



**Palo Alto Historic Resources
Reconnaissance Survey
Community Meeting #2**

October 24, 2023

Agenda

Welcome & Project Team Introductions

Project Background & Purpose

Findings of the 2023 Reconnaissance Survey

Property Nomination Memos

Palo Alto Historic Inventory Nomination Process

Preliminary Schedule for Nomination Hearings

Brief Q & A

Application of Incentives - Case Studies

Closing Q & A

Project Team Introductions

City of Palo Alto:

- Amy French, Chief Planning Official & HRB Liaison
- Kristina Paulauskaite, Associate Planner
- Veronica Dao, Administrative Assistant

M-Group:

- Isabel Castellano, Historic Preservation Consultant

Page & Turnbull:

- Ruth Todd, Principal
- Christina Dikas, Senior Architectural Historian
- Barrett Reiter, Architectural Historian



Project Background

1979 Historical Resource Survey

- Identified initial landmark properties for listing in Palo Alto's Historic Inventory
- Nominated Professorville HD and some individual buildings to the National Register

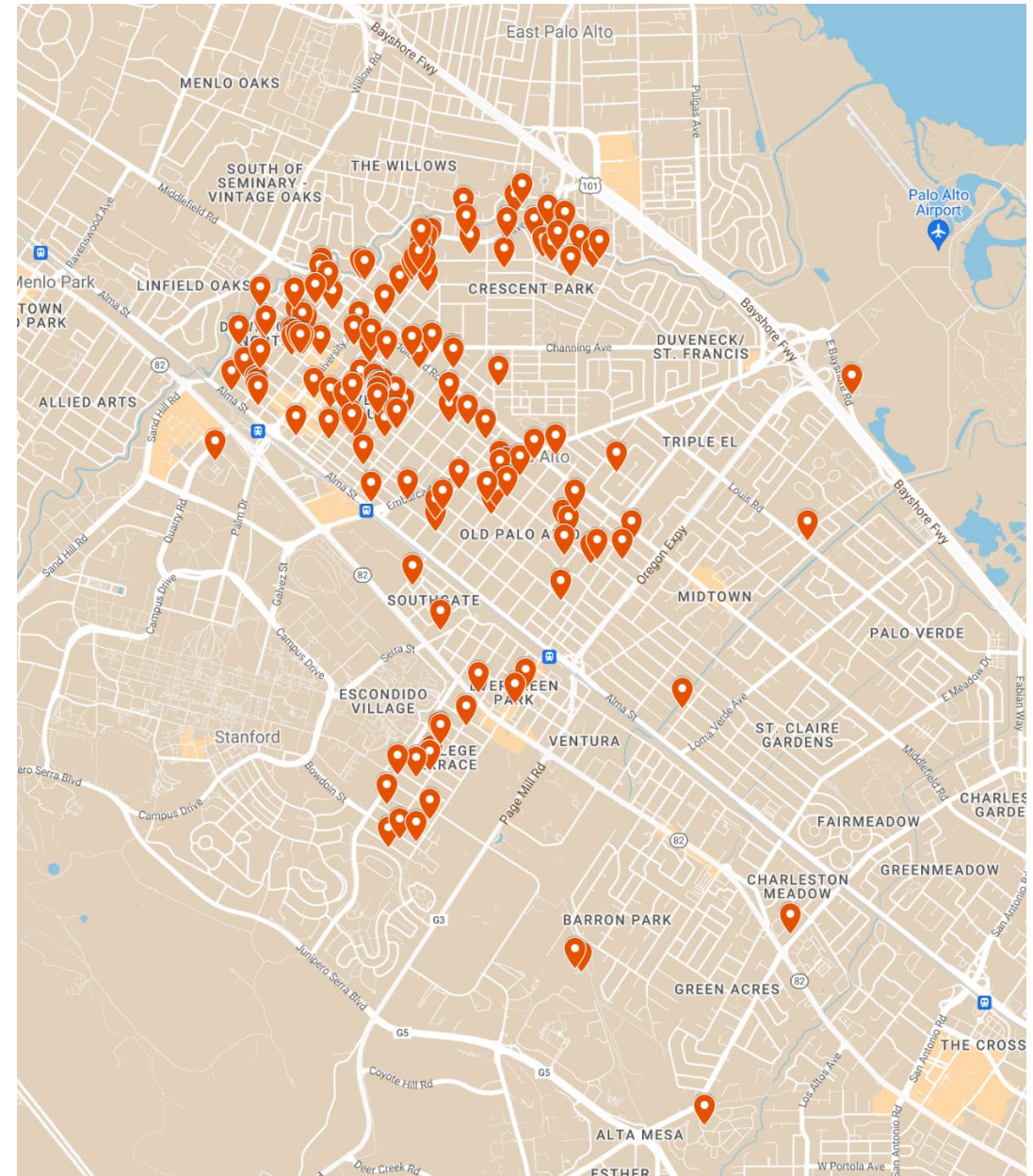
1997-2001 Historical Survey Update

- Identified 165 National Register-eligible properties
- Priority properties for additional study were categorized as likely eligible for the California Register
- Provided initial historic contexts on Palo Alto architecture and historic development



What is the Purpose of the 2023 Reconnaissance Survey?

- Verify the presence of the 154 buildings and structures previously identified as “eligible for the National Register” during the 1997-2001 Palo Alto Survey Update
- Verify the presence of 13 properties that were identified as individually eligible for listing in the California Register through completed Historic Resource Evaluations
- Identify if the properties remain eligible as historic resources
- Nominate those properties that remain eligible as historic resources to the Palo Alto Historic Inventory



2023 Survey Report Findings

- 165 properties were identified in 1997-2001 survey as National Register eligible
 - 11 were previously listed in the Palo Alto Historic Inventory
 - 11 have been demolished
 - 4 have been significantly altered to have lost integrity
- 139 National Register-eligible properties and 11 California Register-eligible properties were found to remain present and appear to retain historic integrity
 - Historic integrity is the ability of a property to convey its historic significance through its physical characteristics



