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MEMORANDUM

Date: September 22, 2023

To: Mike Giovannotto
604 Milverton Road
Los Altos, CA 94022

From: Kathleen McDonald, Conditions Assessment Specialist/ Architectural Historian

Project: 604 Milverton Road, Los Altos, CA
GA Job #2022011

Re: Standards Compliance Review - 604 Milverton Road - New Single-Family Home

Via: mikegiovannotto@gmail.com

Dear Mr. Giovannotto,

You contacted Garavaglia Architecture, Inc. (GA) to provide preservation consulting services for a Secretary of the Interior's Standards (SOIS) Compliance Review for the property located at 604 Milverton Road in Los Altos, CA. This report is part of a design review application for a new two-story single-family house and the conversion of an existing non-conforming single-family house into an accessory structure. Because the property is listed on the City of Los Altos Historic Resource Inventory, and is considered a historic resource under the California Environmental Quality Act (CEQA), review for conformance with the SOIS is required. Proposed project drawings and plans by DG Design, dated June 15, 2023 were provided to GA for review.

In November of 2022, GA finalized a Historic Resource Evaluation (HRE) and an updated Department of Parks and Recreation (DPR) 523 form for the property at 604 Milverton Road, which included the main house and a carport. In the HRE, GA concluded:

In summary, the subject property at 604 Milverton Road, historically called the Costello House, was built in 1916 as a residential farm property does display a level of historical significance and integrity that would qualify it for listing as a historic resource on the National Register of Historic Places, on the California Register of Historical Places, as a local City of Los Altos Landmark at the local level. The Costello House is significant for its architecture, as a fine example of vernacular California Bungalow with a mixture of Craftsman and Arts and Crafts design elements. It is also significant for its association with the overall development pattern of Los Altos and the South Bay region for its transition from a large apricot farming property to single family residential suburban properties.

The HRE also concluded that the Costello House at 604 Milverton Road retains five aspects of integrity – Location, Design, Materials, Workmanship, Feeling, but lacks integrity of Setting and

Innovating Tradition

Association. However, it retains enough overall Historic Integrity remain eligible for the National Register of Historic Places and the California Register of Historic Resources at any level.

PROJECT INFORMATION

The below information has been copied from GA's HRE for the property at 604 Milverton Road, dated November 10, 2022.

Site and Building Description

The subject property of approximately 2 acres has an abstract geometric shape with irregular boundary lines and is located southwest of University Avenue and west of South El Monte Avenue in Los Altos. The street address is 604 Milverton Road (APN No. 175-19-042), but the driveway access is from Morningside Road. The property contains a residential building known as the Costello House.

