



HISTORICAL COMMISSION REGULAR MEETING AGENDA

October 27, 2025 - 6:00 PM
Sequoia Room, Los Altos Community Center, 97
Hillview Avenue, Los Altos, CA

IN-PERSON PARTICIPATION: Members of the public may participate in-person at the Los Altos Community Center in the Sequoia Room located at 97 Hillview Avenue, Los Altos, CA.

REMOTE MEETING PARTICIPATION: Members of the public may attend the meeting virtually via the link below, but will not be permitted to provide public comment via Zoom or telephone.

<https://tinyurl.com/4sd63mra>

Telephone: 1-669-444-9171 / Meeting ID: 881 8335 2531 / Passcode: 700818

PUBLIC COMMENT: Public comments can be made verbally, in-person at the public hearing, or submitted in writing prior to the meeting. Written comments may be emailed to [**HCpubliccomment@losaltosca.gov**](mailto:HCpubliccomment@losaltosca.gov)

Correspondence must be received by 2:00 p.m. on the day of the meeting to ensure distribution prior to the meeting. Comments provided after 2:00 p.m. will be distributed the following day and included with public comment in the packet.

Public comment will not be taken via Zoom or telephone.

AGENDA

ESTABLISH QUORUM

PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA

Members of the audience may bring to the Commission's attention any item that is not on the agenda. Please complete a "Request to Speak" form and submit it to the Staff Liaison. Speakers are generally given two or three minutes, at the discretion of the Chair. Please be advised that, by law, the Commission is unable to discuss or take action on issues presented during the Public Comment Period. According to State Law (also known as "the Brown Act") items must first be noticed on the agenda before any discussion or action.

ITEMS FOR CONSIDERATION/ACTION

SPECIAL ITEM

1. Election of Chair and Vice-Chair

Request the Commission nominate and elect a Chair and Vice-Chair to serve until the first meeting in October 2026.

CONSENT CALENDAR

2. Historical Commission Minutes

Request to approve the minutes of the special meeting of August 18, 2025

PUBLIC HEARING

3. H25-0001 - James and Effat Parivash - 81 Pepper Drive

Request to remove the property located at 81 Pepper Drive from the City of Los Altos Historic Resource Inventory (HRI). The project is exempt from environmental review pursuant to Section 15061(b)(3) of the California Environmental Quality Act (CEQA).

DISCUSSION ITEMS

4. 2026 Historical Commission Meeting Dates

Discussion of the Historical Commission Meeting Dates for 2026

5. 2024–2025 Mills Act Quinquennial Audit Update

Receive the report on the 2024–2025 Mills Act Quinquennial (Five-Year) Audit of 14 designated historic properties and provide comments

COMMISSIONERS' REPORTS

STAFF UPDATES

POTENTIAL FUTURE AGENDA ITEMS

ADJOURNMENT

SPECIAL NOTICES TO THE PUBLIC

In compliance with the Americans with Disabilities Act and California Law, it is the policy of the City of Los Altos to offer its programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact department staff. Advance notification within this guideline will enable the City to make reasonable arrangements to ensure accessibility.



HISTORICAL COMMISSION AGENDA REPORT

Meeting Date: October 27, 2025

Subject: Election of Chair and Vice Chair

Prepared by: Sean Gallegos, Senior Planner

Attachments: [Commission Handbook](#), dated June 2025

Recommendation

None

Summary

The Commission will nominate and elect a Chair and Vice-Chair to serve until the first meeting in October 2026.

Background

Election of Chair and Vice-Chair: Process Overview

The election of the Chair and Vice-Chair is conducted in accordance with the procedures outlined in the City's *Commission and Committee Handbook*. All commission members are eligible to serve in these leadership roles, provided they meet the outlined requirements. The process is as follows:

1. *Nominations for Chair:*

The current Chair, Commissioner Coe, will formally open the election process by calling for nominations for the position of Chair. Any commission member may nominate a fellow member for the role, and no second is required for a nomination to be valid. Once all nominations have been received, the Chair will close the nomination period. Commissioner Coe currently serves as Vice-Chair and is also eligible for nomination.

2. *Voting for Chair:*

Following the nomination process, the commission conducts a vote to elect the Chair. Voting is typically done by voice vote or show of hands. A simple majority of the members present and voting is required for election. In the event of a tie, voting continues until a candidate receives a majority.

Subject: Election of Chair and Vice-Chair

3. *Nominations and Voting for Vice-Chair:*

After the Chair has been elected, the same process is followed to nominate and elect a Vice-Chair. Members may nominate a fellow commissioner for the Vice-Chair role, followed by a vote requiring a simple majority for election.

Term Limits and Rotation Requirements:

It is important to note that no commission member may serve consecutive terms as Chair. This ensures an annual rotation in leadership and fosters diverse representation in the Chair position. Both the Chair and Vice-Chair serve one-year terms, with elections taking place annually during the commission's first meeting in October.

Chair and Vice-Chair Responsibilities:

The Chair is responsible for presiding over all commission meetings, setting the meeting agenda in collaboration with staff, and ensuring that meetings are conducted in accordance with the City's *Rosenberg's Rules of Order*. The Vice-Chair acts in the absence of the Chair, assuming all duties as necessary.



SPECIAL HISTORICAL COMMISSION MEETING MINUTES

6:00 PM – Monday, August 18, 2025

***Sequoia Room, Los Altos Community Center, 97 Hillview
Avenue, Los Altos, CA***

CALL MEETING TO ORDER

At 6:00 p.m. the Chair called the meeting to order.

ESTABLISH QUORUM

PRESENT: Commissioners Adam, Coe, and Maguire-Negus

ABSENT: Commissioner Atkinson

STAFF: Assistant City Manager Nick Zornes, City Attorney Jolie Houston, Deputy Development Services Director Stephanie Williams, and Senior Planners Sean Gallegos and Brittany Whitehill

PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA

None

CONSENT CALENDAR.

1. Planning Commission Meeting Minutes

Approval of the DRAFT minutes of the Planning Commission's regular meeting of April 28, 2025.

Public Comment

None

Action: Upon a motion by Commissioner Adams, seconded by Commissioner Maguire-Negus, the minutes were approved.

AYES: Adams, Coe, Maguire-Negus NOES: None ABSENT: Atkinson

The motion was approved (3-0).

DISCUSSION

2. 81 Pepper Drive

That the Historical Commission adopt a Resolution removing the property located at 81 Pepper Drive from the City of Los Altos Historic Resource Inventory (HRI); and find the project is exempt from environmental review pursuant to Section 15061(b)(3) of the California Environmental Quality Act (CEQA)

Staff Presentation: Senior Planner, Brittany Whitehill presented the project.

Applicant Presentation: Property owner James Parivash provided a presentation.

Public Comment

Lois Baer, Cristy Elder, Alice Mansell, Thomas Chapman, and Jon Baer provided public comments.

Closed Public comment

Commission Discussion: Commissioners discussed the findings of the evaluations, the determination of historic integrity, and the need for additional review time.

Action: Action: Upon a motion by Commissioner Maguire-Negus, seconded by Commissioner Adams, the Commission continued the item to a future meeting.

AYES: Adams, Coe, Maguire-Negus NOES: None ABSENT: Atkinson

The motion was approved (3-0).

DISCUSSION**3. Historic Preservation, and Mills Act Contracts**

Review and Comment on Proposed Zoning Code Amendments for Historic Preservation, and Mills Act Contracts.

Staff Presentation: Assistant City Manager Nick Zornes provided a presentation on the proposed Historic Preservation and Mills Act Ordinances.

Staff responded to Commission questions.

Public Comment

Alice Mansell, Jon Baer, Katherine Cuervo, Nathan Pooley, Curt Riffle, Karen Scussel, Jennifer Jacobson, Christie Elder, and Leslie Behar provided public comments.

Closed Public comment

Commission Discussion: Commissioners discussed the proposed ordinance revisions and Mills Act ordinance.

Staff responded to questions from the commission.

Action: No action taken

INFORMATIONAL ITEMS

None

COMMISSIONERS' REPORTS AND COMMENTS

None

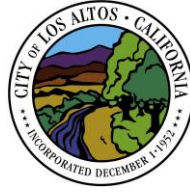
POTENTIAL FUTURE AGENDA ITEMS

None

ADJOURNMENT

Chair Coe adjourned the meeting at 8:22 PM.

Sean Gallegos, Staff Liaison



HISTORICAL COMMISSION AGENDA REPORT

Meeting Date: August 18, 2025

Subject: Request to Remove 81 Pepper Drive from the City of Los Altos Historic Resource Inventory

Prepared by: Brittany Whitehill, Senior Planner

Initiated by: James and Effat Parivash, Property Owners

Attachments:

1. Draft Resolution
2. DPR Form - prepared by Circa
3. Letter from Property Owners, James and Effat Parivash
4. Historic Resource Evaluation - prepared by Evans & De Shazo
5. Historic Resource Evaluation Peer Review - prepared by Page & Turnbull
6. Public Comments

Recommendation

That the Historical Commission adopt a Resolution removing the property located at 81 Pepper Drive from the City of Los Altos Historic Resource Inventory (HRI); and find the project is exempt from environmental review pursuant to Section 15061(b)(3) of the California Environmental Quality Act (CEQA).

Background

Project Site

The property located at 81 Pepper Drive is a 0.23-acre site with a single-family residence constructed in 1929 and a detached garage built circa 1933. In 2008, the property was evaluated as part of a City-wide historic resources survey and identified as an example of the Colonial Revival architectural style in Los Altos. This determination is documented in the DPR Form prepared by Circa (Attachment 2).

According to the DPR Form, the home exhibits character-defining features of the Colonial Revival style, including a side-gabled roof with three gabled dormers, one-and-a-half-story massing, wood lap siding, dentiled cornice, eave returns, six-over-one wood windows (with and without shutters), flat wood trim and simple window moldings, a glazed wood panel front door with sidelights and

wood trim, and a chimney with brick coping. Based on this evaluation, the property was found to be individually eligible for local listing or designation.

Following its inclusion in the Los Altos Historic Resources Inventory Update, the property was officially designated as a Historic Resource in the Los Altos Historic Resources Inventory (HRI). It is not listed on, nor is it considered eligible for state or national historic register designation.

Unpermitted Addition and ADU Conversion

In August 2024, City staff were notified that construction of an addition at the rear of the house had commenced without permits. During a review of the property, staff discovered that the detached garage had also been converted into an Accessory Dwelling Unit (ADU) without permits. It is staff's understanding that the ADU conversion occurred prior to the current owners' purchase of the property.

The Building Division issued a stop-work notice, and the property owners were informed their project would require historical advisory review and design review approvals from the Planning Division, in addition to a Building Permit for the addition and a separate permit to legalize the unpermitted ADU conversion.

In September 2024, the property owners submitted a historical advisory review and design review application for an approximately 800-square-foot, single-story addition at the rear of the house. A building permit application was also submitted in September 2024, to legalize the garage conversion to an ADU; however, they withdrew the application in October 2024 to study alternative approaches to the project.

In January 2025, the owners, James and Effat Parivash, submitted a formal request to remove the property from the City of Los Altos HRI (Attachment 3).

Analysis

Included in the request to remove the property from the Los Altos HRI was a new Historic Resource Evaluation (HRE) prepared by Stacey De Shazo of Evans and De Shazo (Attachment 4). The evaluation was completed by Principal Architectural Historian Stacey De Shazo, M.A., and Architectural Historian Nicole Wyton, M.S., who both exceed the Secretary of the Interior's qualification standards in Architectural History and History, and Researcher Bee Thao, M.A. The HRE prepared by Evans and De Shazo concluded that the property did not meet all the required criteria for local listing described in Los Altos Municipal Code Section 12.44.040. The analysis from the report prepared by Evans and De Shazo is summarized below and provided in its entirety in Attachment 4.

Evans and De Shazo Findings

The HRE prepared by Evans & De Shazo examined the history of the property in detail and evaluated the property for historical significance at the state and local level. Regarding the required criteria for local listing, the assessment presented the following findings:

12.44.040 - Criteria for designation. A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below

- A. Age. A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).*

Evans and De Shazo's HRE finds the 1929 house and 1933 detached garage are over 50 years old and meet this criterion.

- B. Determination of Integrity. A structure or property should retain sufficient historic integrity in most of (3 or more) the following areas:*

- 1. Design: The combination of elements that create the form, plan, space, structure and style of a property.*
- 2. Setting: The physical environment of a historic property.*
- 3. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*
- 4. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*
- 5. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.*

Evans and De Shazo's HRE finds that the property does retain integrity of setting and materials, but does not retain significant integrity of design, workmanship, or feeling.

- C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:*

- 1. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;*
- 2. Person/People: Associated with the lives of persons important to the local, California or national history;*
- 3. Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or*
- 4. Archaeology: Yields important information about prehistory or history of the local area, California or the nation.*

Evans and De Shazo's HRE finds that the property was not clearly associated with any of these areas of significance.

In conclusion, the assessment finds that the property at 81 Pepper Drive only meets one criterion (Criterion A - Age) of the three required criteria for local listing on the City of Los Altos HRI/

Historic Resource Evaluation and Peer Review prepared by Page & Turnbull - Summary of Findings

When a jurisdiction receives two Historic Resource Evaluations with different conclusions, the best practice is to conduct a third party, independent evaluation to arbitrate. Following receipt of the request to remove the property from the local historic register, the City hired Page & Turnbull to conduct an independent analysis of the property and a peer review of the report prepared by Evans & De Shazo, entitled 81 Pepper Drive HRE Peer Review (Attachment 5). Page & Turnbull's peer review and assessment was prepared by Jen Hembree, Cultural Resource Planner, and Stacy Kozakovich, Project Manager, both of whom exceed Secretary of the Interior's qualification standards in Architectural History and History. With regard to the required criteria for local listing, Page & Turnbull's assessment presented the following findings:

12.44.040 - Criteria for designation. A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

- A. Age. A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).*
- B. Determination of Integrity. A structure or property should retain sufficient historic integrity in most of (3 or more) the following areas:*
 - 1. Design: The combination of elements that create the form, plan, space, structure and style of a property.*
 - 2. Setting: The physical environment of a historic property.*
 - 3. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*
 - 4. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*
 - 5. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.*

Page & Turnbull does not concur with Evans & De Shazo's assessment and instead finds that the property does retain integrity in all five of these criteria.

- C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:*
 - 1. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;*
 - 2. Person/People: Associated with the lives of persons important to the local, California or national history;*

3. *Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or*
4. *Archaeology: Yields important information about prehistory or history of the local area, California or the nation.*

Page and Turnbull concurs with Evans and De Shazo that the property was not clearly associated with any of these areas of significance.

Where Evans & De Shazo found that the property met only Criterion A (Age) for local listing under Section 12.44.040, Page & Turnbull determined that the property meets both Criterion A (Age) and Criterion B (Integrity). However, neither firm found that the property satisfies Criterion C (Historic Significance). For this reason, both assessments, though differing in certain findings, conclude the property does not meet all the required criteria for listing in the City of Los Altos HRI.

Environmental Review

The removal of 81 Pepper Drive from the City of Los Altos HRI is exempt from environmental review under the California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which applies when it can be seen with certainty that there is no possibility the activity may have a significant effect on the environment.

Based on the preponderance of evidence presented in both the HRE prepared by Evans & De Shazo and HRE Peer Review prepared by Page & Turnbull, the property does not meet the minimum eligibility criteria for listing on the City of Los Altos HRI. Furthermore, the property has never been listed on a state or national historic register, nor does any evidence suggest that the property has ever been eligible to be listed on any state or national historic register. For these reasons, the property does not qualify as a historic resource as defined by California Code of Regulations Section 15064.5(a). Because the property does not meet the criteria to be eligible for listing on any local, state or national Historic Resource Inventory, it can be seen with certainty that the act of removing from the City of Los Altos HRI will have no significant impact on the environment.

Public Notification

A public meeting notice was posted on the property, mailed to property owners within a 300' radius, and published in the newspaper. The applicant also posted the public notice signs at the site in compliance with the Planning Division posting requirements.

At the time of preparation of the agenda report for the project, two written comments regarding the project have been received by staff (Attachment 6).

RESOLUTION NO. HC 2025-__

A RESOLUTION OF THE HISTORICAL COMMISSION OF THE CITY OF LOS ALTOS TO REMOVE THE PROPERTY LOCATED AT 81 PEPPER DRIVE FROM THE CITY OF LOS ALTOS REGISTER OF HISTORIC RESOURCES

WHEREAS, the property located at 81 Pepper Drive is listed on the City of Los Altos Historic Resource Inventory; and

WHEREAS, the property owners, James and Effat Parivash, submitted an application to the City of Los Altos requesting the property be removed from the City of Los Altos Historic Resource Inventory; and

WHEREAS, pursuant to Section 12.44.060 of the Los Altos Municipal Code the Historical Commission has the authority to list properties on the City of Los Altos Historic Resource Inventory when each of the criteria listed in Section 12.44.040 (Criteria for designation) is met; and

WHEREAS, pursuant to Section 12.44.090 (Termination of designation) stipulates that the only legitimate reason for terminating the designation of a historic resource or historic landmark is when clear evidence is presented that shows the resource no longer meets the criteria of Section 12.44.040 due to loss of integrity and/or historic significance; and

WHEREAS, Based on the preponderance of evidence presented in the Historic Resource Evaluation prepared by Evans & De Shazo and the Historic Resource Evaluation Peer Review prepared by Page & Turnbull, the Historical Commission finds that the property at 81 Pepper Drive does not meet all three required criteria of Los Altos Municipal Code Section 12.44.040 (Criteria for designation) and is therefore not eligible for listing on the City of Los Altos Historic Resource Inventory; and

WHEREAS, the removal of 81 Pepper Drive from the City of Los Altos Historic Resources Inventory is exempt from environmental review under the California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which applies when it can be seen with certainty that there is no possibility the activity may have a significant effect on the environment. Based on the preponderance of evidence presented in both the Historic Resource Evaluation prepared by Evans & De Shazo and Historic Resource Evaluation Peer Review prepared by Page & Turnbull, the property does not meet the minimum eligibility criteria for listing on the City of Los Altos Historic Resources Inventory. Furthermore, the property has never been listed on a state or national historic register, nor does any evidence suggest that the property has ever been eligible to be listed on any state or national historic register. For these reasons, the property does not qualify as a historic resource as defined by California Code of Regulations Section 15064.5(a). Because the property does not meet the criteria to be eligible for listing on any local, state or national Historic Resource Inventory, it can be seen with certainty that the act of removing from the City of Los Altos Historic Resources Inventory will have no significant impact on the environment; and

WHEREAS, the project was processed in accordance with the applicable provisions of the California Government Code and the Los Altos Municipal Code; and

WHEREAS, the Historical Commission held a duly noticed public hearing to consider the request to remove the property at 81 Pepper Drive from the City of Los Altos Historic Resource Inventory on August 18, 2025, and considered the written record and all public comment.

NOW, THEREFORE, BE IT RESOLVED, that the Historical Commission of the City of Los Altos hereby removes the property located at 81 Pepper Drive from the City of Los Altos Historic Resource Inventory, based on the following findings (Exhibit A) and Conditions of Approval (Exhibit B) attached hereto and incorporated by this reference.

EXHIBIT A

FINDINGS

With regard to the request to remove 81 Pepper Drive from the City of Los Altos Historic Resource Inventory, the Los Altos Historical Commission finds that the required criteria in Los Altos Municipal Code Section 12.44.040 cannot be met.

1. Section 12.44.040 Criteria for designation. A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

- A. Age. A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).

This criterion can be met because the property, consisting of the house that was constructed in 1929 and the detached garage that was constructed circa 1933, is older than fifty (50) years in age.

- B. Determination of Integrity. A structure or property should retain sufficient historic integrity in most of the following areas:

This criterion can be met as the property satisfies each of the five sub-criterion of Determination of Integrity, as described below.

- a. Design: The combination of elements that create the form, plan, space, structure and style of a property. This sub-criterion can be met because the house retains the integrity of its design as a single-family home built in 1929 in a modest Colonial Revival style, with character defining features including symmetrical fenestration consisting of rectangular, double-hung multi-light windows, gabled dormers, and a cornice decorated with dentils and eave returns.
- b. Setting: The physical environment of a historic property. This sub-criterion can be met because, although property's setting has changed since the construction of the 1929 house, the setting remains a small neighborhood with modest-sized houses set back from the street and designed in various styles, and that the property retains integrity of setting.
- c. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. This sub-criterion can be met because the house retains original materials, including original wood clapboard siding on three of the four elevations, ten divided light wood windows, two paired divided light windows, and wood shutters on the primary façade; and the detached garage retains some original materials including exterior cladding and some windows.

- d. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. This sub-criterion can be met because, although the detailing of the home is relatively simple, the use of standardized window sash, dentils, shutters, and wood siding does reflect workmanship that would have been characteristic of technological practices of the time, in this instance, the technological advance of mass milling production of the time.
 - e. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time. This sub-criterion can be met because the 1929 house is a modest example of Colonial Revival architecture, specifically the Cape Cod cottage subtype. Although not an excellent example of the Colonial Revival style, given the lack of an accentuated and more elaborate front entry, the house does appear to express the aesthetic of a modest Cape Cod cottage of the 1920s and therefore retains integrity of feeling.
- C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:

This criterion cannot be met because the property is not clearly associated with any of the following areas of historic significance:

- a. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States. This sub-criterion cannot be met. Although the 1929 house is associated with the general trend of growth in Los Altos during the 1920s, the property is not specifically important to this trend and thus does not convey significance for its association with that particular growth period.
- b. Person/People: Associated with the lives of persons important to the local, California or national history. This sub-criterion cannot be met. Although the original owner/occupant of the house, Harry Van Epps, was a carpenter in the “house building” industry, no documentary evidence was found to confirm his involvement in the construction of the 1929 home. The property subsequently changed ownership no less than ten times and no evidence has been identified suggesting that any occupant of the property had particular importance to local, California, or national history owned or occupied the property.
- c. Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value. This sub-criterion cannot be met. While the 1929 house exhibits elements of Colonial Revival style and particularly exhibits the one-story or Cape Cod cottage subtype (due to its form and massing), a subtype built throughout the Colonial Revival decades and that became especially common in the 1940s, the house is a modest representation of the style as shown by its use of wood cladding in lieu of masonry and lack of elaborate front entry, the house thus does not fully exemplify the distinctive characteristics of the Colonial Revival style required to be individually significant, nor

does it exemplify a method of construction, nor does it possess high artistic values. As no architect of record is known, the house does not represent the work of a master.

- d. Archaeology: Yields important information about prehistory or history of the local area, California or the nation. This sub-criterion cannot be met because the property has not yielded any archaeological artifacts that could be important to the prehistory or history of the local area, California or the Nation.
2. The removal of 81 Pepper Drive from the City of Los Altos Historic Resources Inventory is exempt from environmental review under the California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), which applies when it can be seen with certainty that there is no possibility the activity may have a significant effect on the environment. Based on the preponderance of evidence presented in both the Historic Resource Evaluation prepared by Evans & De Shazo and Historic Resource Evaluation Peer Review prepared by Page & Turnbull, the property does not meet the minimum eligibility criteria for listing on the City of Los Altos Historic Resources Inventory. Furthermore, the property has never been listed on a state or national historic register, nor does any evidence suggest that the property has ever been eligible to be listed on any state or national historic register. For these reasons, the property does not qualify as a historic resource as defined by California Code of Regulations Section 15064.5(a). Because the property does not meet the criteria to be eligible for listing on any local, state or national Historic Resource Inventory, it can be seen with certainty that the act of removing from the City of Los Altos Historic Resources Inventory will have no significant impact on the environment.

EXHIBIT B

CONDITIONS OF APPROVAL

- 1. Indemnity and Hold Harmless:** The applicant/owner agrees to indemnify, defend, protect, and hold the City harmless from all costs and expenses, including attorney's fees, incurred by the City or held to be the liability of the City in connection with the City's defense of its actions in any proceedings brought in any State or Federal Court, challenging any of the City's action with respect to the applicant's project. The City may withhold final maps and/or permits, including temporary or final occupancy permits, for failure to pay all costs and expenses, including attorney's fees, incurred by the City in connection with the City's defense of its actions.
- 2. No Development Authorized:** This permit (H25-0001) does not authorize any development or modification to the property and its structures. The property owners must obtain all required Planning and/or Building permits prior to any modifications.

State of California The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial _____
NRHP Status Code _____

Other Listings _____
Review Code _____ Reviewer _____ Date _____

Page 1 of 3 *Resource Name or #: (Assigned by recorder) 81 Pepper Dr.

P1. Other Identifier: _____

*P2. Location: ☐ Not for Publication ☒ Unrestricted

- *a. County Santa Clara and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
*b. USGS 7.5' Quad _____ Date _____ T ____; R ____; ____ of ____ of Sec ____; ____ B.M.
c. Address 81 Pepper Dr. City Los Altos Zip 94022
d. UTM: (Give more than one for large and/or linear resources) Zone ____, ____ mE/ ____ mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate)
APN: 170 41 007

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

This one-and-a-half story, simplified Colonial Revival style residence has a side gable roof with three gabled dormers on the front elevation and a one-story shed extension to the rear. All roof surfaces are clad in composition shingle and the exterior walls appear to be clad in wood lap siding. Notable architectural details include a dentiled cornice along the front elevation and eave returns at the side gables. Six-over-one wood windows with shutters punctuate the first level and six-over-one wood windows are set in the gable dormers. All windows are framed by flat wood trim and simple moulding. The glazed, wood panel front door with sidelights is also framed with this wood trim and sheltered by a modern arbor/trellis. A stucco-clad chimney with brick coping pierces the gable peak. A side-gabled detached garage is set at the northwest corner of the lot.

*P3b. Resource Attributes: (List attributes and codes) HP2. Single family property

*P4. Resources Present: ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5b. Description of Photo:
Primary Elevation

June-08

*P6. Date Constructed/Age and

Source: ☒ Historic ☐ Prehistoric
Both

Built 1933
(Los Altos Planning Dept)

*P7. Owner and Address:
W/K Joseph Living Trust
81 Pepper Dr. Los Altos, CA 94022

*P8. Recorded by:
Circa: Historic Property Development
1 Sutter St., Ste. 910
San Francisco, CA 94104

*P9. Date Recorded: _____
June-08

*P10. Survey Type:
Intensive



*P11. Report Citation:
Los Altos Historic Resources Inventory Update - Phase III (Circa: Historic Property Development, 2011).

*Attachments: ☐ NONE ☐ Location Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other (List): _____

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code CA Reg. 5S3

Page 2 of 3

*Resource Name or # (Assigned by recorder) 81 Pepper Dr.

B1. Historic Name:

B2. Common Name:

B3. Original Use: Residence

B4. Present Use: Residence

*B5. Architectural Style: Colonial Revival Style

*B6. Construction History: (Construction date, alterations, and date of alterations)

Built 1933. Reroof, 1994 (Permit # 44466); W/H (#60954).

*B7. Moved? ☐ No ☐ Yes ☒ Unknown Date: Original Location:

*B8. Related Features:

Detached garage.

B9a. Architect: Unknown

b. Builder: Unknown

*B10. Significance: Theme Residential Architecture/Early Development Area Los Altos

Period of Significance 1933-1961 (50-year mark) Property Type Residential Applicable Criteria CA/Local

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Present day Los Altos became part of Santa Clara County in 1851. Associated with the Fremont Township, the area remained largely rural through the latter half of the 19th century, with much of the land devoted to cultivation of wheat crops, orchards and vineyards. By the end of the century, the larger ranches began to give way to a number of smaller farms and orchards. The initial establishment of Los Altos is attributed to Paul Shoup, a Southern Pacific Railroad executive who proposed it as a stop on a commuter rail line between Palo Alto and Los Gatos. Shoup formed the Los Altos Land Company in 1907 and, with the help of his business partners, purchased and laid out the original townsite along the east side of what is now Foothill Expressway, then the future rail line. The Land Company began selling lots for development in 1907 and many of the early houses were used as summer homes for wealthy San Francisco families while others served as year-round residences for commuters. The first steam train service from Los Altos to San Francisco began in 1908 and by 1911, some fifty residences had been constructed and a number of commercial office buildings had been built in the small downtown core. The rail line brought prosperity and growth to Los Altos and existing farms and orchards gradually gave way to residential subdivisions. Better roads and the availability of the automobile continued this development through the 1920s and 1930s when a number of (See Continuation Sheet).

