Historic Resources Board
Staff Report (ID # 14274)

Report Type: Action Items **Meeting Date:** 4/28/2022

Summary Title: 525 University Avenue Architectural Review (21PLN-00209)

Title: CEQA PUBLIC HEARING / QUASI-JUDICIAL. 525 University Avenue [21PLN-00209]: Review of Proposed Exterior Modifications for Compliance with Secretary of the Interior's Standards, Associated with Architectural Review Application. Property was Found Eligible for Listing on the California Register of Historical Resources. Environmental Assessment: California Environmental Quality Act (CEQA) Exempt per Guidelines 15301 for Existing Structures.

From: Jonathan Lait

Recommendation
Staff recommends that the Historic Resources Board (HRB) take the following action(s):

1. Provide a recommendation regarding the proposed exterior modifications, confirming the project's consistency with the Secretary of the Interior Standards for Rehabilitation.

Report Summary
In 2020, the City of Palo Alto determined the Palo Alto Office Center at 525 University Avenue eligible for the California Register of Historical Resources. The project is subject to a discretionary review process, Architectural Review, for exterior modifications; therefore, staff reviewed the project pursuant to the California Environmental Quality Act (CEQA). The HRB is requested to confirm the project will not be detrimental to an eligible historic resource and find the exterior modifications to the Palo Alto Office Center will meet the Secretary of the Interior's Standards for Rehabilitation.

The HRB is requested to support staff's review of the Architectural Review application, by providing a recommendation to the Director of Planning and Development Services, particularly with respect to Architectural Review Finding 2b. The project is the renovation of the exterior

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landscape courts and curtain wall replacement at the first three stories of the reinforced concrete building.

Staff and the City's consultant (M-Group) reviewed the project and the conclusions of the applicant's historic preservation consultant (Page & Turnbull) and concur:

(1) the description of character-defining features
(2) the proposed Landscape Project retains and preserves the overall historic character of the Palo Alto Office Center,
(3) the rehabilitation is mostly consistent with the Secretary of the Interior Standards and "it does not appear that the project will cause a significant impact" pursuant to the California Environmental Quality Act (CEQA).

The City's consultant peer-review reports regarding the Landscape Project and Seismic Strengthening Project are provided as Attachments B and C to this report.

Background/Project Description

HRB Purview

The HRB purview on Architectural Review applications includes "informing the ARB of the historical and/or architectural significance of historic commercial and multiple-family structures in the downtown area and any such buildings designated as significant elsewhere in the City that are under review by the Architectural Review Board. *Submit recommendations to the Architectural Review Board regarding proposed exterior alterations of such historic structures".*

This is the opportunity to provide a recommendation to the Director regarding the proposed exterior alterations, which are considered minor and as such, may be processed as a staff level Architectural Review. To support staff's review, the HRB is requested to confirm the project will meet Architectural Review Finding #2b.

Site Description

The project site is zoned CDC-P (Commercial Downtown Community with Pedestrian Shopping combining district.) The 1.36-acre site has frontages on University Avenue, Cowper Street, and Tasso Street. The property abuts another office complex at 530 Lytton Avenue. The building features a central 15-story office tower that reaches a height of 234 feet. Two 2-story commercial wings are connected to the tower by elevated pedestrian bridges. The buildings were designed by architect Tallie Maule for local real estate developers Hare, Brewer & Kelley and were completed in 1966. A three-story underground parking garage is located below a semi-public but privately-owned plaza.

The development on the site is considered a non-complying facility. Changes to the City's zoning standards after initial construction rendered the property a legal, non-complying facility, as defined in the PAMC Section 18.70.010 and further governed by regulations in PAMC Section 18.18.120. The property is non-complying with respect to height (vs. 50 feet maximum height limit per current code) and Floor Area Ratio (FAR) which is based on lot size.

Historic Resource Evaluation (HRE)

525 University Avenue is not currently listed on any federal, state, or local register of historic resources. The attached HRE prepared in December 2020 found the building to be eligible for the California Register of Historical Resources. The property is eligible for listing on the California Register of Historical Resources under Criterion 3 (Architecture), as an excellent local example of Late Modernist design by master architect Tallie Maule. The period of significance is 1966, the year of completion. The building was found to retain all seven aspects of integrity. At the time of construction, the office tower was the tallest building between San Francisco-Oakland and Los Angeles; today it remains the tallest building in Palo Alto. The HRE is provided as Attachment B to this report.

Seismic Strengthening Project

In 2021, the applicant proposed seismic strengthening measures within the interior of the structure only. Staff retained a historic preservation consultant (Mgroup) to review the interior seismic strengthening project. The City's consultant determined the project would not impact the structure's character-defining features, which are visible on the exterior of the structure, and would not cause a significant impact" pursuant to CEQA. The consultant report is attached to this report as Attachment C. The building permit application for the seismic project was submitted and issued.

Project Description

The project includes:

- Attachment of a new metal pergola structure/windscreen to the west side of main tower
- Addition of a new free-standing pergola on the upper plaza
- Replacement of curtain wall on four sides of the first three stories of the main tower building with in-kind low-e glazing/mullion pattern (a bronze anodized aluminum material)
- Retention of the existing granite spandrel and cladding; black, back-painted glass panels will be installed over the existing panels
- Interior renovation of the main tower ground floor lobby and insertion of new doorways
- New glazed enclosure for the existing exterior plaza stair to the underground parking garage
- Replacement of waterproofing above the structural slab at grade
- Replacement of hardscaping at the plaza including construction of new planters
- Addition of new vegetation in the planters

Discussion

Requested Entitlements, Findings and Purview

The applicant requests approval of an Architectural Review application. The process for evaluating an AR application is set forth in PAMC 18.77.070. AR applications are typically forwarded to the Director of Planning & Development Services for entitlement decision. AR projects are evaluated against specific AR findings. All findings must be made in the affirmative to approve the project. Failure to make any of the applicable AR findings requires project redesign or denial. The HRB is requested to provide a recommendation based on the project's consistency with the SOI Standards and feedback on AR Finding #2b, which is:

> "*The project has a unified and coherent design that preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant.*"

AR Finding #1 pertains to the project's conformance with the Comprehensive Plan and compliance with the Zoning Code. Staff has reviewed the project and determined the project meets AR Finding #1.

Comprehensive Plan Conformance

As noted, this property is not currently listed on the City's historic inventory; it is therefore not listed as a 'significant historic building', but it is eligible for listing on the California Register of Historical Resources. With discretionary review, the project is reviewed for conformance with Comprehensive Plan historic preservation/rehabilitation programs/policies apply to Downtown historic resources:

• Policy L-7.1: Encourage public and private upkeep and preservation of resources that have historic merit, including residences listed in the City's Historic Resource Inventory, the California Register of Historical Resources, or the National Register of Historic Places.

• Program L-7.1.1: Update and maintain the City's Historic Resource Inventory to include historic resources that are eligible for local, State, or federal listing. Historic resources may consist of a single building or structure or a district.
• Policy L-4.7: Maintain and enhance the University Avenue/Downtown area as a major commercial center of the City, with a mix of commercial, civic, cultural, recreational and residential uses. Promote quality design that recognizes the regional and historical importance of the area and reinforces its pedestrian character.
• Policy L-7.5: To reinforce the scale and character of University Avenue/Downtown, promote the preservation of significant historic buildings.
• Program L-7.8: Promote adaptive reuse of old buildings.
• Policy L-7.12: Maintain the historic integrity of building exteriors. Consider parking exceptions for historic buildings to encourage rehabilitation.

Zoning Compliance
The property is zoned CD(C)(P). The Pedestrian Shopping (P) combining district is intended to modify the regulations of various commercial districts. This is found in locations where it is deemed essential to (1) foster the continuity of retail stores and display windows and (2) avoid a monotonous pedestrian environment. The (P) district goal is to establish and maintain an economically healthy retail district.

The existing building at 525 University Avenue exceeds the maximum 50-foot height limit and maximum Floor Area Ratio (FAR), with 199,120 square feet (sf) of floor area, on a 59,063 sf lot. The project does not include increases in height, floor area, or lot coverage. The pergolas do not count toward lot coverage, nor toward gross floor area.

Nomination to Local Inventory
The building is not listed on the City's historic inventory currently. At some point, the HRB may consider whether to nominate this building to the City's local inventory. The HRB's purview includes: "Recommend to the Council the designation of additional buildings and districts as historic. Research available information and add historical information to the inventory sheets of historic structures/sites."

The applicant has not requested nomination to the City's inventory. Council recently directed staff to pursue nominations of properties found eligible for the National and California Registers to the City's inventory. The Council's focus was residential properties at risk for demolition due to various available ministerial application processes. Ministerial processes do not include CEQA review. This commercial property is subject to discretionary processes and CEQA review.

Eligibility for Listing on California Historic Register and Integrity
The HRE (Attachment A) examines the subject property's eligibility for listing on the California Register of Historic Resources (California Register). A property may be eligible for listing on the California Register, if it is found to be significant under one or more of the following criteria:
• Criterion 1, Events

• Criterion 2, Persons
• Criterion 3, Architecture
• Criterion 4, Information Potential

According to the HRE, the property appears individually eligible for Criteria 3. The peer review memorandum concurs with the HRE's conclusions.

The HRE also evaluates the existing building's integrity for eligibility of listing on any local, state or national historic register. Without integrity, the property cannot remain eligible for listing on any register. In order to qualify for listing in any local, state or national historic register, a property must possess significance under at least one evaluative criterium. The HRE found the property retains all seven aspects of integrity, as defined by the California Office of Historic Preservation and National Park Service. The seven aspects that define integrity include: Location, Setting, Design, Materials, Workmanship, Feeling, and Association.

Eligibility for the California Register qualifies the building for use of the State Historic Building Code (SHBC), per Health and Safety Code Section 18955. Use of the SHBC can be helpful in preserving a historic building's integrity. Listing a building on the City's Historic Inventory would also qualify the building for SHBC use.

Compliance with Secretary of Interior's Standards

Staff retained consultant assistance to peer review the evaluation as to how the proposed changes would meet the SOI Standards for Treatment of Historic Properties, summarized in the following table. The peer review memo concurs with the HRE report conclusions.

#	SOI Standards for Rehabilitation	Analysis
1	*A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: The proposed project will continue the commercial office use of 525 University Avenue with a center-block outdoor plaza. Thus, the project is in compliance with Rehabilitation Standard 1.
2	*The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: The historic character of the property will be retained and preserved in the proposed project. No alterations are proposed at the two low-rise wings or enclosed pedestrian bridges, and nearly all of character-defining features at the main tower will remain unaltered, including the massing, design, and tripartite composition of the 15-story main office tower, the bush-hammered concrete columnsat the tower base, the cantilevered tower shaft and all windows at the shaft, blue tile soffit at the shaft, recessed penthouse, original entrance locations, and exposed concrete columns at the lobby. The proposed project involves creating greater visual transparency and access at the three-story base of the main tower. The proposed project will replace the historic three-story base mullions in- kind with a matching

#	SOI Standards for Rehabilitation	Analysis
		pattern and bronze anodized aluminum material to accommodate new transparent low-e glass. The granite spandrel panels are to be retained in place. Thus, the character of the three-story storefront windows at the base will be retained. The interior lobby has been remodeled previously and has non-original finishes at the floor, ceiling,and walls. The project sponsor has committed to salvaging and reusing the remaining original sideways T-shape door handles inside the lobby, and the historic concrete columns at the interior will remain exposed. Thus, the interior remodel will not diminish the historic character of the building. Although extensive alterations are proposed to the hardscaping and landscaping features of the site, including removal of planters, stairs, and the elevator tower, the brick paving along Cowper andTasso streets and at the corners with University Avenue will be retained, and the character of an open center-block plaza with two levels separated by broad steps will be retained. Furthermore, the spatial relationships between the tower, two low-rise wings, and the University Avenue streetscape will be retained. As such, the historic integrity of design, materials, feeling, association, and setting will all be retained and the historic character of the property as a Late Modern office tower complex with a center-block plaza will be preserved. Thus, the project is substantially in compliance with Rehabilitation Standard 2.
3	*Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: No conjectural features or architectural elements from other buildings will be added to the building. The prosed additions of the two metal pergolas at the center-block plaza, glazed stair enclosure, and new planters will be clearly contemporary and will not create a false sense of historical development. Thus, the project is in compliance with Rehabilitation Standard 3.
4	*Changes to a property that have acquired historic significance in their own right will be retained and preserved.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: The period of significance for 525 University Avenue is 1966-1976. No changes or additions have occurred since 1976 that have acquired historic significance in their own right. Thus, the project is in compliance with Rehabilitation Standard 4.
5	*Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: As described in Standard 2, distinctive features, finishes, and examples of craftsmanship will be preserved in their entirety at the low-rise buildings and the shaft of the tower. The dramatic and distinctive concrete columns with

#	SOI Standards for Rehabilitation	Analysis
		curved projections and fillet corner joints at the tower base will also be preserved. The three-story storefront window mullions at the tower base will be replaced in-kind, preserving their character and the granite spandrel panels will be preserved in place. The reinforced concrete construction, distinctive projecting precast concrete panels at the tower shaft and projecting concrete columns at the low-rise office buildings, which exhibit the craftsmanship of the mid-twentieth century, will be retained. As previously noted, the remaining original sideways T- shape door handles inside the lobby will be salvaged and reused. The metal mechanical room gate at the rear (west) façade of the main tower will also be retained. The plaza planters, steps, and elevator tower will be removed. Although the brick paving will be removed from the plaza, the brick paving will be retained along the low-rise buildings at Cowper and Tasso streets, and at the corners with University Avenue, which are in the publicly accessible right-of-way. While the proposed project does involve the removal of some distinctive features, these are at the rear plaza and the vast majority of distinctive features and finishes—particularly at the main tower and two low-rise wings will be preserved. Thus, the project is substantially in compliance with Rehabilitation Standard 5.
6	*Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: The project does not include any deteriorated historic materials that will be removed or replaced. Thus, the project is in compliance with Rehabilitation Standard 6.
7	*Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: The project does not include any physical or chemical treatments to clean or remove historic materials or finishes. Thus, the project is in compliance with Rehabilitation Standard 7.
8	*Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*	☐ CONSISTENT ☐ NOT CONSISTENT ■ NA Explanation: Limited excavation will be required for repaving and waterproofing the plaza, but do not appear likely to disturb any ground that was not previously disturbed during original construction. In the case of discovery of archaeological materials, provided that standard discovery procedures for the City of Palo Alto are followed, the proposed project will adhere to Rehabilitation Standard 8.
9	*New additions, exterior alterations or related new construction will not*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA

#	SOI Standards for Rehabilitation	Analysis
	destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.	Explanation: Per the discussion in Standards 2 and 5, the proposed project includes the replacement of the three-story storefront windows at the base. The bronze anodized aluminum mullions will be replaced in- kind to match the existing pattern and profile, but will accommodate new transparent low-e glazing, and the historic granite spandrel panels will be preserved in place. This treatment is compatible and retains the character of Tallie Maule's Late Modern tower design. While new paired, fully glazed entry doors will be installed at the east façade fronting University Avenue and at the rear (west) façade facing the plaza (where currently storefront windows exist), these fully glazed doors are compatible in design and will be within the existing storefront window mullion pattern. They will not destroy the historic character or spatial relationships. The historic entryways to the tower, below the two pedestrian bridges on the north and south facades, will be retained as entrances; the currently existing doors are replacement doors and will be replaced with new compatible fully glazed doors. The addition of the metal pergola at the rear (west) façade of the main tower does not destroy historic materials and is reversible (as discussed later relative to Standard 10). The pergola is clearly modern in its material and metal design, but is compatible in design, as the supporting columns at the outer edge of the pergola align with the historic concrete columns of the tower. Additionally, the upturned edge of the pergola appears to take cues from the curve of the projecting portions of the concrete columns, and the perforated metal pattern appears to take cues from the existing metal gate at the mechanical room on the west side of the building (which will be below the pergola). The grid of the pergola roof structure also appears to match the grid of the existing waffle slab concrete floor plates of the tower, which will be exposed at the interior lobby. The scale of the metal pergola responds to the existing levels of the floor plate and maintains open circulation at the plaza without disrupting the spatial relationship of the tower to the adjacent low-rise wings or the open rear plaza. Existing concrete planters will be removed, and new concrete planters will be installed in front of thelow-rise office buildings and at the center-block plaza. These planters are compatible in material, scale, and design with the character of the site and do not disrupt the spatial relationships between the three buildings, the relationship to University Avenue, or the open character of the plaza. Proposed metal fencing in the upper plaza references the pattern of the original metal gate at the west façade of the tower. The former elevator structure, which has previously

#	SOI Standards for Rehabilitation	Analysis
		been altered and made non-functional, will be removed and a new glass stair enclosure will be installed at the upperplaza stair to the below-ground parking garage. The removal of the elevator structure does not significantly alter the character of the plaza, and the new stair enclosure will be clearly contemporary, but compatible in scale. It will not disrupt the flow or sightlines in the plaza. The steps at the plaza will be replaced with broader stadium steps for seating, but the character of the two-tiered plaza will remain. As previously noted, the brick paving will be retained along the low-rise office buildings on Tasso andCowper streets, and at the corners with University Avenue. Non-original paving currently exists immediately surrounding the main tower. The non-original paving and sections of the brick paving along University Avenue and at the center-block plaza will be replaced with cast-in-place concrete in order to address waterproofing and maintenance concerns. While this new paving will remove some historic material, the new paving is designed to be scored on a 9'-by-9' grid which aligns with the existing brick pattern. Thus, the grid pattern, which also aligns with the structural bays of the historic buildings, will be carried through the site in the proposed new paving, and the original brick material will remain in large sections of the highly visible public right-of-way along Tasso and Cowper streets. The proposed project involves hardscaping and landscaping alterations that will remove and/or replaces some materials and features, but the overall character and spatial relationships of the office tower complex with an open, two-tiered center-block plaza will remain intact. Tallie Maule's original designs included a number of iterations with varying designs of the center-block plaza, and also planned for additional buildings and development on the block in the future. In the proposed project, the function of the semi-public open plaza will be retained, and a significant portion of the brick paving at the public right-of-way will be retained. The new addition of the metal pergolas is compatible in scale and design and will be reversible. The larger pergola (wind screen) at the main tower will be minimally visible from the public right-of-way along Tasso and Cowper streets. Most of historic materials and character-defining features will remain intact and untouched by the proposed project. The site will still be legible as a cohesive office complex. Thus, the project is substantially in compliance with Rehabilitation Standard 9.
10	*New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic*	■ CONSISTENT ☐ NOT CONSISTENT ☐ NA Explanation: None of the three buildings at 525 University Avenue are being expanded with additions. The erection of the metal pergola at the rear (west) side of the tower is designed

#	SOI Standards for Rehabilitation	Analysis
	property and its environment would be unimpaired.	such that it is anchored in the existing battered concrete columns. Thus, if removed in the future, the essential form and integrity of the historic tower will remain intact and require only minimal concrete patching to repairthe anchor points. The proposed project currently has two alternative treatments at the existing granite spandrel panels at the base of the tower; both alternatives will retain the existing granite spandrel panels in place and install back-painted glass panels over them. These panels will be reversible and could be removed in the future to reveal the historic granite spandrel panels in their original locations. If the proposed new planters and landscaping, stair enclosure, or free-standing pergola at the upper plaza are removed, the spatial relationship between the main tower and two low rise buildings will be retained and the open character of the center-block plaza will be retained. Thus, the project is in compliance with Rehabilitation Standard 10.

