3.8 CULTURAL RESOURCES

Introduction

This section of the EIR assesses the SUMC Project’s potential impacts on cultural and paleontological resources. The Northwest Information Center of the California Archaeological Inventory and Historical Resources Information System (at Sonoma State University) commonly classifies cultural resources in three categories: (1) prehistoric resources, (2) historical resources, and (3) Native American resources. In general, prehistoric or Native American resources can include archeological sites with evidence of village occupation, stone tool quarrying and manufacturing, and religious or ceremonial use (including cemeteries). Historical resources can include buildings, structures, objects, or sites. For example, historical homestead sites can include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits, often in old wells or privies. Paleontological resources include fossil remains, fossil localities, and formations that have produced fossil material. Paleontological resources are classified as non-renewable scientific resources that are protected by federal and State statutes, most notably by the 1906 Federal Antiquities Act. The Existing Conditions discussion in this section includes a brief historical perspective of the SUMC Sites and surrounding areas, a determination of cultural resource sensitivity within the SUMC Sites and surrounding areas, and applicable cultural resources policies and regulations for the SUMC Sites. This section concludes with a discussion of potential project impacts on cultural and paleontological resources and the appropriate mitigation measures to reduce potential impacts to less-than-significant levels. Potential impacts are assessed in accordance with the City’s impact significance criteria.

This section of the EIR is based primarily on the report titled Cultural Resources and the Stanford University Medical Center Facilities Renewal and Replacement Project, prepared by Stanford University. Other sources consulted for the preparation of this section include the cultural resources records search results for the SUMC Sites and surrounding areas prepared by the Northwest Information Center, the City of Palo Alto Comprehensive Plan, San Francisquito Creek Bank Stabilization and Revegetation Master Plan, the City of Palo Alto Master List of Historic Structures, Stanford University Medical Center Historic Resource Evaluation and Peer Review, Staff Comments on the Stanford University Medical Center: Historic Resource Evaluation and Peer Review California Archaeology, Existing Conditions Report: Stanford West Senior Housing, Sand Hill Road, Stanford Shopping Center, and geologic maps.

Cultural resource issues and comments identified in response letters to the NOP and during the Planning and Transportation Commission and City Council public scoping meetings for the SUMC Project were considered in preparing this analysis. Comments primarily pertained to impacts on Governor’s Lane, the Edward Durell Stone Building (also referred to as the Stone Building complex),

1 Jones, L., Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007.
and the Hoover Pavilion. These comments were received from the Palo Alto Planning and Transportation Commission. This analysis addresses the historic significance of these resources and the impacts of the SUMC Project on these resources.

**Existing Conditions**

The geologic units identified in the SUMC Sites and surrounding areas are part of a younger alluvial deposit found along the edge of the Santa Clara Valley, and consist of 12 to 15 feet of moderately well-sorted, unconsolidated, fine sandy silt to clayey silt overlying at least 6 feet of silty clay. Underlying this, the Santa Clara Formation is an older alluvium consisting of partially consolidated clay, silt, sand, and gravel deposited more than 11,000 years ago. Neither of these geologic units is considered sensitive for paleontological resources. Although the area is considered to have a low sensitivity based on the geologic units, previous construction activities in the SUMC Sites and surrounding areas have uncovered paleontological resources as well as a Pleistocene creek bed that is known to contain fossils. Paleontological resources that have been found in the area include a large mastodon tusk in the bank of San Francisquito Creek, the upper limb of a giant bison, and individual skeletal elements. In addition, one of the best-preserved and complete specimens of a Paleoparadoxia ("sea cow") outside of China was discovered near the SLAC National Laboratory to the west of the SUMC Sites.

**Surrounding Areas**

**Prehistory.** The SUMC Sites are within the San Francisco Bay Area region. A review of the extant archaeological record by Moratto shows no evidence of Paleo-Indian (pre-9000 B.C.) habitation in the region, though just to the north the record goes back much further in time. The earliest evidence in the region dates to the Late Archaic (4000 to 2000 B.C.). A Stanford University student found a skull eroding out of the bank of San Francisquito Creek in 1921, located 6.1 meters (approximately 20.1 feet) below the surface in primary context. Named the Stanford Man I, it was dated in 1974 to 3130 ± 70 B.C. In 1963, Stanford Man II, a flexed human burial, was discovered 1,150 meters (approximately 1,265 yards) downstream from Stanford Man I. It was dated to 2400 ± 70 B.C.

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4 Section 4.9 Historic and Archaeological Resources. *Stanford University Community Plan/General Use Permit EIR*, June 2000.
The Late Archaic was a time of great change throughout California, with prehistoric groups expanding their range of exploited environments and resources. In the San Francisco Bay region, the evidence gathered at sites along San Francisquito Creek, and other areas, point to a widespread but sparse population. Important technological innovations during the Archaic period in general, and the Late Archaic in particular, include the mortar and pestle (used for pounding nuts, acorns, and the carcasses of small animals), the milling stone and mano (primarily used for grinding hard seeds), and, very late during the Archaic, mortars and milling surfaces placed on bedrock (BRMs). Hunting and fishing was also very important as evidenced by the presence of pronged spears, nets, hooks, and traps. A variety of knives, projectile points (spear and dart points), and scrapers were also made. Most of these were made from local materials, but some were made from very distant source materials, likely evidence of long distance trade. Basketry was one of the most important innovations during the Archaic period, and California Indians are counted among the most skilled basket makers in the world. A few uses of baskets include cooking, serving, storing, and transport; some baskets were made so well they could hold water.

The ensuing period was a time of increasing use of varied resources and ecological niches. Throughout California, prehistoric groups were becoming more diverse as they increasingly adapted to their particular environments. In the San Francisco Bay region, it has been suggested that Ohlone peoples from eastern Contra Costa County settled the region during this time, replacing the previous group by 1500 B.C. The Ohlone would remain in place until historic times.

By 300 A.D., this group would adopt the bow and arrow, and develop other traits such as tubular tobacco pipes, cremation of the dead, intensive acorn utilization, and complicated exchange systems. It was this pattern that was destroyed by the Spanish Mission system.

**Ethnographic Setting.** At the time of European contact, the SUMC Sites and surrounding areas were occupied by a group of Native Americans referred to as the Costanoan or Ohlone. The Ohlone are a linguistically defined group composed of several autonomous tribes speaking eight different but related languages. The Ohlone languages, together with Miwok, comprise the Utian language family of the Penutian stock. The territory of the Ohlone people extended along the coast from San Francisco Bay in the north to just beyond Carmel in the south, and as much as 60 miles inland. This territory encompasses a lengthy coastline as well as several inland valleys. The Ohlone were hunter-gatherers and relied heavily on plants and seafood, as well as various seeds, buckeye, berries, roots, land and sea mammals, waterfowl, and shellfish.
Ohlone technology that aided in the procurement and processing of foodstuffs included tule balsas for watercraft, bow and arrow, cordage, bone tools, and twined basketry.

The Ohlone were politically organized by tribes, with each tribe having a designated territory. A tribe consisted of one or more villages and camps within a territory designated by physiographic features. The position of tribe chief was inherited patrilineally and could be occupied by a man or a woman. Duties of the chief included hosting visitors, directing ceremonial activities, and directing fishing, hunting, gathering, and warfare expeditions. The chief served as the leader of a council of elders, which functioned primarily in an advisory capacity to the community.

Seven Spanish missions were founded within the Ohlone territory between 1790 and 1797. While living within the mission system, the Ohlone commingled with other groups, including Esselen, Yokuts, Miwok, and Patwin. Mission life was detrimental to the Ohlone population. It has been estimated that in 1770, at the time the first mission was established in Ohlone territory, the population numbered around 10,000 individuals. The population declined to less than 2,000 by 1832 as a result of violence, starvation, slavery, disease, and reduced birth rates. After the secularization of the missions, Indian inhabitants of the missions gradually left, and many went to work as manual laborers on ranchos. There was a partial return to aboriginal religious practices and subsistence strategies, but Ohlone culture was dramatically transformed after European settlement in the region.12

**History.** Beginning in the mid-sixteenth century, Spanish explorers conducted a series of sea expeditions along the coast of California. It was not until 1769, however, that Europeans became aware of the existence of the San Francisco Bay. In 1769, Juan Manuel de Ayla, the first European to enter the San Francisco Bay, established a settlement along its shores. In 1776, Juan Bautista de Anza led the first overland expedition into San Francisco, where he founded the Presidio of San Francisco and Mission San Francisco de Asís.

