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December 14, 2022
Project No: 21-11331

Claire Raybould, AICP, Senior Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301
via email: Claire.Raybould@cityofpaloalto.org

Subject: Secretary of the Interior's Standards Analysis Update – Revised
200 Portage Avenue Condominium Project, Palo Alto, California

Dear Ms. Raybould:

Rincon Consultants, Inc. (Rincon) was retained by the City of Palo Alto (City) to conduct a historical resources impacts analysis for a project at 3200 Park Boulevard, Palo Alto, California. The proposed project involves the demolition of a portion of the existing commercial building at 200 Portage Avenue, originally built for the Bayside Canning Company beginning in 1918. The property, inclusive of the warehouse building and related office building located at 3201-3225 Ash Street, was evaluated in a Historical Resources Evaluation (HRE) by Page & Turnbull on behalf of the City of Palo Alto in February 2019 and recommended eligible for listing in the California Register of Historical Resources (CRHR) at the local level under Criterion 1 (Events) for its association with the canning industry in Santa Clara County. Therefore, the property is considered a historical resource as defined in Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines. Rincon prepared a Historical Resources Assessment and Impacts Finding Memorandum for the proposed project in February 2022, and found that the proposed project, which included demolition of approximately 40 percent of the warehouse building would constitute material impairment to the historical resource, and would not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). The memorandum further found that several elements of the treatment for the portion of the warehouse building proposed to be retained were inconsistent with the Standards due to the planned removal of distinctive and character-defining features that characterize the property (Attachment 1).

Rincon's February 2022 memorandum prepared for the purposes of the Environmental Impact Report prepared for the 200 Portage Avenue Townhome Project (which included a 91-unit townhome development) analyzed impacts of that proposed project on the identified historical resource. This memorandum analyzes the proposed Development Agreement alternative, which includes further modifications to the cannery building as well as the addition of a parking garage at the rear of the property. This assessment considers how the proposed modifications under the Development Agreement Alternative conforms to the Standards and provides recommendations, where appropriate, on how the modified design can more successfully adhere to the Standards.[1] Methods for the current assessment included a review of Development Agreement project plans as well as a memorandum

[1] Pursuant to Section 15064.5(b)(3) of the CEQA Guidelines, projects that comply with the Standards are generally considered to mitigate impacts to historical resources to a less than significant level.

completed by the project applicant's historic consultant, Architectural Resources Group (ARG) in July 2022, which provided guidelines for the treatment of the property intended to be incorporated into the Development Agreement for the property (Attachment 2). It also included review of a phasing plan the project applicant submitted to the city in December 2022 (Attachment 3). This review was also informed by guidance documents from National Park Service, including a series of documents published by the Technical Preservation Services division called "Interpreting the Secretary of the Interior's Standards for Rehabilitation" (ITS).

The Rincon team included Architectural Historian JulieAnn Murphy, who served as primary author of this memorandum. Senior Architectural Historian and Program Manager Steven Treffers and Principal Shannon Carmack provided oversight and assisted with the analysis. Ms. Murphy, Mr. Treffers, and Ms. Carmack meet the Secretary of the Interior's *Professional Qualification Standards* (PQS) for architectural history and history (26 CFR Part 61).

Brief Project Description

As described in the February 2022 memo, the project site encompasses approximately 14.27 acres across four parcels (Assessor's Parcel Numbers 132-38-071, 132-32-036, 132-32-042, and 132-32-043) that would be developed with 91 new condominium townhouse units and associated site improvements. To accommodate the proposed residential development, a portion of the historic warehouse building would be demolished. The portion of the warehouse building proposed to be retained would be updated for retail and Research and Development uses and updated to comply with the current building and green building codes, a requirement under state law and the City's municipal code for substantial modification of a commercial building. Proposed improvements would include modifications to existing entries and windows, replacement of corrugated metal siding, new storefront windows and skylights, new canopy awnings at entries, and floorplan modifications at building's southeast and northeast elevations for a new amenity space. The retained warehouse portion would be connected to a two-story parking garage addition at its north elevation.

Brief Property Background and Chronology

As described in the HRE prepared by Page & Turnbull, the oldest portions of the warehouse building were constructed in 1918 for the Bayside Canning Company, which was owned by Chinese immigrant and prominent canning mogul, Thomas Foon Chew. After Chew's death, the cannery was subsequently purchased and operated for more than 20 years by the Sutter Packing Company, another fruit and vegetable cannery. The Sutter Packing Company significantly expanded the cannery building and its operations throughout the 1930s and 1940s as it prepared for and raced to meet the demands of World War II. The expansion projects included the construction of the extant office building at 3201-3225 Ash Street to the southeast of warehouse building. For a time, the cannery was the largest employer in the Mid-Peninsula, and when it closed in 1949, it was the largest employer in Palo Alto.

The property had a number of owners following Sutter Packing Company including the following: Safeway (1946-1949); unknown (1949-1978); WSJ Properties (c. 1978-1998); Unknown (c.1998-2002); Robert Wheatley Properties (c. 2002-2010); and the Sobrato Organization (Present). A number of different tenants occupied the portion of the warehouse building proposed to be retained during the years following Sutter Packing's closure including Basket Galleria, Inc., MaxiMart, and most recently Playground Global and Nauto. A portion of the building proposed to be retained as well as a portion of which would be demolished was last occupied by Fry's Electronics.

The period of significance of the property, including the warehouse building, begins in 1918, when canning operations began at the site under the Bayside Canning Company, and ends in 1949, when the Sutter Packing Company's canning operations at the building ended.

Secretary of the Interior's Standards

The Standards provide guidance on the preservation and protection of historic properties and make broad-brush recommendations for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They cannot, in and of themselves, be used to make essential decisions about which features of a historic property should be saved and which might be changed. Rather, they provide philosophical consistency to the work.[2] There are Standards for four distinct, but related, approaches to the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The Rehabilitation Standards are the appropriate treatment standards for this analysis because the proposed project involves the new use of a historic building. Furthermore, only Rehabilitation Standards allow alterations and the construction of new additions, if necessary for a historic building's continued or new use.[3]

The Secretary of the Interior's Standards for Rehabilitation state:

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.

[2] Anne E. Grimmer and Kay D. Weeks, "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings," National Park Service, 2017, 3.
[3] National Park Service, "The Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation as a Treatment and Standards for Rehabilitation, https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm, access November 10, 2022.

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 shall 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 a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Character-Defining Features

The intent of the Standards is to provide for the long-term preservation of a property's significance through the preservation of its historic materials and features. These historic materials and features are commonly referred to as character-defining features and are indispensable in a historic property's ability to convey the reasons for its historical significance.

The warehouse building at 200 Portage is significant for its association with the canning industry in Santa Clara County. As such, its character-defining features relate to its representation of its industrial canning history, and include the following, as identified in the HRE prepared by Page & Turnbull:

- Form and massing
  - Long, linear massing
  - Composition of multiple smaller buildings
  - Primarily one story, double-height volumes with taller central cannery section
- Varied roofs and structures
  - Prominent paired monitor roofs
  - Arched roofs
  - Visible gable roofs
- Exterior wall materials
  - Reinforced, board formed concrete
  - Corrugated metal cladding
- Exterior cannery features
  - Concrete loading platforms
  - Cooling porch at rear of building
  - Exterior shed awnings with wood post-and-beam construction
- Fenestration
  - Wood frame windows
  - Garage door openings
  - Wire glass skylights over former warehouses
- Landscape features
  - Preserved curved path of the removed railroad spur tracks, represented in the shape of parking lot pavement

- Channel of Matadero Creek
- Interior features
  - Exposed wood truss ceilings
  - Wood and concrete post and beam construction
  - Concrete floors

To ensure a proposed project's compliance with the Standards, a historic property's character-defining features should be preserved as part of the final design. In rehabilitation, historic building materials and character-defining features are protected and maintained as they are in the Preservation Standards. However, greater latitude is given in rehabilitation to replace extensively deteriorated, damaged, or missing features using the same or compatible substitute materials.

Secretary of the Interior's Standards Analysis

The following presents an analysis of the proposed project's modified design's adherence to the applicable Rehabilitation Standards by proposed scope item.

Proposed Demolition

The Development Agreement Alternative proposes to demolish the eastern portion of the historic warehouse building, resulting in a loss of approximately 40 percent of the building, consistent with the 200 Portage Avenue (91 Unit) Townhome Project. As discussed in the February 2022 analysis, the demolition of the building would not be consistent with the Standards which recommends avoiding loss of historic materials through demolition and removal and encourages the retention of distinctive materials that characterize a property. The proposed demolition would cause a loss of several of the property's character-defining features outlined above, including its form and massing and varied roof forms and structures. The modified design for the proposed project, similar to the Townhome Project, would still be inconsistent with Standard 1, 2, 5, and 6.

Structural Retrofit

In November 2022 the project applicant provided clarification to City staff that a portion of the building between the tenant space for Playground global and west of the monitor roofs may require further modifications than originally anticipated. The phasing plan reflects that this area would be rehabilitated. However, the applicant has indicated that the extant roof would require complete reconstruction, discussed in more detail below, to accommodate the weight of required solar panels and HVAC equipment upgrades. To allow for the upgrades, the applicant would install an interior support to stabilize the exterior walls while this work is completed. The exterior walls are corrugated metal, much of which has deteriorated over time. The applicant is proposing a salvage study to determine whether any of the exterior material could be retained, or whether replacement with like material is necessary. Ultimately, if the material must be replaced, these modifications may be more extensive than originally anticipated. Ultimately, these additional modifications necessary to accommodate structural upgrades, which could amount to demolition depending on how much of the exterior could actually be retained, and could potentially be inconsistent with Standard 2 and 6.

New Storefronts, Entries and Canopies

The proposed modified design includes new storefront entries at the north and south elevations. Storefront entries will be topped with flat, metal canopies at select locations on the north and south elevations.

South Elevation Entries

The building's south elevation ground floor openings are proposed to be updated. Existing openings at the west end of the elevation will be retained, while all other existing openings are proposed to be removed. The HRE identified the south elevation as the primary, or most important, elevation.

The central portion of this elevation's bays are proposed to receive five fully glazed storefront systems, two of which will feature single-entry glazed doors. One of the character-defining features identified for the building were the garage doors at former loading bays, one of which is present on the south elevation. As described in the National Park Service's guidance document *ITS Number 16: New Infill for Historic Loading Door Openings*, retaining loading doors in buildings such as warehouses and other industrial and manufacturing buildings is important for maintaining the historic character of these structures.[4] The current modified design, which proposes to remove the former loading entry does not meet Standard 2, 5, 6, or 9. In order to fully meet the Standards, the design should be refined to retain the existing openings, inclusive of the intact roll-up doors.

The final bays, below the monitor roof portion of the building are proposed to include two entries within a new amenity space that will be established by enclosing the area below the existing canopy at the west end of the elevation and include a one-story portion at the east end of the elevation. One portion of the proposed amenity space would extend for two stories, ending below the monitor roof portion of the building and feature a double-height storefront system and a paired door entry. It would extend to a one-story portion at the building's corner and would feature a storefront system with a second, paired entry, and both would be clad in a new, corrugated exterior material.

Rehabilitation of buildings allows for additions and alterations for new uses, but encourages preservation or minimal change to primary elevations, as provided in *NPS Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*.[5] When additions cannot be added to a secondary elevation, additions and alterations to primary elevations should be designed to be compatible with the historic building and should not become the primary focus. This can be achieved by being designed in the appropriate scale and should be visually distinguishable from the historic building. The alterations for the proposed new amenity space at the south elevation do not meet Standard 9. The proposed change materially alters the remaining historic elevation. The modified design should be revised to not include a substantial alteration to the primary elevation. It should not obscure the historic building proposed to be retained. Additionally, and as noted in the HRE, the building's corrugated metal exterior is a character-defining feature. It is recommended that the proposed use of corrugated metal on the substantially altered portion of the building be revised to a different, compatible material to clearly distinguish the original historic building and the later modifications.

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[4] Kaaren R. Staveteig, National Park Service, Technical Preservation Services, *ITS Number 2: New Infill for Historic Garage Openings,* 1999.

[5] Anne E. Grimmer and Kay D. Weeks, National Park Service, *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns,* 2010.

