

**APPENDIX E**  
**HISTORIC RESOURCES TECHNICAL REPORT**

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Historic Resources Technical Report  
Douglas Avenue Redevelopment Project  
Burlingame, California

Prepared for:

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## **Introduction**

This Historic Resources Technical Report has been prepared as part of EIR Douglas Avenue Redevelopment project in Burlingame, California.

The Historic Resources Technical Report contains the results of the following tasks:

1. A peer review of Page and Turnbull's evaluations of the historic significance of 1128 Douglas Avenue and 1132 Douglas Avenue. Page and Turnbull found 1128 Douglas to be eligible for the California Register but not the National Register, and found the house at 1132 Douglas to be ineligible for both registers. Page and Turnbull did not evaluate the historic significance of 524 Oak Grove Avenue.
2. A peer review of a report by Carey & Co. Inc., which found both 1128 Douglas Avenue and 1132 Douglas Avenue eligible for the National Register and California Register.
3. An evaluation of the historic significance of 524 Oak Grove Avenue.
4. A review of the plans for the rehabilitation of 1128 Douglas Avenue for conformity with the Secretary of the Interior's Standards for Rehabilitation.
5. An assessment of the suitability of the site at 524 Oak Grove Avenue for the relocation of 1128 Douglas Avenue.

## **Methods**

This report was conducted by Richard Brandi who holds an M.A. in Historic Preservation from Goucher College, Maryland, and a B.A. from U.C. Berkeley. He is listed as a qualified historian by the San Francisco Planning Department and the California Historical Resources Information System. In addition to researching and writing historic context statements, Mr. Brandi conducts historic resource evaluations; architectural surveys; CEQA, NEPA, and Section 106 reviews; HABS/HAER documentation; National Register nominations; and project reviews using the Secretary of the Interior's Standards for the Treatment of Historic Properties. Richard has completed two nominations to the National Register of Historic Places, two HABS/HAER documentations, and dozens of HREs. He has also evaluated hundreds of buildings and surveyed thousands of buildings and structures. He has conducted design review using the Secretary of the Interior's Standards for the Treatment of Historic Properties in San Francisco, Chico, Pacific Grove, Pebble Beach, Redwood City, and Riverside. With more than 10 years of professional experience in architectural history and historic preservation, Mr. Brandi meets the requirements of a Qualified Professional in Architectural History and History as set forth by the Secretary of the Interior.

Mr. Brandi reviewed the Page and Turnbull evaluations, Carey & Co report, conducted a site visit to the Douglas Avenue and Oak Grove Avenue project sites on June 22, 2015, and reviewed the project's plans dated January 21, 2015.

## **Project Summary**

The project envisions constructing a five-story, 29-unit apartment building on the lots currently occupied by 1128 Douglas Avenue and 1132 Douglas Avenue. A portion of the house at 1128 Douglas Avenue that retains most of its historic integrity will be moved to 524 Oak Grove Avenue and rehabilitated. The house at 1132 Douglas Avenue will be demolished. The house currently on the site at 524 Oak Grove Avenue will be demolished.

### **1. Peer Review of Page & Turnbull Evaluations**

Page & Turnbull conducted evaluations of the historic significance of 1128 Douglas Avenue and 1132 Douglas Avenue. These historical evaluations are contained on State of California Department of Parks and Recreation 523 forms dated May 26, 2013 and May 15, 2013, respectively.

#### **1128 Douglas Avenue**

Page & Turnbull found 1128 Douglas Avenue to be ineligible for listing on the National Register of Historic Resources but to be individually eligible for listing in the California Register of Historical Resources under Criteria 1 and 2. Page & Turnbull found that the house retained its historic integrity.

##### *Criterion 1 (Events)*

1128 Douglas Avenue appears to be individually eligible for listing in the California Register under Criterion 1 (Events) for its association with early settlement patterns in the town of Burlingame. The period of significance for this context is 1885–1915. Constructed in 1903, the house is one of the very oldest extant residential structures in Burlingame, the seventh constructed in the town according to owner family recollection. It was originally located at 1206 Burlingame Avenue, which was where many of the town's earliest middle-class and upper-class families built their homes, and moved in 1914 to its present location... (Its) relocation does not negatively affect this property's eligibility for register inclusion because it was undertaken nearly 100 years ago and undertaken as part of a local development trend for property owners around the same time. Thus, the move itself was associated with a significant aspect of physical development for the city.

##### *Criterion 2 (Persons)*

1128 Douglas Avenue also appears to be individually eligible for listing in the California Register under Criterion 2 (Persons) due to its association with James R. and Jessie N. Murphy. The period of significance for this association is 1903–1940, the period in which both Murphys were alive, contributing actively to the city, and living in the house... The Murphys' role in the development of Burlingame as well as their long association with the property meet the threshold for significance for listing in the California Register under Criterion 2 (Persons).

### *Integrity*

... The building retains integrity of location because its tenure at its original location was 11 years, and its tenure at its current location has been 99 years. Integrity of setting is fair because the surrounding residential neighborhood has shifted from an area characterized by single family homes to one that is increasingly characterized by larger multi-unit apartment buildings and condominiums. However, a few other homes from this era of early settlement are extant in the area...which bolsters integrity of setting.

With regard to integrity of design, materials, and workmanship, integrity...has been somewhat compromised due to alterations to the primary façade, including the enclosure of part of the front porch and the reconfiguration of openings at the primary façade...

Therefore, integrity of design, materials, and workmanship in relation to the association with the Murphy Family period of significance (1903–1940) remains high because the majority of porch and fenestration changes appear to have taken place during this period. Larger alterations to the rear are not easily visible from the street and do not compromise overall integrity of design, materials, and workmanship. 1138 Douglas Avenue [typo on DPR form, should be 1128] retains integrity of feeling and association because the house retains its original use as a residence.

