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SECRETARY OF THE INTERIOR'S STANDARDS REVIEW

REHABILITATION AND ADDITION PROJECT AT A HISTORIC PROPERTY

including

ADDITION & REMODEL TO THE RESIDENCE

and

NEW DETACHED GARAGE REPLACEMENT

324 Madison Street
(Parcel Number 269-41-030)
Santa Clara, Santa Clara County, California

For:

Tommy and Stephanie Tran
324 Madison Street
Santa Clara, CA 95050

Prepared by:

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INTRODUCTION

Executive Summary

The proposed residential rehabilitation project at 324 Madison St. in Santa Clara, California, can be found to be substantially compatible with the *Secretary of the Interior's Standards for the Treatment of Historic Properties – Rehabilitation Standards* (Standards); the project, therefore, can be found to be mitigated to a less-than-significant impact under the California Environmental Quality Act (CEQA) and within the parameters of Mills Act Contracts.

The proposed rehabilitation project would substantially preserve the integrity of the historic property in terms of location, design, materials, artisanship, feeling, and association. The proposed project would maintain the current level of integrity of the setting. The authenticity of the property would be adequately preserved.

There is one recommendation/suggestion for clarification regarding the soffits (Standard 5), and a note regarding typos in the Preservation Plan (Standard 6) that should not affect the overall findings.

The analysis is described more fully in the report that follows.

Report Intent

Tommy and Stephanie Tran, the homeowners, retained Archives & Architecture LLC, to conduct a Secretary of the Interior's Standards Review and Integrity Analysis of the proposed project.

Archives & Architecture was asked to review the exterior elevations, plans, and site plan of the project to determine if the proposed design is compatible with the *Secretary of the Interior's Standards for Rehabilitation* (Standards). The Standards are understood to be a common set of guidelines for the review of historic buildings and are used by many communities during the environmental review process to determine the potential impact of a project on an identified resource. Finding the project to be compatible with the Standards could serve to demonstrate how the project would have a "less than significant impact" on the environment under CEQA and meet Mills Act rehabilitation criteria.

Historic integrity analysis is also useful as a summary component of the design review process. It relates to the criteria for National Register and California Register eligibility. A project that might impact the integrity of a historic resource could impact the significance of that resource. According to the California Office of Historic Preservation Technical Assistance Series #6:

*Integrity is the **authenticity** of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of **location, design, setting, materials, workmanship, feeling, and association**. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. [Emphasis added]*

Qualifications

Leslie A. G. Dill, Partner of Archives & Architecture LLC, has a Master of Architecture with a certificate in Historic Preservation from the University of Virginia and a Bachelor of Arts in Architecture from Princeton University. She is licensed in California as an architect. Ms. Dill is listed

with the California Office of Historic Preservation as meeting the requirements to perform identification, evaluation, registration, and treatment activities within the professions of Historic Architect and Architectural Historian in compliance with state and federal environmental laws. The state utilizes the criteria of the National Park Service as outlined in 36 CFR Part 61.

Review Chronology and Methodology

In June 2022, the project architect contacted Archives & Architecture LLC, requesting historic design-review services; that month, a site visit to the property was undertaken by Leslie Dill of Archives & Architecture LLC, where she took photographs and observed the existing buildings and setting.

For this review, Leslie Dill received and referred to the intensive survey documentation and evaluation contained in the State of California Department of Parks and Recreation Form 523 (DPR523), written by William Kostura and dated September 2021. The design review refers to this document for compatibility of the proposed work, and the integrity statement in this review is based on the integrity statement in the DPR523 documentation and analysis.

An electronic copy of the proposed design set, dated on the set 07/31/23, was forwarded to Leslie Dill by Robert Mayer, Architect, date-stamped 08/01/2023. The drawing set reviewed consists of ten sheets (A1.0, A2.0, A2.1, A3.0, A3.1, A4.0 A5.0-A5.2, and HP1). An initial review was provided by Archives & Architecture; no initial comments or recommendations were conveyed to the architect or owners, and no revisions were prepared. The final review was based on this same drawing set with one minor typo corrected; this set has an updated time stamp of 08/28/23. The analysis and conclusions of the design review are presented in this report.

