

LETTER REPORT

March 17, 2026

TO: Frank Delgado

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FROM: Christopher D. McMorris, Principal Architectural Historian
Toni Webb, Senior Architectural Historian
JRP Historical Consulting, LLC
2850 Spafford Street, Davis, CA 95618

SUBJECT: Historic Resource Report of 313 University Avenue, Los Gatos, CA

Summary of Findings

The property owner of Santa Clara County Assessor Parcel Number (APN) 529-04-063 in Los Gatos, California, is proposing to demolish the remaining portions of an existing single-family residence therein and construct a new replacement residence for which proposed designs or plans have not yet been prepared. The subject residence, located at 313 University Avenue, is located within the University/Eleden Historic District, which the Town of Los Gatos (Town) originally adopted by Ordinance No. 1702 in 1986 and most recently in Ordinance No. 2168 in 2008. The Town presently considers the subject residence a contributor to the historic district. JRP Historical Consulting, LLC (JRP) was retained to prepare a historic resources report pursuant to Section 29.10.09030 (c)(2) of the Town Code.

JRP recorded the subject property photographically and through written field notes, prepared a description and inventory, and evaluated whether the subject residence therein met the criteria for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), either individually or as a contributor to a known or proposed historic district, along with the Town's Historic Preservation Committee's (HPC) findings criteria for potential historic resources. The subject residence has not been previously evaluated for either the NRHP or CRHR. While it has been considered as a contributor to the designated University/Eleden Historic District, the property has not been designated for local listing for its individual historical, architectural, and/or aesthetic significance, separate from its status as a historic district contributor. Based on its status as a historic district contributor, the residence at 313 University Avenue has been considered a historical resource under the California Environmental Quality Act (CEQA) as defined in CEQA Guidelines Section 15064.5(a).

This report concludes that the residence at 313 University Avenue does not meet the criteria for listing in the NRHP or CRHR because it lacks historical significance and integrity. The property also does not meet the HPC's findings criteria for potential historic resources. Although presently considered a contributor to the locally designated University/Edelen Historic District, research conducted for this project has concluded that the heavily modified building does not have any special historical, architectural, or aesthetic interest or value, does not retain historic integrity, and thus, does not significantly contribute to the local historic district. Furthermore, analysis of potential impacts to the University/Edelen Historic District from the demolition and construction

of a replacement residence at 313 University Avenue in accordance with Section 4.10 (new construction within a designated historic district) of the Town's Residential Design Guidelines would not result in a significant impact to historic district.

Fieldwork and Research Methodology

JRP Senior Architectural Historian Toni Webb conducted a field survey of the subject property on March 10, 2026. Documentation included digital photography and written descriptive notes of the building located at 313 University Avenue (APN 529-04-063) in the Town of Los Gatos. JRP conducted property-specific research for the development history of the parcel and the design and construction history of the subject building. On-site research was conducted at the Los Gatos Community Development's Building and Planning divisions and the Local History Room of the Los Gatos Public Library. JRP reviewed the following collections and/or files at the Local History Room: Historic Property Research Collection, Project Bellringer II files, 1941 Tax Assessment Survey, Anne Bloomfield Survey of 1991, Families of Los Gatos vertical file, and various city directories and published histories of the Town of Los Gatos. JRP also conducted research in primary and secondary sources online, including county surveyor records, recorded maps, Sanborn Fire Insurance maps, historic aerial photographs, city directories, US Census records, and historic newspapers. Furthermore, JRP reviewed the California Office of Historic Preservation's Built Environment Resource Database for Santa Clara County and the Santa Clara County Assessor's records for the subject parcel that the property owner provided to JRP.

Site History

The building documented herein was constructed at the southwestern corner of Lot 2, Block 7 of the Subdivision of Bentley and Pierce Tract, which was established in 1889. At the time of its construction, the house was part of a larger residential property developed by Harry Perrin (315 University Avenue). Santa Clara County Assessment records for this property estimated in 1941 that the construction date was around 1906; however, the 1908 Sanborn Fire Insurance map does not depict any building at this location. The building first appears on the next iteration of these fire insurance maps in 1928, along with an adjacent garage. By that time the larger property included two smaller secondary residences located along the rear (northwest) parcel line. See **Figure 1** for these Sanborn maps. By around 1906, ownership of the Perrin residence (Lots 2 and 3 of the Bentley and Pierce Tract) had transferred to Frank Bowman, a hod carrier (a bricklayer's or mason's laborer). Along with construction of a stone wall along the rear of his property, he improved his property with the construction of the small cottage described herein in 1909. A garage was also added adjacent to the residence at an unknown date. The 1910 population census lists the Frank Bowman and his family living on the property as well as Frank's mother with no indication of who resided in the small cottage separate from the main residence at 315 University Avenue, or the other small dwelling on the parcel.¹

