

# RESPONSE TO QUESTIONS FROM THE 4<sup>th</sup> CSG MEETING

HELD ON MARCH 2, 2021

- 1) Are Pine Hill I/II and Frenchman's Hill excluded from the Historic Assessment Requirements (HSA)?

The County has determined that homes in these neighborhoods will not require a Historic Significance Assessment (HSA) as part of Building Permit Application process unless the home meeting one of the following criteria:

1. The home was designed by an architect of significance;
2. The construction of the home utilized innovative or path-breaking technologies;
3. The home was associated with a historically significant activity or individual.

- 2) Why was the task of preparing 15 DPRs dropped from the scope of work?

The initial field work determined that over 150 homes could potentially be eligible for a historic assessment (preparation of DPRs). It would have taken significant time and effort to determine which 15 homes of the over 150 potentially eligible homes would be selected. Secondly, preparing the 15 DPRs would only benefit the selected homes within a small area, leaving the larger neighborhood without any added benefit. Lastly, the Department, wanted to ensure that the results of the historic study by the historic consultant would benefit all homeowners rather than just 15. Therefore, in lieu of the 15 DPRs, we asked the Consultant to provide additional documentation regarding the Architects of significance that have designed homes in the San Juan Neighborhood and listing additional references in the Report and its appendices. This additional information can be used to streamline the preparation of future HSAs. It will save significant time and resources for historians preparing future DPRs, to reference the Report and get extensive research specific for the Neighborhood in one location. All future HSAs for homes in the San Juan Neighborhood should utilize this Report in the preparation of their HSAs.

- 3) Will the County conduct the future areas of study for the suggested additional districts?

The County's General Plan Policy C-RC(i)24 states that the County will update inventories and evaluations of heritage resources, and survey resources as necessary to augment existing inventories. However, the County does not currently have funding approved for additional historic studies in the San Juan District. If authorized by the Board of Supervisors, the department will initiate additional studies and survey.

- 4) Can homeowners in the recommended district opt out or opt in into the proposed District?

The definition of a District is based on the defined character of the District and the identified homes that contribute to the character of the district. If the District designation is approved by the Board, homeowners of homes that contribute to the district would not have an option to opt-in or opt-out of it. Changes to homes/structures that are within the district will have to follow the Design

Guidelines that are part of the District.

- 5) How has this survey done anything to “protect, promote and preserve historic resources” if no homes from the San Juan Hill area will be placed on the Historic Resource Inventory (HRI)?

The study was conducted to determine a need to create a Historic District, and what changes to the development standards in the Zoning Ordinance would be needed to preserve the Historic Character. The historic consultant, based on their survey and research, found a few potential characteristics for Districts, and recommended the creation of a District in the lower San Juan Area as it had the strongest documentation and character defining features.

Separately, the County recently clarified that the 2000 Stanford GUP conditions apply to the San Juan Area that require buildings 50 years or older to provide a Historic Significance Assessment (HSA) in association with any new development. Going forward, individual homes applying for a building permit with significant changes, or a demolition permit, will require submitting DPRs as part of their HSAs. If the home is deemed a historic resource, it will be recommended for listing on the County’s Heritage Resource Inventory (HRI) to the HHC.

The Survey Report highlights the different historic aspects of the San Juan Neighborhood and will be a ready and available resource that will provide additional context for individual HSAs/DPRs to refer to in the future.

- 6) There needs to be further clarification on what conditions need to be met for an area to be considered a district. How does the identified district qualify under these categories?

The report and memo prepared by the Department’s Consultant (ESA) outlines the conditions that need to be met for an area to be considered as a District. These are available on the Study’s webpage. Furthermore, the Department is preparing an information package for the County’s Historical Heritage Commission (HHC) concerning historic districts in general scheduled for the April 15<sup>th</sup> HHC hearing. The HHC meeting is open to the general public, and details of how to access the meeting are available [here](#). The materials and video of the meeting will also be available on the County’s Board and Commission Meetings portal (same link as above). Staff will share the link to the meeting recording and the training material with the CSG after the training takes place.

- 7) Why does the report believe that the homes in Lower San Juan are more vulnerable than Upper San Juan? If many or all of these homes have been altered on the exterior, isn’t their integrity in question? Is the justification for being included in an historic district under “Event” enough given the alterations already made?

