



# EVANS & DE SHAZO

ARCHAEOLOGY HISTORIC PRESERVATION

**A SECRETARY OF THE INTERIOR'S STANDARDS  
FOR THE TREATMENT OF HISTORIC PROPERTIES  
REVIEW FOR THE PROJECT AT 236 ELEANOR  
AVENUE, LOS ALTOS, SANTA CLARA COUNTY,  
CALIFORNIA**

**SUBMITTED TO:**

Jennifer Jacobson and Todd Parmacek

**SUBMITTED BY:**

Stacey De Shazo, M.A.  
Principal Architectural Historian  
and  
Nicole Wyton, M.S., Architectural Historian

**September 4, 2024  
(Updated November 7, 2024)**

Evans & De Shazo, Inc  
1141 Gravenstein Highway South,  
Sebastopol, CA 95472  
707-823-7400  
[www.evans-deshazo.com](http://www.evans-deshazo.com)



---

## TABLE OF CONTENTS

<b>INTRODUCTION .....</b>	<b>1</b>
<b>PREVIOUS DOCUMENTATION.....</b>	<b>1</b>
<b>PROPERTY LOCATION .....</b>	<b>1</b>
<b>REGULATORY SETTING .....</b>	<b>3</b>
CALIFORNIA ENVIRONMENTAL QUALITY ACT .....	3
STANDARDS REVIEW .....	4
<b>METHODS.....</b>	<b>5</b>
<b>STANDARDS REVIEW .....</b>	<b>5</b>
<b>CONCLUSION.....</b>	<b>12</b>
<b>BIBLIOGRAPHY .....</b>	<b>13</b>

### Appendix A: Updated Plans



## INTRODUCTION

Evans & De Shazo, Inc. (EDS) completed a Secretary of Interior's Standards for the Treatment of Historic Properties (Standards) review (36 CFR Part 67) due to additional changes for the project at 236 Eleanor Avenue, Los Altos, Santa Clara County, California, within the 0.42-acre Assessor's Parcel Number (APN) 170-41-093 (Property). The Property currently consists of the 1914 "C.W. Morris" house (1914 house) and landscape. The 1914 house within the Property is currently listed on the Office of Historic Preservation (OHP) Built Environment Resources Directory (BERD; P-43-002058)<sup>1</sup> and the City of Los Altos Historic Inventory (2012);<sup>2</sup> therefore, the 1914 house is considered a Historical Resource as defined in Section (§) 15064.5 of the California Code of Regulations (CCR). EDS completed the following Standards review in compliance with the City of Los Altos Mills Act application.

The Standards Review follows the Standards for Rehabilitation. It was completed by EDS Principal Architectural Historian Stacey De Shazo, M.A., and Architectural Historian Nicole Wyton, M.S., who both exceed the Secretary of Interior's qualification standards in Architectural History and History. The results of the Standards review are presented herein.

## PREVIOUS DOCUMENTATION

In 2011, the 1914 "C.W. Morris" house within the Property was part of a city-wide historic inventory update. In 2012, the 1914 house was listed on the local City of Los Altos Historic Inventory (S-34502). Due to its current listing, the 1914 house is considered a Historical Resource as defined in §15064.5 of the California Environment Quality Act (CEQA) Guidelines; however, the 2012 documentation only evaluates the 1914 house under CRHR Criterion 3 (Architecture) and does not include an evaluation under criteria 1, 2 or 4. Furthermore, the documentation does not include the ca. 1935 detached garage (no longer extant) or landscape.<sup>3</sup>

In 2023, Urban Programmers completed a Standards review for the Project, relying on previous documentation to assess impacts to historical resources. However, after the Project was approved, EDS recommended additional changes in consultation with the Project designer to meet the Standards further. Therefore, EDS completed a second Standards review based to ensure the Project's compliance.

## PROPERTY LOCATION

The Property is located at 236 Eleanor Avenue, Los Altos, Santa Clara County, California, within APN 170-41-093 (Figure 1). The 0.42-acre Property is on the east side of Eleanor Avenue, approximately 166 feet west of Eleanor Avenue, and approximately 2.1 miles east of South San Antonio Road in the City of Los Altos.

---

<sup>1</sup> P-43-002058 includes documentation completed in 1991 and 1997. In 2011, Circa: Historic Property Development documented the property as part of an updated City of Los Altos Historic Inventory, resulting in the 1914 house being locally listed in 2012. The 2011 documentation was not submitted to the Northwest Information Center (NWIC) and is not part of the P-43-002058 record.