Mr. Brandi generally concurs with Page & Turnbull's analysis and opinion. Page & Turnbull's archival research, construction history (with one exception), the analyses of the historical significance, and integrity appear to be sound.

Page & Turnbull listed the following four changes that were made to the house:

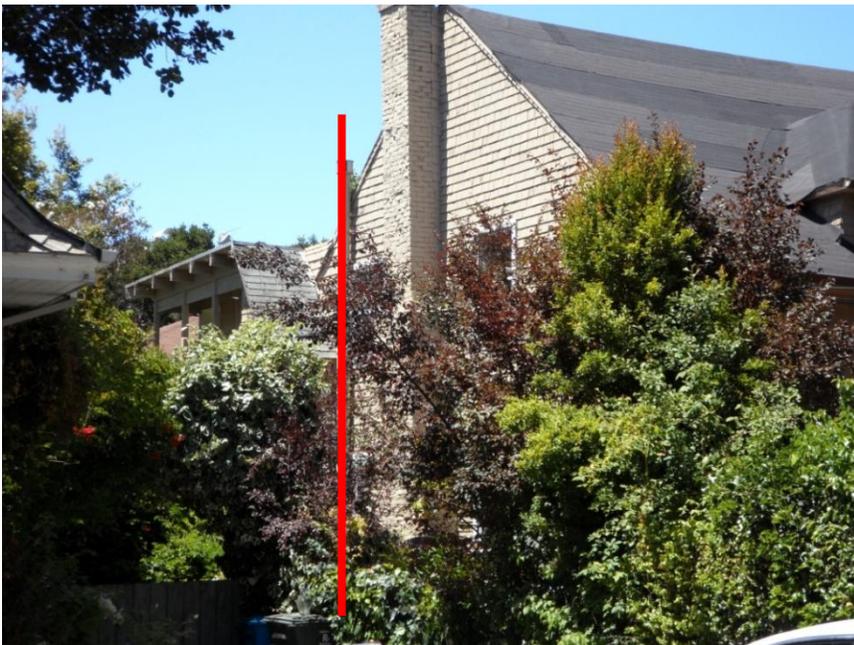
- enclosure of the right side of front porch (after 1916)
- reconfiguration of the primary entrance (after 1916)
- second-story porch construction at west façade (date unknown)
- one-story shed addition at the rear façade (date unknown)

However, the list appears to have missed the fact that the original house was smaller. The original house was nearly doubled in size between 1905 and 1921. The c.1905 photo on the next page shows the house before it was moved from Burlingame Avenue. It had a nearly square shape and was two stories high with a side-gable roof with a one-story porch or shed on the rear and one chimney (centered on the west façade).



1128 Douglas Avenue c.1905.

It appears that the rear one-story porch or shed seen in the photo above was replaced by a two-story rear addition sometime between 1905 and 1921.

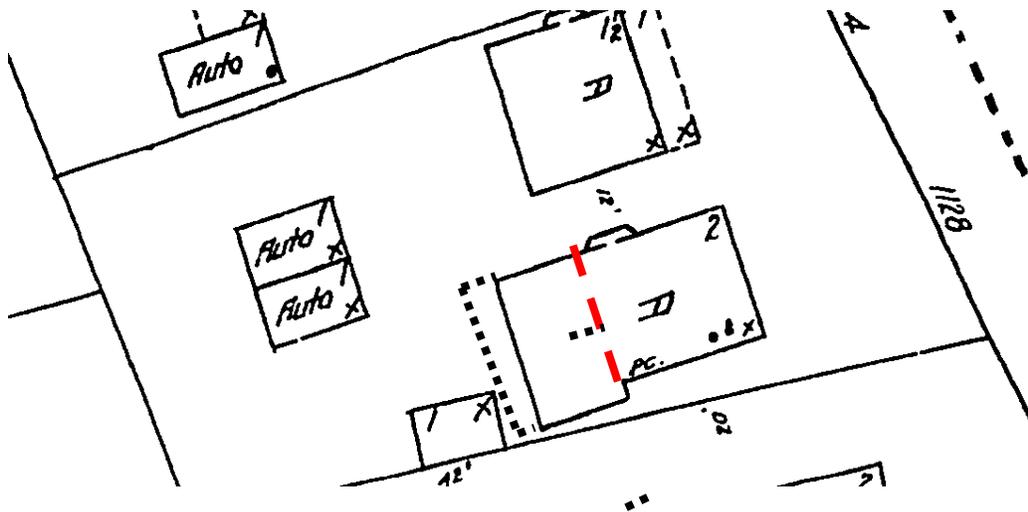


West facade with red line showing the approximate extent of the original house at 1128 Douglas Avenue.

Evidence of the addition can be seen in the pattern of the shingles on the right-hand side of the house. A row of shingles flare out at the second story windows to the left of the chimney (on the original house) but are completely flat to the right (on the addition to the rear). The roof becomes flat at this point. The 1905 photo does not show this chimney. It appears that a chimney was added where the addition joins the original house.



East façade (right hand side of building) showing a flared shingle pattern on the original house and flat pattern on the addition made to the rear. Line marks the extent of original house to the left.



The 1921 Sanborn map shows a rectangular-shaped house with the bay window midway on the east façade as it looks today. The current house is rectangular-shaped with a shed addition on the rear and two chimneys. The three dashes in red show the approximate size of the original house. The small dotted line shows approximately the extent of a later shed addition.

