

TO: HONORABLE CITY COUNCIL

FROM: CITY MANAGER DEPARTMENT: PLANNING AND COMMUNITY ENVIRONMENT

DATE: APRIL 12, 2010 CMR: 205:10

REPORT TYPE: CONSENT

SUBJECT: Approval of the Nomination of the Category 2 Roth Building to the National Register of Historic Places and transmittal of a letter of support to the State Historical Resources Commission (Public Facilities (PF) with a SOFA 1 CAP)

5

EXECUTIVE SUMMARY

The Roth Building at 300 Homer Avenue is currently designated as a Category 2 historic resource under the City's historic resource inventory assuring the building's status as an historic resource for development purposes. The National Register of Historic Places designation will provide additional recognition for the building and will enhance opportunities for funding its renovation. On December 17, 2009, staff received a request from the State Office of Historic Preservation (OHP) asking for review of the nomination of the Roth Building to the National Register of Historic Places. OHP requested the review because the subject property is City owned and the City is classified as a Certified Local Government (CLG). CLG status requires review by a City's historic review board prior to any National Register listing. OHP requested that the City review the nomination for compliance with National Register eligibility criteria and, if in support, send a letter of support to the State Historical Resources Commission (State Commission) prior to April 30, 2010, when the item will be reviewed by the State Commission at its quarterly meeting. The Historic Resources Board (HRB) conducted the review at a public hearing on March 3, 2010. The HRB unanimously supported the nomination and recommended that the Council support the nomination and send a letter of support to the State Commission.

RECOMMENDATIONS

The HRB and staff recommend that the City Council, acting in its capacity as a CLG and as the property owner, support the approval of the nomination of the City's historic Category 2 Roth Building located at 300 Homer Avenue to the National Register of Historic Places and send a letter of support to the State Commission.

BACKGROUND

The Roth Building at 300 Homer Avenue is currently designated as a Category 2 historic resource under the City's historic resource inventory assuring the building's status as an historic resource for development purposes. A Category 2 designation is defined as a building of major regional importance, meritorious work of the best architects or an outstanding example of an

1. Criterion A: The property is associated with events that have made a significant contribution to the broad patterns of our history; and
2. Criterion C: The property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

Criterion A represents the period of 1932-1999 when the property was utilized as a professional medical facility. During that time it was associated with persons and events important to the development of the healthcare industry in Palo Alto by establishing the first multi-specialty group medical practice in the community in 1932 that continued until closure in 1999. The original organizational pattern became a model within the healthcare industry nationwide. The organization's long-term commitment to innovative community healthcare and research laid the foundation for the progressive healthcare network that thrives in Palo Alto today.

Criterion C represents the architectural significance of the building during the time of construction in 1932 as representative of the work of a master architect, Birge Clark, and an artist, Victor Arnautoff, as a resource displaying high architectural and artistic value. The building was constructed in the Spanish Eclectic style of concrete with a terra cotta roof. Exterior frescoes created by Victor Arnautoff depicting contrasts between modern medical practices of the era and primitive medical practices are of high artistic value to the community. The nomination form is provided as Attachment B.

If the Council is in support of the proposed nomination of the Roth Building to the National Register of Historic Places, a letter of support will be submitted to the State Historical Resources Commission prior to its quarterly meeting on April 30, 2010. A draft letter of support is provided as Attachment C. If the Council is not in support of the proposed nomination, a notarized letter of objection is requested to be mailed to OHP prior to the scheduled meeting date. Consent of the property owner is not required for a National Register nomination but properties cannot be listed over the objection of the owner.

TIMELINE

The State Commission will meet for its quarterly meeting on April 30, 2010. If the State Commission approves the nomination, it is then sent to the State Historic Preservation Officer for nomination to the National Register. The final determination is made 45 days after receipt by the Keeper of the National Register in Washington, D.C.

POLICY IMPLICATIONS

The Museum currently has an Option to Lease agreement in place with the City for the Roth Building. The Museum is continuing with fund raising efforts with the intent of obtaining a long-term lease for the building and utilizing the building for a local history museum. The listing of the Roth Building to the National Register has multiple historic protection and funding benefits as previously discussed. In support of the fund raising efforts by the Museum, the listing would allow the utilization of federal tax credits that could assist in the rehabilitation of the building.

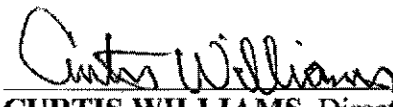
RESOURCE IMPACTS

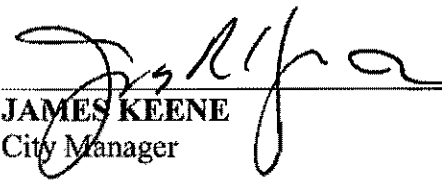
Resource impacts include involvement of staff time, allowance for some permit revenue when project is submitted and built and would not prohibit future sale of the site if the Museum does not move ahead with the project.

ENVIRONMENTAL REVIEW

The project is categorically exempt from the California Environmental Quality Act (CEQA) review per Section 15331. Zone District: Public Facilities (PF) with a SOFA I cap.

PREPARED BY: 
KATHY MARX, Planner

DEPARTMENT HEAD: 
CURTIS WILLIAMS, Director
Planning and Community Environment

CITY MANAGER APPROVAL: 
JAMES KEENE
City Manager

ATTACHMENTS

- Attachment A: Findings for Approval
- Attachment B: Roth Building National Register Nomination
- Attachment C: Draft Letter of Support
- Attachment D: March 3, 2010 HRB staff report
- Attachment E: March 3, 2010 HRB minutes

Courtesy Copy: Palo Alto History Museum

**ATTACHMENT A
CITY COUNCIL
FINDINGS FOR APPROVAL
300 Homer Avenue**

The Palo Alto City Council has found the proposed National Register of Historic Places nomination of the building located at 300 Homer, locally known as the Roth Building, compliant with the evaluation criterion established by The National Historic Preservation Act of 1966, as amended.

- 1) The property known as the Roth Building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto by establishing the first multi-specialty group medical practice in the community in 1932 that became a model within the healthcare industry nationwide. The organization's long-term commitment to innovative community healthcare and research laid the foundation for the progressive healthcare network that thrives in Palo Alto today; and

- 2) The building known as the Roth Building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect, Birge Clark, and artist, Victor Arnautoff, and as a resource displaying high artistic value. Constructed in the Spanish Eclectic style, the concrete structure with a terra cotta roof remains for the most part intact since it was constructed in 1932. Exterior frescoes created by Victor Arnautoff depicting contrasts between modern medical practices of the era and primitive medical practices are of high artistic value to the community.

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional certification comments, entries, and narrative items on continuation sheets (NPS Form 10-900a).

1. Name of Property

Historic name Palo Alto Medical Clinic

Other names/site number Roth Building

2. Location

street & number 300 Homer Avenue

not for publication

city of town Palo Alto

vicinity

State California

code CA

county Santa Clara

code 085

zip code 94301

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___ national ___ statewide ___ local

Signature of certifying official/

Date

Title

State or Federal agency and bureau

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of certifying official

Date

Title

State or Federal agency and bureau

4. National Park Service Certification

I, hereby, certify that this property is:

Signature of the Keeper

Date of Action

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:)

5. Classification

Ownership of Property
(Check as many boxes as apply)

<input type="checkbox"/>	private
<input checked="" type="checkbox"/>	public - Local
<input type="checkbox"/>	public - State
<input type="checkbox"/>	public - Federal
<input type="checkbox"/>	private

Category of Property
(Check only one box)

<input checked="" type="checkbox"/>	building(s)
<input type="checkbox"/>	district
<input type="checkbox"/>	site
<input type="checkbox"/>	structure
<input type="checkbox"/>	building(s)
<input type="checkbox"/>	object

Number of Resources within Property
(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
1		buildings
		sites
		structures
		Objects
		buildings
1		Total

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing)

Number of contributing resources previously listed in the National Register

N/A

6. Function or Use

Historic Functions
(Enter categories from instructions)

HEALTH CARE/CLINIC

Current Functions
(Enter categories from instructions)

VACANT/NOT IN USE

7. Description

Architectural Classification
(Enter categories from instructions)

Late 19th and 20th Century Revival

Others: Spanish Colonial Revival/Monterey Style

Influence

Materials
(Enter categories from instructions)

foundation: Concrete

walls: Concrete

roof: Terra-Cotta

other: (see continuation sheet)

Narrative Description

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

Summary Paragraph

300 Homer Avenue is a one- and two-story, Spanish Eclectic style, U-shaped concrete building clad in beige cement stucco and topped by a clay Mission tile roof. The building sits on a corner lot, at the edge of Heritage Park, bounded by Homer Avenue and Bryant Street. It is oriented northwest, facing Homer Avenue with a playground to the northeast, an open grassy space to the southeast and residential development facing it on the surrounding blocks. The neighborhood is a mixture of new infill, multi-family housing and traditional turn-of-the century residences. Limited ground-floor commercial enterprises are located along Bryant Street. The subject building wraps around a landscaped courtyard that is centered on a large oak tree. The central spine of 300 Homer Avenue runs parallel with Homer Avenue and is two-stories with a hipped, tile-clad roof. A three-story elevator shaft and stairwell punctuates the roof plane at the central rear of the building. Opposite the elevator shaft and stairwell, facing the courtyard, is a second floor rusticated wood balcony, reminiscent of the Monterey style. Below the balcony, also facing the courtyard is an arched arcade, which protects the primary entry to the building. Perpendicular to the spine are two, one-story wings with front-facing gables and tile-clad roofs. The building predominantly has five-lite steel casement window modules, arranged in large, roughly square assemblies of various sizes. Most windows are currently covered by plywood on the exterior surface of the building. The interior is a mix of office and unfinished spaces arranged around a central, U-shaped circulation corridor. The offices traditionally functioned as doctors' offices and examination rooms with some limited storage in the basement. The finishes and configuration of the one-story wing interiors closely resemble their original forms and appearance, while more liberal modifications to the two-story spine have been made to accommodate modern waiting rooms and office administration. Overall, the building is in good conditions with many original features and finishes.

Narrative Description

300 Homer Avenue has a restrained design that was typical for its architect, Birge Clark. The simplicity of the exterior finishes is contrasted with large features, such as the wood balcony overlooking the courtyard and smaller decorative features such as green scalloped wood eave molding, circular roof vents filled with overlapping Mission tiles and large window openings facing mature trees and landscaping in the examination and office rooms. Each element is part of the overall composition and is harmonious with creating a soothing, peaceful environment for the clients of the Palo Alto Medical Clinic.

The primary elevation of 300 Homer is the most articulated. The main entrance is recessed from the street wall, at the far end of a small brick and landscaped courtyard. A three-bay arched arcade shelters a series of medically themed frescos painted by famed muralist and student of Diego Rivera, Victor Arnautoff. The four color frescos depict modern medical practices, including a pediatric examination, an internist using a stethoscope to examine a woman, surgery being performed with an Albee saw, and an early fluoroscope (x-ray machine). They are paired with smaller frescos illustrating like procedures used by "modern medicine's" predecessors. All are in excellent condition and have not been modified since their creation. (They remain the only public exterior fresco murals in Palo Alto). Wood double doors with five horizontal lights open into the clinic lobby. The original herringbone pattern brick floor of the loggia is intact on both sides, but the center section has been changed to cement for handicapped entry.

The original primary entrance to the building is centered on this wall, surrounded by frescos. On the exterior wall, centered above the arch columns, are four painted medallions depicting Lister, Hippocrates, Pasteur and Roentgen, also completed by Arnautoff. Above the arcade is a cantilevered wood balcony supported by rusticated beams (visible from below) with carved ends. Similar beams and decorative ends are used to support the roof above the balcony. The balcony runs the length of the central spine and is accessed through two pairs of multi-lite wood French doors. (A multi-lite steel window of the same dimensions has replaced a third pair of French doors). Eight square wood posts with simple wood brackets support the roof and a low railing and turned wood balustrade. The balustrade is composed of three styles of randomly mixed turned wooden balusters. The courtyard is bounded on the remaining two sides by the original one-story clinical wings. These elevations have a mirrored fenestration pattern of different modulations of the multi-lite steel window form found throughout the structure. Each window is recessed into the concrete wall with a simple slightly projecting concrete sill. These windows are currently covered with plywood. The one-story wings terminate their gable ends at the street wall. These facades are similar in composition, with a central door or window (originally a door but converted to a window by 1959), flanked by two larger windows and topped by a circular roof vent opening centered under the roof peak. (See Continuation Sheets)

8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing)

- A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations

(Mark "x" in all the boxes that apply)

Property is:

- A owned by a religious institution or used for religious purposes.
- B removed from its original location.
- C a birthplace or grave.
- D a cemetery.
- E a reconstructed building, object, or structure.
- F a commemorative property.
- G less than 50 years old or achieving significance within the past 50 years.

Areas of Significance

(Enter categories from instructions)

A - Development of healthcare in Palo Alto; first group medical practice in Palo Alto

C - Architecture/Design

Period of Significance

A 1932-1999

C 1932

Significant Dates

1932 - Date of Construction

1947 - U-shaped addition added at rear (wings now removed)

Significant Person

(Complete only if Criterion B is marked above)

Cultural Affiliation

Architect/Builder

Birge Clark, Architect

Wells P. Goodnough, Builder

Period of Significance (justification)

The period of significance encompasses the building's period of use by the Palo Alto Medical Clinic. It spans from construction of the original clinic building to the year the clinic vacated the property (1932-1999).

Criteria Considerations (explanation, if necessary) N/A

Statement of Significance Summary Paragraph (provide a summary paragraph that includes level of significance and applicable criteria)

The Palo Alto Medical Clinic building at 300 Homer Avenue in Palo Alto, California was the home of the first multi-specialty group practice in the community, founded in 1932. The Palo Alto Medical Clinic was a leader in advancing Palo Alto's health care resources and, from the beginning, introduced new ideas and medical technology to the practice of medicine both in Palo Alto and to the Bay Area. The clinic's founders pioneered a model of group practice in the community that, though at first controversial, would later become common within the healthcare community nationwide. The clinic was one of the first in the region to offer a specialist in obstetrics and the first to offer a specialist in pediatrics. One of Palo Alto's first female physicians was also a founding member of the practice. Known today as the Roth Building, the building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto. The organization's long-term commitment to innovative community healthcare and research laid the foundations for the progressive healthcare network that thrives in Palo Alto today.

Founded by Palo Alto's beloved Dr. Russell Lee, the Palo Alto Medical Clinic group practice built its first clinic building in 1932. The new building, designed by architect Birge Clark, was constructed in the Spanish Eclectic style, the architectural style for which he is best known. A unique feature of the building is the series of fresco paintings, completed by noted Depression-era muralist Victor Arnautoff, that decorate the wall face around the front entry. They are the only known exterior frescoes visible to the public in Palo Alto. Many of the building's original decorative and functional features are still extant and some, especially the frescoes themselves, are of high artistic value to the community. Interior features unique to the function of the building as a medical clinic are also still intact including the physicians' offices, examination rooms, and accompanying original finishes as well as the "in use" lights above the examination room doors along each corridor of the original clinic. As such, the building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect and artist and a resource displaying high artistic value.

Narrative Statement of Significance (provide at least one paragraph for each area of significance)

THE BEGINNINGS

Dr. Russel Lee, the founder of the Palo Alto Medical Clinic, was born in Spanish Fork, Utah in 1895 as one of eight children.¹ He came to California in 1913 to study chemical engineering at Stanford University and, to earn his living expenses, took a job washing glassware for Hans Zinsser, the first professor of bacteriology at Stanford. Inspired by the professor's work, the young student switched to pre-med and studied at Stanford for three years before he transferred to the University of California in 1913 when he got a job in the State Hygiene Laboratory in Berkeley.²

Lee completed his pre-med degree at Berkeley and moved back across the Bay to complete his medical degree at Stanford University Medical School, then located in San Francisco. In 1920, having earned his M.D. at Stanford, Dr. Lee entered into private practice with San Francisco internist Dr. Harold Hill. In 1924, Dr. Lee accepted an offer to go into partnership with Dr. Thomas Williams in Palo Alto. The doctors initially worked out of Dr. Williams' office building at the corner of Bryant Street and Hamilton Avenue in Palo Alto (601 Bryant).³ It was out of this early partnership that the seeds of the Palo Alto Medical Clinic began to grow.

From the beginning of this joint venture, the two doctors had a tremendous workload. In an attempt to stem the tide of incoming patients, Dr. Lee raised the price of care. He famously stated, "I didn't particularly enjoy obstetrical practice, so I upped my delivery fee from \$35 to \$100. This immediately quadrupled my practice. My patients said, 'If he charges that much, he must be pretty good.'" The practice quickly grew to a point where the two men could not handle it alone and their practice soon grew with the addition of surgeon-obstetrician Dr. E. B. (Fritz) Roth in 1925 and pediatrician Dr. Esther B. Clark in 1927. At the time that she joined, Dr. Clark was the only pediatrician between San Francisco and San Jose.⁴ Dr. Wilbur, a surgeon who had spent time training at the Mayo Clinic, was added to the practice in 1930.⁵ (See Continuation Sheets).

Developmental history/additional historic context information (if appropriate)

¹ *Palo Alto Medical Foundation House Report*, "Russ Lee - 'He Was the Person With Vision'," (Vol. 1, No. 1, 29 January 1982), 1.

² *Ibid.*, 3.

³ *Ibid.*, 3. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

⁴ R. Hewlett Lee, M.D., "Historical Notes on the Palo Alto Medical Clinic (Revised in part from notes of Russel V. Lee, M.D.)", (11 September 1989), 1-2.

⁵ *Palo Alto Times* (Palo Alto, CA), "Dr. Blake Wilbur dies; surgeon for 49 years," 11 March 1974. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets) See Continuation Sheets for list of references.

Previous documentation on file (NPS):

- preliminary determination of individual listing (36 CFR 67 has been requested)
- previously listed in the National Register
- previously determined eligible by the National Register
- designated a National Historic Landmark
- recorded by Historic American Buildings Survey # _____
- recorded by Historic American Engineering Record # _____

Primary location of additional data:

- State Historic Preservation Office
 - Other State agency
 - Federal agency
 - Local government
 - University
 - Other
- Name of repository: **Palo Alto Historical Association archives**

Historic Resources Survey Number (if assigned): Antonio Aguilar of the NPS determined that the property "appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the SHPO according to the procedures set forth in 36 CFR Part 60 (12.06.2007, Project # 21121).

10. Geographical Data

Acreage of Property Less than an acre.
(do not include previously listed resource acreage)

UTM References

(Place additional UTM references on a continuation sheet)

1	<u>10</u>	<u>574680</u>	<u>4144250</u>	3	<u> </u>	<u> </u>	<u> </u>
	Zone	Easting	Northing		Zone	Easting	Northing
2	<u> </u>	<u> </u>	<u> </u>	4	<u> </u>	<u> </u>	<u> </u>
	Zone	Easting	Northing		Zone	Easting	Northing

Verbal Boundary Description (describe the boundaries of the property)

The Palo Alto Medical Clinic (Roth) Building is located at 300 Homer Avenue in the City of Palo Alto, County of Santa Clara, State of California, on: A portion of Lot 1 in Block 24 as shown upon that certain map entitled "University Park," which was filed for record in the office of the Recorder of the County of Santa Clara on February 27, 1889, in Book D of Maps, page 69, more particularly described as follows:

Beginning at the intersection of the northeasterly line of Bryant Street, 60 feet wide, with the southeasterly line of Homer Avenue, 60 feet wide; thence along said southeasterly line of Homer Avenue, North 39 degrees, 20 minutes, 51 seconds East 140.00 feet; thence parallel with the northeasterly line of Bryant Street, South 50 degrees 40 minutes 04 seconds East 125.00 feet; Thence parallel with the southeasterly line of Homer Avenue, South 50 degrees 20 minutes 51 seconds West 140 feet to the northeasterly line of Bryant Street; thence along said northeasterly line, North 50 degrees 40 minutes 04 seconds west 125.00 feet to the Point of Beginning.

The portion of Lot 1, Block 24 that is occupied by the subject property is referred to as Parcel B. Said parcel contains 17,500 square feet more or less. The Santa Clara County Assessors Property Number for the subject property is APN 120-17-093 (a portion).

Boundary Justification (explain why the boundaries were selected)

The building is located within a large parcel of land formerly owned and developed by the Palo Alto Medical Clinic. The boundary includes property now owned by the City of Palo Alto and under long-term lease to the Palo Alto History Museum. The boundaries of the lot currently occupied by subject property encompass the building and the site immediately surrounding the building envelope.

11. Form Prepared By

name/title Palo Alto History Museum assisted by Sarah Hahn and Becky Urbano, Architectural Historians
organization Garavaglia Architecture, Inc. date 11/17/2009
street & number 1 Sutter Street, Suite 910 telephone (415) 391-9633
city or town San Francisco state CA zip code 94104
e-mail sarah@garavaglia.com

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A **USGS map** (7.5 or 15 minute series) indicating the property's location.
A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Continuation Sheets**
- **Additional Items:** (Check with the SHPO or FPO for any additional items)

Photographs:

Submit clear and descriptive black and white photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger.

Name of Property: Palo Alto Medical Clinic

City or Vicinity: Palo Alto

County: Santa Clara

State: CA

Photographer: George Koerner (all original digital image files held by photographer)

Date Photographed: Various, see matrix.

Description of Photograph(s) and number:

Photo Number	Photo Date	Photo Description
0001	14 March 2009	Northwest (front) elevation; camera facing southeast.
0002	20 November 2009	Northwest (front) elevation, showing front gable ends; camera facing south.
0003	20 November 2009	Northeast (side) elevation; camera facing southeast.
0004	14 March 2009	Southeast (rear) elevation; camera facing north.
0005	20 November 2009	Southwest (side) elevation; camera facing east.
0006	20 November 2009	Setting; camera facing northeast.
0007	9 Nov 2009	West corridor; camera facing northwest toward front of building.
0008	9 Nov 2009	Room 114, Office overview; camera facing west.
0009	9 Nov 2009	Room 138, Examination room; camera facing west.
0010	9 Nov 2009	Rear stairwell; camera facing southeast.
0011	9 Nov 2009	Mural: Pediatric Examination; camera facing northeast
0012	9 Nov 2009	Mural: Women's Health Examination; camera facing northeast

0013	9 Nov 2009	Mural: Albee Saw; camera facing southwest
0014	9 Nov 2009	Mural: Fluoroscope examination; camera facing southwest
0015	9 Nov 2009	B&W Murals – Right of entrance; camera facing southwest
0016	9 Nov 2009	B&W Murals – Left of entrance; camera facing northeast
0017	14 March 2009	Medallion: Lister; camera facing southeast
0018	14 March 2009	Medallion: Hippocrates; camera facing southeast
0019	14 March 2009	Medallion: Pasteur; camera facing southeast
0020	14 March 2009	Medallion: Roentgen; camera facing southeast
0021	14 March 2009	Courtyard detail; camera facing southeast

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, PO Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

**United States Department of the Interior
National Park Service**

Palo Alto Medical Clinic
Santa Clara County, CA

**National Register of Historic Places
Continuation Sheet**

Section number 7 Page 1 of 3

DESCRIPTION (continued)

The northeast elevation of 300 Homer Avenue is largely devoid of the decorative detailing found within the central courtyard. The stucco wall plane is broken by large window openings (all covered with plywood) and the same slightly projecting sills found in the courtyard. At the rear of this elevation, along the two-story spine, the wall is solid with no window or door openings.

The southeast elevation (rear) of the building has a more modern stucco finish as the result of the recent removal of two later additions to the building. These wings connected to the building along the central spine. They were removed, and the surface was finished with a modern interpretation of the original stucco finish and scored to approximately indicate the former floor levels of the removed building sections. The remaining windows on this elevation are associated with the central circulation stair and elevator core and are a mixture of two arrangements of steel casements similar to the rest of the building and two arrangements of glass block.

