014



Los Gatos Creek trestle – May 2014



Los Gatos Creek trestle – May 2014



Los Gatos Creek trestle – May 2014

