

MEMORANDUM

DATE	June 25, 2024	PROJECT NUMBER	P24041
TO	Audrey Carlson, Lisa Amoroso, Mollie Fucilla	PROJECT	1485 Fremont Avenue, Los Altos, CA
OF	Fucilla Los Altos LLC	FROM	Stephanie Hodal, Page & Turnbull Stacy Kozakavich, Page & Turnbull
CC	Christina Dikas, Page & Turnbull	VIA	Email

REGARDING 1485 Fremont Avenue, Los Altos – SOIS Analysis Memorandum

INTRODUCTION

This Secretary of the Interior's Standards (SOIS) Analysis Memorandum has been prepared at the request of Audrey Carlson, Lisa Amoroso, and Mollie Fucilla in advance of proposed alterations to the parcel at 1485 Fremont Avenue, Los Altos (APN #197-16-064) (**Figure 1**). The subject property is a 1.5-acre residential parcel with a house, garage with apartment, and site design completed in 1927 (**Figure 2 and Figure 3**). The historic significance of the property, which is listed on the City of Los Altos Historic Resources Inventory, was evaluated in 2011 and 2024 using State of California Department of Parks and Recreation (DPR) 523 forms (**Attachment A**). The proposed project would divide the current parcel into two separate parcels and would relocate the existing garage to the south, adjacent to the existing residence and set back toward the new rear property line. (**Figure 5**).

Methodology

This report includes a summary of the property's current historic status, a brief physical description, a list of character-defining features that enable the property to convey its historic significance and the evaluation using the *Secretary of the Interior's Standards for Rehabilitation*. To review the proposed alterations, Page & Turnbull staff consulted the drawing set entitled CAF Tentative Tract Map prepared by Young and Borlik Architects, dated June 25, 2024 (**Attachment B**). Previous documentation referenced included a Preliminary Review Letter dated August 10, 2021 between the City of Los Altos Community Development Department and Terry Brown representing the owner in response to a Preliminary Project Review Application; and a packet of information regarding the history of past lot line adjustments at the property from 1994 through approximately 2007. Page & Turnbull staff requested and reviewed building permits available from the City of Los Altos Building

Division and visited the Los Altos History Museum to view historic photographs and a copy of the publication, *A House Within An Orchard*, by Sewall Bogart.¹ Additional research was conducted through online resources including the Los Angeles Public Library Collection for digital Sanborn maps, HistoricAerials.com and the University of California Santa Barbara FrameFinder for historic aerial photographs, Ancestry.com, and Newspapers.com.

Summary of Findings

Page & Turnbull staff evaluated the proposed project using the Secretary of the Interior's Standards for Rehabilitation.² Because the relocated garage would remain predominantly to the rear of and visually subordinate to the main house, the project was found to fully comply with all of the ten standards. It is Page & Turnbull's opinion that proposed alterations would not impact the integrity of the site which would retain its eligibility for listing on the Los Altos Historical Resource Inventory. The proposed project would therefore not be anticipated to cause a substantial adverse change to a historical resource for the purposes of review under the California Environmental Quality Act (CEQA).

¹ Sewall Bogart, *A House Within An Orchard*, (Redwood City, California: Reflections, 1994).

² National Park Service, Technical Preservation Services: Rehabilitation Standards and Guidelines, electronic resource at <https://www.nps.gov/tps/standards/rehabilitation.htm>, accessed October 20, 2023.