The Spanish colonization of California was achieved through a program of military-civilian-religious conquest. Under this system, soldiers secured areas for settlement by suppressing Indian and foreign resistance and established fortified structures (presidios) from which the colony would be governed. Civilians established towns (pueblos) and stock-grazing operations (ranchos) that supported the settlement and provided products for export. The missionary component of the colonization strategy was led by Spanish priests, who were charged with converting Indians to Catholicism, introducing them to the benefits of Spanish culture, and disciplining them into a productive labor force. Ultimately, four presidios and 21 missions were established in Spanish California between 1769 and 1821. The mission trail became known as the El Camino Real, or King’s Highway, which today runs through Palo Alto and is just north of the Hoover Pavilion Site.

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In 1822, after more than a decade of revolutionary struggle, Mexico achieved independence from Spain, and California became a distant outpost of the Mexican Republic. Under a law adopted by the Mexican congress in 1833, the mission lands were to be subdivided into land grants, or ranchos, to be sold to trustworthy citizens. The rancho economy was based primarily on stock raising for the hide and tallow trade. Cattle were driven to coastal locations where they were slaughtered and skinned; the hides and tallow (a product made from animal fat and used to make soap and candles) were then processed for transport to awaiting trade ships.

The absence of effective governmental authority in Mexican California invited infiltration by outsiders. As early as the 1820s, British and American mountain men, fur traders, and entrepreneurs were venturing into California in search of fortune. The Mexican government was unable to halt the incursion and granted citizenship to foreigners who pledged to adhere to Mexican law. Many of the foreigners received generous land grants on which they established grazing and commercial operations. Beginning in the early 1840s, Mexico’s hold on California was further threatened by the steady overland migration of American settlers into the region. The increased American presence in California was a product of the expansionist impulse that had come to dominate the American imagination and which contributed to a deterioration of relations between Mexico and the United States. War between the U.S. and Mexico broke out in May 1846, but the U.S. eventually prevailed, and the American victory over Mexico was formalized in February 1848 with the Treaty of Guadalupe Hidalgo.

In January 1848, just a few days before the treaty was signed, James Marshall, an employee of John Sutter, discovered gold on the American River. Marshall’s discovery triggered the gold rush, a massive influx of fortune-seekers into California. The sudden and enormous growth of California’s population brought about by the gold rush resulted in a movement for statehood that culminated in the state constitutional convention at Monterey in 1849 and the establishment of California as a state in 1850.13

Though no significant gold mining activity took place in Santa Clara County, the gold rush led to an exodus of much the adult male population to the gold fields of the central Sierra mountain range. By 1852, the most accessible gold diggings had been exhausted, and most of the immigrants that had come to California in search of instant riches began to redirect their energies to agricultural and commercial development. During the two decades that followed the gold rush, California’s urban and agricultural infrastructure grew steadily as migration into the state continued. The City of Palo Alto in Santa Clara County was founded in 1892 and lies on the historic land grants Rancho Rincón de la San Francisquito, Rancho de la Arroyo de San Francisquito, and Rancho San Francisquito.

The SUMC Sites lie in a plain that was once oak woodland and grassland. The area is situated between the marshes of the San Francisco Bay and the foothills of the coastal range. The early landowners of the SUMC Sites and surrounding area were George and Elizabeth Gordon. Their home was located along the San Francisquito Creek. The family planted vineyards in the general vicinity of the Stanford

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Shopping Center. In 1876, Leland and Jane Stanford purchased 650 acres of the *Rancho San Francisquito* (the Gordon Estate), where Stanford built a country home and began developing his famous Palo Alto Stock Farm for trotting horses. In the 1880s, the vineyard was expanded and a winery was constructed. He later acquired several thousand more acres of property, on which he built Stanford University.\(^{14}\)

Located near the edge of the Stanford University campus, the SUMC Sites continued to be used for agricultural until the 1950s, when Stanford University decided to move its medical school from San Francisco to the Palo Alto campus. The new medical complex opened in 1959. A comprehensive history of the SUMC Sites and surrounding areas is provided in *Cultural Resources and the Stanford University Medical Center Facilities Renewal and Replacement Project*, which is available upon request from the City.

**Site Investigations.** The following investigations were conducted to assess occurrence of cultural resources within the SUMC Sites and surrounding areas.

**NWIC Records Search.** A records search was conducted by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS). The records search included a review of NWIC data maps, historic-period maps, and literature for Santa Clara County on file at the NWIC. The records searches for the SUMC Project were conducted on October 4, 2007 and January 10, 2008, at the NWIC. The records search failed to identify any recorded Native American or historic-period archaeological resources within the SUMC Sites.\(^{15,16}\) The NWIC has no record of any archaeological studies within the SUMC Sites; however, the Main SUMC Site is about 0.25 miles south of San Francisquito Creek, an area known to contain Native American cultural resources.

There were multiple studies associated with the Sand Hill Road Corridor Projects that included Quarry Road. The Draft EIR for the Stanford Sand Hill Road Corridor Projects analyzed projects that were located near the northern boundary of the City of Palo Alto, on the campus of Stanford University adjacent to San Francisquito Creek and the City of Menlo Park. Thirteen known prehistoric archaeological sites were identified within the projects’ boundaries. A reconnaissance-level survey was conducted by William Self Associates for the Stanford West Apartments Project, the Stanford West Senior Housing Project, and the Sand Hill Road Project. At the Stanford West Apartments, sparse artifacts, both prehistoric and historic, were observed throughout the area. At the Stanford West Senior Housing project, no prehistoric cultural resources were encountered during the reconnaissance survey; however, records indicate that three archaeological sites were recorded within or immediately adjacent to Stanford West Senior Housing along San Francisquito Creek. In addition, an historic stone

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\(^{15}\) Jillian E. Guldenbrein, Researcher, Northwest Information Center, Sonoma State University, letter to PBS&J, re: Rapid Response Records Search Results for the proposed Simon-Properties Stanford Shopping Center Expansion project (File No: 07-511A), October 4, 2007.

\(^{16}\) Jillian E. Guldenbrein, Researcher, Northwest Information Center, Sonoma State University, letter to PBS&J, re: Rapid Response Records Search Results for the proposed Stanford University Medical Center Facilities Renewal and Replacement project (File No: 07-511B), October 4, 2007.
monument and an historic landscape feature were recorded. Although three archaeological sites were identified within or in the Sand Hill Road Project Area no cultural resources were encountered during their survey of related roadways or of the Sand Hill Road Project. Given the proximity of San Francisquito Creek to the project, it was concluded that construction related to the Sand Hill Road Extension, Vineyard Lane, Stock Farm Road extension, Pasteur Drive realignment, and Stanford Golf Course modifications could encounter archaeological resources. It was determined that this would be a potentially significant impact. In addition, an archaeological deposit is known to exist in and near the Sand Hill Road bridge. It was determined that the proposed widening of the bridge would disturb these archaeological deposits, which was determined to be a significant impact.

The 1984 Willow Road Extension Draft Environmental Impact Report identified CA-SMa-33 as located on the southeast bank of San Francisquito Creek. The search also identified one previous survey along Willow Road. A reconnaissance-level survey was conducted; however, no cultural resources were encountered. Due to the presence of nearby buried archaeological resources, it was decided to perform subsurface testing, which consisted of 11 mechanically excavated trenches along the proposed Willow Road alignment. A single trench showed probable evidence of archaeological resources, yielding eight pieces of fire-cracked rock, baked clay, and charcoal.

The Willow Road Improvement Project Draft Environmental Impact Report analyzed the widening of Willow Road from the Sand Hill-Santa Cruz intersection to Arboretum Road and the extension of Willow Road from Arboretum Road to El Camino Real. Archaeologists examined areas outside and to the west of the current SUMC Sites. Dirt from rodent holes were examined at the Stanford golf course, and the area north of the golf course was surveyed. In addition, soil cores were taken from the golf course. A complete Monterey chert projectile point, two obsidian projectile point fragments, and disarticulated human remains were recovered. All of the soil cores contained varying amounts of cultural material, including waste flakes, shellfish, crab, and fire-affected rock.

