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Memorandum

To: Mike Lisenbee, Senior Project Manager
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Project: 1200-1310 Memorex Drive Impacts Analysis

Project No.: 191002

Date: April 17, 2020

Via: Email

I. INTRODUCTION

At the request of David J. Powers & Associates, Architectural Resources Group (ARG) prepared a preliminary impacts analysis for the demolition of the property at 1200-1310 Memorex Drive (APN 224-66-006) in Santa Clara, California. ARG previously prepared an Historic Resource Evaluation (HRE) for the subject property and recommended it as eligible for listing in the California Register of Historical Resources (California Register) under Criterion 1 (Association with Significant Events) for its association with the development of the modern electronics industry and the broader context of Silicon Valley's development in the 1960s and 1970s.¹ This memorandum provides a summary of the historic status of the property, an overview of the CEQA process as it relates to historical resources, a preliminary impact analysis for the proposed project, and identification of potential mitigation measures. To complete this memorandum, ARG reviewed renderings of the proposed project, as conveyed to ARG on April 1, 2020.

II. HISTORIC STATUS

A records search completed by Northwest Information Center (NWIC) staff on November 21, 2019, indicated that the industrial complex at 1200-1310 Memorex Drive had not been previously recorded in the national, state, or local registers, nor had it been evaluated as a contributor to an historic district eligible at the national, state, or local level. However, an evaluation of the property's eligibility for the California Register, prepared by ARG in late 2019, indicates that the complex at 1200-1310 Memorex Drive is historically significant as the first world headquarters of Memorex Corporation, one of the many electronics start-up companies that catalyzed the Santa Clara Valley's transformation into Silicon Valley during the postwar era.

¹ Architectural Resources Group, "1200-1310 Memorex Drive, Santa Clara, California, Historic Resources Evaluation," prepared for David J. Powers & Associates, December 2019.

Memorex Corporation holds particular significance within the context of the development of the modern electronics and computer industry due to its early innovations in the field of peripheral computer equipment. In 1968, while still headquartered at the subject property, Memorex released the first independently produced hard disk drives that were compatible with IBM computers. Because IBM dominated 71 to 83 percent of the global computer market at the time, its introduction of compatible computer equipment provided an important avenue for smaller electronics firms to establish themselves within the field.² Many other early electronics companies, including Marshall, Potter Instruments, Telex, Century Data, Control Data Corporation, and Ampex, released their own IBM-compatible plug-ins in subsequent years, and modern computer systems continue to accommodate singular components produced by disparate electronics companies. Memorex Corporation's development of the first IBM-compatible hard drive had a significant impact on the early electronics industry, and it developed and manufactured the product at the subject property in the late 1960s. For these reasons, the property appears to be eligible for listing in the California Register under Criterion 1 (Association with Significant Events). Lacking a significant association with a person or persons of historical importance and lacking architectural or engineering prominence, the property does not appear to be eligible for listing under Criteria 2 (Association with Significant Persons) or 3 (Architectural Significance). Evaluation for eligibility under Criterion 4 (Potential to Yield Information) was beyond the scope of the historic resource evaluation.

The period of significance for the subject property spans 1961 through 1971, the period in which Memorex Corporation was headquartered at this location. The subject property retains a relatively high degree of integrity with regard to the period of significance and therefore qualifies as an historical resource under CEQA (see below).

III. REGULATORY BACKGROUND

An overview of CEQA as it pertains to historical resources, the California Register, the City of Santa Clara's Criteria for Local Significance, and the Secretary of the Interior's Standards for Rehabilitation are provided below.

California Environmental Quality Act

When a proposed project may cause a substantial adverse change in the significance of an historical resource, CEQA requires a city or county to carefully consider the possible impacts before proceeding (Public Resources Code Section 21084.1). CEQA equates a substantial adverse change in the significance of an historical resource with a significant effect on the environment (Section 21084.1). CEQA explicitly prohibits the use of a categorical exemption within the CEQA Guidelines for projects that may cause such a change (Section 21084).

² Ross Knox Bassett, *To the Digital Age: Research Labs, Start-up Companies, and the Rise of MOS Technology* (Baltimore, MD: Johns Hopkins University Press, 2002), 222.