The historic consultant – ESA determined that the ‘Event’ associated with construction of these homes– the conscious decision to create affordable options for Stanford faculty and staff at the turn of the last century – was significant enough to consider creating a District.

The homes in the District were considered more vulnerable because some of the past alterations were already compromising a few of these homes, therefore a complete loss of the resource was

more imminent, as they may fail to classify as individual resources. By creating this district, they will garner additional protections going forward.

8) Why are the homes in the district being referred to as affordable?

The term “affordable” is used throughout the Study Report in context of housing costs in the Stanford/Palo Alto area in general, and; in the original intent during the conception of the area, in particular. It is not used in the modern planning context to reference low-income housing.

9) What protections do homes outside the district have to ensure they are not lost to demolition/development? 130 houses up on the hill could be eligible. It could be years before anybody determines that there could be historic districts. How will these homes be protected?

Per the existing requirements of the 2000 Stanford General Use Permit(GUP) Conditions of Approval, homes 50 years or older subject to a significant remodel, addition, or demolition, require the preparation of a Historic Assessment as part of the Building Permit Application. If the assessment determines the home to be historically significant, they would be presented to the HHC for recommendation.

As part of clarifying the 2000 Stanford GUP condition, the Department laid out the procedure that a building permit applicant would have to follow if their home is in the San Juan Neighborhood and is 50 years or older, during the presentation at the CSG meeting and at the second public meeting. The process diagram and matrix can be found [here](#). See answers to questions 2 & 5 for the explanation of how the Study’s Report would be utilized to determine the Historic Significance of an individual home in the San Juan Neighborhood.

10) Can you require a Historic Significance Assessment (HSA) now for the homes that are vacant? How do you protect further deterioration?

The County cannot require a property owner to conduct an HSA unless there is a building permit application for a significant remodel, addition, or demolition of the building, in accordance with the 2000 Stanford GUP Conditions of Approval.

11) What is the difference between ‘Design Guidelines’ and ‘Development Standards’?

Design Guidelines are design recommendations, developed to fit the context in which they are being applied. For example, a guideline can state that homes built in a particular neighborhood should be complementary to the form and massing typical to the neighborhood. While design guidelines give ‘guidance’ on the shape and form of buildings or improvements, they do not establish specific regulatory standards, such as a zoning setback or height restriction.

A Development Standard is a zoning regulation that sets specific requirements for development, such as setbacks or building height restrictions.

- 12) Will there be Development Standards proposed beyond the identified district, covering the other parts of the San Juan Neighborhood?

The Department is evaluating proposed zoning development standards addressing the San Juan Hill (Upper San Juan) area. The intent of these standards will be to preserve the visual character of individual residential properties as viewed from the public streets. The Department is evaluating establishment of a site/lot coverage limit requirement for buildings, and a minimum frontage width requirement. Both of these development standards are intended to help maintain the existing mature landscaping in this neighborhood and minimize the number of driveways in the frontage areas. The Department is also looking at the allowable density to determine if those can be modified through this effort or if would have to be approached in a separate process.

- 13) If the design guidelines would just be for the historic district, how would those be different from the Secretary of Interior Standard? Who determines compliance? Please provide an explanation of how you will develop design guidelines? Who will be developing them and what consultation with the community will you perform?

The Design Guidelines primarily would cover the relationship of a new building or modifications to an existing building with the adjacent buildings in the district, in order to maintain district wide characteristics. The following of Secretary of Interior's Standards would only be applied to individual buildings, and would be a subset of the District wide guidelines. The compliance to the District Guidelines will be the responsibility of the Department Staff, as is being done with the New Almaden District, and other non-historic design guideline districts in the County.

Once the HHC makes its recommendation to the BOS to approve the District, the Department will begin drafting the design guidelines. The draft guidelines will be presented to the Community for review. After the Guidelines are finalized, the HHC recommendation and accompanying guidelines will be presented to the Board of Supervisors for approval.

- 14) Why did you choose Stanford and not any other properties in Palo Alto? What was the specific direction from the Board?

During the January 29, 2019 Board of Supervisors' (BOS) hearing on the approval for the Cabrillo Ave subdivision in San Juan, the Board identified the need to review if the current zoning development standards in the San Juan area complements the existing neighborhood's character. This observation came about after hearing public comments presented at the meeting. The Board deferred to the Housing, Land Use, Environment & Transportation Committee (HLUET) as the forum to follow up on the issue.