The final elevation is the southwest elevation facing Bryant Street. This street façade is quite different from the formal Homer Avenue entry. The Bryant Street side of the building was used for supply deliveries and other functional, non-public activities. Toward the rear, as part of the two-story spine, a projecting one-story gable roof extends to the street wall. It is access by a small entry porch with a single wood column, with wood brackets at the porch roof. It is similar, although simpler in composition, to the courtyard balcony. The remainder of the elevation is marked by a series of multi-lite steel casement windows arranged similarly to those on the northeast elevation. This section marks the street-facing wall of the southern one-story wing.

Detailed Description - Interior

The interior of 300 Homer continues to exemplify the building's history as a medical clinic. Its first floor areas are arranged in a series of small examination rooms and office spaces that are both interconnected and accessed by a central hallway. Many of these rooms still retain their original finishes while others have been modified, but traces of the original materials remain. Generally, the building is divided into three types of spaces – doctors' offices, administrative spaces and patient care areas.

Today, the primary entrance through the courtyard opens into a small foyer flanked by two smaller rooms and facing a series of very small rooms used for storage or as restrooms. Beyond this entry point, a modern reception desk and waiting room has been created by combining a series of the original laboratory and examination rooms at the rear of the building. Originally, the front doors opened to a large foyer and reception area with a black and rust colored clay tile floor. Beyond the reception area are the 1947 terrazzo Streamline Moderne stairs. They begin in the basement and rise to the second floor. The balusters are matte finish aluminum with a graceful walnut handrail bending at each landing. Slightly less ornate stairs continue on to the top of the elevator tower where the original machinery and switch panels remain in place. These stairs are lighted by the use of glass brick windows and original lighting fixtures. The adjacent Otis elevator was operable when the clinic moved out in 1999. Original center-opening doors remain on each floor. The elevator car has wood paneling with horizontal aluminum bands and rounded Moderne corners. Beyond the modern waiting room areas, an open, unfinished space marks the location of the central two-story spine. This area was formerly connected to two 1947 rear wings and to an adjacent building via a short hallway. These later additions and features were removed in 2003 and the space was left unfinished.

Off the open unfinished central spine, two perpendicular hallways provide access to the one-story wings. Each of these wings is dedicated to doctors' offices and examination rooms of various types. Many of the original offices retain their Flexwood wall paneling, decorative radiator plates, Art Nouveau door and window hardware and built in cabinetry. These highly refined rooms are generally arranged to face one another across the central hallway. They are spread out throughout the one-story wings. Between the offices are small examination rooms. The original black and white tile backsplashes, hexagonal tile counters, black porcelain soap dishes and glass shelf brackets and sinks remain in several of the examination rooms. The rest

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have been replaced in whole or in part with c.1960s equivalents. Each of these rooms originally had a door that opened to a small hallway with access to a shared water closet. Generally two rooms shared a single water closet. Original restrooms are finished with green floor tile. Today, most of the restrooms have their original tile but the fixtures have been replaced. Where examination rooms have been combined, the restrooms have been removed or allocated to access to a single examination room. All of the restrooms in the two single-story wings retain all or a significant portion of their original finishes.

The second floor consists of another open unfinished space along the central spine with a suite of offices and examination rooms toward the front of the buildings. These rooms were finished after original construction, but before the rear additions were added. As such, they exhibit slightly later finishes, but these finishes are original to the spaces. They consist largely of bleached wood paneled walls in the rooms and painted white wallboard in the hallways and restrooms. The entire suite is carpeted and shares a single waiting room that opens onto the balcony. Some walls have been relocated since original construction but the suite, in general, remains in its original configuration.

Beyond the functional features of each room, the interior retains a good representation of period fixtures and lighting. On the first floor, small semi-circular globes are placed above each doorway of the original examination rooms. While no longer functional, they were used to indicate whether the patient had been seen or not, or if they needed assistance. A corresponding switch was placed in each room to activate the light. On the second floor, light fixtures consisting of concentric rings of white metal are found in the office suite. They appear to date to the original finishing of the spaces in 1937. Drawer pulls, solid wood doors, doorknobs and plates, window hardware and switch plates remain, providing an authentic aesthetic to the entire space.

Alterations

300 Homer Avenue was originally constructed in 1932 as a medical clinic. At that time the building was a U-plan design with a two story, hip-roof spine and two one-story gable roof wings. The first floor housed the medical clinic and the smaller second floor contained an unfinished office suite. This suite was completed in 1937 to accommodate additional doctors' offices and examination rooms.

In 1947, the building was greatly expanded by the construction of a U-plan addition that connected at the rear of the building. Designed by the original architect, Birge Clark, this new construction was a full two-stories in height and consisted of a new two-story spine and two, two-story wings. The spine contained a new circulation core consisting of a Moderne-style Otis elevator and three-story terrazzo, metal and oak stair. The rest of the work was executed in mostly mass-produced materials and had greatly simplified interior finishes and detailing. The resulting structure had an H-plan and housed a number of additional medical services including expanded x-ray and surgery capabilities.

Additional room was needed as the clinic continued to expand. In 1961, a new building was constructed just east of 300 Homer Avenue on the site of the current playground. Known as the Lee Building, it was larger in size than 300 Homer Avenue. An opening was cut into the east wall of the 1947 spine to accommodate a hallway to connect the two buildings. At this time, the courtyard entry ceased to be the primary patient entry point. The lobby was converted into a nurses' station and this is the configuration that remains today.

The Palo Alto Medical Foundation (formerly the Palo Alto Medical Clinic) operated the facility until 1999 when they sold the property to the City of Palo Alto. In 2000, the Lee Building was demolished and the hallway opening in the east wall of 300 Homer Avenue was filled in.

In 2003, the 1947 wings at the rear of the building were also removed. Key character-defining features of these wings were salvaged (roof tile, gutters, wood trim elements) and the 1947 spine, including the central circulation corridor was retained. This portion of the building was seismically retrofitted and left unfinished pending a new use for the building.

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Of an unknown date are the alterations that transformed the original X-ray and surgery rooms in the 1932 west wing into the examination room, office and support spaces that are currently in place. The date of conversion of the east waiting room into examination rooms and support spaces is also unknown. However, many of the existing walls and finishes appear to be original even if their former configurations have been modified.

The building's current form is approximately that of the original 1932 construction. It contains all portions from the original construction plus the form and volume of the 1947 spine. Representative rooms, displaying the original 1932 finishes and uses remain to provide a clear image of the patients' experiences and the doctors' work environments in the early years of this highly influential medical institution. The overall appearance, both inside and out, is that of an early mid-20th century medical clinic, uniquely designed to fit within the architectural traditions of Palo Alto.

CONCLUSION

300 Homer Avenue was constructed in 1932 to house the newly formed Palo Alto Medical Clinic. It has served as a medical building for this organization until its sale to the City of Palo Alto in 2000. The exterior design of the building is in keeping with the predominant architectural style executed in Palo Alto in the early part of the 20th century and the interior is specifically designed to create an efficient medical clinic operation. The decorative features throughout the building are of a high quality and design that is atypical for modern medical facilities and give 300 Homer Avenue an overall welcoming character that exemplified the Clinic's mission and dedication to the surrounding community of Palo Alto. It retains its integrity despite years of continued use as a medical facility and recent alterations to later additions to the property. While currently unoccupied, it has been stabilized and protected for future use and is subject to regular inspections and maintenance.

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NARRATIVE STATEMENT OF SIGNIFICANCE (continued)

The continued rapid growth of the practice soon necessitated the addition of more physicians. As such, Dr. Milton Saier, an internist and allergy specialist joined the practice in 1931, and Dr. Niebel, a family practitioner and specialist in anesthesiology, joined c.1932. Dr. Williams, the elder of the group, retired in 1929.⁶ In the first years of the 1930s, the evolving group practice was still operating out the crowded 601 Bryant Street location and plans were beginning to form for a new partnership and a new facility.

THE FOUNDING MEMBERS⁷

In 1932, six Palo Alto physicians formally agreed to join their practices in a new and innovative type of medical partnership in Palo Alto. The partnership agreement, just three pages long, offers little indication of how unusual their decision was at a time when many doctors viewed group practice as something close to communism.⁸ Nor does it foretell how the fledgling Palo Alto Clinic, founded in a small college town several miles south of San Francisco, would become one of the largest and most well-respected physician groups in the United States.⁹ In addition to Dr. Russel Lee, the founding members are as follows:

Dr. Edward Frederick (Fritz) Roth

Known interchangeably as "Fritz" or "Butch" by those who knew him; Dr. Roth was born in Ukiah, CA and educated at Stanford University and Stanford University Medical School, graduating from the latter in 1920. Roth later went to Boston where he received additional training in general surgery and obstetrics/gynecology. He joined Dr. Russell Lee in practice in 1925 initially handled most of the group's work in that specialty. Later, when more doctors joined the clinic, he turned to his first love, orthopedics and sports medicine. Dr. Roth was noted for his outstanding work as an orthopedist and became team physician for Stanford University in the 1930s, a position in which he continued throughout his career. Roth was a founding member of the group practice and the original clinic building at 300 Homer Avenue, the Roth Building, is named for him.

Dr. Esther Clark

Dr. Esther Bridgeman Clark, sister of famed Palo Alto Architect Birge Clark, was one of the first female doctors in Palo Alto and the first pediatrician in the Palo Alto area. Clark was born in 1900 and attended Stanford University and later Stanford University Medical School (then located in San Francisco), receiving her M.D. in 1925. She began her pediatric practice in Palo Alto after graduation and joined the Palo Alto Clinic as a partner in 1927. She joined the clinical faculty of Stanford Medical School in the 1930s and in 1953 established the Children's Health Council. Dr. Clark retired in 1972 at age 72.¹⁰

⁶ R. Hewlett Lee, M.D., "Historical Notes" (11 September 1989), 2.

⁷ Various accounts exist about the formation and development of the Palo Alto Clinic and its founding members. Some list only four founding members (Lee, Roth, Clark and Wilbur), and some as many as nine. According to the "Historical Notes," written by Dr. R. Hewlett Lee (Dr. Russel Lee's son), the group formally established itself as the Palo Alto Clinic in 1929. A 1953 *Palo Alto Times* article indicates that Palo Alto Clinic Ltd. incorporated in 1932. An August 1932 *Palo Alto Times* article entitled "Medical Staff In New Building" identifies the physicians present at the time the building at 300 Homer Avenue was originally occupied as the following: Lee, Roth, Clark, Wilbur, Saier and Niebel. These six physicians are also recognized as the founding members by the Palo Alto Medical Foundation (website) and in the publication entitled *Palo Alto Medical Clinic: the First 75 Years* by Sara Katz O'Hara. A reproduction of another formal partnership agreement, dated 1 October 1936, is shown in the latter publication on page 20 (same six doctors).

⁸ *Palo Alto Times* (Palo Alto, CA), "Redistribution of Stock Started by P.A. Clinic," 25 July 1953. Another early partnership agreement was made in 1936, see: Sarah Katz O'Hara, *Palo Alto Medical Clinic, the First 75 years*. Dr. Francis A. Marzoni, Editor, (Palo Alto Medical Foundation, Palo Alto, CA: n.d.), 20.

⁹ The Palo Alto Clinic added the word "Medical" to its title in 1955 when a law passed by the California Legislature required it.

¹⁰ *Palo Alto Times* (Palo Alto, CA), "Esther Clark," 27 March 1972. Also Online Archive of California (<http://oac.edlib.org>), Guide to the Esther Bridgeman Clark Papers (accessed 22 October 2009).

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Dr. Blake C. Wilbur

Born in San Francisco, Dr. Blake Wilbur, son of Stanford University president Ray Lyman Wilbur, attended Stanford and Harvard medical schools, graduating from Harvard in 1925. He trained at the Mayo Clinic in Rochester, Minnesota and practiced briefly in San Francisco before returning to Palo Alto in 1930. Dr. Wilbur joined the Palo Alto Medical Clinic that same year and became renowned for his work as a surgeon. For many years, he was a clinical professor of surgery at Stanford University Medical School and he practiced surgery up to the time of his death in 1974.¹¹

Dr. Milton H. Saier

Dr. Milton Saier joined the Palo Alto Clinic group practice in 1931, when the group was still operating out of an overcrowded office in a two-story house at 601 Bryant Street. Born in Fresno, California in 1902, he earned a biochemistry degree at Stanford University in 1924 and a medical degree from Stanford Medical School in 1928. Dr. Saier practiced internal medicine and specialized in allergies. When he joined the clinic, he was the only allergist between San Francisco and San Jose, and he created the first allergy department at the clinic. Dr. Saier retired in 1968.¹²

Dr. Herbert Lee Niebel

An Ohio native, Dr. Herbert Niebel graduated from Stanford University with a degree in civil engineering in 1914, and following graduation served for a period as an assistant instructor in bacteriology at Stanford. The latter experience led to an interest in clean air and water as well as a decision to enter Stanford Medical School where he received his M.D. degree in 1923. Dr. Niebel entered into private practice in Palo Alto for a time before joining the Palo Alto Medical Clinic as a general practitioner skilled in anesthesiology. He remained with the clinic until his retirement in 1956.¹³

THE EARLY YEARS

As common as it might seem today, group medical practices were relatively uncommon in 1932, when Dr. Lee and the five partners incorporated as Palo Alto Clinic Ltd.¹⁴ Group medical practices had existed in the United States from the late 1800s, when the Mayo Clinic was founded in Rochester, Minnesota. As Mayo-trained physicians spread throughout the country, some set up their own group practices. By 1932, there were approximately 125 group practices in the country, with nearly a third of them located in the Midwest.¹⁵

As medicine in the United States had traditionally been practiced on an individualized, fee-for-service basis, the early group practices that did exist were seen by many independent physicians as forms of corporate or "socialized" medicine that threatened their professional autonomy.¹⁶ At one point, a resolution was introduced in the Santa Clara County Medical Society barring any Palo Alto Medical Clinic physician from membership. This was a reaction both to the clinic's growing presence in the community, and to a 1946 agreement to provide pre-paid medical care to Stanford University students – an

¹¹ *Palo Alto Times* (Palo Alto, CA), "Dr. Blake Wilbur dies; surgeon for 49 years," 11 March 1974; *Palo Alto Times* (Palo Alto, CA), "Blake Wilbur's feted on Anniversary," 25 June 1973; *Palo Alto Times* (Palo Alto, CA), "Scholarship for Surgeons established," 13 September 1972. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

¹² *Palo Alto Daily News* (Palo Alto, CA), "D. Milton Saier, Founding Partner of Palo Alto Clinic," 1 June 1996; *San Francisco Chronicle* (San Francisco, CA), "Dr. Milton H. Saier," n.d.

¹³ *Palo Alto Times* (Palo Alto, CA), "Dr. Herbert Lee Niebel," 26 February 1979. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

¹⁴ *Palo Alto Times* (Palo Alto, CA), "Redistribution of Stock Started By Palo Alto Clinic," 7/25/1953.

¹⁵ "A Brief History of Group Practice." Palo Alto Medical Foundation, 2001 (accessed 17 November 2009).
<http://www.pamf.org/about/pamfhistory/grouppractice.html>.

¹⁶ "The 1930s: Medicine And Health: Overview." *American Decades*. The Gale Group, Inc. 2001. *Encyclopedia.com*
<http://www.encyclopedia.com/doc/1G2-3468301278.html> (accessed 17 November 2009). Also, "The Bonds of Brotherhood, Teamwork and the Group Practice." Mayo Foundation for Medical Education and Research." <http://www.mayoclinic.org/tradition-heritage/group-practice.html> (accessed 17 November 2009).

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uncommon arrangement at the time and one that many independent practitioners saw as unfairly exclusive.¹⁷ The group practice, however, became increasingly more common in the following decades and by 1969, it is estimated there were just over 6,000 group medical practices in the United States; in 1999 there were approximately 20,000.¹⁸

To accommodate the new Palo Alto Clinic's expanding operations, Palo Alto architect Birge Clark was contracted in 1931 to draw up plans for a new office and clinic building.¹⁹ The new location was designed to accommodate twelve doctors, thereby allowing for future growth. Notice of a building permit issued for the clinic was printed on the front page of the February 10, 1932 issue of *The Palo Alto Times*.²⁰ The building at 300 Homer Avenue, which was at the outer edge of Palo Alto's commercial district at the time, opened later that year.²¹ An article in the *Palo Alto Times* on August 4, 1932, described the new clinic as "a complete, self-contained unit, providing not only doctors' suites, but an X-ray department, an operating room, clinical laboratory, together with bookkeeping office and other facilities."²²

The Palo Alto Clinic was the first group medical practice in Palo Alto, and one of the earlier group practices in California.²³ Not only was the clinic a different type of medical practice than was common in those days, it was also innovative in its application of that practice. Whereas the Mayo Clinic and most other clinics of the time operated on a "referral" system, with patients referred by outside physicians for "secondary" care by a clinic's specialists, the Palo Alto Clinic's primary care physicians referred patients to specialists within the clinic if the need arose, thus providing both primary and secondary care in a single setting.²⁴

The structure and operation of the organization itself was unique as well. The clinic was organized as a partnership and in the early years each partner was assigned whatever percent of income the individual deemed appropriate for his or her services. Dr. Lee's philosophy was, "Give a guy what he wants and then make him earn it."²⁵ A separate corporation was also established by the group, in which each partner held stock, owned the real estate, the medical equipment and office furniture. Governing decisions were made as a group, with each physician's vote carrying equal weight.²⁶

Prior to Palo Alto Clinic's opening in 1932, Palo Altans' local health care options had consisted primarily of individual physicians and a one hundred-bed hospital, which was built in 1929, owned by the City of Palo Alto, and operated by Stanford Medical School. The opening of the Clinic widened the scope of medical care available in Palo Alto by having specialists, a rare feature at the time, within the Clinic's practice. Further, the group practice setting made it possible for primary doctors and specialists to easily interact with one another within the clinic when making a diagnosis of a patient.²⁷ It also allowed for new technology to be made available as it was developed, something that was often too expensive for individual doctors to afford.

¹⁷ "A Brief History of Group Practice." Palo Alto Medical Foundation, 2001 (accessed 17 November 2009).

<http://www.pamf.org/about/pamfhistory/grouppractice.html>.

¹⁸ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

¹⁹ Architectural Plans, *Office Building for Doctors Lee, Roth, Clark and Wilbur*, by Birge Clark, 19 December 1931.

²⁰ *Palo Alto Times* (Palo Alto, CA), "Three Building Permits Issued, Total \$93,400," 2/10/1932.

²¹ *Palo Alto Times* (Palo Alto, CA), "Medical Staff In New Building," 8/4/1932.

²² *Ibid.*

²³ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

²⁴ *Ibid.* Also: *Palo Alto Times* (Palo Alto, CA), Medical Insert Section, "Facility Seeks Complete Community Care," 9/15/1959.

²⁵ *Palo Alto Weekly* (Palo Alto, CA), "PA Medical Clinic Marks 50th Year," 3/13/1980.

²⁶ Sarah Katz O'Hara, *The First 75 Years*, 13.

²⁷ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

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Palo Alto, like the rest of the nation in the 1930s, felt the burden of the Great Depression. Clinic physicians often waived their fees - \$3.00 for an office visit, \$4.00 per daytime house call, and \$10.00 per nighttime house call - since many patients could not afford to pay. Some patients brought in food from their gardens to offer as compensation. After the war however, many patients returned to pay off old debts.²⁸

POST WAR BOOM

Until 1946, the Palo Alto Clinic grew at a measured pace, adding doctors as they were needed. However, the large increase in the Peninsula's population following World War II created an urgent need for more doctors and the office space to accommodate them. In 1946 alone, 12 doctors joined the staff.²⁹ The increased demand was met by the 1947 opening of a U-shaped addition, designed by the firm of (Birge) Clark and Stromquist, which attached to the rear of the 1932 building.³⁰ The rear addition tripled the clinic's capacity and was constructed for an estimated \$450,000.³¹

The clinic continued to grow, increasing the variety of specialists and services offered. A 1953 *Palo Alto Times* article noted that the Palo Alto Clinic had 1,000 patients a day filing through its doors, only one-fifth of that number coming from Palo Alto. The same article states that by 1953, the clinic had 58 doctors and new patients were being added at a rate of 1,200 per month.³²

By 1961, Palo Alto Medical Clinic (as it became in 1955 to conform to a law requiring that "medical" be added to its name) had undergone further expansion into a new building on the property, adjacent to the original Roth building.³³ The new building was named the Lee building in honor of Dr. Russel V. Lee, and the original building at 300 Homer Avenue became known as the Roth building after Dr. "Fritz" Roth.³⁴ Both buildings provided medical offices and treatment rooms for clinic doctors.

The Palo Alto Medical Clinic and the Palo Alto Medical Research Foundation were combined in 1981 to form the not-for-profit Palo Alto Medical Foundation (PAMF); the Palo Alto Medical Clinic continued to exist as a "separate for-profit corporation under the Foundation umbrella".³⁵ In 1993, the Foundation became an affiliate of Sutter Health. Today the Palo Alto Medical Foundation is one of the largest multispecialty group practices in California.³⁶

ACHIEVEMENTS

From its inception, innovation and commitment to community health care were tenets of the Clinic's philosophy. In 1946, the Palo Alto Clinic became one of the earliest medical groups to work with managed care insurance plans when it contracted with Stanford University to care for students under a prepaid medical plan. This was the first time in its history that Stanford had offered a comprehensive health service to its students.³⁷

²⁸ Palo Alto Medical Foundation website, "Depression, War and a Population Explosion," <http://pamf.org> (accessed 1 October 2008).

²⁹ Ward Winslow and others, *Palo Alto: A Centennial History*, (Palo Alto: Palo Alto Historical Association, 1st edition), 174.

³⁰ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³¹ *Palo Alto Times* (Palo Alto, CA) "Work to begin on \$450,000 Clinic Addition," 25 July 1946.

³² *Palo Alto Times* (Palo Alto, CA) "P.A. Clinic major medical center," 30 July 1953. Also, *San Francisco Examiner* (San Francisco, CA), "Palo Alto Clinic Treats 1000 A Day," 7/26/1953.

³³ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³⁴ Conversation between Dr. Robert Roth and Beth Bunnenberg, Palo Alto, CA, June 2004.

³⁵ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

³⁶ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³⁷ *Palo Alto Times* (Palo Alto, CA) "Stanford now offers students full prepaid health program," 9 April 1946.

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Known initially as prepaid health care, managed care first manifested in Southern California when the Los Angeles Department of Water and Power contracted with a local clinic to provide medical care for its workers at the rate of \$2.69 per month. Shortly thereafter, industrial baron Henry J. Kaiser made similar arrangements for workers at the Grand Coulee Dam and in his shipyards and steel mills.³⁸ Though a handful of similar plans were set up following those models, prepaid health plans did not become common until the 1970's, when the Nixon Administration announced its plan (in 1971) to fund the development of prepaid health maintenance organizations or HMOs.³⁹

The agreement between Stanford and the clinic was that the clinic would provide medical care for all university students for an advance fee of \$5.00 per semester, taken out of tuition. This was the first prepaid medical care plan on the Peninsula and it initially caused a stir with the Santa Clara County Medical Society, prompting unsuccessful efforts to remove the clinic doctors from the membership organization. A similar prepaid plan was developed by the Clinic in the 1950's for Stanford faculty and staff.⁴⁰

In 1950, the Clinic became one of the first facilities in the country to offer radiation therapy for cancer patients in an outpatient setting. In the same year the Clinic founded the Palo Alto Research Foundation, a separate legal entity, located in a separate building.⁴¹ Originally conceived to provide Palo Alto Clinic doctors with the opportunity to engage in medical research, it instead developed into a facility for scientists doing basic research; research that has produced a number of medical advances.⁴² Clinic doctor Esther Clark established the Children's Health Council, as a separate entity, to care for disabled children in 1953.⁴³ Dr. Lee had long fostered an interest in care for the aged and in 1964, founded the retirement community Channing House, providing lifetime medical care by Palo Alto Medical Clinic's doctors. Both the Children's Health Council and Channing House were established with the help of the Palo Alto Clinic founded not-for-profit Medical Research Foundation.⁴⁴

Dr. Russel V. Lee had long supported pre-paid health care and was a national advocate for the development of group practice. In 1951, he was appointed to President Truman's Commission on Health Needs of the Nation, which proposed a plan that later became a basis for Medicare.⁴⁵

The Clinic also "served as a model for other nascent medical groups. Indeed, Dr. Lee claimed that the first partnership agreement of the Permanente system - 'was worked out in my living room right after the war'."⁴⁶ The desire to bring innovative medical approaches and new technology to the community was an original goal of the Palo Alto Medical Clinic that still continues today. Examples are: the first mammography machine on the West Coast purchased in 1965, the pioneering in the early 1970's of outpatient surgery to reduce hospital stays, and, also in the 1970's, the establishment of one of the first stand alone Sports Medicine Departments in the United States.⁴⁷ This department was rooted in the work and interest of one of the Clinic's founders, Dr. "Fritz" Roth.⁴⁸

³⁸ Palo Alto Medical Foundation website, "Early Experiments With Managed Care," <http://pamf.org> (accessed: 10.23.2009).