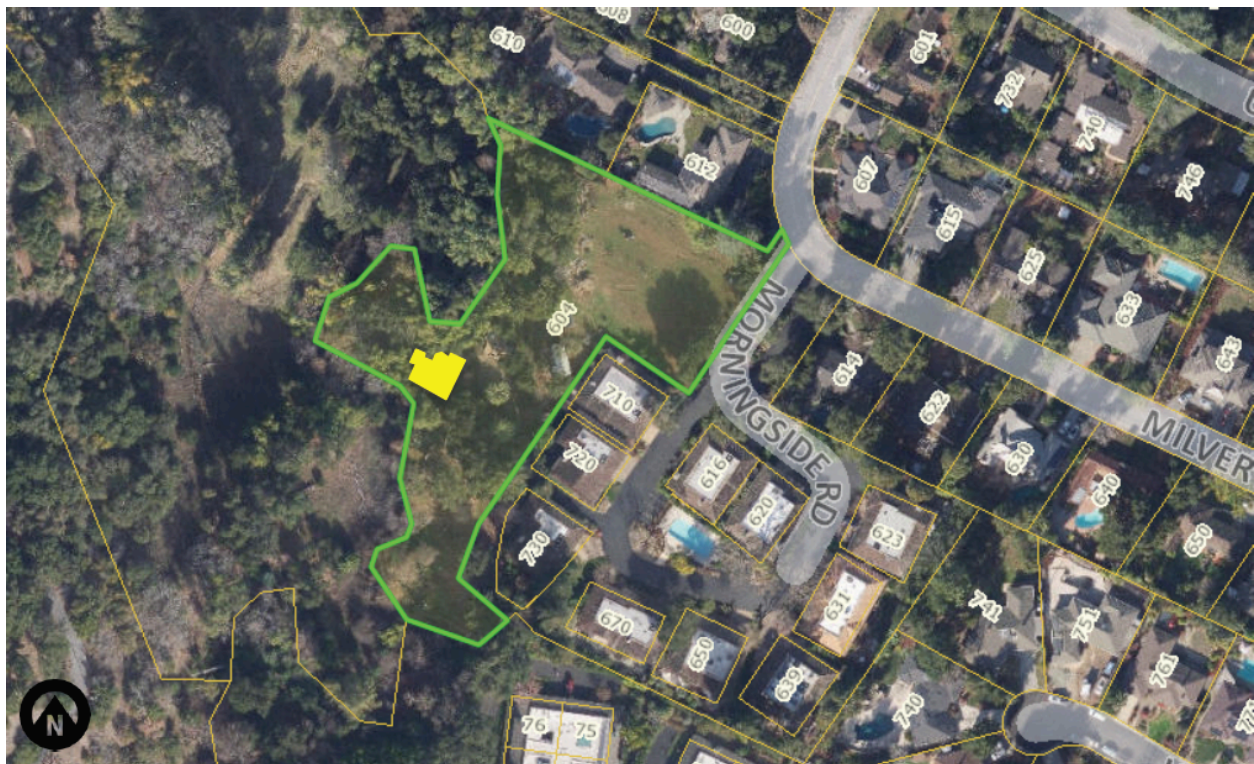


Figure 1. Street map of subject property outlined in green, with Costello House filled in yellow. (Santa Clara County Map, Amended by author.)

South of the Orange/University Historic District was the former Costello agricultural property, including apricot orchards and the Costello Barn, which are historically associated with the Costello House but are not part of this report. The zoning for the current Costello property is unique since it is categorized as a "Planned Community" and will allow only two residential structures on the property, but the lot cannot be subdivided.

There are currently two structures on the property, a house, and a carport. The house and the carport are located near the center of the property, but the house is close to the property lines on the west side and the garage is situated close to the property boundary on the east side. The house is not visible from Morningside Road or from Milverton Road, because it sits below street level, on a grade closer to Adobe Creek. The front facade of the house faces east. The property is

in a mostly wooded area and includes a segment Adobe Creek, to the east of the house. A clearing or small agricultural lot is located on the northeast side of the property. The Los Altos Water Department owns undeveloped land along Adobe Creek to the north and south of the subject property, preserving a rural feeling to the view shed surrounding the house.



Figure 2. Looking southwest at the house from the north corner of the parcel at street level. Both mature and recently planted trees obscure the view of the house. (Garavaglia Architecture, 2022)

The “H” shaped building is a one story, residential wood framed structure constructed in the Craftsman Bungalow architectural style. The house is approximately 1,637 sq. ft. with two bedrooms, and one bathroom. The walls are made of wood clapboard siding painted an ochre color with white trim. Asphalt shingles cover the unique intersecting gable roof forms. The house is built on an elevated foundation and the primary facade faces north.



Figure 3: Looking west at the front facade with apricot carved motif above the front door (Garavaglia Architecture, 2022)



Figure 4: Looking north at the house in the distance, with the creek to the left of the house and the garage to the right. (Garavaglia Architecture, 2022)

Character-Defining Features:

The Costello House was found to be potentially significant under criteria C/3 for Design. As such, individual features of the building have been identified that define the historic character of the building and property. Assessment of various features is done according to a prioritized evaluation system. Once the character-defining features have been identified, each is assigned a priority rating to create a sense of the relative historical importance of these spaces and features. A rating scale of “*Premier-Important-Contributing-Non-Contributing*” is used. In general, this system allows for the analysis of the structure as a whole to guide what types of work should be done, and where such work could be completed with the least damage to the historic integrity of the resource.

The character-defining features of the residence and property, the Costello House at 604 Milverton Road, Los Altos, include:

Premier

- Intersecting gable roof forms
- Center rounded gable flanked by two bowed gables at the front facade
- Original window groupings of three on front facade with multiple lites over one
- French style entry door with sidelites
- Apricot carving on bargeboard

Important

- Open eaves at roof edges
- Wood clapboard siding
- Historic oak trees
- Wooded creek side setting

Contributing

- Long driveway approach to the house
- SCVWD land easement connecting the house property to the Costello barn property

Non-Contributing

- Carport/garage
- Modern wood deck addition on south façade
- Additional sheds and outbuildings on property
- Adjacent homes on Morningside Drive

Project Summary

The project under review proposes a new two-story single-family house and the conversion of an existing non-conforming single-family house into an accessory structure on the property at 604 Milverton Road in Los Altos.