¹ "\$160,000.00 The Year's Activity in the Building Line," *Los Gatos News*, December 31, 1909, 2; Sanborn Map Company, *Los Gatos, California*, (New York: Sanborn Fire Insurance Company, 1908), Sheets 5 and 6; Sanborn Map Company, *Los Gatos, California*, (New York: Sanborn Fire Insurance Company, 1928), Sheet 12; Sanborn Map Company, *Los Gatos, California*, (New York: Sanborn Fire Insurance Company, 1928) revised 1944, Sheet 12; Historic Property Research Collection, 315 University Avenue, Box 10 Folder 6 "University Avenue, on file at the Los Gatos Public Library's Local History Room; US Population Census, Santa Clara County, Redwood Township, Los Gatos Town, 1910, Enumeration District No. 83, Sheets 8A and B.

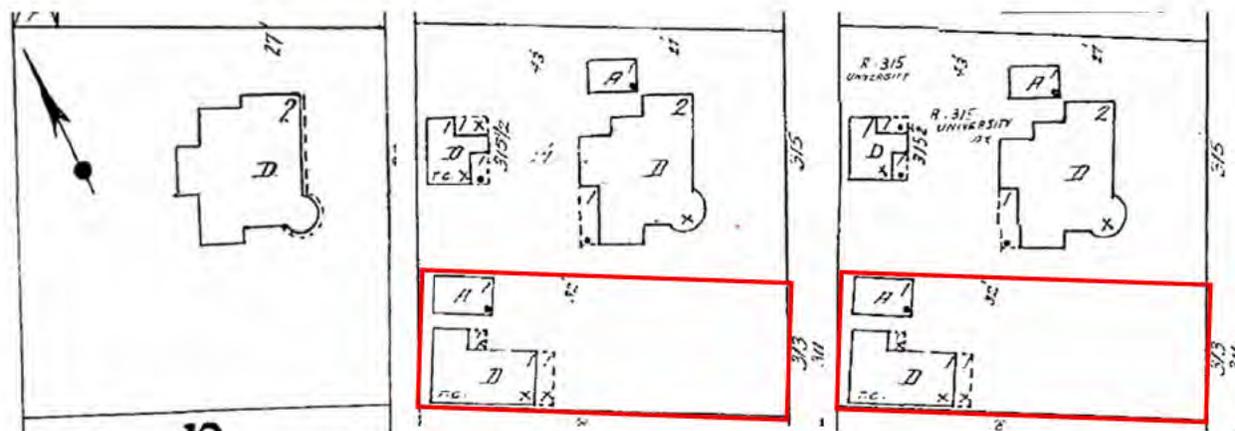


Figure 1. Sanborn Fire Insurance Maps in 1908 (left), 1928 (middle), and 1944 (right), showing the former Perrin property (315 University Avenue). The approximate current boundary of the subject parcel, 313 University Avenue, is shown in red.

The Bowman family owned and lived on the property through about 1922, followed by John H. Smith, an electrician, and his wife Rose between 1923 and 1924. It appears the following year the property was acquired by the Scott family, which included Rees Lewis Scott, a retired traveling salesman, his wife Donaldina and adult daughter, Nellie E. Scott. Donaldina and Nellie continued to reside in the former Perrin residence after Rees' death in 1932. In 1940, the local city directory and US population census lists the residence at 313 University Avenue for the first time with Albert Elroy, a carpenter, and his wife Cora, renting the building from the Scotts.²

Aerial photographs between 1931 and 1948 (Figure 2) show the building with roughly the same footprint as today. In 1941 the Santa Clara County Assessor documented 313 University classified the building as "cheap" and in "poor condition." The residence is also described at that time as a one-story, three-room dwelling with a shallow concrete foundation, a front and rear screened porch, and a detached garage.³ The only photograph found during research for this project was a rear view of the larger property, showing only the northwest corner of the building and its adjacent garage (Figure 3).