Following that meeting, in April 2019, the HLUET Committee, upon further hearing comments from San Juan residents' concerns about the historic character of the neighborhood, and the potential incompatibility of the existing zoning with the existing character of the neighborhood; directed the Department to conduct a study to determine if there are changes warranted to the existing zoning for the San Juan area. The proposed methodology for conducting a historic study and review of the

zoning standards for the San Juan Area was reviewed by the HLUET Committee in June and September of 2019. The materials associated with this review are available on the Board and Committees meeting portal for the general public to review.

The County does not have jurisdiction over the City of Palo Alto, therefore cannot conduct any zoning study within the City's boundary.

- 15) Please identify the criteria the county staff will utilize to determine if a peer review is "required." The county ordinance C17-4 has identified the minimum amount of documentation for inclusion in the HRI.

- 1) description of the property's physical appearance
- 2) assessment of its historic, architectural, or archaeological integrity
- 3) statement of its significance
- 4) map with clearly delineated boundaries
- 5) photographs

However, we hear today several varying opinions if the district is significant or not for the theme identified. Would the county peer review this district evaluation for inclusion in HRI and will the consultant provide the minimum documentation required?

The requirement of a Historic Significance Assessment (HSA) does not stem from the Study or the resulting report. It is a requirement that is part of the 2000 Stanford General Use Permit Conditions of Approval (Condition O 1 & 2). An HSA has to be submitted for homes 50 years or older within the San Juan neighborhood when a building permit application is submitted for major alterations to a home. The HSA will typically require a peer review if the HSA determines that the home in question is not historically significant. It is expected that future HSAs will reference the Study Report to determine its historic context. County staff will provide HSA examples for applicants if requested. Peer Reviews are only for HSAs and not for the District recommendation by the Report.

- 16) When the County has used a peer reviewer for historic assessments, they have asked that all the referenced historical documents be cited within the DPR – will the same process and standards be applied to the ESA report?

The ESA report has extensive citations. Chapter 6 cites all the references used and that were accessible to the Consultants. In addition, in conducting their research, ESA requested that Stanford provide any reference documents that possibly Stanford may have related to the San Juan study area.

- 17) Are there other unincorporated SC County neighborhoods that have design guidelines?

Yes. The New Almaden area in the unincorporated county is a designated Historic District that has both development standards and design guidelines. The San Martin community, although not a historic district has design guidelines.

- 18) I am assuming that the houses within the proposed Historic District would be listed on the County's Historic Resources Inventory (HRI). Are these the only houses likely to be listed?

It depends. Homes that are identified as contributors to the district will have to be reviewed to see if they meet the Criteria for being listed on the HRI. The District designation would allow the County to provide protections to these homes even if they are not on the HRI list. The District itself being listed on the County's HRI is being researched to make that determination.

- 19) What is our role as the CSG other than these appearances?

The Community Stakeholder Group (CSG) was established to be a sounding board for the processes and findings of the historic and zoning study, and to advise the Department during the project. We have utilized the CSG meetings to present findings and record the member's opinions on them. We also have utilized the CSG meetings to help disseminate information to the community at large prior to having public meetings to present the items and findings discussed at CSG meetings.

## SUBMITTED QUESTIONS FROM THE 4th CSG MEETING

**Allyn Taylor:**

- 1) Stanford has had the aspiration of having faculty and students live close together near campus. To that end they were willing to let Mrs. Hoover build some cottages at her expense for junior faculty, during the same period when she and her husband were being actively engaged with Stanford, he on the Board of Trustees and donating money to start what is now the Hoover Foundation. Likewise Stanford was willing to have three of its professors purchase set plans from the Bungalowcraft company and hire contractors to build modest houses. All I can see that Stanford did directly to address the housing issue was build the DoubleHouses, which were needed once the shoddily built Decalogue houses were torn down. So I have trouble seeing where there is any "event" at all let alone one which can be seen as a significant contributor to the broad patterns of national, state or local history as required by the various codes. I would like to have examples where a similar "event" was sufficient to find an historic district.
- 2) Where in the permitting flow chart does it diverge from what is required of other unincorporated county homeowners when they are undertaking renovations or demolitions?
- 3) Does a peer review trump an initial HSA conclusion and does an HHC decision trump a peer review?
- 4) In the permitting process are there additional historic reviews inside the LAP process?
- 5) On what basis do you feel Lower San Juan is more liable to development?
- 6) How does the peer review process work currently?
- 7) Many questions about when and how the peer review will happen.
- 8) Will the Historic District be on the HRI?
- 9) Will there be rules about upkeep/maintenance of homes within the Historic District?