CEQA Guidelines section 15064.5(b) defines a “substantial adverse change” in the significance of an historical resource as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Further, that the significance of an historical resource is “materially impaired” when a project:

- “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources; or
- “demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources... or its identification in an historical resources survey..., unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.” (Guidelines Section 15064.5(b))

For the purposes of CEQA (Guidelines Section 15064.5), the term “historical resources” shall include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in, the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et. seq.).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be

considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4852) as follows:

- A. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- B. Is associated with the lives of persons important in our past;
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- D. Has yielded, or may be likely to yield, information important in prehistory or history. (Guidelines Section 15064.5)

California Register of Historical Resources

The California Register is the authoritative guide to the State’s significant historical and archaeological resources. It serves to identify, evaluate, register, and protect California’s historical resources. The California Register program encourages public recognition and protection of cultural resources and affords certain protections under CEQA. All resources listed in or formally determined eligible for listing in the National Register of Historic Places (National Register) are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances are eligible for listing in the California Register. The California Register criteria are modeled on the National Register criteria. An historical resource must be significant at the local, state, or national level under one or more of the following criteria:

- 1. It is associated with events or patterns of 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 (Criterion 1).
- 2. It is associated with the lives of persons important to local, California, or national history (Criterion 2).
- 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values (Criterion 3).
- 4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state or the nation (Criterion 4).

Like the National Register, evaluation for eligibility in the California Register requires an establishment of historic significance before integrity is considered. California's integrity threshold is slightly lower than the federal level. As a result, some resources that are historically significant but do not meet National Register integrity standards may be eligible for listing in the California Register.

In order for a property to qualify as an historical resource, significance must be established and the property must also retain "historic integrity of those features necessary to convey its significance."³ While a property's significance relates to its role within a specific historic context, its integrity refers to "a property's physical features and how they relate to its significance."⁴ Since integrity is based on a property's significance within a specific historic context, an evaluation of a property's integrity can only occur after historic significance has been established. To determine if a property retains the physical characteristics corresponding to its historic context, the National Register has identified seven aspects of integrity. These criteria are also used in evaluations for listing in the California Register.

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Setting* is the physical environment of an historic property.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form an historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and an historic property.

³ National Park Service, "How to Apply the National Register Criteria for Evaluation" (Washington, DC: National Park Service, 2002), 3, accessed October 15, 2018, <https://www.nps.gov/nr/publications/bulletins/nrb15/>.

⁴ Ibid., 44.

City of Santa Clara Criteria for Local Significance

The City of Santa Clara's Criteria for Local Significance establish an evaluation framework that help to determine significance for properties not yet included in the city's Historic Resources Inventory (HRI). Any building, site, or property in Santa Clara that is 50 years old or older and meets at least one of the following criteria for cultural, historical, architectural, geographical, or archeological significance is potentially eligible.⁵

Criteria for Historical or Cultural Significance

To be historically or culturally significant, a property must meet at least one of the following criteria:

1. The site, building or property has character, interest, integrity and reflects the heritage and cultural development of the city, region, state, or nation.
2. The property is associated with an historical event.
3. The property is associated with an important individual or group who contributed in a significant way to the political, social and/or cultural life of the community.
4. The property is associated with a significant industrial, institutional, commercial, agricultural, or transportation activity.
5. A building's direct association with broad patterns of local area history, including development and settlement patterns, early or important transportation routes or social, political, or economic trends and activities. Included is the recognition of urban street pattern and infrastructure.
6. A notable historical relationship between a site, building, or property's site and its immediate environment, including original native trees, topographical features, outbuildings or agricultural setting.

Criteria for Architectural Significance

To be architecturally significant, a property must meet at least one of the following criteria:

1. The property characterizes an architectural style associated with a particular era and/or ethnic group.
2. The property is identified with a particular architect, master builder or craftsman.

⁵ City of Santa Clara, "City of Santa Clara General Plan – 8.9 Historic Preservation and Resource Inventory," 8.9-18 and 8.9-19, accessed April 10, 2020, <https://www.santaclaraca.gov/Home/ShowDocument?id=3743>.

3. The property is architecturally unique or innovative.
4. The property has a strong or unique relationship to other areas potentially eligible for preservation because of architectural significance.
5. The property has a visual symbolic meaning or appeal for the community.
6. A building's unique or uncommon building materials, or its historically early or innovative method of construction or assembly.
7. A building's notable or special attributes of an aesthetic or functional nature. These may include massing, proportion, materials, details, fenestration, ornamentation, artwork or functional layout.