North Elevation Entries

The north elevation's ground floor openings will be updated for the proposed new use. The existing paired and single door below the monitor roof portion of the building will be removed. The remaining paired entries to the west of the monitor roof portion of the building will also be removed, while the single entry, final paired entry, and what appear to be existing storefronts at the southernmost portion of the building will be retained.

New, fully glazed storefront systems with three entries will be installed in and area below monitor roofs at the first floor. The elevation will continue with three new storefront systems with full-height glazing at the first floor and a transom above. The final bay of the grouping will feature a central, paired entry. The proposed design for the remainder of the elevation appears to be retain the existing configuration.

As described in *NPS ITS Number 22: Adding New Entrances to Historic Buildings*, in order to meet the Standards, new entrances should be simple in design, should not appear historic, should blend in with the historic façade, and should be modestly scaled.[6] The proposed storefront entries below the monitor roof portions of the building would result in the removal of the corrugated exterior that characterizes the property. The installation of expanses of glazing in new openings would result in the loss of historic material and create visual access to the interior of the building that did not historically exist. The proposed openings do not meet Standard 2 or 9. In order to more successfully meet the Standards, proposed new entries at these locations should be reduced in scale, and be pulled in at least one structural bay from each end of the character-defining roofline in order to retain more of the historic materials the building's spatial relationship.

Similarly, the large full-length glazing proposed at the remainder of the elevation do not meet Standard 2 or 9 and should be reconfigured. Current site conditions not reflected in the most current plan set show that an existing loading door opening is present in portion of the elevation. As discussed above, existing garage doors were identified as one of the building's character-defining features related to its historic use as a cannery. In order to adhere to the Standards more closely, the design should be updated to retain and reuse the existing framed opening instead of introducing three new openings.

Canopies

The proposed metal canopies at new entries are simple in design, consistent with building's historic industrial character and generally meet the Standards. However, the proposed removal of existing character-defining shed awnings with post and beam construction does not meet Standard 2 or 5. Shed awnings should be retained instead of being replaced with new canopies. Where shed canopies are deteriorated beyond repair, they should be replaced in kind instead of receiving a new canopy design.

New Window Openings

To accommodate the new use, several new window openings are proposed for the warehouse building at the north, south, and east elevation.

[6] Anne Grimmer, Technical Preservation Services, National Park Service, *ITS Number 22: Adding New Entrances to Historic Buildings,* 2001.

North and South Elevations

At the building's north and south elevations, new windows are proposed at double-height portion of the warehouse, below the distinctive, character-defining monitor roofs. Windows at the north elevation will include a central, fixed widow, each flanked by fixed windows with sloped openings, following the shape of the roofline. Windows at the south elevation will mimic what is proposed at the north elevation on one bay and will include a double-height storefront glazing system at the adjacent bay.

While rehabilitating historic buildings for new uses occasionally requires creating new window openings, the proposed location, design, and materials have to be consistent with the historic character of the building in order to meet the Standards. The windows proposed for the north and south elevations are not consistent with the building's historic, industrial character. As explained in *NPS ITS Number 14: New Openings in Secondary Elevations or Introducing New Windows in Blank Walls*, introducing new windows must not make a strong architectural statement as to radically change the appearance of the building or overwhelm the composition of the historic façade.[7] The scale, number, and placement of proposed windows makes a strong architectural statement that is incompatible with the historic character of the simple, industrial building and is therefore inconsistent with Standards 2, 5, and 9. Furthermore, the proposed new window openings at the north and south elevations, would introduce an embellishment to an otherwise simple façade that is not substantiated by historical evidence. Per guidance in *NPS ITS Number 38: Alterations without Historical Basis,* when there is no record of the historic appearance of a building, the rehabilitation should take into consideration its historic use and remaining evidence to design a compatible new or replacement feature.[8] One available photograph from the building's period of significance (1918-1949) was uncovered by Page & Turnbull during the preparation of the HRE. That photograph of what appears to be building's south elevation shows that the building's historic window configuration included a punched window opening below the monitor roof and some band windows below (Figure 1). The modified window design for the double-height portions of the north and south elevations does not meet Standards 2, 3, 5, 6, or 9 for the reasons described above. It is recommended that the north and south window configuration be updated to no longer include the fixed windows that follow the slope of the roofline.

[7] Kaaren R. Staveteig, National Park Service, Technical Preservation Services, *ITS Number 14: New Openings in Secondary Elevations or Introducing New Windows in Blank Walls,* 2000.
[8] National Park Service, Technical Preservation Services, *ITS Number 38: Alterations Without Historical Basis,* 2006.

Figure 1 1940 Image of Sutter Packing Plant

Source: Palo Alto Historical Association, Page & Turnbull HRE

East Elevation Windows and Skylights

The modified design includes a series of punched openings along the building's east elevation, on an area of the building that is currently obscured by an adjacent addition. It also proposes to include new skylight openings along the east and west slopes of the monitor roof portion of the building.

As described above, rehabilitating historic buildings for new uses may require inserting openings. Also, available historic documentation suggests that the east elevation likely had windows in the same location as generally proposed for the new windows. The proposed new window openings for the east elevation are, therefore, consistent with Standards 6 and 9. Similarly, the addition of skylights, proposed to be one structural bay from the building's edge on each end is consistent with the Standards. Care should be taken, however, to choose a window that is slim in profile as to not detract from the distinctive roofline that characterizes this portion of the building.

Existing Window Treatment

The modified design plans indicate that windows at the building's distinctive monitor roof will be replaced with new windows. In order to comply with Standards 2 and 5, original windows should be retained where condition allows. If windows are deteriorated beyond repair, they should be replaced with windows in kind. New windows should match the historic in configuration and profile and be manufactured in an appropriate replacement material.

Existing Exterior Cladding Treatment

The modified design plans indicate that the existing corrugated metal siding is proposed to be removed and replaced with new material where present. Similar to the replacement of existing windows, the historic exterior cladding material should be retained where condition allows in order to comply with Standards 2 and 5. If material is deteriorated beyond repair, it should be replaced with material in kind and should match the historic in color and composition.

Rooflines

One of the character-defining features identified for the building was the varied roofs and structures. The modified design proposes to significantly alter the roofline of the building adjacent to the monitor roof portion of the building and replace it with a flat roof.

As explained in NPS *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*, changes to a roofline can damage the visual character of a building and alter a feature that is crucial to understanding the character of a building.[9] It is understood that some of the proposed changes to the roofline are intended to meet code requirements, including the installation of solar panels. Guidance from NPS provides that solar panels can be accommodated on many existing roof forms, so long as they are not visible from the right of way.[10]

The proposed treatment is not consistent with Standard 2, 5, 6 and 9. The removal of the historic roofline will result in the loss of historic material and the alteration of an important physical features of the building. The proposed design should be revised to retain the varied rooflines. If structural updates are necessary to meet code requirements, the roof's overall form should be retained and replaced in kind.

Loading Platforms

The building's loading platforms along the north elevation, which appear to have been used as part of the cannery's cooling platform, were identified in the HRE as a character-defining feature. The modified design proposes to remove a large portion of the platform and replace it with a new covered amenity area at grade between the building and a proposed parking garage. The proposed treatment is not consistent with Standard 2, 5, 6, and 9. The removal of the loading platform will result in the loss of historic material and an element of the building critical to understanding its historic use. The revised design should be updated to retain more of the loading platform, including the change in grade from the adjacent parking lot.

New Construction

In order to accommodate the proposed new residential use, several elements of new construction are proposed for the site, including the addition of 12 townhouse buildings along east edge of the site, adjacent to the historic building and a two-story parking garage addition adjacent to and connect to the historic building's north elevation.

Townhouse Buildings

Proposed new townhouse buildings will be constructed along the east and northeast side of the historic building and will be arranged in a grouping of 12 buildings in a grid of private streets, providing access to each building. Townhouse buildings will be three stories with a ground floor garage and have a combination of painted stucco, fiber cement, and wood-look horizontal siding exteriors with variations

[9] Lee H. Nelson, National Park Service, *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character.*
[10] National Park Service, "Solar Panels on Historic Properties, https://www.nps.gov/orgs/1739/solar-panels-on-historic-properties.htm, accessed November 2022.

in design application between proposed buildings. They will feature alternating bays and have flat roofs. The addition of new construction within the boundaries of historic properties is possible, but needs to be built in a manner that protects the integrity of the historic building and the property's setting, as provided for the in NPS' *Guidelines for Rehabilitating Historic Properties*.[11] In order to conform to the Standards, the new construction cannot alter the historic character of the property, and the historic function must be evident. The location of new construction should follow the setbacks of the historic building and avoid obscuring, damaging or destroying character-defining features of the building, and the massing size, scale, and features of new construction must be compatible with those of the historic building.

The proposed townhouses are along the historic building's secondary elevations and will not obscure or interfere with the building's primary, or south, elevation. Furthermore, the distinctive monitor roof of the historic building will remain visible from the right of way. Though the buildings introduce a new, residential use, the proposed exterior materials and simple design for the townhouses is generally consistent with the historic character of the property. At three stories, the new townhouse buildings are less massive than the historic building are consistent with the double-height volume of the historic building. Finally, the historic building would remain if the townhouses were later removed. The proposed new townhouse construction is, therefore, generally consistent with Standard 9 and 10.

Garage Addition

The two-story parking garage addition is proposed for the historic building's secondary, or north, elevation. It will be two stories and connect to the historic building with a wood pergola that will be affixed to the adjacent new canopy proposed for this portion of the building's elevation, thereby creating a new outdoor amenity space at grade. The garage will have a concrete structure, horizontal cable railings at the second story, and be clad in corrugated metal at select locations.

The proposed scale, location, and massing of the proposed garage is consistent with the Standards. It will not obscure the historic building's primary elevation and generally proposes materials that are compatible with the historic building's industrial character. As provided in Standard 9 and explained in NPS *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns,* a new addition to a historic building should protect those visual qualities that made the building historic.[12] As noted in the HRE, the building's corrugated metal exterior is a character-defining feature. It is recommended that the proposed use of corrugated metal on the garage addition be revised to a different, compatible material to make it readily distinguishable from the historic building. The proposed new garage construction is consistent with Standard 9 and 10.

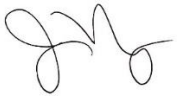
[11] Grimmer and Weeks, 2017.
[12] Grimmer and Weeks, 2010.

Conclusions

As detailed above, the proposed demolition of a large portion of the historic building is not consistent with the Secretary of the Interior's Standards for Rehabilitation. Similarly, several elements of the proposed new design include the removal of distinctive or character-defining features on the portion of the building proposed to be retained including the loading platforms, shed awnings with post and bean supports, varied roof forms, and garage door openings. In other instances, proposed alterations detract from the building's historic industrial character, including the location and configuration of proposed storefronts, the introduction of new openings and entries, and changes to the proposed primary elevation. The proposed construction of the new garage and townhouse buildings are generally consistent with the Standards. Where project elements do not comply with the Standards, Rincon has provided recommendations as detailed above and in the attached table (Attachment 4). Although incorporation of these recommendations would bring the project more in compliance with the Standards, the proposed demolition would still result in the material impairment of the historic building and therefore a significant impact as defined in Section 15064.5(b) of the CEQA Guidelines. Should you have any questions or comments regarding this report, please do not hesitate to contact the undersigned at 925-326-1159 or at jmuprhy@rinconconsultants.com.

Sincerely,

Rincon Consultants, Inc.



JulieAnn Murphy, MSHP
Architectural Historian Project Manager

Steven Treffers, MHP
Architectural Historian Program Manager

Shannon Carmack
Principal

Attachments

Attachment 1 Historical Resources Assessment and Impacts Findings, Rincon Consultants, Inc., February 2022

Attachment 2 Historic Design Guidelines Memorandum, Architectural Resources Group, July 2022

Attachment 3 Applicant Phasing Plan

Attachment 4 Summary Table of Recommendations

Attachment 1

Historical Resources Assessment and Impacts Findings

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February 17, 2022
Project No. 21-11331

Claire Raybould, AICP, Senior Planner
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via email: Claire.Raybould@cityofpaloalto.org

Subject: Historical Resources Assessment and Impacts Findings
200 Portage Avenue Condominium Project, Palo Alto, California

Dear Ms. Raybould:

Rincon Consultants, Inc. (Rincon) was retained by the City of Palo Alto (City) to conduct a historical resources assessment and impacts finding for the proposed 200 Portage Avenue Condominium Project in Palo Alto, California. The proposed project would involve the demolition of a portion of the existing commercial building at 200 Portage Avenue and the commercial building at 3040 Park Boulevard, and the construction of 91 new condominium units distributed throughout 16 three-story buildings.