B11. Additional Resource Attributes: (List attributes and codes)

*B12. References:

Los Altos Historical Commission: Los Altos Historic Resources Inventory (9.28.1997); McAlester, Virginia and Lee. A Field Guide to American Houses. New York: Alfred A. Knopf, 2002; Building permit records; Chamber of Commerce website - http://www.losaltoschamber.org/history_two_cities.html.

B13. Remarks:

Sketch map created by Circa using Google Maps aerial photograph.

*B14. Evaluator: Circa: Historic Property Development

*Date of Evaluation: April 2011

(This space reserved for official comments.)



CONTINUATION SHEET

Primary # _____

HRI # _____

Trinomial _____

Page 3 of 3

*Resource Name or # (Assigned by recorder) 81 Pepper Drive

*Recorded by: Circa: Historic Property Development

*Date April 2011

☒ Continuation ☐ Update

B10. Significance (cont.)

automobile suburbs were developed. The post-World War II population boom led to increased residential and commercial development for the community and the city officially incorporated on December 1, 1952.

The residence at 81 Pepper Drive was constructed in the community's early period of development, prior to the city's incorporation in 1952, and is a good example of the Colonial Revival style in Los Altos. The Eclectic movement, characterized by the popularity of period revival style houses built in the Mediterranean, Italian Renaissance, Tudor, Chateausque or Colonial Revival styles, began in the last decades of the 19th century and came to dominate domestic building in the 1920s and 1930s.

Character Defining Features: Side gable roof with three gabled dormers; one-and-a-half story form, wood lap siding; dentiled cornice; eave returns; six-over-one wood windows with (and without) shutters; flat wood trim and simple moulding around windows; glazed, wood panel front door with sidelights and wood trim; chimney with brick coping.

Evaluation: 81 Pepper Drive is a good representative example of its style, and retains a good degree of integrity of location, workmanship, feeling, design and materials. Therefore, it is eligible for listing on the Los Altos Historic Resources Inventory and is assigned the California Register Status Code 5S3: "appears to be individually eligible for local listing or designation through survey evaluation."

Note: This finding is based on architectural merit alone and further research for association with historically significant events and/or people should be conducted.



JP ENGINEERING & CONSTRUCTION

81 Pepper Drive, Los Altos, CA 94022
Phone: (408) 438-1200 | Email: james@characo.com



Owners

James (Jamshid) Parivash

Effat Parivash

81 Pepper Drive / Los Altos, CA / 94022

408-438-1200

[James@characo.com](mailto:james@characo.com)

March 24, 2025

City of Los Altos

Community Development Department

1 N. San Antonio Road

Los Altos, CA 94022

RE: Request to Remove 81 Pepper Drive from the City of Los Altos Historic Resources Inventory

Dear City of Los Altos Planning Staff,

I am writing to formally request that the property located at 81 Pepper Drive, Los Altos, CA 94022 (APN: 170-41-006) be removed from the City of Los Altos Historic Resources Inventory (HRI).

This request is based on the findings of the Historic Resource Evaluation (HRE) prepared by Evans & De Shazo, Inc., dated March 4, 2025. The report concludes that the existing structures on the property — including the 1929 residence, the ca. 1933 detached garage, and surrounding landscape — do not meet the criteria for individual listing on the California Register of Historical Resources, nor do they appear eligible under the standards of the Secretary of the Interior. As such, the HRE recommends that the property be delisted from the local register.

It is important to note that the HRE was prepared by a licensed historic preservation firm selected from a list of consultants previously provided by the City of Los Altos.

In accordance with the application instructions, I am submitting this letter as part of the required documentation to initiate the City's evaluation and hearing process regarding this request. I understand that a peer review of the HRE may be conducted by an independent consultant selected by the City and that further steps may be required based on that review.

Thank you for your consideration, and I look forward to working with City staff throughout this process.

Sincerely,

Jamshid Parivash

James Parivash

JP Engineering & Construction



EVANS & DE SHAZO

ARCHAEOLOGY HISTORIC PRESERVATION

A HISTORIC RESOURCE EVALUATION AND UPDATED LOCAL ASSESSMENT OF THE PROPERTY AT 81 PEPPER DRIVE, LOS ALTOS, SANTA CLARA COUNTY, CALIFORNIA

SUBMITTED TO:

James Parivash

SUBMITTED BY:

Stacey De Shazo, M.A.
Principal Architectural Historian
and
Nicole Wyton, M.S.
Architectural Historian
with
Bee Thao, M.A.

March 4, 2025
(updated April 21, 2025)

Evans & De Shazo, Inc
1141 Gravenstein Highway South,
Sebastopol, CA 95472
707-823-7400
www.evans-deshazo.com



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INTRODUCTION

Evans & De Shazo, Inc. (EDS) completed a Historic Resource Evaluation (HRE) and updated local assessment for the 0.23-acre property at 81 Pepper Drive, Los Altos, Santa Clara County, California, within Assessor Parcel Number (APN) 107-41-007 (Property). The Property consists of the 1929 house, ca. 1933 detached garage, and landscape. The proposed project consists of rehabilitating or demolishing the 1929 house and demolishing the ca. 1933 detached garage (non-legalized Assessor Dwelling Unit),¹ allowing for the construction of a two-story addition or a new house (Project).² In 2011, as part of the Los Altos Historic Resources Inventory Update (Circa: Historic Property Development, March 2012), the 1929 house was documented on Department of Parks and Recreation (DPR) 523 forms and subsequently locally listed on the Los Altos Historic Resources Inventory (HRI).³ As such, the 1929 house is considered a Historical Resource as defined in Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines. However, the Property, including the 1929 house, ca. 1933 detached garage, and landscape, has not been previously evaluated for individual eligibility for listing on the California Register of Historical Resources (CRHR). As such, EDS completed an HRE to determine whether the Property is eligible for listing on the CRHR. Although the 1929 house is currently locally listed on the Los Altos HRI, the City has requested an “updated” local assessment, completed in accordance with Los Altos Municipal Code Section 12.44.040 to advise the city on the continued local listing of the Property, including the 1929 house.

The HRE follows specific guidelines and evaluation criteria of the California Register of Historical Resources (CRHR, 36 CFR 68; Code of California Regulations [CCR], Title 14, § 15064.5 and Public Resources Code [PRC] § 21084.1). The HRE was completed by EDS Principal Architectural Historian Stacey De Shazo, M.A., and Architectural Historian Nicole Wyton, M.S., both of whom exceed the Secretary of Interior’s qualification standards in Architectural History and History, and Researcher Bee Thao, M.A. The results of the HRE and local assessment are presented herein.

PROPERTY LOCATION

The Property is located at 81 Petter Drive, Los Altos, Santa Clara County, California within APN 107-41-007 (Figure 1). The Property is on the north side of Pepper Drive, approximately 47 feet east of South Antonio Road.

¹ Per the City of Los Altos Permit Search webpage, on 9/17/2024 an application was submitted to the City of Los Altos for the “Legalization of existing detached cottage to an ADU.”

² The Project is dependent on the outcome of the HRE and future decisions by the City of Los Altos for potential delisting of the 1929 house within the Property.

³ The 1929 house was not assigned a “California Register Historic Status Code.”

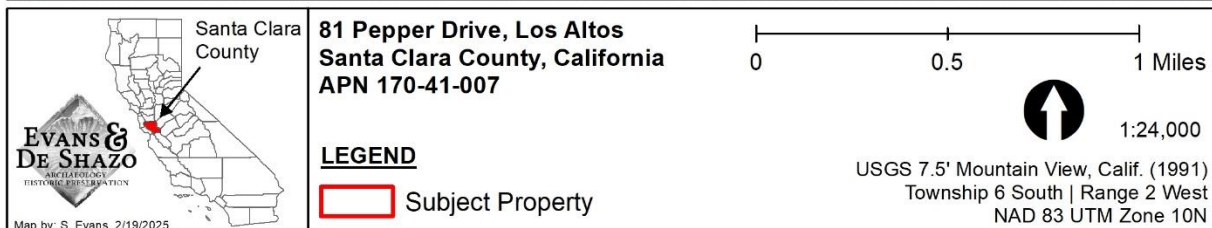
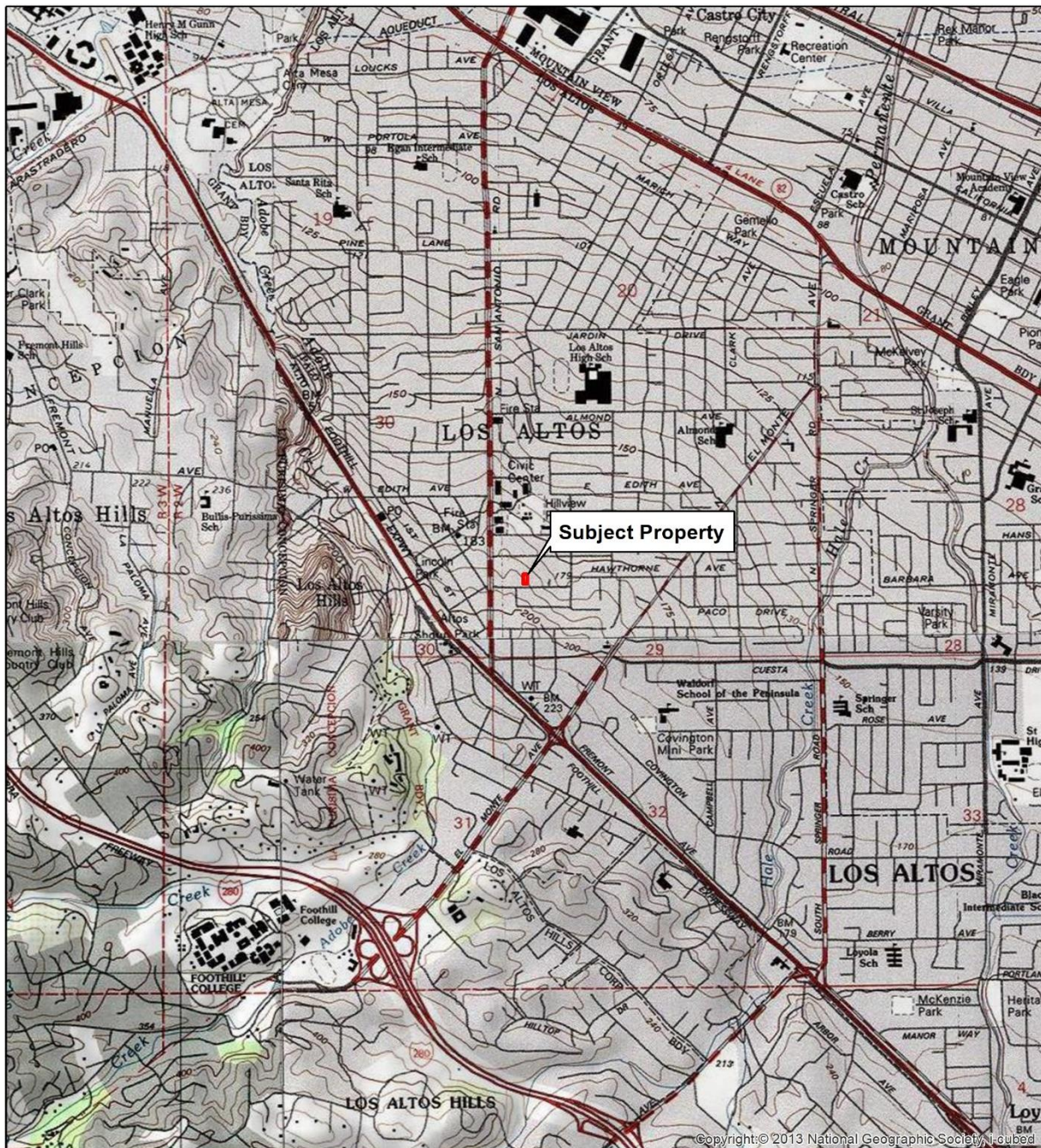


Figure 1. Location Map



REGULATORY SETTING

The CEQA regulations, and the City of Los Altos local historical resources pertaining to cultural resources are outlined below.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA and the Guidelines for Implementing CEQA (State CEQA Guidelines § 15064.5) give direction and guidance for evaluating properties and preparing Initial Studies, Categorical Exemptions, Negative Declarations, and Environmental Impact Reports. Under California State law, the City of Los Altos is legally responsible and accountable for determining the environmental impact of any land use proposal it approves. Cultural resources are aspects of the environment that require identification and assessment for potential significance under CEQA (14 CCR § 15064.5 and PRC § 21084.1).

There are five classes of cultural resources defined by the State OHP. These are:

- **Building:** A structure created principally to shelter or assist in carrying out any form of human activity. A “building” may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.
- **Structure:** A construction made for a functional purpose rather than creating human shelter. Examples include mines, bridges, and tunnels.
- **Object:** Construction is primarily artistic in nature or relatively small in scale and simply constructed. It may be movable by nature or design or made for a specific setting or environment. Objects should be in a setting appropriate to their significant historic use or character. Examples include fountains, monuments, maritime resources, sculptures, and boundary markers.
- **Site:** The location of a significant event. A prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing building, structure, or object. A site need not be marked by physical remains if it is the location of a prehistoric or historic event and if no buildings, structures, or objects marked it at that time. Examples include trails, designed landscapes, battlefields, habitation sites, Native American ceremonial areas, petroglyphs, and pictographs.
- **Historic District:** Unified geographic entities which contain a concentration of historic buildings, structures, or sites united historically, culturally, or architecturally.

According to CCR § 15064.5, cultural resources are historically significant if they are:

- (1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (PRC §5024.1, 14 CCR § 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in PRC § 5020.1(k) or identified as significant in a historical resource survey meeting the requirements PRC § 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of the evidence demonstrates that it is not



historically or culturally significant.

- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC § 5024.1, 14 CCR § 4852), including the following:
 - (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (2) Is associated with the lives of persons important in our past;
 - (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (4) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources pursuant to PRC § 5020.1(k), or identified in a historical resources survey meeting the criteria in PRC § 5024.1(g) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC § 5020.1(j) or § 5024.1.

LOCAL

Although the 1929 house is currently locally listed, the City of Los Altos has requested an "updated" local assessment in compliance with the following criterion.

12.44.040 - Criteria for designation.

A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

- A. Age. A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).
- B. Determination of Integrity. A structure or property should retain sufficient historic integrity in most of the following areas:
 1. Design: The combination of elements that create the form, plan, space, structure and style of a property.
 2. Setting: The physical environment of a historic property.
 3. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
 4. Workmanship: The physical evidence of the crafts of a particular culture or people during any



given period in history or prehistory.

5. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.
- C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:
1. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;
 2. Person/People: Associated with the lives of persons important to the local, California or national history;
 3. Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or
 4. Archaeology: Yields important information about prehistory or history of the local area, California or the nation.

The city's historic resource evaluation methodology, which provides more details about the above listed criteria, is available from the planning division.

(Ord. No. 2011-363, § 1, 3-8-2011; Ord. No. 2017-437, § 1, 3-13-2018)

METHODS

The methods used to complete the HRE included a database search conducted by the Northwest Information Center (NWIC) of the California Historical Information Systems (CHRIS) to determine if the Property has been previously evaluated or documented. EDS also conducted in-person research, including at the Santa Clara County Assessor and Recorder offices, and the City of Los Altos. EDS also conducted extensive online research and reviewed digital documents on file with EDS, such as historical maps, Sanborn Fire Insurance maps, historical aerial photographs, and other primary source documents. EDS also received a copy of the Property's title report provided by the Property owners. The purpose of the research was to understand the Property history and the history of the surrounding area to assist in developing a historical context to evaluate the historical significance of the built environment within the Property. EDS Principal Architectural Historian Stacey De Shazo, M.A. also completed a historic architectural survey to identify the age, any known architectural style or form, character-defining features, materials, and alterations to the built environment resources, at least 45 years in age, within the Property. Updated DPR 523 forms were also completed (Appendix A), as well as a local assessment.

CULTURAL RESOURCE INVENTORIES

As part of the record search, the following inventories were reviewed:

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California Historical Landmarks (CHL)



- California Points of Historical Interest (CPHI)
- California Inventory of Historic Resources
- California OHP BERD for Santa Clara County, California (2020)
- City of Los Altos HRI (2012) and Historic Landmarks

ONLINE RESEARCH

Online research was conducted utilizing the following sources:

- www.newspapers.com
- www.ancestry.com
- www.calisphere.org (University of California)
- <http://www.library.ca.gov/> (California State Library)
- <https://cdnc.ucr.edu/> (California Digital Newspaper Collection)
- <http://pcad.lib.washington.edu> (Pacific Coast Architecture Database [PCAD])
- <https://aiahistoricaldirectory.atlassian.net> (American Architects Directory)

REPOSITORIES

- NWIC Record Search
 - On January 9, 2024, EDS requested a database search from the NWIC (File #24-0987) for the Property. The record search found that the 2011DRP 523 forms (CIRCA) for the Property NWIC.
- Santa Clara County Assessor and Recorder Offices:
 - On January 3, 2025, EDS conducted research at the Santa Clara County Assessor and Recorder Office to gather information regarding the ownership history of the Property.
- City of Los Altos
 - On December 26, 2024, EDS obtained the DPR 523 forms prepared by CIRCA in 2011, and the permit history for the Property from the City of Los Altos.

The research and literature review results are included in the Historical Setting section below.

PREVIOUS DOCUMENTATION

In 2011-2012, the 1929 house within the Property was part of a city-wide historic inventory update (S-34502).⁴ As a result, the 1929 house was listed on the local City of Los Altos HRI in 2012. Due to its current listing, the 1929 house is considered a Historical Resource as defined in §15064.5 of the CEQA Guidelines. However, the documentation of the 1929 house by CIRCA only considered CRHR Criterion 3 (Architecture) and did not

⁴ Study number assigned by the NWIC to the 2012 city-wide HRI.



include an evaluation under criteria 1, 2 or 4; and did not include the ca. 1933 detached garage or landscape.

HISTORICAL SETTING

The following section provides a brief history of the City of Los Altos and a specific history of the Property. The purpose of this section is to provide an understanding of the development of the area and the specific context within which the built environment resources within the Property were evaluated for historical significance.

MEXICAN PERIOD (1822 – 1846)

In 1821, Mexico declared its independence from Spain and took possession of “Alta California,”⁵ marking the end of the Spanish period (1769 – 1821) and the beginning of the Mexican period, also referred to as the “rancho” period, in Alta California. In 1833, the Mexican government secularized the Spanish missions in California, and mission-owned land was dissolved. During this time, extraordinary changes occurred throughout Alta California, as the Mexican government lacked the strong oversight and military rule previously imposed by the Spanish, and as such, there were new trade opportunities when foreign ships that had previously been held off by Spanish guarded military ports could dock and provide a variety of provisions to local settlers throughout California. These new provisions, including tea, coffee, sugars, spices, spirits, and various manufactured goods, soon made their way into the region, and the taxes on these imported goods became the main source of revenue for the Mexican government in Alta California. Likewise, products produced in Alta California were exported, which bolstered the hide and tallow trade that became the primary business activity in Alta California during this time. During this time, the Mexican colonial authorities encouraged the settlement of Alta California by providing large land grants called ranchos to politically prominent persons loyal to the Mexican government and permitting foreigners to settle the land. As a result, the 20 ranchos in Alta California, during the Spanish period increased to roughly 800 ranchos that varied from 10,000 to 20,000 acres during the Mexican era.

In 1846, the Property was within unclaimed lands of the Mexican government.

EARLY AMERICAN PERIOD (1848 - 1851)

The beginning of the American Period in California is marked by the end of the Mexican American War (1846-1848), when the United States (U.S.) took possession of Mexican territories, including California, New Mexico, Texas, and Arizona, in the signing of the Treaty of Guadalupe Hidalgo on February 2, 1848. The Treaty of Guadalupe Hidalgo provided resident Mexicans their American citizenship and guaranteed title to ranchos obtained during the Mexican period. However, less than two weeks before the treaty's signing, on January 24, 1848, James Marshall discovered gold at Sutter's Mill, which marked the start of California's Gold Rush (1848 to 1855). Soon, the excitement of the Gold Rush and the promise of fertile and abundant land brought between 150,000 and 200,000 new settlers to California from all over the U.S. and Scotland, Ireland, England,

⁵ Alta California was a polity of New Spain founded in 1769 and became a territory of Mexico after the Mexican War of Independence in 1821.



Germany, and France.⁶ Many new settlers squatted on land during this time, including Mexican rancho and unclaimed land. To quickly resolve Mexican rancho land disputes, the U.S. Congress passed the California Land Act of 1851, establishing a three-member Public Land Commission (Commission) to determine the validity of prior Spanish and Mexican land grants.⁷ The act required landowners who claimed title under the former Mexican government to file a claim with the Commission within two years. Although the Commission eventually confirmed most of the original Mexican land grants, the burden was on landowners to prove their title. The cost of litigation forced many rancho owners to sell off their land to newly arriving settlers, including some who had illegally squatted on their land, as well as land speculators and the lawyers hired to defend their land claims in court.⁸

In 1850, the Property was within the Fremont township of Santa Clara County within 640 acres of public land surveyed under the Public Land Survey System (PLSS) in the 1850s and made available to new settlers.

HISTORY OF LOS ALTOS (1850 – 1960S)

In 1850, the present-day City of Los Altos comprised approximately 100 residents, mostly living on large parcels of land for wheat farming and cattle ranching. During this time, the Property was located within 640 acres of public land covered in dense chamisal,⁹ and it was surrounded by several Mexican era ranchos, including La Purísima Concepción to the west, San Antonio to the south, Rincon de San Francisquito to the north, and Pastoria de las Boregas to the north/northeast. At this time, the largest landowner within present-day Los Altos was Juana Briones de Miranda's (Figure 2), who purchased the 4,439-acre Rancho La Purísima Concepción in 1844 from José Gorgonio and his son José Ramon, Ohlone Indians who were granted the Rancho by then Mexican Governor Juan Alvarado in 1840.

Juana Briones de Miranda, a single mother with eight children, was a medical practitioner and a well-known San Francisco merchant. Juana moved to Rancho La Purísima Concepción in 1847 and built an adobe house within the northern portion of the land. Following the California Land Act of 1851, Juana filed a claim to the Commission for the rancho land, and with the help of her attorney, Henry Wager Halleck, she fought to retain her land.¹⁰ However, by the early 1860s, Juana had to sell portions of her land to support her family. In 1857, she sold approximately 2,000 acres to Martin Murphy, who had arrived in California in 1844 in the Stephens-Townsend-Murphy Party, the first wagon train to cross the Sierra Nevada into California.¹¹ Martin paid Juana

⁶ Karen Clay, *Property Rights and Institutions: Congress and the California Land Act 1851*, The Journal of Economic History, Cambridge University Press, 59(01):122-142, March 1999.

⁷ The Spanish government-controlled California land from approximately 1770 to 1821 and the Mexican government-controlled California land from 1821 to 1846.

⁸ Nancy Olmsted. *Vanished Waters: A History of San Francisco's Mission Bay*, Mission Creek Conservancy, San Francisco, 1986.

⁹ Chamisal is a Mexican word that means overgrowth of chamiso, an evergreen shrub.

¹⁰ CIRCA Preservation Consulting, "City of Los Altos Historic Resources Inventory", Prepared for the City of Los Altos, 2012.

¹¹ Gordon Richards, "Stephens-Townsend-Murphy Party", Truckee Donner Historical Society, <https://www.truckeehistory.org/the-first-pioneer-wagons-crossed-the-sierra-over-160-years-ago.html>, (accessed 7/22/2024).



\$7,000 for the land, adding to his approximately 4,800-acre land holdings in the present-day City of Sunnyvale, known then as Bay View Ranch.¹² In the early 1860s, Juana sold 2,000 acres to Joseph P. Hale, who established the largest cattle ranch and wheat farm in Los Altos. Along with four other families (names unknown), Hale lived within the ranch, known as Hale Ranch, located west of the Property. In 1862, John Snyder arrived in the Los Altos area, where he purchased land and planted grain within what became known as the Snyder Ranch, which comprised 700 acres, of which some acreage was purchased from Juana. When Juana's land claim was finally patented on August 15, 1871,¹³ most of the Rancho La Purísima Concepción had been sold to Euro-American settlers or granted to Juana's children.

In the 1850s and 1860s, Santa Clara Valley's primary crops were wheat and grain. During this time, farmers living in Los Altos loaded their crops onto wagons, hauling them to the Mountain View Station stage stop, located along the San Francisco-San Jose Stage Road, known today as El Camino Real. In 1864, the Southern Pacific (SP) Railroad established a rail line within present-day Mountain View, approximately one mile north of the Mountain View Station stage stop. In 1865, the City of Mountain View was officially laid out. Due to its proximity to the developing City of Mountain View and the new railroad stop, the small community of Los Altos began to grow. In the 1870s, Los Altos consisted of small and large farms planted with grain and fruit crops. By the 1880s, fruit crops began to replace wheat and grain as the dominant agricultural crop in Santa Clara Valley, and by 1890, many of the larger farms and cattle ranches were subdivided and sold as small farms. During this time, the small farms produced "much as 200 dollars per acre from prunes, apricots, peaches, cherries, pears, and other fruits."¹⁴

In the early 1900s, land development and transportation companies began buying land in Los Altos for future development. During this time, present-day Los Altos saw large tracts of undeveloped land, including where the Property is located (

¹² Los Altos Hills, "Lost Altos Hills History Anthology (1956-2016)", 2016.

¹³ Sacramento State Office, "Report of the Surveyor-General of the State of California from August 1, 1898 – August 1, 1898." 1886.

¹⁴ Jose Salameda, *Memories of Los Altos*, publisher Joe Salameda (January 1, 1982).