Project Specific Investigations/Reports. Cultural resource reports prepared for the EIR included Cultural Resources and the Stanford University Medical Center Facilities Renewal and Replacement Project prepared by Stanford University in 2007 and Stanford University Medical Center Historic Resource Evaluation and Peer Review prepared by Architectural Resources Group, Inc. in 2008 (see Appendix I). The report prepared by Stanford University provides the history, setting, and evaluations of all potential historical resources within the SUMC Sites. This report was prepared by Laura Jones, Director of Heritage Services and University Archaeologist at Stanford University. The report prepared by ARG includes a peer review of the report prepared by Stanford University’s Director of Heritage Services and University Archaeologist Cultural Resource Specialist. A further discussion of historical resources within the SUMC Sites is provided later in this section.

Native American Consultation. The Native American Heritage Commission (NAHC) in Sacramento was contacted by PBS&J on October 9, 2007 by letter with a description of the SUMC Project and a request for a listing of local, interested Native American representatives and information on traditional or sacred lands within the SUMC Sites and surrounding area. The search performed by the NAHC of
the sacred land file did not identify the presence of recorded Native American sacred sites in the SUMC Sites. The NAHC also provided a list of Native American individuals/organizations that may have knowledge of cultural resources in the SUMC Sites. Letters that included a brief description of the SUMC Project and a project location map were sent to each individual/organization identified on the NAHC list, who are listed in Table 3.8-1. The NAHC requests that follow-up phone calls be made to these Native American individuals/organizations if they do not respond to the letters. Follow-up telephone calls were made by PBS&J on December 27, 2007. As shown in Table 3.8-1, Michelle Zimmer, Irene Zwierlein, and Ann Marie Sayers recommended that an archaeologist and Native American monitor earth-disturbing activities; the other Native American individuals/organizations could not be reached.

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<td>November 15, 2007, December 27, 2007</td>
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*Source: PBS&J, 2008.*

**Cultural Resource Sensitivity.** The NWIC records search revealed no recorded prehistoric or historic-period sites or features in the SUMC Sites. The NWIC concluded that there is a moderate to high likelihood that Native American cultural resources exist on a portion of the areas surrounding the SUMC Sites due to environmental conditions that may have been favorable to Native Americans. The search of the NAHC sacred lands database and Native American correspondence failed to indicate the presence of Native American resources in the immediate SUMC Sites. The NAHC indicated that the

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absence of specific site information in the sacred lands database or through correspondence with tribal representatives does not indicate the absence of cultural resources on the SUMC Sites.

Research has revealed that several important archaeological resources have been discovered along and in the banks of San Francisquito Creek, about 0.25 miles north of the Main SUMC Site. Many of these resources were discovered several feet below the surface. Surveys of the SUMC Sites and surrounding areas by Stanford University archaeologists have discovered several archaeological sites immediately adjacent to San Francisquito Creek. All of the documented prehistoric archaeological resources are restricted to the creek vicinity and a 300-foot area that extends away from the creek. In these areas there are dense archaeological remains, including village sites and burials. Outside of this zone, prehistoric cultural resources have not been encountered. The SUMC Sites are entirely outside of this archaeological zone.

**Paleontological Resources.** Although a review of the Geologic Map of California suggests that there is no fossil potential for the SUMC Sites, the Bay Area in general is rich in paleontological resources. A buried Pleistocene stream bed is under the Main SUMC Site. The stream bed has been encountered in at least three locations: the Lucas Center, the Neiman Marcus store, and the storm drain at Quarry Road near El Camino; however, the precise location of the stream bed is unknown. As previous construction activities have shown that this creek bed contains paleontological resources, the excavation of trenches that are at least 100 feet in length and 15 feet in depth could expose the buried Pleistocene-era stream channel and intact skeletons of extinct species. Other important finds recovered in the vicinity of the SUMC Sites include mastodon tusk, fragments of petrified mastodon and/or dinosaur bone, isolated fragments of bones from late Pleistocene mammals, and marine fossils. In addition, one of the best-preserved and complete specimens of a Paleoparadoxia (“sea cow”) outside of China was discovered near the SLAC National Laboratory to the west of the SUMC Sites. Given the presence of the buried Pleistocene stream in the vicinity of the SUMC Sites and the discovery of important finds recovered in or near the SUMC Sites, it is possible that paleontological resources would be encountered.

In summary, the findings indicate a high sensitivity for paleontological and historic archaeological cultural resources within the vicinity of the SUMC Sites, with a low sensitivity for archaeological cultural resources throughout most of the vicinity of the SUMC Sites.

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18 Laura Jones, Director, Heritage Services and University Archaeologist, personal communication, January 3, 2008.

19 Jennings, C. W., 1977, Geologic Map of California, 1:750,000, California Division of Mines and Geology, Sacramento.

20 One hundred feet or a sufficient length to support detailed hydrological study that could identify the Pleistocene-era stream channel

21 Jones, L. Director, Heritage Services and University Archaeologist, personal communication, January 3, 2008.
SUMC Sites

The following descriptions and significance assessments were taken from the historical resources reports prepared by Stanford University in 2007 and Architectural Resources Group, Inc. in 2009 (see Appendix I). Seven potential resources within the SUMC Sites were evaluated: Governor’s Avenue, Hoover Pavilion, Nurse’s Cottage at Hoover Pavilion, 701 Welch Road, 703 Welch Road, 1101 Welch Road, and the Stone Building complex (including the East, West, Core, Boswell, Grant, Alway, Lane, and Edwards buildings). Each of the buildings that are within the SUMC Sites is described briefly below. Each resource was evaluated using the standards for eligibility for listing on the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). Part of the evaluation process includes determining if the resource maintains integrity. The seven elements of integrity identified by the National Park Service include location, design, setting, materials, workmanship, feeling, and association.22

Governor’s Avenue. Governor’s Avenue (or Governor’s Lane) was a tree-lined drive originally planted by Governor Leland Stanford, Sr. between 1876 and 1878. The drive started at his carriage house, continued along San Francisquito Creek, and ended at the Palo Alto Stock Farm. The drive originally was lined with more than 700 Tasmanian blue gum eucalyptus trees. Intact portions of Governor’s Avenue are considered to be a significant historical resource. Within the boundary of the SUMC Sites, however, most of Governor’s Avenue is absent.

In evaluating Governor’s Avenue, Stanford University’s Director of Heritage Services and University Archaeologist considered if the resource is eligible for listing on the CRHR, under criteria 1, 2, or 3 (see Applicable Plans and Regulations later in this section for the CRHR criteria). Stanford University’s Director of Heritage Services and University Archaeologist concluded that the resource does not appear eligible for listing under criterion 1 for association with events at the Palo Alto Stock Farm. In addition, while the resource is associated with Leland Stanford, the resource is not representative of his many achievements as governor, railroad magnate, and philanthropist. Finally, Stanford University’s Director of Heritage Services and University Archaeologist evaluated the resource as a fine example of a type of designed landscape. It was determined that the resource exhibits most of the characteristic features of 19th century avenues: evenly spaced trees of similar size and type, a consistent roadway width, and strong straight lines. It was also determined the intact portions of the avenue retain integrity, and Governor’s Avenue appears to be eligible for listing on the CRHR under criterion 3.23

Two segments of Governor’s Avenue run within the Main SUMC Site, west of Pasteur Drive and adjacent to Welch Road. ARG agreed that some segments of Governor’s Avenue may have historic significance; however, ARG found that the segments in the Main SUMC Site does not retain sufficient integrity to be a contributing part of this resource. While the integrity of location has been retained,

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23 Jones, L., Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007.
other original aspects of the Avenue, including the design, setting, materials, workmanship, and feeling of the resource, have been lost. ARG concluded that the segments of Governor’s Avenue within the Main SUMC Site would not be eligible for listing in the CRHR or NRHP.24

In reviewing Stanford University’s and ARG’s evaluations, the City of Palo Alto’s Historic Preservation Planner concurred with the finding that Governor’s Avenue does not meet the criteria for listing on the CRHR.25 Therefore, within the SUMC Sites, the Governor’s Avenue resource is not considered to be an historical resource for purposes of the City’s CEQA analysis.

**Hoover Pavilion.** The Hoover Pavilion, along Quarry Road near El Camino Real, was constructed in 1930 to house the Palo Alto Hospital. Additions to the hospital were completed in 1939. The building is L-shaped in plan with a five-story central block, six-story tower, and four-story wings. It is Art Deco in style, which is represented in the ziggurat form, vertical emphasis of window bays, and stylized floral and geometric terra cotta panels and fixtures.