Disclaimers

This report addresses the project plans in terms of historically compatible design of the exterior of the residence and its setting. The consultant has not undertaken and will not undertake an evaluation or report on the structural conditions or other related safety hazards that might or might not exist at the site and building and will not review the proposed project for structural soundness or other safety concerns. The Consultant has not undertaken analysis of the site to evaluate the potential for subsurface resources.

PROJECT DESCRIPTION

Character Defining Features

The original house was described in William Kostura's historic documentation (DPR523) forms as follows:

Architecturally, this house compares very favorably with other Santa Clara houses of the 1920s and 1930s. Most houses in the city from those decades are plain, and are restrained in their treatment to the point of anonymity. By contrast, this house has many notable features. They include:

- * *tripartite windows with wooden mullions and with wooden muntins that divide the upper zones into multiple lights,*
- * *a projecting front porch that stretches for over one-half the width of the house,*
- * *curved brackets at the top of the porch posts,*
- * *a hipped roof over both the main body of the house and the porch,*
- * *molded clay roof tiles,*
- * *a stucco surface that is textured (instead of smooth),*
- * *a solid wooden front door with a decorative brass grille and brass hardware, and*

** an interior with a high level of finish.*

Collectively, these features make this one of the best houses of its size from the 1920s-1930s in the city.

The roof tiles by J. Pessagno and Sons of Niles are a particularly fine feature. While traditional curved clay roof tiles on other Santa Clara houses are also important, the tiles on this house are distinctive in their profile and cause the roof of this house to stand out from other clay tile roofs in the city.

Historic Status and/or Significance of the Architecture

Per William Kostura's historic documentation (DPR523) forms, the property was evaluated as being eligible for the California Register for architectural significance: "...the house appears to be eligible for the California Register under [Criterion 3]. The Period of Significance is 1936-1938, when it was built."

The property was also evaluated in the DPR forms using the Criteria for Local Significance of the City of Santa Clara. It was found to meet Criterion 4 for Historical or Cultural Significance; Criteria 1, 6, and 7 for Architectural Significance; and Criterion 2 for Geographic Significance. Of note is the possibility of contribution of the property within the historic area of Santa Clara known as the Old Quad, and specifically the block on which the property exists.

The DPR523 form evaluated the property for historic integrity, and the house and property were found to have "very high" integrity that embodies authentic associations.

For this report, it is understood that the garage is not a character-defining feature of the property, and its potential demolition would not be considered an impact on the integrity or significance of the property. The garage was not identified in the historical evaluation as a contributing feature in the property. The description indicates that the garage was built in 1955, and it features very different materials and appearance from the house.

Summary of the Proposed Project

The proposed scope of work includes:

- construction of a rear addition with basement living space
- interior rehabilitation of portions of the main house to accommodate an altered basement staircase, laundry area, kitchen, and bedroom layout
- the demolition of the existing detached garage and the construction of a new detached garage in a different location

SECRETARY'S STANDARD'S REVIEW:

The *Secretary of the Interior's Standards for Rehabilitation* (Standards), originally published in 1977 and revised in 1990, include ten standards that present a recommended approach to repair, while preserving those portions or features that convey a resource's historical, cultural, or architectural values. Accordingly, Standards states that, "Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values." That is the appropriate treatment for the subject property.

Following is a summary of the review with a list of the Standards and associated analysis for this project:

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.”**

Analysis: There is no effective change of use proposed for this residential property.

As a rule of thumb for this reviewer, a project that meets the subsequent nine Standards can be considered to meet this Standard as well. A proposed project that preserves significant historic fabric, provides a compatible new design, and is potentially reversible in the future can be considered to have a compatible use. In this case, the project does meet those Standards, so the use can be considered compatible.

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.”**

Analysis: No primary character-defining portions of the historic main house (footprint, overall roof form, siding material, focal windows, etc.) are proposed for removal; the primary historic residence will be substantially preserved (See also Standard 9).

The rear wall of the house is proposed to be removed as a part of the construction of the new addition. This portion of wall includes repetitive features and duplicate wall cladding, and represents a proportionately small amount of loss, so its alteration would be consistent with this Standard.

The existing detached garage is not original and is not understood to be a contributing building to the property, so its demolition is not in conflict with Standard 2.