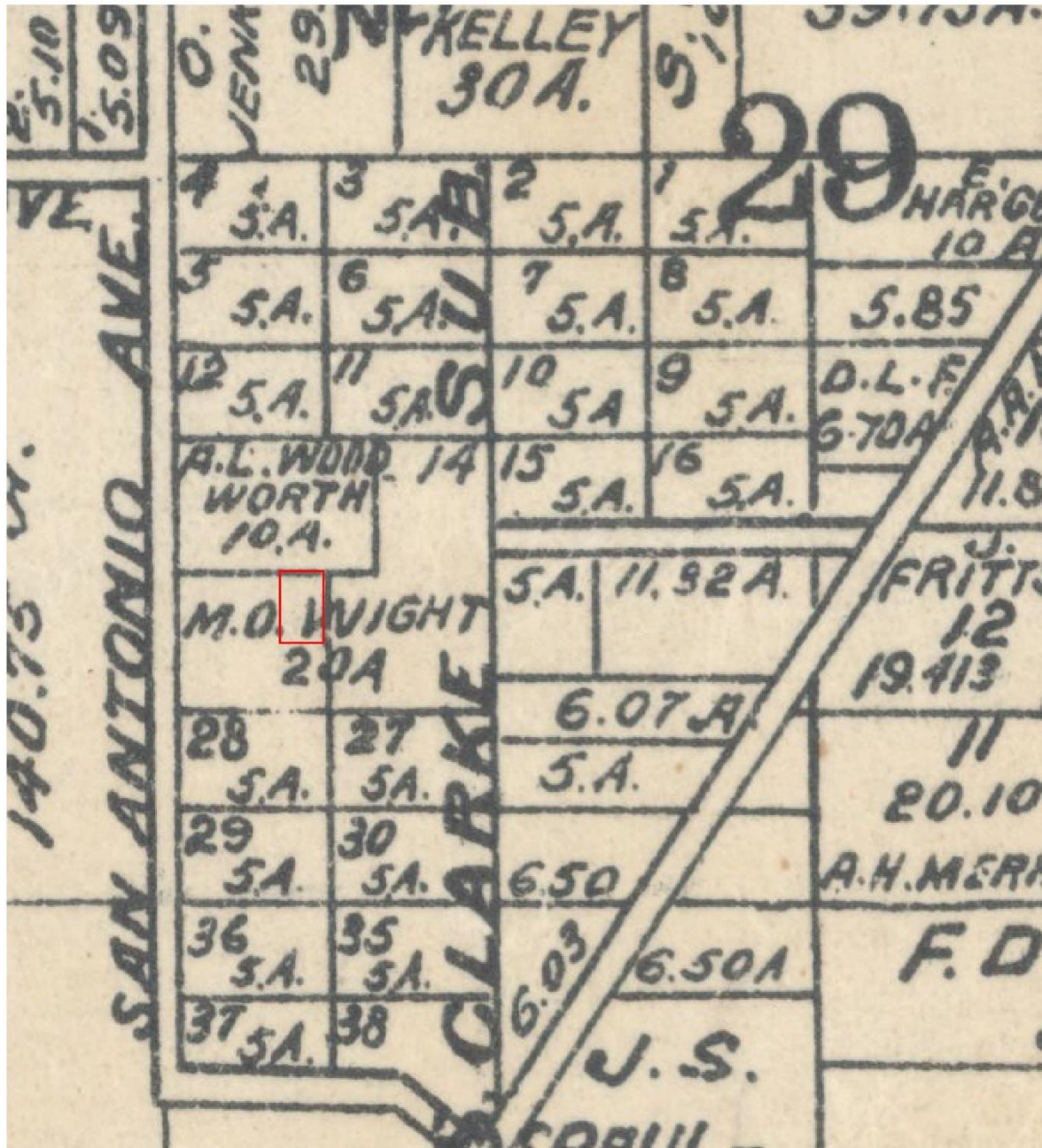


Figure 3), subdivided as part of planned development. In Los Altos, the SP railroad President Paul Shoup and his brother, Guy Shoup, an attorney for the SP, purchased a right-of-way from Palo Alto to Los Altos to run a connecting rail line through Los Gates and points south. This coincided with Paul Shoup's founding of the Altos Land Company in 1906. Paul, who is known as the "father of Los Altos," proposed to link the cities of Palo Alto and Los Gatos with a new rail line through present-day Los Altos; however, the route where the rail line was proposed to be located was within two adjoining parcels owned by rifle heiress Sarah Winchester, who did not want the rail line to split the two adjacent parcels. On October 19, 1907, the Altos Land Company was incorporated with Paul Shoup as its director. Soon after its incorporation, the SP railroad acquired the company as the newly formed subsidiary, Peninsular Railway. Although the Altos Land Company failed to



purchase the right-of-way through Sarah Winchester's property, they offered to buy both lots from her instead. She accepted the offer, which allowed the Altos Land Company to move ahead with its plan to develop the small community. The Altos Land Company kicked off its development plans by sponsoring outdoor land sale events, which coincided with the construction of the new SP route from Palo Alto to Los Altos to provide train service through Los Altos. On April 19, 1908, the SP train service opened in Los Altos, with five trains per day along the route of the present-day Foothill Expressway.

During the early 1900s, the Altos Land Company continued its marketing campaign to sell lots for development to support its new rail line by promoting Los Altos as "the loveliest place on the peninsula" (Figure 4 and Figure 5). As part of their marketing efforts, residents of San Francisco were offered free railroad excursions in the country for a day, with complimentary picnics alongside the tracks where lots were being sold. By 1911, fifty new houses had been constructed within Los Altos, and several office buildings and stores had been built along Main Street (Figure 6). The 10-acre lots were priced from \$400 to \$650, and homes could be built from \$2,000 to \$4,000. The 10-acre lots were also laid out to support small family-owned fruit farmers, including those along Hawthorne Avenue. Shoup then laid out the town of Los Altos, and the first business to open in downtown Los Altos was Eschenbruecher's Hardware Store at 316 Main Street, which also housed the post office. The Los Altos Water Company, Los Altos Building and Loan, University Land Company, and the railroad company also occupied offices in downtown Los Altos. In 1909, the two-story Shoup Building was constructed at Main and Second streets, which housed a grocery store downstairs, managed by Paul Shoup's brother-in-law, Al Robinson, while the second floor was used as a school, where one teacher taught first through eighth grade. In 1914, the SP constructed a new train depot in Los Altos (Figure 7). During this time, the railroad, particularly the electric streetcar, was vital in opening the suburbs to lower and middle-income residents. Between 1910 and 1930, Los Altos prospered as a small town supported by small family-owned orchards and working-class residents who commuted to areas such as San Jose and San Francisco. During this time, small subdivisions developed, and new roads were constructed; however, housing construction within the new subdivisions was slow.

During the early 1900s, Los Altos residents were mainly of European descent. According to the 1910 U.S. Federal Census, no African Americans lived in Los Altos, and there was only one Japanese family and three single Japanese men working as servants, gardeners, or cooks.¹⁵ By the 1920s, the number of Japanese residing in Los Altos had increased, making up approximately 22% of Los Altos' population; however, there were very few Chinese and only three African Americans residing in Los Altos. During the 1920s, many Japanese Americans and Japanese immigrants found work on the numerous fruit orchard farms throughout Santa Clara Valley, including Los Altos. Most Japanese leased land due to the restrictive and discriminatory land legislation under the California Alien Land Law of 1913, making it difficult for Japanese to own property. However, some Japanese Americans, such as George Furuichi and his family, found a way to purchase property. They moved to Los Altos in 1918 and bought five acres of land on Hawthorne Avenue, 0.2 miles southeast of the Property, where they planted fruit trees. During this time, the Furuichi family appeared to have been the only Japanese family that owned property within Los Altos. By the late 1920s, Los Altos had

¹⁵ CIRCA Preservation Consulting, "City of Los Altos Historic Resources Inventory", Prepared for the City of Los Altos, 2012.



remained a small town with 10-acre lots slowly being developed with housing.

In 1929, the U.S. entered into the Great Depression (1929 – 1933), which had created a surge of bank closures, resulting in decreased available capital that impacted agriculture and reduced market prices. In 1933, five days after taking the oath of office, Roosevelt called a conference with the Agriculture, Interior, War secretaries, and several others to discuss his ideas for recruiting 500,000 men to work in the nation's forests and eroded farmlands. Roosevelt's vision was to provide work opportunities, primarily for young men, to repair the land from decades of poor management and over-use, which became known as the "New Deal." As part of the New Deal, on March 31, 1933, the Emergency Conservation Work (ECW) Act was established under Executive Order No. 6101, which created the Civilian Conservation Corps (CCC) and the Works Progress Administration (WPA). The CCC and the WPA were established to create work opportunities that would not interfere with regular employment. As such, they were explicitly directed toward the conservation of natural resources. The Public Works Administration (PWA) was established six years later, in 1939, and was created by the National Industrial Recovery Act of 1933 (NIRA). The PWA projects included extensive improvements, and infrastructure, such as roads, allowing for the growth and recovery of the Santa Clara Valley and Los Altos.

The 1940s brought significant change to the U.S. when, on December 7, 1941, Japan bombed Pearl Harbor, Hawaii, and the U.S. declared war on Japan, marking the entrance of the U.S. into World War II (WWII). Suspecting potential spies within the Japanese American population, the U.S. government quickly enacted a series of measures to restrict the travel of Japanese Americans and Japanese immigrants to the U.S. and Hawaii. On February 19, 1942, President Roosevelt signed Executive Order 1066, which authorized the internment of 120,000 people of Japanese descent, including Nisei, who were Japanese Americans born to Japanese parents, and Issei, who were the first generation of Japanese to immigrate to the U.S., in 11 camps located across seven states. In March 1942, Japanese American communities throughout Santa Clara County, including Los Altos, were ordered to report to temporary Wartime Civil Control Administration (WCCA) camps (aka assembly centers), including the Tanforan Racetrack in San Bruno. Upon arrival, many lived in former horse stalls before being transferred to "relocation centers," such as Topaz in Central Utah. In 1942, well-known Los Altos Japanese American George Furuichi and his family were sent to the Heart Mountain Relocation Center in northwest Wyoming. In 1943, George was recruited by the U.S. Army during his internment, and he served as part of the famed U.S. Japanese "Go for Broke" 442 Regimental Combat Team. After WWII ended in 1945, towns and cities grew as they saw the return of U.S. soldiers and returning Japanese residents released from internment camps. The War Relocation Authority (WRA) gave each Japanese resident \$25 in cash and a train or bus ticket back to their hometowns. Some Japanese residents returning home found their belongings stored by churches or trusted neighbors. In contrast, others discovered their homes and businesses in disarray, and their things were often stolen or broken.¹⁶ Unlike many Japanese Americans who lost everything during their internment, George Furuichi and his family were able to retain their land, which was maintained and protected by close friends during their internment. In 1947, George, his sister Helen, and his cousin Tom, who were also interned during WWII, opened the Los Altos Nursery on Hawthorne Avenue, which the Furuichi family owned until 2018.

¹⁶ James C Williams, and Kent Seavey. "Gilroy Yamato Hot Springs National Register of Historic Places Nomination", (NR#95000996), Washington, DC: National Park Service, 1995.



During the late 1940s, Los Altos and Santa Clara County experienced tremendous job growth related to new industries, including the electronic and defense industries, resulting in a manufacturing boom (Figure 9). During this time, the town of Los Altos, like many other cities throughout the U.S., saw a housing boom with the return of soldiers after WWII. Between 1946 and 1952, Los Altos school enrollment increased nearly 400% during the influx of new residents. As the town grew, Los Altos residents worried that either Palo Alto or Mountain View would annex the growing town. In 1952, the citizens of Los Altos voted to incorporate the City of Los Altos, becoming the eleventh City in Santa Clara County.

By the 1960s, the economy was booming, and new residential housing construction continued. In 1960, the population of Los Altos reached 19,696. By this time, the automobile had replaced the train as the primary mode of transportation, and in 1964, the SP railroad ceased operations in Los Altos. During the 1970s, the technology industry was beginning to grow, and downtown Los Altos consisted of commercial buildings, restaurants, and a movie theater (Figure 10). In 1976, Apple co-founders Steve Jobs and Steve Wozniak built the first 50 “Apple I” computers in Jobs’ parents’ garage in Los Altos.



Figure 2. Undated photograph of Juana Briones de Miranda (courtesy of the NPS).

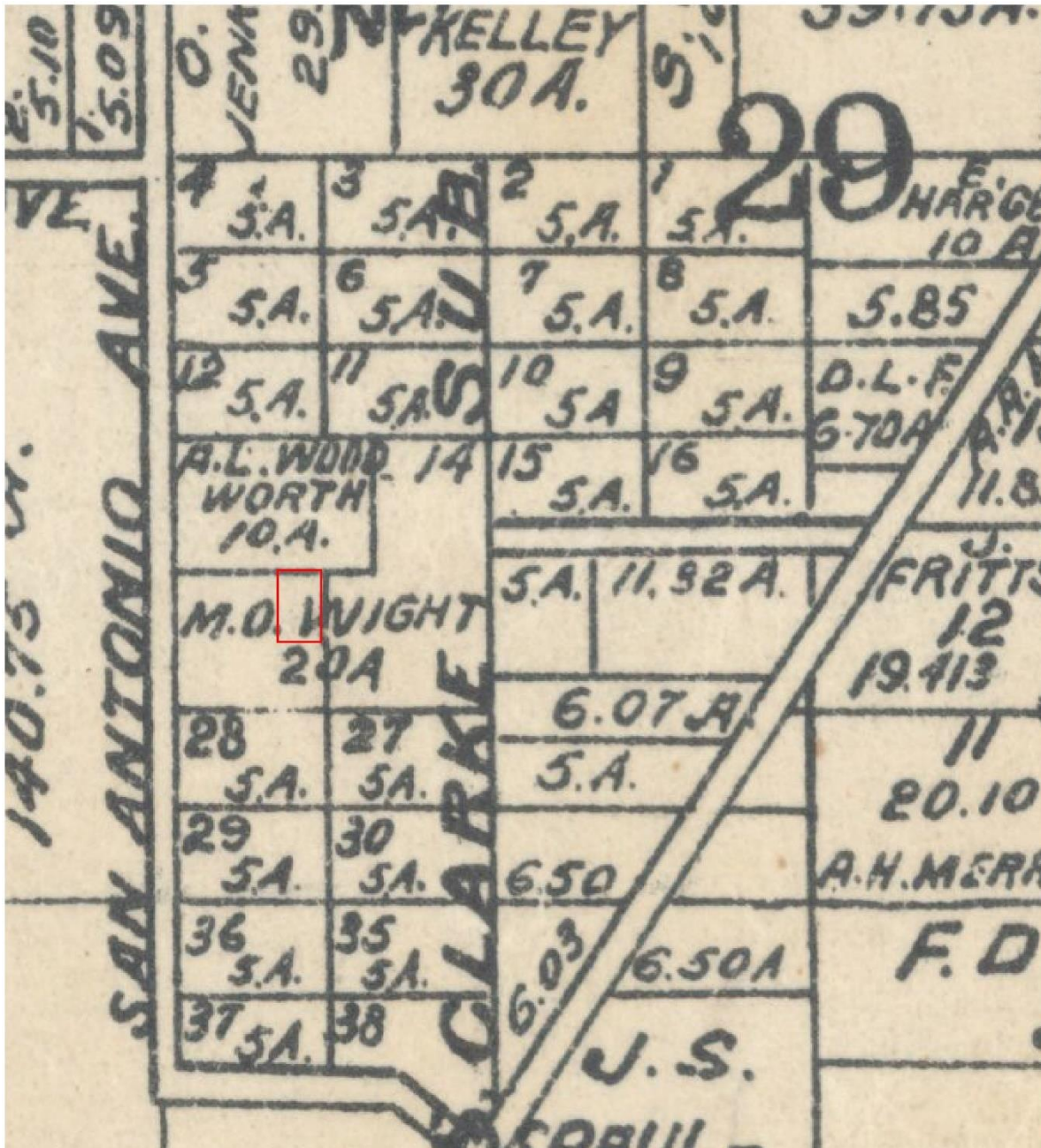


Figure 3. The 1910 Santa Clara County map shows the location of the Property (outlined in red) within M.O. Wight's 20-acre property in the L.S. Clark Subdivision, later subdivided as part of the Adams Subdivision (courtesy of the Stanford University Library).

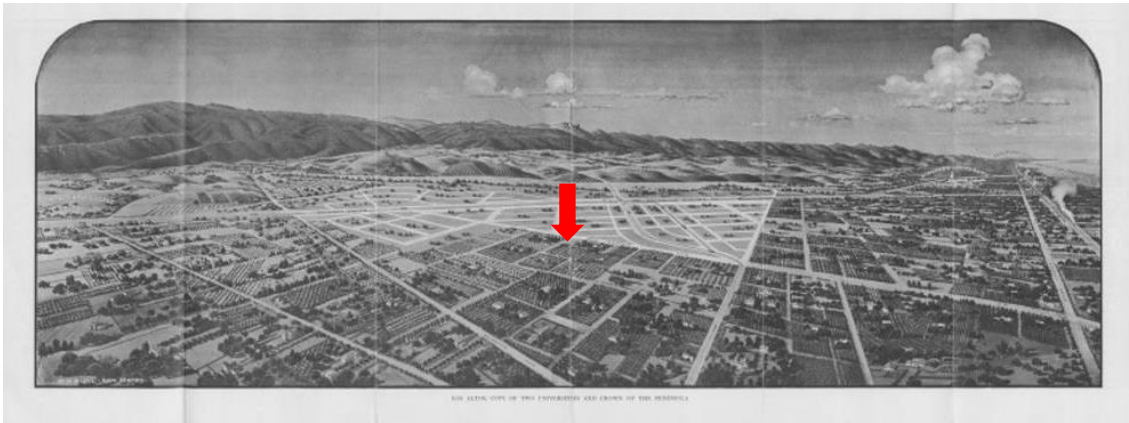


Figure 4. ca. 1907 bird's eye view drawing of the developing community of Los Altos; showing the approximate location of the Property – red arrow (courtesy of the Los Altos History House Museum Archives).

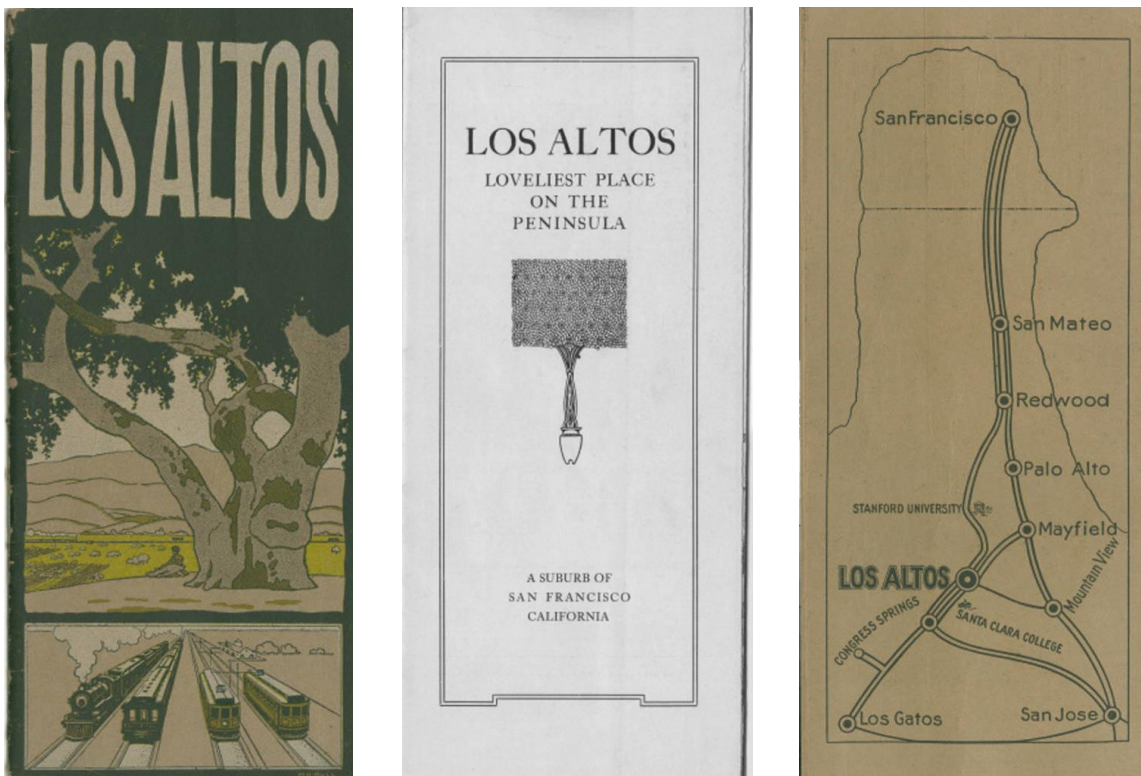


Figure 5. A marketing brochure from the Altos Land Company advertising Los Altos as the loveliest place on the peninsula (courtesy of the Los Altos History House Museum Archives).

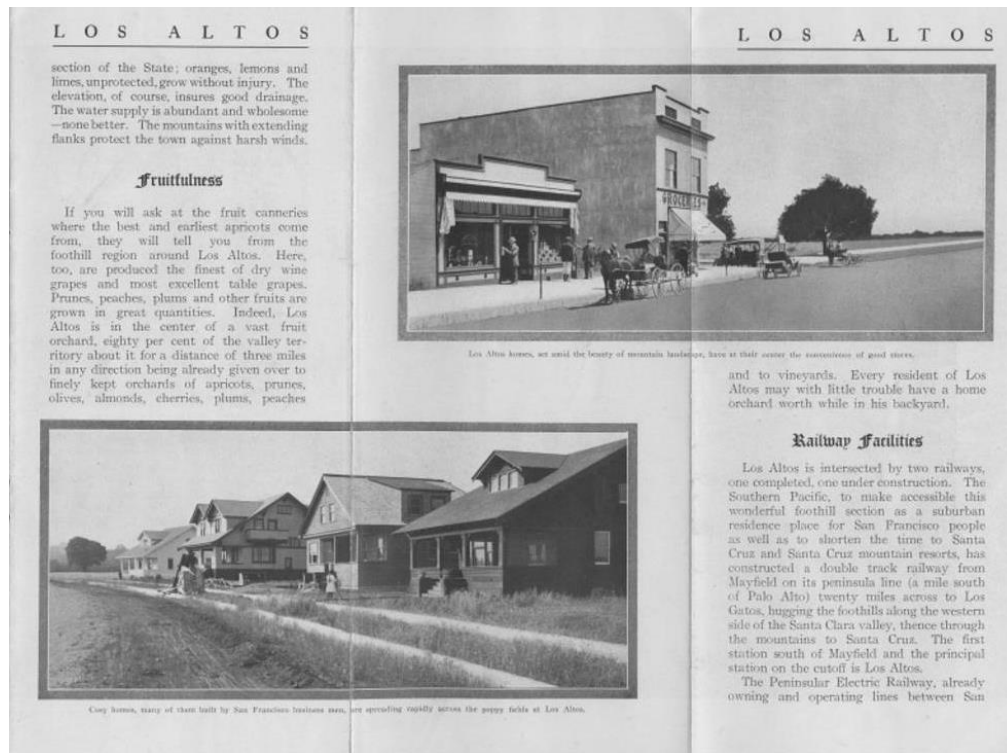


Figure 6. Advertisement from the Altos Land Company, advertising Los Altos as the loveliest place on the peninsula (courtesy of the Los Altos History House Museum Archives).



Figure 7. ca. 1920 photograph of the 1913 Southern Pacific Railroad depot in Los Altos (courtesy of the Los Altos History House Museum Archives).



Figure 8. ca. 1930 photograph of George Furuichi (third from the right) and other Japanese workers. The location may have been within his property on Hawthorne Avenue (courtesy of the Los Altos History House Museum Archives).



Figure 9. 1944 aerial photograph of downtown Los Altos (courtesy of Don McDonald).



Figure 10. 1970s photograph of downtown Los Altos (courtesy of the Los Altos History Museum).

PROPERTY HISTORY

In the late 1840s, the Property was part of unclaimed public land acquired by the U.S. government in 1848. By 1865, the Property was surveyed under the PLSS and became part of a 640-acre property covered with chamisal, a term for the overgrowth of chamiso, an evergreen shrub. By 1895, the Property was within Lot 20 of the L.S. Clarke subdivision (Figure 11) and by the 1920s, was part of the Adams Subdivision (Figure 12).

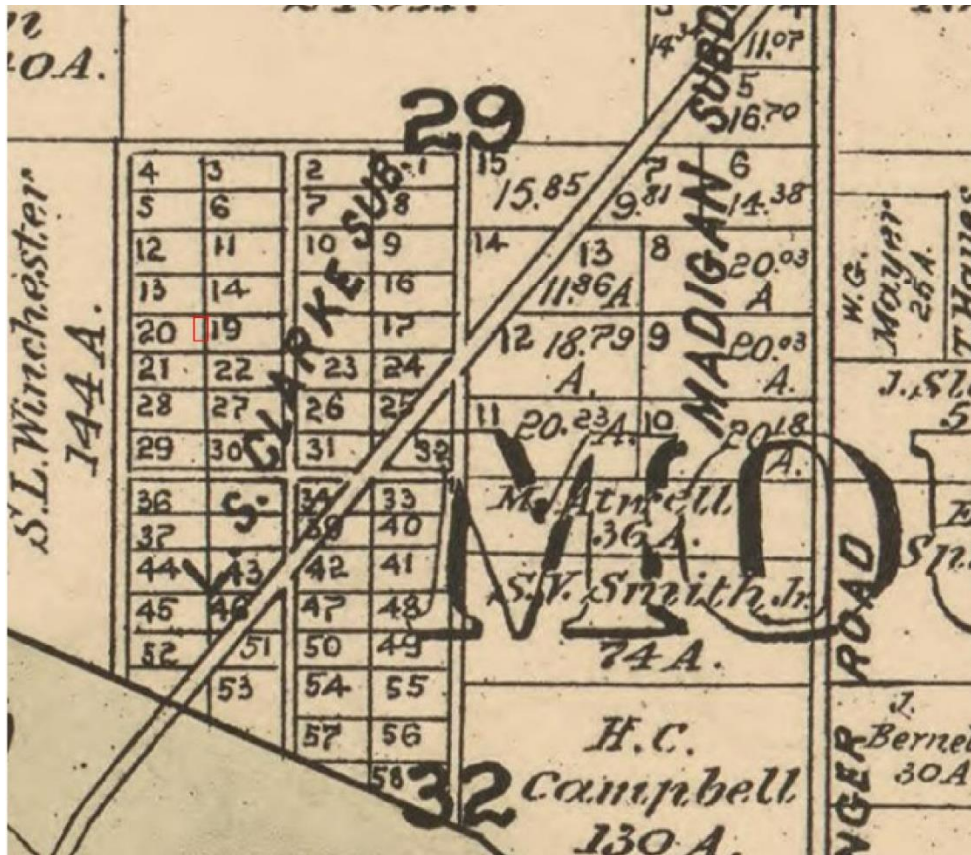


Figure 11. 1895 Hermann Bros., Official Map of Santa Clara County.

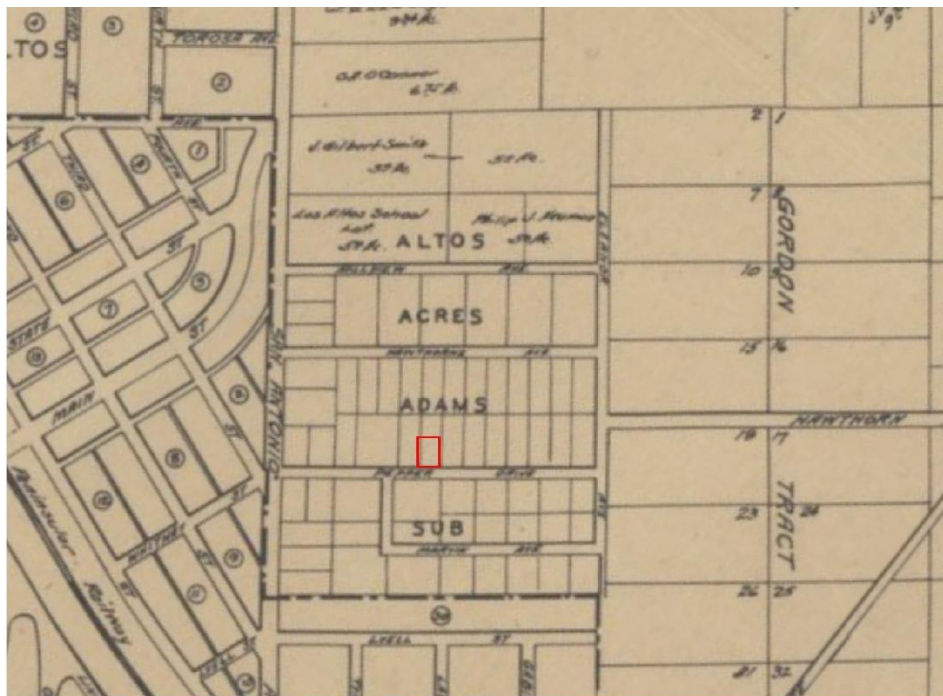


Figure 12. By 1920, the Property was part of the Adams subdivision (1926 Miller, Regional Map of the City of Palo Alto, California; courtesy of the Los Altos History House Museum Archives).



Table 1. Owners and Occupants History

1929 House, ca. 1933 Detached Garage, and Landscape		
Year(s)	Owners/Occupants	Details
1928-1945	Owners: Harry Putnam Van Epps and Grace (née Lane) Van Epps	• The property's first owners were Harry P. and Grace Van Epps. • Harry Putnam was born May 22, 1884, in Turner, South Dakota to George and Elizabeth Van Epps.¹⁷ Grace Elizabeth was born April 27, 1891, in Independence, Iowa to George and Nettie Lane.¹⁸ They married on June 23, 1914, in Roundup, Montana.¹⁹ They had two daughters, Gwendolyn Irma and Alice Virginia.²⁰ • Per the 1920 Federal Census, the family lived in Hardin, Montana, where Harry was a farmer.²¹ George and Elizabeth Van Epps (Figure 13) moved to California in 1902.²² In 1928, they purchased the Property where they constructed the 1929 house, beginning construction in July, and moving into the house in December (Figure 14 and Figure 15).²³ Per the 1930 Federal Census, Harry worked as a carpenter, building houses, while Grace tutored students from their home.²⁴ In ca. 1933, the detached garage was constructed (Figure 16), likely by Harry. During this time, it appears the rear shed addition was added to the northeast corner of the house. • In 1945, Harry and Grace sold the Property and moved to 214 Lylle Street in Los Altos. • Grace died on December 22, 1958.²⁵ Harry died April 24, 1968, in Paradise, California.²⁶
1945-1947	Owners: Boyd G. Oliver and Anne Marie (née Cook) Oliver	• The subsequent owners of the Property were Boyd G. and Anne Marie Oliver. • Boyd Golden was born February 20, 1911, in Denver, Colorado to Neno G and Myrtle Oliver.²⁷ Boyd married Daunus Nolan on December 6,

¹⁷ Ancestry.com, "Harry Putnam Vanepps," *South Dakota, U.S., Birth Index, 1856-1918*.