³⁹ Ibid.

⁴⁰ Palo Alto Medical Foundation website, "Early Experiments With Managed Care," <http://pamf.org> (accessed: 10.23.2009).

⁴¹ Ibid.

⁴² Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

⁴³ Ward Winslow and the Palo Alto Historical Association, *Palo Alto: A Centennial History* (Palo Alto: Palo Alto Historical Association, 1993), 179.

⁴⁴ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

⁴⁵ Article: "Dr. Russel V. Lee: A Radical or Simply Ahead of His Time," no date. Palo Alto Historical Association files.

⁴⁶ Ibid.

⁴⁷ "Timeline: 1930-2005." Palo Alto Medical Foundation (website). <http://www.pamf.org/about/pamfhistory/timeline.html> (accessed 17 November 2009).

⁴⁸ *Palo Alto Times* (Palo Alto, CA), "Letter from Russell V. Lee, Dr. Roth Linked Two Medical Eras," 4/6/1972.

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Over the years, the Palo Alto Medical Foundation had expanded into various neighboring buildings. A decision was made to consolidate these facilities, and in September 1999, most of the facilities had been moved to a new building and campus in Palo Alto, approximately five blocks from its original home. The obsolete property of the Medical Foundation was sold, including the Roth building, which the City of Palo Alto purchased in 2000.

The Palo Alto Medical Clinic's group medical practice was a forerunner in the evolution of Palo Alto as a progressive medical center. In 1959, in conjunction with the construction of a new hospital owned jointly by Palo Alto and Stanford University, Stanford moved the campus of its medical school in San Francisco to Stanford's main campus in Palo Alto. The Stanford Lane Hospital was also moved from San Francisco and to the new Palo Alto/Stanford Hospital at that time. The Palo Alto Medical Clinic's long-standing and mutually beneficial relationship with Stanford University and its medical school played a significant role in facilitating this move.

In the late 1960s, Stanford University bought out the City of Palo Alto's interest in the above-mentioned hospital and subsequently embarked on an extensive medical expansion program that has continued into the 2000's. A number of other medical facilities were subsequently developed. Among them were the Veteran Affairs Hospital, which opened on Stanford land adjoining Palo Alto's border in 1960, the Peninsula Children's Center (1960), and the Community Association for the Retarded (1963). Interplast, Inc., providing free reconstructive surgery in third world countries, was founded in Palo Alto in the late 1960's.⁴⁹ Today the Palo Alto Medical Foundation, Stanford University Medical complex, and groups of individual physicians, form Palo Alto's health industry - an industry which attracts regional, and to some degree, national and international patients.

PALO ALTO MEDICAL CLINIC BUILDING

The Palo Alto Medical Clinic building is an excellent example of the Spanish Eclectic style of architecture and retains many interesting decorative and functional features from its original conception. Birge Clark, an architect of major local importance, designed the building in 1931-32 in the architectural style for which he is best known. Victor Arnautoff, a depression era artist of note in the Bay Area, painted the frescos at the entryway. They are the only known exterior frescoes visible to the public in Palo Alto.

Birge Clark

Birge Clark (1893-1989) was a significant Palo Alto architect whose work had a major impact on the City of Palo Alto. Paula Boghosian, an architectural historian, in 1979 wrote in *Historical and Architectural Resources of the City of Palo Alto* that Birge Clark's "Spanish Colonial Revival designs are largely responsible for the coherent Spanish Colonial Revival image of much of Palo Alto and for the consistency between the downtown commercial area and the Spanish Colonial Revival residential neighborhoods of the town."⁵⁰

A lifelong resident of Palo Alto, Clark earned an undergraduate degree from Stanford University, graduating in 1914 with a major in art and a minor in engineering. He earned his master's degree in architecture from Columbia University. Birge Clark used many architectural styles for his commercial and residential buildings but is best known for the Spanish Eclectic style, or what he called California Colonial.⁵¹ His three National Register listed buildings and all of his buildings in the National Register-listed Ramona Street Architectural District were designed in this style.⁵² It is also in this same style that the Roth building was designed at the height of Birge Clark's Spanish Eclectic period.

⁴⁹ Ward Winslow and the Palo Alto Historical Association, *Palo Alto: A Centennial History* (Palo Alto: Palo Alto Historical Association, 1993).

⁵⁰ Paula Boghosian, Architectural Historian, *Historical and Architectural Resources of the City of Palo Alto* (1979), 13.

⁵¹ *San Francisco Chronicle* (San Francisco, CA), "Peninsula Architect Birge Clark, 96," 3 May 1989.

⁵² The listed National Register properties designed by Birge Clark are the Norris House, Dunker House and the U.S. Post Office building in Palo Alto.

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According to Birge Clark's memoirs, at the time they began planning the new clinic building in 1931, clinic physician Russell Lee was in favor of using the Art Moderne style of architecture. Though the architect made a number of sketches for a Moderne building, he advocated for a design in the California Colonial style that he felt more comfortable with. As stated in his memoirs, he felt that, "the 'moderne' was still in its infancy at best and would probably change a good deal as time went on, while the California Colonial was a developed, mature style with its tile roofs, thick walls, wrought iron, balconies [and] arches."⁵³ After much debate, the doctors settled on the "California Colonial" or Spanish Eclectic style promoted by Birge Clark and the building was completed in 1932.

Birge Clark, and his architecture firm Clark & Stromquist, was employed by the Palo Alto Medical Clinic to design numerous projects over the years including a small office building at 321 Channing and the two-story rear addition to the Clinic building in 1946. They also finished the interiors on the second floor of the original clinic building in 1937. The last large addition, added in 1969, was completed in a more modern style than the first portions of the building, as it was intended to be the first three stories of a nine-story high rise.⁵⁴

As is evident today, the building combined a commercial use with a predominately residential-type exterior design. Employing two single-story wings enclosing a courtyard with a mature oak tree, and using residential scale doors and windows, and French doors opening onto a gallery on the front elevation of the recessed second story, Birge Clark enabled the Roth building to blend into its residential surroundings. Additionally, the familiar architectural style made the building comfortable and inviting to patients who had, up to that point in time, largely been treated by medical practitioners working out of their own homes.

Victor Arnautoff

In 1931, Dr. Russell V. Lee commissioned Russian artist Victor Arnautoff (1896 – 1979) to paint the fresco murals around the front entry to the new Clinic building. Alfred Frankenstein, *San Francisco Chronicle's* long-time art critic, described Arnautoff in 1955 as "one of the best mural painters in the United States."⁵⁵ Arnautoff was born in Russia in 1896 and emigrated to Mexico in the early 20th Century where he studied mural painting and became an assistant to Diego Rivera in the late 1920s. In 1931, he came to San Francisco and worked with Rivera on the mural commissioned for the San Francisco Art Institute.⁵⁶ Arnautoff also studied art at the California School of Fine Arts in San Francisco.

His first solo commission in California was for the Palo Alto Clinic, which was completed in 1932.⁵⁷ In 1933-34 Arnautoff was chosen by the Works Progress Administration as one of the artists for the murals at Coit Tower in San Francisco. Some of his other murals include the large fresco in the Main Post Chapel in the Presidio (1935) as well as frescoes in high schools and other buildings in the Bay Area. Arnautoff taught art at Stanford University from 1939 until his retirement in 1963 after which he returned to Russia, where he lived out his life.⁵⁸

The Roth building's frescoes have a medical theme contrasting modern medicine with earlier medical methods. There are four fresco panels in color. Three of these panels depict the modern medical branches of pediatrics, surgery, and internal medicine, and include three doctors whose contributions to modern medicine Dr. Lee felt were most important. The fourth panel depicts modern technology.

Underneath each of the colored fresco panels is a smaller monochromatic panel depicting a contrasting primitive method of treatment. Beginning on the left of the entrance wall, the first colored fresco is of Emmett Holt (1855-1924) a distinguished

⁵³ *An Architect Grows up in Palo Alto: Memoirs of Birge Malcom Clark, F.A.I.A.*, (typescript: 1982), 69.

⁵⁴ *Ibid.* The nine-story addition was never constructed.

⁵⁵ *News and Notes – Medical Murals*, Palo Alto Medical Clinic, August 1959. Also, *San Francisco Chronicle* (San Francisco, CA), "Artists Can Do Better Than A Dick McSmear," 10/3/1955.

⁵⁶ Stanford Historical Society, *Memorial Resolution: Victor Arnautoff (1896-1979)*, n.d.

⁵⁷ *Ibid.*

⁵⁸ "The Chapel, Hallowed Ground" at: http://www.interfaith-presidio.org/the_chapel.html (accessed 10.19.2009). Also "Victor Arnautoff, 1896-1979," at: <http://www.helfenfinearts.com/biogs/arnautoffFset.html> (accessed 10.19.2009).

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American pediatrician and a pioneer in children's diseases. The monochromatic panel beneath him has a Flathead Indian pressing a board against an infant's head to produce a sloping forehead, believed to be a sign of intelligence. The next color panel, located between the window and door, is of Sir William Osler (1849-1919) a Canadian internist, highly regarded teacher and writer on medicine. His contrasting monochromatic panel depicts a witch doctor exorcising evil spirits. The third colored panel, to the right of the entrance door, is of Harvey Cushing (1869-1939) a Boston neurosurgeon who refined the use of the Albee saw. Beneath him the monochromatic fresco is of a wound being cauterized with a hot poker. The final color panel, between the right window and far wall, shows an early form of x-ray, a fluoroscope, being used. This panel is in contrast with the monochromatic fresco beneath depicting the use of horoscopes to diagnose illness.

Underneath each window on the entrance wall is a monochromatic fresco with a reclining man and woman. The left-hand fresco depicts the woman holding a scythe and the man a set of scales; in the right-hand fresco the woman holds a laurel wreath and the man a sword. Beneath the windows on the two end walls of the entrance loggia are monochrome frescoes depicting the modern microscope and Bunsen burner (left end) and the old remedies of herbs and roots (right end). Above the entrance door is a narrow monochromatic fresco with a skull and a snake surrounded by books representing knowledge.⁵⁹

Arnautoff's cohesive design integrated the frescoes with the wall's fenestration and door to produce a unified, rhythmic, and forceful composition. The predominant colors in the murals echo the warm tones of the red clay tile roof, the blue green tones of the cornice molding, window and door trim, and the beige tones of the medallions. Similar colors appeared on the interior in the original tile floors, warm Flexwood walls and the beige window sill tiles. His subject matter emphasizing the advancement of modern medicine and technology was appropriate for a newly opened medical building, and the depiction of pediatrics, internal medicine, surgery, and x-ray technology focused on the broad range of medical care that was available at the Palo Alto Clinic.

The murals caused a minor scandal when the clinic building opened in 1932, due to depictions of several patients receiving medical care in a state of partial undress. Palo Alto's reaction was so intense that the controversy was covered in San Francisco newspapers. Under the title, "Murals and Morals: Palo Alto's Pulse Quickens," a San Francisco Chronicle reporter wrote, "The builders, aided and abetted by the nationally known doctors who make up the staff, have gone in for art in a big way, and the startling result has set this little college town by the ears!" The article continued to state that, "the consensus is that a clinic ought to be a clinic, and not an art gallery. Especially a modern art gallery!"⁶⁰ On the first Sunday after the murals were unveiled, the steady stream of townspeople driving along Homer Avenue to see the mural for themselves caused a traffic jam and clinic surgeon Fritz Roth threatened to have the walls whitewashed before he would move in. In time, the uproar faded away and the artwork became a fixture.⁶¹

CONCLUSION

From its conception, the Palo Alto Clinic was a leader in advancing Palo Alto's health care resources. The early group practice introduced new innovations in the practice of medicine and the use of new medical technology to both in Palo Alto and the Bay Area. It drew patients not only from the immediate community but from throughout the Peninsula, featured specialists as part of the Clinic's practice, and attracted accomplished physicians from around the nation that were interested in the Clinic's facilities and its use of new technology. The legacy of the Palo Alto Medical Clinic is closely associated with the long pattern of events that helped to establish Palo Alto's health care industry as one of the leading medical networks in the country.

⁵⁹ *News and Notes*, Palo Alto Medical Clinic, 1959.

⁶⁰ *San Francisco Chronicle* (San Francisco, CA), "Paintings of Semiconnudes In Clinic Stir Palo Alto", 21 August 1932.

⁶¹ Palo Alto Medical Foundation website, "A Moral Dispute Over Murals," <http://www.pamf.org/about/pamfhistory/moral.html> (Accessed 10.20.2009).

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300 Homer Avenue was constructed in 1932 to house the newly formed Palo Alto Medical Clinic. It served as a medical building for this organization until its sale to the City of Palo Alto in 2000. The Spanish Eclectic style was the architectural style of choice in Palo Alto throughout the early part of the 20th century and the interior was specifically designed to form an efficient medical clinic operation. The decorative features throughout the building are of a high quality and design that is atypical for modern medical facilities, imparting an overall welcoming character that exemplified the Clinic's mission and dedication to the surrounding community of Palo Alto. Overall, the building retains a high degree of integrity despite years of continued use as a medical facility. The architectural design and historic character of the original clinic building is still intact, despite removal of the later rear wings.