The current assessment was prepared to support to compliance with the California Environmental Quality Act (CEQA) and to identify potential project-related impacts to historical resources. A previous historical resources evaluation was prepared by Page & Turnbull in 2019 on behalf of the City, which concluded the former Bayside Canning Company canning/warehouse building (340 Portage Avenue)[1] is eligible for listing in the California Register of Historical Resources (CRHR) at the local level under Criterion 1 (Events) for its association with the history of the canning industry in Santa Clara County (Attachment 1). Therefore, the building is considered historical resources as defined in Section 15064.5(a) of the CEQA Guidelines.[2] To supplement the 2019 analysis, Rincon has completed a cultural resources records search, a field survey and historical resources evaluation, a review of project plans, and preparation of this memorandum to present the results.

The Rincon team included Architectural Historian JulieAnn Murphy, who conducted the site visit and served as primary author of this report, which addresses the potential impacts for the project and Architectural Historian James Williams who conducted additional archival research. Senior Architectural Historian and Program Manager Steven Treffers and Principal Shannon Carmack provided oversight and assisted with the analysis. Ms. Murphy, Mr. Williams, Mr. Treffers, and Ms. Carmack meet the Secretary of the Interior's *Professional Qualification Standards* (PQS) for architectural history and history.

[1] There are 15 addresses associated with the property. The proposed project, including the area of proposed development uses the address 200 Portage Avenue. The historic resources evaluation refers to the site, including the former canning/warehouse building and the associated office building as 340 Portage Avenue. Herein and for consistency, the historic canning/warehouse building will be referred to 340 Portage Avenue.
[2] Page & Turnbull, *Historic Resource Evaluation for 340 Portage Avenue*, Prepared for City of Palo Alto, February 26, 2019.

Project Location and Description

The project site encompasses approximately 14.27 acres across four parcels. The project site includes all of Assessor's Parcel Numbers (APNs) 132-38-071, 132-32-036, 132-32-042, and 132-32-043 in the City of Palo Alto. The project site is roughly bounded by Park Boulevard to the north, Christopher Circle and Ash Street to the south, residences to the west, and commercial uses to the east.

The proposed townhome project would be located on the "area of proposed development" as indicated on Figure 1, which includes portion of the project site. The area of development encompasses approximately 4.86-acres and is generally bounded by Park Boulevard to the north, commercial development to the south, Olive Avenue and residences to the west, and Matadero Creek to the east. The area of development includes all of APNs 132-32-036, 132-38-01, and portions of APNs 132-32-042 and 132-32-043.

The proposed project would involve a vesting tentative map to subdivide and merge portions of the four parcels into two parcels. On one of the new parcels (4.86 acres), the project would involve a condominium subdivision to create 91 new condominium units. The other parcel (9.41 acres) would include the remaining portions of the existing commercial building. The proposed townhome project would involve demolition of the portion of the existing commercial building at 200 Portage Avenue and the commercial building at 3040 Park Boulevard within the area of proposed development and construction of 91 new residential units within 16 three-story buildings (Figure 2).

The proposed project would also involve improvements to an existing portion of the on-site, two-story commercial building at 340 Portage Avenue. The area of improvements for the existing commercial building is shown on Figure 3. The improvements would involve architectural changes to add new skylights, new gable windows, corrugated siding, and other architectural details (Figure 4, Figure 5, and Figure 6).

Figure 1 Project Location

Imagery provided by Microsoft Bing and its licensors © 2021.

Figure 2 Proposed Townhome Project Site Plan

Figure 3 Work Area for Improvements to Existing Building

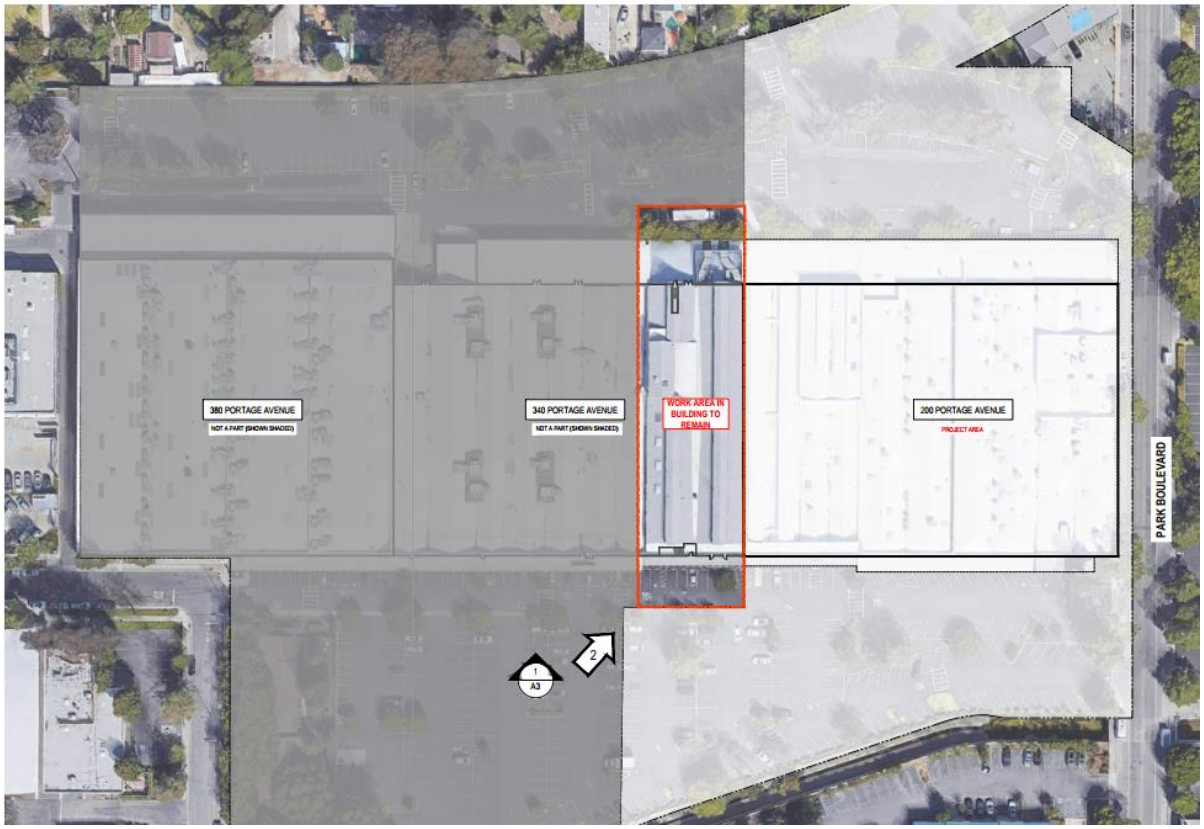


Figure 4 Rendering of Proposed View Facing Northeast

Figure 5 Proposed North Elevation Design

Figure 6 Proposed South Elevation Design

Methodology

The following sections identify the steps taken to inform analysis of the proposed project and its potential impacts. As discussed above, a previous historical resources evaluation was prepared in 2019 by Page & Turnbull, which concluded that the former Bayside Canning Company canning/warehouse building at 340 Portage Avenue, which is in the current project site, is eligible for listing in the CRHR. That evaluation also confirmed an associated office building located at 3201-3225 Ash Street contributes to the significance of 340 Portage Avenue; however, this small office building is located outside the area of proposed development. The City, as the lead agency under CEQA, directed Rincon to rely on the previous historical resources eligibility findings to inform the impacts assessment presented below. In addition to these efforts, Rincon conducted background research, a site visit, and prepared a historical resources evaluation of another property within the area of proposed development at 3040 Park Boulevard, which had not been subject to previous evaluation.

The project site also contains the concrete-lined Matadero Creek and two one-story office buildings on the east side of the creek at 3250 Park Boulevard and 278 Lambert Avenue. Because these two properties are less than 45 years of age, they do not meet the age threshold generally triggering the need for historical resources evaluation per the guidelines of the California Office of Historic Preservation (OHP) and they were not recorded as part of this study (OHP 1995). This portion of Matadero Creek was lined with concrete in 1994, does not meet the age threshold for evaluation and the proposed project does not include any direct alterations to the creek (WRA 2020). The proposed development is also consistent with the surrounding urban environment and would not negatively affect the existing setting. Therefore, no impacts are anticipated to occur to Matadero Creek and it was not recorded or evaluated as part of this study.

Background Research

The following documents were referenced to inform the history of the 200 Portage Avenue site and its historical significance and to ensure an understanding of the project.

- Page & Turnbull, Inc. *Historic Resource Evaluation for 340 Portage Avenue,* prepared for the City of Palo Alto*,* February 26, 2019.

- Page & Turnbull, Inc. *Memo: NVCAP Windshield Survey and Preliminary Historic Resource Eligibility Analysis,* April 11, 2019.
- KTGY Architecture and Planning. *200 Portage Avenue Townhomes,* August 3, 2021.
- The Sobrato Organization. *200 Portage Avenue, Palo Alto, CA 94306,* June 16, 2021.
- Historic aerial photos accessed via University of California, Santa Barbara Map & Imagery Lab and NETRonline.
- Historic topographic maps accessed via United States Geological Survey.
- Sanborn Fire Insurance Company Maps accessed digitally via Los Angeles Public Library.
- Historical newspaper articles and advertisements accessed online at newspapers.com.
- Historic permits, City of Palo Alto.

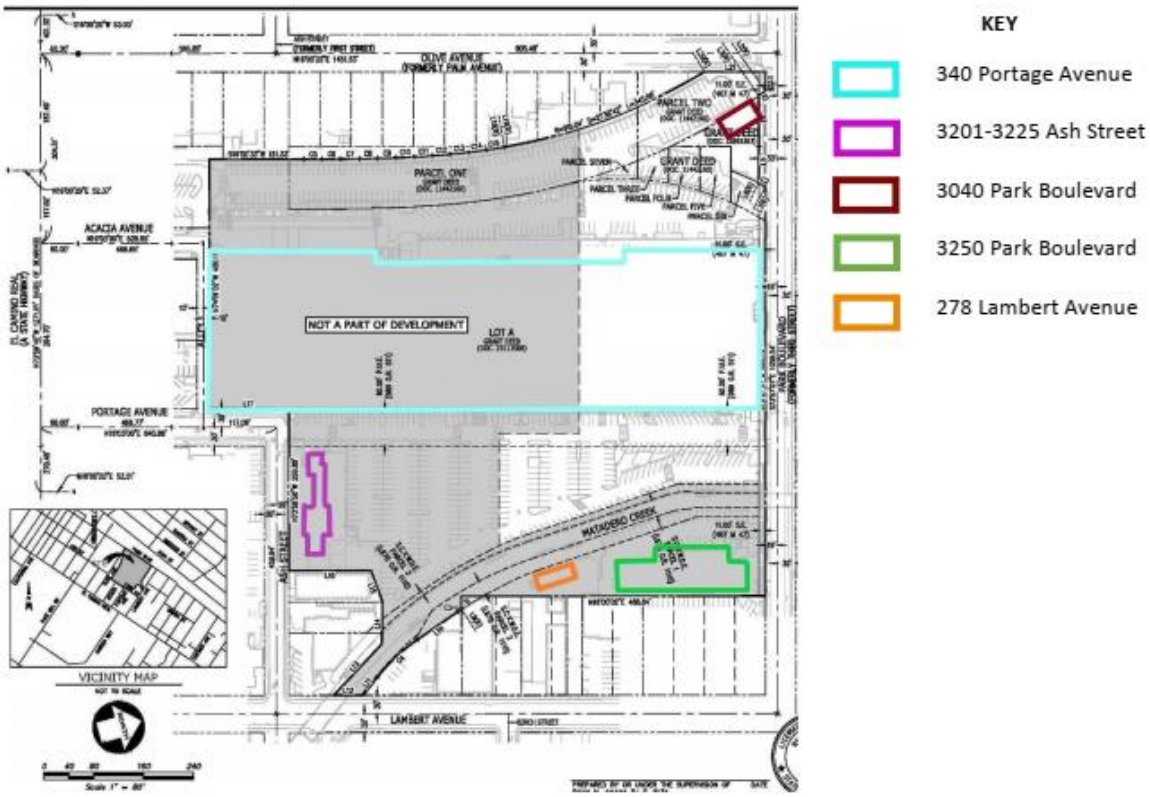
Site Visit

On September 15, 2021, Rincon Architectural Historian JulieAnn Murphy, MSHP conducted a site visit to the project site. The site visit included a detailed inspection of the buildings on the project site, which is approximately 14.27 acres and is comprised of four Santa Clara County Assessor's parcels (132-38-071, 132-32-36, 132-32-42 and 132-32-43). The survey included a visual inspection of all built environment features of the former Bayside Canning Company to document any changes since its last evaluation and confirm that it retained integrity to for listing in the CRHR at the local level under Criterion 1 (Events) for its association with the history of the canning industry in Santa Clara County. Additionally, the site visit included the visual inspection of all other buildings within the project site including buildings, structures, and associated features to assess their overall condition and integrity and to identify and document any potential character-defining features. Ms. Murphy documented the field survey using field notes and digital photographs. To confirm the potential historical resources eligibility of the commercial building at 3040 Park Boulevard the building was recorded and evaluated for listing in the National Register of Historic Places (NRHP), CRHR, and local listing on California Department of Parks and Recreation (DPR) 523 forms, which is included in Attachment 2 and summarized below.