<sup>2</sup> Los Altos Historic Resources Inventory Update Report (Circa: Historic Property Development, March 2012).

<sup>3</sup> In 2024, before the HRE was completed, and based on the findings in the 2023 Standards review by Urban Programmers, a permit was issued for the Project, and the ca. 1935 detached garage was demolished.



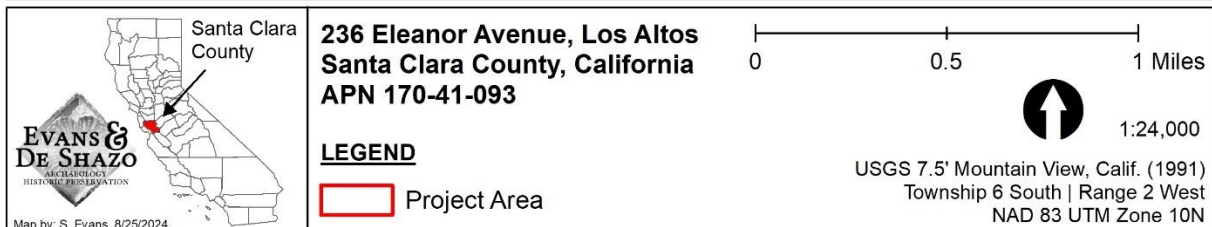
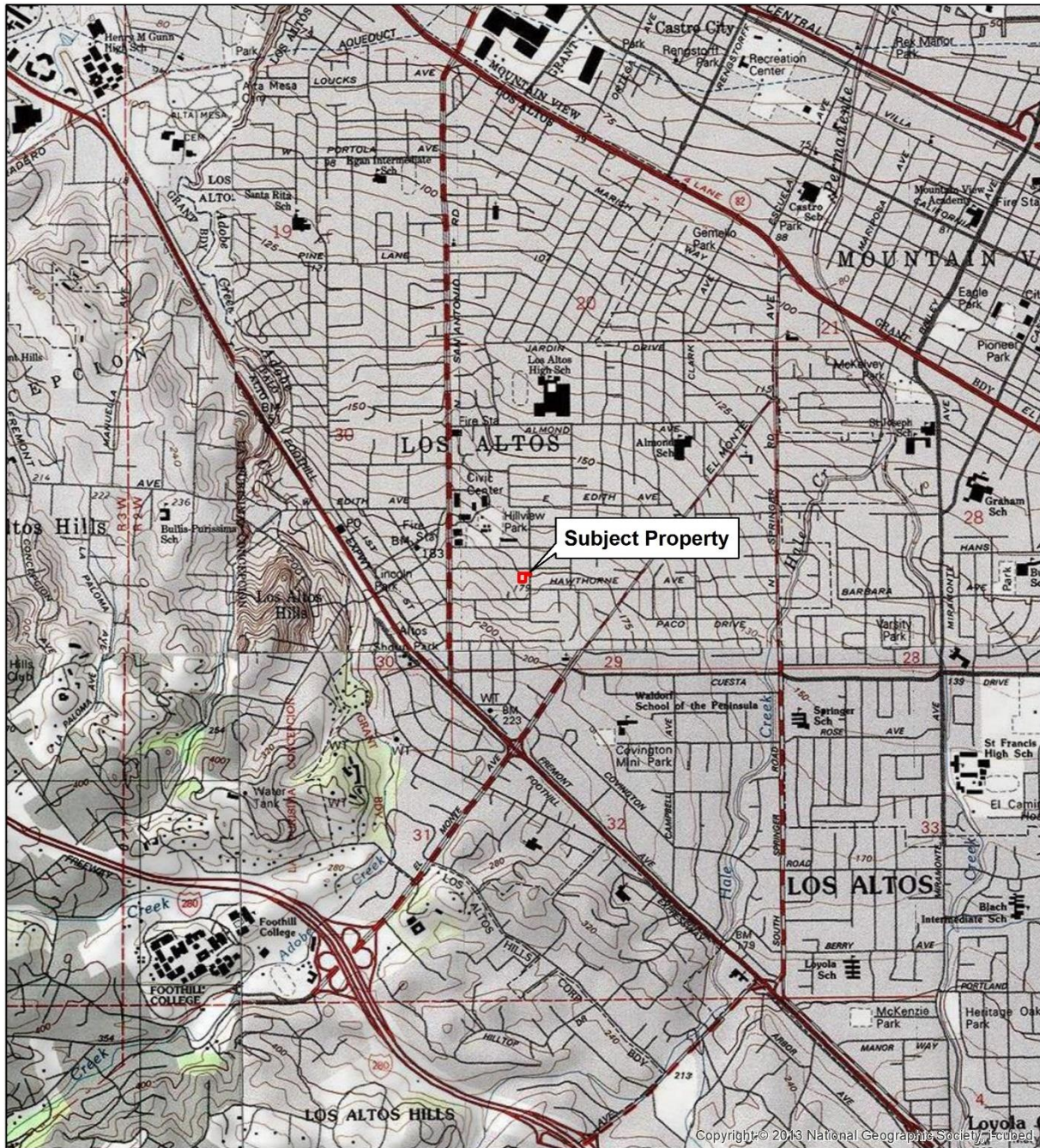