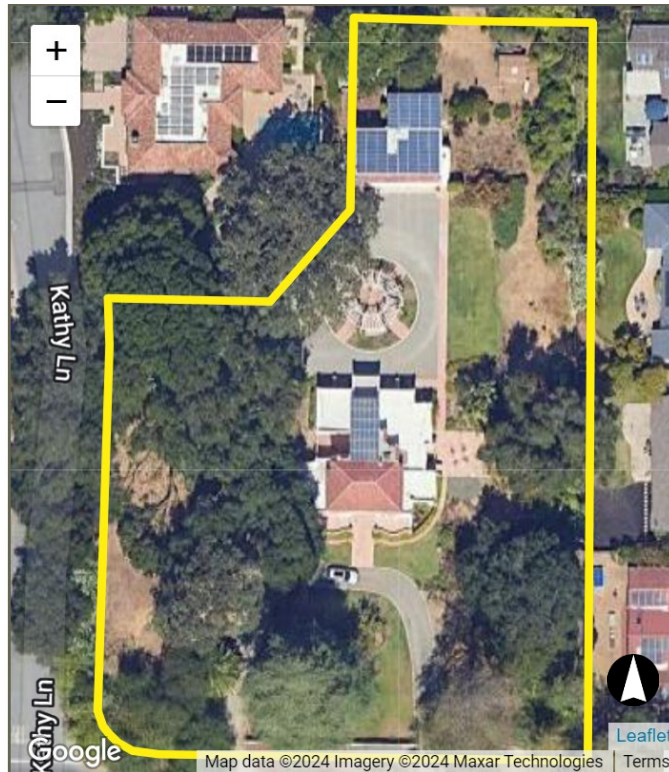


Figure 1: Aerial view of the subject property, the subject parcel outlined in yellow. Santa Clara County Department of Planning and Development Online Property Profile, 2024.



Figure 2. Primary (south) façade of main house, view northwest, 2024.



Figure 3. Side (west, left) and primary (south, right) facades of garage apartment, view northeast, 2024.

HISTORIC STATUS AND CHARACTER-DEFINING FEATURES

National Register of Historic Places

The National Register is the nation's most comprehensive inventory of historic resources. It is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

1485 Fremont Avenue is not listed on the National Register of Historic Places.

California Register of Historical Resources

The California Register is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

1485 Fremont Avenue is not listed on the California Register of Historical Resources.

California Historical Resource Status Codes

Properties listed or under review by the State of California Office of Historic Preservation are listed within the Built Environment Resource Directory (BERD) and are assigned a California Historical Resource Status (CHRIS) Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register or California Register.³ Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual importance. Properties with a Status Code of "6" are not eligible for listing in either register. Finally, a Status Code of "7" means that the resource has not been evaluated for the National Register or the California Register or needs reevaluation.

³ California State Office of Historic Preservation, Built Environment Resource Directory (BERD), Santa Clara County, updated September 2022.

The subject property was evaluated with a Status Code of 5S1 (individually listed or designated locally) on the 2011 DPR form completed by Circa Historic Property Development.⁴ It is listed in the September 23, 2022 version of the BERD database for Santa Clara County with a Status Code of 7N1 (needs to be reevaluated (former status code 4) – may become National Register eligible with restoration or other specific conditions).⁵ Status codes listed in the BERD only represent those evaluations submitted to a CHRIS information center. The BERD does not note when the 7N1 code was established. Therefore, as the property is locally listed, the Status Code of 5S1 (individually listed or designated locally) most accurately reflects its current status.

Los Altos Historical Resource Inventory

The Los Altos historic evaluation process follows the criteria established by State and National evaluation practices.⁶ It requires that listed properties be more than 50 years old, retain sufficient integrity to express the historic attributes of the structure or property, and have historic significance utilizing status codes and national, state, and local criteria.

1485 Fremont Avenue was built in 1927 and is more than 50 years of age.

1485 Fremont Avenue retains integrity of location, design, materials, workmanship, feeling, and association. Its integrity of setting has been diminished by the transition of all surrounding acreage from agricultural to residential use.

1485 Fremont Avenue is designated as Historic Resource #43 on the City of Los Altos Historic Resources Inventory.⁷ DPR 523 forms completed by Circa Historic Property Development in July 2011 state that the residence is an excellent example of the Italian Renaissance style and retains a high degree of integrity of workmanship, feeling, design, and materials. This evaluation focused only on the architectural merit of the property. In 2024, Page & Turnbull prepared updated DPR 523 records which include the associated garage and site design features as contributors to the property's historic significance. Page & Turnbull additionally evaluated the property's significance under criteria for association with important events and persons and found that is not individually eligible for listing in the City of Los Altos Historic Resources Inventory under either criterion. Page &

⁴ Circa Historic Property Development, *1485 Fremont Avenue, Department of Parks and Recreation (DPR) Form 523*, July 2011, 2.

⁵ California State Office of Historic Preservation, *Technical Assistance Bulletin No. 8*.

⁶ "Historic Evaluation Framework," in Overview of the Historic Evaluation Process, City of Los Altos Historic Resources Inventory, Section 1, accessed March 9, 2024, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.losaltosca.gov/sites/default/files/fileattachments/historical_commission/page/36161/hri_section_i_evaluation_methodology.pdf.

⁷ "City of Los Altos Historic Resources Inventory," November 2013, accessed March 1, 2024, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.losaltosca.gov/sites/default/files/fileattachments/historical_commission/page/36161/hri_sec_iv_historic_resources_updated_1-30-17.pdf.

Turnbull confirmed that the resource, inclusive of the house, garage, site design, and informal landscape features, continues to possess sufficient integrity for local designation for its architectural merit.