Criteria for Geographic Significance

To be geographically significant, a property must meet at least one of the following criteria:

1. A neighborhood, group or unique area directly associated with broad patterns of local area history.
2. A building's continuity and compatibility with adjacent buildings and/or visual contribution to a group of similar buildings.
3. An intact, historical landscape or landscape features associated with an existing building.
4. A notable use of landscaping design in conjunction with an existing building.

Criteria for Archaeological Significance

For the purposes of CEQA, an "important archaeological resource" is one which:

1. Is associated with an event or person of
 - a. Recognized significance in California or American history, or
 - b. Recognized scientific importance in prehistory.
2. Can provide information, which is both of demonstrable public interest, and useful in addressing scientifically consequential and reasonable or archaeological research questions;
3. Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind

4. Is at least 100 years old and possesses substantial stratigraphic integrity; or
5. Involves important research questions that historical research has shown can be answered only with archaeological methods.

According to Santa Clara City Code 18.106.060, an Environmental Impact Report (EIR) shall be required for any application to demolish a property listed on the HRI or a property determined to be eligible for listing. The demolition permit application and environmental impact report shall be referred to the Santa Clara Historical and Landmarks Commission (HLC) for a recommendation on whether to grant, modify, or deny the demolition permit application. The HLC recommendation shall be forwarded to the Architectural Committee of Santa Clara, which shall make a final decision on the application for demolition. The HLC shall recommend approval of a demolition permit, and the Architectural Committee shall approve a demolition permit, only if there are no viable alternatives for saving the property, and such alternatives have been fully addressed in an EIR.

Secretary of the Interior's Standards for Rehabilitation

The Secretary of the Interior is responsible for establishing standards for all programs under departmental authority and for advising federal agencies on the preservation of historic properties listed in or eligible for listing in the National Register. The Standards for Rehabilitation (Standards; codified in 36 CFR 67 for use in the Federal Historic Preservation Tax Incentives program) address the most prevalent treatment. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."⁶

Initially developed by the Secretary of the Interior to determine the appropriateness of proposed project work on registered properties within the Historic Preservation Fund grant-in-aid program, the Standards for Rehabilitation have been widely used over the years, particularly to determine if a rehabilitation qualifies as a Certified Rehabilitation for federal tax purposes. In addition, the Standards have guided federal agencies in carrying out their historic preservation responsibilities for properties in federal ownership or control and state and local officials in reviewing both federal and nonfederal rehabilitation proposals. They have also been adopted by historic preservation and planning commissions across the country.

The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic buildings of all materials,

⁶ Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (Washington, D.C.: National Park Service, 2017), 76.

construction types, sizes, and occupancy and a building's site, environment, and associated landscape features, as well as attached, adjacent, or related new construction.

As stated in the definition, the treatment "rehabilitation" assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alterations must not damage or destroy materials, features or finishes that are important in defining the building's historic character. For example, certain treatments – if improperly applied – may cause or accelerate physical deterioration of the historic building. This can include using improper repointing or exterior masonry cleaning techniques or introducing insulation that damages historic fabric. In almost all of these situations, use of these materials and treatments would result in a project that does not meet the Standards. Similarly, exterior additions that duplicate the form, material, and detailing of the structure to the extent that they compromise the historic character of the structure will fail to meet the Standards. The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

Under CEQA, a project that conforms with the Secretary of the Interior's Standards can generally be considered to be a project that will not cause a significant impact (14 CCR § 15126.4(b)(1)). In most cases, a project that meets the Secretary of Interior's Standards can be considered categorically exempt from CEQA (14 CCR § 15331).⁷

The ten Standards for Rehabilitation are:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

⁷ California Office of Historic Preservation, "California Office of Historic Preservation, Technical Assistance Series #1, California Environmental Quality Act (CEQA) and Historical Resources," 2001, accessed April 8, 2020, <http://www.ohp.parks.ca.gov/pages/1054/files/ts01ca.pdf>.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemicals or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

IV. IMPACT ANALYSIS

The industrial complex at 1200-1310 Memorex Drive is proposed for demolition and replacement by a multistory data center, including server storage and office space. The significance of an historical resource is considered to be “materially impaired” when a project demolishes or materially alters the physical characteristics that justify the determination of an historical resource’s significance (CEQA Guidelines §15064.5(b)). If the industrial complex at the subject property is demolished, the project would require the preparation of an EIR and a finding of a significant and unavoidable impact that could not be mitigated.