Environmental Review

The subject project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. Specifically, the project is exempt under CEQA pursuant to three classes:

• Class 1 (Section 15301) for existing structures, since the project proposes repair, maintenance, minor alterations and involves a negligible or no expansion of existing or former use

Public Notification, Outreach & Comments

At the publication of this report staff had not received public comments regarding the project. Notice of the HRB meeting was published in the Daily Post on April 15, which is 13 days in advance of the meeting. Postcard mailing occurred on April 13, which is 15 in advance of the meeting.

Next Steps

This is the only public hearing planned for the Architectural Review application. Staff Architectural Review is underway.

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Attachments:

- Attachment A: 525 University Ave HRE (PDF)
- Attachment B: 525 University SOIS Compliance Landscape Project (PDF)
- Attachment C: 525 University Seismic Project SOIS Evaluation August 2021 (PDF)

[1] Emails may be sent directly to the HRB using the following address: hrb@cityofpaloalto.org

PAGE&TURNBULL

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525 UNIVERSITY AVENUE
HISTORIC RESOURCE EVALUATION

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PREPARED FOR:
CITY OF PALO ALTO PLANNING & DEVELOPMENT SERVICES

December 3, 2020

TABLE OF CONTENTS

I. INTRODUCTION

This Historic Resource Evaluation (HRE) has been prepared at the request of the City of Palo Alto for the property at 525 University Avenue (APN 120-03-069), known as the Palo Alto Office Center. The subject property is located on 1.36-acre parcel that extends across approximately two-thirds of a downtown city block, bounded by Tasso Street to the north, University Avenue to the east, Cowper Street to the south, and the commercial property at 530 Lytton Avenue to the west.[1] The property is located in the Downtown North neighborhood of Palo Alto in a commercial CD-C (P) zoning district **(Figure 1)**. The property includes three buildings: a central 15-story office tower and two two-story commercial wings that are connected to the tower by elevated pedestrian bridges. The buildings were designed by architect Tallie Maule for local real estate developers Hare, Brewer & Kelley and were completed in 1966 **(Figure 2)**. A three-story underground parking garage is located below a semi-public but privately-owned plaza.

Figure 1. City of Palo Alto parcel map. Subject property indicated by blue outline.
Source: City of Palo Alto, Online Parcel Reports, 2020.

[1] The subject block is oriented northeast of true north, but for the purposes of this report northeast (facing Tasso Street) will be referred to as north, and so on.

Figure 2. Bird's-eye view of 525 University Avenue, indicated by red dashed outline.
Source: Google Maps, 2020. Edited by Page & Turnbull.

Methodology

This report follows a standard outline used for Historic Resource Evaluation reports, and provides a summary of the current historic status, a building description, and a historic context for 525 University Avenue. The report includes an evaluation of the property's individual eligibility for listing in the California Register of Historical Resources (California Register).

Page & Turnbull prepared this report using research collected at various local repositories, including the Palo Alto Development Services, Palo Alto Historical Association (PAHA), and University of California, Berkeley Environmental Design Archives, as well as online sources including Ancestry.com and Newspapers.com. Key primary sources consulted and cited in this report include Palo Alto building permit applications, city and county directories, and historical newspapers.

The UC Berkeley Environmental Design Archives' Tallie Maule Collection contains a substantial amount of material related to the Palo Alto Office Center project, including 60 sheets of construction, various design and site development drawings, documents related to office layout and tenant leasing, clippings and public relations materials, as well as slides and photographs. Page &

Turnbull was able to view reference photos of some of this material, provided through email by the staff at the Environmental Design Archives. However, due to restrictions in place to prevent the transmission of COVID-19 during the course of preparing this report, Page & Turnbull was not able to view all the materials in the collection.

All photographs in this report were taken by Page & Turnbull during a site visit in October 2020, unless otherwise noted.

Summary of Findings

525 University Avenue is not currently listed on any federal, state, or local register of historic resources. The property is eligible for listing on the California Register of Historical Resources under Criterion 3 (Architecture) as an excellent local example of Late Modernist design by master architect Tallie Maule.

II. EXISTING HISTORIC STATUS

The following section examines the national, state, and local historic status currently assigned to 525 University Avenue.

National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

525 University Avenue is not currently listed in the National Register.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

525 University Avenue is not currently listed in the California Register.

California Historical Resource Status Codes

Properties listed or under review by the State of California Office of Historic Preservation are listed within the Built Environment Resource Directory (BERD) and are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register) or California Register of Historical Resources (California Register).[2] Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual

[2] California State Office of Historic Preservation, Built Environment Resource Directory (BERD), Santa Clara County, updated March 2020.

importance. Properties with a Status Code of "6" are not eligible for listing in either register. Finally, a Status Code of "7" means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

525 University Avenue is not currently listed in the BERD database for Santa Clara County with a status code. The most recent update to the BERD database was in March 2020.

Palo Alto Historic Inventory

The City of Palo Alto's Historic Inventory lists noteworthy examples of the work of important individual designers and architectural eras and traditions as well as structures whose background is associated with important events in the history of the city, state, or nation. The inventory is organized under the following four categories:

- **Category 1**: An "Exceptional Building" of pre-eminent national or state importance. These buildings are meritorious works of the best architects, outstanding examples of a specific architectural style, or illustrate stylistic development of architecture in the United States. These buildings have had either no exterior modifications or such minor ones that the overall appearance of the building is in its original character.

- **Category 2**: A "Major Building" of regional importance. These buildings are meritorious works of the best architects, outstanding examples of an architectural style, or illustrate stylistic development of architecture in the state or region. A major building may have some exterior modifications, but the original character is retained.

- **Category 3 or 4**: A "Contributing Building" which is a good local example of an architectural style and relates to the character of a neighborhood grouping in scale, materials, proportion or other factors. A contributing building may have had extensive or permanent changes made to the original design, such as inappropriate additions, extensive removal of architectural details, or wooden façades resurfaced in asbestos or stucco.

525 University Avenue is not currently listed in the City of Palo Alto Historic Inventory.

Palo Alto Historic Survey Update

Between 1997 and 2000, a comprehensive update to the 1979 Historic Inventory was undertaken by historic preservation firm Dames & Moore.[3] The goal of this update was to identify additional properties in Palo Alto that were eligible to the National Register. This effort began with a

[3] Dames & Moore, Michael Corbett, and Denise Bradley. "Final Survey Report – Palo Alto Historic Survey Update: August 1997-August 2000." Prepared for the City of Palo Alto Planning Division, February 2001.

reconnaissance survey of approximately 6,600 properties constructed prior to 1947. The reconnaissance survey produced two Study Priority lists. Approximately 600 properties were identified as Study Priority 1, indicating they appeared individually eligible for listing in the National Register under Criterion C (Architecture). Approximately 2,700 properties were identified as Study Priority 2, representing those properties that did not appear individually eligible to the National Register under Criterion C (including common local building types) but retained high integrity. [4]

The reconnaissance survey was followed by an intensive-level survey of all Study Priority 1 and 2 properties. Historic research was conducted on the owners, architects/builders, and past uses of the Study Priority 1 properties. Research also informed the preparation of historic context statements on topics such as local property types, significant historical themes, and prolific architects and builders, in order to identify any potential significant associations of Study Priority 2 properties.

In January 1999, Dames & Moore prepared an interim findings report that listed preliminary evaluations of the National Register and California Register eligibility of Study Priority 1 and 2 properties. 291 properties were found potentially eligible as individual resources to the National Register and California Register. 1,789 further properties were found potentially eligible to the California Register only. Because the survey focused on determining National Register eligibility, the project did not finalize the preliminary evaluations regarding potential California Register eligibility.

525 University Avenue is not listed with the Palo Alto Historic Survey Update.

[4] Ibid., 2-5.

III. ARCHITECTURAL DESCRIPTION

The subject property at 525 University Avenue is a through-lot commercial property with a 15-story office tower, two two-story office wings, and a three-story below-ground parking garage **(Figure 3)**. The three office buildings were completed in 1966 and were designed by Tallie Maule in a Late Modernist style. The buildings are connected by enclosed pedestrian bridges, but are each separately described in the following sections.

Figure 3. Aerial view of 525 University Avenue, indicated by red dashed outline. A = Office Tower; B = North Wing; and C = South Wing. Source: Google Maps, 2020.

Office Tower

The main office tower is a 15-story reinforced concrete building with a 100 foot by 100 foot square plan, capped by a flat roof **(Figure 4)**. The tower has a tripartite arrangement with a three-story base, cantilevered 11-story shaft, and a 15th story penthouse with a projecting flat roof on all four sides. A mechanical penthouse with various telecommunications equipment is located on the roof of the 15th floor. Except for the entrances at the ground floor and connection points of the pedestrian

bridges to the adjacent office wings, all four facades of the office tower are identical. As such, rather than describing each façade of the tower, the following description is organized by base, shaft, and penthouse.

Figure 4. Main office tower and connected north wing, looking southeast.

BASE

The base of the office tower is triple-height and defined by massive, bush-hammered concrete columns. Each column, which has a rectangular footprint, cants outward at the bottom and curves up and projects out at the top **(Figure 5)**. The curved projecting portions of the columns support the cantilevered base of the tower above **(Figure 6)**. The bottom of the overhanging portion of the tower shaft is clad in small dark blue rectangular tiles and features inset can lights. The concrete columns have fillet corner joints.

Figure 5. Bush-hammered concrete columns at base of office tower, looking southwest.

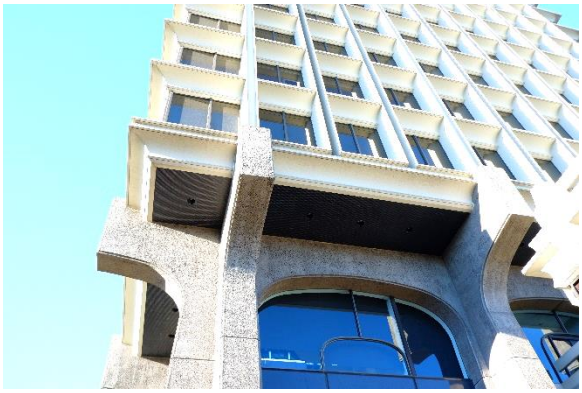

Figure 6. Curved portion of the columns, supporting the cantilevered shaft of the office tower.

Each of the four facades has three window bays separated by a concrete column **(Figure 7 and Figure 8)**. The triple-height windows are set in three centered arched openings. The curve of the arched window openings matches the curve of the cantilevered portion of the projecting concrete columns. The bronze anodized aluminum frame windows have a tripartite arrangement with mirrored glass at the ground floor and second floor mezzanine. A band of black granite panels is located above the ground and second floor glazing, and the arched portions of the windows at the third floor have inset arched divided lites with translucent glazing.

Figure 7. Base at the east façade of the office tower, looking northwest.

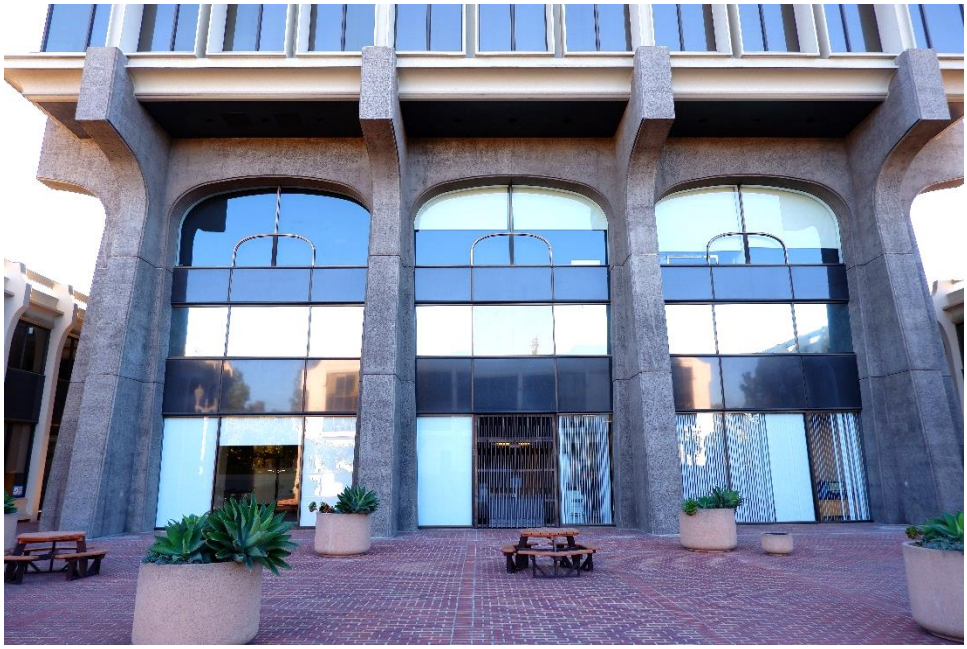

Figure 8. Base at the west façade of the office tower, looking east.

Exceptions to the typical fenestration at the ground floor include the lobby entry doors at the center bay of the north and south facades and the second stories above the lobby entrances, where enclosed pedestrian bridges connect to the adjacent north and south wings. At the central window

bay on the west facade, a metal gate is located at the center of the window composition, accessing a mechanical area **(Figure 9)**. At the south façade, a non-original fully glazed exit door is located in the east (right) portion of the westernmost window bay **(Figure 10)**.

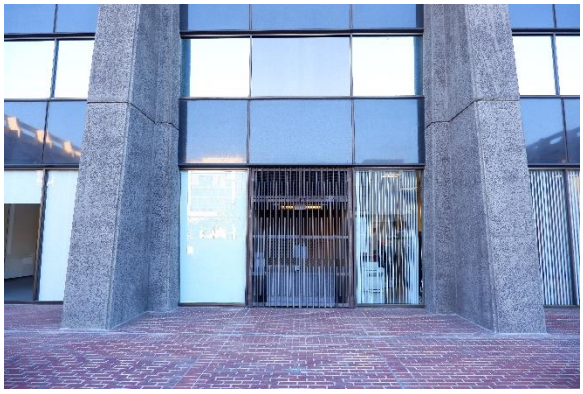

Figure 9. Metal gate at the center of the west façade, accessing a mechanical area.

Figure 10. Non-original exit door at south façade.

Interior Lobby

The interior lobby of the main office tower is currently the only semi-public interior space in the complex. Accessed from the central bay of the north and south facades, the lobby entrances have fully glazed storefront window systems with two double-doors **(Figure 11)**. The concrete columns of the building are also exposed at the interior of the lobby space **(Figure 12)**. The lobby has a north and south area connected by a hall in front of a bank of elevators. The security desk is located in the hall, facing the elevators, and several ground floor tenant office spaces are accessed off of the north and south portions of the lobby. A non-original curved coved ceiling runs in front of a bank of elevators, connecting the north and south portions of the lobby **(Figure 13)**. The bronze anodized aluminum framed full-height glazed partition walls are original, although portions of the glazing have been frosted or covered with an opaque film. Original, curved T-shape bronze anodized interior door handles reflect the curved shapes of the exterior concrete features **(Figure 14)**. The granite flooring, wood wall panels, light fixtures, and the ceilings are non-original.

Figure 11. South lobby entrance, below the enclosed pedestrian bridge, looking northeast.

Figure 12. Exposed concrete columns are located in the lobby space. Floor and ceiling materials are non-original.

Figure 13. Coved ceiling in front of the elevator bank between the north and south portions of the lobby.

Figure 14. Ground floor office tenant space, accessed from the lobby, with shaped bronze anodize aluminum door handles.