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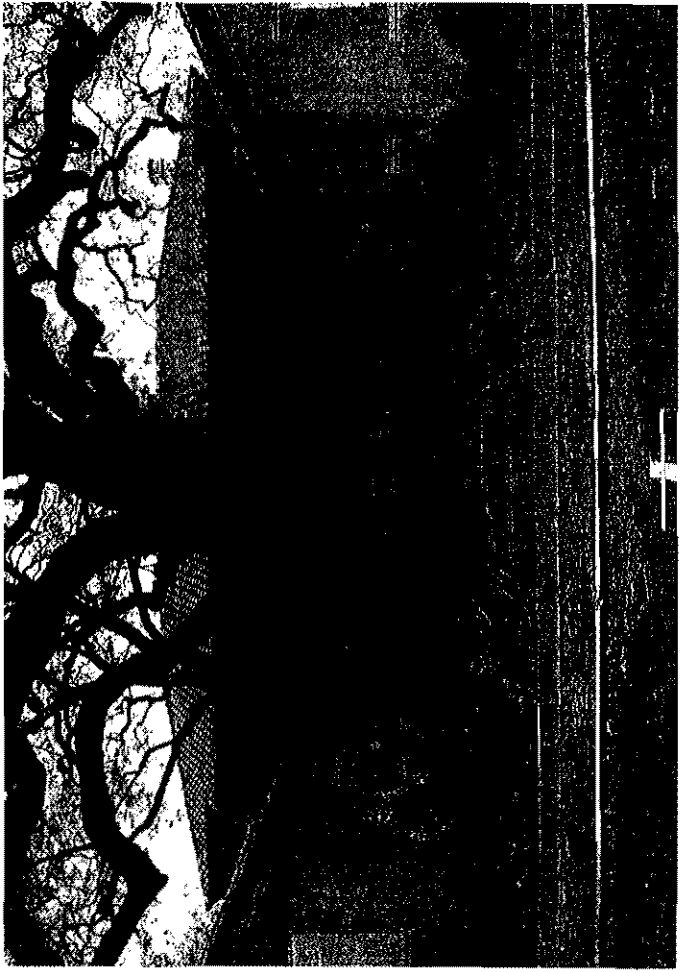
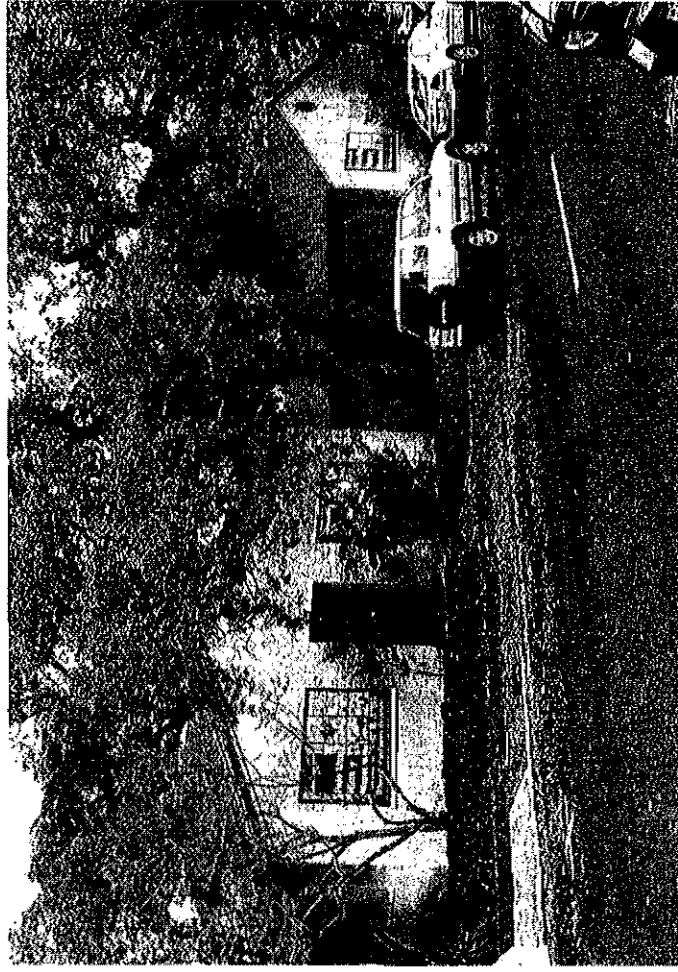
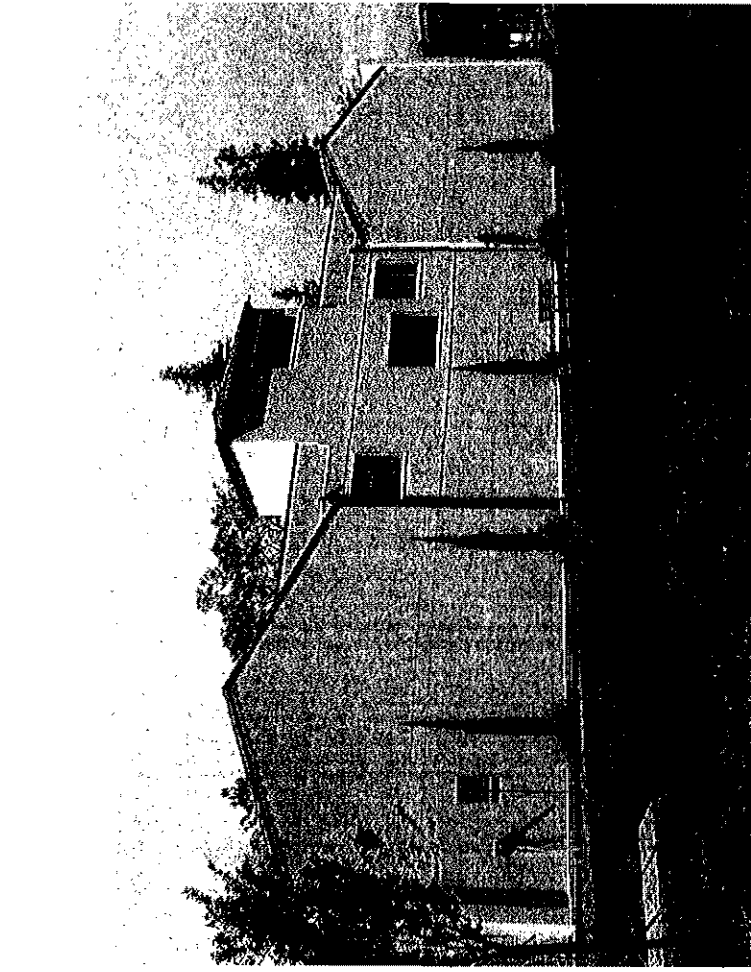
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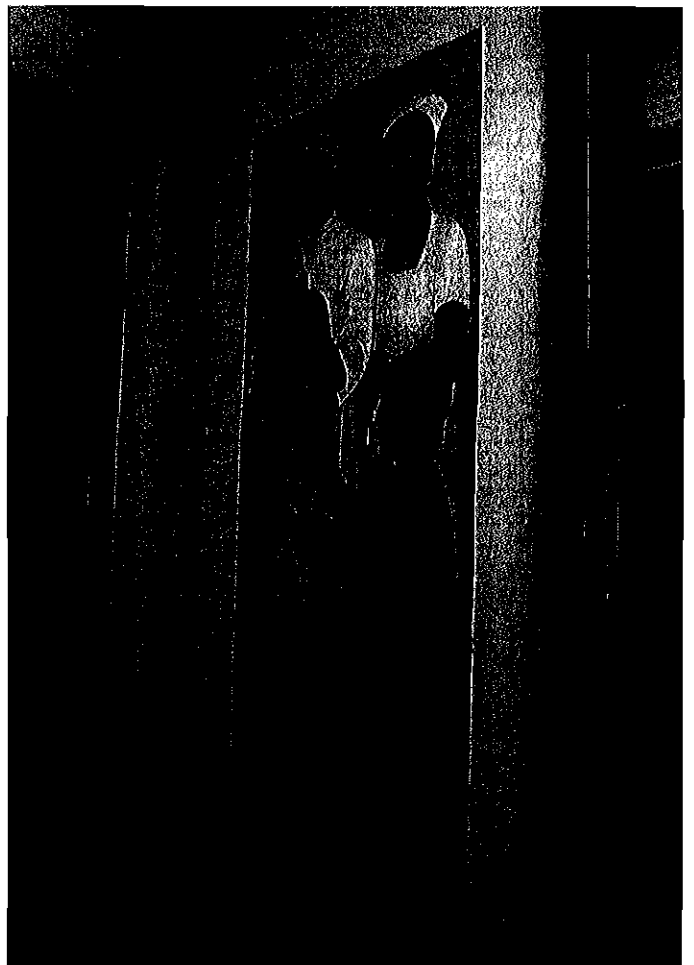
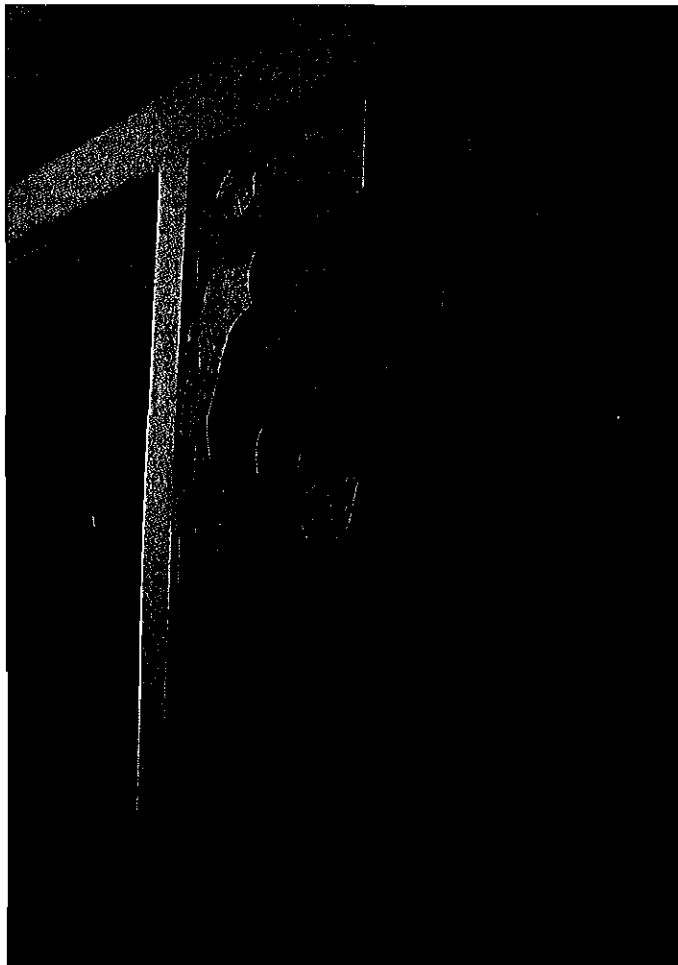
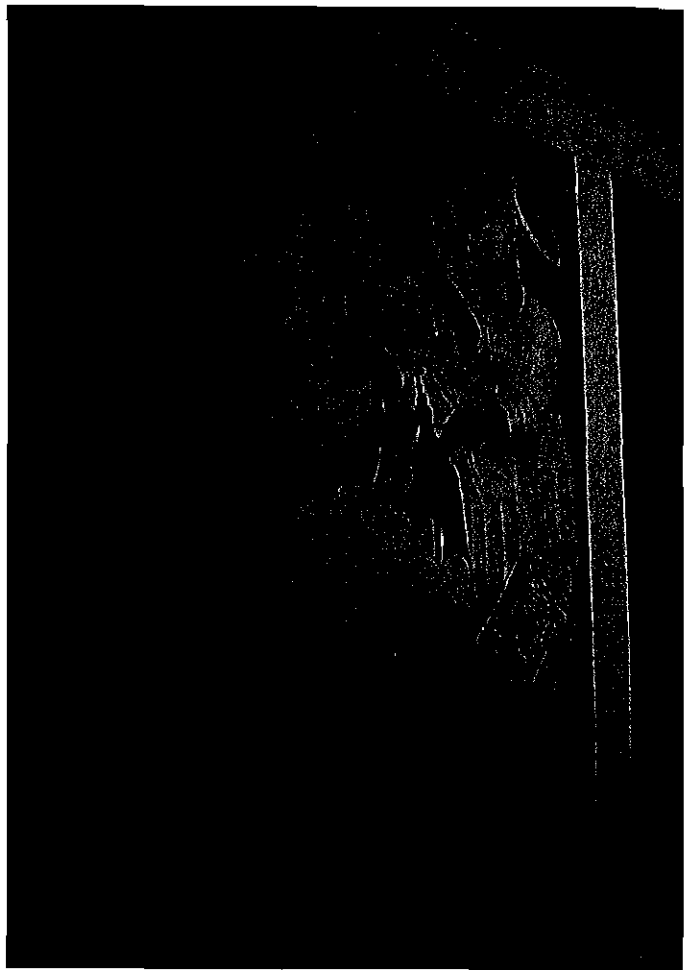
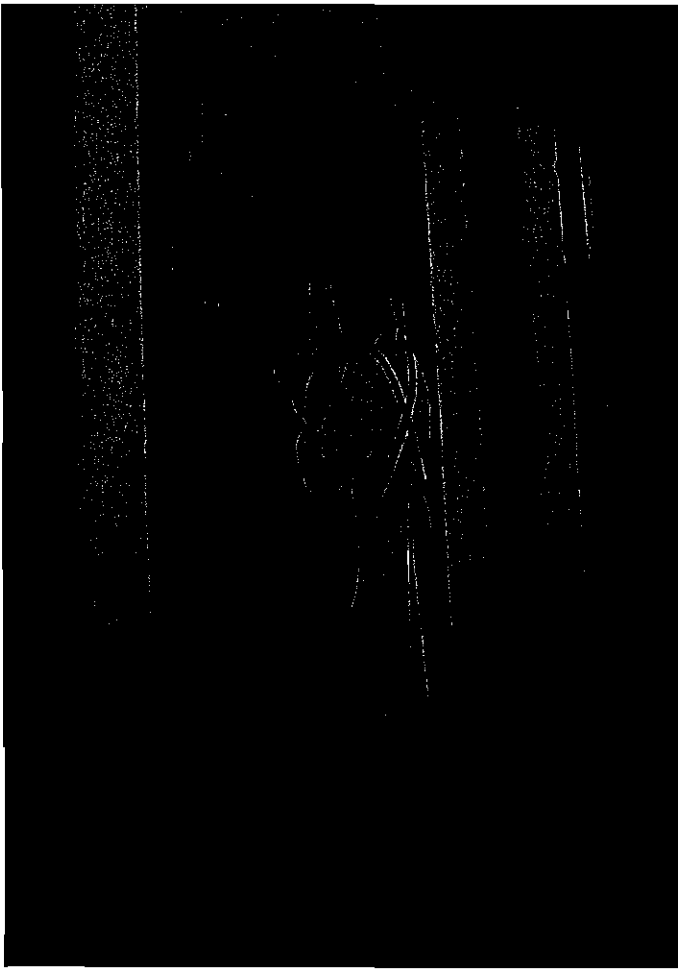
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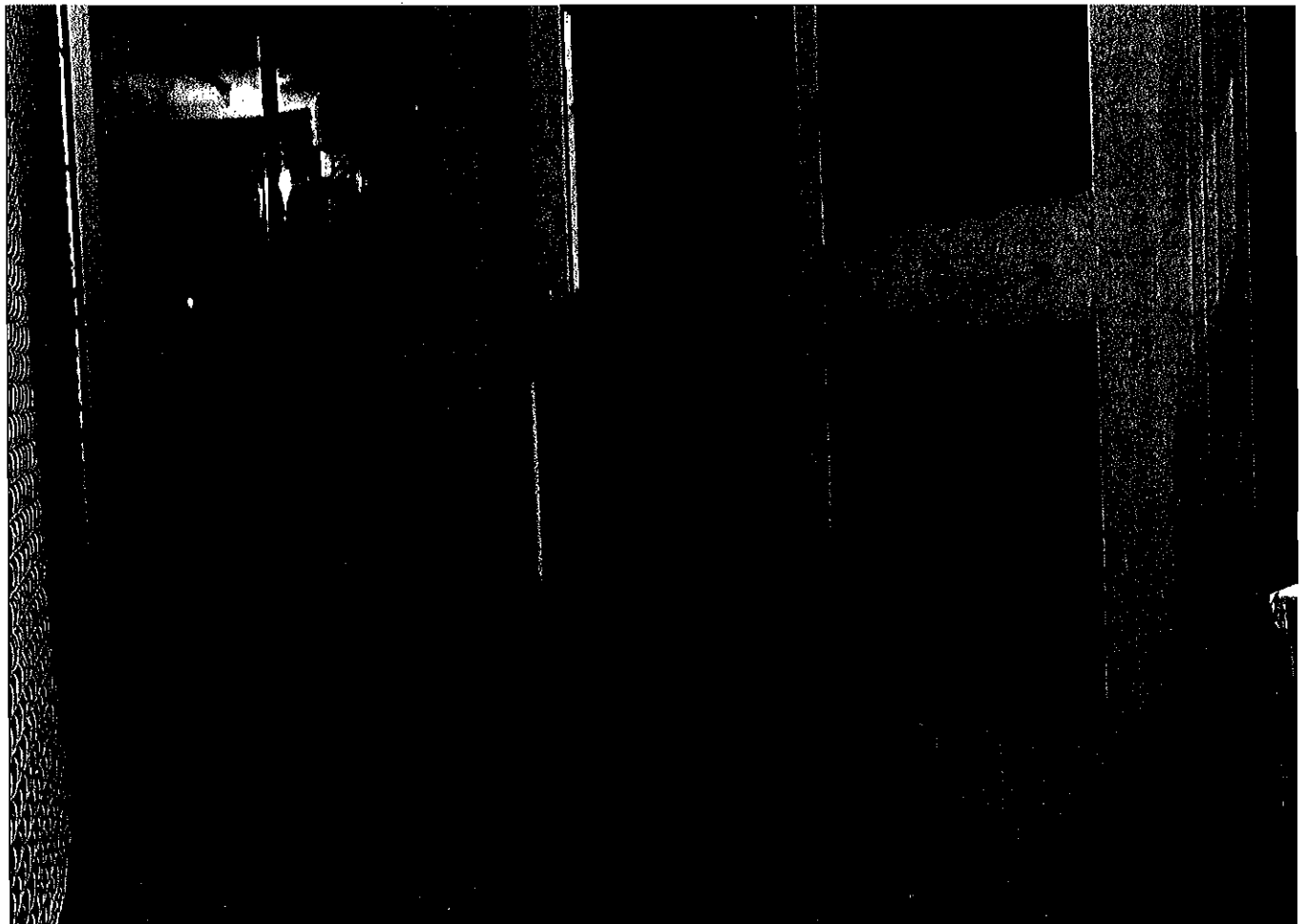
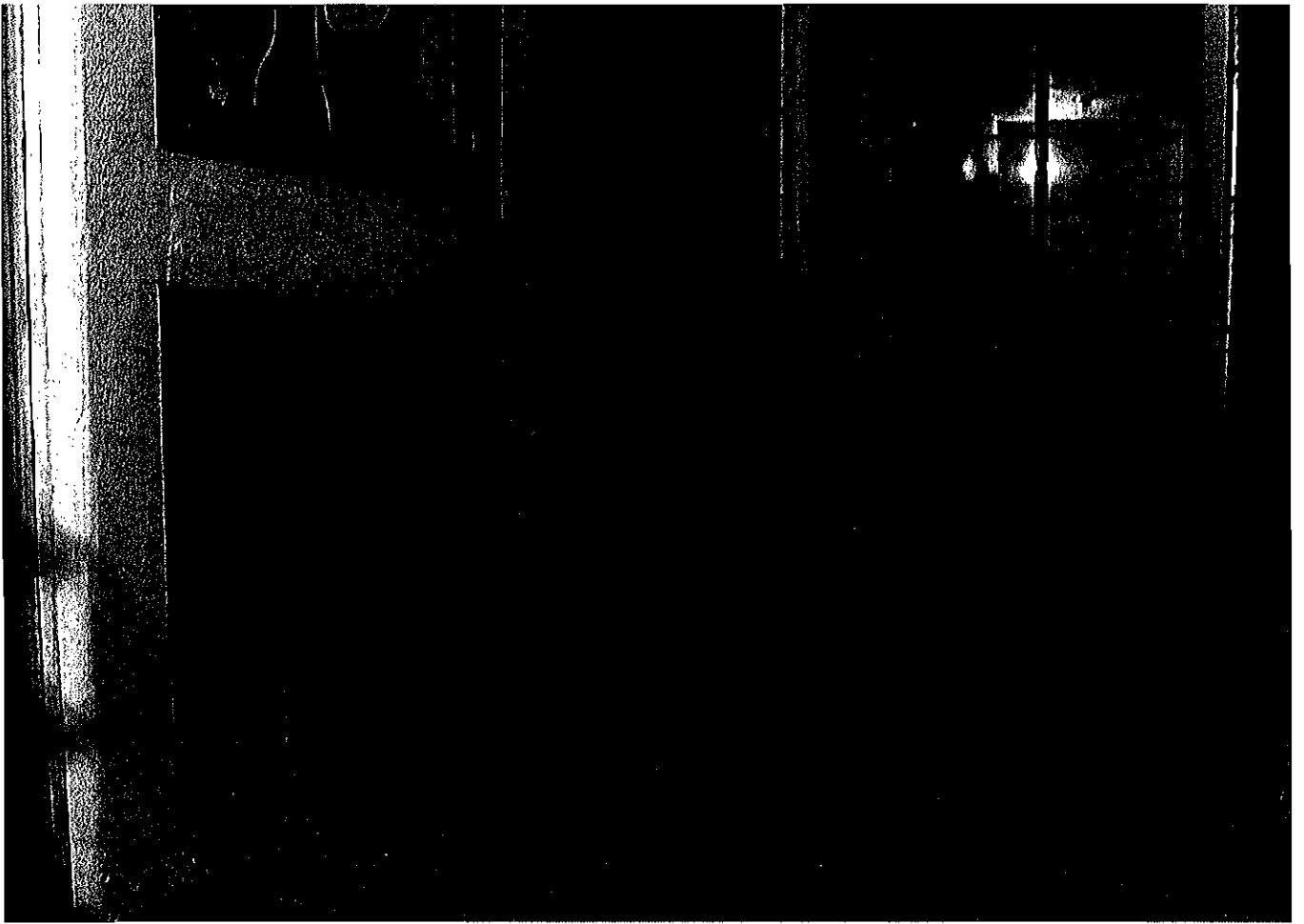
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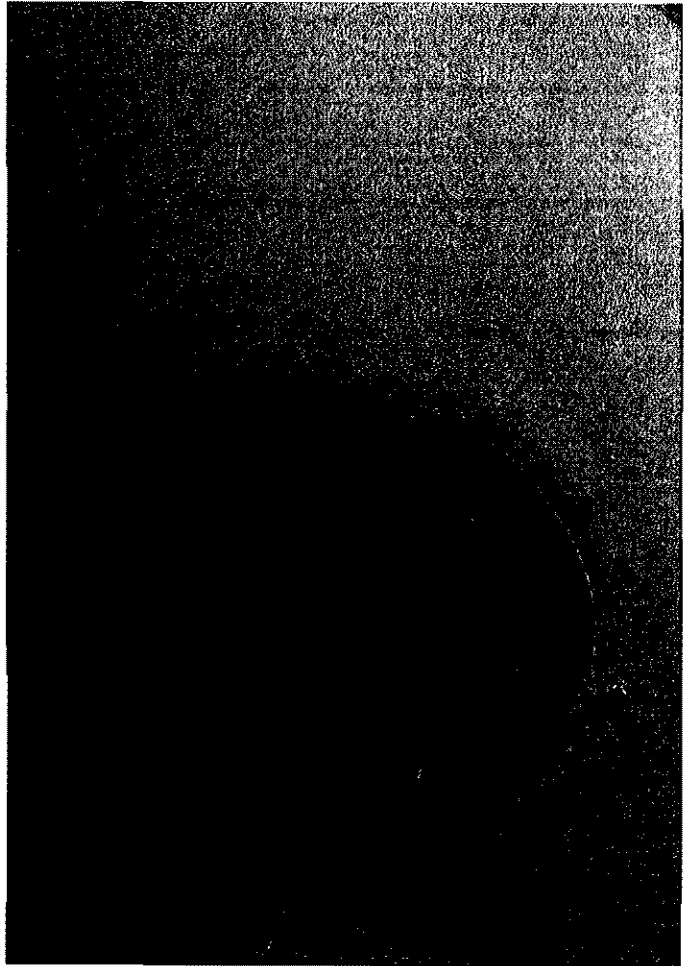
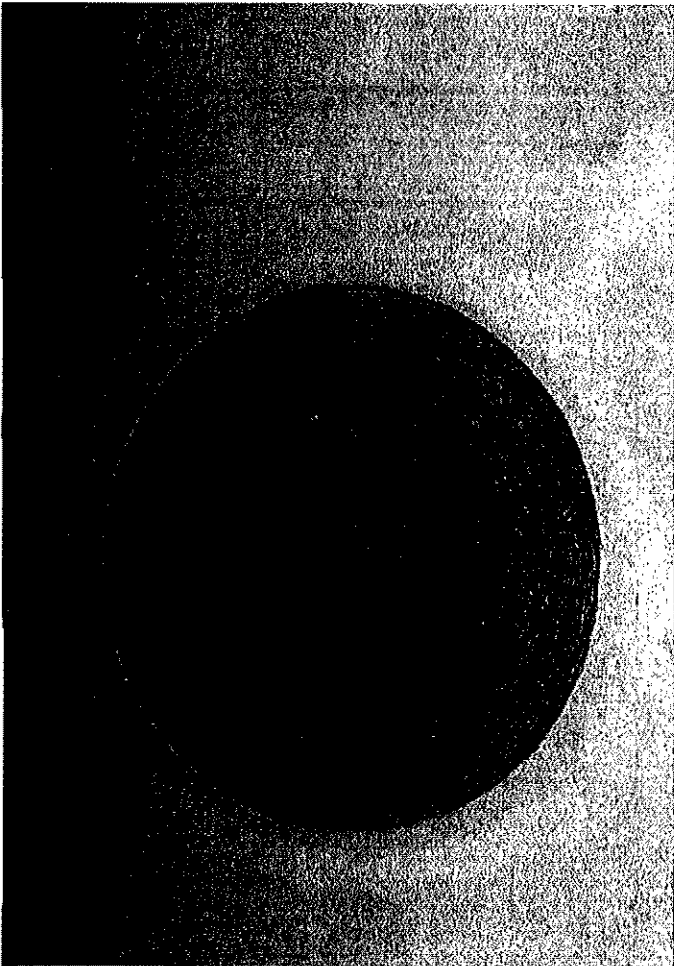
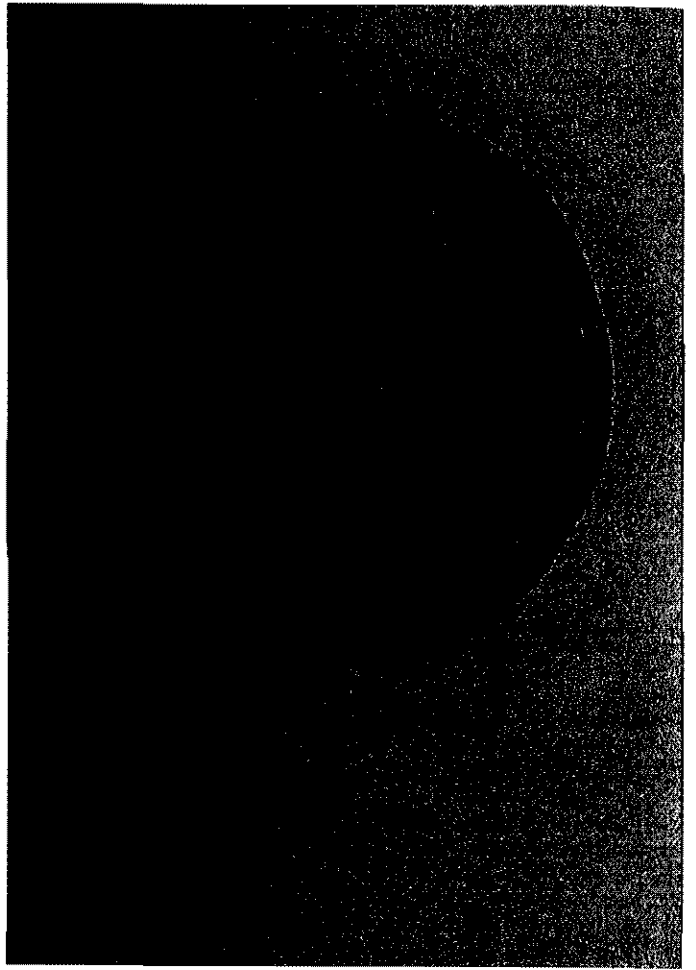
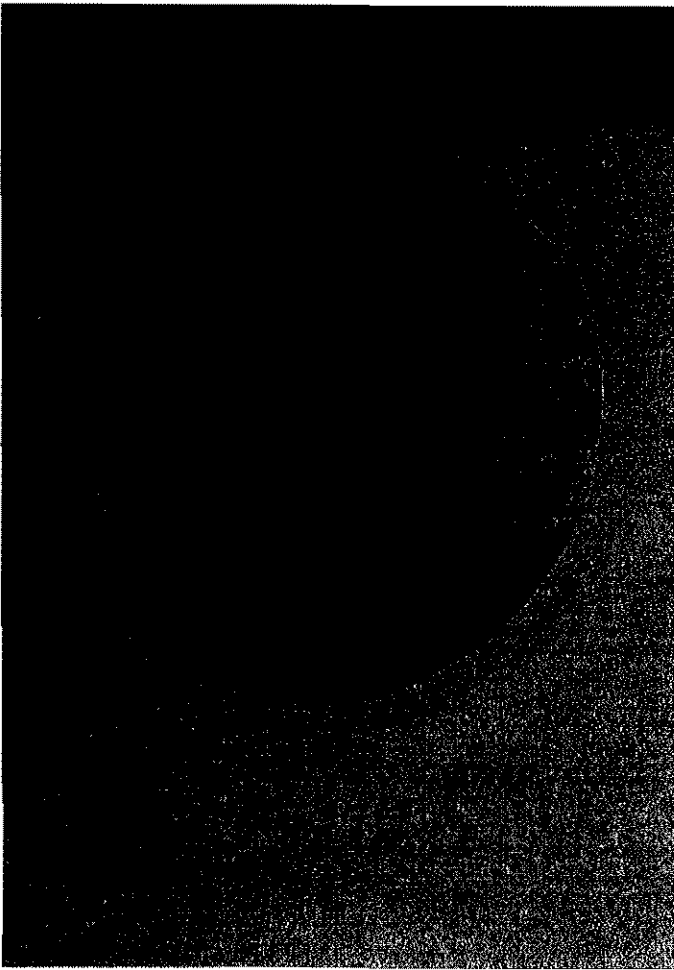
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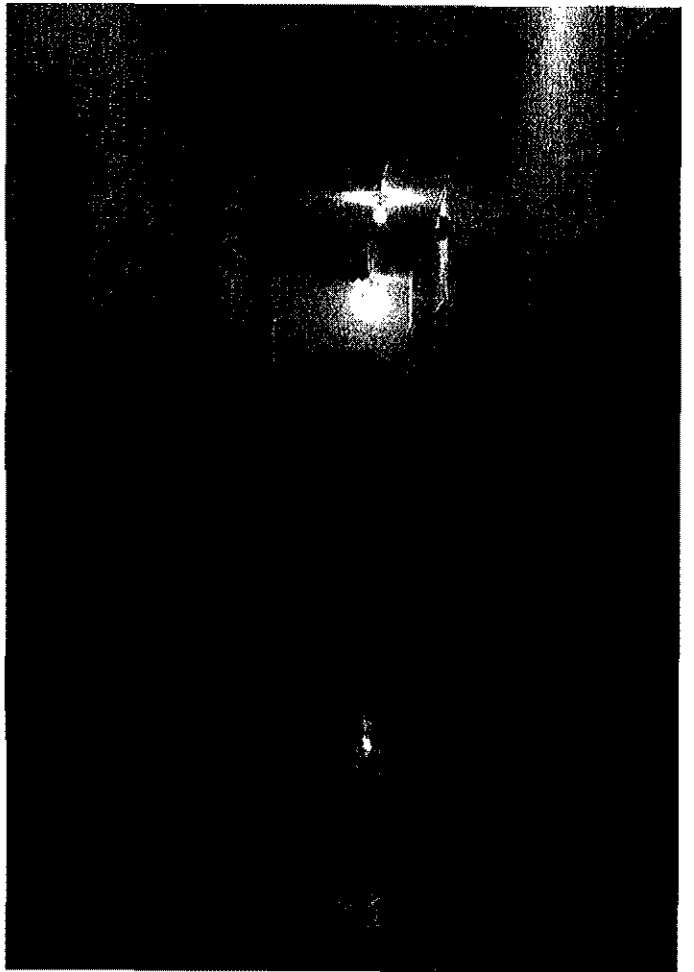
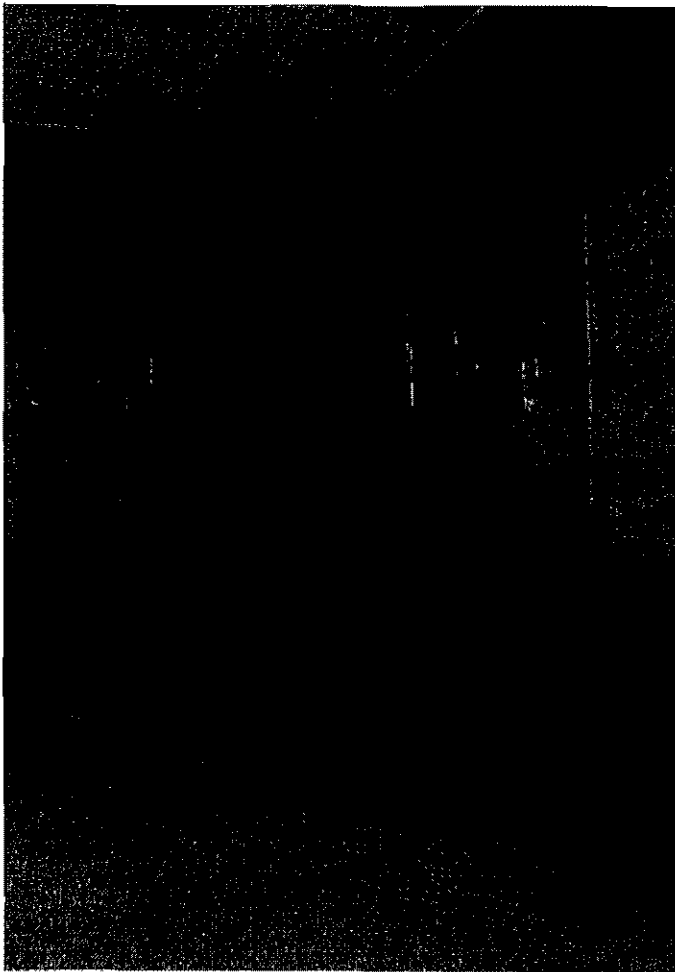
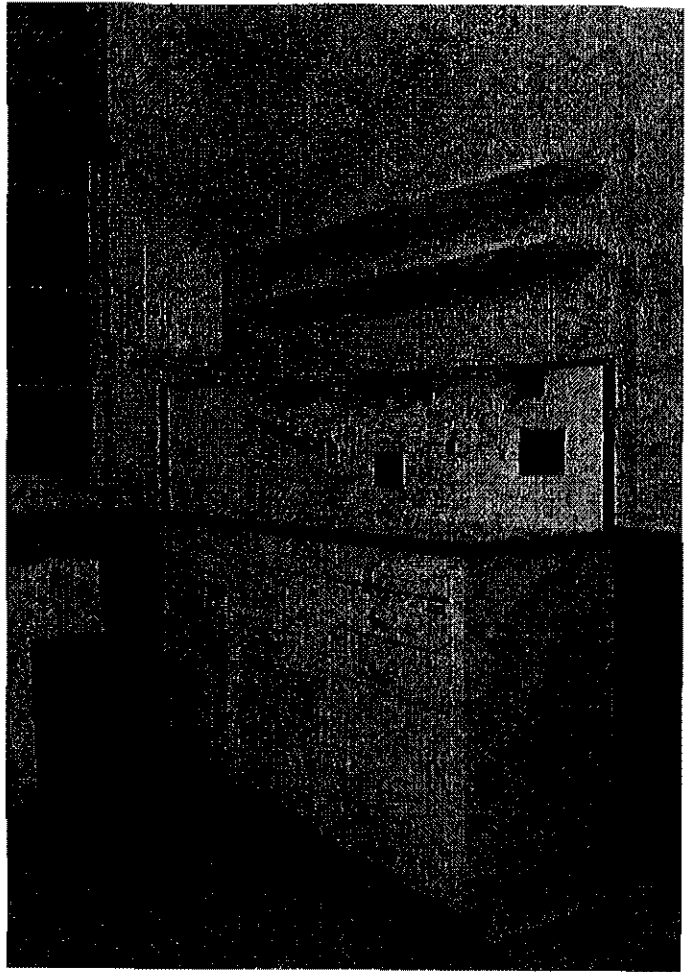
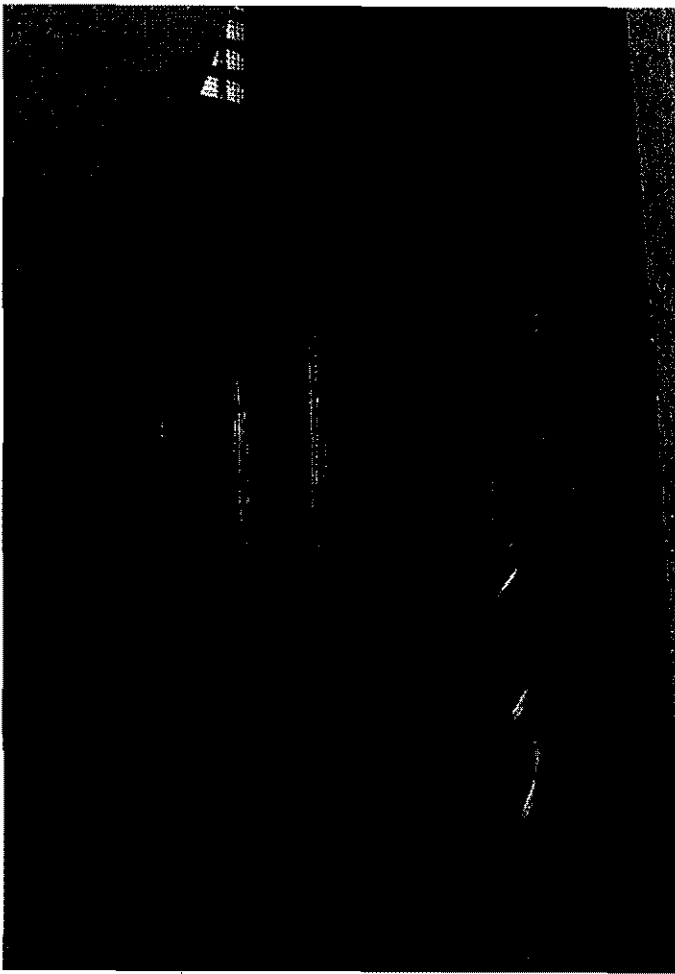
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April 13, 2010