CEQA requires that all feasible mitigation be completed even if it does not mitigate below a level of significance (14 CCR § 15126.4(b)). Although recordation of a resource prior to demolition does not mitigate the physical impact on the resource, it serves a “legitimate archival purpose.”⁸ Documentation of historic buildings typically consists of Historic American Buildings Survey (HABS) recordation and the installation of a publicly visible, interpretive display at the property and/or offsite, at a relevant repository

⁸ California Office of Historic Preservation, “California Environmental Quality Act (CEQA) and Historical Resources.”

or other space in the public realm. Mitigation measures may also include the preparation of a narrated video walkthrough documenting the building and the collection of oral histories from relevant sources. These mitigation measures are discussed in detail below.

Historic American Buildings Survey (HABS) Recordation

HABS recordation is one of the most frequently required mitigation measures for historical resources subject to significant and unavoidable impacts. Prior to project implementation, the historical resource should be recorded to HABS standards established by the National Park Service, as detailed below.⁹

- A. A HABS written report should be completed to document the physical history and description of the historical resource, the historic context for its construction and use, and its historic significance. The report should follow the standard outline format described in the *Historic American Buildings Survey Guidelines for Historical Reports* in effect at the time of recording. The report should be prepared by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History.
- B. Large-format, black and white photographs of the historical resource should be taken and processed for archival permanence in accordance with the *HABS/HAER/HALS Photography Guidelines* in effect at the time of recording. The photographs should be taken by a professional with HABS photography experience. The number and type of views required should be determined in consultation with the local jurisdiction.
- C. Existing drawings, where available, should be reproduced on archival paper. If existing drawings are not available, a full set of measured drawings depicting existing conditions should be prepared. The drawings should be prepared in accordance with the *Historic American Engineering Guidelines for Drawings* (Chapter 4.0 Measured Drawings) in effect at the time of recording. The drawings should be prepared by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architecture or Historic Architecture.
- D. The HABS documentation, including the written report, large-format photographs, and drawings, should be submitted to appropriate repositories, such as the Santa Clara County Historical & Genealogical Society (SCCHGS), Silicon Valley Historical Association, Sourisseau Academy for State and Local History at San José State University, and/or the Computer History Museum in Mountain View. The documentation should be prepared in accordance with the archival standards outlined in the *Transmittal Guidelines for Preparing HABS/HAER/HALS Documentation* in effect at the time of recording. A professional who

⁹ National Park Service, "HABS Guidelines," accessed April 8, 2020, <https://www.nps.gov/hdp/standards/habsguidelines.htm>.

meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History should manage production of the HABS documentation.

Video Documentation

Video documentation of the subject property would supplement HABS documentation by recording the exterior and interior of the industrial complex at 1200-1310 Memorex Drive as it appears prior to project implementation. Using visuals in combination with active narration, the documentation should include as much information as possible about the spatial arrangement, circulation patterns, historic use, current condition, construction methods, and material appearance of the historic resource. The documentation should be conducted by a professional videographer, preferably one with experience recording architectural resources, and produced in conjunction with a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards.

It is recommended that the video documentation be preserved in an electronic format that is cross-platform and nonproprietary. Like HABS documentation, archival copies of the video documentation should be submitted to appropriate repositories, such as the SCCHGS, Silicon Valley Historical Association, Sourisseau Academy for State and Local History at San José State University, and/or the Computer History Museum in Mountain View. It may also be shared online via a freely accessible platform such as YouTube.

For a recent example of video documentation of an historic resource, see the video prepared by ARG and Stephen Schafer as part of the mitigation documentation package for 1500 Mission Street in San Francisco, California: <https://www.youtube.com/watch?v=9ZpfcibWRgw&feature=youtu.be>.

Interpretive Display

Interpretive displays vary widely in size, style, construction, and information capacity. Specifications for a particular interpretive display should consider a number of factors, including but not limited to the nature of the resource, the intended audience, and the location of the display. Although typically located at the subject property, offsite interpretive displays may be appropriate in certain cases, such as when the property is not publicly accessible for security or other reasons. In all instances, interpretive displays should be conducted by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards, in coordination with an exhibit designer.

Both onsite and offsite interpretive displays may be appropriate mitigation measures for the demolition of the industrial complex at 1200-1310 Memorex Drive. Onsite displays should be located in a prominent space, such as a lobby, where they may be viewed by employees and visitors to the property. Displays should be permanent and should address the history and architectural features of the industrial complex at 1200-1310 Memorex Drive and its operation during the property's period of significance.