² US Population Census, Santa Clara County, Redwood Township, Los Gatos Town, 1930, Enumeration District No. 43-28, Sheet 7B; US Population Census, Santa Clara County, Redwood Township, Los Gatos Town, 1920, Enumeration District No. 142, Sheet 2A; US Population Census, Santa Clara County, Redwood Township, Los Gatos Town, 1910, Enumeration District No. 83, Sheets 8A and B; R. L. Polk Company, *Polk's Los Gatos City Directory* (San Francisco: R.L. Polk & Co. of California, 1923-1967); Historic Property Research Collection, 315 University Avenue; US Population Census, Santa Clara County, Redwood Township, Los Gatos City, 1940, Enumeration District No. 43-45, Sheet 61B; Santa Clara County Assessor Records.

³ Historic Property Research Collection, 315 University Avenue; Santa Clara County Assessor Records; Historic aerial photograph, Flight C-1870, Frame C-27, flown by Fairchild Aerial Surveys, 1931-1932; Historic aerial photograph, Flight CDF5, Frame 4-46, April 1, 1948, flown for California Division of Forestry.

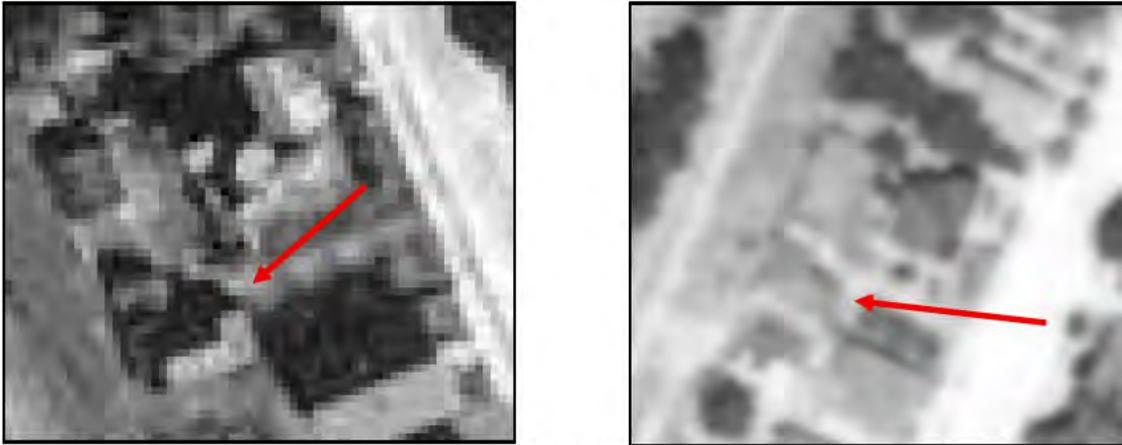


Figure 2. Aerial photographs from 1931 (left) and 1948 (right) show the general shape of 313 University Avenue (identified by red arrow) along with its associated garage.



Figure 3. View facing northeast showing the rear portion of the residence at 315 University Avenue after 1941. The photo also shows the southwest side of the house at 313 University Avenue and a portion of the garage at the left side of the image.⁴

Nellie retained her parent's property after Donaldina died in 1944. At that time, it appears she subdivided the southern portion of Lot 2 that contained the residence at 313 University Avenue and also an associated garage, and sold the smaller property to George A. and Aethel Pearl Alford. The Alford's made the small cottage their home. George died in 1948 but Pearl continued to own and reside in the residence until around 1957. The residence was thereafter used primarily as a

⁴ Anne Bloomfield Survey, 313 University Avenue, 1991.

rental with various tenants living there for short periods of time. By 1970 ownership had transferred to Wallace Miceli who continued to rent the residence over the next few years. In 1972 Dolores Jalali purchased the property and retained the residence as a rental through 2012. **Figure 4** shows the residence in 1989 during the Jalali ownership.⁵ The garage was removed at an unknown date.