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.”**

Analysis: There are no proposed changes that might be mistaken for original features. There are no features that overtly copy other local or regional buildings. Each of the changes appears to be inspired by the historic house, but they are differentiated in a way that precludes a false narrative. The project is compatible with this Standard (See also Standard 9)

The proposed detached garage will be differentiated from the historic house by materials and massing. The use of these materials is familiar in history, but the detailing and simplicity will be modern, and it will not appear to be falsely historic.

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

Analysis: It is understood that no elements of the property have acquired historic significance in their own right. The project is compatible with this Standard.

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

Analysis: Distinctive features and finishes that identify the property are shown as preserved on the proposed drawings. Specifically, this means that the historic main house and its immediate setting will be preserved in this project, including each of the character-defining features listed in the DPR523:

- The tripartite focal windows with wooden mullions and muntins are shown to be preserved.
- The projecting front porch will be preserved, including the stucco brackets, heavy porch posts, and low porch wall.
- The main hipped roof and its projecting hipped porch roof are proposed to be preserved.
- The molded clay roof tiles will be retained, and the scroll-shaped end tiles at the south bump-out (not specifically called out in the DPR523), can safely be assumed to be retained as part of that effort.
- The original textured stucco surface is proposed to be preserved and will be differentiated from the texture of the new wall surfaces.
- The solid wood front door and its decorative brass grille and brass hardware are proposed to be preserved.

Additionally, although not noted in the report, the original wood side windows are also proposed to be preserved, and the brick chimney on the side of the house is proposed to remain in-situ. Three windows are proposed to be salvaged and reused in new locations within this project (See Standard 3).

The side door (kitchen door), not identified as a character-defining feature, is not proposed for reuse. Its removal is in keeping with this Standard.

The flat-board soffit design, with its herringbone joints at the corners, is not identified as a character-defining feature of the house in the DPR523 form, and it is not specifically addressed in the plan set. It may be that this might have been an inadvertent omission by the evaluator and, therefore, not addressed in the plans. It is recommended that the flat-board soffits be retained as much as possible in the original portion of the house. This detail can be continued at the eaves of the addition or can be altered subtly if preferred by the architect and homeowners.

The interior of the house is not reviewed in this report. The Preservation Plan does outline the treatment approach of many of the interior finishes.

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.”

Analysis: The current physical condition of the house appears from observation to be good to very good. The proposed rehabilitation project is primarily focused on alterations to the interior plan, with resulting changes to the exterior elevations. Sheet A2.1 contains Demolition Plan Notes that provide guidance for the repair and maintenance of historic buildings such as this residence. The historic features are shown as substantially preserved in the project drawings and in the Preservation Plan.

Surface cracks in the stucco will be caulked as part of the painting process (See also Standard 7). The window repairs as described in the Preservation Plan are in keeping with this Standard.

In this project, only two deteriorated historic features are listed on Sheet HP1, the Preservation Plan, as being proposed to be replaced or repaired. Broken roof tiles are proposed to be replaced with salvaged matching tiles. The brick chimney is identified as needing stabilization.

This reviewer found a few minor typos within the Preservation Plan, but the intent of each element of the plan remains clear, and the spelling should not affect the proposed findings.

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.”**

Analysis: Per the Preservation Plan on Sheet HP1, no chemical or physical treatments are shown as proposed in this project, or expected, other than preparation for painting. (See also Standard 6)

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

Analysis: Archeological resources are not evaluated in this report.

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

Analysis: The alterations and additions proposed in the drawing set will be compatible with the historic character of the main house and differentiated by their detailing, materials, and forms (See also Standards 2 and 3).

The proposed new rear addition is compatible in form with the main house. Its rectangular footprint and hipped roof are in keeping with the rectangular main footprint and original hipped roof. The proposed new roof has further compatibility with the original residence because it balances with the original porch roof design. The addition will be differentiated through an offset plan, that preserves some of the original rear wall, lowers the proposed new roof, and creates a subordinate wing. On the north (right) side, where the addition is proposed to be in the same plane as the existing wall, the plans include a lightwell and egress for the basement at the new wing. The spatial differentiation formed by the stairwell, curbs, and railings (a two-story wall at the basement landing) will mark the location of the former rear corner and identify the area of new construction.