Figure 1. Location Map





## REGULATORY SETTING

The CEQA regulations pertain to cultural resources and the National Park Service (NPS) Standards guidelines are outlined below.

### CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA and the Guidelines for Implementing CEQA (State CEQA Guidelines § 15064.5) give direction and guidance for evaluating properties and preparing Initial Studies, Categorical Exemptions, Negative Declarations, and Environmental Impact Reports. Under California State law, the City of Los Altos is legally responsible and accountable for determining the environmental impact of any land use proposal it approves. Cultural resources are aspects of the environment that require identification and assessment for potential significance under CEQA (14 CCR § 15064.5 and PRC § 21084.1).

There are five classes of cultural resources defined by the State OHP. These are:

- **Building:** A structure created principally to shelter or assist in carrying out any form of human activity. A “building” may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.
- **Structure:** A construction made for a functional purpose rather than creating human shelter. Examples include mines, bridges, and tunnels.
- **Object:** Construction is primarily artistic in nature or relatively small in scale and simply constructed. It may be movable by nature or design or made for a specific setting or environment. Objects should be in a setting appropriate to their significant historic use or character. Examples include fountains, monuments, maritime resources, sculptures, and boundary markers.
- **Site:** The location of a significant event. A prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing building, structure, or object. A site need not be marked by physical remains if it is the location of a prehistoric or historic event and if no buildings, structures, or objects marked it at that time. Examples include trails, designed landscapes, battlefields, habitation sites, Native American ceremonial areas, petroglyphs, and pictographs.
- **Historic District:** Unified geographic entities which contain a concentration of historic buildings, structures, or sites united historically, culturally, or architecturally.

According to CCR § 15064.5, cultural resources are historically significant if they are:

- (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 (PRC §5024.1, 14 CCR § 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in PRC § 5020.1(k) or identified as significant in a historical resource survey meeting the requirements PRC § 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of the 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 a 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 on the California Register of Historical Resources (PRC § 5024.1, 14 CCR § 4852), including the following:
  - (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.
- (4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources pursuant to PRC § 5020.1(k), or identified in a historical resources survey meeting the criteria in PRC § 5024.1(g) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC § 5020.1(j) or § 5024.1.

## STANDARDS REVIEW

### The Secretary of the Interior's Standards for Rehabilitation

The Standards for Rehabilitation provides directions for making appropriate choices in planning the repairs, alterations, and additions that may be part of a rehabilitation project. The Guidelines apply the Standards and describe specific treatments that do and do not meet the Standards. The Standards for Rehabilitation, [codified in 36 CFR Part 67](#), are regulatory for the Historic Preservation Tax Incentives program and are the Standards most often used by local historic district commissions nationwide.

The Standards for Rehabilitation are the criteria for determining if a rehabilitation project qualifies as a certified rehabilitation. The intent of the Standards is to assist in 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, construction types, sizes, and occupancy and encompass the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction. To be certified, a rehabilitation project must be determined by the Secretary to be consistent with the historic character of the structure(s) and, where applicable, the district in which it is located. The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, [taking into consideration economic and technical feasibility](#).

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.



2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall 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.

## METHODS

The methods used to complete the Standards review included a review of the Project's architectural, engineering, and landscape plans and details provided by the Property owners. Ms. De Shazo, M.A. and Ms. Wyton, M.S. completed the Standards review, working directly with the architect and owners to identify and address potential adverse impacts on the 1914 house to ensure the current Project complies with the Standards for Rehabilitation, which is required to apply for the Mills Act.