Benefits and Drawbacks for Properties on the Palo Alto Historic Register

Benefits

- Application of the **California Historic Building Code**
- Palo Alto Building Code (PABC) and Palo Alto Municipal Code (PAMC) offer **development incentives** that assist owners of historic resources
- R-1 zoned parcels with two homes (one listed historic) can create a **flag lot**
- Income-producing properties may be able to apply for **Federal Historic Rehabilitation Tax Credits**
- Palo Alto Planning Department is available to provide **design guidance** regarding proposed projects
- Potential property tax reduction incentive through a **Mills Act Program**, if Council adopts a program

Drawbacks

- Common fear about historic properties and review procedures
- Major alterations or demolition may undergo review by the HRB
- Environmental Review (CEQA) may be required (time/cost)

Neither a Benefit nor Drawback

- No requirement to “restore”
- No restrictions on interior alterations and flexibility with change to other areas
- Unable to apply SB 9 to a single-family residential zoned historic property (subdivide or create duplex)

Property Nomination Memos

- 150 properties were reviewed for designation to the Palo Alto Historic Inventory
- Previously identified CR/NR Criteria were translated to Palo Alto Historic Inventory Designation Criteria
- Memos were assembled for each property and include:
 - Summary of 2001 Survey Findings
 - Summary of 2023 Survey Findings
 - Recommendation for Designation Criteria and Categories for the Palo Alto Historic Inventory
 - Prior historic evaluation (attached to each memo)



Property Nomination Memos

- Page & Turnbull received initial feedback from HRB regarding Palo Alto Historic Categories
- Memos will be available at least one week before each HRB hearing with the HRB Packet (posted online)



2023 NOMINATION MEMO

PAGE&TURNBULL



2601 EAST BAYSHORE ROAD

Historic Name: Federal Telegraph Company—Marsh Station
APN: 008-04-001

1997-2001 SURVEY UPDATE SUMMARY

Identified National Register Criteria of Significance: Criterion A (Events)
Identified Period of Significance: 1921-1951

Summary of Significance: The property at 2601 East Bayshore Road, formerly known as the Federal Telegraph Company - Marsh Station, was found nationally significant under Criterion A as the best surviving remnant of the Federal Telegraph Company which was founded in Palo Alto and made groundbreaking contributions to the field of radio communications.