¹⁸ Ancestry.com, "Grace Elizabeth Lane," *Iowa, U.S., Births and Christenings Index, 1800-1999*.

¹⁹ Ancestry.com, "Harry Putman Van Effs," *Montana, U.S., County Marriages, 1865-1987: Musselshell, Marriage Records, Vol 1-2 1911-1921*.

²⁰ Ancestry.com, "Harry P Van Epps," *1930 United States Federal Census: California, Santa Clara County, Fremont, District 0121*.

²¹ Ancestry.com, "Grace E Van Epps," *1920 United States Federal Census: Montana, Big Horn County, Hardin, District 0004*.

²² Newspapers.com, "George Van Epps Claimed by Death," *The Peninsula Times Tribune*, August 26, 1931.

²³ Newspapers.com, "To Occupy New Home," *The Peninsula Times Tribune*, December 5, 1929.

²⁴ Ancestry.com, "Harry P Van Epps," *1930 United States Federal Census: California, Santa Clara County, Fremont, District 0121*.

²⁵ Ancestry.com, "Grace Elizabeth Van Epps," *U.S., Find a Grave® Index, 1600s-Current*.

²⁶ Ancestry.com, "Harry Putnam Van Epps," *U.S., Find a Grave® Index, 1600s-Current*.

²⁷ Ancestry.com, "Boyd Golden Oliver," *U.S., Social Security Applications and Claims Index, 1936-2007*.



1929 House, ca. 1933 Detached Garage, and Landscape

Year(s)	Owners/Occupants	Details
		1932, in Walsenburg, Colorado.²⁸ They divorced on February 26, 1936.²⁹ • Anne Marie Cook was born May 1, 1911, in Los Angeles.³⁰ • In October 1936, the newspaper announced the future marriage of Boyd Oliver and Anne Marie Cook.³¹ At the time of the 1930 Federal Census, Boyd and Anne lived in Monrovia, California, where Boyd worked as a machine operator.³² They had two sons, Verlin and Kenneth.³³ By 1950, Boyd was a proprietor of a saddle shop, known as Oliver Saddle Shop.³⁴ By 1977, the business was renamed Oliver's Leather Goods and Saddles.³⁵ • Boyd died January 26, 1994.³⁶ Anne died December 20, 1996, in San Benito.³⁷
1947	Owners: Rudolf Hennes and Stephanie Hennes	• The subsequent owners of the Property were Rudolf Hennes and Stephanie Hennes. • Rudolf Fredrich Hennes was born October 3, 1896, in Auerbach, Germany.³⁸ Per the 1920 Federal Census, he immigrated to the U.S. in 1914, and worked at a creamery.³⁹ Rudolf was naturalized on July 20, 1928.⁴⁰ • Stephanie Hennes was born September 15, 1906, in Vienna, Austria.⁴¹ • Rudolf and Stephanie were married September 19, 1931.⁴² The couple

²⁸ Ancestry.com, "Boyd G Oliver," *Colorado, U.S., County Marriage Records and State Index, 1862-2006: Statewide Marriage Index, O-Os, All*.

²⁹ Ancestry.com, "Boyd G Oliver," *Colorado, Divorce Index, 1851-1985*.

³⁰ Ancestry.com, "Cook," *California Birth Index, 1905-1995*.

³¹ Newspapers.com, "Intend to Wed," *Progress-Bulletin*, October 9, 1936.

³² Ancestry.com, "Boyd Aliver," *1940 United States Federal Census: California, Los Angeles County, Monrovia, 19-372*.

³³ Ancestry.com, "Boyd G Oliver," *1950 United States Federal Census, California, Santa Clara County, San Jose, 73-123*.

³⁴ Ancestry.com, "Boyd G Oliver," *U.S., City Directories, 1822-1995: California, San Jose, 1963, San Jose, California, City Directory, 1963*.

³⁵ Ancestry.com, "Boyd G Anne M Oliver," *U.S., City Directories, 1822-1995: California, San Jose, 1977, San Jose, California, City Directory, 1977*.

³⁶ Ancestry.com, "Boyd G. Oliver," *U.S., Social Security Death Index, 1935-2014*.

³⁷ Ancestry.com, "Anne Marie Oliver," *California, U.S., Death Index, 1940-1997*.

³⁸ Ancestry.com, "Rudolf Fredrich Hennes," *U.S., World War II Draft Registration Cards, 1942: California, All, Burgess, Charles Dana - Masetti, Vincenzo*.

³⁹ Ancestry.com, "Rudolph Hennes," *1920 United States Federal Census: California, Stanislaus County, Newman, District 0176*.

⁴⁰ Ancestry.com, "Rudolf," *California, U.S., Federal Naturalization Records, 1888-1991: District Court, Northern District, California: San Francisco, Petition 29320 Andreas Peter Sofianopoulos 1933: Petition 29590 John McCarthy 1934*.

⁴¹ Ibid.

⁴² Ibid.



1929 House, ca. 1933 Detached Garage, and Landscape		
Year(s)	Owners/Occupants	Details
		had four children, Doris, Joan, Leila and Louise. ⁴³ • Rudolf then worked as a painting contractor, which remained his career until he died in June 1961.⁴⁴ ⁴⁵ Stephanie died June 22, 1986.⁴⁶
1951-1959	Owners: Edwin J. Gates and Queen J.S. Gates	• The subsequent owners of the Property were Edwin J and Queen D. Gates. • Edwin James Gates was born March 18, 1881 in Illinois.⁴⁷ Edwin married Jessie H. Shoger in 1902 in Kendall, Illinois.⁴⁸ In 1910, Edwin and Jessie in Oswego, Illinois, where Edwin worked as a farmer.⁴⁹ By 1920, the couple moved to Litchfield, Minnesota, where Edwin worked as a Vulcanizer – strengthening the flexibility and durability of rubber.⁵⁰ By 1930, the they lived in Palo Alto, where Edwin worked as a salesman for a farm.⁵¹ In 1940, Edwin worked as a mechanic. Jessie is not shown as having an occupation.⁵² Jessie died September 19, 1943.⁵³ • Edwin then married Queen (Queenie) Antoinette Doris in the 1940s.⁵⁴ Queen was born in Chicago, Illinois on April 26, 1890 to Alfred and Augusta Dahlberg.⁵⁵ Per the 1920 Federal Census, Queen lived in Kansas City, Missouri, was a widow, and had a live-in maid.⁵⁶ Queen was married to a man with the surname Nye, and together, they had a son, William, who was born ca. 1913. During this time, Queen worked as a

⁴³ Newspapers.com, "Deaths: Hennes," *The Peninsula Times Tribune*, June 24, 1986.

⁴⁴ Ancestry.com, "Rudolph Hennes," *1940 United States Federal Census: California, San Francisco County, San Francisco*, 38-266.

⁴⁵ Newspapers.com, "Death Claims Rudolf Hennes of Mt. View," *The Peninsula Times Tribune*, June 12, 1961.

⁴⁶ Newspapers.com, "Deaths: Hennes," *The Peninsula Times Tribune*, June 24, 1986.

⁴⁷ Ancestry.com, "Edwin James Gates," *U.S., World War II Draft Registration Cards, 1942: California, All, Bacchi, Ray - Jones, Abner*.

⁴⁸ Ancestry.com, "Edwin J. Gates," *Illinois, U.S., County Marriage Records, 1800-1940*.

⁴⁹ Ancestry.com, "Edward J Gates," *1910 United States Federal Census: Illinois, Kendall County, Oswego, District 0071*.

⁵⁰ Ancestry.com, "Edwin J Gates," *1920 United States Federal Census: Minnesota, Meeker County, Litchfield, District 0128*.

⁵¹ Ancestry.com, "Edwin J Gates," *1930 United States Federal Census: California, Santa Clara County, Palo Alto, District 0019*.

⁵² Ancestry.com, "Edwin J Gates," *1940 United States Federal Census: California, San Mateo County, Other Places, 41-65*.

⁵³ Newspapers.com, "Deaths: Gates," *The Peninsula Times Tribune*, September 20, 1943.

⁵⁴ Ancestry.com, "Queen Gates," *1950 United States Federal Census: California, San Mateo County, Other Places, 41-254*.

⁵⁵ Ancestry.com, "Queen Antoinette Doris Gates," *U.S., Find a Grave® Index, 1600s-Current*.

⁵⁶ Ancestry.com, "Queenie Nye," *1920 United States Federal Census: Missouri, Jackson County, Kansas City Ward 13, District 0202*.



1929 House, ca. 1933 Detached Garage, and Landscape		
Year(s)	Owners/Occupants	Details
		cashier.⁵⁷ Queen married Osborne Swan in ca. 1935.⁵⁸ Per the 1940 Federal Census, Queen and Osborne lived in Los Angeles, and Queen worked as a book clerk.⁵⁹ Osborne died in 1940.⁶⁰ • Edwin died October 14, 1961.⁶¹ Queen died on November 21, 1966, in Mountain View.⁶²
1959-1961	Owners: Frank M.L. Frankfurt and Grace M. Frankfurt	• The subsequent owners of the Property were Frank and Grace Frankfurt. • Frank and Grace owned and operated the Frankfurt Realty and Investment Co.⁶³ The company operated from 1955 to 1963.⁶⁴ • Frank and Grace were married in June 1945.⁶⁵ • No further information regarding either Frank or Grace was found.
1961-1962	Owners: Troy R. Mansker and Doris Mansker	• The subsequent owners of the Property were Troy R. and Doris Mansker. • Troy Roy was born May 8, 1923, in Pope County, Arkansas.⁶⁶ Doris E. Waudby was born September 7, 1925.⁶⁷ Troy was enlisted in the Army, serving as a Private in the Infantry from December 9, 1942 to December 22, 1945.⁶⁸ Troy and Grace were married on June 8, 1944, in Nashua, Iowa.⁶⁹ Together, they had three daughters, Janice, Patricia and JoAnn and a son, Phillip.⁷⁰ • After Troy was discharged from the Army, the family lived in Iowa, where Troy worked as a life insurance salesman.⁷¹ By 1951, the family

⁵⁷ Ancestry.com, "Queenie Nye," 1930 United States Federal Census: Missouri, Jackson County, Kansas City, District 0200.

⁵⁸ Ancestry.com, "Osborne Swan," U.S., Newspapers.com™ Marriage Index, 1800s-current.

⁵⁹ Ancestry.com, "Osborn Swan," 1940 United States Federal Census: California, Los Angeles County, Los Angeles, 60-936.

⁶⁰ Findagrave.com, "Osborne Sheffield Swan," accessed February 27, 2025, https://www.findagrave.com/memorial/228617776/osborne_sheffield-swan

⁶¹ Ancestry.com, "Edwin James Gates," U.S., Find a Grave® Index, 1600s-Current.

⁶² Newspapers.com, "Deaths: Gates," *The Peninsula Times Tribune*, November 23, 1966

⁶³ Newspapers.com, "2 Gunmen Clout Woman, Take \$16,000 in gems: Victim Lured to Holdup," *The Peninsula Times Tribune*, December 9, 1960.

⁶⁴ Newspapers.com, Search: "Frankfurt Realty and Investment, Santa Clara County, California."

⁶⁵ Newspapers.com, "2 Gunmen Clout Woman, Take \$16,000 in gems: Victim Lured to Holdup."

⁶⁶ Ancestry.com, "Troy Roy Mansker," U.S., Find a Grave® Index, 1600s-Current.

⁶⁷ Ancestry.com, "Doris Eveyn Mansker," U.S., Find a Grave® Index, 1600s-Current.

⁶⁸ Ancestry.com, "Troy Roy Mansker," U.S., Department of Veterans Affairs BIRLS Death File, 1850-2010.

⁶⁹ Ancestry.com, "Troy R Mansker," Iowa, U.S., Marriage Records, 1880-1948: 1944, 1 (Adair County-Dubuque County).

⁷⁰ Newspapers.com, "Funeral Notices: Mansker," *Santa Cruz Sentinel*, May 28, 1965.

⁷¹ Ancestry.com, "Troy Mansker," 1950 United States Federal Census: Iowa, Bremer County, Waverly, 9-25.



1929 House, ca. 1933 Detached Garage, and Landscape		
Year(s)	Owners/Occupants	Details
		had relocated to Santa Clara County.⁷² Grace died on May 27, 1965.⁷³ Troy died April 28, 2006.⁷⁴
1962-1964	Owners: Edwin H. Feinberg and Emily W. Feinberg	- The subsequent owners of the Property were Edwin H. and Emily W. Feinberg. - Edwin was born on December 20, 1927, in Boston, Massachusetts.⁷⁵ - Edwin enlisted in the Army on annuary 11, 1946; however, he was never called to serve.⁷⁶ In 1962, Edwin graduated from Cornell University after completing his doctoral thesis, "The Evolutionary Adjustment of Two Dipteran Species, <i>Phaenicia</i> (-<i>Lucilia</i>) <i>Sericata</i>, (<i>Calliphoridae</i>) and <i>Musca Domestica</i>, (<i>Muscidae</i>), Competing for the Same Niche in a Laboratory Population Cage."⁷⁷ After graduation, Edwin registered in the American Institute of Biological Sciences, with a Ph.D., Ed.D, Sc.D in Biosciences.⁷⁸ He worked for the Literature Resources Department of BioSciences Information Services of Biological Abstracts.⁷⁹ - Edwin died on April 6, 2008, in Philadelphia.⁸⁰ - No information regarding Emily was found.
1964-1969	Owner: Roberta Ridley	- The subsequent owner of the Property was Roberta Ridley. - Roberta Jane Viborg was born February 10, 1916.⁸¹ - Roberta attended Salinas Junior College and finished at San Jose School of Business.⁸² Roberta married Paul Martin Ridley in February 1936.⁸³ Per the 1940 census, the couple lived in Redwood Township, where

⁷² Newspapers.com, "In Sequoia Hospital Redwood City, July 10, 1951," *The Peninsula Times Tribune*, July 11, 1951.

⁷³ Ancestry.com, "Doris Eveyn Mansker," *U.S., Find a Grave® Index, 1600s-Current*.

⁷⁴ Ancestry.com, "Troy Roy Mansker," *U.S., Find a Grave® Index, 1600s-Current*

⁷⁵ Ancestry.com, "Edward," *Massachusetts, U.S., State and Federal Naturalization Records, 1798-1950: District Court, Massachusetts, Petition No. 290011, Maria Grazia Cintrella-Petition No. 290629, Catherine Macmillan*.

⁷⁶ Ancestry.com, "Edwin H Feinberg," *U.S., World War II Army Enlistment Records, 1938-1946*.

⁷⁷ Edwin Harold Feinberg, "The Evolutionary Adjustment of Two Dipteran Species, *Phaenicia* (-*Lucilia*) *Sericata*, (*Calliphoridae*) and *Musca Domestica*, (*Muscidae*), Competing for the Same Niche in a Laboratory Population Cage," (Cornell University, 1962).

⁷⁸ Ancestry.com, "Edwin H Feinberg," *U.S., National Register of Scientific and Technical Personnel, 1921-1970*.

⁷⁹ Edwin H. Feinberg, "Foreign Journals," *BioScience*, Volume 23, Issue 2, (February 1973, Page 74): <https://doi.org/10.2307/1296565>.

⁸⁰ Legacy.com, "Edwin Feinberg Obituary," accessed February 27, 2025, <https://www.legacy.com/us/obituaries/inquirer/name/edwin-feinberg-obituary?id=10594912>

⁸¹ Ancestry.com, "Roberta J Viborg," *California Birth Index, 1905-1995*.

⁸² Newspapers.com, "Miss Roberta Jane Viborg and Paul Martin Ridley Wed in Methodist Church," *The Californian*, February 6, 1939.

⁸³ Ibid.



1929 House, ca. 1933 Detached Garage, and Landscape

Year(s)	Owners/Occupants	Details
		Roberta worked as a stenographer.⁸⁴ After the couple had children, Albert and Mary, Roberta temporarily retired to remain at home.⁸⁵ • Roberta died on August 3, 1992.⁸⁶
1969-1973	Owners: Joseph A. Palma and Patricia Palma	• The subsequent Property owners were Joseph A. and Patricia Palma. • Joseph Andrew Palma was born February 12, 1939.⁸⁷ Patricia Jayne Wallace was born June 10, 1944.⁸⁸ • The couple were married November 16, 1963.⁸⁹ Joseph played baseball in the minor league between 1960 to 1965.⁹⁰ • No further information regarding the couple was found.
1973-1975	Owners: Charles F. Jerabek and Sydney Jerabek	• The subsequent owners of the Property were Charles and Sydney Jerabek. • Charles was born on July 18, 1945, in Queens, New York.⁹¹ • Charles and Sydney were married September 10, 1966, in New York City.⁹² Together, they had two children, Rodney and Molly.⁹³ • Charles died May 19, 2014.⁹⁴ • No further information regarding Charles and Sydney was found.
1975-1993	Owners: Kenneth Jones and Doris Jones	• The subsequent owners of the Property were Kenneth and Doris Jones. • No information could be confirmed regarding either Kenneth or Doris.

⁸⁴ Ancestry.com, "Roberts J Rudley," 1940 United States Federal Census: California, Santa Clara County, Redwood, 43-47

⁸⁵ Ancestry.com, "Roberta J Ridley," 1950 United States Federal Census: California, Santa Clara County, Redwood, 43-115A.

⁸⁶ Ancestry.com, "Roberta Jane Ridley," California, U.S., Death Index, 1940-1997.

⁸⁷ Ancestry.com, "Joseph Andrew Palma," California Birth Index, 1905-1995.

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⁸⁹ Newspapers.com, "Engagement is Told: Wallace-Palma," The Peninsula Times Tribune, October 14, 1963.

⁹⁰ Baseball Reference, "Joseph Palma," accessed February 27, 2025, <https://www.baseball-reference.com/register/player.fcgi?id=palma-001jos>

⁹¹ Newspapers.com, "Charles F. Jerabek," The Naples Daily News, May 23, 2014.

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⁹⁴ Ibid.



(Photo by Berton Crandall)

5 GENERATIONS CELEBRATE PALO ALTO'S 104TH BIRTHDAY

Mrs. Elizabeth Van Epps, a Palo Alto resident for more than half of her 104 years, poses with her son, Harry Van Epps of Los Altos, her granddaughter, Mrs. George Fanucci (standing) of Mountain View, great-granddaughter Mrs. Robert Bailey, also of Mountain View, and great-great-granddaughter Debbie Bailey. Mrs. Van Epps was born July 29, 1855, in Glenville, N.Y. She remembers President Abraham Lincoln and the pioneering movement across

the Western plains. She and her husband, the late George H. Van Epps, came to Palo Alto 54 years ago. Mr. Van Epps built a home at 627 Channing Ave. For the past 12 years she has been living with her son-in-law and daughter, Mr. and Mrs. Archie Crandall, at 2020 Bryant St. She has two other sons, David of Palo Alto and Howard of Columbus, Mont., six grandchildren, six great-grandchildren and one great-great-grandchild.

Figure 13. 1959 photograph of Harry P. Van Epps, with his mother, daughter, granddaughter and great-granddaughter (courtesy of Newspapers.com).



TO OCCUPY NEW HOME

Mrs. and Mrs. Harry Van Epps of Los Altos will move at the end of this week into the new home which they have just completed on Pepper drive. Since selling their former residence on Hawthorn street they have been occupying temporary quarters on

the new property.

Figure 14. Announcement of the completion of the 1929 house (courtesy of newspapers.com, *The Peninsula Times Tribune*, July 15, 1929).



Figure 15. 1930 aerial, showing the 1929 house within the Property (courtesy of University of Santa Barbara Library).



Figure 16. 1939 aerial, showing the 1929 house and ca. 1933 detached garage within the Property (courtesy of University of Santa Barbara Library).

PERMIT HISTORY (1994 – 2024)

The following section details the Property's available permit history from 1994 to 2024.

Permits Approved			
Date	Permit #	Item (as shown on the permit)	Approved
1994	44466	Re-roof	Yes
1999	635356	"W/H" (water heater)	Yes

Application Submitted			
Date	Permit #	Item (as shown on the permit)	Approved
9/17/2024	No permit issued	"Legalization of existing detached cottage to an ADU"	No



ARCHITECTURAL CONTEXT

The following section briefly describes the Colonial Revival architectural style associated with the 1929 house within the Property.

COLONIAL REVIVAL (1880 – CA. 1955)

The term "Colonial Revival" refers to a rebirth of interest in the early English and Dutch colonial houses of the Atlantic Seaboard. The style was reintroduced in America at the Philadelphia Exposition of 1876, which marked the centennial of the signing of the Declaration of Independence. Many of the buildings designed for the Exposition were based on historically significant colonial designs. At about the same time, several national organizations publicized a series of articles on eighteenth century American architecture, which appeared in the *American Architect* and *Harper's* magazines. The renewed interest in colonial architecture fueled by the centennial and the exposure of the Colonial Revival style received in national publications helped to make it popular throughout the country. According to McAlester, Colonial Revival buildings (aka American Colonial Revival) were extremely popular from the 1910s to the 1930s and unlike other period revival styles, and continued through the early 1960s, although it was utilized less frequently and less elaborately after WWII.⁹⁵

The Colonial Revival style typically includes the following:⁹⁶

- Symmetry in façade – although 10% of Colonial Revival were asymmetrical.
- Hipped or gabled roofs with boxed eaves
- Fanlights and/or sidelights around main door.
- Double-hung sash windows, often set in pairs.
- Clapboard and brick exterior cladding
- Classical detailing (sometimes exaggerated), including pediments, columns or pilasters leading to elaborate entries
- Subtypes include Asymmetrical, Hipped Roof with Full-Width Porch, Hipped Roof without Full-Width Porch, Side Gable Roof, Centered Gable, Gambrel Roof, Second-Story Overhang, One-Story, Three-Story and Built-In Garage.

HISTORIC ARCHITECTURAL SURVEY

On January 13, 2025, EDS Principal Architectural Historian Stacey De Shazo, M.A., completed a historic architectural survey of the Property, including the 1929 house, ca. 1933 detached garage, and landscape. The results of the survey are documented in the following section.

1929 HOUSE

The 1929 house is associated with Colonial Revival architecture (Figure 17). The building is a side-gabled one-

⁹⁵ Virginia, McAlester and Lee McAlester, *A Field Guide to American Houses*. New York, Alfred A. Knopf. Munro-Fraser, J.P. 2014.

⁹⁶ Ibid.



and-one-half-story form that rests on a board-formed concrete and post-and-pier foundation. The house consists of a steep-pitched roof clad in asphalt shingles. A chimney is located along the roof ridge, and it is clad in stucco. The building is clad in wood clapboard on three elevations, with the rear elevation (north elevation) consisting of no cladding due to a permit in process.



Figure 17. South elevation, facing north.

South Elevation (Primary Façade)

The south elevation is the primary façade is symmetrical (Figure 18). At the first story, there is a centered, wooden front door flanked by side lights, each with four lights with simple mutins and a lower wood panel. The door is a replacement wood-paneled door with two window lights. The front door is accessed via a paved driveway, with the entrance threshold resting at the ground level. Although the primary façade is on a raised foundation, it is not visible as the clapboard has been extended to the ground. There is a modern, arched arbor in front of the door, which serves as a “covered porch,” which is not original to the house. The front door is flanked by two pairs of six-over-one, divided light, wood windows with lugs (Figure 19). There are decorative wood shutters that flank the windows. The roof consists of three original, front-gable dormers with six-over-six, divided light, wood windows with lugs. The windows are trimmed in wood casing, with a slightly projecting windowsill. The dormers are clad in wood clapboard and the dormer roofs are clad in asphalt shingles (Figure 20). Below the eave of the roof there is a simple dentil that runs the length of the primary façade.



Figure 18. Primary façade, facing north.



Figure 19. Photograph showing a pair of windows along the primary façade.



Figure 20. Photograph showing the three roof dormers.

West Elevation

The west elevation consists of five windows (Figure 21). There are two, six-over-one, divided light, wood windows with lugs, and one smaller three-over-one, divided light, wood window located on the first story. Within the one-half-story gable there is one six-over-six light, wood window with lugs and a small, fixed wood window that appears to have been recently added. The windows are trimmed in wood casing, with a slightly projecting windowsill. There is also a gable vent that appears to be constructed of wood (Figure 22). The board-formed concrete foundation is only slightly exposed along this elevation.



Figure 21. West elevation, facing north.



Figure 22. West elevation gable.



North Elevation

The current north elevation shows what remains of the rear shed addition (likely added to the house in ca. 1933), removed in 2024 (Figure 23 and Figure 24), was likely a sun porch or utility room. The shed addition consisted of a pair of windows on the north elevation, and a door. What remains is the section of an east facing wall (detailed within the east elevation section below). The original north elevation wall from the construction of the 1929 house consisted of a pair of windows, a single window, and two doors, one leading to the basement and another leading into the house; removed in 2024.⁹⁷



Figure 23. North elevation, facing east.

⁹⁷ Based on information provided by the City of Los Altos, this works was unpermitted.



Figure 24. North elevation, facing south.

East Elevation

The east elevation consists of the section of a wall, which was part of a small shed addition, no longer extant, except for the wall that is visible in Figure 24 and Figure 25, as well as the original side gable form. The shed addition appears to have been clad in a combination of wood and aluminum clapboard and measured approximately 15 feet long by 6 feet wide. The walls that remain consisted of a pair of four-over and one single-hung, wood-clad vinyl windows. The original one-and-one-half-story portion of the east elevation consists of a pair of six-over-one, divided light, wood windows with lugs, and a smaller six-over-six, divided light, wood window (Figure 26). There is also a twelve-divided-light wood window near the southeast corner of the house, which appears to have been added later. The board-formed concrete foundation is exposed along this elevation (Figure 27).



Figure 25. Photograph showing a portion of an addition, no longer extant.



Figure 26. The east façade, facing south.



Figure 27. Photograph showing the board-formed concrete foundation is exposed along this elevation.

CA. 1933 DETACHED GARAGE

The ca. 1933 detached garage is not associated with any architectural style. The ca. 1933 detached garage is a simple side gable form with moderate pitched roof with “faux” gable returns on each gable end. The building is clad in wide wood boards and the roof is clad in asphalt shingles. There are what appear to be original wood and glazed hinged doors along the southern elevation (Figure 28); however, the doors are decorative, as the opening has been filled in – allowing for the use as a cottage. In 1994, the building was converted to a “cottage”; however, it may have been used for housing prior to 1994. Fenestrations include one six-light, wood, fixed window, a pair of six-light, wood, hopper windows, two single, six-light, hopper windows, one double-hung, wood window with lugs, one four-over-four-light, single-hung, wood-clad vinyl window, and a modern single entrance door (Figure 29). The building appears to rest on a concrete slab foundation. A modern deck extends the length of the north elevation.



Figure 28. South elevation, facing north.



Figure 29. Photograph showing the north and east elevations, facing southwest.



LANDSCAPE

The landscape consists of shrubs and trees, including pine and oak trees (Figure 30 and Figure 31). Approximately 75% of the front yard is covered in hardscape, including pavers and a concrete and brick driveway, and concrete block planter beds. There is wooden fencing along the north, west, and east perimeter of the Property, and wood and metal privacy fencing in the backyard along the southwest corner of the ca. 1933 detached garage.



Figure 30. Frontyard, facing northeast.