*Figure 4. View of residence in 1989.*⁶

Property Description

The subject parcel is a 0.10-acre residential parcel that contains a modest and heavily modified National Folk-style residence setback approximately 70 feet from the public sidewalk. All landscape and hardscape was installed within the last fifteen years. The approximately 680-square-foot, irregularly shaped building (**Figures 5-11**) is composed of a central two-story gable-roof rectangular section, an enclosed shed-roof porch on its southwest façade, a rectangular shed-roof section attached to its northwest side, and a small shed-roof addition attached on the northeast side. All roofs are of varying heights, have wood fascia boards, and are finished with modern composition shingles. The residence is clad in a mixture of redwood channel and shiplap wood siding with some cornerboards. More than half of the windows have been removed or been replaced with modern aluminum and vinyl frame sliding and/or double-hung sashes. Many of these have crudely constructed wood trim. Remaining windows consist of four-light sliding, six-over-one, and one-over one double-hung wood sashes, set with simple wood trim and wood lug sills. The building includes two entrances; one consists of a single-light wood replacement door; the door has been removed from the other.

⁵ R. L. Polk Company, *Polk's Los Gatos City Directory* (San Francisco: R.L Polk & Co. of California, 1923-1967); Historic Property Research Collection, 315 University Avenue; "Donaldina Scott Called by Death," *Los Gatos Times-Saratoga Observer*, February 4, 1944, 10; "Trustee's Sale No. 141," *Los Gatos Times-Saratoga Observer*, October 28, 1975, 11; "Nellie Scott dies at 80," *Los Gatos Times-Saratoga Observer*, March 30, 1965, 8; "Services Conducted for G. A. Alford," *Los Gatos Times-Saratoga Observer*, May 7, 1948, 1; US Population Census, Santa Clara County, Los Gatos Town, 1950, Enumeration District No. 43-101, Sheet 77; "Vacant Home Burglarized," *Los Gatos Times-Saratoga Observer*, August 11, 1970, 10; Santa Clara County Assessor Records.

⁶ Historic Property Research Collection, 315 University Avenue.

Building Condition

Overall, the building at 313 University Avenue in its present state is in poor condition. The building has no foundation and is set over a partially excavated basement and temporarily supported by wood posts and beams, and it is shored on its southeast and northwest side by wood posts. All of the building's interior finishes (wallboard, trip, plumbing, etc.) have been stripped and all first-floor interior wall framing and floor joists, as well as stairs, have been removed. Portions of the main roof are sagging, and some siding has been removed or damaged for the placement of temporary shoring. While the current study did not survey the interior of the structure due to its instability, dry rot and termite damage is evident within the wood windows and trim as well as siding. A structural condition assessment report prepared in 2025 confirms the widespread decay of the building's structural members and siding, as well as structural deficiencies in the roof and exterior walls.⁷

Photographs



Figure 5. Overall view from sidewalk along University Avenue.

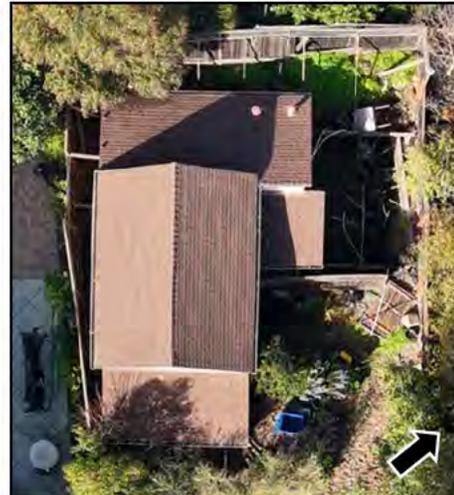


Figure 6. Overall showing shoring attached to fence as well as partially excavated basement.



Figure 7. View of southeast side.



Figure 8. View of northeast side.

⁷ Paul E. Slattery, Structural Engineers Incorporated, Letter to the Chief Building Official, Town of Los Gatos Building and Planning, April 29, 2025.



Figure 9. Northeast side, showing modern door and windows.



Figure 10. Northeast side, showing original wood windows.



Figure 11. View looking northwest of the interior of the residence.

Current Historic Status

The residence at 313 University Avenue was included in the architectural survey conducted by Anne Bloomfield in 1991, which identified the building's style as "generic" with an estimated date of 1920s, and the only alterations noted were an enclosed porch.