SHAFT

The 11-story shaft of the tower is cantilevered on all four sides, projecting over the base and supported by the curved, exposed concrete columns **(Figure 15 and Figure 16)**. The shaft is identical at all 11 floors, and at each of the four facades. Each floor has 11 window bays at each façade. All of the windows feature fixed bronze anodized aluminum windows with one vertical muntin dividing two vertically oriented “solar bronze glass” lites. At the corners, the windows meet at the corner with a bronze anodized aluminum fillet joint muntin. Each window bay is surrounded by a projecting concrete panel frame, which form vertical channels that extend the full length of the shaft **(Figure 17)**. Between each floor is a projecting overhang with a curved underside, articulating each story and providing shade at the interior.

Figure 15. North (left) and west (right) facades of the office tower shaft, looking southeast down Tasso Street.

Figure 16. South (left) and east (right) facades of the office tower shaft, looking north up University Avenue.

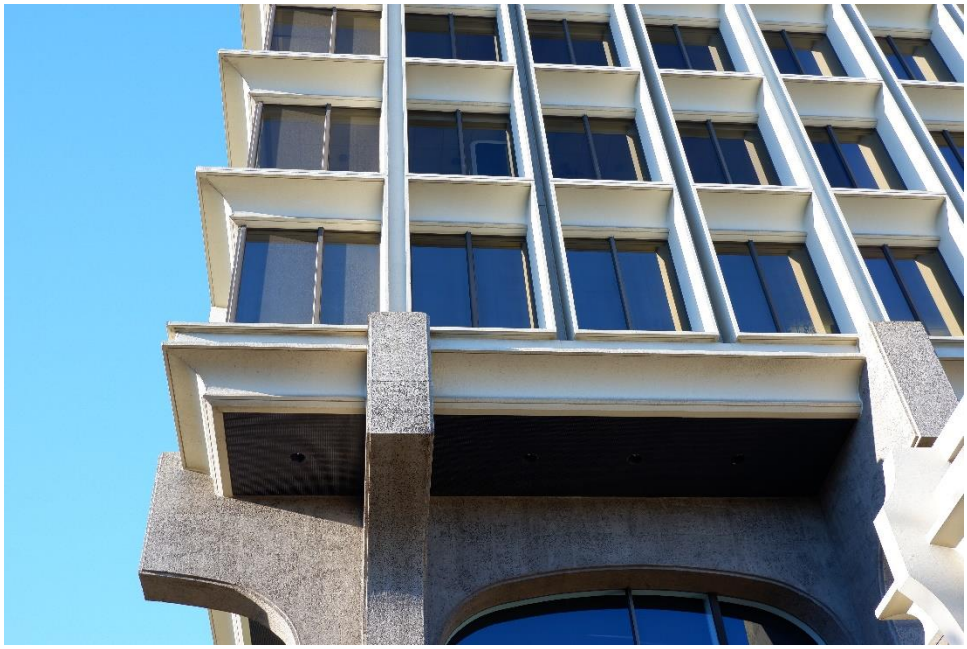

Figure 17. Typical windows at the office tower shaft.

PENTHOUSE

The 15th story of the office building features a penthouse, which is surrounded by an open brick deck on all four sides. Each of the six full height window bays on each of the four facades has a vertically oriented tripartite window or sliding door. A parapet above the 14th story of the tower shaft surrounds the deck at the patio level. The roof of the penthouse has a deep cantilever with vaulted ceilings at each window bay, and the exposed beams project out beyond the roof edge **(Figure 18)**. A metal safety railing has been installed around the perimeter of the penthouse roof, and a rectangular mechanical penthouse with attached telecommunication equipment is located at the center of the penthouse roof **(Figure 1 and Figure 3)**.

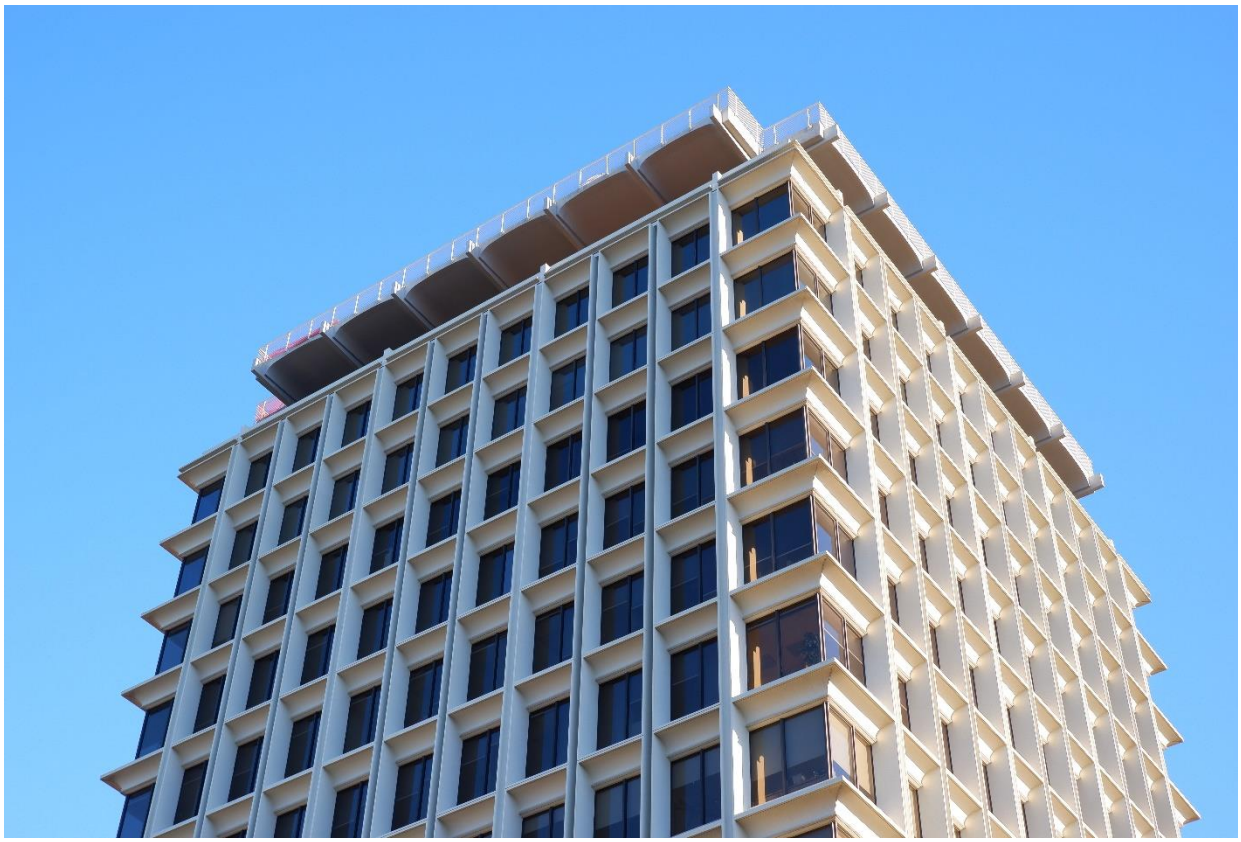

Figure 18. Cantilevered penthouse roof at the 15th story of the office tower.

North Wing

The North Wing of the Palo Alto Office Center is a two-story reinforced concrete building with a rectangular footprint, capped by a flat roof **(Figure 19 and Figure 20)**. The Late Modernist style building is characterized by matching, highly regular facades with thin, double-height repeating concrete columns. The base of the North Wing has a curved concrete sill that projects outward at

the bottom, and the second story is capped by a similarly curved concrete cornice that projects out at the top. Above the cornice is a recessed concrete parapet and railing. Each of the concrete columns that divide the regular window bays extends through the base and cornice. The top of each column is fin-like with a shaped, curved projection at the cornice.

Each typical window bay at the North Wing has a bronze anodized aluminum window with a single vertical muntin dividing two lites. The first-story windows are taller than those at the second story, and are separated by black granite panels framed in bronze anodized aluminum. At some bays, signs are mounted at the granite panels. The north and south facades of the North Wing each have 14 window bays, and the east and west facades each have four typical bays. At each of the four corners of the building are half window bays that meet with fillet corner joints **(Figure 21)**.

Figure 19. North (left) and west (right) facades of the North Wing, looking southeast.

Figure 20. East and north facades of the North Wing, looking southeast.

Figure 21. Curved concrete base and fillet joint corner at windows.

The exterior entrances to the North Wing are all located on the south façade of the building. The first bay of the south façade from the west (left) features fixed full-height glazing, and a paired fully glazed door with two transom lites is located at the second bay **(Figure 22)**. The third and fourth bays are clad with granite panels and have no window or door openings. Another paired door is located in the fifth bay, and granite panels clad the second story level **(Figure 23)**.

Figure 22. Doorways at south façade of the North Wing, looking northeast.

Figure 23. Non-original doors at the fifth bay from the west on the south façade.

The 14th bay has a replacement paired glass door with a single glazed transom at the first story **(Figure 24)**. The North Wing is connected to the Office Tower by an enclosed pedestrian bridge at the second story of the 14th bay **(Figure 25)**. The pedestrian bridge has black granite panel cladding below bronze anodized frame windows. The bridge has a cornice and top rail similar to the North Wing. The underside of the bridge is stuccoed with recessed can lights.

Figure 24. Doorway into North Wing below the enclosed pedestrian bridge.

Figure 25. Enclosed pedestrian bridge connecting Office Tower (left) and North Wing (right) at second story.

South Wing

The South Wing, like the North Wing, of the Palo Alto Office Center is a two-story reinforced concrete building with a rectangular footprint, capped by a flat roof **(Figure 26)**. The Late Modernist style building matches the South Wing in style, design, and materials, but has a wider footprint. The north and south facades of the North Wing each have 14 window bays, and the east and west facades each have six window bays. The window bays at the South Wing generally match the North Wing, except that all of the first-story openings at the east and south facades are clad in black granite panels, including at the southeast corner. Several signs are mounted at the granite panels between the first- and second-story windows. The primary entrance to the South Wing is located at the east façade and features paired, fully glazed doors at the center two bays with narrow outer sidelites and transoms. Above each door is a vertically corrugated metal panel **(Figure 27)**.

Figure 26. East façade of the South Wing.

Figure 27. Corrugated metal panels over the doors.

In addition to all the first-story bays along the south façade, the five westernmost (left) bays are also clad in granite panels at the second story **(Figure 28)**. A light fixture, metal box, and boarded opening are located at the fourth bay from the east (right) at the south façade, and appears to have formerly contained an inset ATM **(Figure 29)**. The west façade has all typical windows and no doorways.

Figure 28. South façade of the South Wing, looking northwest.

Figure 29. Former ATM location at the fourth bay from the east (right) on the south façade.

The South Wing is connected to the Office Tower by an enclosed pedestrian bridge at the second story of the second bay, and features a matching design to the bridge at the North Wing **(Figure 30)**. A typical first-story window is located below the bridge at the second bay of the South Wing. Paired, fully glazed doors with a single lite transom are located at the tenth bay of the south façade. Granite panels clad the second floor of the tenth bay, as well as the first and second stories of the 11th and 12th bays. At the 13th bay is a single fully glazed door with a wide sidelite and a single lite transom **(Figure 31)**.

Figure 30. Pedestrian bridge at second bay of the south façade.

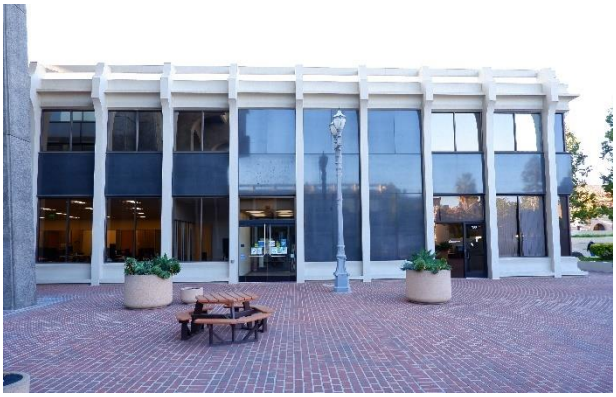

Figure 31. Doorways at the tenth and thirteenth bays of the south façade.

Site Features

The subject site is characterized by brick paving throughout, and has a hardscaped open area along the sidewalk on University Avenue as well as a rear plaza. The brick has been replaced with granite pavers in front of the two entrances to the Office Tower. A non-original, free-standing metal sign with a granite base sits at the southeast corner of the Office Tower base **(Figure 32)**. A square concrete planter features a free-standing metal sign at the northeast corner of the site **(Figure 33)**. Two generally circular concrete planters with integrated benches and metal signs are located at the southeast corner of the North Wing and the northeast corner of the South Wing **(Figure 34)**. At the southeast corner of the site, near the South Wing, is a square concrete planter with a circular element at the northeast corner featuring a cluster of boulders **(Figure 35)**.

Figure 32. Original brick paving (right) and replacement granite paving (left), with free-standing sign at southeast corner of the Office Tower.

Figure 33. Concrete planter and sign at the northeast corner of the site.

Figure 34. One of two generally circular planters with integrated benches.

Figure 35. Square planter with inset circular feature and boulder cluster east of the South Wing.

Moveable, circular concrete planters are located at various locations along the University Avenue frontage of the site.

Rear Plaza

The rear plaza is a tiered plaza with mostly brick paving that extends to the west end of the site. The lower level of the plaza features large and small moveable circular concrete planters **(Figure 36)**. The 12 large planters are presently arranged in a grid, with six circular picnic tables staggered between. One large rectangular concrete planter is located west of the North Wing, and two smaller rectangular planters are located west of the South Wing **(Figure 37)**. The planters have specimen trees and ground cover, as well as small shrubs surrounding air vents.

Figure 36. Lower level of the rear plaza, featuring brick paving and circular concrete planters.

Figure 37. The large concrete planter west of the North Wing.

A former fountain is now used as a planter at the center, west end of the lower level **(Figure 38)**. Low concrete walls have red brick caps, and a wall that encloses a staircase at the upper level is clad with blue tile. The staircase is surrounded by a metal railing and leads to the underground parking garage, but is permanently locked **(Figure 39)**. The upper plaza around the stair is enclosed by square wood beams.

Figure 38. Former fountain at the lower level of the rear plaza.

Figure 39. Upper level staircase to the underground parking garage.

Wide brick staircases flank either side of the former fountain. At the upper level of the plaza, between the stairs, there is a concrete building with a square footprint that once housed an elevator accessing the parking garage below. The structure has concrete columns that match the design of those at the North and South Wing. Half of the structure is enclosed with no openings, and the other half is open. The flat roof of the open section has blue tile at the ceiling and is supported by one column **(Figure 40 and Figure 41)**.

Figure 40. North side of the elevator structure, looking southeast.

Figure 41. South side of the elevator structure, looking northeast.

While the area around the elevator structure is brick, much of the upper plaza is paved in scored concrete. A low square planter is located north of the elevator structure, and a variety of low, rectilinear concrete planters are located around the perimeter of the upper plaza **(Figure 42)**. Most of the planters have specimen trees and low shrubs, but several are currently unplanted and only have a layer of mulch. Several concrete benches are located near the edges of the upper plaza

(Figure 43). Immediately west of the upper plaza is the driveway of the adjacent property at 530 Lytton Avenue.

Figure 42. Low planters along the west edge of the upper plaza, looking southeast toward the adjacent building at 530 Lytton Avenue.

Figure 43. Concrete bench at the upper plaza.

Parking Garage

Below the rear plaza is a three-story underground parking garage that serves both the subject property and the adjacent property at 530 Lytton Avenue. The garage has entrances at Tasso and Cowper streets which lead below the upper plaza of the subject property **(Figure 44)**. The garage is of concrete construction with a waffle slab ceiling, and is generally unfinished as is typical of underground parking garages **(Figure 45)**.

Figure 44. Cowper Street entrance to the parking garage, below the upper plaza.

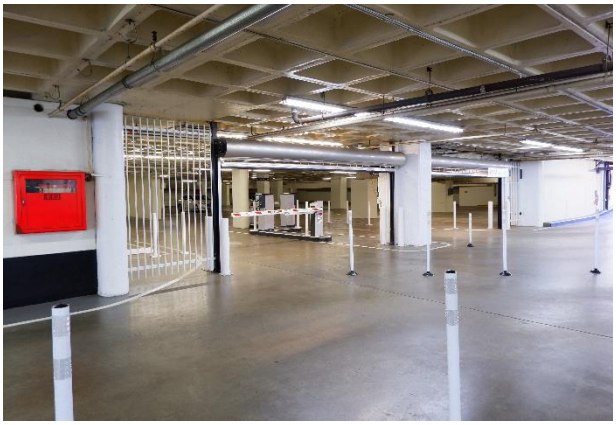

Figure 45. Underground parking garage with concrete waffle slab ceiling.

Surrounding Neighborhood

The subject property is located in the Downtown North neighborhood, and fronts the commercial corridor of University Avenue **(Figure 46)**. The buildings along University Avenue include retail, hotel, and mixed use buildings that are between one and six stories in height and represent a range of architectural styles and construction eras from the early 20th century to 21st century **(Figure 47)**. Commercial buildings are also located along Cowper and Tasso streets, facing the subject property. Three early 20th century two-story, single family residential buildings are located on the north side of Tasso Street, near Lytton Avenue. A three-story office building, constructed in 1975, at 530 Lytton Avenue occupies the remainder of the block west of the subject property **(Figure 48)**. West of Lytton Avenue is a residential neighborhood characterized by detached single-family homes and tree-lined streets **(Figure 49)**.

Figure 46. Commercial corridor along the east side of University Avenue.

Figure 47. Hotel President at the corner of University Avenue and Cowper Street.