## STANDARDS REVIEW

The 1914 house is currently listed on the City of Los Altos Historic Inventory (2012);<sup>4</sup> as such, the 1914 house is considered a Historical Resource. Due to several changes to improve the preservation and rehabilitation of the house – recommended after the original permit was issued, EDS completed a “new” Standards review to

---

<sup>4</sup> Los Altos Historic Resources Inventory Update Report (Circa: Historic Property Development, March 2012).



ensure the Project meets the Standards. The EDS team worked with the Project's architectural and design team at Chapman Design Associates; and utilizing the findings in the HRE, EDS recommended changes to the Project. The review of the updated drawing set by Chapman Design Associates (10/17/2024; Attachment B) is detailed in the section below.

### **Secretary of Interior Standards for Rehabilitation Review**

The following section addresses the current Project within the context of the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values. When repair and replacement of deteriorated features are necessary, when alterations or additions to the property are planned for a new or continued use, and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment.

According to the Standards, "some exterior and interior alterations to a historic building are generally needed as part of a Rehabilitation project to ensure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes. Alterations may include changes to the site or setting, such as the selective removal of buildings or other features of the building site or setting that are intrusive, not character-defining or outside the building's period of significance."

The Standards and EDS' analysis of the current preliminary Project related to the Standards is presented below. The Project was reviewed using the Project description provided by the architect, which was applied to each of the Standards. The results of the Standards analysis are presented below with an "EDS Response" and an "EDS Analysis" that identifies whether the Project conforms with Standards. "EDS Recommendations" are also provided, if warranted.

The following Standards review assesses potential impacts on the locally listed 1914 house. The following Standards review amends the 2023 Standards review completed by Urban Programmers, and the term Project refers to the updated drawing set by Chapman Design Associates (10/17/2024).

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**

The 1914 house will continue to be for residential use.

*EDS Analysis: The current preliminary Project complies with Standard 1.*

- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**

Based on the drawing set completed by Chapman Design Associates (10/17/2024), the Project includes a rear addition along the west elevation and a portion of the north and south elevations of the 1914 house. Due to the renovations in 1994 (Permit #1994-626945) that removed original materials on the west elevation, including original wood windows, exterior wood siding, and an original wood door, no character-defining features or historical materials will be removed on this





elevation for the current Project. However, the changes along portions of the north and south elevations will remove less than 5% of the original stucco siding and wood windows. As such, to address these potential impacts on original materials and windows, the following assessment is provided.