Stanford University’s Director of Heritage Services and University Archaeologist evaluated the Hoover Pavilion for listing on the CRHR. It was concluded that the Hoover Pavilion is not associated with significant events or persons, and therefore is not recommended eligible for the CRHR under criteria 1 or 2. However, it was concluded that the building is recommended eligible for listing under criterion 3 as an important example of pre-World War II hospital design. The building was considered a high-rise at the time of its construction. Its ziggurat roofline is strongly associated with art deco. The Hoover Pavilion may be the only ziggurat profile building in Palo Alto, and is one of a few examples of art deco structures in the City. In regards to the resource’s integrity, the Stanford University report stated that although decades of interior remodeling have compromised the feeling of being inside an historic hospital, the exterior art deco features and original building materials are intact, and convey a fairly high level of integrity. The Hoover Pavilion meets the condition of criterion 3 as exemplifying the distinctive characteristics of a pre-World War II hospital and appears to maintain sufficient integrity for listing on the CRHR.26

ARG concurred with Stanford’s conclusion that the Hoover Pavilion appears eligible for listing on the CRHR under criterion 3. ARG also stated that an evaluation of the Hoover Pavilion conducted by Dames and Moore found the resource to be eligible for the NRHP under criteria A and C.27

The City of Palo Alto’s Historic Preservation Planner concurs with Stanford University’s and ARG’s evaluations of the Hoover Pavilion. In addition, although the art deco fountain near the main Hoover

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26 Jones, L., Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007.
Pavilion entry does not appear in photographs or plans from the 1930 or 1939 construction, the City of Palo Alto’s Historic Preservation Planner finds the fountain, which can be seen in an aerial photograph of 1947, to be a significant related landscape feature. Therefore, the Hoover Pavilion is considered to be an historical resource for purposes of the City’s CEQA analysis.

**Nurses’ Cottage at the Hoover Pavilion.** The Nurses’ Cottage is a multiple-level building with an irregular footprint. Palo Alto architects Birge Clark and David Clark designed the building in 1941. Birge Clark and Walter Stromquist designed the 1948 addition to the building.

The Stanford University report concluded that the Nurses’ Cottage is not associated with any significant historic events, and that none of the former occupants achieved notoriety. Lucie Stern, a well-known local philanthropist financed the construction of the cottage. Mrs. Stern contributed to the construction of other, better known properties in Palo Alto. The Nurses’ Cottage does not have a strong association with Mrs. Stern, nor is it one of her major contributions to Palo Alto and Stanford. Therefore, it does not appear to be eligible for the CRHR under criteria 1 or 2. The Nurses’ Cottage was designed by Palo Alto architects Birge Clark and David Clark in 1941. The property is a modest building, and is not an example of Clark’s well-known Spanish colonial revival style that characterizes many of his other projects in Palo Alto. Therefore, the Nurses’ Cottage does not appear eligible for the CRHR under criterion 3, and does not appear to be a significant historical resource. The Stanford University report did not evaluate the integrity of the Nurses’ Cottage, since the building is not considered eligible for the CRHR. Based on the information presented in the Stanford University report, ARG concurred with Stanford University’s findings and recommendation.

The City of Palo Alto’s Historic Preservation Planner concurs with Stanford’s and ARG’s evaluations, stating that the general style of the building appears too understated to meet the eligibility criteria for listing on the CRHR. Therefore, it is not considered to be an historical resource for purposes of CEQA analysis.

**701 Welch Road, Whelan Building.** This complex consists of five buildings – four of which were built between 1957 through 1961. An elevator tower was built in this complex in 1998. The four original buildings were designed by architect Don Knorr and range from one to three stories and form a “U” shape around a sunken central courtyard. The buildings’ architectural elements are typical of

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the International Style and consist of the flat roof, use of glass and steel, skeleton-frame construction, and lack of nonessential decoration.

Stanford University’s Director of Heritage Services and University Archaeologist concluded that there are no historical events associated with the buildings that would make the structures eligible for listing on the CRHR under criterion 1. Four of the buildings were designed by San Francisco Bay Area modernist architect, Don Knorr. The buildings are neither among his best known examples, nor are they good examples of Modern-era style. In addition, there have been major modifications to the buildings since their completion in 1961. It was concluded that the buildings do not appear to meet any of the criteria for listing on the CRHR. Substantial alterations to the buildings have compromised their integrity. Based on a site inspection, and information and photographs provided by Stanford, ARG concurred that the property does not appear eligible for listing on the CRHR. The City of Palo Alto’s Historic Preservation Planner concurs with Stanford University’s and ARG’s evaluations, and believes that the structures do not merit listing on the CRHR. Therefore, it is not considered to be an historical resource for purposes of CEQA analysis.

**703 Welch Road, Welch Road Professional Center.** The Welch Road Professional Center is a two-story, H-shaped building with one-story connecting elements at the north and south ends. Developer J.P. Aced completed the buildings first phase in 1958. The second story was an addition in 1963. The 1963 addition was designed by architect Bill Davies and landscape designer Doug Baylis. The original design has been compromised by the 1963 addition as well as by subsequent alterations.

Stanford University’s Director of Heritage Services and University Archaeologist concluded that none of the tenants at the Welch Road Professional Center could be considered important to the local history, and that no significant events occurred at the property. Therefore, the property is not recommended eligible for listing on the CRHR under criteria 1 or 2. The building features a modern design, but is not an excellent example of the Modern-era style. Portions of the building have been redesigned and altered, and doors and windows have been replaced, compromising the building’s integrity. It was concluded that the building at 703 Welch Road does not appear to be eligible for listing on the CRHR.

ARG conducted a site inspection and reviewed information derived from the Stanford report. ARG concurred with the Stanford report’s findings, stating that the Welch Road Professional Center lacks historic integrity and that it does not meet any of the CRHR criteria for listing; therefore it is not

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considered to be an historical resource under CEQA. The City of Palo Alto’s Historic Preservation Planner agrees with Stanford University’s and ARG’s findings.

1101 Welch Road, Medical Plaza. The Medical Plaza consists of three one-story buildings surrounded by parking lots, screening fences, and landscaping. There is a small courtyard between two of the buildings. The buildings were designed by William Wurster, and the grounds by landscape architect Lawrence Halprin.

The Stanford University report states that the medical offices and pharmacy on the property are not identified with any notable historic events or notable people. While the buildings were designed by a prominent architect, the buildings are a relatively late design. The buildings are common suburban professional office buildings. At the time of construction, giant eucalyptus trees along Governor’s Avenue crossed the property, but have since been removed. It was concluded that the buildings’ exteriors have retained integrity; however, the interiors have been updated and the landscaping has lost its integrity and therefore 1101 Welch Road does not appear eligible for listing on the CRHR.

Based on a site inspection and a review of information provided in the Stanford report, ARG concurred with Stanford University’s findings. ARG stated that the property is not associated with significant events or persons, is not a notable example of William Wurster’s or Lawrence Halprin’s work, and does not appear to be eligible for the CRHR. The City of Palo Alto’s Historic Preservation Planner concurs with Stanford University’s and ARG’s conclusions that the buildings do not appear eligible for the CRHR. Therefore, it is not considered to be an historical resource for purposes of CEQA analysis.

Stone Building Complex. The Stone Building complex (also referred to as the 1959 Hospital Building complex) (including the East, West, Core, Boswell, Grant, Alway, Lane, and Edwards buildings), constructed in 1959 and 1963, is a large three-story building with two wings projecting from the main block to form a forecourt with a central fountain. Interior courtyards are located throughout the building complex. Originally the joint Palo Alto-Stanford Hospital and Stanford University Medical School, the building complex was designed by Edward Durell Stone and the landscaping was designed by Thomas Church.