Figure 31. Backyard, facing northeast.

EVALUATION OF HISTORICAL SIGNIFICANCE

The Property, including the 1929 house, ca. 1933 detached garage, and landscape was evaluated to determine individual eligibility for listing on the CRHR. The 1929 house was evaluated for its association with Colonial Revival architecture with a period of significance of 1929, the year the house was constructed. The ca. 1933 detached garage, and landscape are not associated with any style architectural landscape design or landscape planning.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The CRHR is an inventory of significant architectural, archaeological, and historical resources in California. Resources can be listed in the CRHR through several methods. State Historical Landmarks and NRHP listed properties are automatically listed in the CRHR. Properties can also be nominated to the CRHR by local governments, private organizations, or citizens. The CRHR follows *similar* guidelines to those used for the NRHP.⁹⁸ One difference is that the CRHR identifies the Criteria for Evaluation numerically instead of alphabetically. Another difference, according to the OHP is that “It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register. A resource that has lost its historical character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data”.⁹⁹

⁹⁸ California Code of Regulations, Title 14, Chapter 11.5, Section 4850 et seq.

⁹⁹ California Office of Historic Preservation Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register).



A property must possess significance under one of the four criteria and have historic integrity to qualify for listing in the CRHR. Determining integrity consists of evaluating seven variables or aspects that include location, design, setting, materials, workmanship, feeling, and association. According to the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, these seven characteristics are defined as follows:

- **Location** is the place where the historic property was constructed.
- **Design** is the combination of elements that create the form, plans, space, structure, and style of the property.
- **Setting** addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s).
- **Materials** refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.
- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history.
- **Feeling** is the property's expression of the aesthetic or historic sense of a particular period of time.
- **Association** is the direct link between an important historical event or person and a historic property.

The following section examines the CRHR eligibility of the Property containing the 1929 house, ca. 1933 detached garage, and landscape.

CRHR EVALUATION

1. **(Event): Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.**

The Property, including the 1929 house, ca. 1933 detached garage, and landscape, was not found to be associated with any event that made a significant contribution to California's history and cultural heritage.

Therefore, the Property, including the 1929 house, ca. 1933 detached garage, and landscape, is not individually eligible for listing in the CRHR under Criterion 1.

2. **(Person): Is associated with the lives of persons important in our past.**

A thorough literature search and review of the Property owners and occupants was completed; however, the research did not reveal any person associated with the Property that is important to our past who is eligible for listing on the CRHR.

Therefore, the Property does not appear individually eligible for listing in the CRHR under Criterion 2.

3. **(Construction/Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.**



Architecture: The 1929 house is associated with Colonial Revival architecture, with a period of significance of 1929. The 1929 house consists of elements of the Colonial Revival design, including the side-gabled one-and-one-half-story form, wood clapboard siding, divided light wood windows, and symmetrical primary façade. Although the building is constructed in the Colonial Revival style, it does not embody the distinctive characteristics of Colonial Revival architecture and is not representative of the design. In addition, it does not embody a method of construction and does not represent the work of an important creative individual or possess high artistic values.

The ca. 1933 detached garage, and landscape are not associated with any style architectural landscape design or landscape planning.

Therefore, the 1929 house, ca. 1933 detached garage, and landscape within the Property do not appear to be individually eligible for listing in the CRHR under Criterion 3.

4. (Information potential): Has yielded, or may be likely to yield, information important in prehistory or history.

Criterion 4 most commonly applies to resources that contain or are likely to contain information on an important archaeological research question. While most often applied to archaeological sites, Criterion 4 can also apply to built environment resources that contain important information. For a building to be eligible under Criterion 4, it must be a principal source of important information, such as exhibiting a local variation on a standard design or construction technique can be eligible if a study can yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

The 1929 house does not appear to be able to convey important information about Colonial Revival architecture. As such, the 1929 house, ca. 1933 detached garage, and landscape within the Property are not eligible for listing in the CRHR under Criterion 4. The Property was not assessed for archaeology.

LOCAL ASSESSMENT AND RECOMMENDATION

Because local inventories, including the 2011 documentation of the 1929 house, often do not meet the documentation and evaluation requirements needed to assess impacts to historical resources under CEQA,¹⁰⁰ it is important to ensure that the documentation and evaluation of a historic property is complete following OHP and CEQA guidelines.¹⁰¹ Although the 1929 house is currently a locally listed historical resource, the City has requested an “updated” local assessment of all the built environment within the Property following the current Los Altos Municipal Code Section 12.44.040 to advise the city on continued local listing of the 1929 house, or listing of the ca. 1933 or landscape within the Property. Please note that the integrity analysis is

¹⁰⁰ Office of Historic Preservation, “Historic Resource Surveys,” (accessed 4/18/2025), https://ohp.parks.ca.gov/?page_id=23317.

¹⁰¹ The OHP suggests that although “an existing survey over five years old can provide valuable information, it is appropriate to update the survey to ensure that local planning and preservation decisions are based on the most current information available.”



part of the city's ordinance; and though similar in wording is different than what is required as part of the NPS and OHP guidelines that require a building, structure, site, object, or district to first have significance prior to completing an integrity analysis.

ASSESSMENT

12.44.040 - Criteria for Designation.

A structure, property or object may be eligible for designation as a historic (sic)¹⁰² resource or historic landmark, if it/they satisfy each of the three criteria listed below:

- A. Age. A structure or property should be more than fifty (50) years in age.¹⁰³ (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).

EDS Assessment: The Property, including the 1929 house and ca. 1933 detached garage, is over 50 years old. As such, the Property including the 1929 house and ca. 1933 detached garage retain integrity of Age.

- B. Determination of Integrity.¹⁰⁴ A structure (sic)¹⁰⁵ or property should retain sufficient historic integrity in most of the following areas:

- 1) Design: The combination of elements that create the form, plan, space, structure and style of a property.

EDS Assessment: The original side-gable form of the house from 1929 remains intact, and modest elements of Colonial Revival design are present including the wood clapboard siding, divided light wood windows, and symmetrical primary façade. However, having these design elements alone is not enough to consider a building to be representative of Colonial Revival architecture. The 1929 house lacks distinctive features including a prominent front entrance, including columns or pilasters, is a paired down version of the style, and lacks quality of design throughout to represent this style. As such, EDS recommends that the 1929 house lacks the integrity to convey significance for its association with Colonial Revival architecture.

The ca. 1933 detached garage is not associated with any architectural style or form.

- 2) Setting: The physical environment of a historic property.

EDS Assessment: The setting has changed since the construction of the 1929 house, but the setting remains a small neighborhood with modest-sized houses set back from the street and designed in

¹⁰² Historical resource.

¹⁰³ Just for reference, the NPS guidelines is at least 50 years old, and not more than 50 years in age.

¹⁰⁴ Integrity is an assessment tool devised by the NPS and utilized by the OHP to assess a historical resources ability to convey significance. An integrity analysis is only completed if a building, structure, object, site, or district is found to be significant. Although EDS did not find any of the buildings within the Property significant, the 1929 house is currently locally listed. As such, EDS utilized the City's "integrity" analysis to assess integrity for continued local listing.

¹⁰⁵ See the definition on page 5 detailing the OHP guidelines (take from the NPS) for the five classes of cultural resources.



various styles.

As such, the Property including the 1929 house and ca. 1933 detached garage retain integrity of setting.

- 3) Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

EDS Assessment: The 1929 house retains the original wood clapboard siding on three of the four elevations; ten divided light wood windows; two paired, divided light windows; and wood shutters on the primary façade appear to be original from 1929. Although the intent of 'integrity of material' is to support or not support significance findings – in this case EDS did not find the 1929 house to be eligible under any significance criterion, the 1929 house does retain materiality from 1929.

EDS Assessment: The ca. 1933 garage has been significantly modified in materials; however, the exterior cladding and several windows may be original. As such, it retains a reduced amount of integrity of materials from ca. 1933.

- 4) Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

Workmanship is "the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques. Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery."¹⁰⁶

EDS Assessment: The workmanship evident on the 1929 house is very modest, as the house is a simple variation of the Colonial Revival style adapted to meet the lot size and the owner's budget. Though the wood windows with lugs show workmanship, these windows were not produced on-site, instead these windows were in mass production by this time, and most were purchased via millwork companies or lumber yards. In addition, the clapboard, shutters, and dentil were also likely purchased at a lumberyard or mill (unknown if the work is local or from nearby companies, which produced these standardized window and frame units). Furthermore, the workmanship evident on the house does not show any special skill in Colonial Revival design, as it does not include the Classical detailing (sometimes exaggerated), including pediments, columns or pilasters leading to elaborate entries, which is where workmanship is often showcased through hand-tooling, carving, painting, or joinery. Therefore, the integrity of workmanship in association with

¹⁰⁶ National Park Service, "How to Apply the National Register Criteria for Evaluation," 1990 (Revised 1995).



Colonial Revival design is not present. In addition, although there is some degree of skill required to construct a house, this is not the intent of the term “workmanship” to mean basic construction techniques, which are present within the 1929 house—though modest at best. As such, EDS recommends that the 1929 house does not meet the requirement for integrity of materials.

- 5) Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

EDS Assessment: Physical features, taken together, convey a property's historic character. However, 1929 is a modest example of Colonial Revival Architecture, which was popular in the U.S. from 1880 to ca. 1955. This house was not intended to meet the grander expectations of a Colonial Revival house—instead, the owner likely chose elements that they liked for the modest house. As such, the building fails to evoke the architectural details and spirit of the style. As such, EDS recommends that the 1929 house does not meet the requirement for integrity of feelings.

Although the significance finding should come before an integrity analysis for the following section, EDS completed this documentation in accordance with 12.44.040 and the order as laid out within the ordinance. This section was completed as an update to determine continued eligibility for local listing.

- C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:¹⁰⁷

- 1) Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;¹⁰⁸

EDS Assessment: None of the current built environment resources within the Property are not currently listed on the NRHP, the CRHR, or locally for association with an event. The EDS HRE determined that the Property is not eligible for listing on the CRHR for association with any event. In addition, the Property was not found to be associated with any event that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the U.S. for local listing. As such, the Property, including the 1929 house, ca. 1933 detached garage, and landscape are not eligible for local listing under this criterion.

- 2) Person/People: Associated with the lives of persons important to the local, California or national history;

EDS Assessment: A thorough literature search and review of the Property owners and occupants was completed; however, the research did not reveal any person associated with the Property that is important to our past who is eligible for local listing under this criterion.

- 3) Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or

¹⁰⁷ https://ohp.parks.ca.gov/?page_id=21238

¹⁰⁸ NRHP Criterion: Is associated with events that have made a significant contribution to the broad patterns of our history (Criterion A); .



EDS Assessment: The 1929 house is associated with Colonial Revival architecture, with a period of significance of 1929. The 1929 house consists of modest elements of the Colonial Revival design, including the side-gable form, wood clapboard siding, divided light wood windows, and symmetrical primary façade. Although the building is constructed in the Colonial Revival style, it does not embody the distinctive characteristics of Colonial Revival architecture and is not representative of the design. In addition, it does not embody a method of construction and does not represent the work of a master or possess high artistic values. Therefore, the 1929 house does not appear eligible for continued listing on the local HRI.

The ca. 1933 detached garage, and landscape are not associated with any style architectural landscape design or landscape planning.

- 4) Archaeology: Yields important information about prehistory or history of the local area, California or the nation.

EDS Assessment: The Property was not assessed for archaeology.

RECOMMENDATIONS

Based on the findings in the HRE and local assessment, EDS recommends that the 1929 house within the Property is removed from the City of Los Altos HRI as it does not appear to meet the criteria of Section 12.44.040 due to loss of integrity and/or historic significance. In addition, the ca. 1933 detached garage and landscape are not eligible for local listing under any significance criterion.

CONCLUSION

In accordance with CEQA regulations and guidelines, EDS completed an HRE of the 0.23-acre property at 81 Pepper Drive, Los Altos, Santa Clara County, California including the 1929 house, ca. 1933 detached garage, and landscape. The HRE was completed to determine if any of the built environment resources within the Property are eligible for listing on the CRHR. The HRE was completed by EDS Principal Architectural Historian Stacey De Shazo, M.A., and Architectural Historian Nicole Wyton, M.S., who exceed the Secretary of the Interior's qualification standards in Architectural History and History, and Researcher Bee Thao, M.A. The HRE determined that the Property containing the 1929 house, ca. 1933 detached garage, and landscape does not appear individually eligible for listing on the CRHR under any criteria. However, the 1929 house is listed on the local Los Altos HRI.¹⁰⁹ As such, the 1929 house is considered a Historical Resource as defined in Section 15064.5 of the CEQA Guidelines. However, based on the updated local assessment, EDS recommends that it be removed (delisted) from the HRI. If removed, the 1929 house would not be a historical resource under CEQA.

¹⁰⁹ The 1929 house was not assigned a "California Register Historic Status Code."



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1939 Aerial

1965 Aerial



Appendix A:

DPR Forms

State of California The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code

Other Listings
Review Code

Reviewer

Date

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*Resource Name or #: 81 Pepper Drive

P1. Other Identifier: _____

*P2. Location: ☐ Not for Publication ☒ Unrestricted

*a. County Santa Clara County and

*b. USGS 7.5' Quad Mountain View Date 1991 T 6S; R 2W; ☐ of ☐ of Sec un; MD B.M.

c. Address 81 Pepper Drive City Los Altos Zip 94022

d. UTM: Zone 10N, 578583 mE/ 4137124 mN

e. Other Locational Data: The resource is within the 0.23-acre Assessor Parcel Number (APN) 107-41-007. The Property is located on the north side of Pepper Drive, approximately 474 feet east of San Antonio Road.

*P3a. Description: The resource includes the 1929 house, ca. 1933 detached garage, and landscape. The 1929 house is associated with Colonial Revival architecture. The 1929 house is associated with Colonial Revival architecture. The building is a side-gabled, one-and-one-half-story form that rests on a board-formed concrete and post and pier foundation. The house consists of a steep-pitched roof clad in asphalt shingles. (Continued on Continuation Sheet, Page 2)

P5a.



*P3b. Resource Attributes: HP2.
Single family property (1929 house);
HP4. Ancillary building (ca. 1933
detached garage)

*P4. Resources Present: ☒ Building
☐ Structure ☐ Object ☐ Site ☐ District
☐ Element of District ☐ Other

P5b. Description of Photo: 1929
house, facing north

*P6. Date Constructed/Age and
Source: ☒ Historic ☐ Prehistoric
☐ Both 1929 house and ca. 1933
detached garage; various sources

*P7. Owner and Address: Withheld
by owners

*P8. Recorded by: Stacey De Shazo,
M.A., Evans & De Shazo, Inc. 1141
Gravenstein Highway S, Sebastopol,
California 95472

*P9. Date Recorded: 1/13/2025

*P10. Survey Type: Intensive

*P11. Report Citation: Stacey De Shazo and Nicole Wyton, with Bee Thao (2025): A Historic Resource Evaluation of the Property
at 81 Pepper Drive, Los Altos, Santa Clara County, California.

*Attachments: ☐ NONE ☒ Location Map ☒ Continuation Sheet ☐ Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other (List): _____

CONTINUATION SHEET

Property Name: 81 Pepper Drive

Page 2 of 15

(Continued from Primary, page 1)

1929 House

The 1929 house is associated with Colonial Revival architecture (Figure 1). The building is a side-gabled one-and-one-half-story form that rests on a board-formed concrete and post-and-pier foundation. The house consists of a steep-pitched roof clad in asphalt shingles. A chimney is located along the roof ridge, and it is clad in stucco. The building is clad in wood clapboard on three elevations, with the rear elevation (north elevation) consisting of no cladding due to a permit in process.



Figure 1. South elevation, facing north.

South Elevation (Primary Facade)

The south elevation is the primary façade is symmetrical (Figure 2). At the first story, there is a centered, wooden front door flanked by side lights, each with four lights with simple mutins and a lower wood panel. The door is a replacement wood-paneled door with two window lights. The front door is accessed via a paved driveway, with the entrance threshold resting at the ground level. Although the primary façade is on a raised foundation, it is not visible as the clapboard has been extended to the ground. There is a modern, arched arbor in front of the door, which serves as a “covered porch,” which is not original to the house. The front door is flanked by two pairs of six-over-one, divided light, wood windows with lugs (Figure 3). There are decorative wood shutters that flank the windows. The roof consists of three original, front-gable dormers with six-over-six, divided light, wood windows with lugs. The windows are trimmed in wood casing, with a slightly projecting windowsill. The dormers are clad in wood clapboard and the dormer roofs are clad in asphalt shingles (Figure 4). Below the eave of the roof there is a simple dentil that runs the length of the

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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primary façade.



Figure 2. Primary façade, facing north.



Figure 3. Photograph showing a pair of windows along the primary façade.

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Property Name: 81 Pepper Drive

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Figure 4. Photograph showing the three roof dormers.

West Elevation

The west elevation consists of five windows (Figure 5). There are two, six-over-one, divided light, wood windows with lugs, and one smaller three-over-one, divided light, wood window located on the first story. Within the one-half-story gable there is one six-over-six light, wood window with lugs and a small, fixed wood window that appears to have been recently added. The windows are trimmed in wood casing, with a slightly projecting windowsill. There is also a gable vent that appears to be constructed of wood (Figure 6). The board-formed concrete foundation is only slightly exposed along this elevation.

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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Figure 5. West elevation, facing north.

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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Figure 6. West elevation gable.

North Elevation

The current north elevation shows what remains of the rear shed addition (likely added to the house in ca. 1933), removed in 2024 (Figure 7 and Figure 8), was likely a sun porch or utility room. The shed addition consisted of a pair of windows on the north elevation, and a door. What remains is the section of an east facing wall (detailed within the east elevation section below). The original north elevation wall from the construction of the 1929 house consisted of a pair of windows, a single window, and two doors, one leading to the basement and another leading into the house; removed in 2024.¹

¹ Based on information provided by the City of Los Altos, this works was unpermitted.

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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Figure 7. North elevation, facing east.



Figure 8. North elevation, facing south.

East Elevation

The east elevation consists of the section of a wall, which was part of a small shed addition, no longer extant, except for the wall that is visible in Figure 8 and Figure 9, as well as the original side gable form. The

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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shed addition appears to have been clad in a combination of wood and aluminum clapboard and measured approximately 15 feet long by 6 feet wide. The walls that remain consisted of a pair of four-over and one single-hung, wood-clad vinyl windows. The original one-and-one-half-story portion of the east elevation consists of a pair of six-over-one, divided light, wood windows with lugs, and a smaller six-over-six, divided light, wood window (Figure 10). There is also a twelve-divided-light wood window near the southeast corner of the house, which appears to have been added later. The board-formed concrete foundation is exposed along this elevation (Figure 11).



Figure 9. Photograph showing a portion of an addition that was retained as part of a current project.

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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Figure 10. The east façade, facing south.



Figure 11. Photograph showing the board-formed concrete foundation is exposed along this elevation.

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ca. 1933 Detached Garage

The ca. 1933 detached garage is not associated with any architectural style. The ca. 1933 detached garage is a simple side gable form with moderate pitched roof with “faux” gable returns on each gable end. The building is clad in wide wood boards and the roof is clad in asphalt shingles. There are what appear to be original wood and glazed hinged doors along the southern elevation (Figure 12); however, the doors are decorative, as the opening has been filled in – allowing for the use as a cottage. In 1994, the building was converted to a “cottage”; however, it may have been used for housing prior to 1994. Fenestrations include one six-light, wood, fixed window, a pair of six-light, wood, hopper windows, two single, six-light, hopper windows, one double-hung, wood window with lugs, one four-over-four-light, single-hung, wood-clad vinyl window, and a modern single entrance door (Figure 13). The building appears to rest on a concrete slab foundation. A modern deck extends the length of the north elevation.



Figure 12. South elevation, facing north.

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Property Name: 81 Pepper Drive

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Figure 13. Photograph showing the north and east elevations, facing southwest.

Landscape

The landscape consists of shrubs and trees, including pine and oak trees (Figure 14 and Figure 15). Approximately 75% of the front yard is covered in hardscape, including pavers and a concrete and brick driveway, and concrete block planter beds. There is wooden fencing along the north, west, and east perimeter of the property, and wood and metal privacy fencing in the backyard along the southwest corner of the ca. 1933 detached garage.

CONTINUATION SHEET

Property Name: 81 Pepper Drive

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Figure 14. Frontyard, facing northeast.

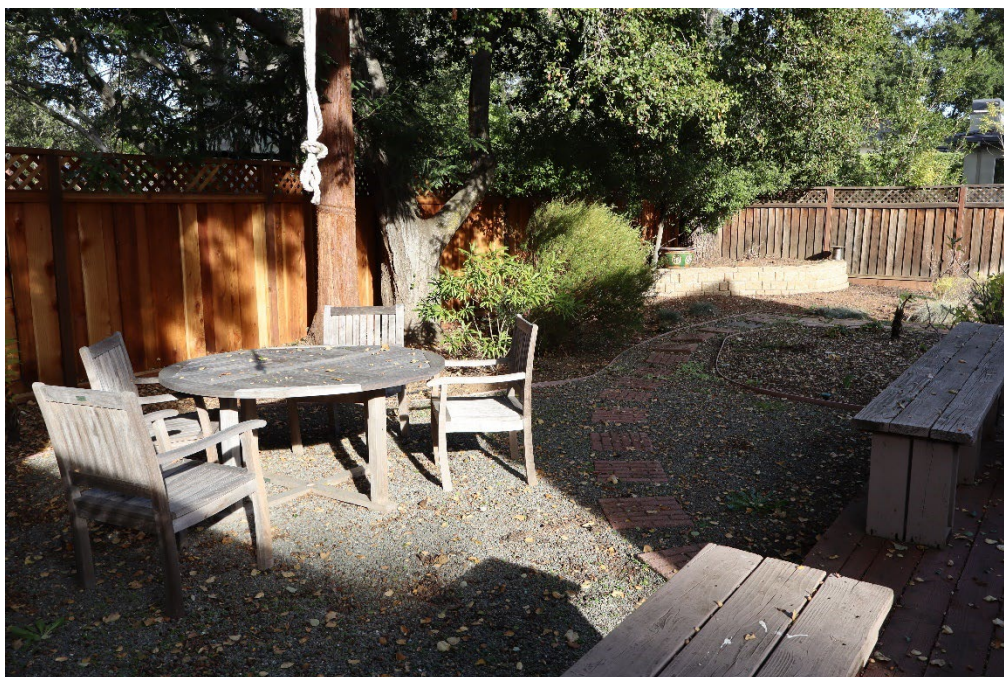


Figure 15. Backyard, facing northeast.

California Register of Historical Resources (CRHR) Evaluation

1. (Event): Is associated with events that have made a significant contribution to the broad

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Property Name: 81 Pepper Drive

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patterns of California's history and cultural heritage.

The property, including the 1929 house, ca. 1933 detached garage, and landscape, was not found to be associated with any event that made a significant contribution to California's history and cultural heritage.

Therefore, the property, including the 1929 house, ca. 1933 detached garage, and landscape, is not individually eligible for listing in the CRHR under Criterion 1.

2. (Person): Is associated with the lives of persons important in our past.

A thorough literature search and review of the property owners and occupants was completed; however, the research did not reveal any person associated with the Property that is important to our past who is eligible for listing on the CRHR.

Therefore, the property does not appear individually eligible for listing in the CRHR under Criterion 2.

3. (Construction/Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Architecture: The 1929 house is associated with Colonial Revival architecture, with a period of significance of 1929. The 1929 house consists of elements of the Colonial Revival design, including the side-gabled one-and-one-half-story form, wood clapboard siding, divided light wood windows, and symmetrical primary façade. Although the building is constructed in the Colonial Revival style, it does not embody the distinctive characteristics of Colonial Revival architecture and is not representative of the design. In addition, it does not embody a method of construction and does not represent the work of an important creative individual or possess high artistic values.

The ca. 1933 detached garage, and landscape are not associated with any style architectural landscape design or landscape planning.

Therefore, the 1929 house, ca. 1933 detached garage, and landscape within the Property do not appear to be individually eligible for listing in the CRHR under Criterion 3.

4. (Information potential): Has yielded, or may be likely to yield, information important in prehistory or history.

Criterion 4 most commonly applies to resources that contain or are likely to contain information on an important archaeological research question. While most often applied to archaeological sites, Criterion 4 can also apply to built environment resources that contain important information. For a building to be eligible under Criterion 4, it must be a principal source of important information, such as exhibiting a local variation on a standard design or construction

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technique can be eligible if a study can yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

The 1929 house does not appear to be able to convey important information about Colonial Revival architecture. As such, the 1929 house, ca. 1933 detached garage, and landscape within the property are not eligible for listing in the CRHR under Criterion 4.

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*Resource Name or # 81 Pepper Drive

*Map Name: Mountain View

*Scale: 1:24,000

*Date of map: 1991

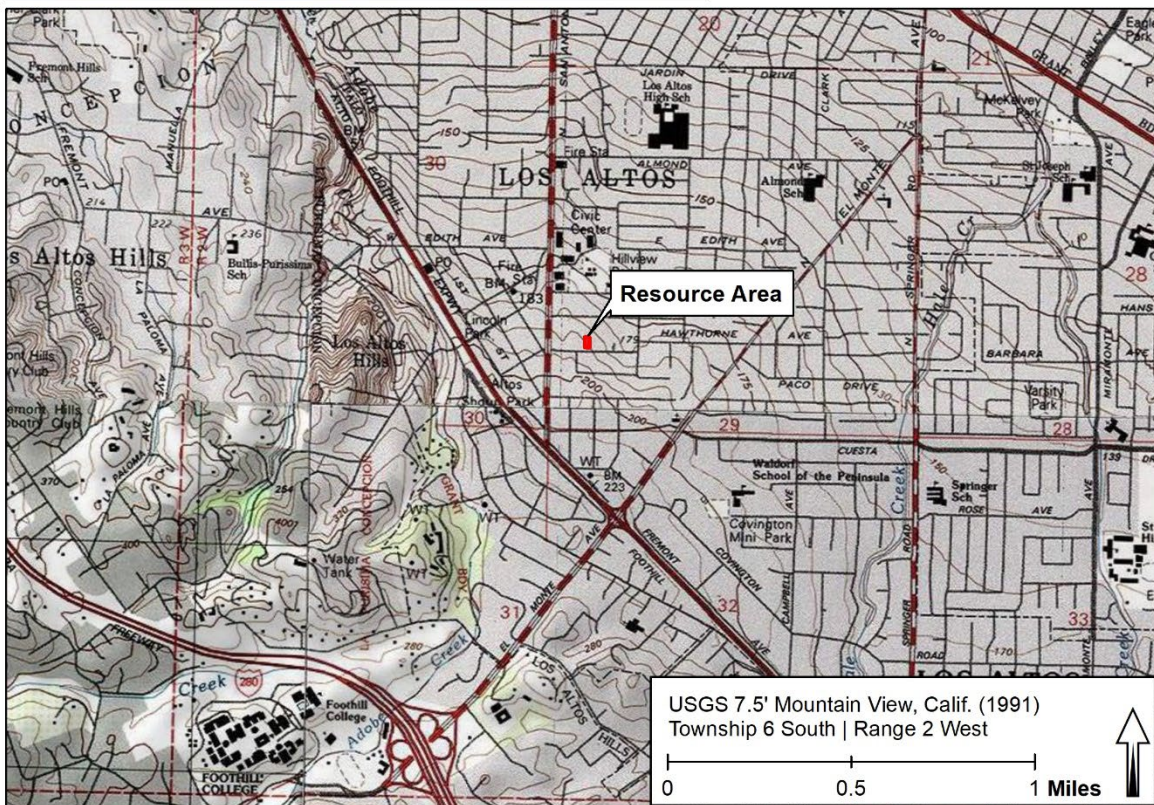


Resource Location Map

ca. 1933 House, ca. 1933 Detached
Garage, and Landscape
81 Pepper Drive, Los Altos
Santa Clara County, California
APN 170-41-007

Legend

Resource Area



MEMORANDUM

DATE	June 16, 2025	PROJECT NO.	25162
TO	Brittany Whitehill, AICP Senior Planner	PROJECT	City of Los Altos
OF	City of Los Altos	FROM	Jen Hembree, Cultural Resource Planner, Page & Turnbull; and Stacy Kozakavich, Project Manager, Page & Turnbull
CC	Christina Dikas Brobst, Principal, Page & Turnbull	VIA	Email

REGARDING 81 Pepper Drive HRE: Peer Review

INTRODUCTION

Page & Turnbull prepared this memorandum at the request of the City of Los Altos (City) regarding the property located at 81 Pepper Drive (APN 170-41-007) in Los Altos. The property is not currently listed in the most recent version available of the State of California Office of Historic Preservation (OHP) Built Environment Resources Directory (BERD) for Santa Clara County, issued in September 2022. It is not listed in the California Register of Historical Resources (California Register), or in the National Register of Historic Places (National Register). The property was found eligible for listing at the local level in 2011 as part of the Los Altos Historic Resources Inventory Update and was subsequently designated as a Historic Resource in the Los Altos Historic Resources Inventory (HRI). A Standards Compliance Review prepared in 2024 by Treanor identified character-defining features of the residence, but did not reevaluate the property's significance. In April 2025, historic preservation consultant Evans & De Shazo, Inc. evaluated the potential historic significance of 81 Pepper Drive and prepared a 2025 Historic Resource Evaluation (2025 HRE) along with State of California Department of Parks & Recreation (DPR) 523A (Primary Record) forms for the property (hereafter referred to as the 2025 DPR 523 Forms), which were appended to the 2025 HRE and include the same information as the 2025 HRE. The 2025 HRE evaluation found that the property was ineligible for listing at the state or local level and recommended its removal from the HRI. Page & Turnbull peer reviewed the 2025 HRE and prior materials to provide our professional opinion on the adequacy of the physical description, background research, historic context, and appropriateness of the finding. Additional information and Page & Turnbull's professional opinion regarding eligibility is also provided.