As noted, the building has been considered a contributor to the University/Edelen Historic District, a locally designated historic district (HD-86-1B, Ordinance No. 2168). The district appears to have significance for its late nineteenth century land development and for its architectural distinction. According to Ordinance No. 2168:

Victorian is [sic] predominant architecture, including information wood frame cottages and impressive homes, intermixed with Craftsman/Bungalow style cottages built somewhat later. Also present in smaller numbers are Colonial Revival. Contributing structures are both residential and commercial. Individual architectural distinction is not as important in a historic district as the neighborhood entity created. The University/Eleden district has easily identifiable boundaries which add to it [sic] perception as a district neighborhood.

The district includes 63 contributing buildings, including the subject residence and the adjacent Perrin House, which is identified as one of the significant residences within the district. No period of significance is noted for the historic district although cursory review of the contributors listed in Appendix C of the Town's Draft 2020 General Plan EIR suggests most contributors were constructed between the 1870s and 1950s.

The residence at 313 University Avenue has not previously been formally evaluated for either the NRHP or CRHR, nor has it been designated for local listing for its individual historical, architectural, and/or aesthetic significance.

Historic Assessment

Eligibility for Listing in the National Register or California Register

This report concludes that the residence at 313 University Avenue is not eligible for listing in the NRHP or CRHR either individually or as a contributor to a known or potential historic district because it lacks significance and integrity.

Under NRHP Criterion A and CRHR Criterion 1, this residence does not have direct or important associations with significant historic events or patterns of development. The building was constructed in 1909 as a secondary residence to a larger 19th century home. The building likely initially served as a guest house and/or rental until it was subdivided from the larger residential property. Although it was owner-occupied for short periods of time during its more than 100-year history, the building was used as a rental for most of that time. Constructed twenty years after the establishment of the Bentley and Pierce Tract, the residence is not associated with events that have made a significant contribution to the Town and is not significant within the context of residential or economic development of the Town of Los Gatos.

This property has no demonstrable association with the lives of persons important to history, as defined under NRHP Criterion B and CRHR Criterion 2. While this property was constructed within the property of the former Perrin residence, this building has no direct association with any member of the Perrin family as it was completed several years after they sold their property. None of the original or subsequent known owners or tenants directly associated with the residence, including Frank Bowman, the Rees, Donaldina, Nellie Scott, Frank or Pearl Alford, Wallace Miceli, or Dolores Jalali, made demonstrably important contributions to history on the local, state, or national level. Thus, this property does not appear eligible under these criteria.

Under NRHP Criterion C and CRHR Criterion 3, the residence is not significant as an important example of a type, period, or method of construction, does not possess high artistic value, and is not the important work of a master architect or builder. Architecturally, this residence is a heavily modified front-gabled National style residence, made popular after the nationwide expansion of the railroad in the 1860s. The building retains the most basic characteristics of that style, including a low-pitch gable roof, wood sash windows and horizontal wood siding. No known architect is

associated with the design of this building. Instead, it was likely built by Frank Bowman, property owner at that time. Therefore, the building is not the work of a master builder or architect.

Furthermore, under NRHP Criterion D and CRHR Criterion 4, this residence is not significant, as it has not yielded and is not likely to yield data important to the understanding of history or about historic construction materials or technologies that are not otherwise well documented. Also, the land use and the layout of the extant built environment resource on the parcel, and the relationship that the built resource has with the surrounding landscape, is unremarkable and does not appear to provide important information within the broader economic, social, and cultural setting of the region during its historic period occupation.

The residence at 313 University Avenue has been heavily altered since it was originally constructed in 1909. Alterations include the enclosure of the front and rear porches after 1941; replacement of some original siding at unknown dates; replacement of various original windows with modern vinyl and aluminum sashes and removal of some windows likely after 1970; removal and replacement of original doors likely after 1970. In addition, the foundation has been removed and all interior framing, including floor joists and stairs, as well as all interior finishes, have been removed, and a partial basement has been excavated. The building is temporarily supported by wood posts and beams, and it is shored on its southeast and northwest side by wood posts. Furthermore, the building is suffering widespread decay of the building's structural members and siding, as well as structural deficiencies in the roof and exterior walls. While the building retains its integrity of setting and location, the deterioration of the building, combined with the numerous alterations conducted over time, have resulted in the substantial loss of the building's integrity of material, workmanship, design, feeling, and association. Therefore, lacking significance and integrity, the building is not eligible for listing in the NRHP or CRHR.