The enlargement of the house appears to have taken place when the Murphys owned it, probably after it was moved in 1914 from 1206 Burlingame Avenue to its present location. Although Page & Turnbull did not address the enlargement of the house, the company argues that changes made by the Murphys before 1940 are part of the historic fabric of the house.



Two additions were made to the original house, one presumably by the Murphys and one later.

Page & Turnbull lists the changes to the primary façade that they consider to be historic fabric: the centered door became a window, patio doors were added on the right-hand side of the porch, the ends of the porch were enclosed with windows, a door with a transom and sidelights was added to enclose the right side of the porch, and a full-width porch was converted into a partial-width porch.



Page & Turnbull does not list the rear addition by the Murphys as historic fabric and suggests it is not: “Murphy Family period of significance (1903–1940) remains high because the majority of porch and fenestration changes appear to have taken place during this period. *Larger alterations to the rear are not easily visible from the street and do not compromise overall integrity of design, materials, and workmanship.*” (Emphasis added)

Although the expansion of the house might have occurred under the ownership of the Murphys , the archival record is not clear. In any case, even if the addition was done when the Murphys owned the house, a shed roof addition on the rear was made after their tenure, thus degrading the historic integrity of the Murphys’ addition. Page & Turnbull argues the house retains its integrity in spite of large alterations to the rear (i.e., the two non-historic additions) because they are not easily visible from the street.

The original gable roof house shown in the 1905 photo is unquestionably historic in spite of minor changes to its façade. Based on these factors, Mr. Brandi concludes the rear additions, including the one that doubled the house, is not part of the house’s historic fabric.

## **1132 Douglas Avenue**

Page & Turnbull found that 1132 Douglas Avenue does not appear to be individually eligible for listing in the California Register and assigned a California Historical Resource Status Code (CHRSC) of “6Z,” meaning that it was “found ineligible for National Register, California Register, or Local designation through survey evaluation.”

### *Criterion A/1 (Events)*

Constructed in 1910, 1132 Douglas Avenue does not appear to be individually eligible for listing in the National or California Registers under Criterion A/1 (Events) ... The house was built relatively early in Burlingame’s suburban development, but was one of a number of buildings constructed by the early 1910s...The house does convey contextual significance in association with the development of the Burlingame Land Co. subdivision, but it does not appear significant or influential in the development of the neighborhood.

### *Criterion B/2 (Persons)*

1132 Douglas Avenue does not appear to be individually eligible for listing in the National or California Register under Criterion B/2. The property is associated with its long-time owner and occupant Everett J. Savill. Although Savill is remembered as an early resident of Burlingame, his contributions to the history of Burlingame do not meet the threshold of significance for register inclusion. Esther and Marvin Joe Savill similarly do not garner significance for the property.

### *Criterion C/3 (Architecture)*

1132 Douglas Avenue does not appear to be individually eligible for listing in the National or California Registers under Criterion C/3...The Queen Anne–style building is relatively well preserved and had undergone moderate alterations, but displays little in the way of characteristic period style or detailing. It is a modest example of the style and does not appear to be an influential or noteworthy example of residential construction in the neighborhood. The architect and builder are unknown and cannot be considered masters.

Mr. Brandi concurs with Page & Turnbull’s analysis and opinion. Page & Turnbull’s archival research, construction history, the analyses of the historical significance, and integrity of the house appear to be sound.

## **2. A Peer Review of Carey & Co's Historic Resources Inventory for the Downtown Specific Plan**

In 2008, Carey & Co. produced an inventory of historic resources as part of the Downtown Specific Plan. Carey & Co surveyed more than 500 buildings and provided short summaries for 74 buildings that appeared to have some degree of historic significance. Carey & Co listed 1128 and 1132 Douglas Avenue on the inventory, finding them to be eligible for the National Register and the California Register. Apparently, State of California Department of Parks 523 forms were not produced and it is not clear how much archival research was conducted to justify the findings that 1128 and 1132 Douglas Avenue meet the criteria for eligibility on the registers. In any case, Page & Turnbull noted that alterations had been made to the primary façade of the 1132 Douglas Avenue house after it was surveyed in 2008, thus degrading its historic integrity. Due to this and the analysis performed by Page & Turnbull (above), Mr. Brandi concurs with Page & Turnbull's opinion that 1128 Douglas Avenue is not eligible for the National Register or California Register.

## **3. Historical Evaluation of 524 Oak Grove Avenue**

The house at 524 Grove Street was evaluated to determine the building's eligibility for the National Register of Historic Places, California Register of Historical Resources, and/or local designation. The house has not been evaluated and is not listed on any register of historic resources. Research consisted of a site visit, visual inspection of the buildings, a review of historic Sanborn maps, and building permits obtained from the Burlingame Community Development Department. Unless otherwise indicated, photos were taken by Richard Brandi on June 22, 2014.



524 Oak Grove Avenue, front façade.



524 Oak Grove Avenue, front façade.

### **Description**

The single-family house is asymmetrical and rectangular-in-plan. It is detached, with one and one-half stories and has a complex shaped roof of intersecting hip and gables. The front façade has a recessed, centered, glazed, wood door that is reached by three brick steps. The house has a gable-end projection on the left side of the façade containing a three-window bay with a metal roof and a fixed pane window on the side. A two-story section on the right side of the façade has a two-car garage door on the ground story and a wood, French door with wood balcony on the second story. Faux shuttles flank the French doors, and the balcony has a metal railing.



West façade.

The west façade has a prominent chimney clad in random stone. There are two swing-out windows and a patio door with a French balcony.



East façade.

The east façade has two swing-wood, multi-pane windows, one double-hung window, and one swing-out, single pane window on the second story. The first story (garage) is not visible.