Imagining change in historic environments through
design, research, and technology

81 Pepper Drive is located just east of downtown Los Altos, on the north side of Pepper Drive between South San Antonio Road to the west and Eleanor Avenue to the east within the North Los Altos neighborhood (**Figure 1 through Figure 3**). The approximately 0.23-acre parcel includes a house built in 1929 and a ca. 1929 detached garage which has been renovated for use as a cottage.¹

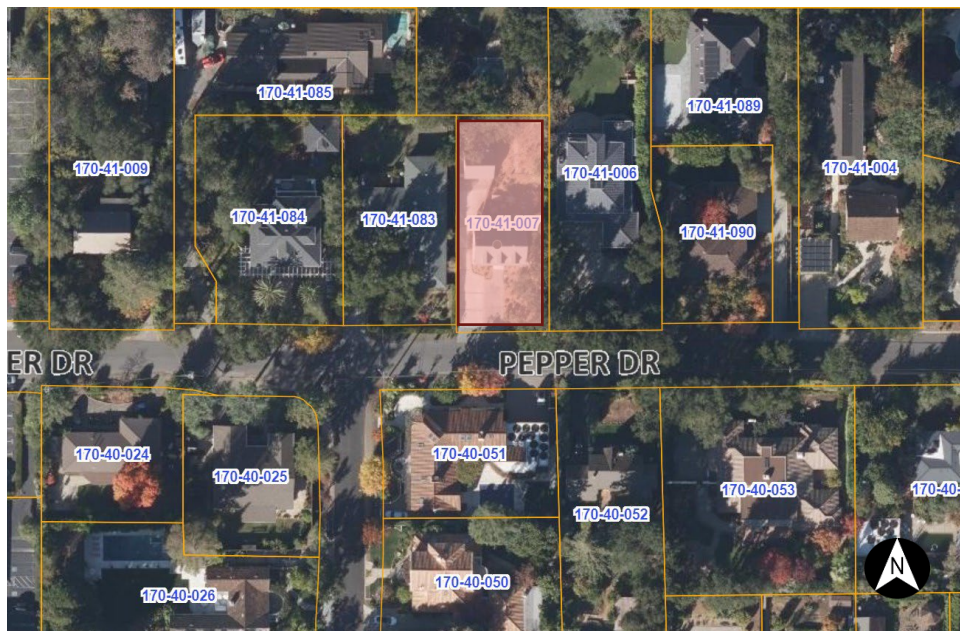


Figure 1. Aerial view of subject property, 2025. Parcel indicated in pink.
Source: County of Santa Clara

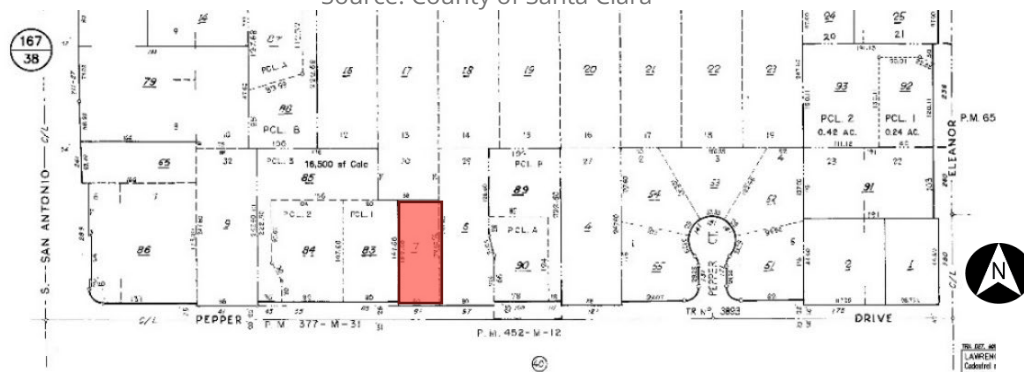


Figure 2.: 81 Pepper Drive Assessor's Map dated 2024-2025. Parcel boundary indicated in red.
Source: County of Santa Clara, edited by Page & Turnbull.

¹ Dates of construction are based on Page & Turnbull research, which indicates that it appears to be more accurate to state the house dates to 1929 and the detached garage/cottage dates to ca. 1929.

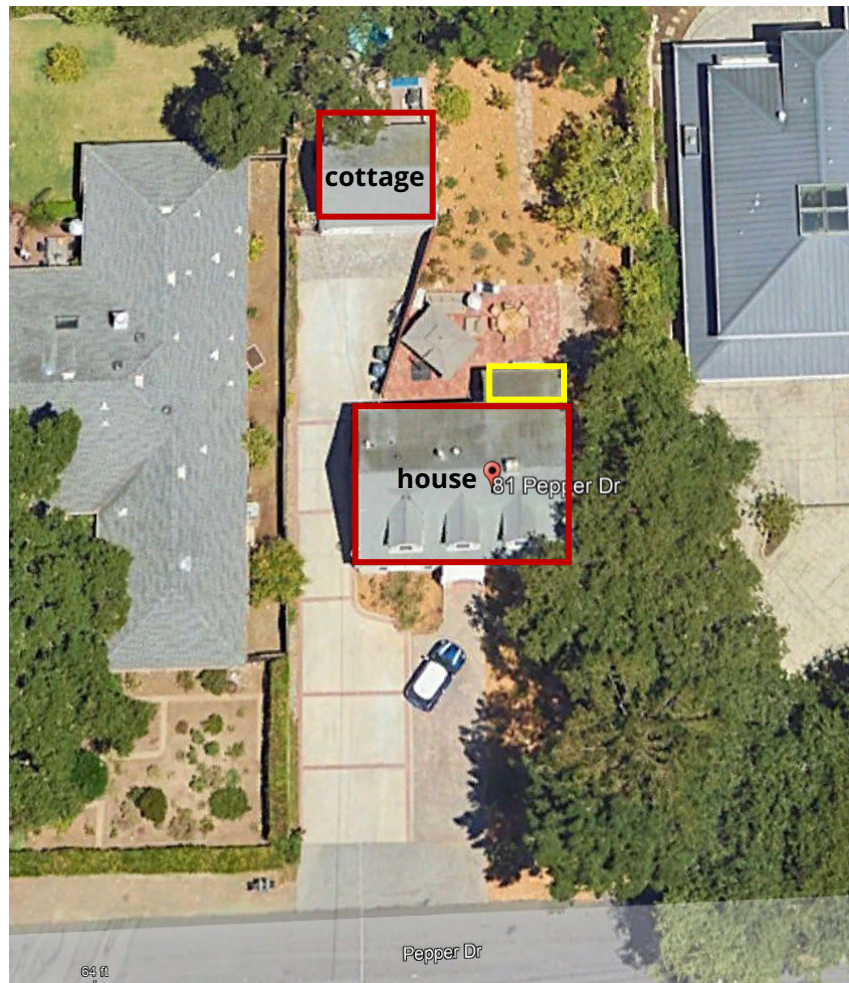


Figure 3. Site plan of 81 Pepper Drive, current footprint of house and cottage shaded red. Outline of shed addition (since mostly removed) in yellow. Source: GoogleEarth, 2022, edited by Page & Turnbull. 2022 imagery used due to clarity.

METHODOLOGY

Page & Turnbull reviewed the following documents in preparation of this memorandum:

- Circa: Historic Property Development, *State of California Department of Parks & Recreation (DPR) 523A and 523B forms*, dated June 8, 2011.
- Treanor, *81 Pepper Drive, Los Altos, CA Standards Compliance Review*, dated September 20, 2024.
- Evans & De Shazo, Inc., *A Historic Resource Evaluation and Updated Local Assessment of the Property Located at 81 Pepper Drive, Los Altos, Santa Clara County, California*, (Updated April 21, 2025) (**Attachment A**)

- DPR 523A Form for 81 Pepper Drive, Los Altos, Evans & De Shazo, Inc., recorded January 13, 2021 and attached as an appendix to the 2025 HRE. **(Attachment A)**

Page & Turnbull conducted a site visit of the subject property on May 19, 2025 to take photographs and observe existing conditions. As per the executed contract with the City of Los Altos dated May 13, 2025, where additional research or analysis needs were identified, as outlined in the Peer Review sections that follow, Page & Turnbull conducted supplemental research and has provided additional information. Research regarding the subject property was conducted using online databases including Newspapers.com, the UC Santa Barbara Library FrameFinder historic aerial photograph website, HistoricAerials.com, San Francisco Public Library's Fire Insurance Maps Online (FIMo) website and Ancestry.com. Site photographs in this report were taken by Page & Turnbull on May 19, 2025 unless otherwise noted.

BRIEF PROPERTY DESCRIPTION

The property at 81 Pepper Drive is a one-and-a-half story, Colonial Revival style residence, more commonly referred to as a 'Cape Cod cottage.' It has a side gable roof featuring three gabled dormers containing multi-light wood windows on the front facade along with a dentiled cornice and eave returns at its side gables. The roof is clad with contemporary composition shingles while the exterior walls are clad in wood clapboard siding. The front façade contains symmetrically balanced fenestration consisting of double-hung, multi-light wood windows with false shutters, paired at first floor and flanking a centered front door. The front door is paneled with sidelights, all of which are framed by simple wood trim and sheltered by a contemporary arbor/trellis. A stucco-clad chimney with brick coping pierces the eastern portion of the gable peak. A small rear shed addition at the northeast corner of the house has been partially removed, with only its east wall remaining. A side-gabled detached garage/cottage is set back and to the northwest corner of the property. **(Figure 4, Figure 5, Figure 6, Figure 7, and Figure 8.)**



Figure 4. South (front) façade, view north.



Figure 5. North façade, view southeast. Red arrow indicates east wall of partially removed shed addition



Figure 6. Long view of south façade of property from Pepper Drive. Roof of garage/cottage indicated by red arrow.



Figure 7. Garage/Cottage at northwest corner of property, south façade.



Figure 8. Garage/Cottage at northwest corner of property, east and north facades.

PEER REVIEW OF 2025 HISTORIC RESOURCE EVALUATION

The following sections provide Page & Turnbull's opinion on the adequacy and findings of the sections comprising the 2025 Historic Resource Evaluation. They are organized to match the organization of the 2025 HRE report and when appropriate, include recommendations and/or additional information and analysis.

Table of Contents and Report Organization

A table of contents is provided as is appropriate per industry standards.

DISCUSSION

The organizational structure of the contents differs from that which is outlined in the California Office of Historic Preservation's (OHP) online manual, *Instructions for Recording Historical Resources*.² This OHP guidance document outlines the level of documentation and information required for recording and evaluating sites and individual resources for eligibility or inclusion in, for example, the California Register. Based on this OHP published guidance and Page & Turnbull's professional experience, we recommend that an historic resource evaluation report begin with an introduction, methodology and a high-level summary of findings. This overarching introduction should be followed by brief discussion of the resource's existing historic status (if any), which is then best followed by the complete physical description of the resource. The discussion of any related historic context(s) as applicable is most suitable after having provided a full description of the existing conditions of the resource, supported by photographs. As per the *Instructions for Recording Historical Resources*, subsequently, a discussion of whether the resource being evaluated meets the criteria of significance in relation to the historic context(s) concludes the report. No further comments related to the organizational structure of the 2025 HRE will be provided.

Introduction

The introduction of the 2025 Historic Resource Evaluation provides a brief overview of the property and outlines its existing historic status. A proposed project at the property is referenced, which implies the context of the evaluation preparation. The introduction references the applicable California Code of Regulations and Public Resources Code sections and hence, framework that the evaluation was completed under and includes the professional qualifications of the preparer. The primary author of the 2025 HRE, Stacy De Shazo, Principal Architectural Historian at Evans & DeShazo, appears to be an appropriately qualified architectural historian to prepare this assessment. Per the Evans & De Shazo website, she has a master's degree in Historic Preservation from Savannah College of Art and Design and over 20 years of experience in the historic

² <https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>.

architectural and cultural resources survey, identification, and evaluation in California, Oregon, Washington, and Alaska.³

DISCUSSION

Page & Turnbull notes that the introduction does not explain why the title page of the 2025 HRE indicates that it was initially prepared on March 4, 2025, but “updated, April 21, 2025.” Page & Turnbull recommends an explanation or at least acknowledgement that the HRE was subsequently updated after initial preparation be included in the introduction.

Location

The location section of the 2025 HRE provides the street address, the Assessor Parcel Number (APN) of the property, the parcel size, linear distances from nearby streets, and provides the property location on a USGS 7.5 quadrangle map.

DISCUSSION

A more precise location map is not provided within the 2025 HRE, though one is included in the appended DPR 523A forms. Page & Turnbull recommends that a location map that provides more specific existing contextual information (e.g., the immediate surroundings), such as that seen in **Figure 1** and **Figure 2** (above) be provided, in addition to the USGS quadrangle map.

Regulatory Setting

The regulatory setting of the 2025 HRE explains the overall nature of California Environmental Quality Act (CEQA) as it applies to cultural resources, including those that may be classified as “buildings” as defined by Cal. Code Regs. Tit. 14, § 4852. California Code Regs. § 15064.5 is cited to outline the criteria for listing in the California Register and therefore when a cultural resource shall be considered “historically significant” by a lead agency, such as the City of Los Altos [Community Development Department]. The regulatory setting section of the 2025 HRE also describes from a local regulatory perspective why the 2025 HRE was prepared. This section indicates that the City of Los Altos requested an updated “local” evaluation of the property. Thus, the City of Los Altos Criteria for Designation as per Municipal Code Chapter 2. Historic Preservation Section 12.44.040 is outlined.

DISCUSSION

Although the regulatory setting section includes the applicable state regulatory language, Page & Turnbull recommends adding a statement explaining the need from the CEQA perspective for the preparation of this 2025 HRE. For example, Page & Turnbull understands that CEQA applies to

³ See: <https://www.evans-deshazo.com/#/owners>.

“projects” proposed to be undertaken or requiring approval from state or local government agencies. Historic and cultural resources are considered to be part of the environment. Because the property was designated as a Historic Resource in the Los Altos Historic Resources Inventory, the property would be considered a historical resource for the purposes of CEQA review of potential projects which are subject to this state legislation.

Methods

The methods section of the 2025 HRE explains the actions the preparer took to investigate and research the property, including how and from what sources or repositories or field surveys information was collected. The methods Evans & De Shazo, Inc. utilized are consistent with industry standards.

DISCUSSION

However, the date the architectural survey conducted by the preparer is not indicated in this section; it is indicated only later in the document on Page 31. Page & Turnbull recommends the date be provided in the methods section for temporal context between the date of the survey and the date the 2025 HRE was prepared. It is important to demonstrate that the existing conditions observed at the time of the site visit, including new or in-progress alterations, accurately reflect the conditions of a property at the time of the evaluation.

Historical Setting

The historic setting section of the 2025 Historic Resources Evaluation provides a brief history of the geographical area where the property is located. The section begins with the history of the general area that is now referred to as Los Altos specifically from the years 1822 (during Mexican rule) to the 1850s. The establishment of and subsequent history of the development of Los Altos from the 1870s, when it consisted of small and large farms, to 1890, when larger farms and cattle ranches were subdivided and sold as smaller farms, through the early 1900s, when land development and transportation companies began buying land in Los Altos and subdividing them as part of planned developments. A broad discussion of Los Altos through the decades spanning the 1930s, 1940s, 1950s, and 1960s through the 1970s then follows.

DISCUSSION

The history of the property's more localized neighborhood is not discussed. Providing the history of the property's 'place' from the broad (county, city, or town) to specific environs (neighborhood or development area) is industry standard as it thereby establishes an historic context for the property. The formalized establishment of Los Altos as a town is also not clarified. Understanding this relative to the subject property's neighborhood's establishment, if available/as applicable, and/or the

property's date of construction would assist in placing the property in appropriate developmental context. Page & Turnbull therefore recommends including specificity to the establishment of Los Altos as a town or city, as well as to the historical development of commercial and/or residential construction in the fledgling community and/or property's immediate neighborhood, as applicable. For example, according to the 2012 City of Los Altos Historic Resources Inventory:

Many believe that the real beginning of Los Altos start[ed] with the Altos Land Company and acquisition of Sarah Winchester's 100 acres in 1906. This land became what is known today as the downtown triangle...the creation of a new town-site to be called "Banks and Braes." Just when the name was changed to Los Altos is unknown, but we do know that the Altos Land Company and the University Land Company were formed in 1907...With the establishment of the town in 1907 came the beginnings of subdivisions (although a few earlier subdivisions were recorded prior to 1907)...By 1911, according to Eastman's history of the town, Los Altos had only fifty homes; by 1913, only thirty-two telephones had been connected. The majority of properties in the residential context are homes built in the 1920s and 30s, reflecting the growth of the area. By this period, the central business district had been established, roadways were more complete, and working-class families could afford to move to "the county" and grow a few apricot trees. The dominant house types in this category include: Bungalows, Mission, Period Revival (Tudor, Colonial, Provincial), Prairie, Italian Villa, Spanish Colonial Revival.⁴

The central business district is a six-block triangle bound by San Antonio Road to the east, Foothill Expressway to the west, and West Edith Avenue to the north. The subject property is situated on Pepper Drive on a block immediately east of San Antonio Road near to the southern portion of the central business district.

Property History

This section of the 2025 HRE describes the history of the subject property, beginning when it was acquired as part of a much larger expanse by the United States government in 1848, subsequently surveyed by 1865 and ultimately subdivided, first as part of the L.S. Clarke Subdivision (1895) and then as part of the Adams Subdivision (1920). Plat maps showing these subdivisions with the property's location within them are included. Early aerial imagery dating to 1930, appears to show the house, and a 1939 aerial photograph that appears to show both the house and the detached garage/cottage are included.

⁴https://www.losaltosca.gov/sites/default/files/fileattachments/historical_commission/page/36161/hri_section_ii_historic_cont_ext.pdf

The property history section also includes a table (referred to as Table 1) that lists the owners and occupants of the property beginning in 1928, upon the initial owner's acquisition of the parcel and construction of the current house, through to 1993. The table incorporates biographical information available regarding the owners as determined via historical newspaper articles and records on the genealogical site, Ancestry.com. The property history section also includes an image of a news article announcing the completion of the 1929 home, as well as a news article showing a portrait of the original owner's family. The Property History section subsequently includes tables outlining the property's available permit history, which spans from 1994 to 2024.

DISCUSSION

The historic aerial photographs provided in the 2025 HRE property history section are pixelated and difficult to discern. Page & Turnbull recommends only including imagery that is a high resolution and discernible. Page & Turnbull also recommends completing the owners/occupants table (Table 1) to include all transfers up to and including the current ownership.

Table 1 of the 2025 HRE states: "In ca. 1933, the detached garage was constructed (Figure 16), likely by Harry. During this time, it appears the rear shed addition was added to the northeast corner of the house." However, a historical source which supports this date of construction or further explanation of how the determination of the year ca. 1933 was made is not provided. Rather, the referenced Figure 16 is an aerial image dated to 1939. Page & Turnbull recommends, therefore, clarifying how the ca. 1933 date for construction of the detached garage/cottage was determined. Page & Turnbull acknowledges that Sanborn Fire Insurance Maps do not encompass the Pepper Drive block and that many historic aerials are often difficult to discern, regardless of resolution.

In contrast to the 2025 HRE's assumed date of construction for the garage, Treanor's 2024 Standards Compliance Report for the property states "the outbuilding appears on a 1948 aerial, but was likely constructed as a detached garage at the time the house was built."⁵ In addition, a 1929 newspaper article included in the 2025 HRE property historic section mentions that the original owners/occupants (the Van Epps) were "occupying temporary quarters on the property," while their new home was under construction.⁶ Based on a high resolution version of the 1930 historic aerial photograph (**Figure 9**), Page & Turnbull suggests that the existing detached garage/cottage was indeed already present and was the structure serving as the owner's temporary residence. In a clearer version of the 1939 historic aerial photograph (**Figure 10**), the detached garage/cottage at the northwest area of the property is also present. Page & Turnbull concurs with the 2025 HRE that

⁵ Treanor, "81 Pepper Drive, Los Altos, California Standards Compliance Report," dated September 20, 2024, 4.

⁶ *The Peninsula Times Tribune*, "To Occupy New Home," July 15, 1929.

the construction of the small rear addition attached to the northeast corner of the house, which does not appear to exist in the earlier image, likely dates to ca. 1939. Page & Turnbull would therefore clarify that the detached garage/cottage dates to ca. 1929 and the house dates definitively to 1929, while the rear addition to the house dates to ca. 1939.

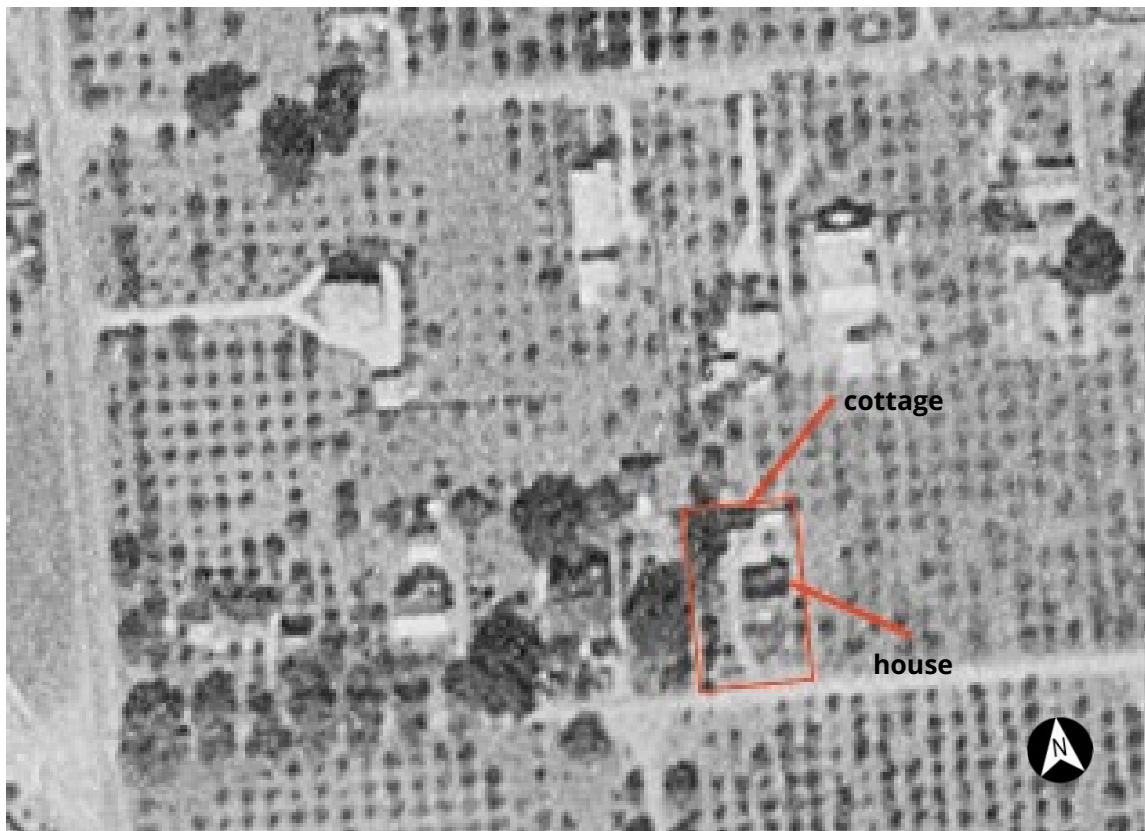


Figure 9. 81 Pepper Drive, 1930. Parcel outlined in red with house and what appears to be the detached 'garage' at rear. Source: University of California Santa Barabara Flight C_1180, Frame 9, 1930. Parcel boundary and notations added by Page & Turnbull.



Figure 10. 81 Pepper Drive, 1939. Parcel outlined in red with house, detached garage/cottage and rear addition. Source: University of California Santa Barbara Flight C_5750, Frame 286-9, 1939. Parcel boundary and notations added by Page & Turnbull.

Page & Turnbull also recommends indicating that the permit information has been compiled from written records held by the City of Los Altos and that permit records did not include the original date of construction nor the original builder or architect for the primary residential building, nor did they include information related to the construction of the detached garage/cottage. Page & Turnbull further recommends that the property history section include the entire chronology of the property to present, including information related to any ancillary structures built prior, later, or later removed from the site, such as the detached garage / cottage. In addition, other elements of the construction chronology that can be compiled through analysis of aerial photographs, maps, other

historic images, news articles, as well as visual inspection, as available, are recommended to be described. Page & Turnbull recommends indicating that apart from the approved permits, dated 1994 and 1999, no other changes were formally documented by permit or other available sources.

A visual analysis of the building's form and materiality by Page & Turnbull shows that the house's ca. 1939 shed addition at the northeast corner of the house has been partially removed, with only its east wall remaining. This shed addition appears to have been partially removed sometime between 2023-2024 based on aerial imagery. The north wall of the house has, as a result, also been stripped of its cladding and cornice. Extending from the north wall is a concrete slab on grade with unfinished wood decking, evidencing the initiation of construction of a new rear addition (since paused). Visual inspection of the house also indicates that exterior doors on the house appear to be non-original, including the paneled primary entry door on the front facade, as well as the sliding doors on the rear (north) façade. A contemporary arched arbor has been installed at the front entrance as well and has been present since at least 2007 based on available street-view imagery. Vinyl windows are located on the remaining east wall of the shed addition, likely having replaced earlier multi-lite wood windows.

A detailed construction chronology should also include a history of other site components, if extant. Thus, Page & Turnbull recommends that the following additional construction history of the detached garage/cottage and the overall site be included as well. No known formal documentation of changes to the garage/cottage exist; an application to convert the building to a legalized accessory dwelling unit in 2024 was not approved. However, visual inspection indicates the ancillary building has undergone changes over time. A contemporary entry door is located on the south façade, leading to a contemporary wood deck. Decorative, fixed paired doors are installed in a large, possibly former garage opening on the north façade. Although most windows are wood, they appear to vary in size and type from one-over-one hung window, six-light hopper windows, four-over-four hung window, evidencing the ad-hoc construction and/or alterations of the building. The garage/cottage has a replacement asphalt shingled roof, likely installed at the same time as the that of the house in the 1990s per a roofing permit.