**Sandra Pearson:**

Most of the questions and comments I made at the March 3 CSG meeting were based on the draft report. I hope you will also take those comments into consideration. After reflecting on our discussion that evening and reviewing the draft again, I am troubled by the rationale in the Introduction, Evaluation of Lower San Juan and Conclusion and Recommendations.

*Chapter 1: Introduction*

1. ESA was tasked with determining “if the Residential District or portions of it merit designation as a Historic District.” This is part of a larger planning effort to determine if specific development standards need to be established. Based on the report, will a review of development standards be based on any neighborhood within Lower San Juan and San Juan Hill?
2. Figure 1 illustrates relatively uniformity in lot size, whereas in San Juan Hill many lots are irregularly shaped. Will you plan to establish different development standards for the two areas? Or will you focus only on the San Juan Hill area?
3. How has this survey accomplished the goal to “protect, promote and preserve historic resources”? Please clarify. As a result of the survey, will any homes from lower San Juan or San Juan Hill be placed on the Historic Resource Inventory? There is no evidence presented that substituting a detailed analysis of architects will ultimately be a “community benefit” or cost saving for homeowners who have to pay for an Historic Survey Assessment.

*Chapter 3: Evaluation*

The recommendation of a proposed historic district in Lower San Juan, based on an Event, seems significantly weaker than any of the recommendations for further study in the San Juan Hill Neighborhood. Please clarify, particularly in light of the extensive documentation in Appendix F of well-known architects who mainly designed homes on campus in San Juan Hill.

The rationale that the houses in Lower San Juan are more vulnerable to development and demolition also is unclear.

*Chapter 5: Conclusions and Recommendations*

4. 1. “Recommendations are also being made for future areas of study.”(5-1) Will the County conduct the future areas of study?
5. 2. (5-2) It appears that the County plans to “Develop design guidelines for the Lower San Juan Neighborhood Historic District.”

*Questions:*

- 1) Please clarify the County’s definition of terms, i.e., the difference between “design guidelines” and “development standards.”
- 2) Are design standards discretionary statements relating to architectural design, whereas development standards relate to land use, the age, and location of structures in relation to the lot?
- 3) Will the development standards be the same for the proposed Historic District and San Juan Hill?
- 4) Is it correct to assume that the following will also be completed by the County? If so, please specify when and who will “Develop,” “Evaluate,” and Explore,” these recommendations in the report.

**Justin Grimmer:**

*Questions and Notes on the CSG Report*

- 1) The argument for the district is nonsensical and implies that every subdivision in the county would eventually be protected by a historic district. This is clearly not the intent of the law. The report argues that a historical district is needed because a set of “affordable” homes were built over several years. The report fails to establish that the creation of these “affordable” homes was a particularly important moment in Stanford history, that anyone of note lived in those homes, or that the homes themselves are (or were) architecturally distinct. The only thing important about the homes is that they were built and they were built with a particular price point in mind. What’s more, this occurred over a period of 23 years---hardly an event. Does this mean that any cluster of homes built with a price point in mind would qualify as historic after 50 years? For example, would a neighborhood authorized by a board at a company deserve historical protection because it was created to provide houses at a particular price point? (Perhaps to attract residents to a particular town)? When I asked this question at the meeting, the consultant agreed it would be absurd to think that all subdivisions would qualify. Unfortunately, she couldn’t explain why Stanford’s decision to build homes over 23 years qualifies as a historic “event”. It is clear, then, that the reasoning in the report cannot justify a historic district. It would seem disingenuous and ad hoc to now invent a new set of reasons to justify the same historic district. Given the arbitrary reasoning for the district, it seems to me that there was a decision to make a district and the reasoning was decided upon later. I fail to see how this group of homes is “Associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States” Could the architect and the county provide a clear set of reasons why the logic of the historic district in Lower San Juan wouldn’t imply that every subdivision would qualify as a historic district?
- 2) What evidence is used to justify the assertion “These more modest houses in the Lower San Juan neighborhood are more vulnerable to development as many individual projects”. I see no evidence in the report that there is any risk of development, that Stanford has any plans for development, or that Stanford would be able to buy all the homes to develop the area. If no evidence is provided, please remove these evidence-free assertions from the report.
- 3) “Also, the theme of providing more affordable housing for faculty and staff was well documented in the historical record in the three distinct developments that are discussed below” Again, it makes \*no\* sense that building homes at a particular price point implies that there was something historic happening. Please explain, in detail, why these three distinct developments should be grouped together. Were other developments happening on Stanford’s campus at the same time? Does development with the theme of “nice homes for Stanford faculty” in San Juan qualify as historic with a similar theme?
- 4) In the report these homes were identified because “In the early decades, these were often transitional housing for faculty before they moved on to (or built) more permanent housing on- or off-campus. Early faculty residents were usually renters. Numerous students also rented room or adjacent cottages, sometimes earning room and board by helping with housekeeping and caregiving. University directories even reveal a double-house unit full of students, with no faculty resident. In later decades, faculty became owners of the double houses, undertaking necessary upgrading and remodeling and often restoring and preserving original features”. Could you explain why a set of homes built for relatively young Stanford faculty and students qualifies as historic? The report is clear that no important person conducted their research while living in these homes. How much more expensive would the homes have had to have been to not qualify as affordable?
- 5) “With smaller lots containing smaller homes the Lower San Juan Neighborhood has always been a more affordable option on the Stanford campus” As I discuss below, this is not a more affordable