Analysis Using Historic Preservation Committee Findings Criteria

With the historical evidence presented herein and the evaluation conclusion above, this report also concludes that the residence does not have any special historical, architectural, or aesthetic interest or value, and does not significantly contribute to the local University/Edelen Historic District. The following applies the HPC's findings criteria for evaluating potential historic resources:

1. The structure is not associated with events that have made a significant contribution to the Town.

The residence was constructed in 1909 as a secondary dwelling to a larger 19th century house and likely served as a guest house and/or rental until it was subdivided from the larger residential property. Although it was owner-occupied for short periods of time during its more than 100-year history, the building was used as a rental for most of that time. Constructed twenty years after the establishment of the Bentley and Pierce Tract, the residence did not significantly contribute to the residential or economic development of the Town.

2. No significant people are associated with the site.

Although the subject parcel was originally part of a larger residential property owned by the Perrin, Bowman, and Scott families, there is no indication in the historic record that any member of these families, nor any subsequent owners or tenants of the current site including the Alford, Miceli, or Jalali families, made demonstrably important contributions to history on the local, state, or national level.

3. There are no distinctive characteristics of type, period or method of construction, or representation of the work of a master.

Architecturally, this residence is a heavily modified front-gabled National style residence, made popular after the nationwide expansion of the railroad in the 1860s. The building retains the most basic characteristics of that style, including a low-pitch gable roof, wood sash windows and horizontal wood siding. No known architect is associated with the design of this building. Instead, it was likely built by Frank Bowman, property owner when it was constructed. Therefore, the building is not the work of a master builder or architect.

4. The structure does not yield information to the Town history.

This residence is not significant, as it has not yielded and is not likely to yield important information to the understanding of the Town of Los Gatos' history. Also, the land use and the layout of the extant built environment resource on the parcel, and the relationship that the built resource has with the surrounding landscape, is unremarkable and does not appear to provide important information within the broader economic, social, and cultural setting of the Town during its historic period occupation.

5. The integrity has been compromised such that the structure no longer has potential to convey significance.

The residence has been heavily altered since it was originally constructed in 1909. Alterations include the enclosure of the front and rear porches after 1941; replacement of some original siding at unknown dates; replacement of various original windows with modern vinyl and aluminum sashes and removal of some windows likely after 1970; removal and replacement of original doors likely after 1970. In addition, the foundation has been removed and all interior framing, including floor joists and stairs, as well as all interior finishes, have been removed, and a partial basement has been excavated. The building is temporarily supported by wood posts and beams, and it is shored on its southeast and northwest side by wood posts. Furthermore, the building is suffering widespread decay of the building's structural members and siding, as well as structural deficiencies in the roof and exterior walls. While the building retains its integrity of setting and location, the deterioration of the building, combined with the numerous alterations conducted over time, have resulted in the substantial loss of the building's integrity of material, workmanship, design, feeling, and association.

Potential Impact to Historic District

This report concludes that the proposed demolition of the residence at 313 University Avenue and construction of a replacement residence with a similar architectural design and scale of the extant building has the potential to not present any significant impacts under CEQA Guidelines Section 15064.5(b) to the overall University/Edelen Historic District. The extant residence has been heavily altered and has been in poor condition for an extended period of time. Its demolition would account for just one-percent of the overall contributors of the historic district. The 200 and 300 blocks of University Avenue, including the subject parcel, encompasses nearly half of the district's contributors. Buildings within these two blocks are predominantly of Queen Anne, Italianate, and Craftsman architectural style buildings, which generally have 15- to 25-foot setbacks and include side driveways. The subject building is sandwiched between the Romanesque-style Perrin residence (315 University Avenue), a primary contributor to the district, and a Craftsman -style residence (303 University Avenue). See **Figures 12-15** for views of the historic district in the vicinity of the subject property. When viewed from the southeast side of University Avenue, the subject residence is not readily visible because of its deep setback

(approximately 70 feet) from University Avenue, which is inconsistent with the district's overall character. Construction of a replacement residence that would have a similar scale and mass, and use similar materials and architectural features, such as a low-pitch gable roof, wood sash windows, and horizontal wood siding, and that would be in accordance with Section 4.10 (new construction within a designated historic district) of the Town's Residential Design Guidelines, would not substantially change the views, setting, or character of the historic district, and the district would still be able to convey its historical significance for which it is designated.⁸



Figure 12. View looking northwest at 313 University Avenue (center background) from the southeast side of University Avenue, showing the Perrin residence (right).