36 Jones, L., Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007.
38 Jones, L., Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007.
Stanford University’s Director of Heritage Services and University Archaeologist evaluated the Stone Building complex in 2007 as part of the SUMC Project Application. The evaluation concluded that the complex is not one of Stone’s major achievements and is probably not eligible for listing on the CRHR.\textsuperscript{41} In 2008, ARG, a firm that meets the Secretary of the Interior’s Standards for Architectural History, performed, on behalf of the City of Palo Alto, an evaluation of the Stone Building complex which included a peer review of Stanford University’s evaluation. ARG evaluated the Stone Building complex in relation to the eligibility criteria of the CRHR and the seven aspects of integrity defined in National Register Bulletin 15. ARG noted that Stone designed the Stanford University Medical Center/Palo Alto Hospital during a pivotal and innovative phase of his career; that it remains in its original location with its essential physical features intact; that although the setting has been altered, it is not significantly diminished; that the character-defining materials and workmanship are largely intact; and that the original feeling of the building is intact. In addition, both Stanford University and ARG noted that the complex is associated with an important historic event: the first heart transplant in the U.S. As a result, ARG concluded that the Stone Building complex appears eligible for listing on the CRHR and should be considered an historical resource for purposes of the City’s CEQA review (see Appendix I).\textsuperscript{42}

The City of Palo Alto’s Historic Preservation Planner reviewed the evaluations of ARG and Dr. Jones of Stanford University. The City’s Historic Preservation Planner concurred with ARG that although there have been some alterations to the complex’s courtyards and the surrounding setting; the complex as a whole is largely intact and conveys the original design intent. In addition, the main entry facades and several architectural elements retain a high degree of integrity and convey an expression of Stone’s work during an important phase of his career. The City’s Historic Preservation Planner also agrees that enough time has passed to understand the significance of the heart transplant that occurred at the hospital, and that the building retains sufficient integrity for association with that time period. Therefore, the City’s Historic Preservation Planner concurred with ARG that the Stone Building complex appears eligible for listing on the CRHR and therefore is an historical resource pursuant to CEQA.\textsuperscript{43}

**Applicable Plans and Regulations**

**Federal Regulations**

The National Historic Preservation Act of 1966 (NHPA), as amended, established the NRHP, which contains an inventory of the nation’s significant prehistoric and historic properties. Under 36 CFR 60,
properties are recommended for possible inclusion on the NRHP if the property is at least 50 years old,\textsuperscript{44} has integrity, and meets one of the following criteria:

A. Is associated with significant events in history, or broad patterns of events;

B. Is associated with significant people in the past;

C. Embodies the distinctive characteristics of an architectural type, period, or method of construction, or is the work of a master, or possesses high artistic value, or that represents a significant and distinguishable entity whose components may lack individual distinction; and/or

D. Has yielded, or may yield, information important in history or prehistory.

Certain types of resources are usually excluded from consideration for listing in the NRHP, but can be considered if they meet special requirements in addition to meeting one of the above criteria. Such resources include religious sites, relocated structures, graves and cemeteries, reconstructed structures, commemorative structures, and structures that have achieved significance within the past fifty years. A resource that meets the NRHP criteria is typically considered a historical resource for purposes of CEQA evaluations. However, a resource that does not meet the NRHP standards may still be considered a historical resource if: it meets the state criteria for listing; it is included on a local register of historical resources; or it has been identified as significant in an historical resource survey meeting statutorily defined requirements.

**State Regulations**

As defined by Section 15064.5(a)(1) of the State CEQA Guidelines, a resource shall be considered historically significant if it has been listed on the CRHR, or if the State Historical Resources Commission has determined that the resource meets the criteria for listing. However, a resource need not be listed on any register to be found historically significant for CEQA purposes (Public Resources Code Section 21084.1). Guidelines Section 15064.5(a)(3) explains that a resource may be determined by the lead agency to be an historical resource if the agency’s determination is supported by substantial evidence: “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...” Therefore, for purposes of this analysis, the City has applied the CRHR criteria to evaluate whether buildings, structures, or landscape features within the SUMC Sites are historically significant.

Given that the CRHR was modeled after the NRHP, its eligibility criteria are very similar to the eligibility criteria of the NRHP except that the CRHR criteria also contain references to resources that reflect the history of California. Another consideration for eligibility for the CRHR is that sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty (50) years old or older may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.\textsuperscript{45} Generally, to be eligible for listing on the CRHR (and therefore considered a historical

\textsuperscript{44} Criteria for inclusion under the California Register of Historic Resources are essentially the same as for the NRHP, except buildings 45 years old or older may qualify as historic resources.

\textsuperscript{45} California Code of Regulations Section 4852(d)(2).
resource under CEQA), a resource must possess integrity and demonstrate eligibility under at least one of the following criteria:

A. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
B. Is associated with the lives of persons important in our past;
C. 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
D. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Section 15064.5(c) of the State CEQA Guidelines applies to the analysis of effects on archaeological sites. When a project would affect an archaeological site, a lead agency must determine whether the site is an historical resource, and therefore subject to the CRHR criteria listed above (particularly Criterion 4), or whether the site is a unique archaeological resource, as defined in Section 21083.2 of CEQA, and whether the provisions of that section for mitigation apply. If a lead agency determines that an archaeological site is neither historic nor unique, the resource requires no further consideration, other than recordation of its existence if the lead agency so elects.

The State Historical Resources Commission (SHRC) is responsible for reviewing, commenting, and approving nominations to the NRHP, CRHR, California Historical Landmarks, and California Points of Historical Interest. As California’s review board, the SHRC responsibilities include reviewing NRHP nominations and deciding if a nomination meets the eligibility criteria prior to its submission to the Keeper of the Register at the National Park Service. Approval by the SHRC is a recommendation to the State Historic Preservation Officer to forward the nomination for final approval by the Keeper of the Register. According to federal regulations, a property cannot be listed on the NRHP if the owner objects to the listing. If the owner objects, a property can, however, be determined eligible for listing by the Keeper of the Register. Those resources that the Keeper of the Register approves for listing or determines eligible for listing are automatically listed on the CRHR. Properties recommended and approved for listing by the SHRC as California State Historical Landmarks and California State Points of Historical Interest are also automatically listed on the CRHR.

Local Regulations

The City of Palo Alto’s Historic Preservation Ordinance was adopted in 1980 and expanded to its current form in 1986. According to Section 16.49.010 of the Municipal Code, the purpose of the ordinance is to provide “recognition, protection, enhancement, and use of historically significant resources located within the City that are of great cultural, aesthetic, and economic benefit to the community.” The ordinance covers over 450 historic properties that are listed on the Palo Alto Historic Inventory or are also on the NRHP. None of the buildings in the SUMC Sites are listed on the City of Palo Alto Master List of Structures on the Historic Inventory.\(^\text{46}\)

Impacts and Mitigation Measures

Standards of Significance

Based on significance thresholds determined by the City of Palo Alto, the SUMC Project would result in a significant cultural resource impact if it would:

- Cause a substantial adverse effect (as defined in CEQA Guidelines section 15064.5(b)) on an historical resource listed or eligible for listing on the National and/or California Register, or listed on the City’s Historic Inventory;
- Eliminate important examples of major periods of California history or prehistory;
- Cause damage to an historic or unique archaeological resource as defined in Section 15064.5 of the CEQA Guidelines;
- Disturb Native American human remains, including those interred outside of formal cemeteries;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Directly or indirectly destroy a local cultural resource that is recognized by City Council resolution.

Environmental Analysis

CR-1. Impacts on Historical Resources. The SUMC Project would have a significant impact on historical resources. (S)

Demolition and Construction Impacts. The SUMC Project would involve the demolition of several buildings at both the Main SUMC Site and the Hoover Pavilion Site (see Figure 2-5 in Section 2 of this document). Buildings to be demolished include the sheds and storage buildings that are located at the Hoover Pavilion Site, just south of Hoover Pavilion; the SHC portion of the Stone Building complex (the East, West, Core, and Boswell Buildings); the 1973 Core Expansion Building; Parking Structure 3; the buildings at 1101 Welch Road, 703 Welch Road, 701 Welch Road; and the SHC portion of the Stone Building complex (the Grant, Alway, Lane, and Edwards Buildings). The Stone Building complex is the only structure to be demolished that appears eligible for listing on the CRHR (as described under Existing Conditions in this section) and is, therefore, considered by the City’s Historic Preservation Planner, in concurrence with ARG, to be a significant historic resource. The demolition of the Stone Building complex would result in a significant impact on an historical resource.