option. Can you please justify the assertion that this has “always” been a more affordable option? Specifically, can you document how these homes were used as affordable houses over the last 20 years? Over the last 10 years? Can you provide a single example of young Stanford faculty over the last 15 years who have used these homes as affordable options before finding a more permanent residence on campus?

- 6) The notion of an “event” makes no sense in the report. The decision to build these homes, according to the report, occurs over 23 years. A university building homes at a lower price point over a quarter century doesn’t constitute an “event”. What is the maximum amount of time that can elapse before the start and end of an event?
- 7) In what sense is the construction of homes from a university at this time period “historic”? I know that where I went to college (a small town in Indiana) construction of homes was occurring before the homes here on Stanford. At land-grant universities across the country homes were being built to house new faculty. Is it the county’s position that any non-profit constructing housing for their employees constitutes a historic event?
- 8) The report describes homes as affordable when there is no sense that they are affordable. A cursory glance at Redfin shows homes that are valued from \$2.3 to \$3 million. There is no sense in which these homes are affordable--in fact they are some of the most expensive homes in America. What’s more, they aren’t even affordable for current faculty. These homes are 50-100% more than recent affordable homes built on campus (either in Olmstead Terrace or University Terrace). The reality is that the homes in the historic district are aspirational for Stanford faculty and (practically) only made available to faculty after a series of promotions. (I don’t think anyone below the rank of Full Professor lives in one of these homes). In short, there is nothing affordable about them and they no longer house younger faculty. (This breaks the argument for association in the document, which was tenuous to begin with).
- 9) Other sections of the report are equally confusing. For example, in the report the consultant defines “Character-defining features” of the Hoover cottages and then goes on to list features like “one story” and the use of stucco on the homes. Nearly every home on campus is one story and stucco is one of the most common building materials in California. Clearly, we cannot define the character of something by noting that it shares the attributes of nearly all surrounding homes. I would think character defining would be the \*distinctive\* features of the home. The other defining features of cottages suffer from similar issues. For example, almost every home on campus has “exposed rafters”. This is hardly character defining.
- 10) Similarly, homes that were built \*from building plans\* are being labeled as “historic”. The notion that buildings that are constructed from mail order construction plans are in need of some sort of historic protection is the kind of absurd protectionism someone might invent to lampoon the historical process.
- 11) “Archival review indicates that there are significant associations between the development of the Lower San Juan Neighborhood and the provision of accessible/affordable housing on the Stanford University campus for faculty and staff “ I just want to repeat that building homes at a price point does not constitute a historic event, as the consultant acknowledged at our meeting.
- 12) There are a series of evidence-free assertions in the report. In other places, there are plainly obvious assertions made that do not require an architectural expert to make (and have no bearing on the creation of a historic district). Specifically, I do not understand how the following paragraphs can justify the creation of a historic district or why a historic consultant was needed to reach these conclusions.
  - a. “Feeling – This and other Stanford neighborhoods and the Stanford University campus continue to exhibit the physical characteristics of a residential neighborhood adjacent to and associated