Figure 48. Commercial building at 530 Lytton Avenue, looking northeast from intersection with Cowper Street.

Figure 49. Tree-line residential street on Lytton Avenue.

IV. HISTORIC CONTEXT

Palo Alto History

The earliest known settlement of the Palo Alto area was by the Ohlone people. The region was colonized in 1769 as part of Alta California. The Spanish and Mexican governments carved the area into large ranchos which contained portions of land that became Palo Alto including Rancho Corte Madera, Rancho Pastoria de las Borregas, Rancho Rincon de San Francisquito, and Rancho Riconada del Arroyo de San Francisquito.[5] These land grants were honored in the cession of California to the United States, but parcels were subdivided and sold throughout the nineteenth century.

The current city of Palo Alto contains the former township of Mayfield, which was located just southwest of Alma Street, and was established in 1855. Starting in 1876, the railroad magnate and California politician Leland Stanford began to purchase land in the area for his country estate, and in 1882 he purchased an additional 1,000 acres adjacent to Mayfield for his horse farm.[6] Stanford's vast holdings became known as the Palo Alto Stock Farm. On March 9, 1885, Stanford University was founded on land of the Palo Alto Stock Farm through an endowment act by the California Assembly and Senate.

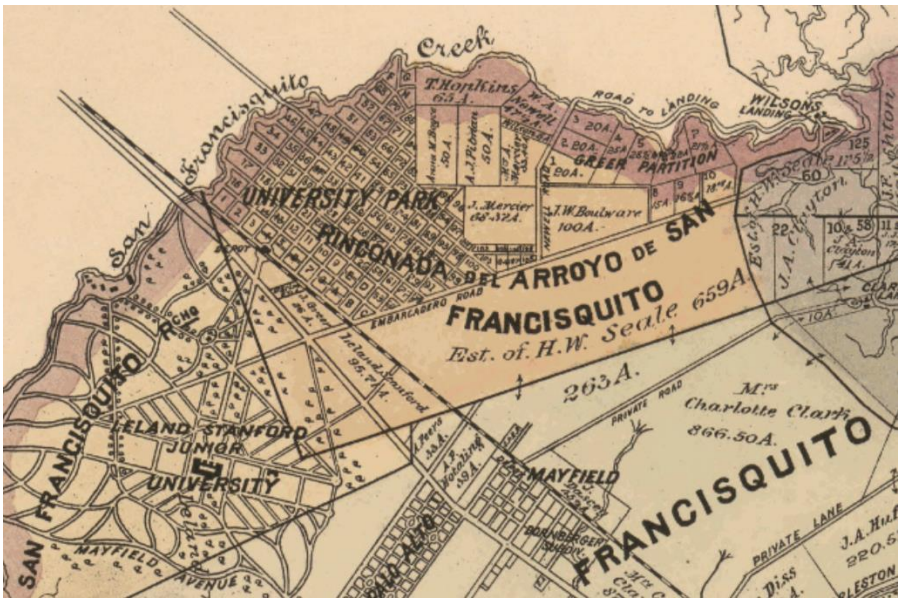

Figure 50. Detail of "Official Map of Santa Clara, California" by Herrmann Brothers, 1890. Note that University Park on this map is present day Palo Alto. Source: Library of Congress.

[5] Ward Winslow and Palo Alto Historical Association, *Palo Alto: A Centennial History* (Palo Alto, CA: Palo Alto Historical Association, 1993), 12-17.
[6] Ibid, 35.

Originally looking to connect Stanford University as a part of the already established town of Mayfield, Stanford asked residents of Mayfield to make the town a temperance town. Their refusal in 1886 caused Stanford to found the town of Palo Alto with aid from his friend, Timothy Hopkins of the Southern Pacific Railroad. Hopkins purchased and subdivided 740 acres of private land, that was known initially as University Park (or the Hopkins Tract) **(Figure 50)**.[7] This land was bounded by the San Francisquito Creek to the north and the railroad tracks and Stanford University campus to the south. A new train stop was created along University Avenue and the new town flourished in its close connection with the university. University Park, under its new name of Palo Alto, was incorporated in 1894.

In its early years, Palo Alto was a temperance town where no alcohol could be served. The residents were mostly middle and working class, with a pocket of University professors clustered in the neighborhood deemed Professorville. The development of a local streetcar in 1906, and the interurban railway to San Jose in 1910, facilitated access to jobs outside the city and to the University, encouraging more people to move to Palo Alto.[8] In July 1925, Mayfield was officially annexed and consolidated into the city of Palo Alto.[9]

Like the rest of the nation, Palo Alto suffered through the Great Depression in the 1930s and did not grow substantially. World War II brought an influx of military personnel and their families to the Peninsula; accordingly, Palo Alto saw rapid growth following the war as many families who had been stationed on the Peninsula by the military, or who worked in associated industries, chose to stay. Palo Alto's population more than doubled from 16,774 in 1940 to 52,287 in 1960.[10]

Palo Alto's city center greatly expanded in the late 1940s and 1950s, gathering parcels that would house new offices and light industrial uses and lead the city away from its "college town" reputation. Palo Alto annexed a vast area of mostly undeveloped land between 1959 and 1968. This area, west of the Foothill Expressway, has remained protected open space. Small annexations continued into the 1970s, contributing to the discontinuous footprint of the city today. Palo Alto remains closely tied to Stanford University; it is the largest employer in the city. The technology industry dominates other sectors of business, as is the case with most cities within Silicon Valley. Palo Alto consciously maintains its high proportion of open space to development and the suburban feeling and scale of its architecture.[11]

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[7] City of Palo Alto, *Comprehensive Plan 2030* (adopted by City Council, November 13, 2017), 16, accessed online November 30, 2020, https://www.cityofpaloalto.org/civicax/filebank/documents/62915.
[8] Dames & Moore, "Palo Alto Historic Survey Update," 1-4.
[9] City of Palo Alto, *Comprehensive Plan 2030*, 16.
[10] "City of Palo Alto, Santa Clara County," Bay Area Census, accessed August 27, 2019, http://www.bayareacensus.ca.gov/cities/PaloAlto50.htm.
[11] City of Palo Alto, *Comprehensive Plan 2030*, 11-20.

Downtown North Neighborhood

The current Downtown North neighborhood is located in the northern portion of the original University Park tract platted by Timothy Hopkins. It was the core part of the early city, along with today's University South neighborhood. The neighborhood is bounded by Alma Street to the south, San Francisquito Creek to the west, Middlefield Road to the north, and University Avenue to the east. University Avenue, which has historically been the main commercial corridor in Palo Alto, divides the Downtown North and University South neighborhoods. The 1895 Sanborn Fire Insurance Company map illustrates that stores were located along University Avenue and were particularly concentrated at its southwestern end, near the railroad, where a large lumberyard stood **(Figure 51).** Residences were scattered along the street just east and west of University Avenue on Hamilton and Lytton Avenues. A few churches, hotels, and boarding houses also stood among many vacant lots.

Figure 51. 1895 Sanborn Fire Insurance Co. map of Palo Alto showing the street layout within the core of the city. The future location of the subject property is marked by the red star.
Source: Digital Sanborn Maps, San Francisco Public Library

By 1901, Palo Alto had grown beyond its original core. Houses filled in the lots on the blocks around the railroad, while scattered residential development extended up to and beyond Middlefield Road. Institutions, such as schools and Palo Alto's first public library, had been built in the area. As noted earlier, the development of the streetcar in 1906 and later the interurban rail in 1910 along University Avenue helped spur commercial development. The relocation of displaced San Francisco residents following the 1906 earthquake to surrounding towns such as Palo Alto also resulted in increased residential and commercial development. During the first decade of the 20th century, the residential area of Downtown North appears to have been built out with one- and two-story

residences, but as the downtown commercial area prospered and expanded, and the University Avenue corridor became a desirable location for the growth of Palo Alto's commercial interests.[12]

In the post-World War II period, Palo Alto's population boomed and the city annexed more land, resulting in the construction of additional smaller commercial hubs which dissipated some of the concentration of commercial activity on University Avenue and Downtown North. During this period, some of the commercial development along University Avenue spread out onto perpendicular streets toward Lytton, replacing earlier residential buildings.

In 1961, the City of Palo Alto retained the Los Angeles-based architecture and planning firm Charles Luckman Associates to produce a city master plan as well as a "precise plan for the revitalization and development of the University Ave. business district in light of economic and physical conditions, trends and projects."[13] According to one account in the *San Francisco Examiner*, the "Luckman plan was pretty spectacular. It foresaw University Ave., Palo Alto's main business street turned into a mall, replete with boutiques, flower kiosks, double-decked parking buildings, and a couple of submerged cross-arteries."[14] In addition to a proposed marina with bayfront luxury apartments, the plan also proposed reusing the recently constructed Palo Alto City Hall and Library as a cultural center. City staff were upset with this latter part of the plan and downtown merchants were unhappy with the fact that their property could be condemned for the improvements. As a result, the City of Palo Alto shelved the Luckman plan and instead officially instituted a previously unadopted 1955 plan, developed by city staff.[15]

The controversy over the Luckman plan foreshadowed the anti-growth sentiments that burgeoned in Palo Alto throughout the 1960s and early 1970s. Many cities throughout the Bay Area during this period were having conversations about redevelopment, density, height limits, and historic preservation. Fears of "Manhattanization" or urbanization of the suburbs grew in Palo Alto, and "in the 1960s and early '70s, anti-growth "residentialists" took control of the city and scuttled other gargantuan projects in the works—notably, an 18-story hospital project in 1970 and the twin-towered "Superblock" commercial project the following year. By 1974, a residentialist-dominated city council had put a 50-foot height restriction on all Palo Alto buildings."[16] As a result, the Palo Alto Office Center remains the tallest building in Palo Alto at 237 feet tall; the few other high-rises that

[12] The 1924 Sanborn Map shows a variety of uses including a mixture of dwellings, stores, institutional, and light industrial uses.
[13] "Luckman to Do Master Plan for Palo Alto," *Los Angeles Times*, March 19, 1961.
[14] "Palo Alto 'Plan' Is Tossed Out," *San Francisco Examiner*, October 1, 1962.
[15] "Palo Alto 'Plan' Is Tossed Out," *San Francisco Examiner*, October 1, 1962.
[16] Matt Bowling, "Office building sign of another era," *Palo Alto Daily News*, October 28, 2007.

predate the height limit include Palo Alto Square (3000 El Camino Real) at 143 feet, Channing House (850 Webster Street) at 142 feet, and Palo Alto City Hall (250 Hamilton Avenue) at 122 feet.

Late Modern Architectural Style

Late Modernism is a broad term that encompasses the varied designs of the 1960s and 1970s within the Modern Movement when backlash against the perceived uniformity and repetitiveness of International Style architecture inspired many architects to explore other architectural forms.[17] Theorist and architectural historian Charles Jencks was one of the first to codify the term "Late Modern" as an architectural style and observed, "There are many ways to characterize Late-Modern architecture and most of them can be reduced to the single notion of exaggeration. Late-Modernism takes Modern architecture to an extreme to overcome its monotony and the public's boredom with it."[18] Some architects drew inspiration from historic architectural examples, giving way to New Formalism and eventually Postmodernism. Others pushed the modern aesthetic to new extremes through advancements in technology, engineering, and materials, leading to Brutalism, Expressionism, and High-Tech Structuralism. Still others transformed the glass-and-steel look into taut glass skin and mirror glass designs, or alternatively, incorporated organic materials and shapes for a more natural, wooded aesthetic. Late Modernism essentially hybridized established Modern rationale and functional forms with aspects of the emerging architectural stylistic trends that would gain prominence from the 1960s through the 1980s.

Because of this interplay of varied forms within a clearly Modern vocabulary, Late Modernism is difficult to define. This is exacerbated by the number of subgenres like traditional Modernism, New Formalism, Brutalism, and Expressionism that have their own defining characteristics; some Late Modern examples feature elements of these styles in various combinations. Typically, Late Modern commercial, institutional, and government buildings were often monumental in scale, have sculptural qualities within the design, including strong linear elements, pronounced structural components, and interplay of plans or volumes, and comprehensive landscape design in plantings, paving, and features to create a cohesive setting.

Some common elements often incorporated into Late Modern buildings include:

- Strong geometric forms
- Glazed and solid components

[17] Kazys Varnelis, "Embracing Late Modern," *L.A. Forum*, accessed December 2, 2020, http://laforum.org/article/embracing-late-modern/.
[18] Charles Jencks, *Architecture Today* (New York: Harry N. Abrams, Inc, Publishers, 1988) cited in "Los Angeles Citywide Historic Context Statement: Architecture and Engineering/LA Modernism/Late Modern, 1966-1990," SurveyLA, prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources (July 2020), 2.

- Linear accents
- Symmetrical and/or modular composition
- Integrated structural elements
- Industrial materials
- Aluminum floor-to-ceiling glazing systems at the ground floor
- High quality materials at the ground floor
- Colored glazing treatments
- Flexible interior spaces
- Climate controlled environments

Practitioners of the Late Modern style included celebrated architects of the Modern Movement at the next phase of their careers experimenting with new forms, such as Marcel Breuer, Louis Khan, and William Pereira, as well as those that were trained modernists but eventually rejected orthodox Modernism, such as Philip Johnson and Cesar Pelli. Examples of Late Modernism in the Bay Area include office tower projects such as the Transamerica Pyramid (1972) in San Francisco by Pereira, the Embarcadero Center (1971-82) in San Francisco by John Portman, the Kaiser Center in Oakland by Welton Beckett (1960), and the Ordway Building in Oakland by Skidmore, Owings & Merrill (1970) **(Figure 52 - Figure 54)**.

Figure 52. Transamerica Pyramid in San Francisco by William Pereira, completed in 1972.

Figure 53. The Embarcadero Center in San Francisco by John Portman, completed 1971-82.

Figure 54. Kaiser Center (center) designed by Welton Beckett in 1960 (center) and Ordway Building (immediately right of Kaiser Center) designed by Skidmore, Owings & Merrill in 1970. Source: Wikimedia.

In Palo Alto, examples of Late Modernist commercial and institutional buildings include the subject property at 525 University Avenue; the adjacent property at 530 Lytton Avenue; the Palo Alto City Hall (250 Hamilton Avenue), designed by Edward Durrell Stone in 1967; the commercial building and round pavilion at 151 University Avenue, built in 1964; and the six-building campus with two 10-story towers at Palo Alto Square (3000 El Camino Real), designed by Albert Hoover in 1972 **(Figure 55 - Figure 58)**.

Figure 55. 530 Lytton Avenue, Palo Alto, completed in 1975.

Figure 56. Postcard of Palo Alto City Hall by Edward Durrell Stone, completed in 1967. Source: Flikr.com.

Figure 57. 151 University Avenue, Palo Alto, completed in 1964. Source: LoopNet.com

Figure 58. Palo Alto Square, 3000 El Camino Real, designed by Albert Hoover in 1972. Source: Hudson Pacific Properties.

Tallie Maule, Architect

Tallie Burton Maule (1917-1974) was born in Sand Spring, Oklahoma and received his Bachelor of Architecture degree from Oklahoma State University in 1940.[19] After serving in the United States Navy in World War II, Maule went on to receive the Lowell Palmer Fellowship and a Master of Fine Arts in architecture at Princeton University in 1948. Maule also received the American Academy in Rome fellowship in 1951 and a Fulbright scholarship. While still a student, Maule began working for the architecture firm Skidmore, Owings & Merrill, and between 1947 and 1955, worked as an associate in a number of the firm's offices, including New York; Chicago, Oakridge, Tennessee; Tokyo; and then San Francisco. Maule returned to Japan to design pilot projects for a United States Army postwar building program for about four years.

Following this stint abroad, Maule moved to San Francisco and opened his own practice, which he ran from 1957 until his death in 1974. Perhaps Maule's longest standing project, and certainly most well-known, was as Chief Architect of Design Coordination for the Bay Area Rapid Transit (BART) Agency from 1966 to 1973. While the BART stations where designed by a variety of architects, Maule oversaw the design and construction of all the stations and had a heavier hand in the design of the Embarcadero Station, which was added into the system later in the planning process, where he worked with the firm Hertzka & Knowles & Associates **(Figure 59)**. Although the BART system initially opened in 1972, Maule died before the Embarcadero BART station was opened and is memorialized in a granite relief portrait by William Cullen in the station **(Figure 60)**.[20] The BART system won a

[19] Unless otherwise stated, this biography of Tallie Maule is adapted from information in "Tallie Maule (1917-1974)," University of California, Berkeley, Environmental Design Archives, accessed online November 25, 2020, https://archives.ced.berkeley.edu/collections/maule-tallie.

[20] "BART Station Bas-relief Honors Architect Maule," *AIA Journa*l (November 1976), 106.

number of awards, including the top award for design excellence from the United States Housing & Urban Development (HUD) Department in 1968.[21]

Maule's expertise with transit design and planning also resulted in roles as a consulting architect for the Metropolitan Atlantic Rapid Transit Authority (MARTA) in Atlanta and the Metro in Sao Paolo, Brazil. His other notable projects included the Palo Alto Office Center, Sunnyvale Office Center (c. 1960), and the West Portal Transit Station (c. 1970), which is part of San Francisco's Municipal (Muni) transit system **(Figure 61)**. The archive of Maule's work, held at the University of California, Berkeley Environmental Design Archives, reveals a few residential projects, but the majority of Maule's work was on large scale transportation infrastructure, civic, institutional, and commercial projects. In addition to being a member of the American Institute of Architects, Maule was a member of the Greater San Francisco Chamber of Commerce.