The proposed addition will feature a mix of matching and differentiated materials that provides compatibility and subtle contrast with the historic house. The proposed roofing tiles will match and be continuous with the existing roofing tiles, creating compatibility, but the roof form will provide differentiation. The proposed new addition will have compatible stucco cladding, but it will feature a differentiated texture. The original house’s rough texture is one of its character-defining features, and the new addition will have a smoother finish. The windows will be a mixture of relocated, salvaged windows where possible, and these will be compatible in their wood sash and stucco moldings. The new side door and other new openings will be set apart by a different trim profile. The new sliding glass doors are of a size and simplicity that is in keeping with the overall proportions and simplicity of the historic house openings; these both face the rear yard, where they have less visibility in the larger neighborhood.

The existing garage building is set away from, and to the rear of, the historic main house. The garage will be set back on the side frontage, allowing the main house to remain predominant in the composition. The simplicity of the gabled, shingled garage roof is differentiated from the primary hipped, tiled roof at the house, but compatible in traditional

form. The horizontal Hardie siding is differentiated from the stucco at the main house, but compatible in scale with the highly textured house finish. The size of the gable end is proposed to be relieved by the inclusion of a small attic-style window and integral lighting fixtures. The new windows at the garage are proposed to have a similar size in area as the windows at the house, but they are differentiated by their wide proportions and awning type.

- 10. “New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”**

Analysis: The proposed design preserves the character-defining form and integrity of the historic property. The original rear wall would remain in part, and the removed portion could be reproduced with ease, basing the materials and location on the remaining surrounding elements. The essential historic features, form, materials, and character of the main house would be unimpaired in this project, and the proposed detached garage could be removed in the future without impact on the integrity of the property.

HISTORIC INTEGRITY ANALYSIS

The following analysis is intended to address how the proposed residential rehabilitation and addition project might potentially preserve or impact the historic integrity of the subject property. The analysis utilizes the seven aspects of historic integrity indicated by the National Register and State of California’s definition of authenticity of a resource.

Location: The project proposes to preserve the address and original footprint and orientation of the house. The location of the contributing historic resource would be preserved in this project.

Setting: The immediate setting of the historic house within the property would be preserved in this project; the house would remain in an open space, with opportunities for viewing from all sides per the historic property setting. The construction of a replacement detached garage is in keeping with the historic use of the property and its previous detached outbuilding in the rear yard within the parcel.

The integrity of setting within the Old Quad Neighborhood would not be impacted by the proposed project. The project would maintain the existing immediate setbacks for the historic house to be used, viewed, and understood, and the detached garage is proposed for a traditional rear corner placement on the property. The larger neighborhood setting would also be maintained as-is, per the existing size, massing, and scales of the historic and associated buildings in the larger landscape.

Design, Materials, Artisanry: The project proposes to preserve the house’s residential form, materials, scale, and character-defining features. The proposed scope of work alters a small area of non-character-defining materials at the rear of the property, and the windows affected by the addition will be salvaged and reused. The character-defining features, form, and materials of the house will be preserved.

Feelings: The historic residence would continue to convey the modest early twentieth-century feeling embodied in the Mediterranean Revival style and character-defining original materials.

Associations: With this project, the property would continue to provide continuity of associations with the period of historical and/or cultural significance, architectural significance, and geographic significance of the house, its design, and its contribution to the Old Quad neighborhood and the City of Santa Clara.

CONCLUSIONS

There is one recommendation for clarification regarding the soffits, and a note regarding typos in the Preservation Plan that should not affect the ability to make findings.

The proposed project can be found compatible with the *Secretary of the Interior's Standards for the Treatment of Historic Properties – Rehabilitation Standards*. A project that meets the Secretary of the Interior's Standards can be found to be mitigated to a "less than significant impact" under the California Environmental Quality Act and in keeping with the Mills Act intentions.

The proposed project can also be found to preserve the historic integrity of the significance of the property. With the proposed rehabilitation and addition project, the property can be found to continue to convey its historic associations, including the continued prominence of an authentic early-nineteenth-century residence, with integrity of location and setting, with methods and materials of construction, feelings, and associations.