- with a university campus.” How do you establish the “feeling” of a neighborhood? What facts are used to distinguish the on campus neighborhoods from other neighborhoods that lack the feelings of a “residential neighborhood adjacent to and associated with a university campus”? It is true that the homes are adjacent to a university, but this fact alone doesn’t establish a “feeling”. I would appreciate a clear documentation of the sources used to make this declaration and the conclusion that “The Lower San Juan Neighborhood Historic District retains integrity of feeling.”
- b) “Association – The contributors to the proposed Lower San Juan Neighborhood Historic District continue to function as residences adjacent to and associated with a university campus.” This is redundant with feeling and equally vacuous. The law does not say that the creation of homes next to a university automatically makes them historic, nor is it clear why building homes next to a university would constitute a particularly historic event. It is true that these homes will be faculty residences--Stanford’s charter guarantees that. This is obviously not enough to trigger a historic district. The report goes on to assert that “They also continue to be more-affordable options than those residences to the south in the San Juan Hill Neighborhood”. This is demonstrably false. No one identifies these homes as affordable and the consultant provided no evidence for this assertion.
- 13) The use of sources in the report are extremely suspect. Essentially the report cites secondary sources exclusively. What’s more, this secondary sources is not peer reviewed. I fail to see how the use of unvalidated secondary sources can justify the creation of a historic district. In the meeting the consultant claims that she validated these sources with her own archival work. Yet, there are essentially no citations to this archival work. The consultant should provide evidence for the assertions made about the homes beyond what is found in non-peer reviewed secondary sources. If those citations are not forthcoming, the assertions should be removed from the report.

**Sapna Marfatia:**

*Survey Content / Report*

- The theme is unsupported:
  - Why is the provision of housing affordable to Stanford faculty (clearly not a low income or disadvantaged community) is a historically significant event or pattern of events?
  - How does relying on one source comply with historic assessment standards in the industry? (theme & significance both appear unsupported)
- When the County has used a peer reviewer for historic assessments, they have asked that all the referenced historical documents be cited within the DPR – will the same process and standards be applied to the ESA report?
- This is confusing and we ask that the county respond to these contradictions with more clarity:
  - P. 1-1 & 2-10 indicates Frenchman's Hill, Pine Hill I & II neighborhoods were dropped from consideration as potential historic districts and do not rise to the level of significance as a historic resource. Yet 189 properties in Appendix B, 111 properties in appendix C & 115 properties in appendix D have been identified where homeowners will have to "evaluate for individual eligibility." Essentially, is the county asking a total of 415 properties to go through a 3-step review process: HSA/peer review, HHC, BS for additions greater than 500sft?
  - Additionally, p. 2-8 highlights a contradiction in the survey outcome for Frenchman's hill: “If a historic district is identified here, all buildings and structures would need to be assessed as to whether they were contributors since the subdivision was planned prior to 1970.”

- The Lower San Juan District numbers are not adding up. The double house needs to be better explained. Which numbers are correct: 17/70 contributors (p. 4-1), 22 contributing with 1 non-contributing (Fig 3), OR 15 contributors as listed in the spreadsheet?
- The proposed district contains three building clusters with different, non-overlapping, periods of construction -- why are these lumped into one district instead of three? This is particularly important as you are finding these homes eligible for "events" and not based on their architectural merit.

*Review Processes:*

- Process Chart: The process chart identifies which permits are needed for a "property 50 years old or older" and a "property on the County Historic Resource Inventory." Under this second column, a LAP is required for four categories of "Small Projects," lines 12 - 15. SCC's Historic Preservation Ordinance, Sec. 17-3, Definitions, states that a "Landmark alteration permit means a permit approving an alteration to or demolition of a landmark, or demolition of a historic resource listed in the heritage resource inventory pursuant to the provisions of this chapter." This would only encompass lines 16 & 17 of the chart. Why is this new process more difficult than the County Ordinance? Partial demolitions do not require LAP elsewhere in the County.
  - As stated by staff only homes on the HRI seeking a full demolition require a LAP. This doesn't match the proposed process chart, where some small projects require a LAP. Can you please explain this more clearly?
  - Be more specific, what process will a homeowner with a recommendation to evaluate for individual eligibility have to follow prior to or concurrently with a request made a modification to their property? Will they be able to follow the permit process for "property 50 years old or older" since they aren't on the HRI, or will the County require the evaluation first to make that determination?
- Can you be more specific: will homes in Pine Hill I, II and Frenchman's have to go through any historic review process? The Permit Process flow charts indicate that, "The process primarily is for homes in the neighborhood shaded in blue," which is only San Juan Hill and lower San Juan. Please provide an unambiguous process for these neighborhoods.
- P. 2-6 states that the HRI will be reviewed every 5 years and revised if necessary, according to current preservation planning practice. The SCCO inventory was published in 1962 & updated in 2013, was it reviewed and/or revised every 5 years, is the county going to apply this countywide? Will you be changing the HHC procedures and work plan to reflect this new process? Will HHC continue to only meet 6xs a year, or will the County request additional monthly meetings if there is a queue of applications?
- Can you provide a more specific timeframe for and estimated cost for a homeowner who wants to complete a Small Project, and one who wants to do a major remodel?
- What outreach is the county going to provide to the homeowners who live in the homes within the district? Are you going to obtain homeowner approval to list the district?