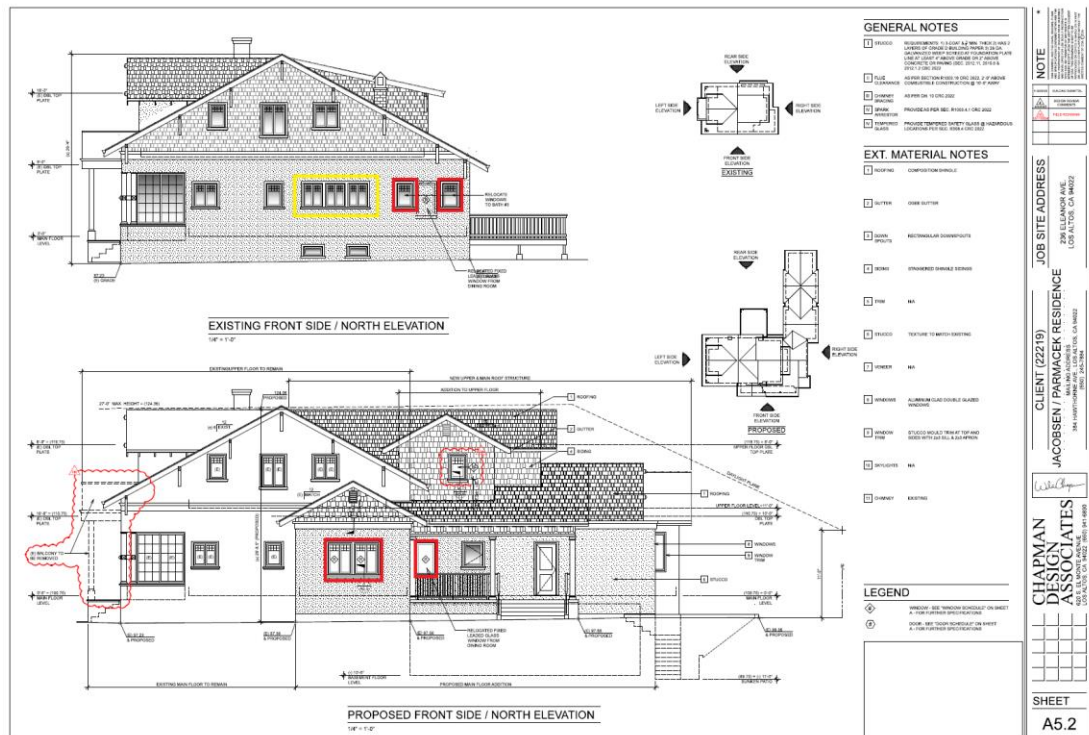
### **Stucco Removal**

The 1914 house is clad in a combination of stucco and shingles, a common material combination found on Craftsman houses. While this combination was the most common, Craftsman design also included stucco exterior cladding. Currently, the 1914 house retains the original exterior stucco from the date of construction, which is a character-defining feature of the house. The Project proposes to retain 90% of the original stucco and remove approximately 10% of the stucco on the northwestern-most sections of the north elevation and the southwestern-most section of the south elevation. Although a portion of this material will be removed, enough of the original stucco material will be retained. In addition, if additional stucco is determined to be beyond repair during the rehabilitation or any exploratory work due to termite damage, dry rot, and deterioration requiring additional removal, a qualified architectural historian should be consulted before removal.

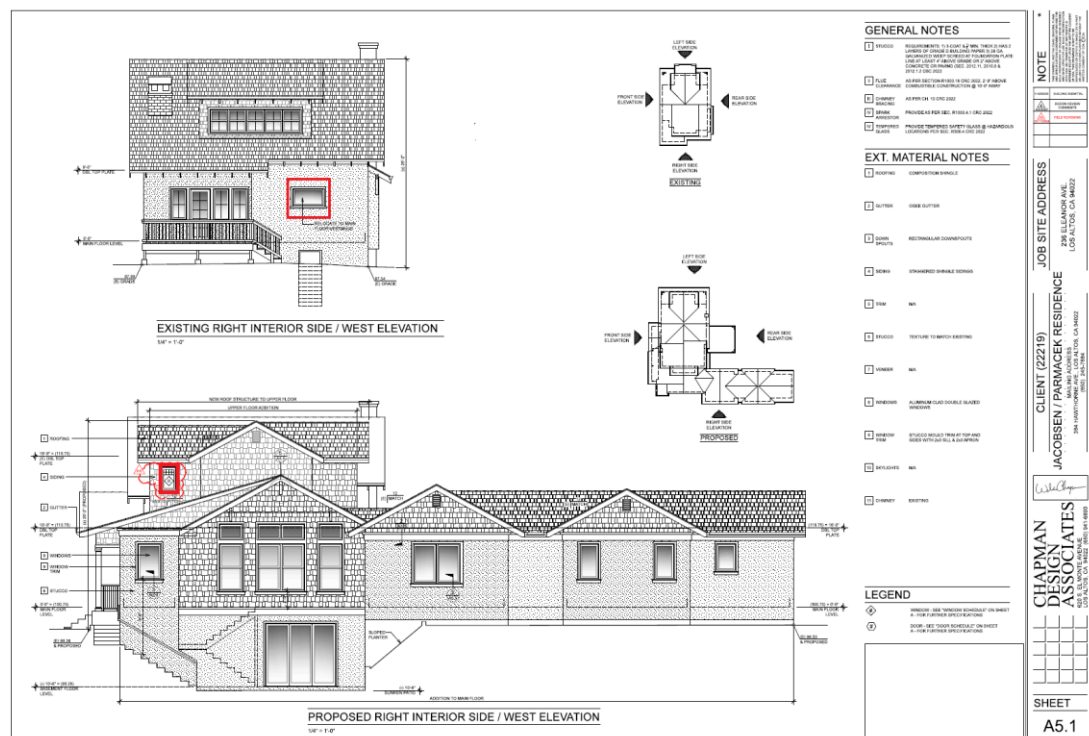
### **Windows - Removal and Reuse**

There are currently thirty-nine windows on the 1914 house. Twenty-two of these windows are original casement windows with a “valance-style” grid pattern consisting of eight-over-one glazing, three are original fixed windows with “valance-style” grids, one is an original fixed wood window with leading, and one is an original sliding wood window with two fifteen-light sashes. The new windows consist of three low-placed hopper windows, a ribbon of five, two-over-two, double-hung wood windows, and four four-light fixed wood windows. The Project consists of removing nine casement windows and replacing a fixed leaded window. The plan is to relocate six casement windows and the fixed window with leading. The relocated windows are enclosed in red, while the windows that are being removed without relocation are in yellow (Figure 2, Figure 3, and Figure 4). The proposed location of these windows does not promote a false sense of history and allows the retention of historic materials and character-defining features.