Construction activities at the Hoover Pavilion Site include demolition, excavation, trenching, soil compaction, site grading, renovation of the existing Hoover Pavilion, and the addition of new structures. Vibration from construction activities in the vicinity of Hoover Pavilion, and accidents to the building from construction debris or equipment associated with nearby
construction would have the potential to cause damage to sensitive architectural features on the Hoover Pavilion, which is an historical resource. The structures to be demolished include small sheds and storage facilities (including the Nurse’s Cottage described under Existing Conditions in this section) that are roughly as close as 20 feet from the Hoover Pavilion. Demolition work also would include a second-floor walkway that extends from the Hoover Pavilion building to the Nurse’s Cottage, and a loading dock attached to the Hoover Pavilion. The medical office building would be located as close as 50 feet from the Hoover Pavilion. The project application indicates that heavy-duty equipment such as excavators, drill rig, concrete mixers, and pump trucks would be used during the demolition of existing sheds, foundations, and below grade work. The geotechnical reports for the Hoover Pavilion Site did not recommend pile driving, since the underlying geologic units can safely support shallow foundations. As such, no vibration from pile-driving is expected.

Without mitigation, vibrations caused by construction activities can result in various levels of damage to historic buildings ranging from cosmetic to structural. Most demolition of on-site structures would occur at roughly 20 feet from the Hoover Pavilion, and construction of the medical office structures would occur at roughly 50 feet from the Hoover Pavilion. At 25 feet, heavy-duty construction equipment such as a large bulldozer would produce vibration levels of approximately 0.089 peak particle velocity (PPV) inches/second. The standard threshold for a building such as the historic Hoover Pavilion is 0.12 PPV; this level would be reached at approximately 20 feet. Therefore, vibration from most of the construction at the Hoover Pavilion Site is below the threshold and no damage to the historic Hoover Pavilion is expected. However, the demolition of the small sheds and storage facilities (including the bridge to the Nurse’s Cottage and the loading dock attached to the building) would occur within 20 feet of the historic Hoover Pavilion and could cause significant damage to architectural features. These activities would not cause structural damage to the Hoover Pavilion.

The architectural features that could be adversely affected include the terracotta panels located over windows on the portions of the Hoover Pavilion that would be within 20 feet of the area in which buildings would be demolished or heavy equipment movement would occur. In addition, the stucco sides of the building within 20 feet of such areas could be damaged by falling debris or accidents associated with construction equipment movement.

**Impacts from Interior and Exterior Renovation of the Hoover Pavilion.** In addition to the proposed demolition and construction, SHC plans to renovate the existing five-story concrete Hoover Pavilion structure for use as a medical office and clinic building while preserving and

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47 Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 8.
enhancing the historic art deco character of the building exterior. The building is currently
used for clinics and would continue to be used for this purpose. Medical offices would be an
additional use after renovation. The fourth floor of the Hoover Pavilion (approximately 6,000
square feet) would be dedicated to utilities and mechanical equipment. SHC anticipates that
approximately one-half of the remaining space would be used and occupied by community
practitioners, and one-half would be used and occupied by SHC. Presently, SHC uses Hoover
Pavilion for some of its primary care clinic services. SHC anticipates continuing this use, and
relocating its other primary care clinics from the Blake-Wilbur clinic building to the Hoover
Pavilion.

The interior of the Hoover Pavilion building has been repeatedly remodeled since its original
construction in the 1930s; there are no significant interior spaces that remain intact from that
period, and there are only a few remnants of interior historic materials and finishes left. The
renovation would require substantial interior demolition and reconstruction to meet building
code requirements and support modern medical office and clinic use. As part of the SUMC
Project, an inventory of the few surviving historic elements in the interior, such as light
fixtures and ventilation grilles, and some stair railings, would be prepared. These elements
would be reused where allowed by building codes and where compatible with the new uses of
the building.

The SUMC Project’s preservation focus for the Hoover Pavilion is to restore the exterior of the
building so that its unique art deco character can be enhanced and appreciated. Exterior
demolition would be limited to removal of additions made after the main building was
completed in 1939, including the second-floor walkway to the Nurse’s Cottage and loading
dock, and alterations to support Americans with Disabilities Act (ADA) access and life safety
as required by code (with reference to the accessibility provisions of the 2007 California
Historical Building Code). The historic character of the building’s exterior would be enhanced
by removal of air conditioning units in window and door openings, and consolidation of
rooftop mechanical equipment. The distinctive art deco terracotta panels and screens, bronze
panels, and light fixtures would also be preserved and restored by the SUMC Project. The
building’s historic character-defining windows would be retained and restored. A proposal to
replace existing historic windows would require review under the Secretary of the Interior’s
Standards for Rehabilitation of Historic Properties and approval by the City of Palo Alto.\(^{50}\)

Because no significant interior spaces remain intact from the period of significance, interior
renovations to Hoover Pavilion would have a less-than-significant impact on the historic
integrity of the Hoover Pavilion. Exterior modifications would retain significant character-
defining features (e.g. retaining and restoring historic windows) and eliminate non-historic
elements (e.g. removal of window air conditioning units); therefore, would have a less-than-
significant impact on the historic integrity of the Hoover Pavilion. The proposed Medical
Office Building and parking structure would be in close proximity to the Hoover Pavilion;

\(^{50}\) Catherine Palter, Associate Director, Land Use and Environmental Planning, Stanford University.
however, significant view would be retained and many non-historic buildings are in the surrounding area. And therefore, the changes to the surrounding setting resulting from these two new buildings would not result in an adverse, material alteration of significant characteristics and would result in a less-than-significant impact.

**MITIGATION MEASURES.** Implementation of the Mitigation Measures CR-1.1 and CR-1.5 would reduce potential vibration and construction-related impacts to the Hoover Pavilion resulting from demolition of adjacent sheds and storage facilities, impacts from falling construction debris, and impacts from movement of heavy equipment to a less-than-significant level. Implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce impacts due to the loss of the Stone Building complex; however, the impact would remain significant and unavoidable. Mitigation Measure CR-1.5 requires implementation of the Stanford Hoover Pavilion Protection Documents (Documents) prepared by ARG and dated September 21, 2009 (see Appendix J). These Documents provide specifications for the treatment and protection of the Hoover Pavilion during SUMC Project construction activities that could damage the historic fabric of the building including the installation of protective covering of certain exterior surfaces and the removal, cataloging, and storage of selective historic elements. The Documents are based on National Park Service and National Fire Protection Agency protection guidelines and include details on materials and methods of installation for the protective coverings to prevent damage from nearby demolition. Proper installation, as required in the Documents would prevent the protective covering itself from damage the building. The removal of historic elements would ensure their protection of some of the more fragile elements from construction activities and property cataloging and storage of such elements would ensure their proper care and reinstallation. The Documents include such details as specifying under what weather conditions it is acceptable to perform the various tasks that could be negatively impacted by different weather conditions. Any variations on the specifications of the Documents would not be allowed without prior consultation with ARG, or a qualified preservation architect. Refer to Appendix J, Stanford Hoover Pavilion Protection Documents, for a complete list of specifications for the Hoover Pavilion.\(^5\)

**CR-1.1 Manually Demolish Structures at the Hoover Pavilion Site.** Where feasible, the project sponsors shall establish a perimeter of construction fencing around the Hoover Pavilion at a minimum of 25 feet to establish a protective buffer around the building. The demolition of these sheds and storage facilities shall be accomplished manually without the use of vibration causing equipment. Additional protective fencing at a height sufficient to prevent any debris from hitting the building shall also be installed between the Hoover Pavilion and demolition activities occurring within the 25 foot buffer.

**CR-1.2 Prepare HABS Documentation for the Stone Building Complex.** The SUMC Project sponsors shall prepare HABS-like documentation using the National Park

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Services’ Historic American Building Surveys Level III guidelines for each of the buildings in the Stone Building complex prior to demolition of each building that comprises this historic resource (East, West, Core, Boswell, Edwards, Lane, Alway, and Grant). HABS-like recordation shall not be required until each of the individual buildings is vacated and prepared for demolition. The documentation shall include written and photographic documentation of each of the historic structures within the Stone Building complex. The documentation shall be prepared by a qualified professional meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History or History.