The rear of the house is not visible from the public right of way.

## **Construction History**

San Mateo County Assessor records show that the building was constructed in 1939. A permit to construct the house was not found. Permits indicate the kitchen and bath were remodeled in 1990, a heavy cedar shake roof was installed in 1986, termite work was done in 1978, unspecified work on the furnace was done in 1972, and unspecified electrical work was done in 1961.

## **Historical Significance**

### *National Register of Historic Places*

The National Register of Historic Places (NRHP) evaluates a property's historic significance based on the following four criteria:

Criterion A (Event): Properties that are associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B (Person): Properties that are associated with the lives of persons significant in our past.

Criterion C (Design/Construction): Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Criterion D (Information Potential): Properties that have yielded, or may be likely to yield, information important to prehistory or history.

In addition to historic significance, an NRHP evaluation includes a determination of physical integrity, or the property's ability to convey its historic significance. Integrity consists of seven aspects: location, design, setting, materials, workmanship, feeling, and association.

To be potentially eligible for individual listing on the NRHP, a structure must usually be more than 50 years old, must have historic significance, and must retain its physical integrity. Since the buildings were constructed more than 50 years ago, they meet the age requirement.

### Criterion A (Event)

Archival research has not revealed that the house has any association with a historically significant event.

#### Criterion B (Person)

Archival research has not revealed the association of any historically significant person with the building.

#### Criterion C (Design/Construction)

Properties may qualify for listing if they, 1) embody the distinctive characteristics of a type, period or method of construction; 2) represent the work of a master; or 3) possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

The building is undistinguished and has no discernible architectural style. The house does not embody the distinctive characteristics of a type, period, or method of construction. The designers or architects (if any) are not known, and the building does not possess high artistic values or distinction.

#### Criterion D (Information Potential)

Archival research provided no indication that the building has the potential to yield information important to prehistory or history.

### *California Register of Historical Resources*

The California Register of Historical Resources (CRHR) evaluates a resource's historic significance based on criteria that are very similar to the National Register. For the reasons outlined above under the discussion for the National Register, the buildings are not eligible for listing under the California Register of Historic Resources.

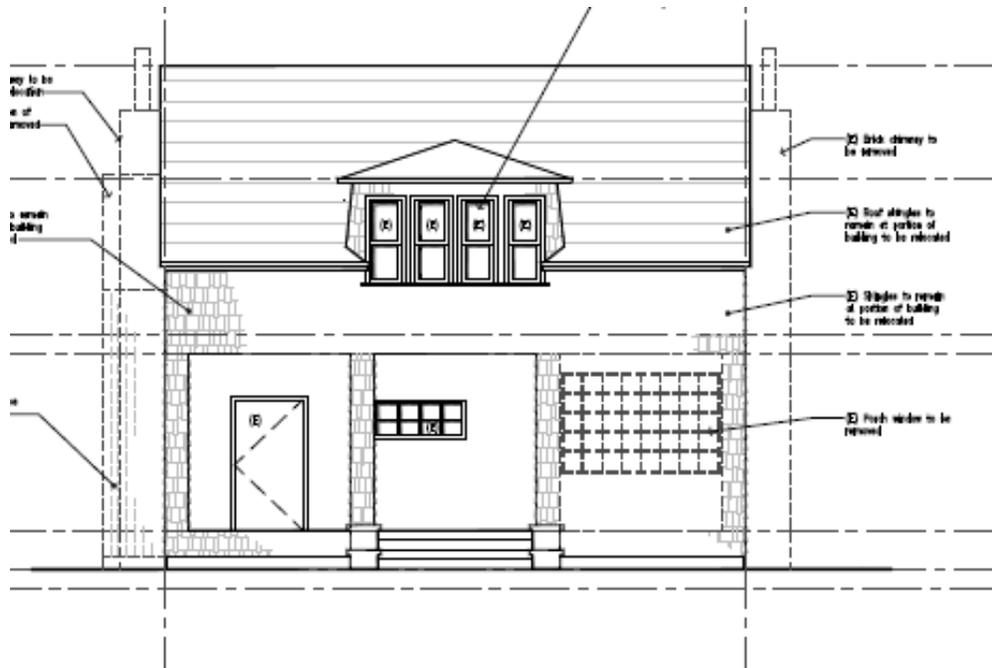
#### Integrity

The evaluation of historic significance is a two-step process. First, the historic significance of the property must be established. If the property appears to possess historic significance, then a determination is made of its physical integrity, that is, its authenticity as evidenced by the survival of characteristics that existed during the resource's period of significance. Since the building does not possess historic significance, there is no need to evaluate its physical integrity.