Historical Resources Identification Findings

As discussed above, the proposed project site contains four commercial buildings and a concrete-lined creek. Two of the commercial buildings at 3250 Park Boulevard and 278 Lambert Avenue are outside the area of proposed development and do not exceed 45 years of age. They therefore were exempted from further analysis. Similarly, Matadero Creek is also outside the area of proposed development and would not be directly or indirectly impacted by the project; it therefore was also exempted from further historical resources analysis. As previously described, the former canning/warehouse building at 340 Portage Avenue and the office building located at 3201-3225 Ash Street, were previously found eligible for listing in the CRHR at the local level under Criterion 1 (Events) for their association with the history of the canning industry in Santa Clara County and are considered historical resources for the purposes of CEQA. The property is within the proposed project site and are described in more detail below. The field survey and background research also identified one historic-era building, 3040 Park Boulevard, within the project boundary and the area of proposed development that was not previously evaluated and is proposed to be demolished under the project.

Figure 7 Site Map



3040 Park Boulevard

The field survey of the project site identified one historic-era building within the project area that was not formerly evaluated. The building, 3040 Park Boulevard, is a one-story former auto garage building in the North Ventura neighborhood of Palo Alto, constructed in 1964. A full architectural description and additional historical information is presented in the attached DPR forms (Attachment 2).

Physical Description

The subject property consists of a one-story commercial building exhibiting no discernible architectural style. It is rectangular in plan, sits on a concrete foundation, and is capped with a flat roof with composition cladding. Its exterior consists alternately of stuccoed and bare structural concrete-block walls. Entrances are located on the north and east elevations and are accessed via two large vehicle entries with metal roll-up garage doors on the east and a standard-size wood-panel on the north. Windows are nonoriginal fixed multi-pane vinyl sashes. A non-original gabled open-frame shelter is attached to the south elevation. The building is in good condition with no notable alterations other than the replacement windows and south-elevation shelter (Figure 8).

Figure 8 South Elevation of 3040 Park Boulevard, View North

Site Development

The subject property was constructed as an auto service shop in 1964. Historical topographic maps and aerial photographs show that by the late 1940s, the property was an undeveloped piece of land situated between Park Boulevard and the corner of a railroad wye crossed, a location that defined the parcel's roughly triangular shape. The surrounding area was largely developed for industrial and residential uses, though several lots were not built out until the 1950s and 1960s (NETROnline 1948; 1956; 1958; 1960).

The subject address' earliest documentation, a newspaper advertisement published in 1965, identifies the property as Stan Tordeson General Tire, a dealer Gurley-Lord Tire Company automotive products. At the time, Stan Trodeson operated two such shops, the other located at 895 Emerson St. in Palo Alto (San Francisco Examiner 5/10/1965). Newspaper advertisements from 1966 indicate that Trodeson no longer owned the subject property by that time but continued to operate the Emerson Street location and had also opened an American Motors dealership at 623 Alma Street, Palo Alto (San Francisco Examiner 7/8/1966 and 11/7/1966). In addition to being a local business owner, Trodeson was involved in other business and civic ventures, including the founding of the members-only PALO Club and the construction of a Little League baseball diamond in Los Altos that was eventually named in his honor (San Francisco Examiner 12/7/1963).

The subject property has been subject to few changes. The railroad wye tracing the property's east and west boundaries was removed by 1987 (NETROnline 1982; 1987). Historical aerial photographs taken between 1965 and 2002 depict an apparent ancillary building just southeast of the subject building,

which was removed circa 2004 (UCSB 1965; NETROnline 2002; 2004). Circa 2015, wall-mounted signage reading "PARK AUTOMOTIVE" was removed from the building and by 2017 was replaced with lettering reading "Functional Lifestyles," signaling the property's conversion from an automotive services shop to a commercial fitness center. Vinyl-sash replacement windows were installed around this time as part of the building's conversion (Google Maps 2014; 2015; 2016; 2017). The gabled shelter was constructed adjacent to the south elevation circa 2019 and the wall-mounted signage replaced with the existing signage circa 2020.The subject property continues to operate as the Functional Lifestyles fitness center.

Background research, including a review of historical newspapers, city directories, and other sources, did not identify any additional information of consequence regarding the property or its former owners or occupants.

Previous Evaluations

In 2019, Page & Turnbull identified the subject property in a windshield survey as part of the Preliminary Findings of Historic Resource Eligibility in the North Ventura Coordinated Area Plan project, a planning area identified by the City of Palo Alto that is bounded by Page Mill Road, El Camino Real, Lambert Avenue, and the Caltrain tracks. Although not formally recorded and evaluated, the property was subject to preliminary research and recommended ineligible for listing in the NRHP and CRHR based on this evidence. It was also found not to be part of any historic district.

Historical Resources Evaluation

The property at 3040 Park Boulevard is not eligible for listing in the NRHP, CRHR, or as City of Palo Alto Historic Structure.

The property was constructed in the 1960s as part of Palo Alto's post-World War II-era population boom. However, it was one of many numerous buildings constructed during this period to help serve a growing population and research for this evaluation did not find the property is singularly important in the context of Palo Alto's postwar growth or in the context any other event significant to the history of the city, region, state, or nation. As such, the property is recommended ineligible under NRHP Criterion A and CRHR Criterion 1.

The person most closely associated with the property is Stan Troedson, a successful businessman and active community member. Although Troedson enjoyed some success in commerce and civic affairs, there is no evidence that his endeavors in these areas constitute significant contributions to the history of the city, region, state, or nation. Archival research also found no evidence that any subsequent owner or occupant of the property made historically significant contributions. Therefore, the property is recommended ineligible under NRHP Criterion B and CRHR Criterion 2.

Architecturally, the property is a commercial building bearing no discernible architectural style. It does not embody the distinctive characteristics of a type, period, or method of construction, or possess high artistic values. Although archival research did not identify the building's designer, its simple, functionalistic design would not exemplify the work of any master architect. Therefore, the property is recommended ineligible for listing under NRHP Criterion C and CRHR Criterion 3.

A review of available evidence and records search results did not indicate that the property may yield important information about prehistory or history. The property is therefore recommended ineligible for listing under NRHP Criterion D and CRHR Criterion 4. The property is also not recommended eligible as a contributor to any existing or potential historic districts.

Based on the above reasoning, the property is also recommended ineligible designation locally as a Historic Structure. It is not identified with the lives of historic people or with important events in the city, state or nation (Criterion 1); is not particularly representative of an architectural style or way of life important to the city, state or nation (Criterion 2); is not an example of a type of building which was once common, but is now rare (Criterion 3); and is not connected with a business or use which was once common, but is now rare (Criterion 4). In addition, research conducted for this study did not find that the building's architect or building itself was important (Criterion 5). Finally, the property does not possess elements demonstrating outstanding attention to architectural design, detail, materials or craftsmanship (Criterion 6).

340 Portage Avenue

Physical Description

The former cannery/warehouse building at 340 Portage Avenue is the result of an accretion of additions for use as a packing and warehouse facility and is comprised of approximately 10 sections that are attached to one another, with some earlier additions having been completely enveloped in later additions. The parcel also includes a c. 1930s former office building at the southeast corner of the of the site at 3201-3225 Ash Avenue. Since that time, the former cannery/warehouse facility served a number of commercial uses and is presently partially vacant. The former office building has been leased by other businesses. The buildings are in good condition.

Figure 9 South Elevation of the former canning/warehouse building at 340 Portage Avenue

Figure 10 Primary Elevation of the former office building at 3201-3225 Ash Avenue

Site Development

As outlined in the historical resources evaluation prepared by Page & Turnbull, the site was largely undeveloped prior to the first decades of the twentieth century. It was first developed in April 1918 by Thomas Foon Chew, a Chinese immigrant and owner of the Bayside Canning Company in Alviso. Chew planned to, according to articles published in the local Daily Palo Alto newspaper, build a second canning plant on the site and construction began in June of that year. By the following year Chew was expanding his operations and added nineteen houses for workers south of the cannery, and a large warehouse was added. To the south of the preparing facility, there was a loading platform and small syrup room. Four small outbuildings, including a restroom and office, were located to the southeast of these buildings. A scale was situated along Portage Avenue, and an in-ground oil tank was located alongside the railroad spur. A separate one-story dwelling and small outbuilding were located to the north of the cannery, facing Third Street.

Over the next several decades, the canning complex continued to expand. Records of historic building permits at the Palo Alto Historical Association reveal that in 1929, the Sutter Packing Company, which by then operated the cannery although it continued to be owned by Thomas Foon Chew, had received a permit to build another warehouse on the site at 310 Portage Avenue. A permit to build yet another cannery building, this time at 300 Portage Avenue, was issued in 1937. Just three years later in 1940, the Sutter Packing Company received another permit on a warehouse expansion at 380 Portage Avenue; however, newspaper articles show that construction work at the site was much more extensive. In June 1940, The Palo Alto Times reported that the company was planning on improvements to the canning plant that would result in 50,000 square feet of additional storage and increase the plant's capacity 25 to 30 percent.

The cannery continued to grow as production ramped up in response to World War II. In 1942, Sutter Packing Company was issued a permit to build a warehouse at 300 Portage Avenue. This building is likely the southernmost portion of the existing building that extends across Ash Street over the site of the last row of employee cabins. In 1945, additional improvements took place at the cannery. Work included:

- Building a 42.5 x 70-foot jam and jelly housing facility;

- Converting a loading platform into an office building and laboratory near Second Street;
- Constructing of a shed over the loading platform near Third Street;
- Adding a one-story office building on Portage Avenue near First Street; and
- Repairing the roof.

In spite of decades of nearly constant activity and expansion of the operations at the cannery site, Sutter Packing Company went into decline after World War II and finally closed its doors in 1949. A portion the larger cannery complex on Lambert Avenue was initially leased to Coca-Cola to function as a bottling plant, but records do not confirm Coca-Cola's presence at the subject property. By the 1960s, the former cannery had been subdivided into several smaller spaces, which were leased to a variety of tenants. In 1964, the Southern Pacific Railroad removed its spur tracks from the site. The same year, a portion of the building was occupied by Maximart, a large commercial store that sold home goods and appliances. By 1978, Maximart had moved out, and the site was under the ownership of WSP Properties. Since that time, the buildings have been leased for a number of commercial uses, including a Fry's Electronics which occupied a portion of the warehouse space until closing in 2019.