Character Defining Features

The property at 1485 Fremont Avenue contains a single-family house and garage apartment built in 1927. The site design surrounding the buildings including an expansive front lawn, informally landscaped strips on the east and west sides of the parcel that buffer the buildings from adjacent neighbors, a circular driveway, and a large rectangular rear yard date from the time of construction. The two-story residence, designed in the Italian Renaissance style, is situated at the center of the parcel and set back from Fremont Avenue. The two-story garage apartment is set behind the main house at the northeast corner of the rectangular rear yard, its primary (south) façade facing back to the residence. It is a modest stucco-clad building with decorative turrets and casement windows that complement the architecture of the residence.

Character-defining features of the house include:

- Prominent siting of the house relative to the garage and other site features;
- Two story form, stucco cladding, Spanish clay tile hipped roof with broad eave overhang;
- Recessed front entry porch and large, full-height arched windows across front façade with raised rope and flower elements;
- Arched, multi-pane glazed wood French doors at second story;
- Raised ornamentation at the cornice lines;
Elaborate balustrade at second-story balcony;
- Large lot with extensive grounds and landscaping.⁸

Character-defining features of the garage include:

- Siting behind and subordinate to main house;
- Two story form;
- Flat roof;
- Angled south roof edge with Spanish tile covering;
- Stucco cladding;
- Decorative turrets at southeast and southwest second-floor corners;
- Wood-frame divided-light casement windows front (south) and side (east) façades;
- Wood-frame double-hung windows side (west) and second-story rear (north) façade;
- Double garage door opening front (south) façade.

⁸ Circa Historic Property Development, *1485 Fremont Avenue*, Department of Parks and Recreation (DPR) Form 523, July 2011, 2.

Character-defining features of the site/landscape include:

- Siting of main house at center of parcel with deep setbacks on all sides;
- Expansive front lawn;
- circular front drive;
- Landscape and terrace buffer around front half of main residence;
- Mature trees on west side of parcel and front lawn.

DESCRIPTION OF PROPOSED PROJECT

Previous Changes to the Property Boundary

The proposed project follows multiple previous lot subdivisions at the subject property. The residence and associated site features were constructed in 1927 as a residential compound at the south end of a then twenty-acre fruit orchard. The house and orchard were owned and operated by the same family from 1927 through 1957 when the original owner sold all but 1.87-acres to a developer to build tract housing. Around 1997, the second owner subdivided the 1.87 acres into three separate parcels. Around 2001, a new house was built on the northeast parcel with address 1555 Kathy Lane. In 2007, two of the previously subdivided parcels were merged to create the current boundary of 1485 Fremont Avenue, currently referred to as Parcel A. Subsequently, the owners of 1555 Kathy Lane, currently referred to as Parcel B, purchased the center and northeastern portions of Parcel A (**Figure 4**).

Proposed Project

The proposed project would subdivide the current 1.5-acre Parcel A into two parcels to create Lot 2, a flag lot at the northeast side of the holding (**Figure 5**). The 1927 two-story garage, now sited at the northeast side of the rectangular rear yard behind the main residence, would be relocated to the east side of the property adjacent to the main residence on Lot 1. The front façade of the garage would be set 25'-10¼" behind (north of) the front façade plane of the main house; its rear facade would be set ten feet south of the new Lot 2 lot line. The garage would retain its existing orientation (**Figure 6**). A new driveway spur would be built from the northeast side of the circular driveway to the front of the garage. Like the main drive, this area would be surfaced with gravel. The rectangular yard behind the main house would be demolished to become part of the driveway and approach into to the flag lot. The driveway connector on the west side of the main residence between the circular driveway and the rear yard would be removed.

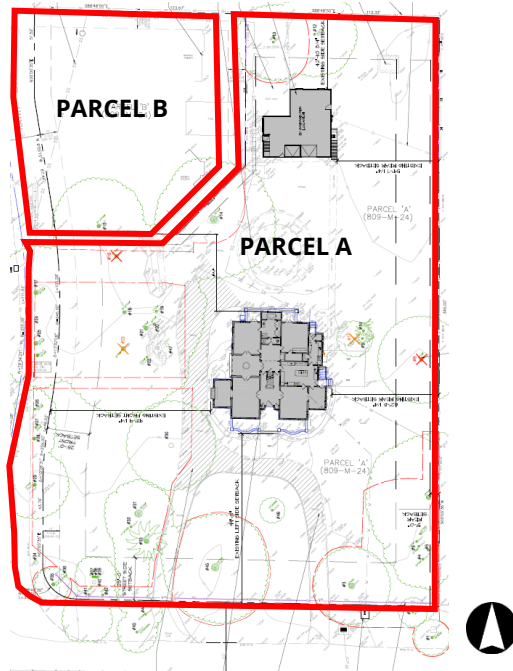


Figure 4. Existing Site Plan. Source: Young and Borlik Architects, CAF Tentative Tract Map, Sheet A0.4, Jun 25, 2024.