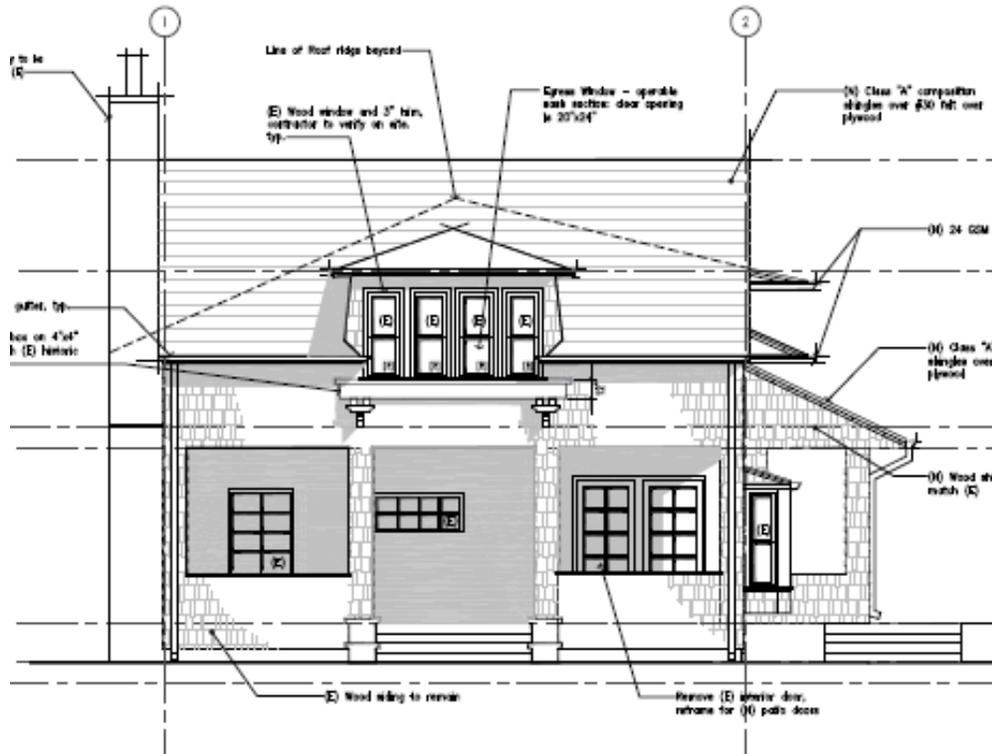
#### Conclusion

The building is not eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, or for local designation. The City of Burlingame does not have a register of historic properties, and therefore the property cannot be listed locally.