Page & Turnbull research indicates the bounds of property have not changed since the residence's construction, and aerial imagery indicates the site has always included both a front and rear yard, with hardscape area or driveway along the western side leading to the detached garage/cottage. The driveway today is of concrete with brick accents, while immediately south of the garage/cottage the area has received contemporary cobblestone pavers. Wooden fencing is located along the north, west, and east perimeter of the Property, portions of which appear to have been installed along the west at an unknown date between 2007 and 2011, based on street imagery. Prior to 2015, too, a short picket fence also delineated the front yard from the street.

Architectural Context

The architecture section of the 2025 Historic Resource Evaluation discusses the history and identifying features associated with the Colonial Revival architectural style in America. The 2025 HRE indicates that the 1929 house on the property is reflective of this particular style and therefore, as is industry standard, the section establishes an historic architectural context for the property. The 2025 HRE appropriately references Virginia McAlester's, *A Field Guide to American Houses*, 2014 edition, which is considered the definitive guide to residential architecture in America.

The 2025 HRE states that residences designed in the Colonial Revival style typically include the following characteristics:

1. "Symmetry in façade – although 10% of Colonial Revival were asymmetrical.
2. Hipped or gabled roofs with boxed eaves.
3. Fanlights and/or sidelights around main door.
4. Double-hung sash windows, often set in pairs.
5. Clapboard and brick exterior cladding.
6. Classical detailing (sometimes exaggerated), including pediments, columns or pilasters leading to elaborate entries."

In addition, the 2025 HRE indicates there are subtypes of the style that include Asymmetrical, Hipped Roof with Full-Width Porch, Hipped Roof without Full-Width Porch, Side Gable Roof, Centered Gable, Gambrel Roof, Second-Story Overhang, One-Story, Three-Story and Built-In Garage.

DISCUSSION

The Colonial Revival context could be expanded to provide further description of certain detailing typically featured in Colonial Revival style. For instance, per the 2023 edition of *A Field Guide to American Houses*, typical of many Colonial Revival roof cornices is that they are almost always part of a boxed roof-wall junction with little overhang and are frequently decorated with dentils or modillions; some may have open eaves and rake. In addition, windows are usually rectangular and hold multi-pane glazing in one or both sashes.⁷ It is also noted that masonry predominates in high-style Colonial Revival examples whereas vernacular examples were generally of wood before about 1920, with masonry progressively becoming more common as veneering techniques became widespread in the 1920s.⁸

⁷ Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), 412.

⁸ Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), 412.

Page & Turnbull also recommends the architectural context section provide further clarification on the applicable subtype(s) to the property, particularly the one-story subtype, of which the property at 81 Pepper Drive most closely resembles, and which according to McAlester, are generally known as "Cape Cod cottages."⁹

A Field Guide to American Houses defines the one-story subtype of Colonial Revival or Cape Cod cottage as follows:

One-Story Subtype – ..."one-story Colonial Revival houses are also common. These are generally Cape Cod cottages, loosely patterned after early wooden Cape Cod folk houses of eastern Massachusetts, usually with the addition of Georgian or Federal-inspired doorways. These were built throughout the Colonial Revival era but were particularly common in the 1940s..."¹⁰ McAlester also indicates, "The Cape Cod is the most common form of one-story Colonial Revival house. As a form, it originated in the early 18th century and continued with few changes through the 1950s."¹¹

In addition, Page & Turnbull recommends that images of properties that exemplify the One-Story or Cape Cod cottage subtype, as shown in *A Field Guide to American Houses*, be provided to visually explain the property's architectural context. As seen in figures below, despite these examples' moniker of one-story, they are side-gabled and have dormers at an upper level or half-story, not unlike the property at 81 Pepper Drive (**Figure 11, Figure 12**)."¹²

⁹ Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), pp. 411-12.

¹⁰ Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), 412.

¹¹ Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), 427.

¹² Virginia Savage McAlester, *A Field Guide to American Houses* (Revised Edition. New York: Knopf, 2013, reprinted 2023), 427.

Colonial Revival – One-story Subtype – Excellent Examples

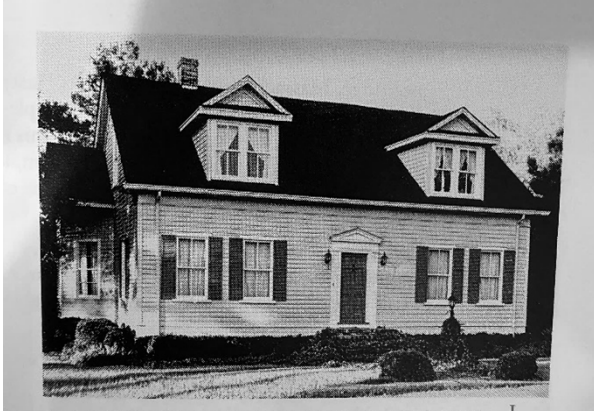


Figure 11. One-story subtype example, ca. 1920s.
Source: *A Field Guide to American Houses*, 2023 reprint edition, p. 427.



Figure 12. One-story subtype example, 1929.
Source: *A Field Guide to American Houses*, 2023 reprint edition, p. 427.

The 2025 HRE does not include a comparative analysis. It is typically industry standard to compare a property to comparable works of the relevant architectural style and era. In this case, comparable works of Colonial Revival style, single-family residential architecture built in the early 20th century, especially the one-story or ‘Cape Cod cottage,’ and typically within the general vicinity of the subject property would be compared. It is important to “compare the resource with others that belong to the same property type and relate to the same historic context” because “it will help establish the significance of the resource,” or will help provide a clear rationale to support an ineligible finding.¹³

Page & Turnbull provides herewith several examples of Colonial Revival style architecture residential homes constructed in the early 20th-century located within the general vicinity of the subject property, both of which have been designated as local historic resources or local historic landmarks by the City of Los Altos. These properties were determined by reviewing the list of Los Altos Historic Landmarks and the list of Los Altos Historic Resources in conjunction with the OHP Built Environment Resources Directory (BERD) for Santa Clara County, issued in September 2022 as well as through visual analysis using online street imagery.¹⁴

¹³ <https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>.

¹⁴ <https://www.losaltosca.gov/historicalcommission/page/historic-inventory>; and OHP BERD – County of Santa Clara, <https://ohp.parks.ca.gov/pages/1068/files/Santa%20Clara.csv>

Table 1: Single-Family Residential and Colonial Revival Style Homes			
Address	Style	Est. Year of Construction*	Designation
1448 Fowler Lane	Dutch Colonial Revival / Gambrel roof	1900	Los Altos Historic Landmark
1570 Kensington Circle	Colonial Revival / Side-Gabled	1922	Los Altos Historic Resource

**Year of Construction from State of California Office of Historic Preservation Built Environment Resource Directory or Santa Clara County assessor*

Page & Turnbull notes that per the National Register, an excellent example of an architectural style “must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.”¹⁵ Based solely on visual analysis of current street view photography, Page & Turnbull thus augments the comparative analysis list with the following discussion of characteristics of the known Colonial Revival-style examples. It should be noted that Page & Turnbull has not conducted a comprehensive construction history of these properties.



Figure 13. 1448 Fowler Lane. Source: Google Streetview

¹⁵ National Register Bulletin No. 15: How to Apply the National Register Criteria of Evaluation, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.



Figure 14. 1570 Kensington Circle Source: Google Streetview.

- 1448 Fowler Lane, **Figure 13**, expresses the gambrel roof subtype, also referred to as Dutch Colonial Revival-style, featuring steeply pitched gambrel, containing a nearly full second story and separate dormer windows flanking a shed dormer above and accentuated front entry with a decorative crown supported by slender columns which form an entry porch.
- 1570 Kensington Circle, **Figure 14**, expresses the side-gabled Colonial Revival style, featuring symmetrically-balanced windows, with the second floor hung windows containing multi-light panes in both sashes. Its front entry is accentuated and features a decorative crown supported by slender columns which form an entry porch.

In comparison to the comparable properties detailed above, both those in the surrounding area and those seen in *A Field Guide to American Houses* (all referenced above), Page & Turnbull finds that the design of 81 Pepper Drive, provides a modest example of the Colonial Revival style, in particular the one-story/'Cape Cod cottage' subtype **Figure 15**.

The house at 81 Pepper Drive is one story with half-story above and features a side-gabled roof and is clad in wood siding (clapboard). The material palette and form are consistent with that of Colonial Revival one-story Cape Cod cottages, in particular vernacular and pattern-book examples. Fenestration consisting of rectangular, double-hung multi-light windows, some with false shutters and set in pairs at the first floor, is symmetrically balanced. The wood windows have ogee lugs (**Figure 18**). The roof features gabled dormers and a cornice decorated with dentils and eave returns (**Figure 16**). The fenestration and roof detailing are typical of the Colonial Revival Cape Cod cottage.

The front door, however, does not contain the decorative crown (pediment) supported by pilasters or slender columns to form a front porch normally exhibited in Colonial Revival architecture. Rather, the central front door is set with a flat surround with sidelights only (**Figure 17**). (The arbor/trellis is a contemporary installation.)



Figure 15. Primary (south) façade, view north.



Figure 16. Primary façade, detail of cornice with dentils and eave return.



Figure 17. Detail of front entry.

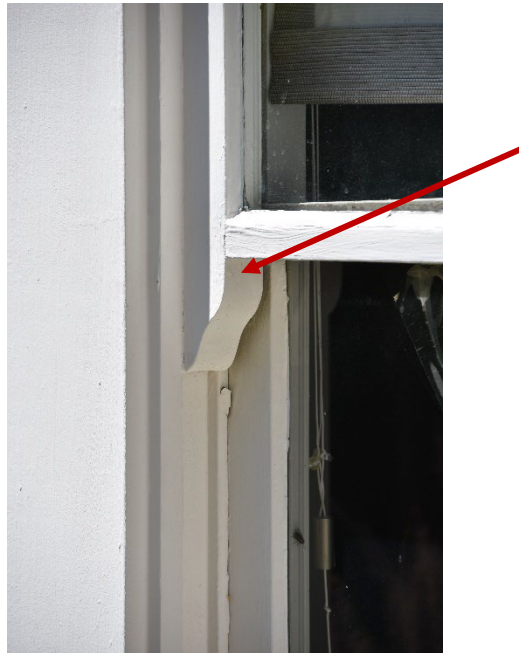


Figure 18. Detail of ogee lug on double-hung wood window.

Historic Architectural Survey

This section of the 2025 HRE provides a physical description of the existing property. The property's existing components (at the time of the survey) including the house and detached garage/cottage, as well as the associated landscape or lawn are each described, as is their architectural style, if any. Physical descriptions of each of the house, garage/cottage and landscape are accompanied by photo(s), yet there is a lack of an aerial image or site plan indicating the location of each of the two buildings on the property. The physical description otherwise generally adheres to industry standards.

DISCUSSION

However, the *Instructions for Recording Historical Resources* state that, "Descriptions of buildings, structures, and objects should identify construction details, materials, workmanship, and alterations."¹⁶ Page & Turnbull typically therefore includes, *following* the physical description section, a detailed construction chronology specifically related to the building and, if applicable, other site components. This may include a building permit history, if available, and/or notations of alterations determined by field survey and/or analysis of historical maps, newspapers and/or photographs as available and/or some combination thereof. Page & Turnbull's observations related to this have already been discussed above.

Evaluation for Historical Significance

The evaluation for historical significance section of the 2025 HRE indicates the context in which the property at 81 Pepper Avenue was evaluated by the preparer: Colonial Revival style architecture for the year of construction, 1929. An explanation of the California Register is subsequently provided in this section along with its relationship to the National Register and the similarities and differences in the guidelines between the two registries. Qualifications required for a property to be listed in the California Register are provided. The section indicates a property must possess significance under one of the four California Register criteria and have historic integrity to qualify for listing. The definition of historic integrity is also provided, indicating it consists of evaluating seven aspects that include location, design, setting, materials, workmanship, feeling, and association.

The property is then evaluated under each of the four California Register criteria and judged in relation to its historic contexts.

The 2025 HRE found that the property appears to be ineligible for California Register under all criteria. Because the property was recommended as ineligible for California Register listing, an

¹⁶ <https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>.

integrity assessment and list of character-defining features was not included, per industry standards.

DISCUSSION

This section should also explain that the property was evaluated under the context of early 20th century development of the City of Los Altos (historical context). In addition, Page & Turnbull recommends explaining that the entire property was evaluated under the historical context and that only the house was evaluated under the architectural context, given the ancillary component (garage/cottage) of the property does not reflect any architectural style.

Page & Turnbull, however, concurs with the findings of the 2025 HRE that the property does not appear to be individually eligible for listing under California Register Criteria 1, 2, 3, and 4. Page & Turnbull summarizes the 2025 HRE findings below and provides supplemental information under the Criteria, as needed. The explicit definition of each Criteria, as provided by the California Register, is also included prior to the evaluation.

Criterion 1/ Events: *It is associated with events or patterns of 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.*¹⁷

2025 HRE Finding: The 2025 HRE finds that the property, 81 Pepper Avenue, does not appear to be individually eligible for listing in the California Register under Criterion 1, as the property has not contributed to the broad patterns of history in Los Altos, the state, or the nation.

Page & Turnbull Discussion: The current house and garage/cottage at 81 Pepper Drive was constructed during the time when most properties in Los Altos's residential context, as per the *Los Altos Historic Resource Inventory*, were constructed, that is, in the 1920s and 1930s, which was reflective of the growth of the area after its earlier (1907) establishment. By this time, the central business district had been established, roadways were more complete and families, including the working class, could afford to relocate to the town. The extant property at 81 Pepper Drive, was constructed at the end of the 1920s, later than other Colonial Revival-style residential buildings in the general vicinity (per Table 1 of this report). Although associated with the general trend of growth in the 1920s, the property is not specifically important and thus does not convey significance for its association with that particular growth period (Event). Furthermore, research did not identify that the property contributed to any other significant events or other patterns of local, state, or national cultural heritage.

¹⁷ Criterion definitions are provided by the California Register, https://ohp.parks.ca.gov/?page_id=21238.

Criterion 2/ Persons: *It is associated with the lives of persons important to local, California, or national history.*

2025 HRE Finding: As stated in the 2025 HRE, the property, 81 Pepper Drive, does not appear to be individually eligible for listing in the California Register under Criterion 2.

Page & Turnbull Discussion: The Harry P. Van Epps family owned the current property from its 1929 construction until 1945, however research did not identify that any family member having an association with the occupancy or ownership of 81 Pepper Drive was significant to the history of Los Altos, the state, or nation. According to the 1930 federal census, Van Epps was a carpenter in the “house building” industry. Given his trade, there is the possibility that Van Epps constructed the house and/or garage/cottage at 81 Pepper Drive, however, no documentary evidence was found to confirm this. The property subsequently changed ownership no less than ten times and research did not identify that persons important to local, California, or national history owned or occupied the property.

Criterion 3/Architecture: *It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.*

2025 HRE Finding: As stated in the 2025 HRE, 81 Pepper Drive does not appear to be individually eligible for listing in the California Register under Criterion 3.

Page & Turnbull Discussion: The 1929 house exhibits some elements of Colonial Revival style, and particularly the one-story or Cape Cod cottage subtype (due to its form and massing), a subtype built throughout the Colonial Revival era and that became especially common in the 1940s. The house contains such Colonial Revival characteristics as a side-gabled roof, symmetrically balanced fenestration consisting of double-hung, multi-light windows with false shutters and paired at first floor with a centered front door. The roof features gabled dormers and a cornice decorated with dentils and eave returns. However, the house does not express the accentuated front door normally character-defining of Colonial Revival style, featuring a decorative crown supported by pilasters or slender columns to form a front porch. Rather, as a modest representation of the style, evidenced also through its wood cladding in lieu of masonry and lack of elaborate front entry, the house thus does not fully exemplify the distinctive characteristics of the Colonial Revival style required to be individually eligible for listing in the California Register, nor does it exemplify a method of construction, nor does it possesses high artistic values. And, as no architect of record is known, the house does not represent the work of a master.

Criterion 4/Information potential: *Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.*

2025 HRE Finding: As indicated in the 2025 HRE, the property at 81 Pepper Drive does not appear to be individually eligible for listing in the California Register under Criterion 4 as a building or property that has the potential to provide information important to the prehistory or history of the City of Los Altos, state, or nation.

The 2025 HRE clarifies that, “While most often applied to archaeological sites, Criterion 4 can also apply to built environment resources that contain important information. For a building to be eligible under Criterion 4, it must be a principal source of important information, such as exhibiting a local variation on a standard design or construction technique can be eligible if a study can yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.”

Page & Turnbull Discussion: Page & Turnbull concurs with the 2025 HRE finding, but recommends affirming that 81 Pepper Drive does not feature construction or material types, or embody engineering practices that would, with additional study, provide important information, and that evaluation of this property was limited to age-eligible resources above ground and did not involve survey or evaluation of the subject property for the purposes of archaeological information.

Local Assessment

The local assessment and recommendation section of the 2025 HRE indicates that the house is a local historic resource, and that an updated local assessment was requested to determine continued eligibility for local listing, inclusive of the house, garage/cottage and other site features. The 2025 HRE explains that Los Altos Municipal Code Section 12.44.040 outlines the three criteria for eligibility for local designation as a historic resource or historic landmark and that all three criteria must be met for a property to be eligible as a historic resource or historic landmark.

The 2025 HRE found that the property appears to be ineligible as a local historic resource or local landmark. Page & Turnbull concurs with the findings of the 2025 HRE that the property does not appear to be individually eligible for listing under the Los Altos Municipal Code Section 12.44.040. Page & Turnbull summarizes the 2025 HRE findings below and provides supplemental information under the criteria, as needed. The explicit definition of each criterion, as provided by the Municipal Code, is also included prior to the evaluation.

A. Age. *A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).*

As stated in the 2025 HRE, the property, 81 Pepper Drive, including its house and detached garage/cottage are over 50 years old. As such, the property meets the required local Criterion A.

B. Determination of Integrity. *A structure or property should retain sufficient historic integrity in most of the following areas:*

- 1.Design: The combination of elements that create the form, plan, space, structure and style of a property.*
- 2.Setting: The physical environment of a historic property.*
- 3.Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*
- 4.Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*
- 5.Feeeling: A property's expression of the aesthetic or historic sense of a particular period of time.*

Page & Turnbull understands that, as the 2025 HRE points out, for the purposes of National Register or California Register evaluations, integrity analysis is only completed *if* a building, structure, object, site, or district is found to be significant. As stated by the National Register, "Integrity is ability of a property convey its significance."¹⁸ Therefore, if a property is not found significant under any area, then generally no integrity analysis is conducted.

However, in accordance with Los Altos Municipal Code Section 12.44.040 and thus, for the purposes of local evaluation, a determination of integrity as Criterion B for local eligibility is provided in the 2025 HRE prior to a finding of local significance. As stated in the *Los Altos Historic Resources Inventory*,

"The evaluation process consists of three steps which are summarized below. The first step is to determine whether or not the property is over fifty years of age [...] The next step is to determine whether the property retains enough original materials and features to convey its value as a historic resource [...] If a resource meets the age requirement (or demonstrates the potential for exceptional significance) and retains

¹⁸ National Register Bulletin 15; How to Apply the National Register Criteria for Evaluation, 44;
https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

physical integrity, the next step is to determine if the resource has historic significance.”¹⁹

The following sections address each aspect of integrity included in Criterion B for the local inventory, with a summary of the 2025 HRE’s findings followed by Page & Turnbull’s discussion.

1. *Design:* The 2025 HRE finds that the 1929 house remains intact, and modest elements of Colonial Revival design are present, but it lacks distinctive features including a prominent front entrance, consisting of columns or pilasters and therefore lacks the integrity of Colonial Revival design.

Page & Turnbull does not concur with the 2025 HRE’s assessment of design integrity. As stated, the house appears to retain its original 1929 side-gable form, and design elements include symmetrical fenestration consisting of rectangular, double-hung multi-light windows, some with false shutters and set in pairs at the first floor. The roof also continues to feature gabled dormers, and a cornice decorated with dentils and eave returns. It is not documented to have had an accentuated front entrance including a decorative crown supported by pilasters or columns to form a front porch, thus the lack of such does not lessen its integrity of design.

In Page & Turnbull’s professional opinion, thus, the house retains the integrity of its design as a single-family home built in 1929 in a modest Colonial Revival style. In addition, in Page & Turnbull’s professional opinion, the overall property, that is, the house, its garage/cottage and landscape also retain integrity of design. The spatial relationship between the house and garage and the front and rear yards remains intact.

2. *Setting:* The 2025 HRE finds that the 1929 house and its garage/cottage and landscape retain integrity of setting because, despite growth to Los Altos overall, the immediate environment remains a small neighborhood with modest-sized houses set back from the street and designed in a variety of styles.

Page & Turnbull concurs with the assessment that the property retains integrity of setting.

3. *Materials:* The 2025 HRE finds that the 1929 house retains the original wood clapboard siding on three of the four elevations; ten divided light wood windows; two paired, divided light windows; and wood shutters on the primary façade appear to be original from 1929 and that therefore the house retains integrity of materials. The 2025 HRE

¹⁹ https://www.losaltosca.gov/sites/default/files/fileattachments/historical_commission/page/36161/hri_full_doc.pdf, Page I-1.

also finds that the ca. 1929 garage/cottage retains a reduced integrity of materials although its exterior cladding and some windows appear original.

Page & Turnbull concurs with the general assessment that the house and garage/cottage retain integrity of materials.

4. *Workmanship:* The 2025 HRE finds that the workmanship evident on the house does not show any special skill in Colonial Revival design, as it does not include the Classical detailing (sometimes exaggerated), including pediments, columns or pilasters leading to elaborate entries, which is where workmanship is often showcased through hand-tooling, carving, painting, or joinery.

Page & Turnbull does not concur with this assessment. As stated in the 2025 HRE, “the workmanship evident on the 1929 house is very modest,” and “...the wood windows with lugs show workmanship.” Page & Turnbull would argue that therefore the physical evidence of workmanship, as defined by the Municipal Code remains. Moreover, the National Register provides guidance on how to evaluate the integrity of a property and states that workmanship can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing.”²⁰ The lack of sophisticated configurations therefore does not indicate a lack of workmanship. The use of standardized window sash, dentils, shutters, and wood siding does reflect workmanship evidencing the “applications of both technological practices and aesthetic principles,”²¹ in this instance, the technological advance of mass milling production of the time. In Page & Turnbull’s professional opinion, the house therefore retains integrity of workmanship.

5. *Feeling:* The 2025 HRE finds that because the house was not intended to meet the grander expectations of a Colonial Revival house, it fails to evoke the architectural details and spirit of the style, it does not retain integrity of feeling.

Page & Turnbull does not concur with this assessment. The definition of *feeling* according to the Municipal Code is the expression of the aesthetic or historic sense of a particular period of time. As stated in the 2025 HRE and to which Page & Turnbull agrees, the 1929 house is a modest example of Colonial Revival architecture. As Page & Turnbull furthered, it is a modest example of a Colonial Revival one-story/“Cape Cod cottage” subtype. Although not an excellent example of the Colonial Revival style, given the lack of an accentuated and more elaborate front entry, the house does appear to express the aesthetic of a modest Cape Cod cottage of the 1920s and therefore retains integrity of feeling.

²⁰ National Register Bulletin 15; How to Apply the National Register Criteria for Evaluation, 45;
https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

²¹ National Register Bulletin 15; How to Apply the National Register Criteria for Evaluation, 45;
https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

As such, in Page & Turnbull's professional opinion, the Property's 1929 house meets all requirements of local Criterion B. In Page & Turnbull's professional opinion, the Property's ca. 1929 detached garage/cottage and landscape do not meet the required local Criterion B.

C. Historic Significance. *A structure or property should be clearly associated with one or more of the following areas of significance:*

- 1.Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;*
- 2.Person/People: Associated with the lives of persons important to the local, California or national history;*
- 3.Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or*
- 4.Archaeology: Yields important information about prehistory or history of the local area, California or the nation.*

1. Event: The 2025 HRE finds that the property does not appear to be clearly associated with any event that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the U.S. for local listing

Page & Turnbull concurs with the findings of the 2025 HRE that the property does not meet the required local Criterion C under Event but provides the following clarification. Although the 1929 house is associated with the general trend of growth in Los Altos during the 1920s, the property is not specifically important to this trend and thus does not convey significance for its association with that particular growth period.

2. Person/People: The 2025 HRE finds that the property does not appear to be clearly associated with the lives of persons important to the local, California or national history.

Page & Turnbull concurs with the findings of the 2025 HRE that the property does not meet the required local Criterion C under Person/People but provides the following clarification. Although, the original owner/occupant of the house, Harry Van Epps, was a carpenter in the "house building" industry, no documentary evidence was found to confirm his hand in the construction of the 1929 home. The property subsequently changed ownership no less than ten times and research did not identify that persons important to local, California, or national history owned or occupied the property.

3. The 2025 HRE The 2025 HRE acknowledges that the 1929 house is associated with Colonial Revival architecture but states it does not embody the distinctive characteristics of Colonial Revival architecture, does not embody a method of construction and does not represent the work of a master or possess high artistic values.

Page & Turnbull concurs with the findings of the 2025 HRE that the property does not meet the required local Criterion C under Architecture/Design but provides the following clarification. Page & Turnbull acknowledges that the 1929 house exhibits elements of Colonial Revival style and particularly exhibits the one-story or Cape Cod cottage subtype (due to its form and massing), a subtype built throughout the Colonial Revival decades and that became especially common in the 1940s. The house contains such Colonial Revival characteristics as a side-gabled roof, symmetrically balanced fenestration consisting of double-hung, multi-lite windows with false shutters and paired at first floor with a centered front door. The roof features gabled dormers and a cornice decorated with dentils and eave returns. However, the house does not express the accentuated front door which is typically character-defining of houses in the Colonial Revival style, featuring a decorative crown supported by pilasters or projecting slender columns to form a front porch. Rather, as a modest representation of the style, evidenced also through its wood cladding in lieu of masonry and lack of elaborate front entry, the house thus does not fully exemplify the distinctive characteristics of the Colonial Revival style required to be individually significant, nor does it exemplify a method of construction, nor does it possesses high artistic values. And, as no architect of record is known, the house does not represent the work of a master.

4. Archeology: The 2025 HRE states the Property was not assessed for archaeology.

The evaluation of this property was limited to age-eligible resources above ground and did not involve survey or evaluation of the subject property for the purposes of archaeological information and thus, the property does not yields important information about prehistory or history of the local area, California or the nation. As such, Page & Turnbull concurs with the 2025 HRE that the Property, inclusive of the 1929 house, ca. 1929 detached garage/cottage and landscape do not meet the required local Criterion C under Archeology.

Recommendation

The 2025 HRE recommendation section indicates that because the house has lost integrity and/or historic significance, the house is recommended to be removed from the Los Altos Historic Resource Inventory. The 2025 HRE recommendation section indicates the Property's detached garage/cottage and landscape are not eligible for local listing.

DISCUSSION

Page & Turnbull concurs with the 2025 HRE recommendation that the house be removed from the Los Altos Historic Resource Inventory. However, Page & Turnbull clarifies the reasoning as to why it should be removed from the local inventory. The 2011 *State of California Department of Parks & Recreation (DPR) 523A and 523B forms*, dated June 8, 2011 and prepared by Circa found the 1929 house at 81 Pepper Drive to be, "a good representative example of its style" with a "good degree of integrity of location, workmanship, feeling, design and materials," and "therefore...eligible for listing on the Los Altos Historic Resources Inventory."

Page & Turnbull does not concur with the 2011 Circa assessment that the house is a good example of its style. In other words, the house has not demonstrably lost integrity and/or historic significance since the prior (2011) finding of eligibility as stated in the 2025 HRE. Rather, although the Property, inclusive of the 1929 house and ca. 1929 garage/cottage meets the local Criterion A as age eligible, and the house meets local Criterion B as it retains integrity relative to its 1929 date of construction, type, and architectural style, it does not meet local Criterion C as a historically significant resource. Therefore, 81 Pepper Drive is ineligible for inclusion on the Los Altos Historic Resource Inventory.

Bibliography

The 2025 Historic Resource Evaluation provides a bibliography which is the list of the sources used and referred to within and to prepare the evaluation. This bibliography meets industry standards.