Details about the proposed project include:

- New two-story single-family house
 - 5,414 square feet on the first floor, 2,831 square feet on the second floor, and 4,543 square feet on the basement floor
 - Simplified Mediterranean architectural style
 - Exterior materials finished in earth colors
 - Designed to appear to be a single-story when viewed from Morningside Road
 - Rear is not visible due to wooded areas
- Conversion of existing single-family house into accessory structure
 - Removing the kitchen prior to final occupancy of the new dwelling
 - No exterior modifications

APPLYING THE STANDARDS FOR REHABILITATION TO 604 MILVERTON ROAD

Compliance

The Secretary of the Interior's Standards for Rehabilitation lists 10 key elements to consider when new uses or architectural modifications are undertaken within historic resources. The following presents these 10 standards and briefly discusses the level of compliance of the proposed project at 604 Milverton Road in Los Altos. For each Standard, a level of compliance is given: Compliant, Marginally Compliant, or Not Compliant. A *compliant* rating indicates that the alteration has little or no impact on the resource. A *marginally compliant* rating indicates that the overall historical significance of the resources is not impacted enough to warrant re-evaluation, but modifications to the proposed design are strongly recommended. *Not compliant* indicates that the proposed design would severely negatively impact the resource and its eligibility for formal listing on a local, state, or national inventory.

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 existing historic single-family house on the property is being converted from a "dwelling" to an "accessory structure" with the removal of the kitchen. The rest of the rooms on the interior will remain unchanged, as will the exterior of the building. No changes to the defining characteristic of the historic building are proposed as part of its conversion to an accessory structure.

The proposed project is compliant 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.*

As stated earlier in this report, GA's HRE from 2022 concluded that the existing historic house on the property—the Costello House—is significant for its architecture, as well as for its association with the overall development pattern of Los Altos and the South Bay region. In terms of architecture, the significant features that characterize the property include the roof forms, original window groupings, the French entry door, the apricot carving on the bargeboard, open eaves, and wood clapboard siding. None of these architectural aspects are to be affected by the proposed project, so the property's architectural significance will be retained.

In terms of the property's association with development patterns, it is significant for its transition from a large apricot farming property to single family residential suburban properties. The Costello House is one of the few remaining properties that convey the agricultural origins of Los Altos prior to its development into a primarily residential suburban community. The apricot and leaf carving above the front door symbolize this agricultural association, and the historic oak trees and wooded creek side location reflect some of the house's historic setting. Further, the story of the Costello Family is integrated into the conversion of Los Altos from an apricot-farming region to a suburban community. None of these aspects are to be affected by the proposed project; if anything, the construction of the new house is an extension of the suburban community development that the property is significant for representing.

The proposed project is compliant with Standard 2.

- 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.*

No changes that create a false sense of historical development are proposed as part of this project. The proposed new house will be on the far corner of the lot, away from the historic house, and it will be differentiated as new construction. The conversion of the existing historic house from a "dwelling" to an "accessory structure" does not involve any changes to the exterior of the house, and only minimal changes to the interior with the demolition of the kitchen.

The proposed project is compliant with Standard 3.

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

No changes that have acquired historic significance are to be affected by the proposed project. The existing historic house is constructed around an older, smaller cottage at its core, where the two wings were constructed around the smaller cottage. However, the current configuration dates to a 1910's Craftsman cottage, which has acquired historic significance in its own right. No alterations to this building's exterior are proposed, and the only change to the interior is the removal of the kitchen, which has been previously remodeled.

The proposed project is compliant with Standard 4.

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

The distinctive features, finishes, and examples of craftsmanship at the existing historic house, such as the building form, wood clapboard siding, and the apricot carving on the bargeboard will not be affected by the proposed project.

The proposed project is compliant 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.*

No deteriorated historic features at the existing historic house have been identified, so none are proposed to be repaired or replaced as part of this proposed project.

The proposed project is compliant with Standard 6.

- 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.*

Protection of existing historic finishes should be undertaken during demolition of the kitchen in the existing historic house. No surface cleaning of the historic structure is currently proposed as part of this project.

The proposed project is compliant with Standard 7.

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

No known archeological finds have been made in the area. However, should materials be found during construction, a qualified archeologist should be consulted for assessment and mitigation recommendations.

Based on available information, the proposed project is compliant with Standard 8.

- 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.*

As detailed under Standards 2, 3, 5, 6, and 7 above, this project will not destroy any historic materials that characterize the property. The proposed house is a simplified Mediterranean architectural style, which will differentiate it from the existing historic house, and it will be located on the far corner of the lot, away from the existing historic house. Furthermore, its proposed exterior materials—stucco walls and stone cladding—are similar and compatible with houses in the surrounding neighborhood, including 607 Milverton Road and 720 Morningside Road.