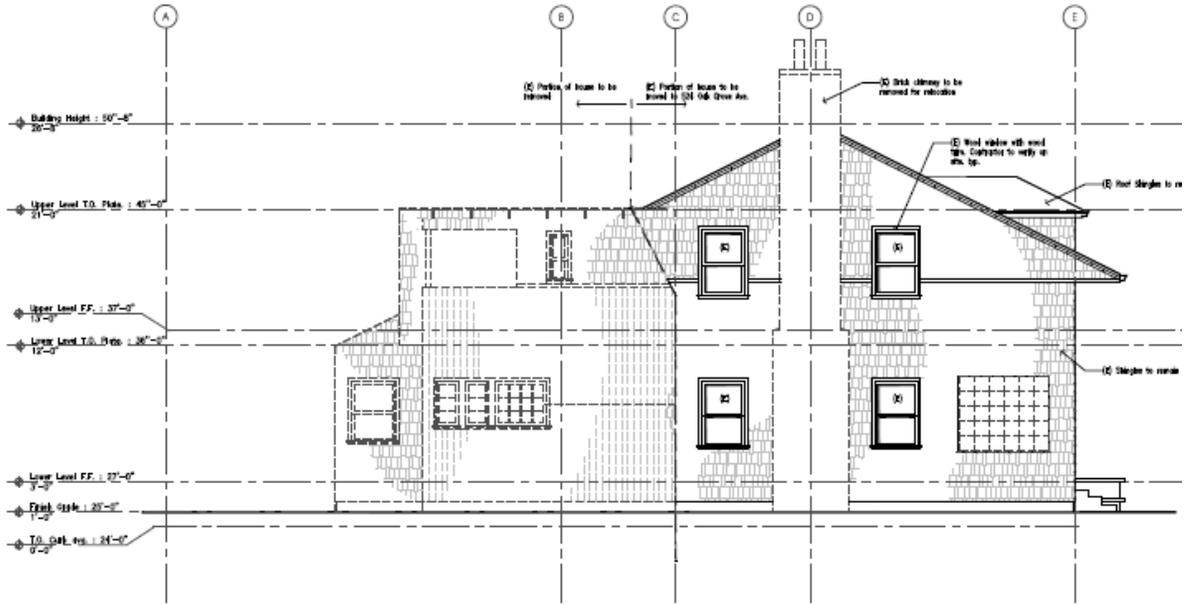




1 Existing South Elevation  
 (E) House at 1128 Douglas Ave.

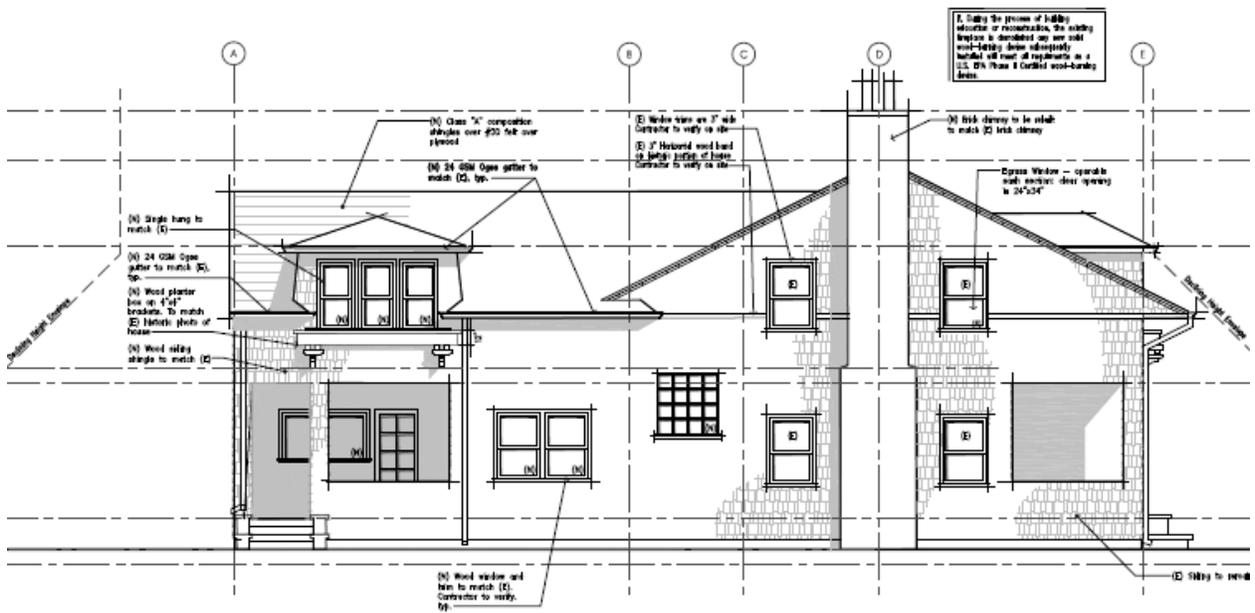


2 Proposed South Elevation  
 (E) House at 1128 Douglas Ave.



1 Existing West Elevation  
 (E) House at 1128 Douglas Ave.

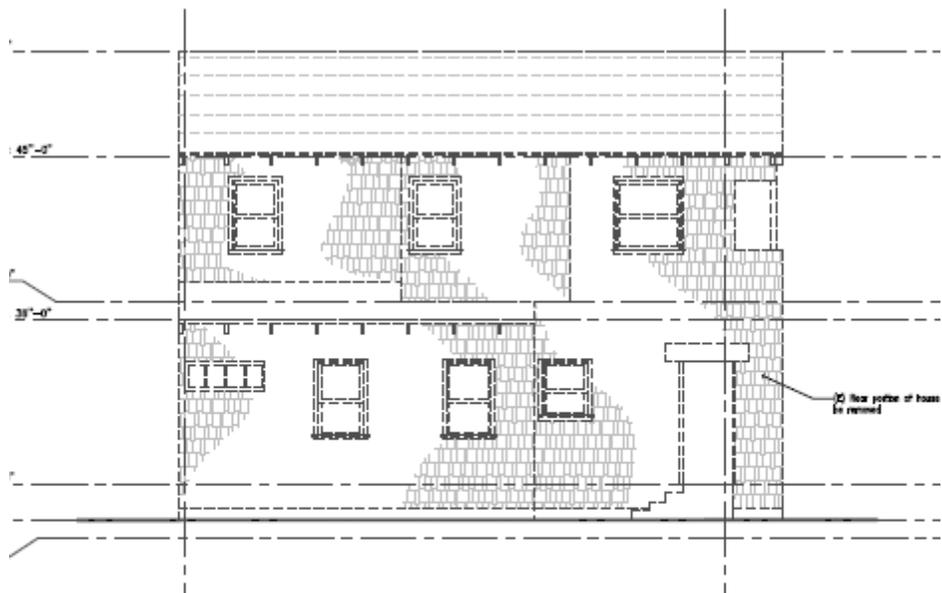
1/8" = 1'-0"



2 Proposed West Elevation (Front of house)  
 (N) House at 524 Oak Grove Ave.

1/8" = 1'-0"

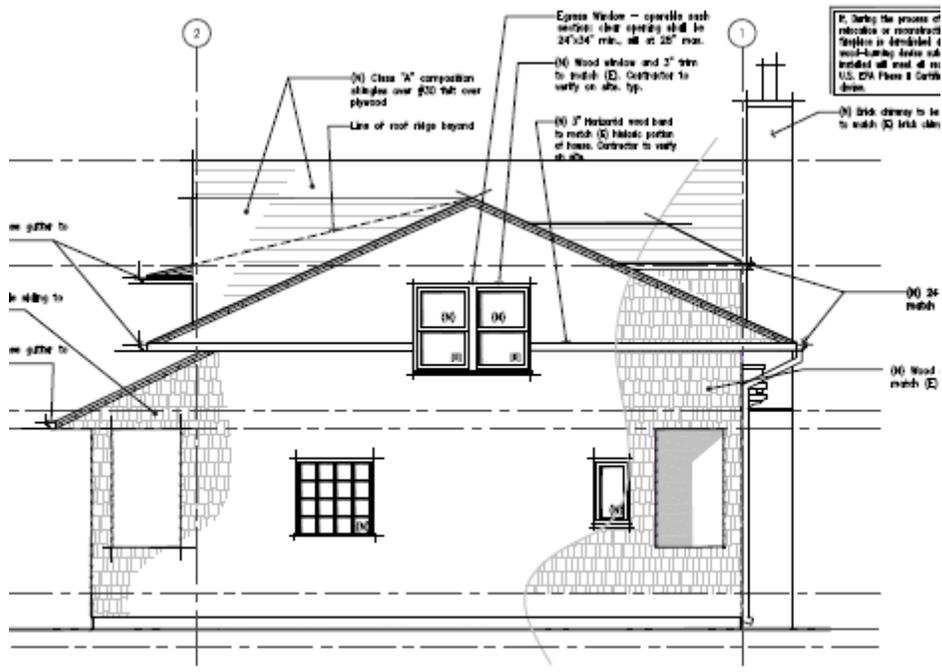




Proposed North Elevation

House at 1125 Douglas Ave.

1/2" = 1'-0"



Proposed North Elevation

House at 524 Oak Grove Ave.

1/2" = 1'-0"

Changes proposed to the historic house's front façade are the removal of a window and door that enclose the porch. This change will make the porch full width and open at each end, much as it was in 1905–1914. The east and west façades of the historic house will not be changed.