2023 RECONNAISSANCE SURVEY SUMMARY

Alterations Since 2001: Three structures were demolished in 2017 and a fourth structure was demolished in 2019; the remaining building was fenced in 2017.

Status in 2023: Extant, retains adequate historic integrity.

Recommended Revisions to Significance: The previously determined period of significance for the property was 1921-1951, ending 50 years prior to 2001 due to guidance for listing on the National Register of Historic Places, not due to a clear change in use or an end to the property's significance. A revised period of significance, beginning in 1921 and ending ca. 1977 would end with the sale of the property to the City of Palo Alto, demonstrating a change in ownership (although it continued to operate until after 2001). Additional research would need to be undertaken to further refine the period of significance and determine a date at which the critical work of the station ceased.



Figure 1: 1997-2001 Survey Update photograph.



Figure 2: 2023 Reconnaissance Survey photograph.

¹ Note that the property is listed in 2001 Survey Report summary tables as significant under Criterion C (architecture) in addition to Criterion A (Events); however, all available DPR forms created during the 2001 Survey only include an evaluation for Criterion A significance.

Imagining change in historic environments through design, research, and technology

170 MAIDEN LANE, 5TH FLOOR SAN FRANCISCO, CALIFORNIA 94108 TEL 415-362-5154

PREVIOUS DOCUMENTATION

2001 DPR FORM

State of California — The Resources Agency DEPARTMENT OF PARKS AND RECREATION PRIMARY RECORD		Primary # _____ HRI # _____ Trinomial _____ NRHP Status Code <u>3S</u>
Other Listings	Review Code	Reviewer
Review Code	Reviewer	Date
Page <u>1</u> of <u>7</u> *Resource Name or #: (Assigned by recorder) <u>2601 East Bayshore Road</u>		
P1. Other Identifier: <u>2601 East Bayshore Road</u>		
P2. Location: <input type="checkbox"/> Not for Publication <input checked="" type="checkbox"/> Unrestricted *a: County <u>Santa Clara</u>		
and (P2c, P2e, and P2b or P2d. Attach Location Map as necessary.)		
*b. USGS 7.5' Quad <u>Palo Alto, CA</u> Date <u>1991</u> T: <u> </u> R: <u> </u> % of <u> </u> Sec: <u> </u> B.M.		
c. Address <u>2601 East Bayshore Road</u> City <u>Palo Alto</u> Zip <u>94301</u>		
d. UTM: (Give more than one for large and/or linear resources) Zone: <u> </u> mE/ <u> </u> mN		
*e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) APN <u>8-4-1</u>		
*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)		
The property at 2601 East Bayshore Road, on the east side of Palo Alto between U.S. 101 and the south end of San Francisco Bay, consists of about 36 acres enclosed by a chain link fence. This enclosed area is surrounded by about 123 acres of marshland known as the Emily Renzel Wetlands. Within the fenced area there appear to be five buildings and several antennas and arrays. Because of the size of the property and the location of these features inside the chain link fence, the buildings and antennas must be viewed from a distance and cannot be seen clearly or completely. In addition, several anchorages for a 626-foot tall steel tower (demolished in 1960) are visible in scattered locations inside and outside the fenced area. These are massive concrete blocks with embedded steel hooks to which were once affixed cables that supported the tower and wires than served as parts of the antenna.		
See continuation sheet		
*P3b. Resource Attributes: (List attributes and codes) HP11		
*P4. Resources Present: <input checked="" type="checkbox"/> Building <input checked="" type="checkbox"/> Structure <input type="checkbox"/> Object <input type="checkbox"/> Site <input type="checkbox"/> District <input type="checkbox"/> Element of District <input type="checkbox"/> Other (isolates, etc.)		
P5b. Description of Photo: (View, date, accession #) <u>2601 East Bayshore Rd.; view northeast; 08/08/01; by B. Vahey; roll BRV-XX; neg #21</u>		
*P6. Date Constructed/Age and Source: <input checked="" type="checkbox"/> Historic <input type="checkbox"/> Prehistoric <input type="checkbox"/> Both <u>newspapers</u>		
*P7. Owner and Address: <u>City of Palo Alto</u>		
*P8. Recorded by: (Name, affiliation, and address) <u>Michael Corbett, Dames & Moore</u> <u>221 Main Street, Suite 600</u> <u>San Francisco, CA 94105</u>		
*P9. Date Recorded: <u>8 August 2001</u>		
*P10. Survey Type: (Describe) <u>Intensive</u>		
P11. Report Citation*: (Cite survey report and other sources, or enter "none".) <u>Palo Alto Historic Survey Update (Corbett and Bradley for Dames & Moore)</u>		
*Attachments: <input type="checkbox"/> NONE <input checked="" type="checkbox"/> Location Map <input type="checkbox"/> Sketch Map <input type="checkbox"/> Continuation Sheet <input checked="" type="checkbox"/> Building, Structure and Object Record <input type="checkbox"/> Archaeological Record <input type="checkbox"/> District Record <input type="checkbox"/> Linear Feature Record <input type="checkbox"/> Milling Station Record <input type="checkbox"/> Rock Art Record <input type="checkbox"/> Artifact Record <input type="checkbox"/> Photograph Record <input type="checkbox"/> Other (List) _____		
DPR 523A (1/95)/ Ebay2601.f1.wpd		*Required information.