Historical Resources Evaluation

340 Portage Avenue and the associated office building were previously recorded and evaluated for historic significance for the City of Palo Alto by Page & Turnbull, Inc. and found eligible for listing in the CRHR. The site's significance was described in the Page & Turnbull evaluation as follows:

> 340 Portage Avenue and the associated former office building to the southeast appear to be individually significant under Criterion 1 in association with historical events important to the history of Palo Alto. Agricultural industries, including fruit and vegetable canning, were once the dominant industries in Santa Clara County. The oldest portions of the cannery building, itself, were constructed in 1918 for the Bayside Canning Company, which was owned by Chinese immigrant and prominent canning mogul, Thomas Foon Chew. Under Chew, the Bayside Canning Company rose to become the third largest fruit and vegetable cannery in the world in the 1920s, behind only Libby and Del Monte.
>
> After Chew's death, the cannery was subsequently purchased and operated for more than twenty years by the Sutter Packing Company, another fruit and vegetable cannery. The Sutter Packing Company significantly expanded the cannery building and its operations throughout the 1930s and 1940s as it prepared for and raced to meet the demands of World War II. The expansion projects included the construction of the extant office building at 3201-3225 Ash Street to the southeast of cannery building at 340 Portage Avenue. For a time, the cannery was the largest employer in the Mid Peninsula, and when it closed in 1949, it was the largest employer in Palo Alto. The trajectory of canning operations at the plant —which began in the early twentieth century, peaked in the 1920s, increased production to meet the demands of World War II, and then quickly declined as residential development and new industries began to replace agricultural industries in the postwar period— corresponds closely to the broad pattern of the history of the canning industry in Santa Clara County.
>
> The building is a rare surviving example of Palo Alto's and Santa Clara County's agricultural past. As a result, the building at 340 Portage Avenue does appear to be individually significant at the local level under Criterion 1. The period of significance under this criterion begins in 1918, when canning operations began at the site under the Bayside Canning Company, and ends in 1949, when the Sutter Packing Company's canning operations at the building ended.

Character-Defining Features Analysis

Page & Turnbull, Inc., in their historic resource evaluation, also assessed the character-defining features of 340 Portage Avenue, which are those physical features which collectively convey the significance of the property and is tied to its association with the history of canning in Santa Clara County (CRHR Criterion 1). The character-defining features therefore relate to its history as an operating canning facility and warehouse and are presented in Table 1.

Table 1 Character-Defining Features – 340 Portage

Form and Massing (long, linear massing; composition of multiple smaller buildings; primarily one-story, double-height volumes with taller central cannery section)

Varied roof forms and structures (prominent paired monitor roofs; arched roofs; visible gabled roofs)

Exterior wall materials (reinforced board-form concrete; corrugated metal cladding)

Exterior cannery features (concrete loading platforms; cooling porch at rear of building; exterior shed awnings with wood post-and-beam construction)

Fenestration (wood frame windows; garage door openings; wire glass skylights over former warehouses)

Landscape features (preserved path of removed railroad track, represented in the shape of the parking lot pavement and following the channel of Matadero Creek)

Interior Features (exposed wood truss ceiling; wood and concrete post-and-beam construction)
Photo Source: Page & Turnbull, 2019

Rincon Consultants, Inc., 2021

Project Impacts

As detailed above in the historical resources identification findings, the project site contains four commercial buildings and a concrete-lined creek. The existing buildings at the southeast corner of the site, 3250 Park Boulevard and 278 Lambert Avenue, have not reached and age of eligibility and, therefore, do not qualify as historical resources for the purposes of CEQA. Furthermore, both buildings are outside of the area of proposed development. Matadero Creek is also outside the area of proposed development. Furthermore, it was lined with concrete in 1994 and has not reached the age of eligibility to qualify as a historical resource. As detailed above, 3040 Park Boulevard is recommended ineligible for listing in the NRHP, CRHR, or local designation. As such, it does not qualify as a historical resource and its demolition would not result in a significant adverse impact as defined by Section 15064.5 of the CEQA Guidelines.

340 Portage Avenue and the associated office building with a listed address of 3201-3225 Ash Avenue have been found eligible for listing in the CRHR under Criterion 1 for significant associations with the canning industry in Santa Clara County; as such the property is considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. To support the development of 91 new residential units within 16 three-story buildings, the project includes the demolition of the eastern portion of the existing warehouse building. In addition, the project would rehabilitate small portion of the building just east of the centerline of the former cannery/warehouse building. The remaining portions of the former cannery/warehouse building, as well as the associated office building 3201-3225 Ash Avenue are outside the area of proposed development and are not otherwise included in the proposed project actions.

Pursuant to Section 10564.5(b) of the CEQA guidelines a project may result in substantial adverse change in the significance of a historical resource if it causes physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Material impairment is defined as demolition or alteration "in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the [CRHR]."[3]

Additional guidance on assessing impacts to historical resources is defined in Section 15064.5(b)(3) of the CEQA Guidelines, states that impacts to historical resources are generally considered mitigated to a less than significant level when they meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards) (Attachment 3). The Secretary's Standards establish professional standards and provide guidance on the preservation and protection of historic properties. The intent of the Secretary's Standards is to provide for the long-term preservation of a property's significance through the preservation of its historic materials and features. These historic materials and features are commonly referred to as character-defining features and are indispensable in a historic property's ability to convey the reasons for its historical significance. The Bayside Canning Company's character-defining features were assessed by Page & Turnbull in their historic resource evaluation, as outlined above. To ensure a proposed project's compliance with the Secretary's Standards, a historic property's character-defining features should therefore be identified and preserved as part of the final design.

In consideration of impacts to the 340 Portage Avenue property, the most substantial impact would occur through the demolition of 89,639 square-feet of the eastern portion of the Bayside Canning Company canning/warehouse building, constituting a loss of approximately 40 percent of the building. The proposed demolition would result in the removal of distinctive materials, the loss of several

[3] CEQA Guidelines Section 15064.5[b][2][A].

character-defining features, and would, therefore constitute material impairment to the historical resource. The proposed demolition would be in an adverse manner of those characteristics of the historical resource that convey its historical significance and justify its eligibility for listing in the CRHR. Additionally, the proposed treatment of the building would not be consistent with the Secretary's Standards which recommends avoiding loss of historic materials through demolition and removal and encourages the retention of distinctive materials that characterize a property. The proposed would cause a loss of several of the the property's character-defining features outlined above, including its form and masing and varied roof forms and structures through the proposed demolition. Additionally, the treatment proposed for the portion of the building that is to remain and be rehabilitated for continued use also does not meet the Standards. That Standards provide that the removal of distinctive materials should be avoided, alterations should not destroy historic materials, and that deteriorated features should be repaired or replaced in kind, where necessary. The proposed project includes the removal of distinctive materials like the character-defining exterior cannery features such as the loading platforms and cooling porches. The proposed changes to the building's fenestration, most notably the addition of new window openings and the alterations to the entrances on the north and south elevations also do not meet the Standards. The addition of the proposed aluminum canopies above the entries and the proposed addition to the warehouse's south elevation are not compatible with the warehouse's historic character and would obscure historic materials that characterize the property and is, therefore, inconsistent with the Standards.

Additionally, the proposed bisection of the canning/warehouse building would result in unknown and undefined treatment of a substantial portion of the building. The unidentified treatment of the remaining portion of the warehouse building could result in additional material impairment. Furthermore, the proposed demolition of the portion of the building included in project site would impair the building's physical characteristics that convey the property's historical significance such that the historic resource would not retain sufficient integrity for listing.

The goals of rehabilitation are to make possible the compatible new use of a historic property while preserving those portions or features that convey its historical, cultural, or architectural values. The project, as proposed, would result in material impairment to the resource and would not preserve the building's historical value. The proposed project would result in substantial changes to the historic canning/warehouse building and would destroy distinctive materials, features, and spatial relationships that define its historic character. The partial demolition of the building and the proposed exterior updates would result in the removal of distinctive building materials. Finally, the proposed new additions and adjacent construction are proposed in a manner that requires the demolition of part of the historic building. If the proposed new construction were removed in the future, the essential form and integrity of the historic building and its environment would be impaired and would not, therefore, meet the Standards. The proposed partial redevelopment of the warehouse building fails to meet the Standards for the reasons outlined above. The project as proposed would result in ***significant impact to a historical resource for the purposes of CEQA.***

Recommendations

To inform the alternatives analysis for CEQA compliance and identify measures to mitigate potential impacts, Rincon has provided the following recommendations.

In order to meet the Standards, thereby avoiding a substantial adverse change in the significance of a historical resource, the project would have to be redesigned to avoid subdivision of the historic resources on separate parcels as well as the partial demolition of the historic resource at 340 Portage

Avenue. The buildings could be rehabilitated for a new use that would require minimal change to their distinctive features. For a successful rehabilitation, the design would have to retain the building's character-defining features, as previously outlined.

The project may also be revised to mitigate the substantial adverse change. Mitigation of significant impacts must lessen or eliminate the physical impact the project will have on the historical resource. Mitigation could be accomplished through the redesign of the project to eliminate the proposed partial demolition of the historic resource while accommodating the proposed development on the portion of the site that is not currently occupied by buildings.

Alternatively, the project could proceed largely as designed to retain more of the warehouse building's character-defining features to continue to convey its historic context, in part. Revisions could include design updates that would more closely align with the Standards. The revised design could avoid the addition proposed for the south elevation and instead of introducing new storefront entries, reuse historic entries. It would also be more successful in aligning with the Standards if it retained the loading platforms and cooling porches instead of continuing the building elevations to grade and introducing aluminum canopies. The building would further comply with the Standards through avoiding adding aluminum frame windows in favor of wood or wood clad construction in the historic fenestration. The recommended changes, however, would not mitigate the impacts below a level of significance.

Another mitigation option is to carryout Historic American Building Survey (HABS) level documentation of the site. HABS documentation could include archival copies of historical building plans, if available and photos of all the buildings and site. Similar to the scope outlined above, site documentation would not mitigate the impacts below a level of significance.

The proposed project could be designed to include a permanent, high-quality on-site interpretive display in a publicly-accessible location, preferably near or within a portion of the retained warehouse building. The display could focus on the property's history, particularly the agricultural past of Santa Clara County and the canning operations of Bayside Canning Company. The interpretive display should be prepared by a professional exhibit designer and historian; historic information contained in Page & Turnbull's HRE can serve as the basis for the interpretive display. The goal of the interpretive display would be to educate the public about the property's historic themes and associations within broader cultural contexts. The interpretive design could incorporate elements of public art. The recommended mitigation, however, would not mitigate the impacts below a level of significance.

Conclusions

The field survey and archival research conducted for this study identified three properties over 45 years of age within the project area, the former Bayside Canning Company canning/warehouse building at 340 Portage Avenue, its associated office building at 3201-3225 Ash Street (APN 132-38-071), and a commercial building at 3040 Park Boulevard (APN 132-32-036). The project site also contains the concrete-lined Matadero Creek and two one-story office buildings on the east side of the creek at 3250 Park Boulevard and 278 Lambert Avenue, all of which were determined to not meet the age threshold generally triggering the need for historical resources evaluation were not recorded as part of this study. The two other parcels included in the project do not contain buildings (APNs 132-32-042 and 132-32-043). In 2019, the canning/warehouse building and its associated office building were determined eligible for listing in the CRHR at the local level under Criterion 1 (Events) for its association with the history of the canning industry in Santa Clara County. Therefore, the buildings are considered historical

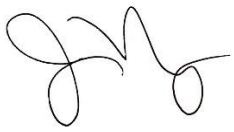
resources as defined in Section 15064.5(a) of the CEQA Guidelines.[4] As a part of this study, the building at 3040 Park Boulevard was evaluated for its potential historic significance and found to be ineligible for listing and is not considered a historical resource for the purposes of CEQA.

The proposed project involves the subdivision and merger of four existing parcels into two parcels – one for the development of 91 townhomes and a remainder lot that is not part of the proposed development. Work proposed on the project parcel includes the partial demolition of the canning/warehouse building and updates to the remaining portion of the building for use as common space. As detailed above, this impacts analysis finds that the project would result in the material impairment to a historical resource and result in a substantial adverse change in the significance of a resource. Furthermore, it does not comply with the Secretary's Standards and as proposed and would result in a ***significant impact to a historical resource for the purposes of CEQA.***

The recommendations above provide guidance for the project to meet the Standards thereby reducing the impacts to less than significant levels. Alternatively, it provides a suite of mitigation measures that would mitigate the project's impacts to the historic resources, but would not mitigate said impacts to below a level of significance.