Appendix

The appendix of the 2025 Historic Resource Evaluation provides the *California Department of Parks and Recreation (DPR) Form - Primary Record and Continuation Sheets* for the property. The information within the forms appears to provide the physical description of the property, photographs and an evaluation like that provided in the 2025 HRE. Page & Turnbull notes the DPR Form includes, however, an aerial image of the property and although not explicitly demarcated, the house and its ancillary component (garage/cottage), are legible. This type of image was lacking in the remainder of the document as previously discussed.

CONCLUSION

At the request of the City of Los Altos Community Development Department, Page & Turnbull has reviewed the 2025 Historic Resource Evaluation for 81 Pepper Drive (APN 170-41-007), Los Altos prepared by Evans & De Shazo, Inc. updated April 21, 2025. Page & Turnbull reviewed the 2025 HRE and other related materials and conducted a field survey and online research. Page & Turnbull has identified several areas for potential improvement of the 2025 HRE. However, Page & Turnbull does

not recommend that the 2025 HRE need be revised for the City of Los Altos to make a finding. With the combined contents of previous evaluations and Page & Turnbull's additional research and field survey, Page & Turnbull concurs with the finding of the 2025 Historic Resource Evaluation that the property does not appear eligible under any of the California Register criteria, nor does it meet the local Criteria for inclusion on the Los Altos Historic Resource Inventory.

From: Jennifer Jacobsen
To: Brittany Whitehill
Subject: 81 pepper drive
Date: Monday, July 21, 2025 8:36:17 PM

> Hi Brittany,
> I just wanted to write a quick note that I am not supportive of moving 81 Pepper off the historic registry as I feel it's very important to preserve historic homes and our history in Los Altos. While I know it's an investment in Los Altos from historic home owners, I do think it's important to preserve these homes.
>
> What is the process and next steps for this?
>
> Thanks!
> Jennifer Jacobsen

From:
To: [Brittany Whitehill](#)
Subject: 81 pepper drive
Date: Monday, June 9, 2025 7:20:32 PM

Brittany-I do not support removal of 81 Pepper Drive from the historic resources inventory. There is nothing that has changed its historic nature since it was originally listed more than 25 years ago. The house is historic, being an early example of housing that was built almost 100 years ago as part of the Adams subdivision. There are 5 houses in the immediate neighborhood that were originally built after the subdivision was approved circa 1910 and 4 are almost contiguous along Pepper Drive (41, 55, 81 and 121). The house adds to the historic integrity, context, and setting of all of those homes.

The current homeowners bought the property with full knowledge of the house being listed as a historic resource. If the homeowners want to expand the house, there is ample room in back to built onto the structure without adversely affecting its historic character.

From:
To: [Brittany Whitehill](#)
Subject: 81 pepper drive
Date: Monday, June 9, 2025 7:20:32 PM

Brittany-I do not support removal of 81 Pepper Drive from the historic resources inventory. There is nothing that has changed its historic nature since it was originally listed more than 25 years ago. The house is historic, being an early example of housing that was built almost 100 years ago as part of the Adams subdivision. There are 5 houses in the immediate neighborhood that were originally built after the subdivision was approved circa 1910 and 4 are almost contiguous along Pepper Drive (41, 55, 81 and 121). The house adds to the historic integrity, context, and setting of all of those homes.

The current homeowners bought the property with full knowledge of the house being listed as a historic resource. If the homeowners want to expand the house, there is ample room in back to built onto the structure without adversely affecting its historic character.

From:

Sent: Saturday, August 16, 2025 8:23 AM

To: 'HCPublicComment@losaltosca.gov' <HCPublicComment@losaltosca.gov>

Subject: comments regarding 81 pepper drive august 18th meeting agenda item 2

Below are my comments as regard removing 81 Pepper Drive from the Historic Resource Inventory. I would urge the Historical Commission to deny that removal.

Neither historic consultant did an adequate job in determining if 81 Pepper Drive should be kept on the Los Altos Historic Resource Inventory. While it is tempting to believe “an expert”, the fact is the first expert’s opinion was refuted, in part, by the second expert. So I would encourage the Historic Commissioners to use their input with care as experts rely on reaching conclusions based on the information they have. Neither expert appears to have had the below information in making their determinations. This omission was highlighted on page 96 of the Page and Turnbull report, which only discussed this issue in broad terms, lacking the specificity required to understand how the home actually fits with the development patterns in Los Altos and more generally in the region.

Both “experts” claimed 81 Pepper did not meet criteria 1-that the property was not associated with.....a significant contribution to broad patterns of local or regional history.....

In fact, the house is a prime example of the pattern of suburban development that occurred in Los Altos post 1910. Prior to that time, Los Altos was primarily populated by large orchards with modest-sized homes. Over time, large orchard properties were subdivided into small, single-family lots that were sold. The buyers were San Franciscans buying summer homes, wealthy individuals who built homes larger than the earlier modest-sized homes, or local residents who built modest-sized homes on the properties which had no orchard. The latter includes many who had migrated to California from around the US and around the world. They became part of the growing middle class of residents in Los Altos. Los Altos and the Bay area have, for the past 100 years been a destination for individuals and families. It has made this region both highly diverse and the entrepreneurial capital of the world.

The Van Epps, original owners of 81 Pepper, were born in Iowa and South Dakota, their parents from New York and Iowa. Their 81 Pepper house was one of the modest-sized homes with no orchard, part of the trend that was a departure from the prior housing model of Los Altos. It was designed and constructed to be the residence of the Van Epp’s, a middle-class family who moved from one home in Los Altos on Hawthorne to a new house on Pepper Drive, and later in life, moved to a single-story home on Lyell. This illustrates a pattern of development and a story that has long resonated with many in the Bay area.

Marvin Adams subdivided his 30-acre orchard in 1911 and the subdivided lots were offered for sale. This was the first significant subdivision of land in Los Altos after the Shoups first

established the town in 1909. Some lots sold, most did not and remained as orchards. A small number of those original homes still stand and are on the HRI. There are a number of homes in the Adams subdivision that are of significance as they are examples of the various housing trends that contributed to the growth of suburbia. 55 Pepper is a larger home example, while 81 Pepper is an example of the more modest sized homes. 121 Pepper was a summer home while 41 Pepper and 70 Marvin were mid-sized primary residences. Together they help tell a story of the development of the town. Each is important, but as a group they are more significant in demonstrating the pattern of development and change in Los Altos as it evolved from a agricultural based community to a residential city.

Based upon the above, the Historical Commission should make a determination that 81 Pepper meets all three criteria for inclusion on the HRI and therefore the request to remove it from the inventory should be denied.

I have attached a copy of the Adams subdivision map for your reference and would be happy to answer any questions you may have. Thank you for your consideration.

From: Maria Bautista

Sent: Monday, October 27, 2025 12:01 AM

To: Public Comment - HC <HCpubliccomment@losaltosca.gov>

Subject: Public Comment Historical Commission, October 27, 2025: Item #3 81 Pepper Drive

Please consider the preservation bias presented in the 81 Pepper Drive (1929) analyses before you tonight. What we choose to preserve informs future biases and if we continue to only preserve houses of grandeur, we come to believe that only wealth and prestige matter.

**HISTORIC SIGNIFICANCE:
EVENT (C1)**

“October 29, 1929, more infamously known as Black Tuesday, exacerbated a crisis that would become one of the most dramatic economic downturns in American history: the Great Depression. Millions of Americans were unemployed or underemployed as banks failed and market demand for products plummeted. Confidence in the very foundations of capitalism and government also quickly evaporated. By 1933, over 15 million Americans were unemployed. With the election of Franklin Roosevelt came a shift in policy from the Hoover years. The government focused first on relief followed by recovery and then reform. The set of programs that became known as the first New Deal created over thirty agencies and an extraordinary expansion of the federal government.” (photogrammar.org)

With these agencies, efforts like the Farm Security Administration (FSA) [1935-1944] began intentionally documenting people’s daily lives, especially through photography. The historical record of the era became a record of the working class. People at that time were already deciding what was important about that era: workers and migrants.

It is insensitive and incorrect to suggest that the VanEpps, or any residents, were somehow less significant to the history of Los Altos than anyone else. They and their house at 81 Pepper Drive were exactly representative of one of the most significant periods in Los Altos and American history.

Between the turn-of-the-century Gilded Age and the post-war speculative housing/industry boom, there was a space in which one generation survived on hard work and modesty. 81 Pepper Drive, together with its very few remaining era-specific neighbors, helps us better understand and respect the realities of the Great Depression era and its deep historical significance.

**HISTORIC SIGNIFICANCE:
ARCHITECTURE/DESIGN (C3)**

Los Altos and Silicon Valley are famously known for garages.

With the advent of Southern Pacific Railroad, early 1900s Los Altos saw a new development pattern emerge: the railroad suburb. However, in 1929, 81 Pepper Drive also portends the automobile-era suburban development.

The detached garage is an associated and contributing element to 81 Pepper Drive. Constructed contemporaneously with the house, the detached garage is characteristically reached by a side driveway. This arrangement is distinct and distinguished from the post-war 1950s tract homes with attached front-facing garages that became the norm. Moreover, the garage's intact original footprint and placement, driveway alignment, and form and scale reinforce the historic spatial organization of the parcel at 81 Pepper Drive.

Also, between 1919 and 1932 an unusual building style appeared, promoted by Bay Area architects Yelland and Comstock. These homes and cottages took on a childlike quality, often miniaturized in scale and borrowing from European Medieval styles; examples include houses on Marvin and Hawthorne Avenues. By contrast, the near perfectly-preserved Colonial Revival Cape Cod Cottage that is 81 Pepper Drive exemplifies the onset of a return to foundational American architecture as people turned to more economical and classical house designs. That Los Altos has intact examples of both architectural movements within a neighborhood speaks to the value and inherent architectural significance of 81 Pepper Drive.

81 Pepper Drive meets both Criterion 1 and 3 for Historical Significance and rightly belongs a part of the Los Altos Historic Resource Inventory.

Sincerely,

Maria Bautista

From: Lizebeth Burch

Sent: Sunday, October 26, 2025 9:14 PM

To: Public Comment - HC <HCpubliccomment@losaltosca.gov>

Subject: Once again.... CONCERNING THE CHANGES TO #81, PEPPER DRIVE

A brief comment to remind you of the reason there IS an Historical Commission in Los Altos.

You are there to PRESERVE what small numbers of historical structures/locations remain in this City. Not to allow developers, or private owners, to demolish them, however persuasive their arguments may be for doing so. Our history in terms of years is so brief; surely whatever structures now remain of historic value should be saved?

First the diminution of our Historic Orchard adjacent to the Library. A tragedy. And now, one of the very few remaining original homes left for posterity. It has been stated to us that the owners of this property were aware of its historical status upon purchase. If they had desired a new residence, they should have bought one, and they should not now be allowed to change or demolish a "listed building".

We urge you to take more care in your decisions now, and in future. They will permanently alter the historic landscape of our City, and what is gone can never be replaced.

Please vote NO on the request to change or demolish #81, Pepper Drive. Thank you.

Don and Lizebeth Burch

Sent from my iPad

From:

Sent: Saturday, October 25, 2025 12:15 PM

To: Public Comment - HC <HCpubliccomment@losaltosca.gov>

Subject: Re: Historical Commission Meeting October 27, 2025- Agenda Item #3: 81 Pepper

Meeting Date Correction in Subject Line

On Fri, Oct 24, 2025 at 11:21 AM Maria Bautista wrote:

Dear Historical Commissioners,

Thank you for your careful consideration of the 81 Pepper Drive request to terminate designation from the Los Altos Historic Resource Inventory.

Attached please find a letter making a case in favor of preserving 81 Pepper Drive's place among our historic properties of significance.

In addition to some additional facts and perspective, I have noted in the letter the Los Altos Municipal Code 12.44.040 that guides your decision.

It is the case that your responsibility and duty require that- "The ONLY legitimate reason for terminating a designation...is due to LOSS of integrity and/or historic significance."

I appreciate your thoughtfulness.

Best,

Maria Bautista

IN SUPPORT OF 81 PEPPER DRIVE, LOS ALTOS



In 1911, Los Altos had only 50 homes according to “Eastman’s History of Los Altos Area.” By 1929, the house at 81 Pepper superbly represents what may be the first house in the first planned development subdivision of orchard land in unincorporated Los Altos.

On Pepper Drive, the Adams House at 55 Pepper Drive (1906) is a designated historic landmark that still stands along with the palm trees planted when the house was built. Its owner Marvin Adams was a sugar broker from the East Coast who retired at 36; his wife Margaret had been a college professor. Their surrounding ranch included 30 acres of apricot, peach and cherry orchards, and they planted the pepper trees that gave their street its name.

Multiple Daily Palo Alto Times ads in summer 1911 explicitly list “M.O. ADAMS, Grower, Los Altos,” promoting “Adams’ Fruit.” As “M.O. Adam’s,” Marvin was also the subdivider of the Adams Subdivision (recorded April 3, 1911). Santa Clara County’s historic survey/tract-map dataset shows the Adams Subdivision, Los Altos surveyed in March 1911 and recorded April 3, 1911, with M. O. Adams listed among the owners and W. H. Myrick as surveyor [Map Book N1, Page 30].

Per 1929 aerial maps, the house at 81 Pepper is the first house in one of the first subdivisions in Los Altos (incorporated 1952). It is a two-story wood-frame residence constructed 1929 in the

Colonial Revival style blending elements of American colonial architecture with Victorian-era details like its denticulated trim. Key features include a symmetrical façade, central front door, gabled roof with dormers, multi-paned double-hung sash windows with shutters, and a clapboard exterior.

The Colonial Revival style was adapted to early suburban development after the 1893 Chicago World's Fair which had an architectural theme of Classic Revival. Across the United States, streetcar suburbs in particular soon saw houses that echoed the classicism of the colonial style. The style is quintessentially North American, a nostalgic return to the Georgian and Federal architecture of New England, and built nationwide.

Some Colonial Revival houses were designed by architects, others put up by builders from pattern books. Its sense of stability and connection to national history made the style popular through to the 1950s, in part as a reaction against rapid industrialization. In the Bay Area suburban context, the popularity of Colonial Revival coincided with the growth of the commuter-era suburbs and a desire for a "traditional" American house form. It is a testament to this trend that 81 Pepper is located in easy walking distance of the commuter railway that connected Los Altos to San Francisco and San Jose.

According to the Los Altos HRI: While in 1910 businesses seemed to be related to farming, Los Altos had some white collar workers including administrative railroad workers, attorneys, physicians, professors, creatives and real-estate professionals related to a growing town. Based on job descriptions, workers were already commuting from Los Altos to San Francisco.

Together with a handful of historic properties on Pepper, Marvin and Lyell, 81 Pepper tells the story of modest housing erected during the Great Depression (1929-1939) that is intentionally not grand architecture, but signifies a faith in the foundational principles of America during a devastating era. Its workmanship is a combination of handiwork and products- like perhaps windows- that stem from a burgeoning housing industry. That 81 Pepper has most of its original exterior detail in excellent condition supports its place as a cherished residence for nearly 100 years.

The very fact that there have been 11 owners of 81 Pepper since 1929 speaks to the "starter home" that defines the American Dream. Its modesty is its significance. Both in style and intention, 81 Pepper actualizes the small town aesthetic before the rise of the suburban tract home industry of cookie-cutter designs that characterize post World War II development in the region.

In Los Altos, 81 Pepper Drive, with its superbly maintained integrity, is representative of the city's earliest suburban development — the first wave of what would become neighborhood

homes as orchards began to be subdivided. From original 5 and 10 acre lots for “gentlemen farmers,” further subdividing like seen on Pepper Drive introduced smaller lots accommodating close-in single-family living.

As such, 81 Pepper Drive appears to be first house located on an orchard subdivision and the only early century Colonial Revival in the city’s Historic Resources Inventory (HRI), further affirming its historic significance.

Records:

The Adams Subdivision appears to be the first town-adjacent subdivision:

- Santa Clara County Records: N1,"28,29",Map of the Adams Subdivision,Hawthorne Ave.,Marvin Ave.,San Antonio Ave.,Pepper Dr.,Marvin Ave.,Third St.,Whitney St.,Los Altos,"March, 1911",4/3/1911,"M.O. Adams, Essie Diericx, Nannie K. Field, William",W. H. Myrick
- Marvin Adams (b.1905) Oral History Los Altos History Museum Catalog #1991.087.001

Determination according to Los Altos Municipal Code:

12.44.090 - Termination of designation.

The **only legitimate reason** for terminating the designation of a historic resource or historic landmark is when clear evidence is presented that shows the resource no longer meets the criteria of Section [12.44.040](#) **due to loss of integrity and/or historic significance.**

12.44.040 - Criteria for designation.

A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

A. Age. (YES) A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).

B.Determination of Integrity. A structure or property should retain sufficient historic integrity in most of the following areas:

1.(YES)Design: The combination of elements that create the form, plan, space, structure and style of a property.

2.(YES)Setting: The physical environment of a historic property.

3.(YES)Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

4.(YES)Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

5.(YES)Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

C. Historic Significance. A structure or property should be clearly associated with one or more of the following areas of significance:

1. (YES)Event:Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;
2. (YES)Person/People: Associated with the lives of persons important to the local, California or national history;
3. (YES) Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or
4. (N/A) Archaeology: Yields important information about prehistory or history of the local area, California or the nation.

From: Anne Roberts

Sent: Monday, October 27, 2025 8:19 AM

To: Public Comment - HC <HCpubliccomment@losaltosca.gov>

Subject: 81 Pepper Drive

Dear Commissioners:

Please retain the Historic Home designation for 81 Pepper Drive. Los Altos has the Historic Homes designation because of our rich history from the early 1900's. You have been appointed Commissioners to retain this heritage.

Los Altos needs to retain our unique properties and not become just another "bedroom community" on the peninsula. Many of us chose to live here because of our historic homes and heritage. I have lived here for 50 years and been active in the Los Altos History Museum precisely because of our long history.

The owners of this property knew that it had a Historic Home designation when they purchased it. Please don't let them demolish our past and replace it with just another modern home in Los Altos.

Thank you for preserving our history!
Anne Roberts

Sent from my iPad

Members of the Los Altos Historical Commission:

I am writing you to urge you to deny the removal of 81 Pepper Drive from the Los Altos Historic Resource Inventory for the following reasons:

1. Neither of the historic evaluation reports address the history and impact the Adams subdivision had on the transformation of Los Altos 30-100 acre orchard lands to a residential town. The Page and Turnbull peer review (the "Review") points out this significant deficiency in the initial report they reviewed on page 8 of the Review: "the history of the property's more localized neighborhood is not discussed".

The Adams subdivision of the 30 acre working orchard, approved in 1911 (not 1920 as incorrectly stated in the Review) appears to be the first major subdivision of land into small, buildable lots after the original 100-acre purchase and subdivision of Sarah Winchester's land by the Los Altos Land Company that led to the creation of Los Altos circa 1907. The variety of different-sized lots in the Adams subdivision allowed a broad socio-economic group to buy the lots and build houses. Some of the earliest homes built in the Adams subdivision remain and numerous are HRI designated, landmarked and/or Mills Act properties. These include 41 Pepper (1928), 55 Pepper (1906), 81 Pepper (1929), 121 Pepper (1933), 236 Eleanor (1914), and 90 Marvin (1939). Others early homes include 24 Marvin (1936), 60 Marvin (1924), 184 Hawthorne (1925) and 166 Hawthorne (1930).

81 Pepper is notable as an excellent example of a relatively modest home built for a working-class family. This was a big departure from the other early homes in town, many of which were either summer homes for wealthy San Franciscans or residences for the wealthy or upper middle class. The more modest homes were built for carpenters, teachers and shopkeepers and were important and necessary for the city to be able to grow and prosper. 81 Pepper meets the criteria of "a significant contribution to the broad patterns of local or regional history." In fact, the house is a prime example of the development pattern of development in both Los Altos and the region.

2. The Review discussed whether 81 Pepper met the criteria for historic significance based on its architecture. The Review included two pictures of "excellent examples of 1 ½-story Colonial Revival homes" on page 16. These two examples are remarkably similar in design, scale, ornamentation and overall look to 81 Pepper. However, the Review then mentions that in order to determine whether 81 Pepper should be recognized for its architecture, it had to be determined if there were better examples extant in Los Altos. The Review identified two homes which it considered better examples: a two-story

Dutch Colonial Revival home on Fowler and an even larger, two-story Colonial Revival home on Kensington. Neither is a 1 ½-story Colonial Revival. Neither is of the same scale. Neither is similar in design, ornamentation or scale as the two excellent examples shown in the Review. 81 Pepper is.

So, while the two other homes in Los Altos may be excellent examples of Colonial Revival, neither is an example of 1 ½-story Colonial Revival as is 81 Pepper. The Review does not mention any other 1 ½-story Colonial Revival homes in Los Altos. The Review states the importance to look for better examples of a 1 ½-story Colonial Revival home. The review is then silent as to the existence of any better examples of 1 ½-story Colonial Revival home. Instead, it points to two examples: a much larger, two-story Dutch Colonial Revival and very large two-story Colonial Revival homes in Los Altos. The fact remains that 81 Pepper is an excellent example of a 1 ½-story Colonial Revival home. The need to mention in the Review the larger homes further underscores the importance of 81 Pepper as there are no other 1 ½-story Colonial Revival homes mentioned in the Review.

Therefore 81 Pepper meets the criteria for historic significance based upon its architecture.

Thank you for your consideration.

Jon Baer



Staff Report

Meeting Date: October 27, 2025

Prepared By: Sean Gallegos

Subject: 2026 Historical Commission Meeting Dates

RECOMMENDATION

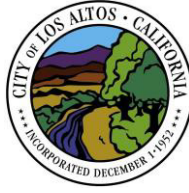
Discussion of the Historical Commission Meeting Dates for 2026

BACKGROUND

DISCUSSION

ATTACHMENTS

1. Staff Report



HISTORICAL COMMISSION AGENDA REPORT

Meeting Date: October 27, 2025

Subject: Meeting Schedule

Prepared by: Sean Gallegos, Senior Planner

Attachment: None

Recommendation

Review Historical Commission Meeting Schedule for 2026

Background

The Historical Commission Meeting Schedule outlines the commission's quarterly meeting schedule for 2026. The item provides the commission with the opportunity to finalize the quarterly meeting dates.

Discussion/Analysis

The Historical Commission convenes regularly on a quarterly basis, specifically on the fourth Monday of each month at 6:00 p.m. Meetings are held at the Los Altos Community Center, located at 97 Hillview Avenue, Los Altos, CA.

The following dates are proposed for the Commission's meetings in 2026:

- **January 26, 2026**
- **April 27, 2026**
- **August 24, 2026**
- **October 26, 2026**

During this meeting, the Commission will discuss and finalize the proposed meeting dates for 2026. Members are encouraged to provide input regarding the suggested schedule to ensure that all commissioners can attend and participate effectively.



HISTORICAL COMMISSION AGENDA REPORT

Meeting Date: October 27, 2025

Subject: 2024–2025 Mills Act Quinquennial Audit Update

Prepared by: Sean Gallegos, Senior Planner

Attachments:

1. Mills Act Inspection Summary
2. Mills Act Inspection Documents

Recommendation

Receive the report on the 2024–2025 Mills Act Quinquennial (Five-Year) Audit of 14 designated historic properties and provide comments to staff on the findings and next steps.

Background

Program Purpose

The Mills Act is a statewide economic incentive program established in 1972 under Government Code Sections 50280–50290. It encourages private property owners to preserve and rehabilitate qualified historic properties through contractual agreements with local governments. In exchange for a property tax reduction, owners commit to maintaining and rehabilitating their historic properties consistent with approved work plans.

Program Administration

The City of Los Altos participates in the Mills Act Program as part of its Historic Preservation Program, administered by the Planning Division of the Development Services Department. The City currently has seventeen (17) privately owned residential properties under active Mills Act contracts, all designated as historic properties pursuant to Los Altos Municipal Code Chapter 12.44. Once executed, contracts are recorded with the County Assessor’s Office to ensure application of the tax reduction.

Eligibility

Qualified properties include those designated as Historic Resources or Landmarks under Los Altos Municipal Code Chapter 12.44.

Subject: Mills Act Quinquennial Audit

Contract Requirements

Mills Act contracts have an initial ten-year term and automatically renew each year unless terminated by either party. Each contract must typically include a ten-year schedule of improvements plan consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Failure to maintain or preserve the property as required may result in cancellation of the contract and penalties as outlined in Government Code Section 50286.

Program Benefits

Participating property owners receive reduced property taxes through a special assessment formula administered by the County Assessor. In return, the City and community benefit from the ongoing preservation of Los Altos' architectural and cultural heritage, enhanced property maintenance, and the retention of historic character.

Program Oversight and Review

Government Code Sections 50280 through 50281 require that local governments inspect each Mills Act property at least once every five years to verify compliance with contract obligations. Contracts must include provisions for ongoing preservation, restoration, and rehabilitation consistent with the Secretary of the Interior's Standards and the State Historical Building Code.

The City of Los Altos conducts a quinquennial (five-year) audit of all active Mills Act contracts. The City's five-year audit process fulfills this requirement and ensures that all Mills Act properties remain eligible for continued participation in the program. The audit involves a review of owner-submitted documentation, self-inspection documents, and verification of compliance with contractual requirements. This process ensures that the program continues to achieve its purpose of preserving the City's historic resources.

On September 30, 2025, the City Council adopted the Mills Act Program through Ordinance, codified as Chapter 14.95 of the Los Altos Municipal Code. The ordinance formally establishes local procedures for implementing the Mills Act consistent with California Government Code Sections 50280 through 50290. It outlines eligibility criteria, contract application and review processes, and inspection and enforcement procedures. Adoption of this ordinance provides a clear administrative framework for the ongoing monitoring of participating properties and ensures long-term consistency in program administration and reporting. The program will be effective on October 30, 2025.

Analysis

In September 2024, staff initiated the quinquennial (five-year) audit cycle for all Mills Act properties that had reached at least five years since their last inspection. Fourteen of the seventeen contracts met this threshold and were included in the 2024–2025 audit. Introductory letters were mailed to those property owners requesting documentation of completed work consistent with their respective contracts and restoration plans, including photographs, receipts, and written summaries.

All fourteen property owners submitted audit documentation, demonstrating participation and compliance with the City's request. The remaining three properties were not included in this audit

Subject: Mills Act Quinquennial Audit

because their contracts were executed within the past five years and will be reviewed during the next audit cycle.

Of the fourteen Mills Act contracts, seven include a ten-year schedule of improvements plan consistent with the City's current Mills Act contract format. The remaining seven properties, located at 762 Edgewood Lane, 420 Yerba Santa Avenue, 55 Pepper Drive, 500 University Avenue, 439 Rinconada Court, 965 Berry Avenue, and 571 Cherry Avenue, are governed by earlier Historic Preservation Agreements that do not include a ten-year schedule of improvements plan for the restoration and maintenance of the historic property. Although these earlier agreements predate the City's current contract format, all Mills Act properties remain subject to the same preservation and maintenance obligations established by state law.

Staff's review confirmed that all fourteen audited Mills Act properties are in sound condition and consistent with program objectives. Documented work includes structural upgrades, roof and foundation repairs, exterior painting, drainage improvements, and landscape maintenance. Properties such as 762 Edgewood Lane, 420 Yerba Santa Avenue, 55 Pepper Drive, 500 and 220 University Avenue, 431 and 452 University Avenue, 439 Rinconada Court, 571 Cherry Avenue, and 965 Berry Avenue show continued investment in preservation. Properties that underwent full restoration at the time of their agreements, including 1365 Grant Road, 10 Yerba Buena Avenue, and 210 Alta Vista Avenue, remain well maintained with ongoing upkeep and landscape care consistent with the intent of the Mills Act program.

To ensure consistency and strengthen program administration, staff recommends that the Historical Commission support staff's efforts to request updated ten-year schedule of improvements plan for continued restoration and maintenance from all properties with expired or missing plans.

Environmental Review

This activity is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) of the CEQA Guidelines (Common Sense Exemption). The audit involves only administrative review and documentation of existing conditions and will not result in any physical changes to the environment.

Public Notification

A public meeting notice was mailed to property owners of Mills Act properties, and published in the newspaper.

At the time of preparation of the agenda report for the project, no comments were received by staff.