or

HISTORIC RESOURCE EVALUATION

PAGE&TURNBULL

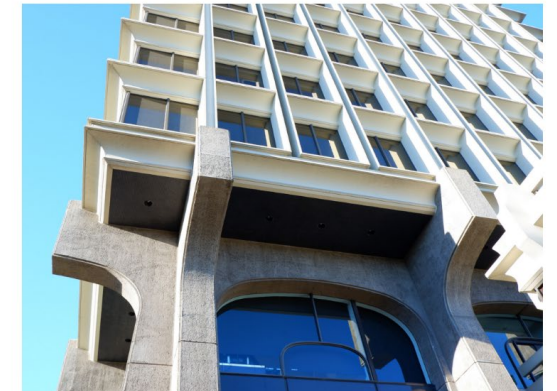


PALO ALTO OFFICE CENTER 525 UNIVERSITY AVENUE HISTORIC RESOURCE EVALUATION

PALO ALTO, CALIFORNIA
[16252A.47]

PREPARED FOR:
CITY OF PALO ALTO PLANNING & DEVELOPMENT SERVICES

December 3, 2020



National Register (NR) and California Register (CR) Designation Criteria

Criterion NR A/CR 1 (Events): Associated with events that have made a significant contribution to the broad patterns of our history

Criterion NR B/CR 2 (Persons): Associated with the lives of significant persons in our past

Criterion NR C/CR 3 (Architecture): 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 NR D/CR 4 (Information Potential): Has yielded or may be likely to yield information important in history or prehistory

Designation Criteria for Palo Alto Historic Inventory

- Criterion 1:** The structure or site is identified with the lives of historic people [PERSONS] or with important events in the city, state or nation [EVENTS];
- Criterion 2:** The structure or site is particularly representative of an architectural style [ARCHITECTURE] or way of life important to the city, state or nation [EVENTS];
- Criterion 3:** The structure or site is an example of a type of building which was once common, but is now rare [ARCHITECTURE];
- Criterion 4:** The structure or site is connected with a business or use which was once common, but is now rare [EVENTS];
- Criterion 5:** The architect or building was important [ARCHITECTURE];
- Criterion 6:** The structure or site contains elements demonstrating outstanding attention to architectural design, detail, materials or craftsmanship [ARCHITECTURE].

Designation Categories for Palo Alto Historic Inventory [1 of 3]

Category 1: An “Exceptional Building” of pre-eminent national or state importance. These buildings are meritorious works of the best architects, outstanding examples of a specific architectural style, or illustrate stylistic development of architecture in the United States. These buildings have had either no exterior modifications or such minor ones that the overall appearance of the building is in its original character.

Threshold for Category 1 Properties in 2023 Reconnaissance Survey: Properties that were designed or constructed by prominent architects and builders previously identified as significant or are excellent examples of a style.



Listed Category 1 building: Pettigrew House, 1336 Cowper Street, George Washington Smith.