When a proposed project has the potential to affect a historic resource, *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings* (hereinafter "Standards") is used to provide guidance to review the potential impacts on the historic structure. There are four standards for the treatment of historic properties: Preserving, Rehabilitation, Restoring, and Reconstructing. The current project is not attempting to preserve or restore the building, but to reorganize and reprogram the interior spaces while preserving the exterior of the building. Therefore, the Rehabilitation Standard is appropriate for this project. The proposed project was evaluated in this report through the application of the Rehabilitation standard.

*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 heritage.*

*—Secretary of the Interior's Standards for Rehabilitation*

The proposed project should adhere to the following Standards.

- (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.**

The building will be used as it was historically — for residential use. Therefore, the project is consistent with Standard #1.

- (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.**

The project removes the rear section of the historic house that was added after the house was moved from Burlingame Avenue to Douglas Avenue circa 1914. Although this addition may have been done when the Murphys owned the house, a shed roof addition on the rear was made after their tenure, thus degrading the historic integrity of the Murphys' addition. The loss of integrity of the Murphys' addition means that it is not part of the historic character of the house. Thus, it does not contain "distinctive materials."

The project does not envision the removal of distinctive materials or to alter features, spaces, and spatial relationships that characterize the property. Therefore, the project is consistent 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.**

The project does not propose to add conjectural features and is therefore consistent with Standard #3.

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

No documented changes to the property have achieved historic significance; therefore, the proposed project is consistent with Standard #4.

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

The project proposes to remove the window and door from the porch but does not propose to remove any other distinctive materials, features, finishes, and construction techniques or examples of craftsmanship. The window and door on the porch were added when the Murphys owned the house and are considered to be historic fabric. However, since the house originally did not have these features, their removal restores the look of the porch to its pre-1914 era. For this reason, the changes are consistent with Standard #5.

- (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.**

The project proposes to retain the siding and windows of the historic house and therefore is consistent with Standard #6.

- (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.**

The project should use the gentlest means possible in order to be consistent with Standard #7.

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

This report does not evaluate potential archeological resources.

- (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.**

The proposed project proposes to replace the rear section of the house, consisting of the post-1914 addition and a later shed roof addition, with new construction. The part of the house to be removed does not contain historic material or features and so the project is consistent with Standard #9 in this regard.

However, the new construction is proposed to be clad in shingles matching those on the historic house. Such cladding is not sufficiently different to be consistent with Standard #9.

- (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.**

The new construction could be removed and not impair the form and integrity of the building and therefore is consistent with Standard #10.

### **Mitigation Measures**

As discussed under Standard #9, the new construction is proposed to be clad in shingles matching those on the historic house. Such cladding is not sufficiently different to be consistent with Standard #9. It is recommend that a different cladding be used that is different and compatible with the historic house. A number of options are available that would be compatible with the historic house, including horizontal wood siding.

### **5. Suitability of the Site at 524 Oak Grove Avenue as a Location for Moving the House Now at 1128 Douglas**

The project envisions moving 1128 Douglas Avenue to 524 Oak Grove Avenue. The relocation of 1128 Douglas Avenue could create a substantial adverse change in the significance of an historical resource due to its relocation.

A substantial adverse change in the significance of an historical resource means physical demolition, destruction, **relocation**, (emphasis added) or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>1</sup>

The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.<sup>2</sup>

Eligibility for listing on the California Register of Historical Resources has a three-part test: a resource must meet one of four criteria for historic significance; must generally be more than 50 years old; and must retain its historic integrity.

The California Register of Historical Resources (CRHR) evaluates a resource's historic significance based on the following four criteria:

Criterion 1 (Event): Resources associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2 (Person): Resources associated with the lives of persons important to local, California, or national history.

Criterion 3 (Design/Construction): Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master or possess high artistic values.

Criterion 4 (Information Potential): Resources that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one of the four criteria, a resource must be more than 50 years old, unless it can be demonstrated that sufficient time has passed to understand the building's historical importance.

The evaluation of historic significance is a two-step process. First, the historic significance of the property must be established. If the property appears to possess historic significance, then a determination is made of its physical integrity: that is, its authenticity as evidenced by the survival of characteristics that existed during the resource's period of significance.

There are seven aspect of integrity:

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

The property has been evaluated as being eligible for listing on the California Register and is therefore considered to be a historic resource that is proposed to be relocated. The issue is whether the relocation will result in a loss of historic integrity such that it makes the house no longer eligible for listing on the California Register.

### **Project Impacts and Historic Integrity**

The project proposes to move the house at 1128 Douglas Avenue to 524 Oak Grove Avenue where it will be rehabilitated. The move itself will not affect the aspects of integrity related to design, materials, and workmanship. The aspects of integrity that relate a resource to be relocated are its location, setting, feeling, and association. The question is whether the move will affect the resource's historic integrity to such an extent that it would no longer be considered eligible for the California Register. According to the National Register:<sup>3</sup>

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in *Part VII: How to Apply the Criteria Considerations*, for the conditions under which a moved property can be eligible.)

#### **CRITERIA CONSIDERATION B: MOVED PROPERTIES**

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

#### **Eligibility for Architectural Value**

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

#### **Setting and Environment**

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

Page & Turnbull found the Murphy house to be eligible for listing on the California Register for its association with an important event and person. Thus it can be moved.