Milford Wayne Donaldson
State Historic Preservation Officer
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

RE: Palo Alto Medical Clinic, Roth Building, 300 Homer Avenue, Palo Alto, CA
National Register of Historic Places Nomination

Dear Mr. Donaldson,

The Palo Alto City Council, acting in the capacity of a Certified Local Government and the property owner, finds the above nominated property meets the following criteria for listing on the National Register of Historic Places as established by the National Historic Preservation Act of 1966, as amended, and recommends approval to the State Historical Resources Commission:

- 1) The property known as the Roth Building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto by establishing the first multi-specialty group medical practice in the community in 1932 that became a model within the healthcare industry nationwide. The organization's long-term commitment to innovative community healthcare and research laid the foundation for the progressive healthcare network that thrives in Palo Alto today, and
- 2) The building known as the Roth Building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect, Birge Clark, and artist, Victor Arnautoff, and as a resource displaying high artistic value. Constructed in the Spanish Eclectic style, the concrete structure with a terra cotta roof remains for the most part intact since it was constructed in 1932. Exterior frescoes created by Victor Arnautoff depicting contrasts between modern medical practices of the era and primitive medical practices are of high artistic value to the community.

Sincerely,

Patrick Burt
Mayor



Historic Resources Board

Staff Report

Date: March 3, 2010

To: Historic Resources Board

From: Kathy Marx, Planner

Department: Planning and Community Environment

Subject: **300 Homer Avenue (Roth Building):** Request by the Department of Planning and Community Environment on behalf of the City of Palo Alto, for Historic Resources Board review and recommendation to the City Council authorizing staff to send a letter of support to the State Historical Resources Commission for the nomination of the Category 2 Roth Building to the National Register of Historic Places. (Public Facilities (PF) with a SOFA I Cap)

RECOMMENDATION

Staff recommends that the Historic Resources Board (HRB) recommend to the City Council support for the nomination of the Category 2 Roth Building to the National Register of Historic Places and authorize staff to send a letter of support to the State Historical Resources Commission.

BACKGROUND

On December 17, 2009, staff received a letter from Milford Wayne Donaldson, State Historic Preservation Officer, requesting review of the nomination of the Category 2 Roth Building to the National Register of Historic Places. The applicant for the nomination is the Palo Alto History Museum (Museum). The application was prepared for the Museum by Sarah Hahn and Becky Urbano, architectural historians for Garavaglia Architecture, Inc. The City is identified as the property owner and a Certified Local Government (CLG) under the National Historic Preservation Act of 1966. Upon review for completeness and compliance with National Register eligibility criteria by the Office of Historic Preservation (OHP) the nomination is scheduled for hearing by the State Historical Resources Commission (Commission) on April 30, 2010. (Please see Attachment B- Correspondence and Attachment C- National Register Nomination)

OHP requests that the HRB also review the nomination for compliance with National Register eligibility criteria. If the HRB is opposed to the nomination, a recommendation would be made to City Council requesting a notarized letter of objection to be mailed to OHP prior to the scheduled hearing date. If the HRB is in support of the nomination, a recommendation would be made to City Council requesting a letter of support be mailed to OHP fifteen days prior to the scheduled

hearing date. (Please See Attachment E – Draft letter of support to OHP.)

PROJECT DESCRIPTION

The building at 300 Homer Avenue was constructed in 1932 as a healthcare clinic, the first group medical practice in Palo Alto. The architect for the building was Birge Clark. The builder for the project was Wells P. Goodnough. The period of significance for the building, 1932 – 1999, represents the period of the building's use by the Palo Alto Medical Clinic, spanning from the construction date of the original clinic to the year the clinic was vacated. The building was altered in 1947 with the addition of two wings in a U-shaped configuration to the south/rear façade. In 2003 the 1947 wings were demolished but character defining materials including roof tile, gutters and wood trim elements were salvaged. As well, the 1947 spine of the addition including the central circulation corridor was retained. That portion of the building was seismically retrofitted and left unfinished pending a new use for the building.

DISCUSSION:

The area of significance applicable to National Register criterion for the proposed Roth Building nomination is:

Criterion A) The property is associated with events that have made a significant contribution to the broad patterns of our history; and

Criterion C) The property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

The following statement of significance summary paragraphs from the nomination provides applicable criterion for level of significance necessary to be eligible to the National Register:

“The Palo Alto Medical Clinic building at 300 Homer Avenue in Palo Alto, California was the home of the first multi-specialty group practice in the community, founded in 1932. The Palo Alto Medical Clinic was a leader in advancing Palo Alto's health care resources and from the beginning, introduced new ideas and medical technology to the practice of medicine both in Palo Alto and to the Bay Area. The clinic's founders pioneered a model of group practice in the community that, though at first controversial, would later become common within the healthcare community nationwide. The clinic was one of the first in the region to offer a specialist in obstetrics and the first to offer a specialist in pediatrics. One of Palo Alto's first female physicians was also a founding member of the practice. Known today as the Roth Building, the building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto. The organization's long-term commitment to innovative community healthcare and research laid the foundations for the progressive healthcare network that thrives in Palo Alto today.

Founded by Palo Alto's beloved Dr. Russell Lee, the Palo Alto medical Clinic group

practice built its first clinic building in 1932. The new building, designed by architect Birge Clark, was constructed in the Spanish Eclectic style, the architectural style for which he is best known. A unique feature of the building is the series of fresco painting, completed by noted Depression-era muralist Victor Arnautoff, that decorate the wall face around the front entry. They are the only known exterior frescoes visible to the public in Palo Alto. Many of the building's original decorative and functional features are still extant and some, especially the frescoes themselves, are of high artistic value to the community. Interior features unique to the function of the building as a medical clinic are also still intact including the physicians' offices, examination rooms, and accompanying original finishes as well as the "in use" lights above the examination room doors along each corridor of the original clinic. As such, the building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect and artist and a resource displaying high artistic value."

Please see Attachment A for HRB Findings. To assist the HRB in review of the proposed nominations the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" is attached as Attachment C.

PUBLIC COMMENTS

Staff has not received written comments related to this project.

ENVIRONMENTAL REVIEW

The project is categorically exempt from California Environmental Quality Act (CEQA) review per Section 15331. Zone District: Public Facilities (PF) with a SOFA I cap.

ATTACHMENTS

Attachment A: HRB findings
Attachment B: National Register Nomination
Attachment C: National Register Bulletin
Attachment D: Correspondence
Attachment E: Draft letter of support for the nomination
Attachment F: Site location map

Prepared By: Kathy Marx, Planner
Manager Review: Steven Turner, Manager of Advance Planning

COURTESY COPIES

Michael Garavaglia, Garavaglia Architecture, Inc.
Steve Staiger, Palo Alto History Museum
Karen Holman, Palo Alto History Museum

ATTACHMENT A
FINDINGS FOR APPROVAL
HISTORIC RESOURCES BOARD STANDARDS FOR REVIEW
300 Homer Avenue

The Palo Alto Historic Resources Board has found the proposed National Register of Historic Places nomination of the building located at 300 Homer, locally known as the Roth Building, compliant with the evaluation criterion established by The National Historic Preservation Act of 1966, as amended.

1) The property known as the Roth Building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto by establishing the first multi-specialty group medical practice in the community in 1932 that became a model within the healthcare industry nationwide. The organization's long-term commitment to innovative community healthcare and research laid the foundation for the progressive healthcare network that thrives in Palo Alto today; and

2) The building known as the Roth Building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect, Birge Clark, and artist, Victor Arnautoff, and as a resource displaying high artistic value. Constructed in the Spanish Eclectic style, the concrete structure with a terra cotta roof remains for the most part intact since constructed in 1932. Exterior frescoes created by Victor Arnautoff depicting contrasts between modern medical practices of the era and primitive medical practices are of high artistic value to the community.

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. **Place additional certification comments, entries, and narrative items on continuation sheets (NPS Form 10-900a).**

1. Name of Property

Historic name Palo Alto Medical Clinic

Other names/site number Roth Building

2. Location

street & number 300 Homer Avenue

not for publication

city of town Palo Alto

vicinity

State California

code CA

county Santa Clara

code 085

zip code 94301

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___ national ___ statewide ___ local

Signature of certifying official/

Date

Title

State or Federal agency and bureau

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of certifying official

Date

Title

State or Federal agency and bureau

4. National Park Service Certification

I, hereby, certify that this property is:

Signature of the Keeper

Date of Action

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:)

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5. Classification

Ownership of Property
(Check as many boxes as apply)

<input type="checkbox"/>	private
<input checked="" type="checkbox"/>	public - Local
<input type="checkbox"/>	public - State
<input type="checkbox"/>	public - Federal
<input type="checkbox"/>	private

Category of Property
(Check only one box)

<input checked="" type="checkbox"/>	building(s)
<input type="checkbox"/>	district
<input type="checkbox"/>	site
<input type="checkbox"/>	structure
<input type="checkbox"/>	building(s)
<input type="checkbox"/>	object

Number of Resources within Property
(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
1		buildings
		sites
		structures
		Objects
		buildings
1		Total

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing)

Number of contributing resources previously listed in the National Register

N/A

6. Function or Use

Historic Functions
(Enter categories from instructions)

HEALTH CARE/CLINIC

Current Functions
(Enter categories from instructions)

VACANT/NOT IN USE

7. Description

Architectural Classification
(Enter categories from instructions)

Late 19th and 20th Century Revival

Others: Spanish Colonial Revival/Monterey Style

Influence

Materials
(Enter categories from instructions)

foundation: Concrete

walls: Concrete

roof: Terra-Cotta

other: (see continuation sheet)

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Narrative Description

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

Summary Paragraph

300 Homer Avenue is a one- and two-story, Spanish Eclectic style, U-shaped concrete building clad in beige cement stucco and topped by a clay Mission tile roof. The building sits on a corner lot, at the edge of Heritage Park, bounded by Homer Avenue and Bryant Street. It is oriented northwest, facing Homer Avenue with a playground to the northeast, an open grassy space to the southeast and residential development facing it on the surrounding blocks. The neighborhood is a mixture of new infill, multi-family housing and traditional turn-of-the-century residences. Limited ground-floor commercial enterprises are located along Bryant Street. The subject building wraps around a landscaped courtyard that is centered on a large oak tree. The central spine of 300 Homer Avenue runs parallel with Homer Avenue and is two-stories with a hipped, tile-clad roof. A three-story elevator shaft and stairwell punctuates the roof plane at the central rear of the building. Opposite the elevator shaft and stairwell, facing the courtyard, is a second floor rusticated wood balcony, reminiscent of the Monterey style. Below the balcony, also facing the courtyard is an arched arcade, which protects the primary entry to the building. Perpendicular to the spine are two, one-story wings with front-facing gables and tile-clad roofs. The building predominantly has five-lite steel casement window modules, arranged in large, roughly square assemblies of various sizes. Most windows are currently covered by plywood on the exterior surface of the building. The interior is a mix of office and unfinished spaces arranged around a central, U-shaped circulation corridor. The offices traditionally functioned as doctors' offices and examination rooms with some limited storage in the basement. The finishes and configuration of the one-story wing interiors closely resemble their original forms and appearance, while more liberal modifications to the two-story spine have been made to accommodate modern waiting rooms and office administration. Overall, the building is in good conditions with many original features and finishes.

Narrative Description

300 Homer Avenue has a restrained design that was typical for its architect, Birge Clark. The simplicity of the exterior finishes is contrasted with large features, such as the wood balcony overlooking the courtyard and smaller decorative features such as green scalloped wood eave molding, circular roof vents filled with overlapping Mission tiles and large window openings facing mature trees and landscaping in the examination and office rooms. Each element is part of the overall composition and is harmonious with creating a soothing, peaceful environment for the clients of the Palo Alto Medical Clinic.

The primary elevation of 300 Homer is the most articulated. The main entrance is recessed from the street wall, at the far end of a small brick and landscaped courtyard. A three-bay arched arcade shelters a series of medically themed frescos painted by famed muralist and student of Diego Rivera, Victor Arnautoff. The four color frescos depict modern medical practices, including a pediatric examination, an internist using a stethoscope to examine a woman, surgery being performed with an Albee saw, and an early fluoroscope (x-ray machine). They are paired with smaller frescos illustrating like procedures used by "modern medicine's" predecessors. All are in excellent condition and have not been modified since their creation. (They remain the only public exterior fresco murals in Palo Alto). Wood double doors with five horizontal lights open into the clinic lobby. The original herringbone pattern brick floor of the loggia is intact on both sides, but the center section has been changed to cement for handicapped entry.

The original primary entrance to the building is centered on this wall, surrounded by frescos. On the exterior wall, centered above the arch columns, are four painted medallions depicting Lister, Hippocrates, Pasteur and Roentgen, also completed by Arnautoff. Above the arcade is a cantilevered wood balcony supported by rusticated beams (visible from below) with carved ends. Similar beams and decorative ends are used to support the roof above the balcony. The balcony runs the length of the central spine and is accessed through two pairs of multi-lite wood French doors. (A multi-lite steel window of the same dimensions has replaced a third pair of French doors). Eight square wood posts with simple wood brackets support the roof and a low railing and turned wood balustrade. The balustrade is composed of three styles of randomly mixed turned wooden balusters. The courtyard is bounded on the remaining two sides by the original one-story clinical wings. These elevations have a mirrored fenestration pattern of different modulations of the multi-lite steel window form found throughout the structure. Each window is recessed into the concrete wall with a simple slightly projecting concrete sill. These windows are currently covered with plywood. The one-story wings terminate their gable ends at the street wall. These facades are similar in composition, with a central door or window (originally a door but converted to a window by 1959), flanked by two larger windows and topped by a circular roof vent opening centered under the roof peak. (See Continuation Sheets)

8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing)

- A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations

(Mark "x" in all the boxes that apply)

Property is:

- A owned by a religious institution or used for religious purposes.
- B removed from its original location.
- C a birthplace or grave.
- D a cemetery.
- E a reconstructed building, object, or structure.
- F a commemorative property.
- G less than 50 years old or achieving significance within the past 50 years.

Areas of Significance

(Enter categories from instructions)

A - Development of healthcare in Palo Alto; first group medical practice in Palo Alto

C - Architecture/Design

Period of Significance

A 1932-1999

C 1932

Significant Dates

1932 - Date of Construction

1947 - U-shaped addition added at rear (wings now removed)

Significant Person

(Complete only if Criterion B is marked above)

Cultural Affiliation

Architect/Builder

Birge Clark, Architect

Wells P. Goodnough, Builder

Period of Significance (justification)

The period of significance encompasses the building's period of use by the Palo Alto Medical Clinic. It spans from construction of the original clinic building to the year the clinic vacated the property (1932-1999).

Criteria Considerations (explanation, if necessary) N/A

Statement of Significance Summary Paragraph (provide a summary paragraph that includes level of significance and applicable criteria)

The Palo Alto Medical Clinic building at 300 Homer Avenue in Palo Alto, California was the home of the first multi-specialty group practice in the community, founded in 1932. The Palo Alto Medical Clinic was a leader in advancing Palo Alto's health care resources and, from the beginning, introduced new ideas and medical technology to the practice of medicine both in Palo Alto and to the Bay Area. The clinic's founders pioneered a model of group practice in the community that, though at first controversial, would later become common within the healthcare community nationwide. The clinic was one of the first in the region to offer a specialist in obstetrics and the first to offer a specialist in pediatrics. One of Palo Alto's first female physicians was also a founding member of the practice. Known today as the Roth Building, the building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto. The organization's long-term commitment to innovative community healthcare and research laid the foundations for the progressive healthcare network that thrives in Palo Alto today.

Founded by Palo Alto's beloved Dr. Russell Lee, the Palo Alto Medical Clinic group practice built its first clinic building in 1932. The new building, designed by architect Birge Clark, was constructed in the Spanish Eclectic style, the architectural style for which he is best known. A unique feature of the building is the series of fresco paintings, completed by noted Depression-era muralist Victor Arnautoff, that decorate the wall face around the front entry. They are the only known exterior frescoes visible to the public in Palo Alto. Many of the building's original decorative and functional features are still extant and some, especially the frescoes themselves, are of high artistic value to the community. Interior features unique to the function of the building as a medical clinic are also still intact including the physicians' offices, examination rooms, and accompanying original finishes as well as the "in use" lights above the examination room doors along each corridor of the original clinic. As such, the building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect and artist and a resource displaying high artistic value.

Narrative Statement of Significance (provide at least one paragraph for each area of significance)

THE BEGINNINGS

Dr. Russel Lee, the founder of the Palo Alto Medical Clinic, was born in Spanish Fork, Utah in 1895 as one of eight children.¹ He came to California in 1913 to study chemical engineering at Stanford University and, to earn his living expenses, took a job washing glassware for Hans Zinsser, the first professor of bacteriology at Stanford. Inspired by the professor's work, the young student switched to pre-med and studied at Stanford for three years before he transferred to the University of California in 1913 when he got a job in the State Hygiene Laboratory in Berkeley.²

Lee completed his pre-med degree at Berkeley and moved back across the Bay to complete his medical degree at Stanford University Medical School, then located in San Francisco. In 1920, having earned his M.D. at Stanford, Dr. Lee entered into private practice with San Francisco internist Dr. Harold Hill. In 1924, Dr. Lee accepted an offer to go into partnership with Dr. Thomas Williams in Palo Alto. The doctors initially worked out of Dr. Williams' office building at the corner of Bryant Street and Hamilton Avenue in Palo Alto (601 Bryant).³ It was out of this early partnership that the seeds of the Palo Alto Medical Clinic began to grow.

From the beginning of this joint venture, the two doctors had a tremendous workload. In an attempt to stem the tide of incoming patients, Dr. Lee raised the price of care. He famously stated, "I didn't particularly enjoy obstetrical practice, so I upped my delivery fee from \$35 to \$100. This immediately quadrupled my practice. My patients said, 'If he charges that much, he must be pretty good.'" The practice quickly grew to a point where the two men could not handle it alone and their practice soon grew with the addition of surgeon-obstetrician Dr. E. B. (Fritz) Roth in 1925 and pediatrician Dr. Esther B. Clark in 1927. At the time that she joined, Dr. Clark was the only pediatrician between San Francisco and San Jose.⁴ Dr. Wilbur, a surgeon who had spent time training at the Mayo Clinic, was added to the practice in 1930.⁵ (See Continuation Sheets).

Developmental history/additional historic context information (if appropriate)

¹ *Palo Alto Medical Foundation House Report*, "Russ Lee - 'He Was the Person With Vision'," (Vol. 1, No. 1, 29 January 1982), 1.

² *Ibid.*, 3.

³ *Ibid.*, 3. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

⁴ R. Hewlett Lee, M.D., "Historical Notes on the Palo Alto Medical Clinic (Revised in part from notes of Russel V. Lee, M.D.)", (11 September 1989), 1-2.