Figure 13. View looking southwest toward 313 University Avenue from Boyer Lane, showing the Perrin residence (center).

⁸ Town of Los Gatos, *Single and Two Family Residential Design Guidelines*, Adopted October 6, 2008.



Figure 14. View of historic district looking northeast along University Avenue from northwest corner of University and Bachman avenues, showing Los Gatos Fire Station (non-contributor) at the right.



Figure 15. View of historic district looking southeast along University Avenue from 313 University Avenue.

TREATMENT OPTIONS AND RECOMMENDATIONS

Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties

The purpose of the SOI Standards and Guidelines is to provide guidance to historic property owners, managers, preservation consultants, etc., prior to commencement of work. When choosing an appropriate treatment, the historic building's significance, physical condition, proposed use, code or other safety regulations, and available documentation of the property, must be considered. All work should preserve the character and integrity of the historic property, regardless of the chosen treatment approach.

Of the four treatment levels, Preservation requires the retention of the greatest amount of historic material as well as the property's historic form. Rehabilitation permits possible reuse through alterations and additions with latitude for the replacement of extensively deteriorated, damaged, or missing features using in-kind or substitute materials. In Restoration, the property may be depicted at a specific time in history through the preservation of materials, features, finishes, and spaces, and removal of alterations from other periods. Reconstruction is applied where there is little to no historic material remaining and is the most limiting of the four treatments in that it requires the highest level of accuracy based on documentary evidence.

For the current project at 313 University Avenue, the treatments of preservation, restoration, and reconstruction are not recommended because 1) the documented widespread decay of the subject building's structural members, siding, and windows, and missing exterior doors and windows, would require extensive replacement of historic features and fabric and 2) there is no known documentary evidence that would allow the accurate replacement or reconstruction of the residence.

SOI Standards guidance state that 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 time is not appropriate, Rehabilitation may be considered as a treatment." Therefore, of the four SOI treatment options, rehabilitation would be the only potential option for this residence if application of this treatment was feasible.

The standards for rehabilitation are:

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.
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.
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.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
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.

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

The current poor condition of the residence likely renders rehabilitation as an infeasible treatment option. Because most of the windows and doors have been replaced or are missing, and the widespread decay throughout the structural framing, siding, and remaining windows, a rehabilitation would likely result in the extensive removal of the remaining distinctive materials and/or alteration of features, resulting in excessively high costs and an effective demolition of the residence.

Portions of the SOI Standards treatment of rehabilitation can be applied to a replacement building at 313 University Avenue to help avoid causing a substantial adverse change to the University/Edelen Historic District. The proposed building on the subject parcel should retain the historic use of the property, i.e., a residence, and its design should preserve the historic character of the district by retaining appropriate spaces and spatial relationships with the adjacent contributors. This would be accomplished by appropriate setbacks. The replacement house should be compatible with the historic district's contributors in materials, features, size, scale, proportion, and massing, but it should also be differentiated from the old and not create a false sense of historical development by using elements from other historic properties. Furthermore, if this new house were to be removed in the future, the essential form and integrity of the historic district, and its environment, should remain unimpaired. This guidance is intended to approximate Section 4.10 (new construction within a designated historic district) of the Town's Residential Design Guidelines.

Preparers' Qualifications

This study was prepared under the general direction of Christopher D. McMorris (M.S., Historic Preservation, Columbia University), JRP Vice President and Principal Architectural Historian with 27 years of experience conducting these types of studies. Based on his level of experience and education, Mr. McMorris meets the Secretary of the Interior's Professional Qualification Standards under History and Architectural History (as defined in 36 CFR Part 61).

JRP Senior Architectural Historian Toni Webb (B.F.A., Historic Preservation, Savannah College of Art & Design) has more than 26 years of experience in historic preservation and public history working on a variety of research and cultural resource management projects throughout California. Ms. Webb meets the Secretary of the Interior's Professional Qualification Standards under History and Architectural History (as defined in 36 CFR Part 61).