Should you have any questions or comments regarding this report, please do not hesitate to contact the undersigned at 925-326-1159 or at jmuprhy@rinconconsultants.com.

Sincerely,
Rincon Consultants, Inc.



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Senior Architectural Historian

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KTGY Architecture and Planning

2021 200 Portage Avenue Townhomes, August 3.

[4] Page & Turnbull, Inc. *Historic Resource Evaluation for 340 Portage Avenue,* prepared for the City of Palo Alto*,* February 26, 2019.

Page & Turnbull

2019 *Historic Resource Evaluation for 340 Portage Avenue,* prepared for the City of Palo Alto*,* February 26.

2019 *Memo: NVCAP Windshield Survey and Preliminary Historic Resource Eligibility Analysis,* April 11.

The Sobrato Organization

2021 *200 Portage Avenue, Palo Alto, CA 94306,* June 16.

WRA Environmental Consultants

2020 Matadero Creek Renaturalization: Conceptual Alternative Analysis. Prepared for the City of Palo Alto, September.

Attachments

Attachment 1 Page & Turnbull*Historic Resource Evaluation for 340 Portage Avenue*

Attachment 1 DPR Forms for 3040 Park Boulevard

Attachment 2 Secretary of the Interior's Standards

Attachment 2

Historic Design Guidelines Memorandum

Architectural Resources Group

HISTORIC DESIGN GUIDELINES
340 Portage Avenue, Palo Alto
Revised, July 2022

Introduction
At the request of the Sobrato Organization, Architectural Resources Group (ARG) has prepared the following guidelines regarding the future treatment of the property at 340 Portage Avenue in Palo Alto, California. As documented in the Historic Resource Evaluation (HRE) that the City of Palo Alto had completed for the property in April 2019, 340 Portage Avenue is considered historically significant as the former home of the Bayside Canning Company and Sutter Canning Company, an association that extended from the original 1918 construction of portions of the property until Sutter's departure in 1949. The property was not found to be architecturally significant. The purpose of the guidelines is to foster rehabilitation and redevelopment of the site in a manner that retains the property's identified historic character and is in keeping with the Secretary of the Interior's Standards for Rehabilitation. The guidelines are intended to ultimately be incorporated into the Development Agreement (DA) associated with the property.

To complete these guidelines, ARG conducted a site visit of the property on March 9, 2022 to note and photograph current features and conditions. ARG also met with representatives of the Sobrato Organization and project architect Architectural Technologies (ARC TEC) to gain a sense of the future redevelopment of the site, the design of which is still under development. The drawings and renderings that illustrate the guidelines were taken from materials that ARC TEC submitted to ARG in June 2022.

Sutter Packing Plant, 1940, looking northwest (Palo Alto Historical Society, 022-050).

Preliminary project rendering, south and east façades (ARC TEC, "340 Portage Avenue," July 26, 2022).

Preliminary project rendering, east and north façades (ARC TEC, "340 Portage Avenue," July 26, 2022).

Project Summary
The subject building extends southwesterly from Park Boulevard in the North Venture Coordinated Area Plan (NVCAP) area of Palo Alto. ARG's understanding is that the future redevelopment of the property will generally consist of the following components:

- 200 Portage Avenue: The portion of the building closest to Park Boulevard will be removed, exposing the east elevation of the 340 Portage Avenue portion of the building.
- 340 Portage Avenue: The monitor roofed bays at the building's east end will be retained and rehabilitated; the portion of the building to the west of those bays will be rebuilt within the existing footprint.
- 380 Portage Avenue: The westernmost portion of the building, which is clad in board formed concrete and features bow truss roofs, is included in the current project site but currently includes no proposed exterior improvements.
- 3201-3225 Ash Street: No exterior improvements are proposed to this portion of the property.
- New construction: Approximately 74 townhomes will be added to the eastern half of the project site, along Park Boulevard in place of 200 Portage Avenue and the parking lot to the north.

These historic design guidelines focus on the exterior treatment of the 340 Portage Avenue portion of the site, with special attention to the monitor roofed bays at the building's eastern end, which are the most visually prominent historic features on the site.

Character-defining Features
A *character-defining feature* is an aspect of a building's design, construction, or detail that is representative of the building's function, type, or architectural style.[1] Generally, character-defining features include specific building systems, architectural ornament, construction details, massing, materials, craftsmanship, site characteristics and landscaping within the period of significance. An understanding of a building's character-defining features is a crucial step in developing a rehabilitation plan that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* by incorporating an appropriate level of restoration, rehabilitation, maintenance, and protection.

In April 2019, the City of Palo Alto commissioned Page & Turnbull to complete a Historic Resource Evaluation (HRE) for 340 Portage Avenue that identified the following character-defining features for the property:

- Form and massing
  - Long, linear massing
  - Composition of multiple smaller buildings
  - Primarily one-story, double-height volumes with taller central cannery section
- Varied roof forms and structures
  - Prominent paired monitor roofs
  - Arched roofs
  - Visible gabled roofs

- Exterior wall materials

[1] Nelson, Lee H. *Architectural Character: Identifying the Visual Aspects of Historic Buildings As an Aid to Preserving Their Character*. Washington, D.C: Technical Preservation Services, National Park Service, U.S. Dept. of the Interior, 1988, 1.

  - Reinforced, board formed concrete
  - Corrugated metal cladding
- Exterior cannery features
  - Concrete loading platforms
  - Cooling porch at rear of building
  - Exterior shed awnings with wood post-and-beam construction
- Fenestration
  - Wood frame windows
  - Garage door openings
  - Wire glass skylights over former warehouses
- Landscape Features
  - Preserved curved path of the removed railroad spur tracks, represented in shape of parking lot pavement
  - Channel of Matadero Creek
- Interior features
  - Exposed wood truss ceilings
  - Wood and concrete post and beam construction
  - Concrete floors

Careful consideration of these identified features informed the development of the following historic design guidelines.

Historic Design Guidelines

In general, the approach to rehabilitating 340 Portage Avenue should maintain the building's character-defining features to the extent feasible in maintaining and continuing the property's office and research and development (R&D) uses. The following guidelines address specific aspects of the project design.

Height and Bulk

The building's long, linear massing should be maintained.

On the south elevation, new construction should remain at or below the top of the existing parapet height.

On the north elevation, where a new slightly higher parapet is proposed, both the new parapet and any new construction should remain below the height of the outermost edge of the monitor roofs.

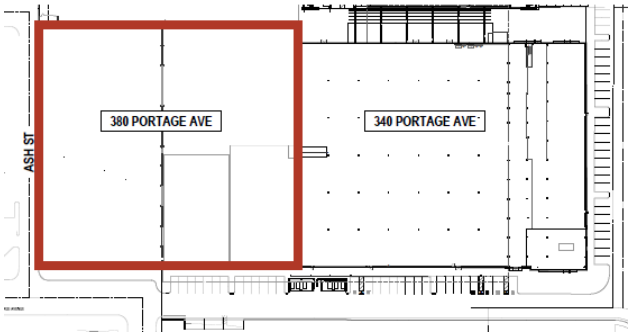
Continuous lot frontage along the north and south elevations should generally be maintained, with possible small-scale deviations to accommodate slightly recessed or projecting entry bays.

Roof Forms

The monitor roof forms should be maintained. Other roofs should remain invisible behind the parapet walls along the north and south elevations.

New rooftop mechanical units should be kept below the parapet line where feasible. Where infeasible, rooftop mechanical units should situated toward the center of building footprint in order to minimize visibility from the public right-of-way.

The bow truss roof forms in the western half of the building should be retained.



Cladding

The following wall cladding materials are encouraged as being compatible with the historic character of the existing building: metal panels, corrugated metal (painted or unpainted), and metal screens. In addition, board formed concrete is appropriate at the westernmost portion of the building, which is currently clad in board formed concrete.
The following wall cladding materials are discouraged: wood, masonry, and ceramic tile.

Fenestration

A window condition assessment should be completed to identify the location and condition of extant (1) wire glass skylights and (2) clerestory monitor windows in the monitor roof portion of the building. This assessment should be completed with the assistance of one or more professionals meeting the Secretary of the Interior's Professional Qualification Standards in Historic Architecture. Historic windows and skylights should be repaired if feasible.

If the extant clerestory monitor windows are too deteriorated to repair, or occupy less than half of the extant window openings, new windows that are similar in scale, profile and appearance of the original windows should be installed. Wood or metal/aluminum windows that mimic the thickness and muntin pattern of the historic wood windows is encouraged; use of vinyl windows is discouraged.

New fenestration elsewhere on the building (including the east elevation and the areas on the north and south elevations immediately below the monitor roofs) should be metal or aluminum windows with simple surrounds, befitting the industrial history of the property.

Entries and Canopies

New entries should consist of simple aluminum storefront assemblies with full-height sidelights. The entry to the retail space on the south elevation should be similar in design to entries elsewhere in the building.

Canopies at the north and south elevations should be thin and metal-clad, either cantilevered out from the building or supported from above by tension cables or from below by simple metal brackets.

Retaining portions of the existing shed awnings with post-and-beam construction should be considered.

Interior

New interior construction should be configured in such a manner that the original volume of the roof monitor portion of the building is still conveyed; wholly subdividing that portion of the building into smaller spaces or introducing intermediate floors should be avoided.

At the new retail space on the south elevation, interior skylights should be incorporated to afford views of the historic monitor roofs. Lighting conditions in the retail space and at the monitor roofs should be investigated to ensure the visibility of the roof elements through the skylights.

Public Exhibit

The site should incorporate a publicly accessible display featuring historic photos of the property and a description of its historical significance arrayed onto as many as four panels. The content of the panels could be adapted from the recently completed HRE.

This display panel, which should be composed of durable materials, should be developed with the assistance of one or more professionals meeting the Secretary of the Interior's Professional Qualification Standards in Architectural History or History and experienced in creating such historical exhibits.

For ease of installation and maintenance, we recommend the display panel(s) be located inside the retail space at the south end of the monitor roof portion of the building. This could be supplemented by a commemorative plaque, placed on the building exterior, that indicates the property is the former home of the Bayside Caning Company and Sutter Canning Company.