⁵ *Palo Alto Times* (Palo Alto, CA), "Dr. Blake Wilbur dies; surgeon for 49 years," 11 March 1974. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets) See Continuation Sheets for list of references.

Previous documentation on file (NPS):

- preliminary determination of individual listing (36 CFR 67 has been requested)
- previously listed in the National Register
- previously determined eligible by the National Register
- designated a National Historic Landmark
- recorded by Historic American Buildings Survey # _____
- recorded by Historic American Engineering Record # _____

Primary location of additional data:

- State Historic Preservation Office
 - Other State agency
 - Federal agency
 - Local government
 - University
 - Other
- Name of repository: **Palo Alto Historical Association archives**

Historic Resources Survey Number (if assigned): Antonio Aguilar of the NPS determined that the property "appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the SHPO according to the procedures set forth in 36 CFR Part 60 (12.06.2007, Project # 21121).

10. Geographical Data

Acreeage of Property Less than an acre.
(do not include previously listed resource acreage)

UTM References

(Place additional UTM references on a continuation sheet)

1	<u>10</u>	<u>574680</u>	<u>4144250</u>	3	<u> </u>	<u> </u>	<u> </u>
	Zone	Easting	Northing		Zone	Easting	Northing
2	<u> </u>	<u> </u>	<u> </u>	4	<u> </u>	<u> </u>	<u> </u>
	Zone	Easting	Northing		Zone	Easting	Northing

Verbal Boundary Description (describe the boundaries of the property)

The Palo Alto Medical Clinic (Roth) Building is located at 300 Homer Avenue in the City of Palo Alto, County of Santa Clara, State of California, on: A portion of Lot 1 in Block 24 as shown upon that certain map entitled "University Park," which was filed for record in the office of the Recorder of the County of Santa Clara on February 27, 1889, in Book D of Maps, page 69, more particularly described as follows:

Beginning at the intersection of the northeasterly line of Bryant Street, 60 feet wide, with the southeasterly line of Homer Avenue, 60 feet wide; thence along said Southeasterly line of Homer Avenue, North 39 degrees, 20 minutes, 51 seconds East 140.00 feet; thence parallel with the Northeasterly line of Bryant Street, South 50 degrees 40 minutes 04 seconds East 125.00 feet; Thence parallel with the Southeasterly line of Homer Avenue, South 50 degrees 20 minutes 51 seconds West 140 feet to the Northeasterly line of Bryant Street; thence along said Northeasterly line, North 50 degrees 40 minutes 04 seconds west 125.00 feet to the Point of Beginning.

The portion of Lot 1, Block 24 that is occupied by the subject property is referred to as Parcel B. Said parcel contains 17,500 square feet more or less. The Santa Clara County Assessors Property Number for the subject property is APN 120-17-093 (a portion).

Boundary Justification (explain why the boundaries were selected)

The building is located within a large parcel of land formerly owned and developed by the Palo Alto Medical Clinic. The boundary includes property now owned by the City of Palo Alto and under long-term lease to the Palo Alto History Museum. The boundaries of the lot currently occupied by subject property encompass the building and the site immediately surrounding the building envelope.

11. Form Prepared By

name/title Palo Alto History Museum assisted by Sarah Hahn and Becky Urbano, Architectural Historians
organization Garavaglia Architecture, Inc. date 11/17/2009
street & number 1 Sutter Street, Suite 910 telephone (415) 391-9633
city or town San Francisco state CA zip code 94104
e-mail sarah@garavaglia.com

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A **USGS map** (7.5 or 15 minute series) indicating the property's location.
A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Continuation Sheets**
- **Additional items:** (Check with the SHPO or FPO for any additional items)

Photographs:

Submit clear and descriptive black and white photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger.

Name of Property: Palo Alto Medical Clinic

City or Vicinity: Palo Alto

County: Santa Clara

State: CA

Photographer: George Koerner (all original digital image files held by photographer)

Date Photographed: Various, see matrix.

Description of Photograph(s) and number:

Photo Number	Photo Date	Photo Description
0001	14 March 2009	Northwest (front) elevation; camera facing southeast.
0002	20 November 2009	Northwest (front) elevation, showing front gable ends; camera facing south.
0003	20 November 2009	Northeast (side) elevation; camera facing southeast.
0004	14 March 2009	Southeast (rear) elevation; camera facing north.
0005	20 November 2009	Southwest (side) elevation; camera facing east.
0006	20 November 2009	Setting; camera facing northeast.
0007	9 Nov 2009	West corridor; camera facing northwest toward front of building.
0008	9 Nov 2009	Room 114, Office overview; camera facing west.
0009	9 Nov 2009	Room 138, Examination room; camera facing west.
0010	9 Nov 2009	Rear stairwell; camera facing southeast.
0011	9 Nov 2009	Mural: Pediatric Examination; camera facing northeast
0012	9 Nov 2009	Mural: Women's Health Examination; camera facing northeast

0013	9 Nov 2009	Mural: Albee Saw; camera facing southwest
0014	9 Nov 2009	Mural: Fluoroscope examination; camera facing southwest
0015	9 Nov 2009	B&W Murals – Right of entrance; camera facing southwest
0016	9 Nov 2009	B&W Murals – Left of entrance; camera facing northeast
0017	14 March 2009	Medallion: Lister; camera facing southeast
0018	14 March 2009	Medallion: Hippocrates; camera facing southeast
0019	14 March 2009	Medallion: Pasteur; camera facing southeast
0020	14 March 2009	Medallion: Roentgen; camera facing southeast
0021	14 March 2009	Courtyard detail; camera facing southeast

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 16 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, PO Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

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DESCRIPTION (continued)

The northeast elevation of 300 Homer Avenue is largely devoid of the decorative detailing found within the central courtyard. The stucco wall plane is broken by large window openings (all covered with plywood) and the same slightly projecting sills found in the courtyard. At the rear of this elevation, along the two-story spine, the wall is solid with no window or door openings.

The southeast elevation (rear) of the building has a more modern stucco finish as the result of the recent removal of two later additions to the building. These wings connected to the building along the central spine. They were removed, and the surface was finished with a modern interpretation of the original stucco finish and scored to approximately indicate the former floor levels of the removed building sections. The remaining windows on this elevation are associated with the central circulation stair and elevator core and are a mixture of two arrangements of steel casements similar to the rest of the building and two arrangements of glass block.

The final elevation is the southwest elevation facing Bryant Street. This street façade is quite different from the formal Homer Avenue entry. The Bryant Street side of the building was used for supply deliveries and other functional, non-public activities. Toward the rear, as part of the two-story spine, a projecting one-story gable roof extends to the street wall. It is access by a small entry porch with a single wood column, with wood brackets at the porch roof. It is similar, although simpler in composition, to the courtyard balcony. The remainder of the elevation is marked by a series of multi-lite steel casement windows arranged similarly to those on the northeast elevation. This section marks the street-facing wall of the southern one-story wing.

Detailed Description - Interior

The interior of 300 Homer continues to exemplify the building's history as a medical clinic. Its first floor areas are arranged in a series of small examination rooms and office spaces that are both interconnected and accessed by a central hallway. Many of these rooms still retain their original finishes while others have been modified, but traces of the original materials remain. Generally, the building is divided into three types of spaces – doctors' offices, administrative spaces and patient care areas.

Today, the primary entrance through the courtyard opens into a small foyer flanked by two smaller rooms and facing a series of very small rooms used for storage or as restrooms. Beyond this entry point, a modern reception desk and waiting room has been created by combining a series of the original laboratory and examination rooms at the rear of the building. Originally, the front doors opened to a large foyer and reception area with a black and rust colored clay tile floor. Beyond the reception area are the 1947 terrazzo Streamline Moderne stairs. They begin in the basement and rise to the second floor. The balusters are matte finish aluminum with a graceful walnut handrail bending at each landing. Slightly less ornate stairs continue on to the top of the elevator tower where the original machinery and switch panels remain in place. These stairs are lighted by the use of glass brick windows and original lighting fixtures. The adjacent Otis elevator was operable when the clinic moved out in 1999. Original center-opening doors remain on each floor. The elevator car has wood paneling with horizontal aluminum bands and rounded Moderne corners. Beyond the modern waiting room areas, an open, unfinished space marks the location of the central two-story spine. This area was formerly connected to two 1947 rear wings and to an adjacent building via a short hallway. These later additions and features were removed in 2003 and the space was left unfinished.

Off the open unfinished central spine, two perpendicular hallways provide access to the one-story wings. Each of these wings is dedicated to doctors' offices and examination rooms of various types. Many of the original offices retain their Flexwood wall paneling, decorative radiator plates, Art Nouveau door and window hardware and built in cabinetry. These highly refined rooms are generally arranged to face one another across the central hallway. They are spread out throughout the one-story wings. Between the offices are small examination rooms. The original black and white tile backsplashes, hexagonal tile counters, black porcelain soap dishes and glass shelf brackets and sinks remain in several of the examination rooms. The rest

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have been replaced in whole or in part with c.1960s equivalents. Each of these rooms originally had a door that opened to a small hallway with access to a shared water closet. Generally two rooms shared a single water closet. Original restrooms are finished with green floor tile. Today, most of the restrooms have their original tile but the fixtures have been replaced. Where examination rooms have been combined, the restrooms have been removed or allocated to access to a single examination room. All of the restrooms in the two single-story wings retain all or a significant portion of their original finishes.

The second floor consists of another open unfinished space along the central spine with a suite of offices and examination rooms toward the front of the buildings. These rooms were finished after original construction, but before the rear additions were added. As such, they exhibit slightly later finishes, but these finishes are original to the spaces. They consist largely of bleached wood paneled walls in the rooms and painted white wallboard in the hallways and restrooms. The entire suite is carpeted and shares a single waiting room that opens onto the balcony. Some walls have been relocated since original construction but the suite, in general, remains in its original configuration.

Beyond the functional features of each room, the interior retains a good representation of period fixtures and lighting. On the first floor, small semi-circular globes are placed above each doorway of the original examination rooms. While no longer functional, they were used to indicate whether the patient had been seen or not, or if they needed assistance. A corresponding switch was placed in each room to activate the light. On the second floor, light fixtures consisting of concentric rings of white metal are found in the office suite. They appear to date to the original finishing of the spaces in 1937. Drawer pulls, solid wood doors, doorknobs and plates, window hardware and switch plates remain, providing an authentic aesthetic to the entire space.

Alterations

300 Homer Avenue was originally constructed in 1932 as a medical clinic. At that time the building was a U-plan design with a two story, hip-roof spine and two one-story gable roof wings. The first floor housed the medical clinic and the smaller second floor contained an unfinished office suite. This suite was completed in 1937 to accommodate additional doctors' offices and examination rooms.

In 1947, the building was greatly expanded by the construction of a U-plan addition that connected at the rear of the building. Designed by the original architect, Birge Clark, this new construction was a full two-stories in height and consisted of a new two-story spine and two, two-story wings. The spine contained a new circulation core consisting of a Moderne-style Otis elevator and three-story terrazzo, metal and oak stair. The rest of the work was executed in mostly mass-produced materials and had greatly simplified interior finishes and detailing. The resulting structure had an H-plan and housed a number of additional medical services including expanded x-ray and surgery capabilities.

Additional room was needed as the clinic continued to expand. In 1961, a new building was constructed just east of 300 Homer Avenue on the site of the current playground. Known as the Lee Building, it was larger in size than 300 Homer Avenue. An opening was cut into the east wall of the 1947 spine to accommodate a hallway to connect the two buildings. At this time, the courtyard entry ceased to be the primary patient entry point. The lobby was converted into a nurses' station and this is the configuration that remains today.

The Palo Alto Medical Foundation (formerly the Palo Alto Medical Clinic) operated the facility until 1999 when they sold the property to the City of Palo Alto. In 2000, the Lee Building was demolished and the hallway opening in the east wall of 300 Homer Avenue was filled in.

In 2003, the 1947 wings at the rear of the building were also removed. Key character-defining features of these wings were salvaged (roof tile, gutters, wood trim elements) and the 1947 spine, including the central circulation corridor was retained. This portion of the building was seismically retrofitted and left unfinished pending a new use for the building.

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Of an unknown date are the alterations that transformed the original X-ray and surgery rooms in the 1932 west wing into the examination room, office and support spaces that are currently in place. The date of conversion of the east waiting room into examination rooms and support spaces is also unknown. However, many of the existing walls and finishes appear to be original even if their former configurations have been modified.

The building's current form is approximately that of the original 1932 construction. It contains all portions from the original construction plus the form and volume of the 1947 spine. Representative rooms, displaying the original 1932 finishes and uses remain to provide a clear image of the patients' experiences and the doctors' work environments in the early years of this highly influential medical institution. The overall appearance, both inside and out, is that of an early mid-20th century medical clinic, uniquely designed to fit within the architectural traditions of Palo Alto.

CONCLUSION

300 Homer Avenue was constructed in 1932 to house the newly formed Palo Alto Medical Clinic. It has served as a medical building for this organization until its sale to the City of Palo Alto in 2000. The exterior design of the building is in keeping with the predominant architectural style executed in Palo Alto in the early part of the 20th century and the interior is specifically designed to create an efficient medical clinic operation. The decorative features throughout the building are of a high quality and design that is atypical for modern medical facilities and give 300 Homer Avenue an overall welcoming character that exemplified the Clinic's mission and dedication to the surrounding community of Palo Alto. It retains its integrity despite years of continued use as a medical facility and recent alterations to later additions to the property. While currently unoccupied, it has been stabilized and protected for future use and is subject to regular inspections and maintenance.

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NARRATIVE STATEMENT OF SIGNIFICANCE (continued)

The continued rapid growth of the practice soon necessitated the addition of more physicians. As such, Dr. Milton Saier, an internist and allergy specialist joined the practice in 1931, and Dr. Niebel, a family practitioner and specialist in anesthesiology, joined c.1932. Dr. Williams, the elder of the group, retired in 1929.⁶ In the first years of the 1930s, the evolving group practice was still operating out the crowded 601 Bryant Street location and plans were beginning to form for a new partnership and a new facility.

THE FOUNDING MEMBERS⁷

In 1932, six Palo Alto physicians formally agreed to join their practices in a new and innovative type of medical partnership in Palo Alto. The partnership agreement, just three pages long, offers little indication of how unusual their decision was at a time when many doctors viewed group practice as something close to communism.⁸ Nor does it foretell how the fledgling Palo Alto Clinic, founded in a small college town several miles south of San Francisco, would become one of the largest and most well-respected physician groups in the United States.⁹ In addition to Dr. Russel Lee, the founding members are as follows:

Dr. Edward Frederick (Fritz) Roth

Known interchangeably as "Fritz" or "Butch" by those who knew him; Dr. Roth was born in Ukiah, CA and educated at Stanford University and Stanford University Medical School, graduating from the latter in 1920. Roth later went to Boston where he received additional training in general surgery and obstetrics/gynecology. He joined Dr. Russell Lee in practice in 1925 initially handled most of the group's work in that specialty. Later, when more doctors joined the clinic, he turned to his first love, orthopedics and sports medicine. Dr. Roth was noted for his outstanding work as an orthopedist and became team physician for Stanford University in the 1930s, a position in which he continued throughout his career. Roth was a founding member of the group practice and the original clinic building at 300 Homer Avenue, the Roth Building, is named for him.

Dr. Esther Clark

Dr. Esther Bridgeman Clark, sister of famed Palo Alto Architect Birge Clark, was one of the first female doctors in Palo Alto and the first pediatrician in the Palo Alto area. Clark was born in 1900 and attended Stanford University and later Stanford University Medical School (then located in San Francisco), receiving her M.D. in 1925. She began her pediatric practice in Palo Alto after graduation and joined the Palo Alto Clinic as a partner in 1927. She joined the clinical faculty of Stanford Medical School in the 1930s and in 1953 established the Children's Health Council. Dr. Clark retired in 1972 at age 72.¹⁰

⁶ R. Hewlett Lee, M.D., "Historical Notes" (11 September 1989), 2.

⁷ Various accounts exist about the formation and development of the Palo Alto Clinic and its founding members. Some list only four founding members (Lee, Roth, Clark and Wilbur), and some as many as nine. According to the "Historical Notes," written by Dr. R. Hewlett Lee (Dr. Russel Lee's son), the group formally established itself as the Palo Alto Clinic in 1929. A 1953 *Palo Alto Times* article indicates that Palo Alto Clinic Ltd. incorporated in 1932. An August 1932 *Palo Alto Times* article entitled "Medical Staff In New Building" identifies the physicians present at the time the building at 300 Homer Avenue was originally occupied as the following: Lee, Roth, Clark, Wilbur, Saier and Niebel. These six physicians are also recognized as the founding members by the Palo Alto Medical Foundation (website) and in the publication entitled *Palo Alto Medical Clinic: the First 75 Years* by Sara Katz O'Hara. A reproduction of another formal partnership agreement, dated 1 October 1936, is shown in the latter publication on page 20 (same six doctors).

⁸ *Palo Alto Times* (Palo Alto, CA), "Redistribution of Stock Started by P.A. Clinic," 25 July 1953. Another early partnership agreement was made in 1936, see: Sarah Katz O'Hara, *Palo Alto Medical Clinic, the First 75 years*. Dr. Francis A. Marzoni, Editor, (Palo Alto Medical Foundation, Palo Alto, CA: n.d.), 20.

⁹ The Palo Alto Clinic added the word "Medical" to its title in 1955 when a law passed by the California Legislature required it.

¹⁰ *Palo Alto Times* (Palo Alto, CA), "Esther Clark," 27 March 1972. Also Online Archive of California (<http://oac.cdlib.org>), Guide to the Esther Bridgeman Clark Papers (accessed 22 October 2009).

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Dr. Blake C. Wilbur

Born in San Francisco, Dr. Blake Wilbur, son of Stanford University president Ray Lyman Wilbur, attended Stanford and Harvard medical schools, graduating from Harvard in 1925. He trained at the Mayo Clinic in Rochester, Minnesota and practiced briefly in San Francisco before returning to Palo Alto in 1930. Dr. Wilbur joined the Palo Alto Medical Clinic that same year and became renowned for his work as a surgeon. For many years, he was a clinical professor of surgery at Stanford University Medical School and he practiced surgery up to the time of his death in 1974.¹¹

Dr. Milton H. Saier

Dr. Milton Saier joined the Palo Alto Clinic group practice in 1931, when the group was still operating out of an overcrowded office in a two-story house at 601 Bryant Street. Born in Fresno, California in 1902, he earned a biochemistry degree at Stanford University in 1924 and a medical degree from Stanford Medical School in 1928. Dr. Saier practiced internal medicine and specialized in allergies. When he joined the clinic, he was the only allergist between San Francisco and San Jose, and he created the first allergy department at the clinic. Dr. Saier retired in 1968.¹²

Dr. Herbert Lee Niebel

An Ohio native, Dr. Herbert Niebel graduated from Stanford University with a degree in civil engineering in 1914, and following graduation served for a period as an assistant instructor in bacteriology at Stanford. The latter experience led to an interest in clean air and water as well as a decision to enter Stanford Medical School where he received his M.D. degree in 1923. Dr. Niebel entered into private practice in Palo Alto for a time before joining the Palo Alto Medical Clinic as a general practitioner skilled in anesthesiology. He remained with the clinic until his retirement in 1956.¹³

THE EARLY YEARS

As common as it might seem today, group medical practices were relatively uncommon in 1932, when Dr. Lee and the five partners incorporated as Palo Alto Clinic Ltd.¹⁴ Group medical practices had existed in the United States from the late 1800s, when the Mayo Clinic was founded in Rochester, Minnesota. As Mayo-trained physicians spread throughout the country, some set up their own group practices. By 1932, there were approximately 125 group practices in the country, with nearly a third of them located in the Midwest.¹⁵

As medicine in the United States had traditionally been practiced on an individualized, fee-for-service basis, the early group practices that did exist were seen by many independent physicians as forms of corporate or "socialized" medicine that threatened their professional autonomy.¹⁶ At one point, a resolution was introduced in the Santa Clara County Medical Society barring any Palo Alto Medical Clinic physician from membership. This was a reaction both to the clinic's growing presence in the community, and to a 1946 agreement to provide pre-paid medical care to Stanford University students – an

¹¹ *Palo Alto Times* (Palo Alto, CA), "Dr. Blake Wilbur dies; surgeon for 49 years," 11 March 1974; *Palo Alto Times* (Palo Alto, CA), "Blake Wilbur's feted on Anniversary," 25 June 1973; *Palo Alto Times* (Palo Alto, CA), "Scholarship for Surgeons established," 13 September 1972. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

¹² *Palo Alto Daily News* (Palo Alto, CA), "D. Milton Saier, Founding Partner of Palo Alto Clinic," 1 June 1996; San Francisco Chronicle (San Francisco, CA), "Dr. Milton H. Saier," n.d.

¹³ *Palo Alto Times* (Palo Alto, CA), "Dr. Herbert Lee Niebel," 26 February 1979. Also see the Palo Alto Medical Foundation website, "The Founding Physicians," accessed 22 October 2009.

¹⁴ *Palo Alto Times* (Palo Alto, CA), "Redistribution of Stock Started By Palo Alto Clinic," 7/25/1953.

¹⁵ "A Brief History of Group Practice." Palo Alto Medical Foundation, 2001 (accessed 17 November 2009).

<http://www.pamf.org/about/pamfhistory/grouppractice.html>.

¹⁶ "The 1930s: Medicine And Health: Overview." *American Decades*. The Gale Group, Inc. 2001. *Encyclopedia.com*

<http://www.encyclopedia.com/doc/1G2-3468301278.html> (accessed 17 November 2009). Also, "The Bonds of Brotherhood, Teamwork and the Group Practice." Mayo Foundation for Medical Education and Research. "http://www.mayoclinic.org/tradition-heritage/group-practice.html (accessed 17 November 2009).

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uncommon arrangement at the time and one that many independent practitioners saw as unfairly exclusive.¹⁷ The group practice, however, became increasingly more common in the following decades and by 1969, it is estimated there were just over 6,000 group medical practices in the United States; in 1999 there were approximately 20,000.¹⁸

To accommodate the new Palo Alto Clinic's expanding operations, Palo Alto architect Birge Clark was contracted in 1931 to draw up plans for a new office and clinic building.¹⁹ The new location was designed to accommodate twelve doctors, thereby allowing for future growth. Notice of a building permit issued for the clinic was printed on the front page of the February 10, 1932 issue of *The Palo Alto Times*.²⁰ The building at 300 Homer Avenue, which was at the outer edge of Palo Alto's commercial district at the time, opened later that year.²¹ An article in the *Palo Alto Times* on August 4, 1932, described the new clinic as "a complete, self-contained unit, providing not only doctors' suites, but an X-ray department, an operating room, clinical laboratory, together with bookkeeping office and other facilities."²²

The Palo Alto Clinic was the first group medical practice in Palo Alto, and one of the earlier group practices in California.²³ Not only was the clinic a different type of medical practice than was common in those days, it was also innovative in its application of that practice. Whereas the Mayo Clinic and most other clinics of the time operated on a "referral" system, with patients referred by outside physicians for "secondary" care by a clinic's specialists, the Palo Alto Clinic's primary care physicians referred patients to specialists within the clinic if the need arose, thus providing both primary and secondary care in a single setting.²⁴

The structure and operation of the organization itself was unique as well. The clinic was organized as a partnership and in the early years each partner was assigned whatever percent of income the individual deemed appropriate for his or her services. Dr. Lee's philosophy was, "Give a guy what he wants and then make him earn it."²⁵ A separate corporation was also established by the group, in which each partner held stock, owned the real estate, the medical equipment and office furniture. Governing decisions were made as a group, with each physician's vote carrying equal weight.²⁶

Prior to Palo Alto Clinic's opening in 1932, Palo Altans' local health care options had consisted primarily of individual physicians and a one hundred-bed hospital, which was built in 1929, owned by the City of Palo Alto, and operated by Stanford Medical School. The opening of the Clinic widened the scope of medical care available in Palo Alto by having specialists, a rare feature at the time, within the Clinic's practice. Further, the group practice setting made it possible for primary doctors and specialists to easily interact with one another within the clinic when making a diagnosis of a patient.²⁷ It also allowed for new technology to be made available as it was developed, something that was often too expensive for individual doctors to afford.