Overall, the Project retains approximately 90% of the original exterior stucco cladding on the north, south, and east elevations. It will also retain thirty (30) of the wood windows in their original locations and six original wood windows in appropriate locations within the 1914 house.



**Figure 2. Sheet A5.2 shows the original windows that will be relocated and their proposed locations (Chapman Design Associates, 10/17/2024).**



**Figure 3. Sheet A5.1 shows the original windows that will be relocated and their proposed locations (Chapman Design Associates, 10/17/2024).**

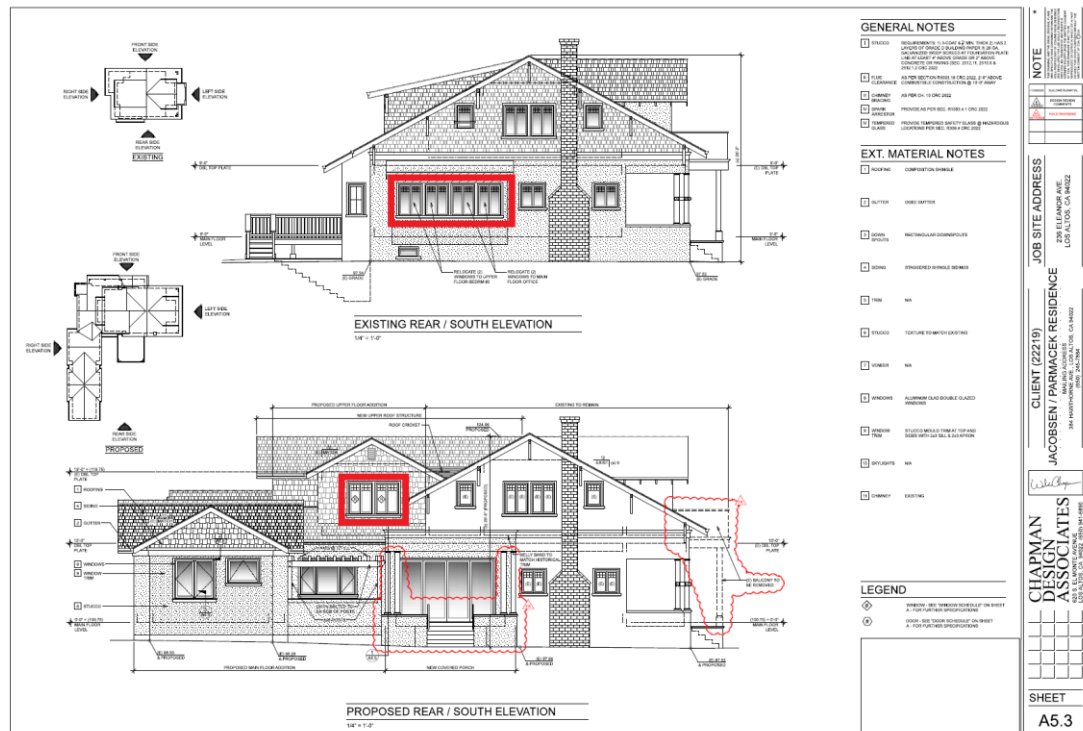


Figure 4. Sheet A5.3 shows the original windows that will be relocated and their proposed locations (Chapman Design Associates, 10/17/2024).

*EDS Analysis: The Project complies with Standard 2. However, a professional architectural historian should be consulted if additional original exterior stucco is removed.*

- Each property shall 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 architectural elements from other buildings, shall not be undertaken.

There are no proposed changes to the 1914 house that would create a false sense of history.

*EDS Analysis: The Project complies with Standard 3.*

- Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

There are no proposed changes to the 1914 house that have become “significant in their own right.”