The question is whether the setting and environment is comparable. The National Register of Historic Places provides guidance for moving historic resources including the required characteristics of the new location. According to the National Register of Historic Places,

...moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.<sup>4</sup>

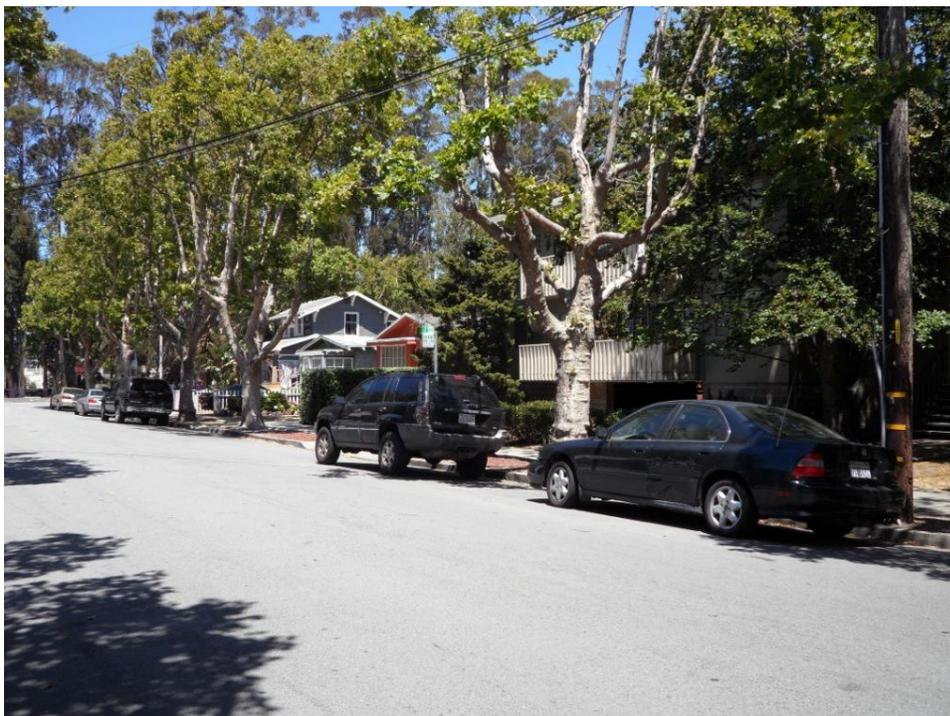
The current orientation, setting, and general environment of 1128 Douglas Avenue consist of a residential neighborhood with a mix of multiple-story, multiple family buildings built during the 1960s and later, along with single story buildings with residential or commercial uses. The street has large trees.



View of 1128 Douglas Avenue looking east



View of the same side of the street as 1128 Douglas Avenue looking east



View of the same side of the street as 1128 Douglas Avenue looking west.



View directly across the street from 1128 Douglas Avenue.



View across the street from 1128 Douglas Avenue looking west.



View across the street from 1128 Douglas Avenue looking east.

As Page & Turnbull noted:

Integrity of setting (of 1128 Douglas Avenue) is has been compromised to an extent because the surrounding residential neighborhood has shifted from an area characterized by single family homes to one that is increasingly characterized by larger multi-unit apartment buildings and condominiums.

The proposed location at 524 Oak Grove Avenue is a residential neighborhood and is similar in that regard to present-day Douglas Avenue. Oak Grove Avenue has large trees as does Douglas Avenue. Additionally, 524 Oak Grove Avenue is characterized by single-family houses and is, in fact, more similar to the historic setting of 1128 Douglas Avenue than its current location. For these reasons, the proposed relocation site at 524 Oak Grove Avenue meets National Register Criterion B for moved properties, that they be “comparable to those of the historic location.”



524 Oak Grove Avenue at intersection of Marin Drive.



View of Marin Drive looking northeast.



View looking southwest at Marin Drive.

## **Findings**

1. Mr. Brandi concurs with Page & Turnbull's evaluations of the historic significance of 1128 Douglas Avenue and 1132 Douglas Avenue.
2. The house at 524 Oak Grove Avenue does not meet the criteria for listing on the California Register of Historical Resources and is therefore not a historic resource under CEQA.
3. The project will conform to the Secretary of the Interior's Standards for Rehabilitation with the recommended mitigation.
4. The project's proposal to relocate 1128 Douglas Avenue to 524 Oak Grove Avenue will not result in a loss of historic integrity to 1128 Douglas Avenue, which will continue to be eligible for listing on the California Register.

## **6. Conclusion**

The California Environmental Quality Act contains provisions to protect historic resources. In this case, the project poses two risks to 1128 Douglas Avenue. The rehabilitation and relocation must be done in a manner that does not create a "substantial adverse change in the significance of an historical resource."

Under CEQA, projects that conform to the Secretary of the Interior's Standards for Rehabilitation are generally considered to be mitigated to less than a significant effect under

CEQA. The project will conform to the Secretary of the Interior's Standards for Rehabilitation with the recommended mitigations.

The project's proposed site for relocating 1128 Douglas Avenue, 524 Oak Grove Avenue, meets the National Register Criterion B for moved properties will not result in a loss of historic integrity; the property will continue to be eligible for listing on the California Register.

Therefore, the project has no impact on the significance of the historical resource 1128 Douglas Avenue and will not have a substantial adverse change under CEQA.

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### Notes

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<sup>1</sup> California Office of Historic Preservation Web site, [ohp.parks.ca.gov/?page\\_id=21726](http://ohp.parks.ca.gov/?page_id=21726); assessed November 20, 2014.

<sup>2</sup> California Code of Regulations, Title 14, Chapter 3 15064.5.

<sup>3</sup> [http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15\\_7.htm#crit%20con%20b](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_7.htm#crit%20con%20b); accessed July 9, 2015

<sup>4</sup> [http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15\\_7.htm#crit%20con%20b](http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_7.htm#crit%20con%20b); accessed July 9, 2015.