¹⁷ "A Brief History of Group Practice." Palo Alto Medical Foundation, 2001 (accessed 17 November 2009).
<http://www.pamf.org/about/pamfhistory/grouppractice.html>.

¹⁸ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

¹⁹ Architectural Plans, *Office Building for Doctors Lee, Roth, Clark and Wilbur*, by Birge Clark, 19 December 1931.

²⁰ *Palo Alto Times* (Palo Alto, CA), "Three Building Permits Issued, Total \$93,400," 2/10/1932.

²¹ *Palo Alto Times* (Palo Alto, CA), "Medical Staff In New Building," 8/4/1932.

²² *Ibid.*

²³ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

²⁴ *Ibid.* Also: *Palo Alto Times* (Palo Alto, CA), Medical Insert Section, "Facility Seeks Complete Community Care," 9/15/1959.

²⁵ *Palo Alto Weekly* (Palo Alto, CA), "PA Medical Clinic Marks 30th Year," 3/13/1980.

²⁶ Sarah Katz O'Hara, *The First 75 Years*, 13.

²⁷ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

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Palo Alto, like the rest of the nation in the 1930s, felt the burden of the Great Depression. Clinic physicians often waived their fees - \$3.00 for an office visit, \$4.00 per daytime house call, and \$10.00 per nighttime house call - since many patients could not afford to pay. Some patients brought in food from their gardens to offer as compensation. After the war however, many patients returned to pay off old debts.²⁸

POST WAR BOOM

Until 1946, the Palo Alto Clinic grew at a measured pace, adding doctors as they were needed. However, the large increase in the Peninsula's population following World War II created an urgent need for more doctors and the office space to accommodate them. In 1946 alone, 12 doctors joined the staff.²⁹ The increased demand was met by the 1947 opening of a U-shaped addition, designed by the firm of (Birge) Clark and Stromquist, which attached to the rear of the 1932 building.³⁰ The rear addition tripled the clinic's capacity and was constructed for an estimated \$450,000.³¹

The clinic continued to grow, increasing the variety of specialists and services offered. A 1953 *Palo Alto Times* article noted that the Palo Alto Clinic had 1,000 patients a day filing through its doors, only one-fifth of that number coming from Palo Alto. The same article states that by 1953, the clinic had 58 doctors and new patients were being added at a rate of 1,200 per month.³²

By 1961, Palo Alto Medical Clinic (as it became in 1955 to conform to a law requiring that "medical" be added to its name) had undergone further expansion into a new building on the property, adjacent to the original Roth building.³³ The new building was named the Lee building in honor of Dr. Russel V. Lee, and the original building at 300 Homer Avenue became known as the Roth building after Dr. "Fritz" Roth.³⁴ Both buildings provided medical offices and treatment rooms for clinic doctors.

The Palo Alto Medical Clinic and the Palo Alto Medical Research Foundation were combined in 1981 to form the not-for-profit Palo Alto Medical Foundation (PAMF); the Palo Alto Medical Clinic continued to exist as a "separate for-profit corporation under the Foundation umbrella".³⁵ In 1993, the Foundation became an affiliate of Sutter Health. Today the Palo Alto Medical Foundation is one of the largest multispecialty group practices in California.³⁶

ACHIEVEMENTS

From its inception, innovation and commitment to community health care were tenets of the Clinic's philosophy. In 1946, the Palo Alto Clinic became one of the earliest medical groups to work with managed care insurance plans when it contracted with Stanford University to care for students under a prepaid medical plan. This was the first time in its history that Stanford had offered a comprehensive health service to its students.³⁷

²⁸ Palo Alto Medical Foundation website, "Depression, War and a Population Explosion," <http://pamf.org> (accessed 1 October 2008).

²⁹ Ward Winslow and others, *Palo Alto: A Centennial History*, (Palo Alto: Palo Alto Historical Association, 1st edition), 174.

³⁰ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³¹ *Palo Alto Times* (Palo Alto, CA) "Work to begin on \$450,000 Clinic Addition," 25 July 1946.

³² *Palo Alto Times* (Palo Alto, CA) "P.A. Clinic major medical center," 30 July 1953. Also, *San Francisco Examiner* (San Francisco, CA), "Palo Alto Clinic Treats 1000 A Day," 7/26/1953.

³³ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³⁴ Conversation between Dr. Robert Roth and Beth Bunnenberg, Palo Alto, CA, June 2004.

³⁵ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

³⁶ Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

³⁷ *Palo Alto Times* (Palo Alto, CA) "Stanford now offers students full prepaid health program," 9 April 1946.

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Known initially as prepaid health care, managed care first manifested in Southern California when the Los Angeles Department of Water and Power contracted with a local clinic to provide medical care for its workers at the rate of \$2.69 per month. Shortly thereafter, industrial baron Henry J. Kaiser made similar arrangements for workers at the Grand Coulee Dam and in his shipyards and steel mills.³⁸ Though a handful of similar plans were set up following those models, prepaid health plans did not become common until the 1970's, when the Nixon Administration announced its plan (in 1971) to fund the development of prepaid health maintenance organizations or HMOs.³⁹

The agreement between Stanford and the clinic was that the clinic would provide medical care for all university students for an advance fee of \$5.00 per semester, taken out of tuition. This was the first prepaid medical care plan on the Peninsula and it initially caused a stir with the Santa Clara County Medical Society, prompting unsuccessful efforts to remove the clinic doctors from the membership organization. A similar prepaid plan was developed by the Clinic in the 1950's for Stanford faculty and staff.⁴⁰

In 1950, the Clinic became one of the first facilities in the country to offer radiation therapy for cancer patients in an outpatient setting. In the same year the Clinic founded the Palo Alto Research Foundation, a separate legal entity, located in a separate building.⁴¹ Originally conceived to provide Palo Alto Clinic doctors with the opportunity to engage in medical research, it instead developed into a facility for scientists doing basic research; research that has produced a number of medical advances.⁴² Clinic doctor Esther Clark established the Children's Health Council, as a separate entity, to care for disabled children in 1953.⁴³ Dr. Lee had long fostered an interest in care for the aged and in 1964, founded the retirement community Channing House, providing lifetime medical care by Palo Alto Medical Clinic's doctors. Both the Children's Health Council and Channing House were established with the help of the Palo Alto Clinic founded not-for-profit Medical Research Foundation.⁴⁴

Dr. Russel V. Lee had long supported pre-paid health care and was a national advocate for the development of group practice. In 1951, he was appointed to President Truman's Commission on Health Needs of the Nation, which proposed a plan that later became a basis for Medicare.⁴⁵

The Clinic also "served as a model for other nascent medical groups. Indeed, Dr. Lee claimed that the first partnership agreement of the Permanente system - 'was worked out in my living room right after the war'.⁴⁶ The desire to bring innovative medical approaches and new technology to the community was an original goal of the Palo Alto Medical Clinic that still continues today. Examples are: the first mammography machine on the West Coast purchased in 1965, the pioneering in the early 1970's of outpatient surgery to reduce hospital stays, and, also in the 1970's, the establishment of one of the first stand alone Sports Medicine Departments in the United States.⁴⁷ This department was rooted in the work and interest of one of the Clinic's founders, Dr. "Fritz" Roth.⁴⁸

³⁸ Palo Alto Medical Foundation website, "Early Experiments With Managed Care," <http://pamf.org> (accessed: 10.23.2009).

³⁹ Ibid.

⁴⁰ Palo Alto Medical Foundation website, "Early Experiments With Managed Care," <http://pamf.org> (accessed: 10.23.2009).

⁴¹ Ibid.

⁴² Palo Alto Medical Foundation, *A History of Innovation: the Story of the Palo Alto Medical Foundation*, 1987.

⁴³ Ward Winslow and the Palo Alto Historical Association, *Palo Alto: A Centennial History* (Palo Alto: Palo Alto Historical Association, 1993), 179.

⁴⁴ Sarah Katz O'Hara (Dr. Francis Marzoni, Ed.), *Palo Alto Medical Clinic: The First 75 Years 1930-2005*, (Palo Alto: Palo Alto Medical Foundation).

⁴⁵ Article: "Dr. Russel V. Lee: A Radical or Simply Ahead of His Time," no date. Palo Alto Historical Association files.

⁴⁶ Ibid.

⁴⁷ "Timeline: 1930-2005." Palo Alto Medical Foundation (website). <http://www.pamf.org/about/pamfhistory/timeline.html> (accessed 17 November 2009).

⁴⁸ *Palo Alto Times* (Palo Alto, CA), "Letter from Russell V. Lee, Dr. Roth Linked Two Medical Eras," 4/6/1972.

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Over the years, the Palo Alto Medical Foundation had expanded into various neighboring buildings. A decision was made to consolidate these facilities, and in September 1999, most of the facilities had been moved to a new building and campus in Palo Alto, approximately five blocks from its original home. The obsolete property of the Medical Foundation was sold, including the Roth building, which the City of Palo Alto purchased in 2000.

The Palo Alto Medical Clinic's group medical practice was a forerunner in the evolution of Palo Alto as a progressive medical center. In 1959, in conjunction with the construction of a new hospital owned jointly by Palo Alto and Stanford University, Stanford moved the campus of its medical school in San Francisco to Stanford's main campus in Palo Alto. The Stanford Lane Hospital was also moved from San Francisco and to the new Palo Alto/Stanford Hospital at that time. The Palo Alto Medical Clinic's long-standing and mutually beneficial relationship with Stanford University and its medical school played a significant role in facilitating this move.

In the late 1960s, Stanford University bought out the City of Palo Alto's interest in the above-mentioned hospital and subsequently embarked on an extensive medical expansion program that has continued into the 2000's. A number of other medical facilities were subsequently developed. Among them were the Veteran Affairs Hospital, which opened on Stanford land adjoining Palo Alto's border in 1960, the Peninsula Children's Center (1960), and the Community Association for the Retarded (1963). Interplast, Inc., providing free reconstructive surgery in third world countries, was founded in Palo Alto in the late 1960's.⁴⁹ Today the Palo Alto Medical Foundation, Stanford University Medical complex, and groups of individual physicians, form Palo Alto's health industry - an industry which attracts regional, and to some degree, national and international patients.

PALO ALTO MEDICAL CLINIC BUILDING

The Palo Alto Medical Clinic building is an excellent example of the Spanish Eclectic style of architecture and retains many interesting decorative and functional features from its original conception. Birge Clark, an architect of major local importance, designed the building in 1931-32 in the architectural style for which he is best known. Victor Arnautoff, a depression era artist of note in the Bay Area, painted the frescos at the entryway. They are the only known exterior frescoes visible to the public in Palo Alto.

Birge Clark

Birge Clark (1893-1989) was a significant Palo Alto architect whose work had a major impact on the City of Palo Alto. Paula Boghosian, an architectural historian, in 1979 wrote in *Historical and Architectural Resources of the City of Palo Alto* that Birge Clark's "Spanish Colonial Revival designs are largely responsible for the coherent Spanish Colonial Revival image of much of Palo Alto and for the consistency between the downtown commercial area and the Spanish Colonial Revival residential neighborhoods of the town."⁵⁰

A lifelong resident of Palo Alto, Clark earned an undergraduate degree from Stanford University, graduating in 1914 with a major in art and a minor in engineering. He earned his master's degree in architecture from Columbia University. Birge Clark used many architectural styles for his commercial and residential buildings but is best known for the Spanish Eclectic style, or what he called California Colonial.⁵¹ His three National Register listed buildings and all of his buildings in the National Register-listed Ramona Street Architectural District were designed in this style.⁵² It is also in this same style that the Roth building was designed at the height of Birge Clark's Spanish Eclectic period.

⁴⁹ Ward Winslow and the Palo Alto Historical Association, *Palo Alto: A Centennial History* (Palo Alto: Palo Alto Historical Association, 1993).

⁵⁰ Paula Boghosian, Architectural Historian, *Historical and Architectural Resources of the City of Palo Alto* (1979), 13.

⁵¹ *San Francisco Chronicle* (San Francisco, CA), "Peninsula Architect Birge Clark, 96," 3 May 1989.

⁵² The listed National Register properties designed by Birge Clark are the Norris House, Dunker House and the U.S. Post Office building in Palo Alto.

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According to Birge Clark's memoirs, at the time they began planning the new clinic building in 1931, clinic physician Russell Lee was in favor of using the Art Moderne style of architecture. Though the architect made a number of sketches for a Moderne building, he advocated for a design in the California Colonial style that he felt more comfortable with. As stated in his memoirs, he felt that, "the 'moderne' was still in its infancy at best and would probably change a good deal as time went on, while the California Colonial was a developed, mature style with its tile roofs, thick walls, wrought iron, balconies [and] arches."⁵³ After much debate, the doctors settled on the "California Colonial" or Spanish Eclectic style promoted by Birge Clark and the building was completed in 1932.

Birge Clark, and his architecture firm Clark & Stromquist, was employed by the Palo Alto Medical Clinic to design numerous projects over the years including a small office building at 321 Channing and the two-story rear addition to the Clinic building in 1946. They also finished the interiors on the second floor of the original clinic building in 1937. The last large addition, added in 1969, was completed in a more modern style than the first portions of the building, as it was intended to be the first three stories of a nine-story high rise.⁵⁴

As is evident today, the building combined a commercial use with a predominately residential-type exterior design. Employing two single-story wings enclosing a courtyard with a mature oak tree, and using residential scale doors and windows, and French doors opening onto a gallery on the front elevation of the recessed second story, Birge Clark enabled the Roth building to blend into its residential surroundings. Additionally, the familiar architectural style made the building comfortable and inviting to patients who had, up to that point in time, largely been treated by medical practitioners working out of their own homes.

Victor Arnautoff

In 1931, Dr. Russell V. Lee commissioned Russian artist Victor Arnautoff (1896 – 1979) to paint the fresco murals around the front entry to the new Clinic building. Alfred Frankenstein, *San Francisco Chronicle's* long-time art critic, described Arnautoff in 1955 as "one of the best mural painters in the United States".⁵⁵ Arnautoff was born in Russia in 1896 and emigrated to Mexico in the early 20th Century where he studied mural painting and became an assistant to Diego Rivera in the late 1920s. In 1931, he came to San Francisco and worked with Rivera on the mural commissioned for the San Francisco Art Institute.⁵⁶ Arnautoff also studied art at the California School of Fine Arts in San Francisco.

His first solo commission in California was for the Palo Alto Clinic, which was completed in 1932.⁵⁷ In 1933-34 Arnautoff was chosen by the Works Progress Administration as one of the artists for the murals at Coit Tower in San Francisco. Some of his other murals include the large fresco in the Main Post Chapel in the Presidio (1935) as well as frescoes in high schools and other buildings in the Bay Area. Arnautoff taught art at Stanford University from 1939 until his retirement in 1963 after which he returned to Russia, where he lived out his life.⁵⁸

The Roth building's frescoes have a medical theme contrasting modern medicine with earlier medical methods. There are four fresco panels in color. Three of these panels depict the modern medical branches of pediatrics, surgery, and internal medicine, and include three doctors whose contributions to modern medicine Dr. Lee felt were most important. The fourth panel depicts modern technology.

Underneath each of the colored fresco panels is a smaller monochromatic panel depicting a contrasting primitive method of treatment. Beginning on the left of the entrance wall, the first colored fresco is of Emmett Holt (1855-1924) a distinguished

⁵³ *An Architect Grows up in Palo Alto: Memoirs of Birge Malcom Clark, F.A.I.A.*, (typescript: 1982), 69.

⁵⁴ *Ibid.* The nine-story addition was never constructed.

⁵⁵ *News and Notes – Medical Murals*, Palo Alto Medical Clinic, August 1959. Also, *San Francisco Chronicle* (San Francisco, CA), "Artists Can Do Better Than A Dick McSmear," 10/3/1955.

⁵⁶ Stanford Historical Society, *Memorial Revolution: Victor Arnautoff (1896-1979)*, n.d.

⁵⁷ *Ibid.*

⁵⁸ "The Chapel, Hallowed Ground" at: http://www.interfaith-presidio.org/the_chapel.html (accessed 10.19.2009). Also "Victor Arnautoff, 1896-1979," at: <http://www.helfenfinearts.com/biogs/arnautoffFset.html> (accessed 10.19.2009).

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American pediatrician and a pioneer in children's diseases. The monochromatic panel beneath him has a Flathead Indian pressing a board against an infant's head to produce a sloping forehead, believed to be a sign of intelligence. The next color panel, located between the window and door, is of Sir William Osler (1849-1919) a Canadian internist, highly regarded teacher and writer on medicine. His contrasting monochromatic panel depicts a witch doctor exorcising evil spirits. The third colored panel, to the right of the entrance door, is of Harvey Cushing (1869-1939) a Boston neurosurgeon who refined the use of the Albee saw. Beneath him the monochromatic fresco is of a wound being cauterized with a hot poker. The final color panel, between the right window and far wall, shows an early form of x-ray, a fluoroscope, being used. This panel is in contrast with the monochromatic fresco beneath depicting the use of horoscopes to diagnose illness.

Underneath each window on the entrance wall is a monochromatic fresco with a reclining man and woman. The left-hand fresco depicts the woman holding a scythe and the man a set of scales; in the right-hand fresco the woman holds a laurel wreath and the man a sword. Beneath the windows on the two end walls of the entrance loggia are monochrome frescoes depicting the modern microscope and Bunsen burner (left end) and the old remedies of herbs and roots (right end). Above the entrance door is a narrow monochromatic fresco with a skull and a snake surrounded by books representing knowledge.⁵⁹

Arnautoff's cohesive design integrated the frescoes with the wall's fenestration and door to produce a unified, rhythmic, and forceful composition. The predominant colors in the murals echo the warm tones of the red clay tile roof, the blue green tones of the cornice molding, window and door trim, and the beige tones of the medallions. Similar colors appeared on the interior in the original tile floors, warm Flexwood walls and the beige window sill tiles. His subject matter emphasizing the advancement of modern medicine and technology was appropriate for a newly opened medical building, and the depiction of pediatrics, internal medicine, surgery, and x-ray technology focused on the broad range of medical care that was available at the Palo Alto Clinic.

The murals caused a minor scandal when the clinic building opened in 1932, due to depictions of several patients receiving medical care in a state of partial undress. Palo Alto's reaction was so intense that the controversy was covered in San Francisco newspapers. Under the title, "Murals and Morals: Palo Alto's Pulse Quickens," a San Francisco Chronicle reporter wrote, "The builders, aided and abetted by the nationally known doctors who make up the staff, have gone in for art in a big way, and the startling result has set this little college town by the ears!" The article continued to state that, "the consensus is that a clinic ought to be a clinic, and not an art gallery. Especially a modern art gallery!"⁶⁰ On the first Sunday after the murals were unveiled, the steady stream of townspeople driving along Homer Avenue to see the mural for themselves caused a traffic jam and clinic surgeon Fritz Roth threatened to have the walls whitewashed before he would move in. In time, the uproar faded away and the artwork became a fixture.⁶¹

CONCLUSION

From its conception, the Palo Alto Clinic was a leader in advancing Palo Alto's health care resources. The early group practice introduced new innovations in the practice of medicine and the use of new medical technology to both in Palo Alto and the Bay Area. It drew patients not only from the immediate community but from throughout the Peninsula, featured specialists as part of the Clinic's practice, and attracted accomplished physicians from around the nation that were interested in the Clinic's facilities and its use of new technology. The legacy of the Palo Alto Medical Clinic is closely associated with the long pattern of events that helped to establish Palo Alto's health care industry as one of the leading medical networks in the country.

⁵⁹ *News and Notes*, Palo Alto Medical Clinic, 1959.

⁶⁰ *San Francisco Chronicle* (San Francisco, CA), "Paintings of Seminudes In Clinic Stir Palo Alto", 21 August 1932.

⁶¹ Palo Alto Medical Foundation website, "A Moral Dispute Over Murals," <http://www.pamf.org/about/pamfhistory/moral.html> (Accessed 10.20.2009).

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300 Homer Avenue was constructed in 1932 to house the newly formed Palo Alto Medical Clinic. It served as a medical building for this organization until its sale to the City of Palo Alto in 2000. The Spanish Eclectic style was the architectural style of choice in Palo Alto throughout the early part of the 20th century and the interior was specifically designed to form an efficient medical clinic operation. The decorative features throughout the building are of a high quality and design that is atypical for modern medical facilities, imparting an overall welcoming character that exemplified the Clinic's mission and dedication to the surrounding community of Palo Alto. Overall, the building retains a high degree of integrity despite years of continued use as a medical facility. The architectural design and historic character of the original clinic building is still intact, despite removal of the later rear wings.