*EDS Analysis: The Project complies with Standard 4.*

- Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

The Project proposes to preserve much of the original 1914 Craftsman design and features that are examples of craftsmanship that characterize the Craftsman design of the house, including retaining the character-defining wood casement windows with “valance-style” grids, front wood door, the incorporated porch with paired wood columns, the exterior brick chimney, the decorative wood “bellyband” along the north, south, and east elevations of the house, the decorative brackets, the



stucco finish, and shingles siding with the side gables. The Project does not create a false sense of history but instead ensures the preservation of historic materials that are distinctive elements of the house. Although the Project will remove a projecting bay window on the north elevation and alter a portion of the side-facing gable form on the southwest corner, giving that corner a “saltbox” feel, these changes occur on the secondary elevations. Furthermore, **the Project will return the primary elevation to its initial Craftsman design by removing the second-story balcony, added in the 1990s, and restoring the original primary façade** (east elevation).

*EDS Analysis: The Project complies with Standard 5.*

6. **Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**

There are no proposed changes to deteriorated features.

*EDS Analysis: As such, Standard 6 does not appear to apply.*

7. **Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**

*EDS Analysis: Not applicable to the Project.*

8. **Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**

*EDS Analysis: Not applicable, as a professional archaeologist would need to make this determination.*

9. **New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**

The new exterior addition to the 1914 house requires the removal of a small section of the original form at the northwest and southwest sections of the north and south elevations – allowing for the new addition; the removal of the west elevation – removing materials from a 1994 renovation; the removal of a shed dormer; and the projecting bay window of the south elevation. The new addition includes the construction of a new side-facing gable section with an incorporated porch on the south elevation, a rear-facing gable within the extant side-facing gable roof, a one-story addition that extends from the west elevation and continues south, creating an “L” shaped footprint and a one-story portico replacing the projecting bay window. The rehabilitation will also include removing the 1990s second-story balcony over the original porch and restoring the original primary façade.

#### **Exterior Alteration: Side-Gable Form**

The Project will remove a small portion of the original side-gable form at the northwest and southwest sections of the side-gable eaves, altering the side-facing gable form. While removing these sections



does not follow the Craftsman form, it occurs on secondary elevations, which are set away from the original primary façade. In addition, these sections had previously undergone some alterations when the west elevation was altered in 1994.