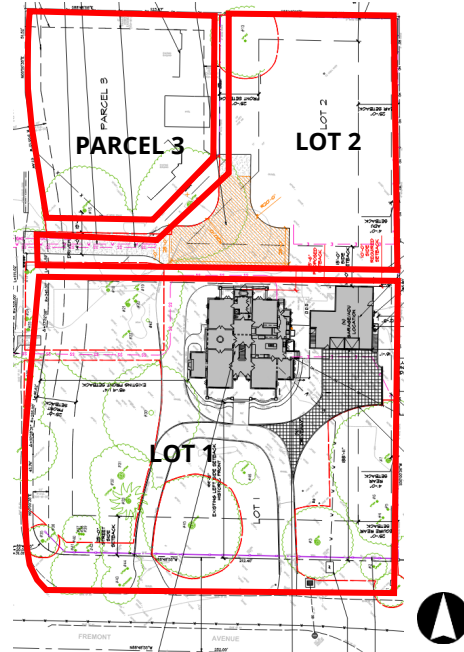


Figure 5. Proposed Site Plan for Two Parcels. Source: Young and Borlik Architects, CAF Tentative Tract Map, Sheet A0.5, June 25, 2024.



Figure 6. South And West Facades, View Northeast From Kathy Lane. Source: Young and Borlik Architects, CAF Tentative Tract Map, Sheet A6.0, June 25, 2024.

SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

The *Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings* (the Standards) provide guidance for reviewing proposed work on historic properties, with the stated goal of making possible "a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."⁹ The Standards are used by federal agencies in evaluating work on historic properties. The Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Projects that do not comply with the Standards may cause either a substantial or less-than-substantial adverse change in the significance of a historic resource.

The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four treatments are summarized as follows:

⁹ Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed April 11, 2018, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

Preservation: The Standards for Preservation “require retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.”

Rehabilitation: The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character.”

Restoration: The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

Reconstruction: The Standards for Reconstruction “establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”¹⁰

Typically, one set of standards is chosen for a project based on the project scope. For the purposes of the proposed project at 1485 Fremont Avenue, the SOI Standards for Rehabilitation are appropriate for the proposed project’s scope.

SOI Standards for Rehabilitation Analysis

Rehabilitation Standard 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.*

Discussion: The proposed project will reduce the size of the parcel occupied by the historic residence by dividing the current parcel into two lots. The center and northeastern portion of the existing Parcel A would become a flag lot for new construction, Lot 2, and the south portion of the existing Parcel A would become Lot 1. The project would relocate the historic garage currently located in this northeast quadrant to a site on the east side of the main residence, consolidating the historic buildings on Lot 1. While these changes will change spatial relationships on the property, it will continue to serve a residential multi-family use.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 1.

¹⁰ Anne E. Grimmer, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed September 7, 2023, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

Rehabilitation Standard 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.*

Discussion: Despite splitting the current Parcel A into two new lots, the proposed project retains the main house and the garage, which both contribute to the significance and character of the historic property. Although moving the garage to a smaller subdivided lot to remain with the main house would adjust the original spatial relationships in the compound, it would maintain the primary relationships between the main house and the garage, as well as the main house and the expansive front yard.

The relocation would preserve the hierarchy of buildings on the site in which the garage is a subordinate support building to its rear. Further, the relocation would retain the foreground siting of the main residence at the center of the parcel, where it is the focal point of the site and its most prominent feature, approached by a long circular drive and set back from neighboring properties. With the recessed garage, the main house would continue to convey its status as a the most important building on the property.

1485 Fremont Avenue is also characterized by its spacious site. While the project would increase density on the new Lot 1, the proposed garage location, set back near the new rear lot line, would minimize the visual impact on this expansiveness when viewed from Fremont Avenue and Kathy Lane. The larger extant tree specimens surrounding the newly relocated garage would remain in place, further buffering views of the garage from the south and east.