Attachment 3

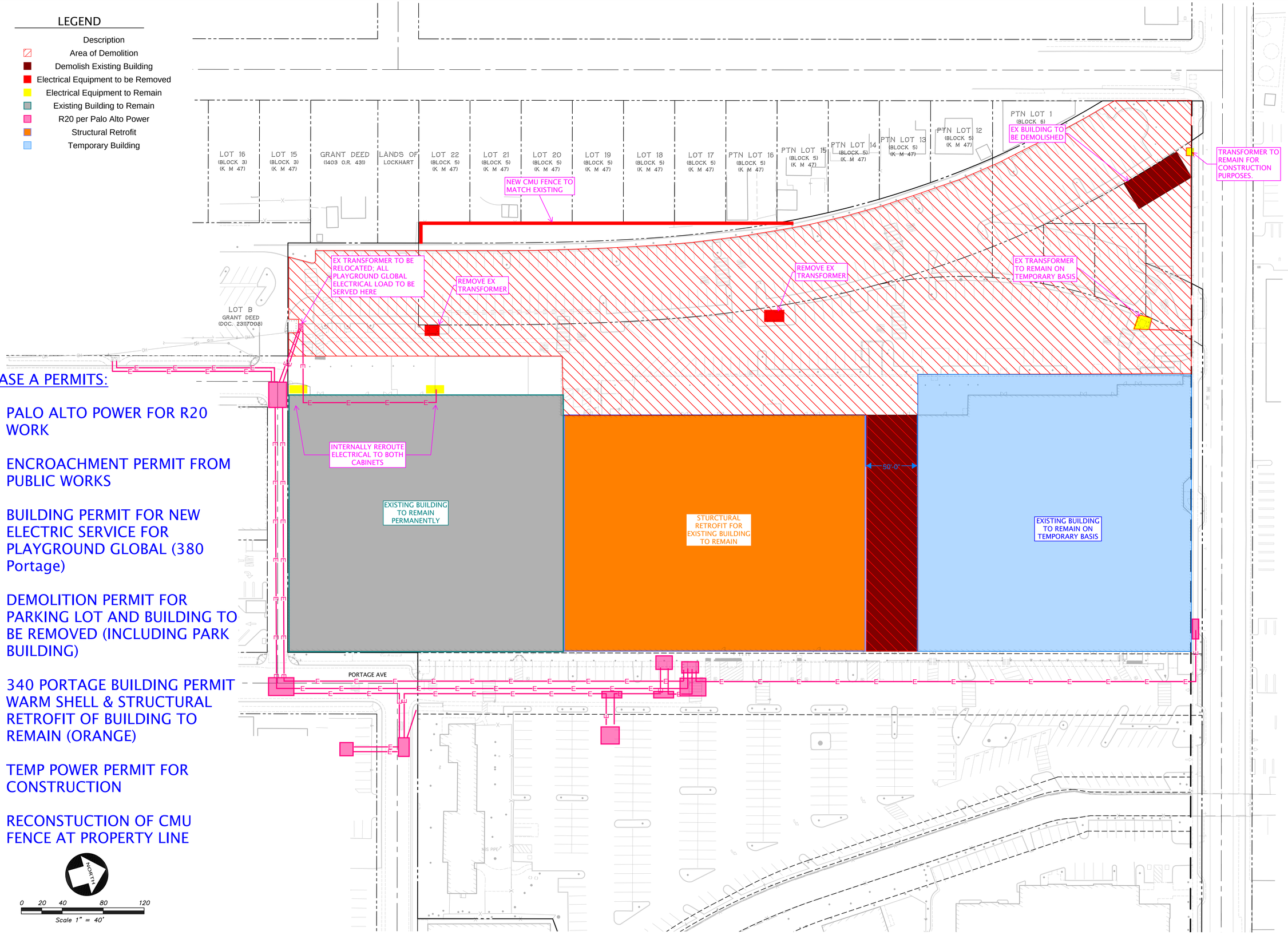
Applicant Phasing Plan

Attachment 4

Summary Table of Recommendations

LEGEND

Description
Area of Demolition
Demolish Existing Building
Electrical Equipment to be Removed
Electrical Equipment to Remain
Existing Building to Remain
R20 per Palo Alto Power
Structural Retrofit
Temporary Building



PHASE A PERMITS:

1. PALO ALTO POWER FOR R20 WORK
2. ENCROACHMENT PERMIT FROM PUBLIC WORKS
3. BUILDING PERMIT FOR NEW ELECTRIC SERVICE FOR PLAYGROUND GLOBAL (380 Portage)
4. DEMOLITION PERMIT FOR PARKING LOT AND BUILDING TO BE REMOVED (INCLUDING PARK BUILDING)
5. 340 PORTAGE BUILDING PERMIT WARM SHELL & STRUCTURAL RETROFIT OF BUILDING TO REMAIN (ORANGE)
6. TEMP POWER PERMIT FOR CONSTRUCTION
7. RECONSTUCTION OF CMU FENCE AT PROPERTY LINE

NORTH

0 20 40 80 120

Scale 1" = 40'

NO.	BY	REVISION

NO.	BY	REVISION

KIER+WRIGHT
3350 Scott Boulevard, Building 22 Phone: (408) 727-6665
Santa Clara, California 95054 www.kierwright.com

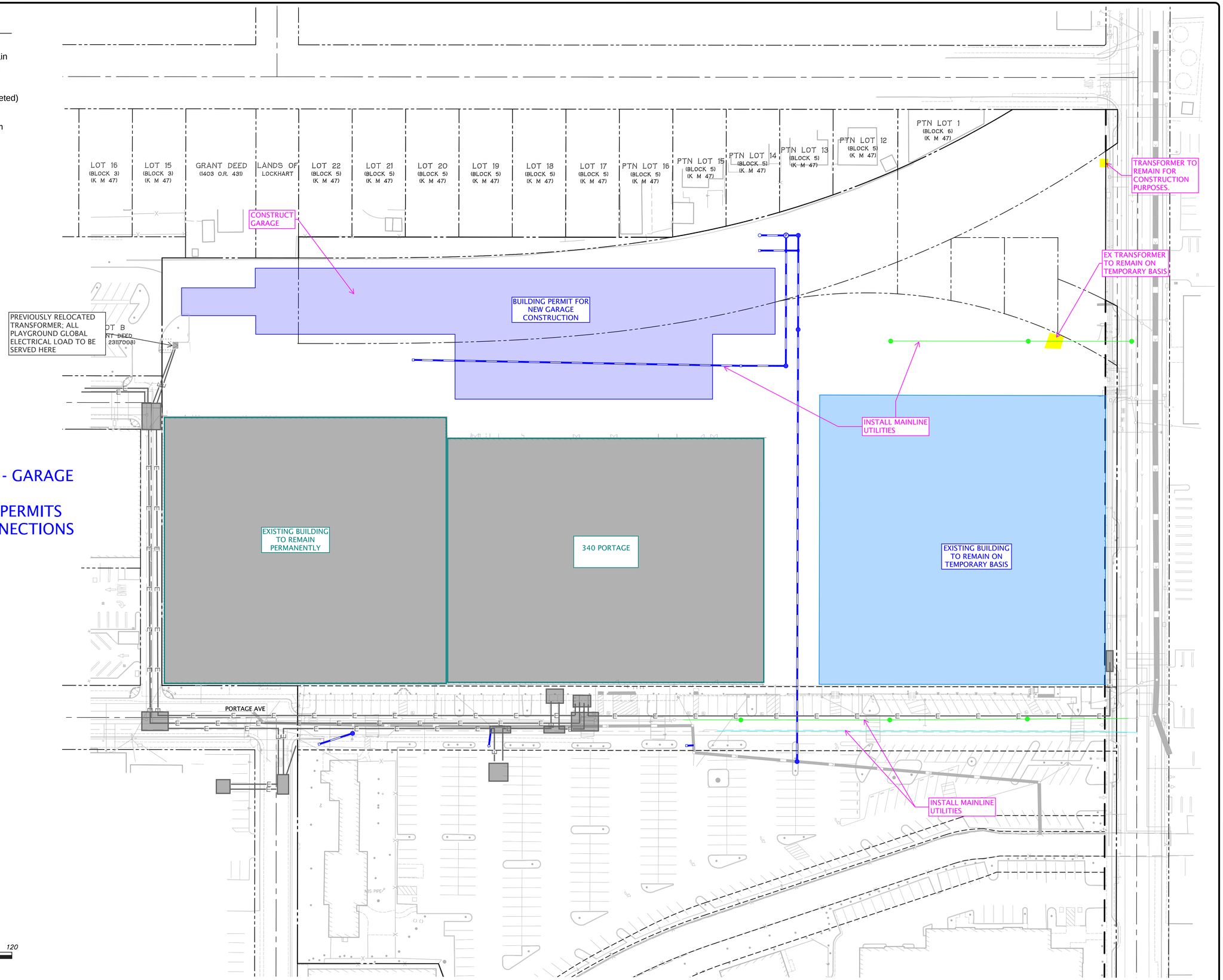
PHASE A OF PORTAGE AVENUE PHASING PLAN FOR THE SOBRATO ORGANIZATION

PALO ALTO, CALIFORNIA

DATE	NOV 2022
SCALE	AS SHOWN
DESIGNER	NM
DRAWN BY	MC
JOB NO.	A10128-6
SHEET	----

LEGEND

Description
Electrical Equipment to Remain
Existing Building to Remain
Garage Limits
R20 per Palo Alto Power (completed)
Temporary Building
Proposed Storm Drain Main
Proposed Sewer Main
Proposed Water Main



PHASE B PERMITS:

1. BUILDING PERMIT - GARAGE
2. ENCROACHMENT PERMITS FOR UTILITY CONNECTIONS

NORTH

0 20 40 80 120

Scale 1" = 40'

BY	NO.	REVISION

BY	NO.	REVISION

KIER+WRIGHT

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Santa Clara, California 95054 www.kierwright.com

PHASE B OF PORTAGE AVENUE PHASING PLAN FOR THE SOBRATO ORGANIZATION

PALO ALTO, CALIFORNIA

DATE	NOV 2022
SCALE	AS SHOWN
DESIGNER	NM
DRAWN BY	MC
JOB NO.	A10128-6
SHEET	----

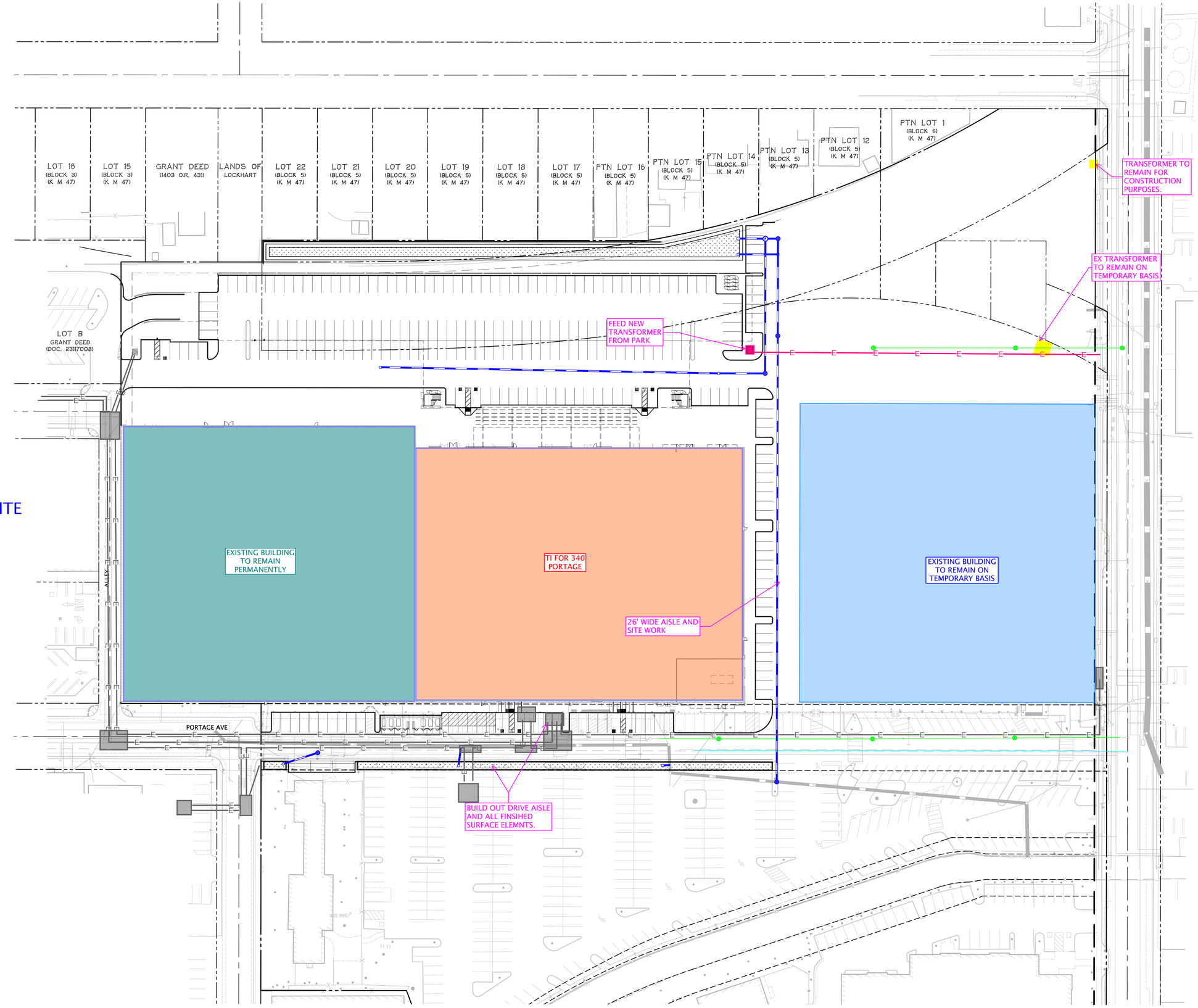
LEGEND

Description

- Electrical Equipment to Remain
- Existing Building to Remain
- New Electrical Equipment
- Temporary Building
- TI for 340 Portage
- Proposed Storm Drain Main
- Proposed Sewer Main
- Proposed Water Main

PHASE C PERMITS:

1. GRADING PERMIT FOR SITE WORK
2. TI FOR 340 PORTAGE



NO.	REVISION	BY

NO.	REVISION	BY

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Santa Clara, California 95054 www.kierwright.com

PHASE C OF PORTAGE AVENUE PHASING PLAN FOR THE SOBRATO ORGANIZATION

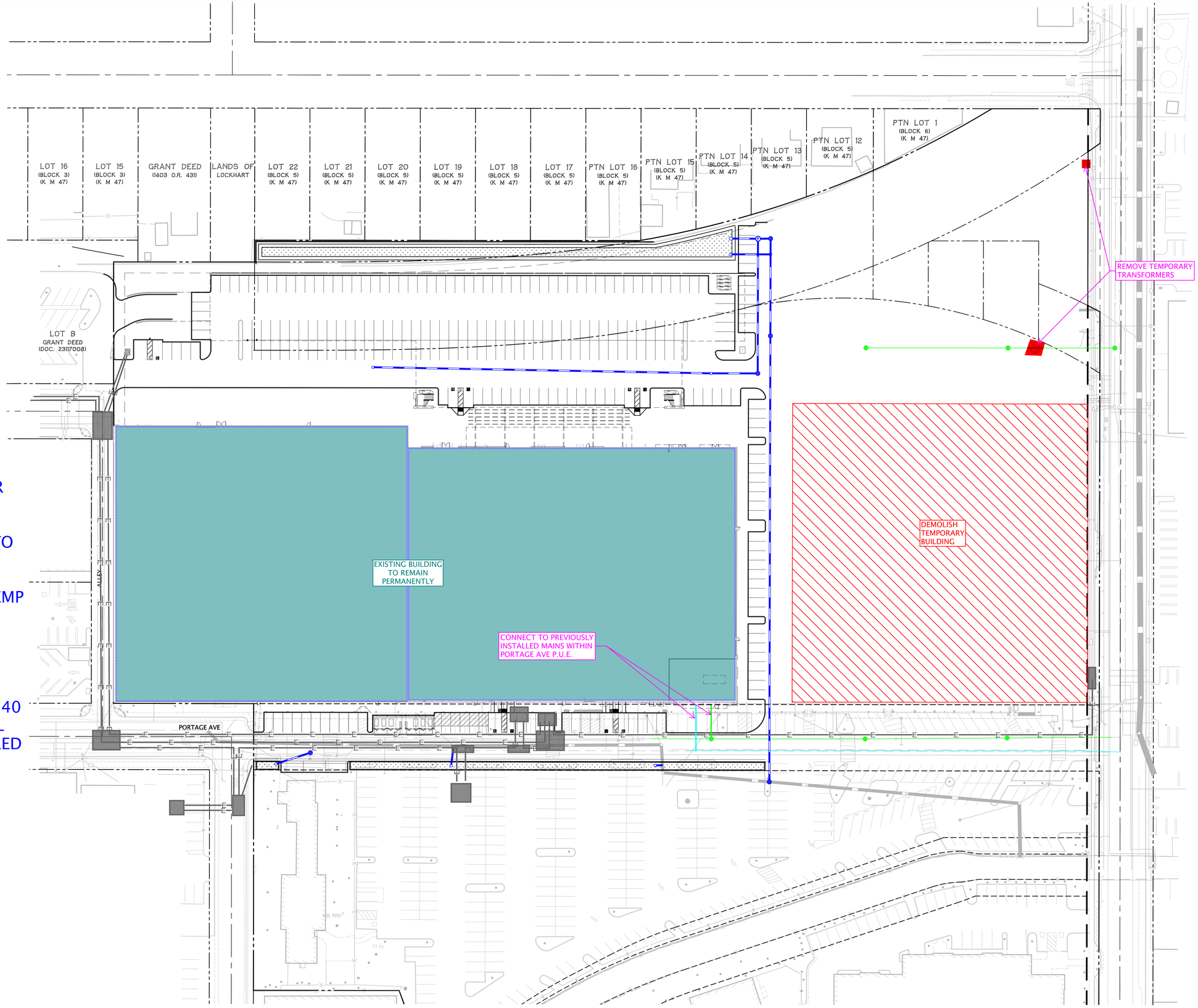
PALO ALTO, CALIFORNIA

DATE	NOV 2022
SCALE	AS SHOWN
DESIGNER	NM
DRAWN BY	MC
JOB NO.	A10128-6
SHEET	----

LEGEND

Description

- Electrical Equipment to be Removed
- Limits of Demolition
- Proposed Storm Drain Main
- Proposed Sewer Main
- Proposed Water Main



PHASE D PERMITS:

1. DEMOLITION PERMIT FOR TEMP BUILDING
2. UTILITY CONNECTIONS TO 340 PORTAGE
3. GRADING PERMIT FOR TEMP BUILDING TO BE DEMOLISHED
4. UPON CERTIFICATE OF OCCUPANCY FOR THE GARAGE AND TCO FOR 340 PORTAGE, RECORD FINAL MAP & MAKE ALL REQUIRED DEDICATIONS

NO.	REVISION	BY

NO.	REVISION	BY

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PHASE D OF PORTAGE AVENUE PHASING PLAN FOR THE SOBRATO ORGANIZATION

PALO ALTO, CALIFORNIA

DATE	NOV 2022
SCALE	AS SHOWN
DESIGNER	NM
DRAWN BY	MC
JOB NO.	A10128-6
SHEET	----

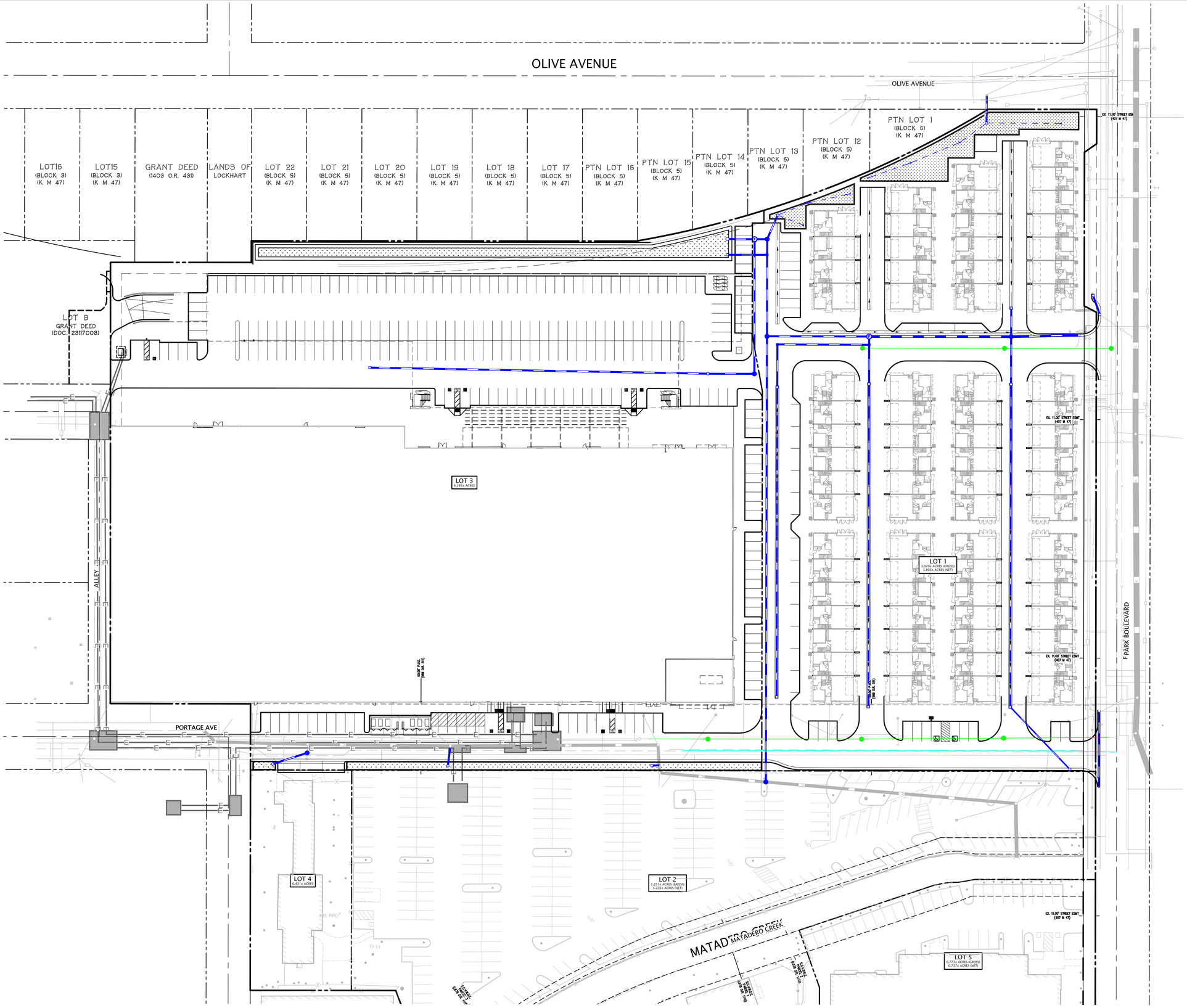
LEGEND

Description

- R20 per Palo Alto Power
- Proposed Storm Drain Main
- Proposed Sewer Main
- Proposed Water Main

PHASE E PERMITS:

1. TOWNHOME PERMITS & CONSTRUCTION



NORTH

0 20 40 80 120

Scale 1" = 40'

NO.	REVISION	BY

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PALO ALTO, CALIFORNIA

DATE	NOV 2022
SCALE	AS SHOWN
DESIGNER	NM
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JOB NO.	A10128-6
SHEET	----

Table 1 Summary Table of Recommendations

Design Element	SOIS Analysis	Recommendations
Proposed Demolition	Does not meet Standard 1, 2, 5, and 6	To conform with the Standards, the proposed design should be updated to retain the portions of the historic building proposed for demolition.
Structural Retrofit	Potential to not meet Standard 2 and 6.	In order to conform with the Standards, care should be taken to retain historic materials.
New Storefronts, Entries, and Canopies		
South Elevation Entries	Does not meet Standard 2, 5, 6, or 9	The extant former loading door, identified as a character-defining feature should be retained. New entries at the proposed amenity space addition should be revised to not overwhelm the historic portion of the building to be retained. The proposed use of corrugated metal on the proposed amenity space should be updated to a different, compatible material to clearly distinguish the original historic building and the proposed alteration.
North Elevation Entries	Does not meet Standard 2 or 9	The proposed new entries should be reduced in scale, and be pulled in at least one structural bay from each end of the character-defining roofline in order to retain more of the building materials and the building's spatial relationship. The existing loading door should be retained and reused instead of introducing new entries in the same general location.
Canopies	Meets the Standards at new entries Does not meet Standard 2 or 5	The proposed removal of existing character-defining shed awnings should be retained instead of being replaced with new canopies.
New Window Openings		
North and South Elevations	Does not meet Standard 2, 3, 5, 6, or 9	It is recommended that the north and south window configuration be updated to no longer include the fixed windows that follow the slope of the roofline.
East Elevation and Skylights	Meets the Standards	No recommendation
Existing Window Treatment	Meets the Standards	In order to comply with Standards 2 and 5, original windows should be retained where condition allows. If windows are deteriorated beyond repair, they should be replaced with windows in kind. New windows should match the historic in configuration and profile and be manufactured in an appropriate replacement material.
Existing Exterior Cladding Material	Meets the Standards	In order to comply with Standards 2 and 5, cladding material should be retained where condition allows. If it is deteriorated beyond repair, it should be replaced with material in kind and match the historic material in color and composition.
Rooflines	Does not meet Standard 2, 5, 6, and 9	The proposed design should be revised to retain the varied rooflines. If structural updates are necessary to meet code requirements, the roof's overall form should be retained and replaced in kind.
Loading Platforms	Does not meet Standard 2, 5, 6, and 9	The revised design should be updated to retain more of the loading platform, including the change in grade from the adjacent parking lot.

New Construction		
Townhouses	Meet the Standards	No recommendations
Garage Addition	Meets the Standards	It is recommended that the proposed use of corrugated metal on the garage addition be revised to a different, compatible material to make it readily distinguishable from the historic building