Although the proposed house is larger in scale than the houses in the immediate neighborhood, it sits on a much larger parcel, making the house proportionate to its lot area. In order to minimize the appearance of its proportion and scale, the proposed house is designed to appear as a single-story when viewed from Morningside Road; this

is achieved through the sunken basement design and the use of alternating roof forms on the elevation facing Morningside Road, which break up the massing and proportion of the facade. The new house will not be very visible from Milverton Road, due to the large trees located at the northeast of the property, while the rear of the new house will not be visible due to wooded areas at the back of the lot.

GA's 2022 HRE found that the Costello House did not retain integrity of Setting or Association because "The lot has been reduced from its original size and the neighborhood has changed as well. The property's former apricot orchards are no longer extant with new residential lots. The open space just off of Milverton Road was never a part of the active orcharding area." The referenced "open space" is the portion of the lot where the new house is proposed to be sited. The wooded creek side location of the existing historic house would remain as-is, as would the exterior of the existing house. Due to these reasons, as well as those outlined under the above Standards 1-8, the property at 604 Milverton will continue to retain the remaining five aspects of integrity: Location, Design, Materials, Workmanship, and Feeling.

The proposed project is compliant 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.*

If the proposed new construction were to be removed from the property in the future, the essential form and integrity of the historic property would not be affected. The new house is proposed to be sited on the far corner of the lot, away from the existing historic house, which is currently a relatively open area in terms of trees, vegetation, and site features. No additions or alterations are proposed for the existing historic house.

For these reasons, and those outlined under Standard 9 above, the property at 604 Milverton will continue to retain the remaining five aspects of integrity: Location, Design, Materials, Workmanship, and Feeling. The property's integrity of Setting and integrity of Association have already been compromised.

The proposed project is compliant with Standard 10.

Project Compliance Summary

The proposed project at 604 Milverton Road is compliant with Standards 1 through 10. Overall compliance is not necessarily a direct sum of the level of compliance with each individual standard, however that information is weighed with the overall impact on both the design and historical significance of the resource. Depending on the reasons for significance and the level of importance of the resource, different levels of overall compliance may result. For 604 Milverton Road, Garavaglia Architecture, Inc. finds the proposed project to be compliant overall.

Conclusion

Garavaglia Architecture, Inc. concludes that the proposed project at 604 Milverton Road is compliant with the Secretary of the Interior's Standards for Rehabilitation. The character-defining features of the existing historic house, such as the building form and massing, fenestration, bargeboard detailing, roof forms, wood siding, and the building's wooded creek side setting would not be affected by the proposed project. The new house proposed for construction is designed in a way that minimizes its scale and proportion in relation to its

surroundings; the new house is proposed to be sited on the far corner of the lot, away from the existing historic house; and if the proposed new construction were to be removed from the property in the future, the essential form and integrity of the historic property would not be affected.

Professional Qualifications

Kathleen McDonald

Ms. McDonald meets or exceeds the Secretary of the Interior's Professional Qualifications Standards for Architectural History. She has over 5 years of experience in the field of historic preservation, and she has completed a wide variety of projects ranging from large-scale surveys and community outreach down to standards compliance review for individual buildings.

Ms. McDonald's specific project expertise includes major involvement and direction in the projects listed, contributing expertise in historic and archival research, identification and documentation of historic resources, existing condition analysis and treatment recommendations, and compliance with the Secretary of the Interior's Standards.

Recent projects in which she has managed or had major research or technical involvement with include:

- Travis Air Force Base Historic Preservation Treatment Plan for Hangar 810, Fairfield, CA
- Pond Farm Condition Assessment Report for the Marguerite Wildenhain Residence, Guerneville, CA
- Alcatraz Wharf Rehabilitation Historic Preservation Treatment Plan, San Francisco, CA
- 50 UN Plaza Courtyard Masonry Conditions Survey and Treatment Recommendations, San Francisco, CA
- Five Wounds Historic Resource Survey, San José, CA
- Don Fernando Pacheco Adobe Historic Structure Report, Concord, CA
- Odello Creamery Historic Structure Report, Carmel, CA
- 637 Alvarado Row National Register Nomination, Stanford, CA
- 44 Sunnyside Avenue Historic Resource Evaluation, Campbell, CA
- Geneva Office Building Standards Compliance Review, San Francisco, CA
- 201 Baden Avenue Standards Compliance Review, South San Francisco, CA
- 47 Madrone Avenue Standards Compliance Review, Larkspur, CA
- 923-925 4th Street Standards Compliance Review, San Rafael, CA
- Vintage Tower Standards Compliance Review, San José, CA

Ms. McDonald received her Master of Historic Preservation and Bachelor of Design in Architecture from the University of Florida. Ms. McDonald then interned with the Preservation Foundation of Palm Beach, Florida, before working for the City of Key West, Florida, as a historic preservation planner. Her current position at Garavaglia Architecture is that of Conditions Assessment Specialist/ Architectural Historian.