The proposed project would reduce the size of the rectangular rear yard, decreasing the spatial buffer at the rear of the residence. However, the change would continue the area's traditional use for auto circulation occurring behind the main residence out of public view. The proposed lot split would remove the driveway spur from the west side of the main residence, altering an area of secondary auto circulation. The newly relocated garage would place car parking and storage for the main house at the rear east side of the new Lot 1. Despite this, the circular driveway would retain its overall character and continue to be visible from Fremont Avenue as the primary circulation element on the front of the property.

As proposed, the project reinforces the subordinate relationship of the garage to the main residence, retains the primary circulation patterns on the site, and conserves the overall sense of spaciousness as viewed from the public right of way.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 2.

Rehabilitation Standard 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.*

Discussion: Relocating the historic garage does not introduce any conjectural features or elements from other historic properties, as the garage is an existing contributing feature of the historic property. Moving it to a different location on the property does not change the understanding of the two buildings' period of significance or uses.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

Discussion: The period of significance for 1485 Fremont Avenue is 1927, the year construction was completed. No alterations dating outside the period of significance have acquired significance in their own right.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 4.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Discussion: As proposed, the project would preserve the distinctive features, finishes, construction techniques, and examples of craftsmanship that characterize 1485 Fremont Avenue as a historic property. The historic materials of the house and garage which convey the techniques and craftsmanship of their construction, including the stucco cladding, partial Spanish clay tile roof, raised ornamentation at the cornice lines, decorative turrets, an elaborate balustrade at the second story house balcony, divided-light casement windows, wood frame sash windows, and double garage door opening would be retained.

Therefore, as planned the proposed project complies with Rehabilitation Standard 5.

Rehabilitation Standard 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.*

Discussion: The project does not propose to repair or replace deteriorating features.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 6.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Discussion: Chemical or physical treatments are not proposed as part of the project. If such treatment is determined to be necessary as part of the proposed project, it would be undertaken using the gentlest means possible.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 7.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Discussion: The proposed project would require ground disturbance to prepare the site for relocation of the garage and construction of the driveway spur. If any buried archaeological materials or deposits are encountered during ground-disturbing project activity, work should be halted immediately at the location of the discovery. The City of Los Altos should be informed, and a qualified archaeologist should be retained to identify and evaluate the archaeological materials and recommend appropriate measures for protection and/or treatment of the resource.

If these standard procedures are followed, the proposed project would comply with Rehabilitation Standard 8.

Rehabilitation Standard 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 will 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.*

Discussion: The proposed project would not introduce new construction, exterior alterations, or additions to the historic buildings at 1485 Fremont Avenue. As discussed with respect to Standard 2, relocating the garage to a position adjacent to but separate and set back from the primary façade of the residence allows the main building to retain its prominence as the focal point of the spacious site, particularly as seen from the public rights-of-way. Further, siting the garage near the rear of the proposed Lot 1 reinforces the secondary role of the garage as a support building.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 9.

Rehabilitation Standard 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.*

Discussion: If the relocated garage were, in the future, returned to its original site and the proposed driveway spur between the circular drive and garage removed, the property at 1485 Fremont Avenue would retain its essential form and integrity.

Therefore, as planned, the proposed project complies with Rehabilitation Standard 10.

Summary of Rehabilitation Standards Analysis

As the above analysis demonstrates, the proposed project as currently designed would comply with all of the ten *Secretary of the Interior's Standards for Rehabilitation*. The relocation of the garage to a site at the east side of the main residence with the front facade of the garage set back behind that of the main residence would differentiate the form and use of the two buildings. Further, it would reinforce the character-defining prominence of the main house, the subordinate function and status of the garage, and the spaciousness of the site.

CONCLUSION

1485 Fremont Avenue is designated as Historic Resource #43 on the City of Los Altos Historic Resources Inventory. The proposed split of the current lot into two parcels, changes to the rear yard, and alteration of auto circulation at the rear of the site and at the northeast side of the circular drive would not negatively impact the historic integrity of the site. Relocating the garage, as proposed, would not alter the character defining architectural features of the house or garage. Relocation of the garage maintain the primary spatial hierarchy between the house and garage and between the house and the site as viewed from the public right of way. Therefore, the proposed project would comply with all 10 of the Secretary of the Interior's Standards for Rehabilitation.

It is Page & Turnbull's opinion that the proposed alterations would not impact the integrity of the site to the extent that its eligibility for listing on the Los Altos Historical Resource Inventory would be lost. The proposed project would therefore not be anticipated to cause a substantial adverse change to a historical resource for the purposes of review under the California Environmental Quality Act (CEQA).