Figure 59. Embarcadero BART station designed by Tallie Maule and Hertzka & Knowles.
Source: University of California, Berkeley Environmental Design Archives.

[21] "Maule, Tallie Burton," AIA American Architects Directory (1970), 608; and "BART Architect Succumbs To Heart Attack," *Petaluma Argus-Courier*, June 19, 1974.

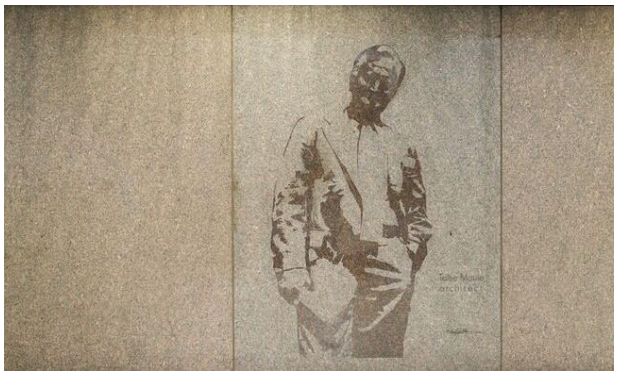

Figure 60. Portrait of Tallie Maule by William Cullen in the Embarcadero BART station. Source: Felicia Kiesselhorst, bartable.bart.gov.

Figure 61. Sunnyvale Office Center at 505 West Olive Avenue, Sunnyvale, designed by Tallie Maule. Source: CommercialEdge.

V. SITE HISTORY

Site Development

The subject property at 525 University Avenue spans about two-thirds of the city block bounded by University Avenue, Cowper Street, Lytton Avenue, and Tasso Street. This block was about two-thirds developed with one- and two-story wood residential buildings by 1908 and was fully developed except for one lot on University Avenue by 1949 **(Figure 62)**. At the northeast and southwest corners of the blocks were multi-unit apartment buildings. In 1953, the real estate firm of Hare, Brewer & Kelley remodeled the two-story apartment building at 525 University Street to become their new offices.[22] The firm, which is discussed in more detail in the following 'Ownership and Occupant History' section, grew over the following decade, requiring larger offices. Furthermore, the company saw an investment opportunity in the downtown site on Palo Alto's main commercial thoroughfare and purchased all of the parcels on the block. In 1963, Hare, Brewer, & Kelley moved their offices across the street to 530 University Avenue and physically relocated their former office building to a new location at Hamilton Avenue and Middlefield Road to be leased to new tenants **(Figure 63)**.[23] Soon after, some 12 homes, an apartment building, and several small office buildings were demolished to clear the block for redevelopment.[24]

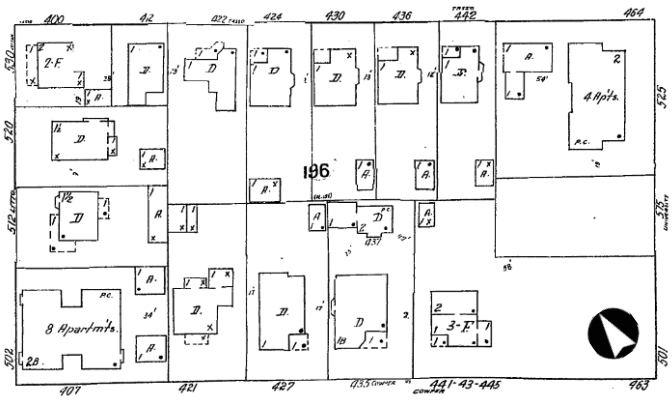

Figure 62. 1949 Sanborn Map Company fire insurance map showing block bounded by University Ave, Cowper St, Lytton Ave., and Tasso St. Apartment building at northeast corner was later used as offices by Hare, Brewer & Kelley. Source: San Francisco Public Library. Edited by Page & Turnbull.

Figure 63. Former office of Hare, Brewer & Kelley, originally located at 525 University Avenue, being relocated to make room for Palo Alto Office Center. Source: "Big moving job," *Palo Alto Times*, December 31, 1963.

[22] "Palo Alto Firm at new offices," *Palo Alto Times*, November 16, 1953.
[23] "Hare, Brewer & Kelley moving to new headquarters," *Palo Alto Times*, October 25, 1963.
[24] "Big moving job," *Palo Alto Times*, December 31, 1963.

Hare, Brewer & Kelley's venture at 525 University Avenue was originally called the United California Bank Building (or UCB Tower), after the first anchor tenant, but soon became commonly known as the Palo Alto Office Center. Developers like Hare, Brewer & Kelley saw an opportunity to build up Palo Alto as the banking and business center of the Peninsula as Silicon Valley boomed with rapid growth in electronic, aerospace, and biotechnology firms, as well as what one advertisement called "PhD industries," such as publishing firms like Sunset Magazine, insurance companies, and data centers of national companies like Shell Oil.[25] Proximity to Stanford University and Stanford Research Park, the Stanford Linear Accelerator Center (SLAC), NASA Moffett Field, and transit including highways and airports, was seen as promising for the development of new suburban corporate office space.

Hare, Brewer & Kelley hired architect Tallie Maule to design a plan for the full city block, with the architectural brief "to create an 'office center' in which the various participating businesses could maintain their identity," including facilities for a bank, the main offices of the client's firm, a men's club, and 120,000 square feet of leasable office space.[26] Maule designed a site plan for two high-rise towers, six one- and two-story low-rise buildings, and three levels of underground parking **(Figure 64)**.[27] Roof terraces are mentioned in early descriptions of the project and shown in some early concept sketches, but were never implemented **(Figure 65)**. The floor plans for the office tower were designed to be efficient and modular with open plans around a central elevator core for maximum flexibility for office tenants.[28] Prior to construction, the design received *Progressive Architecture* magazine's 1964 Citation of Merit. The jury comment stated, "Though the jury admired nearly all aspects of this building—the disposition and expression of the many necessary elements, the plan, the mechanical system, the architecture of the tower portion—they voiced strong reservations concerning 'the confusion between the arch and the cantilever principle,' evident in the base of the tower."[29]

[25] "Palo Alto: a unique location for modern industry and commerce," *Palo Alto Times*, December 9, 1966; and David Hoye, "Reaching the heights in Palo Alto," *Times Tribune*, July 13, 1987.
[26] "Citation: United California Bank Building, Palo Alto, California," *Progressive Architecture* 45, no. 1 (January 1964), 122.
[27] Maule worked with structural engineer, Isadore Thompson, and mechanical and electrical engineers, Ackerman & Aronoff.
[28] "Space Division," *Palo Alto Times*, December 9, 1966.
[29] "Citation: United California Bank Building, Palo Alto, California," *Progressive Architecture* 45, no. 1 (January 1964), 122.

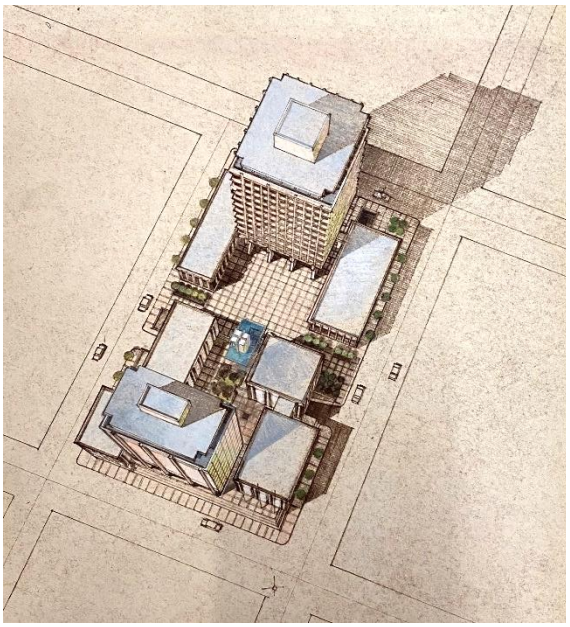

Figure 64. Bird's-eye view site plan of the subject property and unrealized additional buildings by Maule. Source: University of California, Berkeley, Environmental Design Archives.

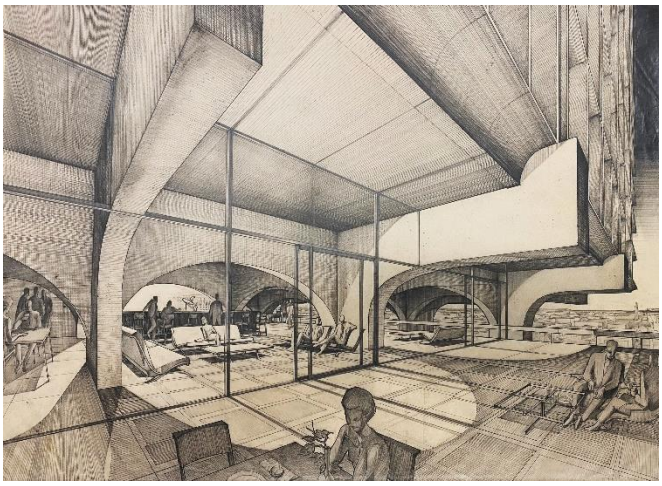

Figure 65. Rendering by Maule of unrealized roof terraces. Other design features shown, such as arched concrete columns and precast window screen, were constructed in the final design. Source: University of California, Berkeley, Environmental Design Archives.

While the full site plan was never realized, Phase One of the project, including the tower on University Avenue and two flanking low-rise wings were constructed based on a revised design by Maule that excluded roof terraces **(Figure 66)**. Ground-breaking occurred in December 1963 and initial construction in summer of 1964 when 100,000 cubic yards of earth was removed to pour the concrete mat foundation in a 35-foot-deep hole **(Figure 67)**.[30] By September 1966 the garage was open, elevators were working, garage open, and the first two tenants—Shell Oil Company's Data Division and Cupples Company, a manufacturing rep for paper products—moved in with the complex already 45 percent leased.[31] The western portion of the block, including portions of the upper terrace of the rear plaza, was left as a concrete slab for future development through at least 1968 before Hare, Brewer & Kelley abandoned hopes of their initial full-block plan **(Figure 68)**.

[30] General contractor was Johnson and Mape with Henry C. Beck Co; see, "$8.5 Million Bank Building Underway," *The Times*, August 12, 1964.
[31] "New 15-story Palo Alto Office Center comes to life," *Palo Alto Times*, September 26, 1966.

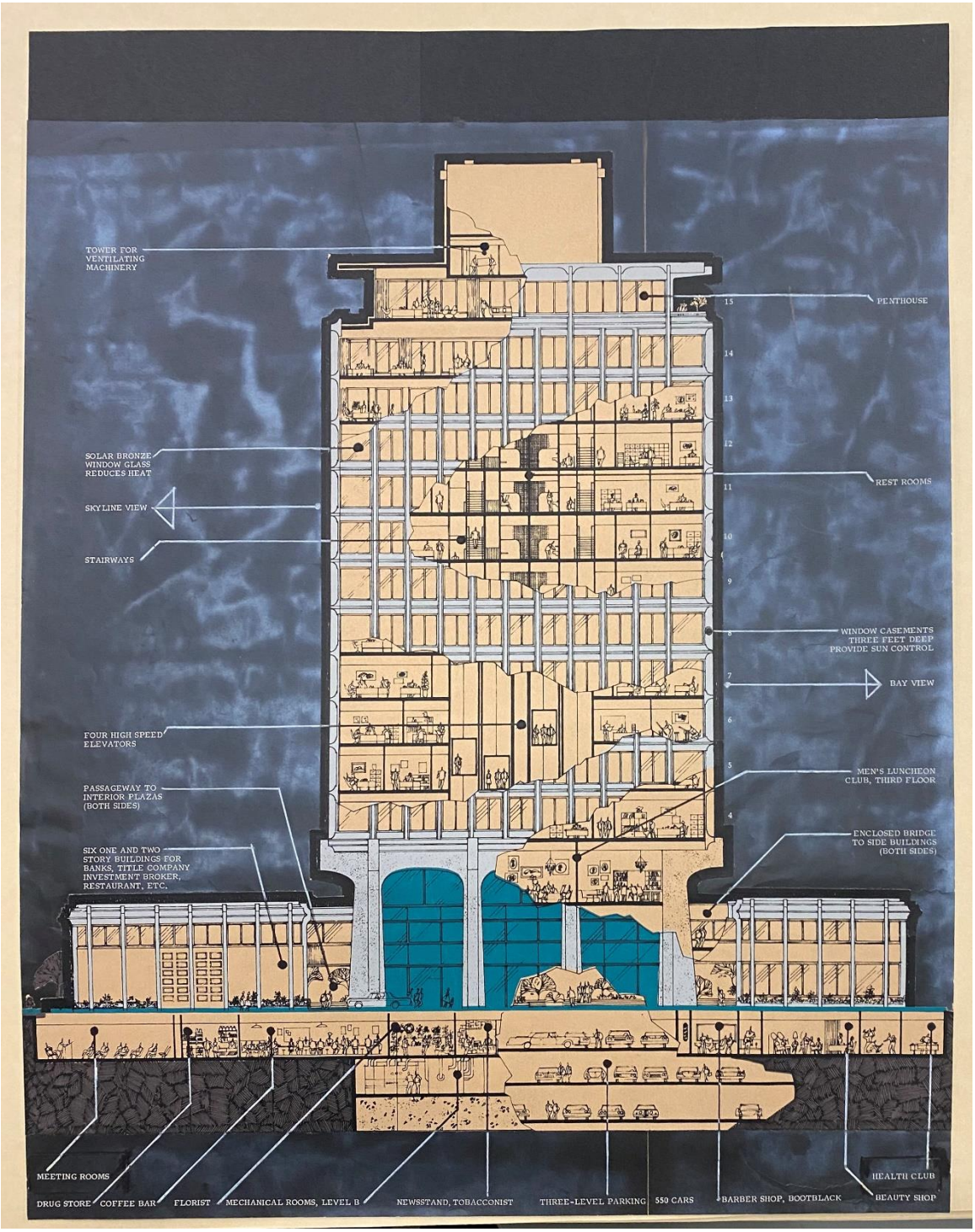

Figure 66. Section-elevation drawing by Maule of the three constructed buildings at Palo Alto Office Center. Source: University of California, Berkeley, Environmental Design Archives.

Figure 67. Construction of the Palo Alto Office Center tower base, circa 1965. Source: Palo Alto Historical Association.

Figure 68. 1968 aerial photograph of the Palo Alto Office Center. The western half of the site has a pad foundation for future development. Source: Flight CAS-2310, Frame 1-25, May 2, 1968, Cartwright Aerial Surveys, UC Santa Barbara Library FrameFinder.

When the Palo Alto Office Center was formally dedicated on December 9, 1966, at 15 stories and 237 feet tall, it was the tallest building between San Francisco-Oakland and Los Angeles **(Figure 69)**.[32] The arched, bush-hammered concrete columns of the tower base rise dramatically over the commercial corridor of University Avenue, set against the complimentary low-rise wings and brick paving which provide a more human scale to the complex **(Figure 70)**. The heavy repeating precast concrete panels surrounding the windows were designed by Maule to act as sunscreens at each interior office floor. The visual weight of these panels is tempered by the corner condition at each floor—the corner windows are abutting, without division by a precast panel—creating a visual cantilever effect. Each horizontal precast panel also has a gentle curve which references the dominant visual feature at the base: the arched concrete columns.

[32] "Palo Alto Office Area Near Finish," *Oakland Tribune*, May 22, 1966.

Figure 69. View of the Palo Alto Office Center looking east from the upper terrace of the rear plaza, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

Figure 70. Hare, Brewer & Kelley sign at the base of the Palo Alto Office Center tower, with the South Wing at the left, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

Throughout the design of the Palo Alto Office Center, Maule used features and materials—such as the curve of the three-point arch, brick, and bush-hammered concrete—to create a cohesive design at the exterior and interior of all three buildings. The brick paving at plaza and sidewalk along University Avenue extended into the lobby of the office tower building, and the concrete columns were exposed at the interior **(Figure 71)**. While softer materials such as wood paneling and what appears to be plaster were used at the walls and ceilings of the lobby elevator core, the wall opposite the elevators curved to meet the ceiling with the same arch as the exterior concrete columns. Bronzed handles, oriented like a sideways 'T,' at fully glazed lobby doors were also designed to complement this arched shape. While the facades of each of the two low-rise buildings were designed by Maule to have a very clear, repeating module, there are modules with black granite in place of typical windows, which reflects the interior function of the space—such as interior stairways at the North Wing or secure banking functions at the South Wing **(Figure 72)**.