The documentation shall be prepared based on the National Park Services’ HABS standards and include, at a minimum, the following:

- Site-specific history and appropriate contextual information regarding the Stone Building complex. This history shall focus on the reasons for the buildings’ significance: heart transplantation program and the role of E.D. Stone in the design of the complex.
- Accurate mapping of all buildings that are included in the Stone Building complex, scaled to indicate size and proportion of the buildings to surrounding buildings; if existing plans accurately reflect these relationships these may be reformatted for submittal per HABS guidelines for CAD submittals.
- Architectural descriptions of the major exterior features and public rooms within the Stone Building complex as well as descriptions of typical patient, office, laboratory, and operating rooms.
- Photographic documentation of the interior and exterior of the Stone Building complex and Thomas Church-designed landscape features. Either HABS standard large format or digital photography may be used. If digital photography is used, the ink and paper combinations for printing photographs must be in compliance with National Register-National Historic Landmark photo expansion policy and have a permanency rating of approximately 115 years. Digital photographs will be taken as uncompressed .TIF file format. The size of each image shall be 1600x1200 pixels at 300 ppi (pixels per inch) or larger, color format, and printed in black and white. The file name for each electronic image shall correspond with the Index to Photographs and photograph label.

**CR-1.3 Distribute Written and Photographic Documentation to Agencies.** The written and photographic documentation of historic resources shall be disseminated on archival-quality paper to Stanford University, the Northwest Information Center, and other local repositories identified by the City of Palo Alto.

**CR-1.4 Prepare Permanent Interpretive Displays/Signage/Plaques.** The SUMC Project sponsors shall install interpretive displays within the SUMC Sites that provide
information to visitors and residents regarding the history of the Stone Building complex. These displays shall be installed in highly visible public areas such as the property’s open space or in public areas on the interiors of buildings. The displays shall include historical data and photographs as well as physical remnants of architectural elements. Interpretive displays and the signage/plaques installed on the property shall be sufficiently durable to withstand typical Palo Alto weather conditions for at least five years. Displays and signage/plaques shall be lighted, installed at pedestrian-friendly locations, and be of adequate size to attract the interested pedestrian. Maintenance of displays and signage/plaques shall be included in the maintenance program on the property. Location and materials for the interpretative displays shall be subject to review by the Palo Alto Architectural Review Board and approval by the Planning Director.

**CR-1.5 Implement Protection Documents for the Hoover Pavilion.** The SUMC Project sponsors shall ensure the implementation of the Stanford Hoover Pavilion Protection Documents (Documents) prepared by ARG and dated September 21, 2009. The SUMC Project sponsors shall comply with the specifications for the treatment and protection of the Hoover Pavilion during SUMC Project construction activities that could damage the historic fabric of the building as provided in the Documents.

**CR-2. Impacts on Prehistoric or Archaeological Resources.** The SUMC Project could potentially encounter archaeological resources and result in a significant impact. (S)

All documented prehistoric archaeological resources are restricted to the creek vicinity and a 300-foot area that extends away from San Francisquito Creek. In these areas, there are dense archaeological remains, including village sites and burials.\(^52\) Outside of this zone, prehistoric cultural resources have not been encountered. The SUMC Project would involve ground-disturbing activities. Although the SUMC Project is not likely to affect Native American or historic-period archaeological resources since the SUMC Sites are entirely outside of this archaeological zone, there is the possibility that archaeological resources could be encountered outside of the archaeological zone. This could be a significant impact. The SUMC Project sponsors would be required to implement Mitigation Measure CR-2.1 in the event unknown archaeological resources are discovered during construction.

**Mitigation Measure.** Mitigation Measure CR-2.1 provides discovery and evaluation procedures for any previously unknown archaeological resources on the SUMC Sites and requires that a professional archaeologist employ preservation in place, data recovery, or other methods that meet the Secretary of the Interior’s Standards for Archaeological Documentation to reduce impacts on unique archaeological resources. Therefore, implementation of the following mitigation measure would ensure the impact remains less than significant. (LTS)

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\(^{52}\) Laura Jones, Director, Heritage Services and University Archaeologist, personal communication, January 3, 2008.
CR-2.1 Construction Staff Training and Consultation. Prior to any construction or earth-disturbing activities, a qualified archaeologist shall inform construction supervisors of the potential to encounter cultural resources. All construction personnel shall be instructed to be observant for prehistoric and historic-era artifacts, subsurface archaeological features or deposits, including accumulations of dark, friable soil (“midden”), stone artifacts, animal bone, and shell. In the event that any prehistoric or historic subsurface archaeological features or cultural deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City shall be notified. The City shall consult with the Stanford University Archeologist to assess the significance of the find. If the find is determined to be an historical resource or a unique archaeological resource as defined by CEQA, then representatives of the City and the Stanford University Archaeologist shall meet to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report shall be prepared by the qualified archaeologist according to current professional standards.

CR-3. Impacts on Human Remains. The SUMC Project could potentially encounter human remains and result in a significant impact. (S)

No human remains have been encountered within the boundaries of the SUMC Sites. Native American burials, however, are commonly found in the vicinity of the SUMC Sites along San Francisquito Creek. The Main SUMC Site is located about 0.25 miles south of the creek and the Hoover Pavilion Site is about 1,500 feet south of the creek. It is unlikely but possible that human remains could be encountered during ground-disturbing activities. This impact could be significant. Human burials apart from being potential archaeological resources have specific provisions for treatment in Section 5097 of the California PRC and Sections 7050.5, 7051, and 7054 of the California Health and Safety Code. If unanticipated human remains were discovered during construction, the SUMC Project sponsors would be required to comply with those regulations.

MITIGATION MEASURE. Mitigation Measure CR-3.1 summarizes the procedures to be taken in the event that any previously unknown human remains are discovered on the SUMC Sites. Therefore, implementation of the following mitigation measure would ensure that the potential impact remains less than significant. (LTS)

CR-3.1 Conduct Protocol and Procedures for Encountering Human Remains. If human remains (including disarticulated or cremated remains) are discovered at any SUMC Project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the human remains should be halted and the Stanford University Archaeologist, City of Palo Alto, and the County coroner notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. If the remains
are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC adhered to in the treatment and disposition of the remains. The SUMC Project sponsors shall retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the City of Palo Alto, including the excavation and removal of the human remains. If the human remains cannot be avoided, and the Most Likely Descendant requests that the human remains be removed from its location, the SUMC Project sponsors shall implement removal of the human remains by a professional archaeologist. The City of Palo Alto shall verify that the mitigation is complete before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

CR-4. Impacts on Paleontological Resources. The SUMC Project could have a significant impact on unique paleontological resources or unique geologic resources. (S)

The entire Bay Area region is considered to be rich in paleontological resources, and there have been significant finds in the immediate vicinity. Paleontological resources found include a large mastodon tusk in the bank of San Francisquito Creek, the upper limb of a giant bison, and individual skeletal elements. In addition, one of the best-preserved and complete specimens of a Paleoparadoxia (“sea cow”) outside of China was discovered near the SLAC Linear National Laboratory to the west of the SUMC Sites. Although a review of the Geologic Map of California suggests that there is no fossil potential for the SUMC Sites, a Pleistocene-age creek bed occurs 15 to 25 feet below the surface of the SUMC Sites. The stream bed has been encountered under the Lucas Center and below the storm drain at Quarry Road near El Camino Real; however the precise location of the stream bed is unknown. The excavation of trenches that are at least 100 feet in length (or a sufficient length to support detailed hydrological study) or 15 feet in depth could expose the buried Pleistocene-era stream channel and intact skeletons of extinct species as previous construction activities have shown that this creek bed contains paleontological resources. Sensitivity to paleontological resources is therefore considered high throughout the vicinity of the SUMC Sites, including the SUMC Sites. Disturbance of any paleontological resource is a significant impact.

MITIGATION MEASURE. Mitigation Measure CR-4.1 provides protocol for encountering paleontological resources and would reduce the potential impacts resulting from disruption to unique paleontological resources to a less-than-significant level. (LTS)

CR-4.1 Conduct Protocol and Procedures for Encountering Paleontological Resources. Should paleontological resources be identified during SUMC Project ground-disturbing activities, the SUMC Project sponsors shall notify the City and the Stanford University Archaeologist and cease operations in the vicinity of the
potential resource until a qualified professional paleontologist can complete the following actions when appropriate:

- Identify and evaluate paleontological resources by intense field survey where impacts are considered high;
- Assess effects on identified resources; and
- Consult with the City of Palo Alto and the Stanford University Archaeologist.

