



HISTORIC RESOURCES & PERMIT REVIEW REQUIREMENTS

Historic resources enrich the quality of life in Palo Alto. They include buildings, structures, sites, and areas of historical, architectural, and cultural significance. The Planning Department groups historic resources according to the development application review procedures that apply. Some development projects involving historic resources are subject to review under the City's Historic Preservation Ordinance (Municipal Code Chapter 16.49) and/or the California Environmental Quality Act (CEQA), as explained below and on the reverse page.

What is a “Group A” Historic Resource?

A “Group A” historic resource is an existing property listed in the Palo Alto Historic Inventory, and subject to Historic Resources Board (HRB) review under the City's Historic Preservation Ordinance. A “Group A” resource may also be subject to CEQA review. “Group A” resources include historic properties that are **one or more of the following**:

- Listed in the City's Inventory as Historic Category 1-2; or
- Listed in the City's Inventory as Historic Category 3-4 and located in the Downtown Area; or
- Located in one of the City's locally designated historic districts, Professorville or Ramona Street.

What is a “Group B” Historic Resource?

A “Group B” historic resource is an existing property that was previously designated or formally evaluated and may be subject to CEQA review. “Group B” resources are subject to HRB review if CEQA review indicates that a resource may be impacted. “Group B” resources include historic properties that are **one or more of the following**:

- Listed in the City's Inventory as Historic Category 3-4 and located outside of the Downtown Area and local historic districts; or
- Listed in the National Register of Historic Places (NR) or the California Register of Historical Resources (CR); or
- Listed in the Palo Alto Historic Survey Update (Dames & Moore, 1997-2000) as NR-eligible or CR-eligible; or
- Determined CR-eligible via historic resource evaluation performed by a qualified historic preservation professional on behalf of the City or peer-reviewed by the City's consultant, pursuant to Comprehensive Plan Policy L7.2¹.

When Does a Property Require Evaluation as a Historic Resource?

A property that has not yet been evaluated or designated may qualify as a historic resource for the purposes of CEQA review. Development applications for these properties may require a Historic Resource Evaluation (HRE) report to complete CEQA review. The City of Palo Alto may require an HRE report should the property **meet BOTH of the following conditions**:

- A “discretionary” development application proposes demolition, new construction, new addition, or other substantial exterior alterations; and
- The existing development on the property is more than 45 years old.

For information on a specific property, please review a Parcel Report for the subject property, available at the City's website at www.cityofpaloalto.org/Departments/Planning-Development-Services/Current-Planning/Parcel-Reports or request a Parcel Report from City staff at: Development Services, 265 Hamilton Avenue; (650) 329-2496; planner@cityofpaloalto.org

¹ 2030 Comprehensive Plan Policy L-7.2 states, “If a proposed project would substantially affect the exterior of a potential historic resource that has not been evaluated for inclusion into the City's Historic Resources Inventory, City staff shall consider whether it is eligible for inclusion in State or federal registers prior to the issuance of a demolition or alterations permit.”

NOTE: Minor exterior improvements that do not affect the architectural integrity of potentially historic buildings shall be exempt from consideration. Examples of minor improvements may include repair or replacement of features in kind, or other changes that do not alter character-defining features of the building. Normal maintenance or repair, interior work, and landscaping for historic resources typically do not require historic review.



Historic Resources Application Review Procedures

	HISTORIC PRESERVATION ORDINANCE (PAMC 16.49) REVIEW PROCEDURES	CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW PROCEDURES
“GROUP A” HISTORIC RESOURCES	<p>Route any permit applications for exterior changes, including ministerial, to the Historic Preservation Planner.</p> <ul style="list-style-type: none"> ➤ The Planner reviews the application for consistency with the Secretary of the Interior’s Standards for Rehabilitation¹ “Standards” and the Historic Preservation Ordinance. ➤ If the project is inconsistent with the Standards, or it exceeds the scope of a “minor exterior alteration²” according to the Historic Preservation Ordinance, the Planner refers the application to the HRB. 	<p>Route discretionary development applications³ for exterior changes to the Historic Preservation Planner.</p> <ul style="list-style-type: none"> ➤ The Planner reviews the application for consistency with the Secretary of the Interior’s Standards for Rehabilitation¹ and potential impacts to a historic resource per CEQA. ➤ If CEQA analysis indicates that there may be a potential impact to an historic resource, the Planner refers the application to the HRB.
“GROUP B” HISTORIC RESOURCES	<p>Not subject to the review procedures in the City’s Historic Preservation Ordinance.</p> <p>Only “Group A” properties are subject to review under the Historic Preservation Ordinance, see PAMC 16.49.050.</p> <p>Pursuant to Comprehensive Plan Policy L-7.2, a Historic Resource Evaluation (HRE) may be required to demolish a potentially eligible historic resource. If an HRE determines that a property is eligible for the California Register (CR), it is classified and reviewed as a “Group B” resource. If the evaluation determines that a property is not CR-eligible, it is considered a non-resource and reviewed accordingly.</p>	<p>Route discretionary development applications³ for exterior changes to the Historic Preservation Planner or the City’s historic preservation consultant.</p> <ul style="list-style-type: none"> ➤ The Planner reviews the application for consistency with the Secretary of the Interior’s Standards for Rehabilitation¹ and potential impacts to a historic resource per CEQA. ➤ If CEQA analysis indicates that there may be a potential impact to an historic resource, the Planner refers the application to the HRB.
PROPERTIES THAT REQUIRE EVALUATION AS HISTORIC RESOURCES	<p>Not subject to the review procedures in the City’s Historic Preservation Ordinance.</p> <p>Only “Group A” properties are subject to review under the Historic Preservation Ordinance, see PAMC 16.49.050.</p>	<p>Route discretionary development applications³ for demolition, new construction, addition, or substantial exterior alterations to the Historic Preservation Planner or City’s historic preservation consultant.</p> <ul style="list-style-type: none"> ➤ The staff determines if a Historic Resource Evaluation (HRE) report is required to conduct and complete CEQA review. If a property is found to be eligible for the California Register of Historical Places, it is reviewed as a “Group B” historic resource.

¹ The Standards are found on the National Park Service’s website: <https://www.nps.gov/tps/standards/rehabilitation.htm>.

² Minor exterior alterations are those alterations the Director of Planning and Development Services or his/her designee determines will not adversely affect the exterior architectural characteristics nor the historical or aesthetic value of the historic structure, its site, or surroundings.

³ Discretionary development applications include: Architectural Review; Design Enhancement Exception; Home Improvement Exception; Neighborhood Preservation Exception; Single Family Individual Review; Site and Design Review; Variance