Figure 71. Interior view of the elevator core in the lobby of the office tower, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

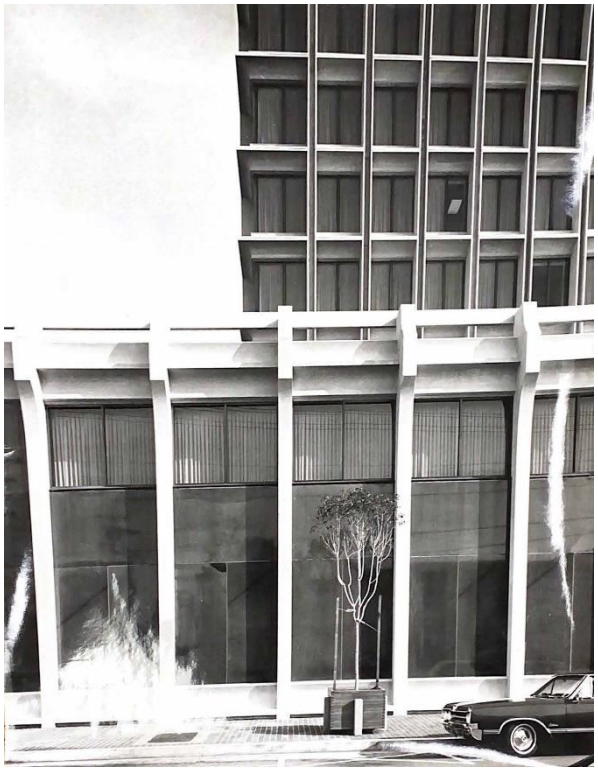

Figure 72. South façade of the South Wing, featuring black granite panels at the first floor due to interior banking function, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

Maule also designed interior for the United California Bank branch, located in the low-rise South Wing, which was described by a newspaper article as having a:

> […] luxurious interior, which will include such exotic decor as teakwood from Thailand. Total cost for the interior will be around a quarter-million dollars. […] Tall bronze doors lead from University Avenue into the new branch, where a spacious, quiet mood is enhanced by low, unobstructed teller's counters and a large administrative area carpeted in antique gold. Walls and counters are paneled in solid teak from Thailand, and the columns are also encased in teak. A unique feature inside is the black granite enclosed vault, which reflects the interior granite walls.[33]

Contrasting with the brick floor of the office tower lobby, the bank appears to have originally featured granite flooring **(Figure 73)**.

[33] "Striking Bank Interior Planed," *The Times*, July 22, 1966.

Figure 73. Interior view of United California Bank branch in the South Wing, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

Figure 74. South Wing and rear plaza planter, circa 1966. Source: University of California, Berkeley, Environmental Design Archives.

The rear plaza was named the "William Michael Kelley Memorial Plaza" in honor of the late president of Hare, Brewer & Kelley, who had been part of the project planning but had died in 1963. [34] The plaza was described at the time of dedication with high praise:

> The plaza is an area of restful pools, landscaping and contrasting architectural excitement. Walking into the inner court one appreciates the intimate charm of the lower plaza which connects to the upper plaza by a series of broad steps. Together these plaza areas occupy more than half of the city block which is the Office Center. Interest is heightened architecturally by arcades created by second-level overpasses between certain of the buildings. The total effect of the plaza with its many entrances from the street is not unlike that of plazas of beautiful old European cities. The plazas are places of rest, to sit, to see and to enjoy, both from the plaza level and from the surrounding buildings.[35]

[34] "Dedication…Office Center Plaza dedicated to William M. Kelley," *Palo Alto Times*, December 9, 1966.
[35] "Life at the Tower," *Palo Alto Times*, December 9, 1966.

At the upper level of the brick plaza, Maule had also designed a structure to house an elevator accessing the underground parking below, which features columns that match the low-rise buildings. Except for the brick paving immediately around the elevator structure and stair to the parking garage, the upper terrace remained unfinished until likely the early 1970s. Per Hare, Brewer & Kelley's original plans and the site plans designed by Maule, additional low-rise buildings would have been located at the upper terrace, but were ultimately never constructed. Hare, Brewer & Kelley instead divided the western most one-third of the block as a separate parcel for development, and the upper terrace was completed with brick paving and concrete planters to match the lower plaza.

However, some users would later complain that the plaza had a wind tunnel effect, making it too chilly to enjoy. Later owner C.M. Capital proposed several schemes in the 1990s that would have addressed this concern and provided additional square footage, including an atrium addition at the rear plaza and a new building that would have engulfed the plaza and site of the two low rise buildings. [36] However, these projects were never realized. Today, the office tower remains Palo Alto's tallest building due to height limits imposed in 1974.

CONSTRUCTION CHRONOLOGY

The following table provides a timeline of construction activity at 525 University Avenue, based on building permit applications on file with the Palo Alto Development Services. Cancelled, expired, and temporary permits are not included. Permits related to telecommunications installations on the roof are also not included.

Date Filed	Permit App. #	Owner	Applicant	Architect/ Designer	Description of Work
3/3/1975	C31629			Bud Moore	Sign, "Walk up window" and footprints
11/12/1976	P-7625		George Britt, QRS Corporation		Install non-illuminated plex. lettering on building.
2/6/1978	78-UP-4	C.M. Trading Co.	La Tour, Inc.		Sale of alcoholic beverages – use permit.
3/3/1978	PLN-603	Hare, Brewer & Kelley	Monterey Savings & Loan	William Concolino & Associates	Approval of signage on Palo Alto Office Center for Monterey Savings & Loan signs to identify 1st floor usage by Monterey Savings on University Ave.

[36] Peter Gauvin, "Remodeling ahead for 525 University," *Palo Alto Weekly*, June 5, 1996; and Peter Gauvin, "High-rise plans fall flat," *Palo Alto Weekly,* November 15, 1996.

Date Filed	Permit App. #	Owner	Applicant	Architect/ Designer	Description of Work
3/15/1978	PLN-1627	Bayshore Landmark N.Y.	La Tour, Inc.	Richard Elmore Design Ass.	3 restaurant identification signs on building. 3rd story level.
2/17/1981	81-ARB-41	United Cal. Bank	A.I.D.C.O.		Approval of installation of an automated teller machine.
3/11/1981	81-ARB-58	Bayshore Landmark N.Y.	W. Heath & Co., First Interstate Bank		Replace existing plex faces in existing signs and replace existing plaques with new flat cut out aluminum plaques per plans for signs "A thru F."
9/22/1981	81-ARB-203	Home Savings	George Britt, QRS Corporation		Sign approval
2/22/1984	84-ARB-48		Amcoe Sign Co.		Name change on existing free-standing sign: "Bache" to Prudential Bache Securities.
4/16/1985	85-ARB-94	Home Savings	Ad-Art Sign Co.		Replace existing signs (2) with new signs – old copy – "Home Savings." New copy – "Home Savings of America"
3/18/1986	86-ARB-68	Hare, Brewer & Kelley Inc.	Switzer Construction Inc.		Install new glass door and fixed glass sidelight where pair of fixed windows exist.
8/28/1987	87-ARB-210	Hare Brewer & Kelley Inc.	Switzer Construction Inc.		Install new glass door and fixed glass sidelight where pair of fixed windows exist.
8/21/1987	87-UP-033	C.M. Capital Corporation	Raji Azar		Sale of beer and wine
3/21/1988	88-ARB-64	Hare Brewer & Kelley Inc.		Gordon Williams Design	Review and approval of TSA, Inc. exterior sign proposal of 3/18/88 by the ARB and City of Palo Alto
4/26/1988	88-ARB-97	Hare Brewer & Kelley Inc.		William S. Douglas, Architect	Approval of proposed metal frame with marble inset blade style sign, dimensions 6'-6" wide x 1'-6" high x 1½" deep with the words "Hambrecht & Quist, Second Floor" inscribed in marble with gold leaf applied. Sign to be located on top of concrete tree planter, top of sign at +5'-0" above ground.
8/9/1989	89-ARB-193	C.M. Capital Corporation	C.M. Capital Corporation		Change the surface material on the walkways between buildings; install planters and

Date Filed	Permit App. #	Owner	Applicant	Architect/ Designer	Description of Work
					sign monument and glass canopies between buildings
10/10/1989	89-ARB-253	C.M. Capital Corporation	Imperial Savings		Installation of automated teller machine in existing exterior storefront wall
8/16/1991	91-ARB-109	C.M. Capital Corporation	Chadwick Hamilton		[...] The owner wishes to extend approval of the steel and glass canopy as a separately approved action by the ARB in order to complete this part of the original work at a later time.
10/15/1992	92-ARB-153	C.M. Capital Corporation		C. Homan Design	Construct redwood lattice screen at existing air conditioners at 2nd story roof
6/10/1993	93-ARB-110	C.M. Capital Corporation	J.H. Bryant, Brent Crabill		Install three fixtures on the exterior of the bank to comply with Senate Bill AB244 which deals with a minimum of light around the ATM
11/01/1995	95-ARB-228	C.M. Capital Corporation	Kevin E. Strong, Strong & Assoc, Inc.		Add +/- 3'-6" H. x 8'-0" W. with 6'-0" projection. Front solid valance is 2'-0" H. along Cowper St. near University Ave.
10/10/2000	00-ARB-147	Ernie Paez	Aaron Majors/ Gachina Landscape Management		Landscape plan approval
6/26/2003	03-ARB-57	Insignia / E.S.G.	Western Allied		Review & approve mechanical plans to modify outside air intake.
04/29/2005	05PLN-00154	CBRE	Sign Solutions Inc.		Non illuminated aluminum letters on aluminum panel attached to building.
7/25/2005	05PLN-00269	CBRE	Sign Solutions Inc.		Monument sign.
2/26/2007	07PLN-00066	Chris Boreta	Pro Signs, Inc.		New signs in existing wall sign locations – 3 florescent illuminated black aluminum sign cabinets with translucent red & white push through acrylic letters
8/2/2007	07PLN-00243	PAOC LLC	Alan Ford, Barbara Ford		Install two (2) sets of internally illuminated letters mounted on backer panel on wall and

Date Filed	Permit App. #	Owner	Applicant	Architect/ Designer	Description of Work
					two (2) internally illuminated window signs.
8/15/2008	08PLN-00000-00261	Chris Boreta		Kevin Mattos, Architect	Install safety guard rail at rooftop parapet.
9/16/2008	08PLN-00000-00292	PAOC, LLC		Artsigns Architectural	Install signs to the façade of the building.
3/31/2014	14PLN-00098	Chris Boreta	Paul Maynes		Replace sign face with new business, Guidebook. Same sign type & construction as previous
6/18/2014	14PLN-00218	PAOC, LLC	Juan Gonzalez, Adimpact		Installation of two (2) building identification signs with Push-Thru copy reading “California Bank & Trust” as per Adimpact drawings
11/7/2014	14PLN-00441	Stanford Federal Credit Union	Indian Ortega		Stanford FCU is changing its corporate logo in November 2014. We are requesting permission to change existing logo to the new logo located outside the building.
12/19/2017	17-PLN-00460	PAOC, LLC	Fastsigns		Fabricated and installed illuminated Push-thru letters

Known alterations that are not clearly stated in the permit table above include replacement of entry doors at various dates, remodel of the ground floor office tower lobby (which could be related to permitted work in 1989 involving the replacement of the floor material at the lobby entrances), and conversion of the fountain at the rear plaza to a planter sometime after 2005. Moveable outdoor furniture, such as benches and round picnic tables have been installed around the site. Early photos show square wood tree planters along Cowper Street, indicating that the movable round concrete planters may not be original to the site **(Figure 74)**. Limited available historic photographs indicate that the planters have likely been replanted over the years. The complex was LEED certified in March 2010.

Ownership and Occupant History

OWNERSHIP HISTORY

The subject property was owned and developed by the Palo Alto real estate development company Hare, Brewer & Kelley. In February 1968, just a few years after completion of 525 University Avenue,

the property was sold to Eldorado Insurance Co. of San Francisco, but Hare, Brewer & Kelley maintained full management and operational control of the complex.[37] The sale was made, at least in part, to provide finances for Hare, Brewer & Kelley to pursue construction of a second tower on the site, which never materialized. In late 1976, Eldorado Insurance Co. announced a potential sale to an undisclosed buyer, which may have been C.M. Capital Corporation. [38] A private investment company, C.M. Capital Corporation was established in 1969 in Palo Alto by the Cha family who established the Cha Group of affiliated companies in 1949 with Dr. Cha Chi Ming's China Dyeing Works.[39] Since about 2009, the property has been owned by PAOC, LLC.

Hare, Brewer & Kelley

Established in 1925 as Hare, Brewer, and Clark, the firm was soon joined by William M. Kelley (1895-1964), who would become president of the re-named firm after he acquired it in 1938.[40] Kelley was responsible for growing the subdivision arm of the company, building communities on the Peninsula such as Lindenwood, Crescent Park, Leland Manor, and Atherton Heights, as well as Ladera, a 525-home community in the hills west of Stanford University that the firm rescued from failure under the original developer.[41] Kelley was also instrumental in the development of the Palo Alto Office Center and Mayfield Mall—the first indoor shopping center in Mountain View—and served as chairman of the Palo Alto Planning Commission. The firm's portfolio included projects such as the 620-acre high-tech office park in Sunnyvale known as Moffett Park. Kelley's two sons, William K. and Ryland, took over the firm after his death in 1964. Ryland was the vice president of the firm during the development of the Palo Alto Office Center.

Originally located at 529 Ramona Street, the firm relocated its offices to a remodeled two-story residential building at 525 University Avenue in 1953.[42] They then temporarily located their staff of 50 across the street at 530 University Street while their new office tower complex at 525 University Avenue was under construction.[43] In the early 1960s, the firm took advantage of the growing Silicon Valley industries and associated residential and commercial development to create its own research and planning department "to supply information for its own developments, but also for outside small and medium-sized business concerns. Hare, Brewer & Kelley believe the department is the only one of its kind on the Peninsula, and certainly the only one which is part of a real estate firm."[44] However, by the late 1960s the sentiment of the "residentialist"-leaning City Council was against

[37] "Palo Alto Office Center Sold," *Palo Alto Times*, February 26, 1968.
[38] "Buyer found for building," *Palo Alto Times*, December 21, 1976.
[39] "About," CM Capital Corporation, accessed November 30, 2020, https://www.ccapital.com/.
[40] "Dedication…Office Center Plaza dedicated to William M. Kelley," *Palo Alto Times*, December 9, 1966.
[41] Sam Whiting, "Rye Kelley, dies at 88, key to developing downtown Palo Alto," *SFGate,* September 2, 2014.
[42] "Palo Alto Firm at new offices," *Palo Alto Times*, November 16, 1953.
[43] "Big moving job," *Palo Alto Times*, December 31, 1963.
[44] Paul Emerson, "Firm creates own area research dept.," *Palo Alto Times*, January 10, 1963.

large office towers and redevelopment projects, and the Palo Alto Tenants Union staged a number of protests outside of the firm's office in 1970, accusing them and others of "buying up downtown land so new high rise office buildings can be constructed."[45] As a result, Hare, Brewer & Kelley were not able to realize several planned projects, including development of the full block on which 525 University Avenue is located with a second tower and additional low-rise buildings, or a "superblock" development known as the "Bryant Street Projects" several blocks south.[46] In the late 1970s, the firm relocated again to 305 Lytton Avenue.[47] The firm appears to have dissolved in the 2000s, before or soon after the deaths of William K. Kelley in 2007 and Ryland Kelley in 2014.[48]

KNOWN OCCUPANT HISTORY

Hare, Brewer & Kelley was a tenant of the complex until the late 1970s. Other early tenants included anchor tenant United California Bank, Shell Oil Co.'s data division, and Cupples Co., a manufacturing rep for paper products.[49] The complex has always had a variety of financial and professional services office tenants, including real estate, investment, insurance, and computer technology companies. The two-story office buildings have been occupied by bank, restaurant and other retail uses in the past, but are currently occupied by office tenants.

A sampling of previous occupants is provided by available Palo Alto City Directories through Ancestry.com in the following table; the first available directory after construction of the subject property is 1969, and the last available directory is from 1979.

Year of Occupancy	Occupants
1969	• Hare Brewer & Kelley • Golden Shears Barber Shop, Tower Gourmet (restaurant) • Bache & Co. (investment securities) • Berlitz Schools of Languages • United California Bank, Information Systems Design (computer utility) • Schneider Brothers Inc. (clearing house) • Fymshare Inc. (computer time-sharing) • Center Club, International Business Machines Corp. (field eng.) • International Business Mach Corp (Data Proc. Div.) • Executive Action Inc. (employment agency) • Boise Cascade Properties Inc. (real estate)

[45] "Angry," *San Jose Mercury*, July 14, 1970; and "Pickets protest downtown office project," *Palo Alto Times*, June 22, 1970.
[46] "Angry," *San Jose Mercury*, July 14, 1970; and "Pickets protest downtown office project," *Palo Alto Times*, June 22, 1970.
[47] "Palo Alto firm may move," *Palo Alto Times*, December 7, 1976.
[48] David Boyce, "William Kelley, major Silicon Valley real estate player, dies at 84," *The Almanac*, August 31, 2007; and Sue Dremann, "Prominent Palo Alto developer Ryland Kelley dies," *Palo Alto Weekly*, September 2, 2014.
[49] "New 15-story Palo Alto Office Center comes to life," *Palo Alto Times*, September 26, 1966.

	• Gruner W. P. (inv.) • Beck Henry C Co. (general contractor) • Schleh Associates Inc. (business analysts) • Babson Denis G (real estate) • Miller John F • Swan B D Inc • Swan Wersen & Associates Inc. (general insurance agency) • IBM Corp • Jacobs Steven Design Associates • Cupples Co. (paper products) • Benedict Advertising Inc, Peddler Press (publ.) • Meyerson & Co Inc (brokers stocks and bonds) • Independent Securities Corp (inv.) • Service Bureau Corp (district office) • Thoits Lehman & Hanna (lawyers) • American Software & Computer (data processing) • Management Science America (computer consulting) • Best & Co (real estate) • Elevator Electric, Executive Suite (telephone answering service) • Hawaiian Insurance & Guarantee Co Ltd, Hemming-Morse & Co (accts.) • Leonard Companies (real estate), Roth Development (real estate) • Teeple Lawrence R Jr (optics consultant) • Hardy Carley Love & Jaffe (lawyers) • Eldorado Insurance Co. (casualty insurance) • Alza Corporation (phar. research) • Peters Colin (lawyer) • Microform Data Systems Inc (microfilming)
1972	• Hare Brewer & Kelley • Golden Shears Barber Shop • Guckenheimer Fine Foods (restaurant) • Bache & Co (investment securities) • Berlitz School of Languages • Equitable Life Assurance Society • United California Bank • Title Insurance & Trust Co. • Urban Arts Foundation • Tymshare Inc (computer time-sharing) • Center Club • International Business Machines (sub office) • International Business Machines Corp (data processing division) • Boise Cascade Recreational Communities Group, Sibley A E (inv.)