### Updates since the Project was Approved

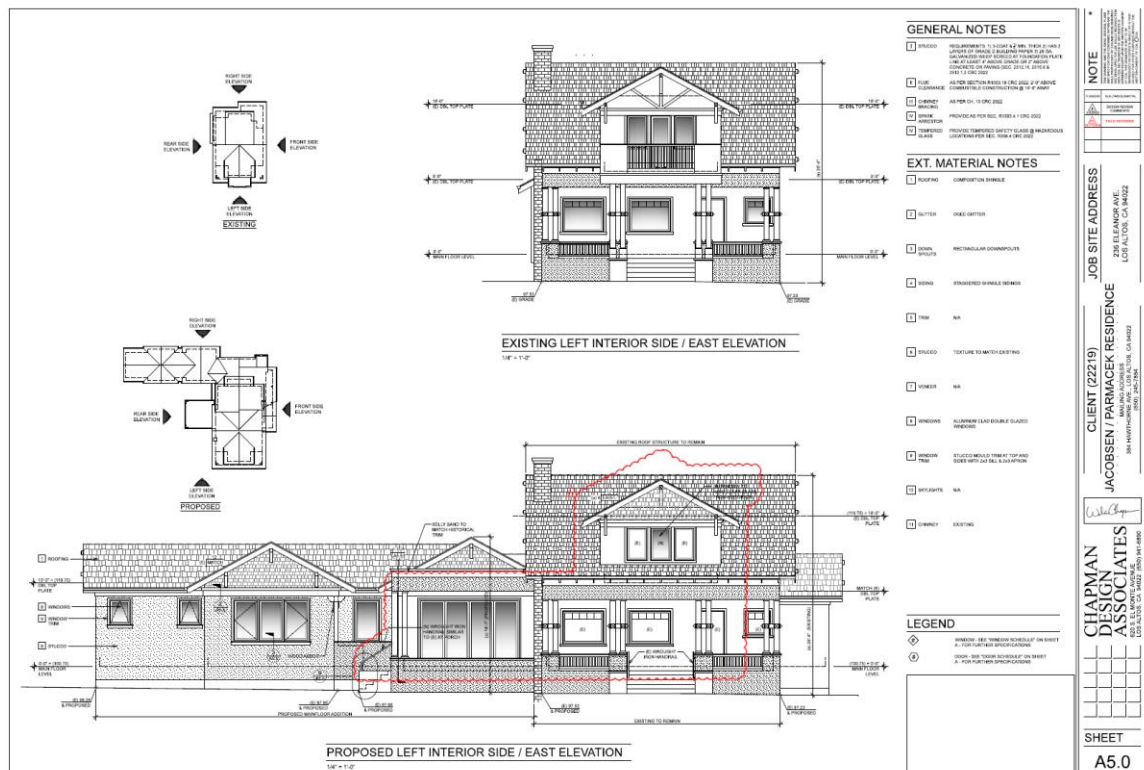
### Rehabilitation: Covered Terrace

The proposed covered terrace on the north elevation consists of a raised concrete deck with a stucco-finished railing and a thick roof supported by two clusters of three small columns on each exterior corner. The flat roof continues the trim of the house's "bellyband," providing design continuity while maintaining a distinction between the 1914 house and the proposed addition. This covered terrace does not overwhelm the design of the 1914 house and is compatible in size, massing, and design.

**Retain and Reuse of Historic Windows:** EDS recommended retaining several of the wood windows that would have been removed. The windows will be retained in situ or relocated within the 1914 house rather than removed.

### Restoration: Second-story balcony on East Elevation (Primary Façade)

The second-story balcony of the 1914 house consists of a stucco-finished balcony with a central wood baluster. Two pairs of wood columns replicating the incorporated porch support the balcony. In the 1990s, these columns replaced two double wood brackets. As such, the second-story balcony is not historic and detracts from the original 1914 craftsman form. The door to the balcony will be replaced with a wood casement window (Figure 5). Removing this balcony restores the primary façade to its original 1914 Craftsman form, and removing the 1990s balcony restores the original design.





**Figure 5. Sheet A5.0 shows the proposed removal of the balcony and the new fenestration (Chapman Design Associates, 10/17/2024).**

*EDS Analysis: The current Project designs, including changes to the primary façade balcony, fenestration, and decorative details were altered to meet the Standards further and retain or restore the house's character-defining features, including the side-facing gable form, wood windows, brackets within the gables, brick exterior chimney, and stucco finish.*

*Following recommendations by EDS, the new design by Chapman Design Associates (10/17/2024) includes retaining additional wood windows that will be relocated within the 1914 house rather than removing them and altering the design of the new second-story balcony addition on the south elevation – removing and the bulkier forms of the additions and creating a more compatible massing, size, scale and features. Removing this balcony restores the primary façade to its original 1914 Craftsman form, and removing the 1990s balcony restores the original design.*

*The Project complies with Standard 9.*

- 10. New additions and adjacent or related new construction shall 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.**

The Project proposes an addition that extends south from the west elevation of the 1914 house, impacting a section of the north and south elevations. It also includes a new detached garage, which will be constructed north of the north elevation of the house. The addition and new detached garage were part of the original approved Project, and no additional changes were made as part of this Standards review.

*As such, the Project complies with Standard 10.*

## CONCLUSION

EDS completed a Standards review to address the additional changes to the 1914 house to determine if the Project would impact the integrity of the 1914 house, which is currently locally listed. For the Standards review, EDS reviewed drawings completed by Chapman Design Associates (10/17/2024) addressing changes, including the restoration of the primary façade (east elevation), the retention of or relocation of original windows, and updates to the covered terrace to better meet the Standards. EDS has determined that the Project meets the Standards for Rehabilitation and will not impact the integrity of the 1914 house; therefore, the 1914 house will remain eligible for local listing and the Mills Act tax program.



## BIBLIOGRAPHY

Bamburg, Bonnie, "236 Eleanor Avenue, Los Altos," Urban Programmers 2023

De Shazo, Stacey et. al., "Historic Resource Evaluation and Standards Review of the Property at 236 Eleanor Avenue, Los Altos, Santa Clara County, California," Evans & De Shazo, Inc. 2024.

Los Altos Historic Resources Inventory Update Report (Circa: Historic Property Development, March 2012).

Office of Historic Preservation, "Historic Resource Surveys," (accessed 8/12/2024),  
[https://ohp.parks.ca.gov/?page\\_id=23317](https://ohp.parks.ca.gov/?page_id=23317).



## **Appendix A:**

### **Updated Plans**