Designation Categories for Palo Alto Historic Inventory [2 of 3]

Category 2: A “Major Building” of regional importance. These buildings are meritorious works of the best architects, outstanding examples of an architectural style, or illustrate stylistic development of architecture in the state or region. A major building may have some exterior modifications, but the original character is retained.

Threshold for Category 2 Properties in 2023 Reconnaissance Survey: Properties that are good examples of a style or a rare building type. Associations with individuals who were found to have made significant professional or personal accomplishments that demonstrate and enrich the history of Palo Alto are also represented under Category 2.



Listed Category 2 building: Dunker House, 420 Maple Street, Birge Clark.

Designation Categories for Palo Alto Historic Inventory [3 of 3]

Category 3 or 4: A “Contributing Building” which is a good local example of an architectural style and relates to the character of a neighborhood grouping in scale, materials, proportion or other factors. A contributing building may have had extensive or permanent changes made to the original design, such as inappropriate additions, extensive removal of architectural details, or wooden facades resurfaced in asbestos or stucco.

Threshold for Category 3 Properties in 2023 Reconnaissance Survey: Properties that are good examples of early development patterns or are common or typical buildings that retain their historic integrity to a high degree. These buildings are not particularly rare but have *very good to excellent historic integrity*.

Threshold for Category 4 Properties in 2023 Reconnaissance Survey: Properties to be listed as Category 4, are similar in level of significance to Category 3, but *have been altered to a higher degree and may have good to poor historic integrity*.

Nomination Process [1 of 2]

1. Nomination Memos and Staff Report shared at least one week before each HRB Hearing
 - Notices sent to remind property owners of upcoming hearing for their property
 - Owners encouraged to review and provide comment ahead of the hearing
2. HRB Hearings – recommend designation of resources to proceed to City Council (Spring 2024)
 - Owner opportunity to submit comment (written or in-person) to HRB



Nomination Process [2 of 2]

3. City Council Nomination Hearings (Spring 2024) – review and act on HRB recommendations
 - Owner opportunity to submit comment (written or in person) to City Council
 - City Council may take owner comments and feedback into consideration (at their discretion)
 - Properties are listed on the Palo Alto Historic Inventory



Property Distributions for Nomination Hearings

Previously identified for significance related to:

- Architecture and Events (68)
- Architecture only (29)
- Events only (9)
- Persons (28)

California Register-Eligible properties: 9

Properties with ongoing or approved projects: 4



Nomination Hearings Schedule

HRB Hearings – November 2023 to January 2024

- November 9, 2023
 - Architecture and Events properties (68)
- December 14, 2023
 - Architecture (29); Events (9)
- January 11, 2024
 - Persons (28); California Register (9);
Approved Project (4)



City Council Hearings – Spring 2024



Brief Q & A about the Nomination Process

Application of Incentives - Case Studies

Benefits

- Application of the **California Historic Building Code**
- Income-producing properties may be able to apply for **Federal Historic Rehabilitation Tax Credits**
- Palo Alto Planning Department is available to provide **design guidance** regarding proposed projects
- Palo Alto Municipal Code (PAMC) offer **development incentives** that assist owners of historic resources
- R-1 zoned parcels with two homes (one listed historic) can create a **flag lot**
- **HRB provides guidance** and recommendations on significant modifications to listed Inventory properties
- Potential property tax reduction incentive through a **Mills Act Program**, if Council adopts a program

Neither a Benefit nor Drawback

- No requirement to “restore”
- No restrictions on interior alterations and flexibility with change to other areas
- Unable to apply SB 9 to a single-family residential zoned historic property (subdivide or create duplex)

California Historic Building Code (SHBC)

- Can be used for a property on an existing national, state or local historical register or an official inventory
- Provides an alternative code that is “reasonably equivalent” to the regular code



The screenshot shows the website for the California Division of the State Architect. The page title is "California Historical Building Code". The main content area contains the following text:

HOME > DIVISION OF THE STATE ARCHITECT > RESOURCES > CHBC

California Historical Building Code

The State Historical Building Code applies to qualified historical buildings and structures as defined by the State Historical Building Code. Qualified historical buildings and structures is defined in Chapter 2, Section 8-218 of the California Historical Building Code and includes any building, site, structure, object, district or collection of structures, and their associated sites.