	• Kinghorn G F (investments) • Source E D P Inc (professional placement agency) • Schleh Associates Inc (business analysts) • Jacobs Steven Design Inc • Hawley Smith Co. (real estate) • IBM, Cupples Co. (paper products) • Boise Cascade Recreational Communities Group • H&R Block Executive Tax Service • Ware & Freidenrich (lawyers) • Gallott-Benedict Inc • IBM (Basic Systems Center Office) • Thoits Lehman & Hanna (lawyers) • Management Science America (computer consulting) • Best & Co (real estate) • Walton-Hayes Associates (sewage treatment equipment) • Executive Suite (telephone answering service) • Anixter Bosch & Russell (consultants) • Testdata Systems Corp • Domeine Rudolf (real estate) • Driscoll R W (investigator) • Smith F L Machines (envelope machs.) • Clay Roy L & Associates (management consultants) • Transcontinental Communications Corp • F Mr Inc (financial management) • Wiltek Inc. (telecommunications) • Clasco Systems Inc (Computers) • Mill Eug (acct.) • Nelson School (securities training) • Carley Lovel Small & Munro (lawyers) • Eldorado Insurance Co • Peters Colin (lawyer)
1974	• Golden Shears Barber Shop • Guckenheimer Fine Foods (restaurant) • Edmonds Enterprises Ltd (real estate) • Lloyd Hall Investment Co (real estate) • Milmoe Investment Properties (real estate) • Palo Alto Equity & Mortgage Investors Trust • Bache & Co • Equitable Life Assurance Society • United California Bank • Berlitz School of Languages

	• United Travel Service • Ulrich Peggy Personnel Agency • Hare Brewer & Kelly Inc (real estate) • International Business Machines Corp • Center Club • International Business Machines Corp (data processing) • Boise Cascade Realty Group • Source E D P Inc (professional placement agency) • Schleh Associates Inc (business analysts) • Jacob Steven Design Inc • Rehmus Frederick P (investments) • Inetic Inc • Cupples Co (paper products) • Neely Scott, Ware & Freidenrich (lawyers) • Adams Melbert B (lawyer) • Clay Roy L & Associates (consultant) • Millennium Society Inc (national association for orthodontists) • Bingham Jane J (cap.) • Eldorado Insurance Co • Thoits Lehman & Hanna (lawyers) • Best & Co (real estate) • Walton-Hayes Associates (sewage treatment equipment) • Executive Suite (telephone answering service) • Gewinn Enterprises (inv.) • Hawley Smith Co. (real estate) • Randolph Computer Co (computer sales leasing) • Driscoll R W (investigator) • Smith F L Machines (envelope machs.) • Marion Shovel Co. • Computer Systems of America • Wiltek Inc. (telecommunications) • Keech Edward M (lawyer) • Mills Eug. (acct.) • Nelson School (securities training) • Carley Lovel Small & Munro (lawyers) • Eldorado Insurance Co • Peters Colin (lawyer)
1976	• Golden Shears Barber Shop • Edmonds Enterprises Ltd (real estate) • Bache & Co, Microband • Equitable Life Assurance Society

	• United California Bank • Berlitz School of Languages • United California Bank (Trust Division) • Ulrich Peggy Personnel Agency • International Business Machines Corp • Center Club • International Business Machines Corp (data processing) • Boise Cascade Realty Group • Eskelund & Olsuka Co (consultant) • Schleh Associates Inc (business analysts) • Jacob Steven Design Inc • Rehmus Frederick P (investments) • Driscoll R W • Cupples Co (paper products) • Argonaut Insurance Co. • Ware & Freidenrich (lawyers) • Adams Melbert B (lawyer) • Smith Smith Co. (real estate) • Millennium Society Inc (national association for orthodontists) • Andrews Jane J (cap.) • Dolan Rea & Nelson Inc (inv. counselors) • Thoits Lehman & Hanna (lawyers) • Eldorado Insurance Co • Best & Co (real estate) • Hopkins & Carley (lawyers) • Peters Colin (lawyer)

VI. EVALUATION

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.
In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria.

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

- **Criterion 2 (Persons):** Resources that are associated with the lives of persons important to local, California, or national history.

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

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

The following section examines the eligibility of 525 University Avenue for individual listing in the California Register.

CRITERION 1 (EVENTS)

The Palo Alto Office Center at 525 University Avenue does not appear to be significant under California Register Criterion 1 (Events), which would include resources associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. The complex was built during the post-World War II period when Downtown North and the University Avenue commercial corridor of Palo Alto

experienced substantial amount of redevelopment and commercial infill development. Larger trends in the area during this period also included significant development of corporate office parks. While part of these larger suburban commercial development patterns, the Palo Alto Office Center was not the first of its kind nor is it uniquely representative of this trend such that it could be considered individually eligible under Criterion 1.

The subject property was a touchstone in a larger conversation about urban planning, and "residentialist" citizens and City Council members pushed for a 50-foot height limit which was implemented several years after the construction of the Palo Alto Office Center. Likewise, the Palo Alto Office Center was only one of a number of built and planned developments that precipitated this conversation and cannot be singularly credited for the height limit. No significant events are known to have occurred at 525 University Avenue. Therefore, 525 University Avenue is not eligible for listing under Criterion 1.

CRITERION 2 (PERSONS)

The Palo Alto Office Center at 525 University Avenue does not appear to be significant under California Register Criterion 2 (Persons), as a resource associated with individuals significant locally, to California, or the United States. Office tenants of the Palo Alto Office Center have included numerous financial and professional services firms, technology firms, and attorneys, among others, since it was constructed. While it is possible that one of these tenants employed a person or persons important to local, California, or national history, the building's program as an office tower appears to limit the potential for associative relationships that would be required for the property to be considered significant under Criterion 2 (Persons).

However, the Palo Alto Office Center's developer and the office tower's earliest anchor tenant, the real estate development firm of Hare, Brewer & Kelley, does appear to be significant to local history. The firm was one of the largest and most prominent development firms in Palo Alto and the San Francisco Bay Peninsula in the early to mid-20th century, working on numerous projects from the Mayfield Mall and Moffett Park to numerous residential communities like Lindenwood, Crescent Park, Leland Manor, Ladera, and Atherton Heights. The firm, under the leadership of William M. Kelley until his death in 1964 and subsequently under the leadership of his sons William K. and Ryland Kelley, was a significant force in shaping the commercial and residential development of Palo Alto and the surrounding Peninsula. The firm's most active years were in the post-World War II period through the 1960s, during which time the firm was based at 525 University Avenue—at first in a remodeled apartment building and then in the Palo Alto Office Center, which it developed. Although the firm was only headquartered in the Palo Alto Office Center from 1966, the year of completion, to circa 1976, the firm was associated with the site as early as 1953, and the project was

one of their cornerstone development projects. Therefore, 525 University Avenue appears to be significant under California Register Criterion 2, with a period of significance of 1966 to 1976.

CRITERION 3 (ARCHITECTURE)

The Palo Alto Office Center at 525 University Avenue appears to be eligible under Criterion 3 (Architecture), which includes resources that embody characteristics of a type, period, region, or method of construction. The property was designed by architect Tallie Maule in the Late Modernist style and was completed in 1966. Maule was a renowned architect in the Bay Area, particularly in his role as Chief Architect of Design Coordination for the Bay Area Rapid Transit (BART), and so respected for his work in transportation infrastructure planning design that he was invited to consult on several transit system projects globally. In addition to his award-winning work with BART, Maule's design for the Palo Alto Office Center was awarded the 1964 Citation of Merit by *Progressive Architecture*, a prominent architecture magazine at the time. As such, the Palo Alto Office Center is considered the work of a local master architect.

Furthermore, the complex embodies the characteristics of the Late Modernist style, which is an idiom of the Modern Movement that was prevalent in the 1960s and 1970s. The Palo Alto Office Center exhibits many of the character-defining features typical of Late Modernist design, including a strong geometric form, linear accents, a symmetrical and modular composition, integrated structural elements, strong pattern of solid and void (created by the glazing and precast concrete panels), high quality materials at the ground floor, flexible interior spaces, and a landscaped plaza. In particular, the tripartite composition of the tower and the arched triple-height windows and curved columns with a refined bush-hammer concrete finish at the base exemplify the use of exaggerated scale and reference to simplified classical forms, which are characteristic of Late Modernism. The Palo Alto Office Center is an exceptional example of the Late Modernist style in Palo Alto and the work of master architect Tallie Maule, and is therefore significant under California Register Criterion 3 with a period of significance of 1966, the year of completion.

CRITERION 4 (INFORMATION POTENTIAL)

The "potential to yield information important to the prehistory or history of California" typically relates to archeological resources, rather than built resources. When California Register Criterion 4 (Information Potential) does relate to built resources, it is relevant for cases when the building itself is the principal source of important construction-related information. The analysis of the property at 525 University Avenue for eligibility under Criterion 4 is beyond the scope of this report.

Integrity

In order to qualify for listing in any local, state, or national historic register, a property or landscape must possess significance under at least one evaluative criterion as described above and retain integrity. Integrity is defined by the California Office of Historic Preservation as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance," or more simply defined by the National Park Service as "the ability of a property to convey its significance."[50]

In order to evaluate whether the subject property retains sufficient integrity to convey its historic significance, Page & Turnbull used established integrity standards outlined by the *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Seven variables, or aspects, that define integrity are used to evaluate a resource's integrity—location, setting, design, materials, workmanship, feeling, and association. A property must possess most, or all, of these aspects in order to retain overall integrity. If a property does not retain integrity, it can no longer convey its significance and is therefore not eligible for listing in local, state, or national registers.

The seven aspects that define integrity are defined as follows:

> Location is the place where the historic property was constructed or the place where the historic event occurred;
>
> Setting addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s);
>
> Design is the combination of elements that create the form, plan, space, structure, and style of the property;
>
> Materials refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property;
>
> Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;

[50] California Office of Historic Preservation, *Technical Assistance Series No. 7: How to Nominate a Resource to the California Register of Historical Resources* (Sacramento: California Office of State Publishing, 4 September 2001) 11; U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: National Park Service, 1995) 44.

Feeling is the property's expression of the aesthetic or historic sense of a particular period of time; and

Association is the direct link between an important historic event or person and the historic property.

LOCATION

The subject property retains integrity of location. The complex has remained situated at its location of original construction since 1966.

SETTING

The subject property retains integrity of setting. The complex was constructed during a period of post-World War II redevelopment along University Avenue, Palo Alto's downtown commercial corridor. Prior to redevelopment, the block had a number of residential properties, and today there are still residential properties across Tasso Street and along Lytton Avenue. As when the property was constructed, the block continues to be surrounded by a mix of commercial and residential properties, with commercial activity primarily fronting University Avenue or the side streets immediately adjacent.

DESIGN

The subject property retains integrity of design. No major exterior alterations or additions have been made to the complex. Modest exterior alterations have included replacing exterior doors, adding (and removing) ATM machines, adding two exterior doorways at existing window bays, adding telecommunication equipment and a safety rail to the rooftop mechanical penthouse, and converting the plaza fountain to a planter. Interior alterations have occurred within private tenant office spaces, as well as some alterations to the main lobby of the office tower and the full remodel of the former bank space in the South Wing to an office tenant space. While the former United California Bank was a semi-public space designed by architect Tallie Maule, the loss of the interior features does not substantially diminish the overall design of the complex and, except for replacement doors, does not affect the exterior of the South Wing. The main lobby of the office tower is also a semi-public space and retains its overall design, with entrances below the pedestrian bridges accessing lobby spaces on either side of an elevator core. Although some interior lobby materials have been replaced, as discussed below, the key characteristic feature of the exposed concrete columns remains. The Palo Alto Office Center retains all of its essential Late Modernist design features, including strong geometric form, linear accents, a symmetrical and modular composition, integrated structural elements, strong pattern of solid and void (created by the glazing and precast concrete panels), high quality materials at the ground floor, flexible interior spaces, and

a landscaped plaza. Furthermore, the unique and iconic design features of the Palo Alto Office Center—the arched bush-hammered concrete columns at the office tower and shaped concrete columns at the low-rise wings—remain unaltered.

MATERIALS

The subject property retains integrity of materials. Minor material alterations include the replacement of sections of brick paving with stone between the tower and the two wings, and at the main lobby of the office tower. The fountain at the rear plaza has been turned into a planter, but the materials that compose the fountain, including the concrete walls and blue tile cladding, remain. The interior materials of the former bank in the South Wing have been replaced and the space converted to an office space, but this alteration does not substantially impact the overall integrity of the complex. The flooring, ceiling and some wall materials have been altered or replaced in the main office tower lobby, but key characteristic materials, such as the exposed bush-hammered concrete columns remain, as do some original door handles and glazed doors and partition walls. Except for the replacement of the exterior doors, which have been replaced with relatively compatible glazed doors, the exterior materials of all three buildings remain unaltered. The doors of the elevator structure at the upper plaza, but all other original materials remain. Characteristic materials of the Late Modernist design, including the bush-hammered concrete columns at the office tower, precast concrete window panels, blue tile at tower shaft soffits, vaulted concrete penthouse roof, shaped concrete columns at the low-rise wings, and the bronze anodized aluminum windows and black granite panels at all three buildings are all intact.

WORKMANSHIP

The subject property retains integrity of workmanship. The Late Modernist design of the Palo Alto Office Tower utilizes industrial materials and methods, which was characteristic of the Modern Movement. Workmanship is exhibited in the bush-hammer finish of the concrete columns, as well as in details such as the design of the interior lobby door handles, selection of black granite panels, and fillet-joint corner details of the columns and corner windows.

FEELING

The subject property retains integrity of feeling. The Palo Alto Office Center retains integrity of location, setting, design, materials, and workmanship, all of which contribute to its character as a Late Modernist office tower. The architectural style, material palette, siting, and scale of the project with its high-rise tower and low-rise wings around a hardscaped plaza are all recognizable characteristics of 1960s downtown redevelopment projects.

ASSOCIATION

The subject property retains integrity of association. While the original owners and tenants of the Palo Alto Office Center, Hare, Brewer & Kelley, no longer occupy the complex, turnover in tenants is typical with large-scale office complexes. The complex still retains a clear association with the redevelopment and revitalization efforts in downtown Palo Alto in the post-World War II period, and remains iconic as the tallest building in the city and one of the cited reasons for the later imposed building height restrictions.

Overall, the Palo Alto Office Center at 525 University Avenue retains historic integrity.

Character-Defining Features

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The character-defining features of 525 University Avenue include:

- 15-story office tower with square footprint and tripartite composition of base, shaft, and penthouse floor with mechanical rooftop penthouse
    - Bush-hammered concrete columns with curved projections and fillet corner joints
    - Three-story, three-point arched window openings along the base, including original bronze anodized aluminum fenestration and black granite panels
    - Cantilevered shaft with highly regular fenestration composed of projecting precast concrete panels and bronze anodized aluminum windows
    - Blue tile at soffit of the cantilevered shaft
    - Recessed 15th-story penthouse with vaulted, cantilevered roof and fully glazed walls opening onto a brick patio
    - Two primary entrance locations, each under a pedestrian bridge
    - Original interior lobby features, including exposed bush-hammered concrete columns and sideways T-shape door handles

- Two flat-roofed two-story wings
    - Enclosed pedestrian bridges at second floor, connecting to the office tower, including bronze anodized aluminum windows and black granite panels
    - Highly regular fenestration with fixed, two-lite anodized aluminum windows and black granite panels
    - Projecting concrete columns with shaped feature at the cornice, with attached rail
    - Curved concrete base and cornice
- Associated landscape features
    - Brick hardscaping along University Avenue and Cowper and Tasso streets
    - Terraced rear brick plaza, including broad brick steps
    - Former elevator structure at upper terrace
    - Concrete planters and former fountain at lower terrace
    - Fixed concrete planters along University Avenue.

VII. CONCLUSION

The Palo Alto Office Center at 525 University Avenue was completed in 1966 in the Downtown North neighborhood of Palo Alto, along the city's main commercial corridor. The office tower, at 15 stories and 234 feet tall, was the tallest building between San Francisco-Oakland and Los Angeles at the time of construction and remains the tallest building in Palo Alto.

The project was designed by Tallie Maule in the Late Modernist style for the property owners and real estate development firm, Hare, Brewer & Kelley. The firm, which had been originally founded in 1925, had been operating out of a converted apartment building at 525 University Avenue since 1953, before undertaking the massive redevelopment project, which originally encompassed a city block. Hare, Brewer & Kelley was one of the most significant real estate developers in the mid-20th century in Palo Alto and the Peninsula, and the Palo Alto Office Center was their crowning commercial development project. As such, the property has been found to be eligible for the California Register under Criterion 2 (Persons), for association with the firm Hare, Brewer & Kelley, including the leaders of that firm—William M. Kelley and his sons William K. and Ryland Kelley—with a period of significance of 1966 to 1976, the years the firm occupied the offices as their headquarters.

Furthermore, the Palo Alto Office Center was an architecture award-wining project by master architect Tallie Maule and is an exceptional example of the Late Modernist style in Palo Alto. As such, the property has also been found to be eligible for the California Register under Criterion 3 (Architecture) with a period of significance of 1966, the year of completion. The property retains all seven aspects of integrity.