Because of the nature of the proposed replacement project, however, the subject property may not be easily accessible by the public, and an offsite interpretive display may be recommended in place of or in addition to the onsite display. An offsite interpretive display should be located in a place with a connection to the subject property or its historical context. For example, the Computer History Museum in Mountain View may be an appropriate location for an interpretive display because of the substantial, contextual connection between the museum's mission and the subject property's significance within the development of the modern computer industry. The Computer History Museum also holds hundreds of Memorex Corporation artifacts and records in its repository, which would complement an interpretive display related to the subject property.

Oral History Collection

Oral history is a method of gathering and preserving the memories of people and communities, including personal commentaries of historical significance. Oral history interviews, which are typically conducted by an interviewer and recorded in an audio or video format, provide a fuller and more accurate account of an historical event or era by augmenting other archival materials. Recordings from an interview may be transcribed, summarized, and/or indexed and then placed in a physical library or other archival repository. They may also be made accessible electronically over the internet.¹⁰

Best practices for performing oral interviews are outlined by the Oral History Association (OHA), which was founded in 1966 and serves as the principal membership organization for those involved in the field of oral history.¹¹ The OHA outlines four key elements of oral history work, summarized below.

- A. The first element of oral history work is preparation. This includes developing an oral history process appropriate for the project at hand; engaging interviewers; identifying and engaging candidates (called "narrators") for interviews; preparing an open-ended outline of themes to be covered and general questions to be asked during the interview; and locating an appropriate repository to house the finished oral histories and related documentation.
- B. The second element of oral history work is the interview itself. Wherever possible, the interview should be conducted in a quiet location with minimal background noise. The interview should begin with a lead-in, given by the interviewer, with contextual information such as the names of participants, dates, location, and subject of the recording. Questions posed to the narrator should be open-ended, and the interviewer should ask follow-up questions seeking additional clarification, elaboration, and reflection.

¹⁰ For more information on conducting, preserving, and using oral interviews, see *The Oral History Manual, Third Edition*, by Barbara W. Sommer and Mary Kay Quinlan (Latham, MD: Rowman and Littlefield, 2018).

¹¹ "Best Practices," *Oral History Association*, accessed April 8, 2020, <https://www.oralhistory.org/best-practices/>.

- C. The third element of oral history work is the preservation of original recordings. Although no particular format is mandated, it is recommended that electronic files be preserved in formats that are cross-platform and nonproprietary; redundant copies should be made as a contingency. Whenever possible, oral histories should be deposited in a public repository, such as a library or archive, with the capacity to ensure long-term, professionally managed preservation and public access.
- D. The fourth and final element of oral history work is the matter of access and use. In order to enhance accessibility of oral history work, written documentation such as transcripts, indices with time tags, detailed descriptions of interview content should accompany audio or audio/digital files. Oral histories may also be made available electronically through a repository's online catalog or through a web endeavor, as a means of ensuring that the material is available to a broad public audience.

An oral history collection prepared for the proposed project would ideally focus on the operation of the Memorex Corporation between 1961 and 1971, when the subject property served as the company headquarters. A good faith effort should be made to identify at least one former employee of the Memorex Corporation who was employed at the subject property and is willing to participate as an interviewee. A list of guests at the Memorex at Fifty Reunion, hosted at the Computer History Museum in Mountain View in 2011, may serve as preliminary list of potential narrators. Early research suggests that at least one attendee, Edward Seaman, was employed by Memorex in California prior to 1971 and is still alive today.¹²

Oral history audio and visual files collected as part of a mitigation effort for 1200-1310 Memorex Drive should be conducted by a professional oral historian and preserved in an accessible, electronic format and submitted to appropriate repositories, such as the Santa Clara County Historical & Genealogical Society (SCCHGS), Silicon Valley Historical Association, Sourisseau Academy for State and Local History at San José State University, Oral History Center at the Bancroft Library in Berkeley, and/or the Computer History Museum, which currently houses more than one hundred oral history interviews related to the development of the modern computer industry. In the event that no appropriate narrators are identified, or in the event that all potential narrators decline to participate, a memorandum should be prepared to document the project methodology and efforts.

¹² "Memorex at 50," CHM Oral History Collection, Lot X6304.2012, Catalog 102738692, Computer History Museum, Mountain View, CA.