CONTACT DSA HEADQUARTERS

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The California Historical Building Code (Title 24, Part 8) is the latest regulation adopted by the State Historical Building Safety Board. Please note that the term “State Historical Building Code” refers to Health and Safety Code, Part 2.7, Division 13, Sections 18950–18961.

[2016 California Historical Building Code, Title 24, Part 8](#), is effective January 1, 2017 through December 31, 2019. (Scroll down to “PART 8 - CALIFORNIA HISTORICAL BUILDING CODE - (HTML)” and click on “HTML” link for online access to the CHBC)

The California Historical Building Code can also be ordered from the [International Code Council](#).

Federal Rehabilitation Tax Credit

- 20% federal tax credit on qualified project costs
 - A tax *credit* to offset federal taxes owed
 - 5-year recapture period
- Property must be income-producing (commercial property or rental property)
- Must be listed in the National Register by the time the credit begins
- Reviewed by the State Office of Historic Preservation and the National Park Service



Carson Block, Ukiah, CA – a federal tax credit project. Before at left; After at right.

Incentives – Case studies of Flag Lots in R1 zone allowed due to historic listing

Boyce 'sister' homes

Note: RE, R2, RMD zones also can do flag lots for listed homes where the flag lot does not need to be 20% larger as required for non-historic homes



Incentives – Case studies of Home Improvement Exception approvals allowing additional floor area 250 sf beyond maximum allowable and other modifications needing exceptions

Professorville contributor: 3,020 sf on a corner lot of 7875 sf increased to 3,329 sf



(HIE) process for two requests: (1) a setback encroachment to allow the primary building and basement to encroach up to 4 feet into the required 20 foot front yard setback (an increase from current 8' setback); and (2) allowance of 250 square feet of floor area in excess of that allowed on the site, provided that the requested addition would be in substantial conformance with the SISR standard. The first HIE request would improve the non-compliance of the existing structure by setting the building back 7

LOT AREA:	7,875 SQ. FT.
ZONE:	R1
STORIES:	2

MAXIMUM FLOOR AREA:	3,113.0 SQ.FT.
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MAX FLOOR AREA WITH 250SQ.F. HIE ALLOWANCE:	3,363.0 SQ.FT.
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MAXIMUM LOT COVERAGE:	2,756.0 SQ.FT.
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EXISTING FLOOR AREA:	
FIRST FLOOR:	1,665.0 SQ.FT.
SECOND FLOOR:	1,149.0 SQ.FT.
ATTIC AREA ABOVE 5'-0"	29.0 SQ.FT.
HOUSE TOTAL:	2,863.0 SQ.FT.

DETACHED GARAGE:	400.0 SQ.FT.
DETACHED COTTAGE:	228.0 SQ.FT.
EXISTING SITE TOTAL:	3,491.0 SQ.FT.

PROPOSED ALTERATIONS:	
(N) SUN ROOM ADDITION:	34.25 SQ.FT.
(N) FAMILY ROOM ADDITION:	70.0 SQ.FT.
(N) SECOND FLOOR ADDITION:	135.25 SQ.FT.
REMOVE NON-HISTORIC AREA:	< 12.0 SQ.FT.>
REMOVE NON-COMPLIANT AREA:	<161.25 SQ.FT.>
PROPOSED HOUSE TOTAL:	2,923.25 SQ.FT.

DETACHED GARAGE:	400.0 SQ.FT.
REMOVE DETACHED COTTAGE:	<228.0 SQ.FT.>
PROPOSED SITE TOTAL:	3,329.25 SQ.FT.

MAX. FOR HOUSE: 2,936.0 SQ.FT. w/HIE ALLOWANCE

PROPOSED LOT COVERAGE:	
PROPOSED FIRST FLOOR:	1,616.0 SQ.FT.
DETACHED GARAGE:	400.0 SQ.FT.
COVERED PORCH:	45.0 SQ.FT.
PROPOSED SITE TOTAL:	2,061.0 SQ.FT.