Therefore, 525 University Avenue is a historic resource for the purposes of CEQA review.

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IX. APPENDIX

Preparer Qualifications

This Historic Resource Evaluation was prepared by Page & Turnbull of San Francisco, California. Page & Turnbull staff responsible for this report include Ruth Todd, FAIA, Principal-in-charge; Christina Dikas, Associate Principal and project manager; and Hannah Simonson, Cultural Resources Planner and primary author, all of whom meet or exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, Architectural History, or History.

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LANDSCAPE PROJECT
Palo Alto Office Center
525 University Avenue
Palo Alto, California

Richard Patenaude | *August 2021*

1. INTRODUCTION

The City of Palo Alto retained M-Group to complete a Permit Plans Review for the Palo Alto Office Center at 525 University Avenue (subject property) in Palo Alto, California, in order to assess compliance of the proposed Landscape Project by **brick** with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

2. HISTORIC RESOURCE EVALUATION

The following summary of the historic significance of 525 University Avenue was provided in an HRE (December 3, 2020) prepared by Page & Turnbull:

The Palo Alto Office Center at 525 University Avenue was completed in 1966 in the Downtown North neighborhood of Palo Alto, along the city's main commercial corridor. The office tower, at 15 stories and 234 feet tall, was the tallest building between San Francisco-Oakland and Los Angeles at the time of construction and remains the tallest building in Palo Alto.

The project was designed by Tallie Maule in the Late Modernist style for the property owners and real estate development firm, Hare, Brewer & Kelley. The firm, which had been originally founded in 1925, had been operating out of a converted apartment building at 525 University Avenue since 1953, before undertaking the massive redevelopment project, which originally encompassed a city block. Hare, Brewer & Kelley was one of the most significant real estate developers in the mid- 20th century in Palo Alto and the Peninsula, and the Palo Alto Office Center was their crowning

commercial development project. As such, the property has been found to be eligible for the California Register under Criterion 2 (Persons), for association with the firm Hare, Brewer & Kelley, including the leaders of that firm—William M. Kelley and his sons William K. and Ryland Kelley—with a period of significance of 1966 to 1976, the years the firm occupied the offices as their headquarters.

Furthermore, the Palo Alto Office Center was an architecture award-wining project by master architect Tallie Maule and is an exceptional example of the Late Modernist style in Palo Alto. As such, the property has also been found to be eligible for the California Register under Criterion 3 (Architecture) with a period of significance of 1966, the year of completion. The property retains all seven aspects of integrity.

Therefore, 525 University Avenue is a historic resource for the purposes of CEQA review.[1]

M-Group concurs with the conclusions of Page & Turnbull's historic resource determination, including its description of character-defining features based upon an adequate historic context.

3. LANDSCAPE PROJECT

Plans for the proposed Landscape Project by **brick**, for CM Capital Corporation, were submitted to the City of Palo Alto on June 4, 2021. The City requested M-Group's review of the Plans for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The scope of work includes an interior renovation of the main tower ground floor lobby; reglazing of the three-story main tower windows and insertion of new doorways; addition of a new pergola structure on the rear (west) side of the main tower (which would act as a wind screen); addition of a new pergola structure at the upper plaza; enclosure of the existing exterior plaza stair accessing the underground parking garage with a new glazed enclosure; replacement of waterproofing above the structural slab at grade; replacement of hardscaping at the plaza including construction of new planters; and addition of new vegetation in the planters. The proposed new storefront window system at the three-story tower base is designed to match the existing mullion pattern, bronze anodized aluminum material, and dimension of lites, but include new low emissivity ("low-e") clear glazing. As currently

[1] Page & Turnbull, "Palo Alto Office Center – 525 University Avenue: Historic Resource Evaluation," submitted to City of PaloAlto (December 3, 2020), 60.

proposed, the existing granite spandrel panels will be retained in place and back-painted glass panels will be installed over the existing panels.

4. FINDINGS

M-Group has reviewed the Submittal Plans regarding potential impact on the subject property's character-defining features. In reviewing the Plans, it was discovered that Page & Turnbull had submitted a Standards for Rehabilitation Compliance as follows:

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimalchange to the defining characteristics of the building and its site and environment.*

The proposed project will continue the commercial office use of 525 University Avenue with acenter-block outdoor plaza. Thus, the project is in compliance with Rehabilitation Standard 1.

2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The historic character of the property will be retained and preserved in the proposed project. No alterations are proposed at the two low-rise wings or enclosed pedestrian bridges, and nearly all of character-defining features at the main tower will remain unaltered, including the massing, design, and tripartite composition of the 15-story main office tower, the bush-hammered concrete columnsat the tower base, the cantilevered tower shaft and all windows at the shaft, blue tile soffit at the shaft, recessed penthouse, original entrance locations, and exposed concrete columns at the lobby.The proposed project involves creating greater visual transparency and access at the three-story base of the main tower. The proposed project will replace the historic three-story base mullions in- kind with a matching pattern and bronze anodized aluminum material to accommodate new transparent low-e glass. The granite spandrel panels are to be retained in place. Thus, the characterof the three-story storefront windows at the base will be retained.

The interior lobby has been remodeled previously and has non-original finishes at the floor, ceiling,and walls. The project sponsor has committed to salvaging and reusing the remaining original sideways T-shape door handles inside the lobby, and the historic concrete columns at the interior will remain exposed. Thus, the interior remodel will not diminish the historic character of the building.

Although extensive alterations are proposed to the hardscaping and landscaping features of the site, including removal of planters, stairs, and the elevator tower, the brick paving along Cowper andTasso streets and at the corners with University Avenue will be retained, and the character of an open center-block plaza with two levels separated by broad steps will be retained. Furthermore, the spatial relationships between the tower, two low-rise wings, and the University Avenue streetscape will be retained. As such, the historic integrity of design, materials, feeling, association, and setting will all be retained and the historic character of the property as a Late Modern office tower complex with a center-block plaza will be preserved. Thus, the project is substantially in compliance withRehabilitation Standard 2.

3. *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architecturalelements from other buildings, shall not be undertaken.*

No conjectural features or architectural elements from other buildings will be added to the building. The prosed additions of the two metal pergolas at the center-block plaza, glazed stair enclosure, andnew planters will be clearly contemporary and will not create a false sense of historical development. Thus, the project is in compliance with Rehabilitation Standard 3.

4. *Most properties change over time; those changes that have acquired historic significance in theirown right shall be retained and preserved.*

The period of significance for 525 University Avenue is 1966-1976. No changes or additions have occurred since 1976 that have acquired historic significance in their own right. Thus, the project is incompliance with Rehabilitation Standard 4.

5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

As described in Standard 2, distinctive features, finishes, and examples of craftsmanship will be preserved in their entirety at the low-rise buildings and the shaft of the tower. The dramatic and distinctive concrete columns with curved projections and fillet corner joints at the tower base will also be preserved. The three-story storefront window mullions at the tower base will be replaced in-kind, preserving their character and the granite spandrel panels will be preserved in place. The reinforced concrete construction, distinctive projecting precast concrete panels at the tower shaft and projecting concrete columns at the low-rise office buildings, which exhibit the craftsmanship of the mid-twentieth century, will be retained. As previously noted, the remaining original sideways T- shape door handles inside the lobby will be salvaged and reused. The metal mechanical room gate at the rear (west) façade of the main tower will also be retained. The plaza planters, steps, and elevator tower will be removed. Although the brick paving will be removed from the plaza, the brick paving will be retained along the low-rise buildings at Cowper and Tasso streets, and at the corners with University Avenue, which are in the publicly accessible right-of-way. While the proposed projectdoes involve the removal of some distinctive features, these are at the rear plaza and the vast majority of distinctive features and finishes—particularly at the main tower and two low-rise wings will be preserved. Thus, the project is substantially in compliance with Rehabilitation Standard 5.

6. *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

The project does not include any deteriorated historic materials that will be removed or replaced.Thus, the project is in compliance with Rehabilitation Standard 6.

7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using thegentlest means possible.*

The project does not include any physical or chemical treatments to clean or remove historicmaterials or finishes. Thus, the project is in compliance with Rehabilitation Standard 7.

8. *Significant archeological resources affected by a project shall be protected and preserved. If suchresources must be disturbed, mitigation measures shall be undertaken.*

Limited excavation will be required for repaving and waterproofing the plaza, but do not appear likely to disturb any ground that was not previously disturbed during original construction. In the case of discovery of archaeological materials, provided that standard discovery procedures for theCity of Palo Alto are followed, the proposed project will adhere to Rehabilitation Standard 8.

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

Per the discussion in Standards 2 and 5, the proposed project includes the replacement of the three-story storefront windows at the base. The bronze anodized aluminum mullions will be replaced in- kind to match the existing pattern and profile, but will accommodate new transparent low-e glazing, and the historic granite spandrel panels will be preserved in place. This treatment is compatible and retains the character of Tallie Maule's Late Modern tower design. While new paired, fully glazed entry doors will be installed at the east façade fronting University Avenue and at the rear (west) façade facing the plaza (where currently storefront windows exist), these fully glazed doors are compatible in design and will be within the existing storefront window mullion pattern. They will not destroy the historic character or spatial relationships. The historic entryways to the tower, below the two pedestrian bridges on the north and south facades, will be retained as entrances; the currentlyexisting doors are replacement doors and will be replaced with new compatible fully glazed doors.

The addition of the metal pergola at the rear (west) façade of the main tower does not destroy historic materials and is

reversible (as discussed later relative to Standard 10). The pergola is clearly modern in its material and metal design, but is compatible in design, as the supporting columns at the outer edge of the pergola align with the historic concrete columns of the tower. Additionally, the upturned edge of the pergola appears to take cues from the curve of the projecting portions of the concrete columns, and the perforated metal pattern appears to take cues from the existing metal gate at the mechanical room on the west side of the building (which will be below the pergola). The grid of the pergola roof structure also appears to match the grid of the existing waffle slab concrete floor plates of the tower, which will be exposed at the interior lobby. The scale of the metal pergola responds to the existing levels of the floor plate and maintains open circulation at the plaza without disrupting the spatial relationship of the tower to the adjacent low-rise wings or the open rear plaza.

Existing concrete planters will be removed, and new concrete planters will be installed in front of thelow-rise office buildings and at the center-block plaza. These planters are compatible in material, scale, and design with the character of the site and do not disrupt the spatial relationships between the three buildings, the relationship to University Avenue, or the open character of the plaza.
Proposed metal fencing in the upper plaza references the pattern of the original metal gate at the west façade of the tower. The former elevator structure, which has previously been altered and made non-functional, will be removed and a new glass stair enclosure will be installed at the upperplaza stair to the below-ground parking garage. The removal of the elevator structure does not significantly alter the character of the plaza, and the new stair enclosure will be clearly contemporary, but compatible in scale. It will not disrupt the flow or sightlines in the plaza. The steps at the plaza will be replaced with broader stadium steps for seating, but the character of the two-tiered plaza will remain.

As previously noted, the brick paving will be retained along the low-rise office buildings on Tasso andCowper streets, and at the corners with University Avenue. Non-original paving currently exists immediately surrounding the main tower. The non-original paving and sections of the brick paving along University Avenue and at the center-block plaza will be replaced with cast-in-place concrete in order to address waterproofing and maintenance concerns. While this new paving will remove some historic material, the new paving is designed to be scored on a 9'-by-9' grid which aligns with the existing brick pattern. Thus, the grid pattern, which also aligns with the structural bays of the historic buildings, will be carried through the site in the proposed new paving, and the original brick material will remain in large sections of the highly visible public right-of-way along Tasso and Cowper streets.
The proposed project involves hardscaping and landscaping alterations that will remove and/or replaces some materials and features, but the overall character and spatial relationships of the office tower complex with an open, two-tiered center-block plaza will remain intact. Tallie Maule's original designs included a number of iterations with varying designs of the center-block plaza, and also planned for additional buildings and development on the block in the future. In the proposed project, the function of the semi-public open plaza will be retained, and a significant portion of the brick paving at the public right-of-way will be retained. The new addition of the metal pergolas is compatible in scale and design and will be reversible. The larger pergola (wind screen) at the main tower will be minimally visible from the public right-of-way along Tasso and Cowper streets. Most of historic materials and character-defining features will remain intact and untouched by the proposedproject. The site will still be legible as a cohesive office complex. Thus, the project is substantially in compliance with Rehabilitation Standard 9.

10. *New additions and adjacent or related new construction shall be undertaken in such a mannerthat if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

None of the three buildings at 525 University Avenue are being expanded with additions. The erection of the metal pergola at the rear (west) side of the tower is designed such that it is anchored in the existing battered concrete columns. Thus, if removed in the future, the essential form and integrity of the historic tower will remain intact and require only minimal concrete patching to repairthe anchor points. The proposed project currently has two alternative treatments at the existing granite spandrel panels at the base of the tower; both alternatives will retain the existing granite spandrel panels in place and install back-painted glass panels over them. These panels will be reversible and could be removed in the future to reveal the historic granite spandrel panels in their original locations. If the proposed new planters and landscaping, stair enclosure, or free-standing pergola at the upper plaza are removed, the spatial relationship between the main tower and two low rise buildings will be retained and the open character of the center-block plaza will be retained. Thus, the project is in compliance with Rehabilitation Standard 10.

M-Group concurs with the conclusions of Page & Turnbull's historic resource determination, including its description of character-defining features based upon an adequate historic context.

M-Group furthermore concurs, that the proposed Landscape Project, as designed, retains and preserves the overall historic character of the Palo Alto Office Center. The project involves rehabilitation in a manner mostly consistent with the Secretary of the Interior Standards.

Furthermore, M-Group concurs that "it does not appear that the project will cause a significant impact" pursuant to CEQA.

SEISMIC RETROFIT PROJECT
Palo Alto Office Center
525 University Avenue
Palo Alto, California

Richard Patenaude | *August 2021*

1. INTRODUCTION

The City of Palo Alto retained M-Group to complete a Building Permit Plans Review for the Palo Alto Office Center at 525 University Avenue (subject property) in Palo Alto, California, in order to assess compliance of the proposed Seismic Strengthening Project by CM Capital Corporation with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

2. HISTORIC RESOURCE EVALUATION

An *Historic Resource Evaluation* (HRE) was prepared by Page & Turnbull, dated December 3, 2020, at the request of the City of Palo Alto for the subject property. The subject property is located on 1.36-acre parcel that extends across approximately two-thirds of a downtown city block, bounded by Tasso Street to the north, University Avenue to the east, Cowper Street to the south, and the commercial property at 530 Lytton Avenue to the west. The property is located in the Downtown North neighborhood of Palo Alto in a commercial CD-C (P) zoning district. The property includes three buildings: a central 15-story office tower and two two-story commercial wings that are connected to the tower by elevated pedestrian bridges. The buildings were designed by architect Tallie Maule for local real estate developers Hare, Brewer & Kelley and were completed in 1966. A three-story underground parking garage is located below a semi-public but privately-owned plaza.

525 University Avenue is not currently listed on any federal, state, or local register of historic resources. However, Page & Turnbull's *HRE* determined that the property is

eligible for listing on the California Register of Historical Resources under Criterion 3 (Architecture) as an excellent local example of Late Modernist design by master architect Tallie Maule, and the property retains all seven aspects of integrity. Therefore, 525 University Avenue is an historic resource for the purposes of CEQA review.

Character-Defining Features

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The character-defining features of 525 University Avenue include:

- 15-story office tower with square footprint and tripartite composition of base, shaft, and penthouse floor with mechanical rooftop penthouse
  - Bush-hammered concrete columns with curved projections and fillet corner joints
  - Three-story, three-point arched window openings along the base, including original bronze anodized aluminum fenestration and black granite panels
  - Cantilevered shaft with highly regular fenestration composed of projecting precast concrete panels and bronze anodized aluminum windows
  - Blue tile at soffit of the cantilevered shaft
  - Recessed 15th-story penthouse with vaulted, cantilevered roof and fully glazed walls opening onto a brick patio
  - Two primary entrance locations, each under a pedestrian bridge
  - Original interior lobby features, including exposed bush-hammered concrete columns and sideways T-shape door handles

- Two flat-roofed two-story wings
  - Enclosed pedestrian bridges at second floor, connecting to the office tower, including bronze anodized aluminum windows and black granite panels
  - Highly regular fenestration with fixed, two-lite anodized aluminum windows and black granite panels
  - Projecting concrete columns with shaped feature at the cornice, with attached rail

- Curved concrete base and cornice

- Associated landscape features
  - Brick hardscaping along University Avenue and Cowper and Tasso streets
  - Terraced rear brick plaza, including broad brick steps
  - Former elevator structure at upper terrace
  - Concrete planters and former fountain at lower terrace
  - Fixed concrete planters along University Avenue.

M-Group concurs with the conclusions of Page & Turnbull's historic resource determination, including its description of character-defining features based upon an adequate historic context.

3. SEISMIC STRENGTHENING PROJECT

Permit Submittal Plans for the proposed Seismic Strengthening Project by CM Capital Corporation were submitted to the City of Palo Alto on June 18, 2021. The City requested review of the Plans for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

4. FINDINGS

M-Group has reviewed the Permit Submittal Plans regarding potential impact on the subject property's character-defining features. The Plans indicate that the proposed seismic strengthening measures occur within the interior of the structure only and do not impact the structure's character-defining features, which are visible on the exterior of the structure. Therefore, M-Group determines that it does not appear that the Seismic Retrofit Project will cause a significant impact" pursuant to CEQA, and that there is no need for further evaluation pertaining to the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.