**Pria Graves:**

My comments were not questions... but I did say that while I understood the rationale behind focusing on the creation of the Lower San Juan district, I remain concerned about erosion of the potential district(s) on the upper San Juan Hill if we rely only on the HSA/peer review process on individual houses. While not all individual houses may rise to the level of being considered historically significant, as a group, there are many parts of that neighborhood which deserve protection. It is clear from the report that Amber considers that there are several possible groupings.

Apropos of that, might it be possible to have ESA draft preliminary “possible” district(s) in that area? And could those be considered as a contributing factor if a major remodel/demolition request for a home in those “possible” districts is submitted?

I hope staff will also go back to the Board of Supervisors and request that further work toward developing districts be funded. Reviewing the genesis of the current process, it’s important to recall that it was initiated by the concerns of residents of the upper San Juan Hill regarding potential erosion of neighborhood character. That risk still exists.

**Grace Hinton:**

- 1) Comment: it was stated that the study will “streamline the permitting process.” The proposed process seems to have the potential to add several layers of complexity as well as cost.
- 2) Is the Period of Significance of “Lower San Juan” 1906-1929, as stated in the draft study, or 1935, a date mentioned in the presentation? Also please confirm the Period of Significance for the San Juan neighborhood as a whole (as opposed to the adjacent R1S Base Zoning neighborhoods).
- 3) Please clarify any difference in the permit process between a post-WWII era house in the greater “San Juan” neighborhood and a house of the same era in adjacent Stanford R1S Base Zoning neighborhoods. There are 30-40 houses built in the post-WWII era as infill within existing residential blocks in San Juan and at the edges of the boundary.
- 4) The County has withdrawn the 15 HSAs offered in the original brief. Given that the houses within the proposed historic district can incur considerable process costs, possibly \$30-\$40/SF or more, wouldn’t it be fairer to offer the sponsored HSAs to those houses, especially as they are being considered as representing efforts toward affordable housing?
- 5) What would Design Guidelines do that the guidelines for the SOI Standards would not? Which would take precedence if special guidelines were developed? Would guidelines be utilized in addition to the SOI Standards?
- 6) Are there other unincorporated SC County neighborhoods that have design guidelines?
- 7) I am assuming that the houses within the proposed Historic District would be listed on the County’s Historic Resources Inventory. Are these the only houses likely to be listed?
- 8) Questions regarding the residential areas adjacent to San Juan, classified as “R1S Base Zoning” (Pine Hill I & II, Frenchman’s Hill). What are the GUP/Historical rules for the other adjacent Stanford neighborhoods? Would a homeowner in the “R1S Base Zoning” area (Pine Hill I & II, Frenchman’s Hill) for example be required to obtain an HSA as well as a follow-up HSA for demolitions or larger projects as in San Juan? For Small Projects, will Stanford FSH be required to verify eligibility for Small Project category and supply a letter of compliance with the Standards?
- 9) Would you please add a section to your matrix for “50 Year Old Houses in Pine Hill I & II, Frenchman’s Hill”?
- 10) Please clarify differences in the permit processes between Stanford “R1S Base Zoning” area (Pine Hill I & II, Frenchman’s Hill) and other areas of unincorporated Santa Clara County.

**Debbie Sheppard:**

- 1) Without design guidelines, new construction after demolition can severely damage the context for a future historic district.
- 2) What is the process to place the 17 homes in Lower San Juan identified by ESA on the HRI?