Before operations in the vicinity of the potential resource resume, the SUMC Project sponsors shall comply with the paleontologist’s recommendations to address any significant adverse effects where determined by the City of Palo Alto to be feasible. In considering any suggested mitigation proposed by the consulting paleontologist, the SUMC Project sponsors shall consult with the Stanford University Archaeologist and the City to determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, cost policies and land use assumptions, and other considerations. If avoidance is infeasible, other appropriate measures (e.g. data recovery) shall be instituted to avoid a significant impact. Work may proceed in other parts of the SUMC Sites while mitigation for paleontological resources is completed.

**Cumulative Analysis**

The cumulative analysis for impacts on cultural and paleontological resources considers a broad cultural and regional system of which the resources are a part. The cumulative context for historical resources includes past projects, current projects, and probable future projects that affect historic properties/resources within the City, especially any that could affect similar resources such as other E.D. Stone-designed buildings. The cumulative context for archaeological resources includes past projects, current projects, and probable future projects that occur within the 300-foot archaeologically sensitive zone along San Francisquito Creek because resources in this sensitive area comprise a geographically distinct cluster of resources. The cumulative context for paleontological resources includes areas where the Pleistocene-age creek bed may occur below the surface. Since the exact location of the underground streambed is unknown, it is assumed that the creek runs through the SUMC Sites and adjacent areas.

**CR-5. Cumulative Impacts on Historic Resources.** The SUMC Project, in combination with other past, current, and probable future development in the City, would cause a substantial change in the significance of the City’s historic resources and thus have a significant cumulative impact. The SUMC Project’s contribution to the cumulative impact would be cumulatively considerable.

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As provided by the City for this analysis, four other projects in the City could result in potential impacts on historical resources. These projects include the preservation and rehabilitation of the historic French Laundry building and the African Methodist Episcopal
Zion Church at 260 Homer Avenue, the historic rehabilitation of 317-323 University Avenue, the rehabilitation of an existing colonial revival residence at 564 University Avenue, and the California HST project. The first three projects have been approved by the City of Palo Alto as complying with the Secretary of the Interior’s Standards for Rehabilitation, and all three historic buildings will be preserved under those projects. The environmental review process for the HST project is not complete; therefore impacts of the HST project historical resources are unknown at this time. However, the more appropriate context to evaluate cumulative impacts would be to examine other E.D. Stone buildings. The following provides the current condition of other E.D. Stone buildings in Palo Alto in order to determine the project’s cumulative contribution to potential impacts on Stone’s work.

The SUMC Project would result in a significant impact on historical resources, including the demolition of the Stone Building complex. In addition to the Stone complex, E.D. Stone built three other buildings in Palo Alto; the Palo Alto Civic Center, Palo Alto Main Library, and Mitchell Park Library. The Palo Alto Civic Center and the Mitchell Park Library have both been evaluated by ARG. It was determined that both lacked sufficient integrity to qualify as historical resources. However, the Palo Alto Main Library has been determined eligible for the NRHP. Currently, plans call for renovation and expansion of the Main Library and the relocation of the City Police Department and Emergency Operations facilities from their current location within Palo Alto Civic Center to the proposed Public Safety Building. It is uncertain at this time whether or not the HST project would impact other works of E.D. Stone.

In combination with the SUMC Project, cumulative development above would have cumulatively significant impacts on historic resources in the City because these would together result in adverse impacts (loss) of at least one historically significant structure. Only one other E.D. Stone building in Palo Alto, the Palo Alto Main Library retains sufficient integrity to be eligible for listing. The demolition of the Stone Building complex would comprise a considerable loss of an historical resource that is a unique and non-renewable member of a finite class. The demolition of the Stone Building complex would have a cumulatively considerable impact due to the small body of E.D. Stone’s work present in the City that retains sufficient integrity to be eligible as historical resources.

**Mitigation Measures.** Due to the demolition of the Stone Building complex, the SUMC Project’s contribution would remain cumulatively considerable as this impact cannot be avoided. Implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce the SUMC Project’s contribution to the cumulative impact, but not to a less than cumulatively considerable level. (SU)
CR-6. **Cumulative Impacts on Prehistoric and/or Archaeological Resources and Human Remains.** The SUMC Project, in combination with other reasonably foreseeable probable future development, could cause a substantial change in the significance of prehistoric and/or archaeological resources or human remains and thus contribute to a significant cumulative impact. The SUMC Project is conservatively assumed to have a considerable contribution. (S)

The cumulative context for archaeological resources is defined as the 300-foot archaeological zone along San Francisquito Creek that runs within Palo Alto as well as Menlo Park, East Palo Alto, and Stanford University lands in unincorporated Santa Clara County. Based on the Cumulative Projects list within the City (see Section 3.1, Introduction to Analysis and Appendix B), two residential projects are planned along San Francisquito Creek as well as a portion of the HST project. The HST project includes a segment proposed along the existing Caltrain right-of-way between San Jose and San Francisco, which would cross the San Francisquito Creek in Palo Alto. Both of the residential projects were found to have no archaeological impacts and the environmental review process for the HST project is not complete, although the HST project could impact prehistoric resources within the 300-foot zone. All other probable future projects are outside of the archaeologically sensitive zone along San Francisquito Creek. The Emergency Reservoir project approved by the City of Palo Alto would be constructed at El Camino Park, near San Francisquito Creek. No archaeological sites were identified during the archival search or the survey; however one well site is located in along the bank of San Francisquito Creek and a second is located within 1,000 feet of the creek. The project was determined to have no significant impacts to archaeological resources with implementation of mitigation measures. The SUMC Project would involve ground-disturbing activities; however, the SUMC Sites are entirely outside of the 300-foot archaeologically sensitive zone along San Francisquito Creek and therefore the SUMC Project is not likely to affect Native American or historic-period archaeological resources. As such the SUMC project’s contribution would be less than cumulatively considerable. In the unlikely event that cultural resources are discovered during construction the disturbance of intact archaeological resources could contribute to a significant cumulative impact. Nonetheless, due to the potential for impact, this analysis conservatively concludes that the SUMC Project could have considerable impacts on prehistoric and/or archaeological resources and human remains.

**MITIGATION MEASURES.** Compliance with Mitigation Measures CR-2.1 and CR-3.1 would reduce the SUMC Project’s contribution to the cumulative impact to a less than cumulatively considerable level. (LTS)

CR-7. **Cumulative Impacts on Paleontological Resources.** The SUMC Project, in combination with other reasonably foreseeable probable future development where the Pleistocene-age creek bed may occur, could have a significant cumulative impact. Such an impact would occur if the buried Pleistocene-age creek bed is exposed in lengths greater than approximately 100 feet (or a sufficient length to support detailed hydrological study) and if such deposits contain substantially intact skeletons of extinct species. These conditions would represent a major find for regional paleontology. In the case that significant paleontological finds—such as stretches
of buried Pleistocene-age creek bed greater than 100 feet in length and containing intact skeletons of extinct species—are made on the SUMC Site, then the SUMC Project’s contribution to the cumulative impact on paleontological resources could be cumulatively considerable. (S)

As stated above, the cumulative context for paleontological resources includes areas where the Pleistocene-age creek bed may occur below the surface. Reasonably foreseeable probable future development in the SUMC Sites and adjacent areas includes (1) approved but unconstructed development under the Stanford University Community Plan and General Use Permit (CP/GUP), which would include additional academic facilities, housing units, parking, and associated utilities, roadways and bikeways in the adjacent Stanford University property; and (2) demolition of existing structures and construction of a three-story medical office building at 777 Welch Road. The HST project could be constructed in an area that may contain the Pleistocene-age creek bed. The location, extent, and depth of the underground streambed resource that underlies the SUMC Sites is not sufficiently well defined to establish whether the disruption caused by each of these projects would or would not be significant. Because the exact location of the resource is unknown, it is assumed that the underground streambed underlies the SUMC Sites and adjacent areas. Consequently, reasonably foreseeable probable future development projects to cumulative effects on the paleontological resources that could occur in the streambed could be significant.

The potential contribution of the SUMC Project to the cumulative impact would be cumulatively considerable as disturbance under the SUMC Project would comprise a major portion of ground disturbance (and potential disturbance of the Pleistocene-age creek bed).

Mitigation Measure. Compliance with Mitigation Measure CR-4.1 would reduce the SUMC Project’s contribution to the cumulative impact to a less than cumulatively considerable level. (LTS)