21.20.301 Flag lots

- Access from the flag lot to a public street shall not be over an easement but over land under the same ownership as the flag lot. Such access shall have a minimum width of fifteen feet and shall have a paved way not less than ten feet in width.
- If the flag lot or adjacent lot to be created contains a residence with recorded preservation covenants, the flag lot area is not required to exceed the low requirement of the zone district and the flag lot access may be over an easement or land under the same ownership, the access shall have a minimum width of twelve feet for a maximum length no more than 100 feet, and shall have a paved way not less than ten feet in width, and no request for nor approval of exceptions to said standards shall be required.

Before 2009, R1 zoned property was not allowed to create flag lots, and RE, R2 and RMD zoned property could only create flag lots if the lot area exceeded the minimum lot size by 20% (exclusive of the portion used to access a public street). The city allows flag lots if all of the circumstances exist:

- At least one of the two homes is listed on the City's inventory (Category 1-4), or contributing structures located within a locally designated historic district, or eligible for the National or California Registers, and the HRB has determined that at least one existing residence on the property has historic integrity and qualifies for listing on the City's Historic Inventory.
- The two residences on the property were in existence as of January 28, 2009, and no increase in the total number of residences on the site is proposed
- Separate lots are proposed to be created, each not less than 4,000 sf in the R-1 district if only one residence is historic or 80% of the minimum lot size for the R-1 subdistricts; if both residences are historic and subject to a covenant, the allowable minimum lot size is 2,000 sf
- The resultant parcel lines may create less than minimum lot size (no less than the area stated in item (3) of this section), site width and depth, setback and daylight plane encroachments, floor area and site coverage exceeding the maximum allowable for existing development with respect to each new parcel, without the need for approval of a Variance or HIE, but would not generally increase any existing noncomplying building features; however, the PDS Director can allow minor additions for functional improvements
- A covenant is recorded to run with the land in perpetuity, assuring that the historic residences will be preserved and maintained consistent with the Secretary of the Interior's Standards for Historic Rehabilitation through compliance with Historic Resources Board review and recommendations. The covenant will stipulate that HRB review is required for all major projects on the site including significant changes to any non-historic residence. Any modifications to a non-historic residence must be compatible with the historic residence and satisfy the Secretary of Interior's Standards for Historic Compatibility.
- Application of the state Historic Building Code is available for use on any eligible building and residences subject to a covenant must meet all government health, life and safety codes.

18.12.140 Historical Review and Incentives

(b) Exemptions to gross floor area requirements are available for historic residences pursuant to the definition of gross floor area in Section [18.04.030](#)(65)(C)(ii). Home improvement exceptions provide for additional square footage and certain other exceptions for historic homes pursuant to Section [18.12.120](#).

(c) Existing R1 parcels containing two residences may be subdivided into more than one ownership (subject to circumstances enumerated in item c).

18.10.130 Historical Review and Incentives

(b) Exemptions to gross floor area requirements are available for historic residences pursuant to the definition of gross floor area in Section [18.04.030](#)(65)(D)(vii). Home improvement exceptions provide for additional square footage and certain other exceptions for historic homes pursuant to Section [18.12.120](#) (R-1 Chapter).

(c) Existing parcels in the R-2 or RMD districts containing two residences may be subdivided into **two** ownerships (subject to circumstances enumerated in item c)



Note: PC4973 was the case that preceded item (c). Two homes with one listed home on an R1 lot on Addison became two smaller lots.

Project Documents are Available Online

Resources on the City of Palo Alto's Planning & Development website

<https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Historic-Preservation/2023-Reconnaissance-Survey>

- Include:
 - [A map of the 155 properties surveyed](#)
 - [2023 Reconnaissance Survey Report](#)
 - [Frequently Asked Questions](#)
 - [Preservation Incentives](#)
 - HRB Nomination Hearing Schedule
 - October Community Meeting Presentation

Community Outreach

Community outreach will continue through the City Council hearing(s) in Spring 2024.

The contact form for the project is available on the project webpage and will put you in contact with Amy French, Chief Planning Official, and Isabel Castellano, M-Group Historic Preservation Consultant.





Thank you!

Questions?