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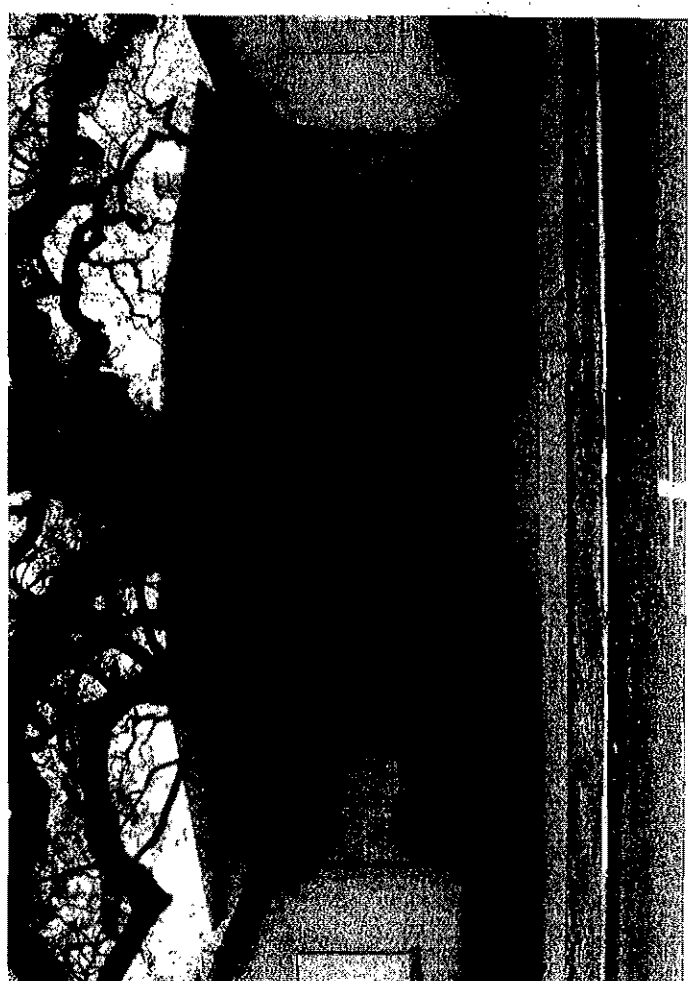
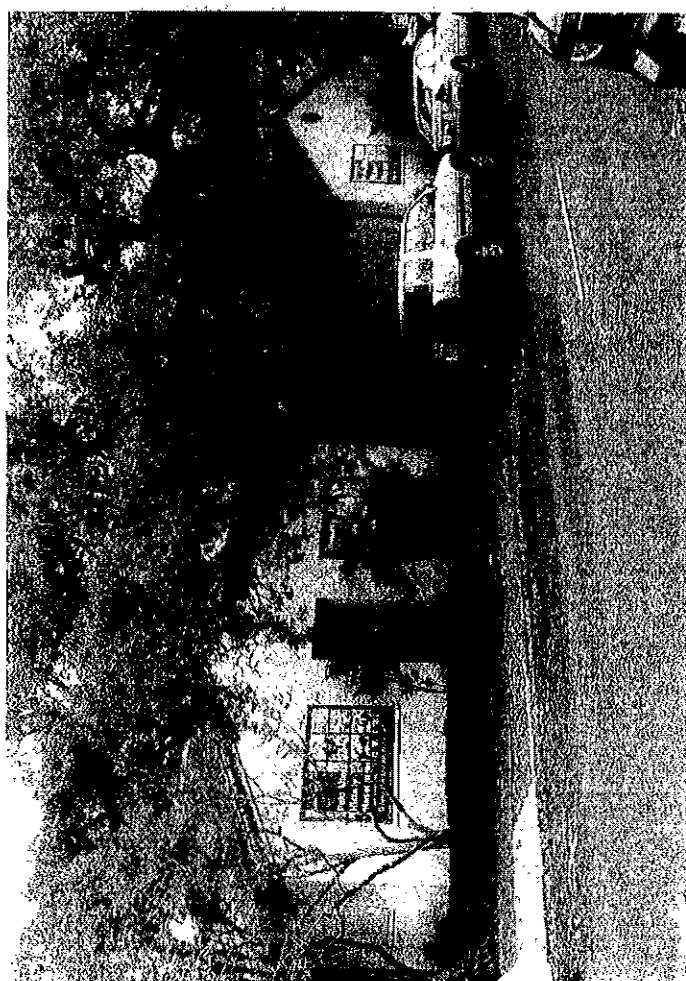
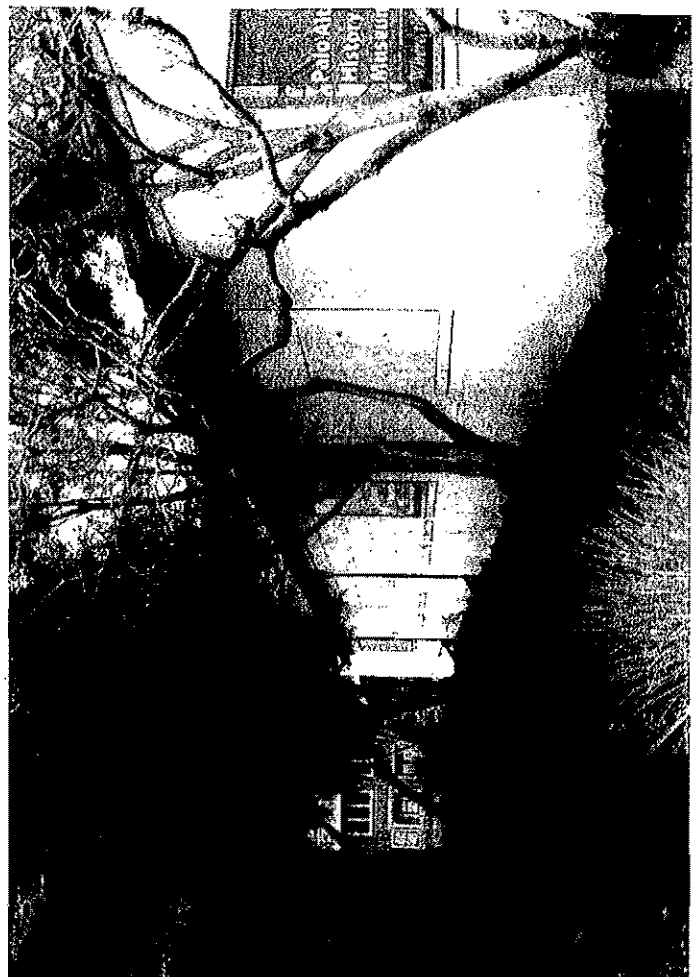
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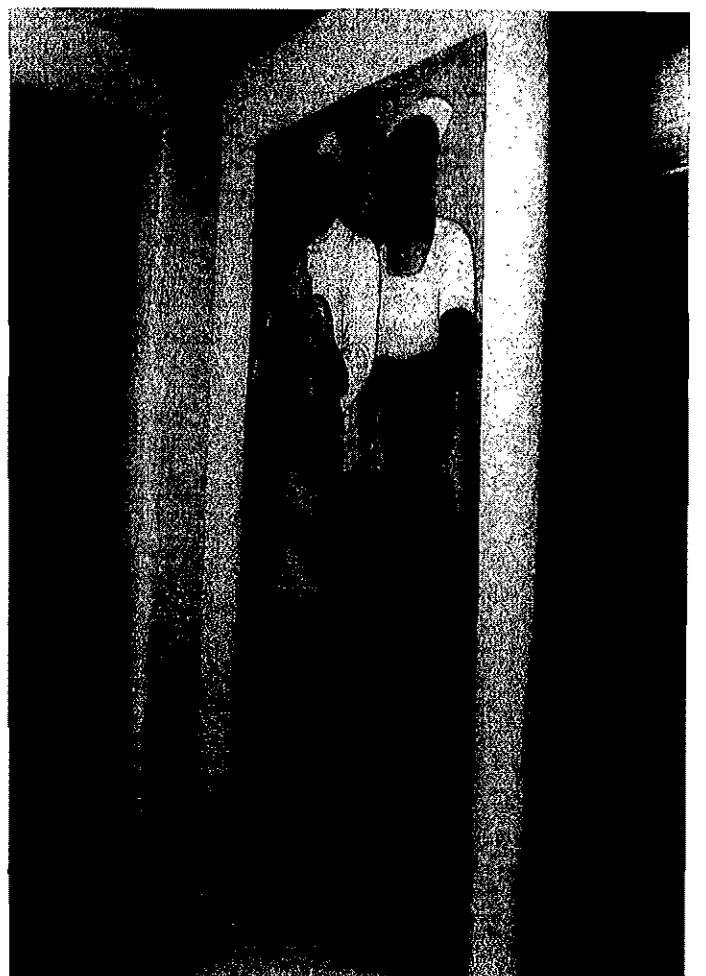
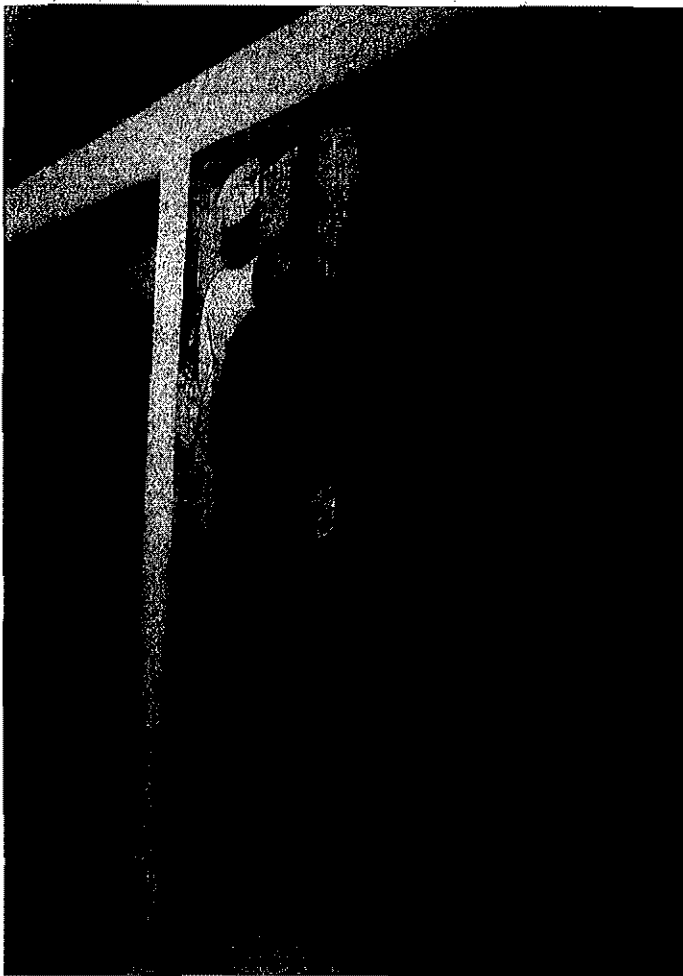
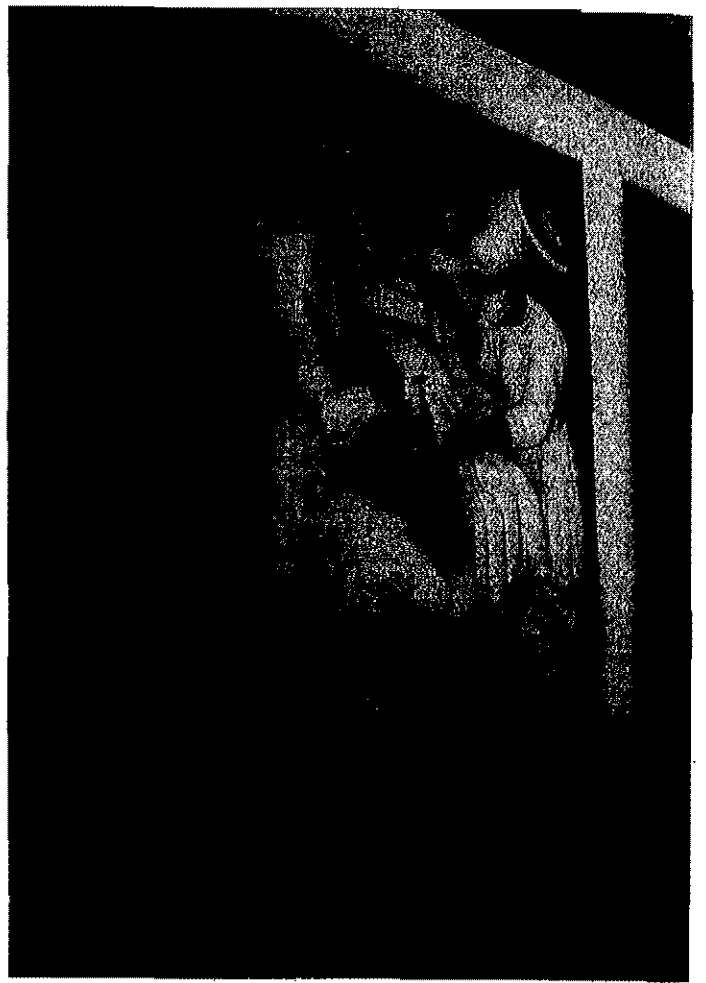
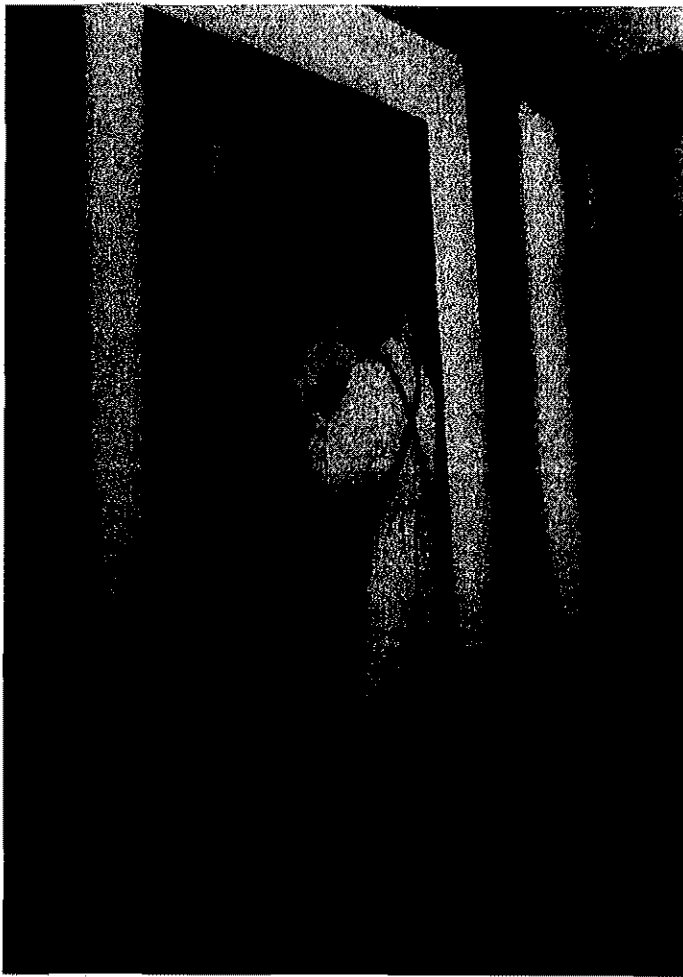
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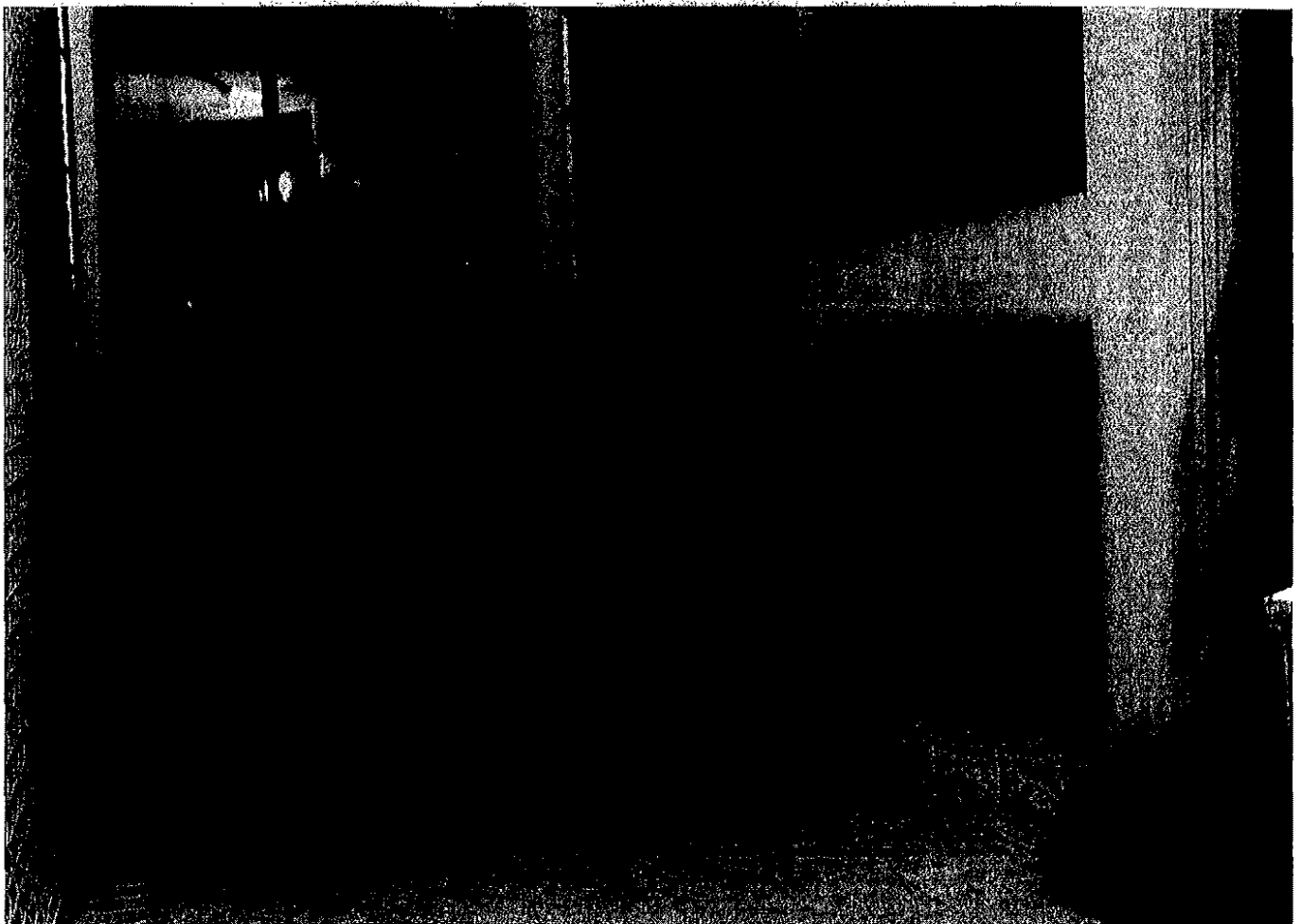
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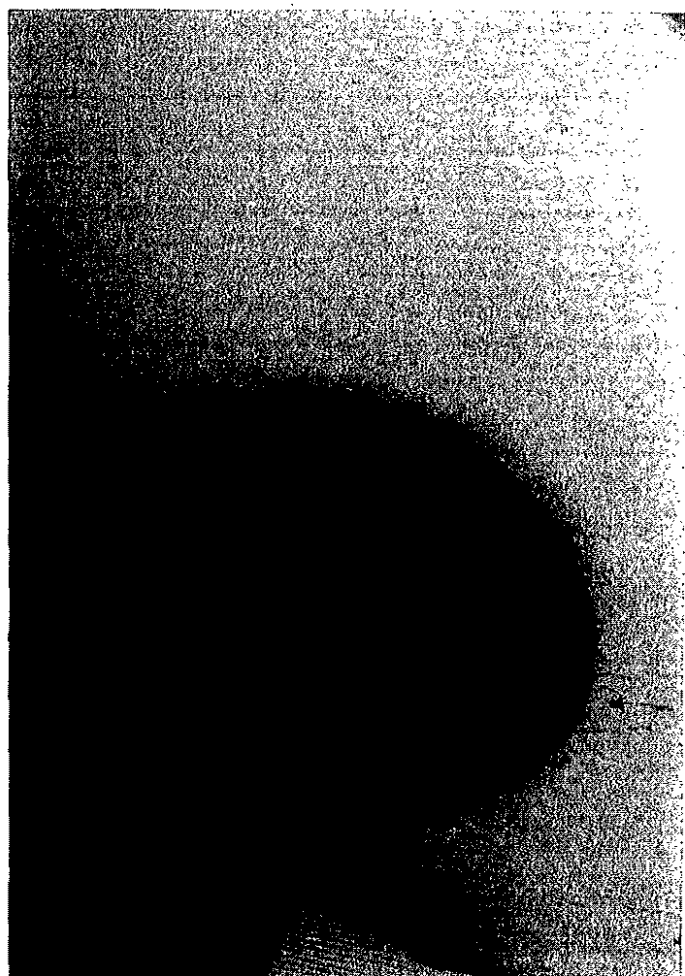
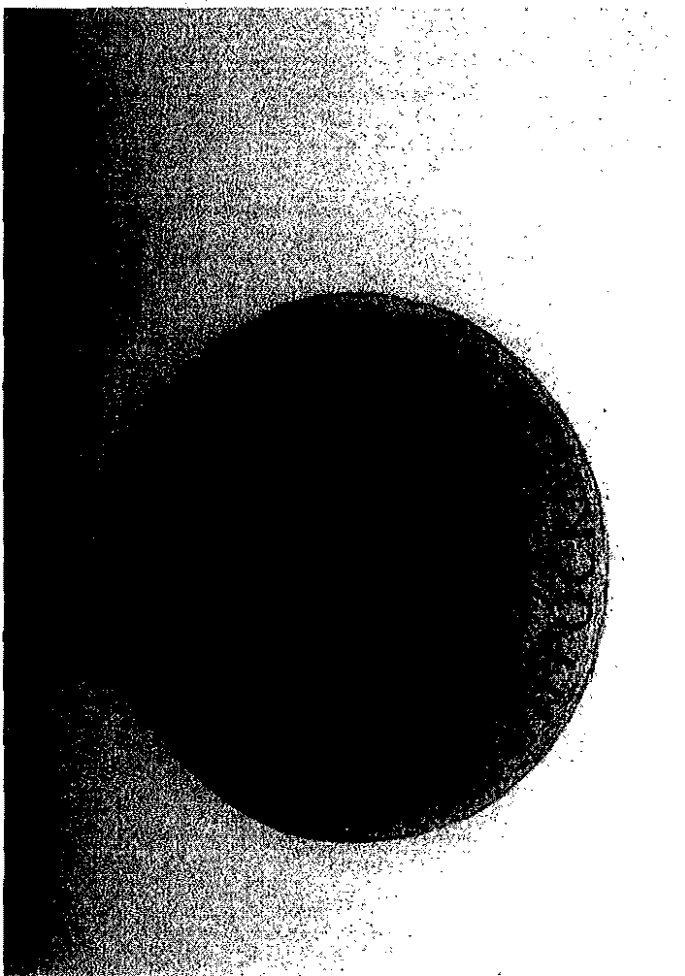
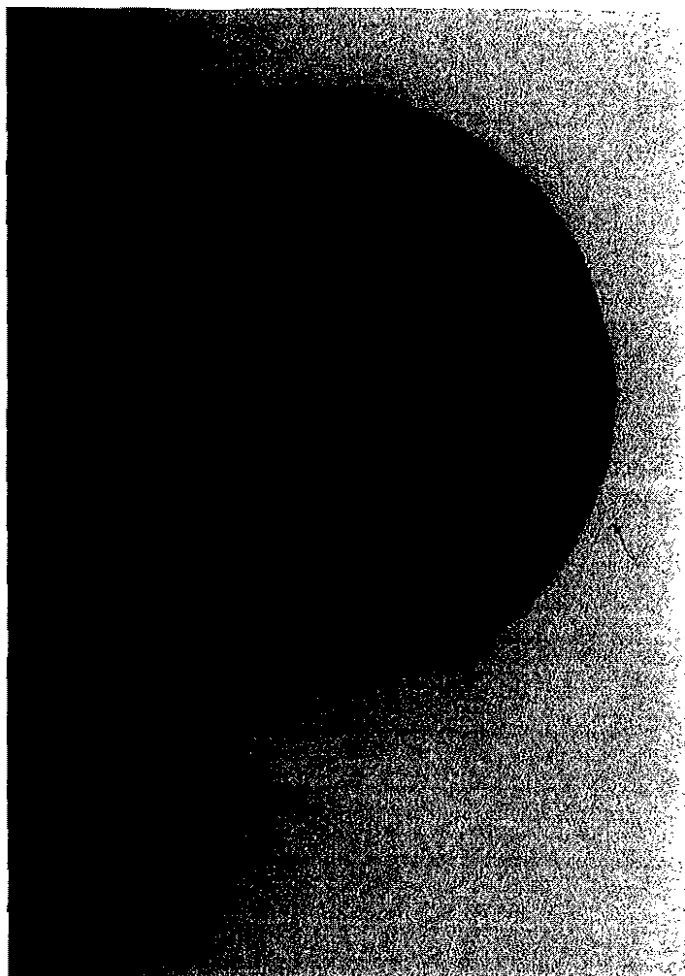
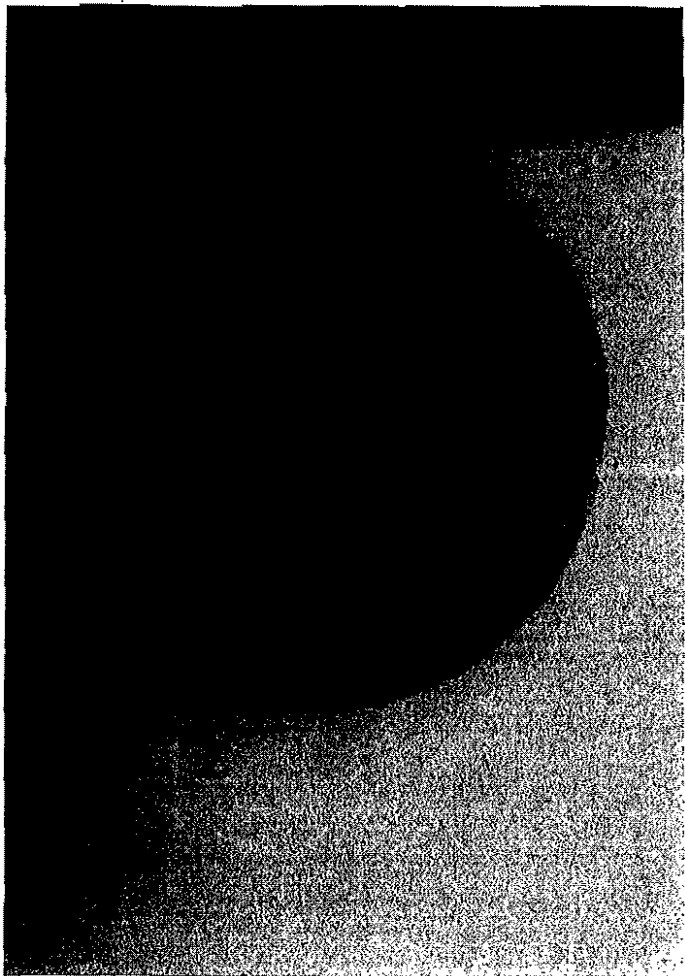
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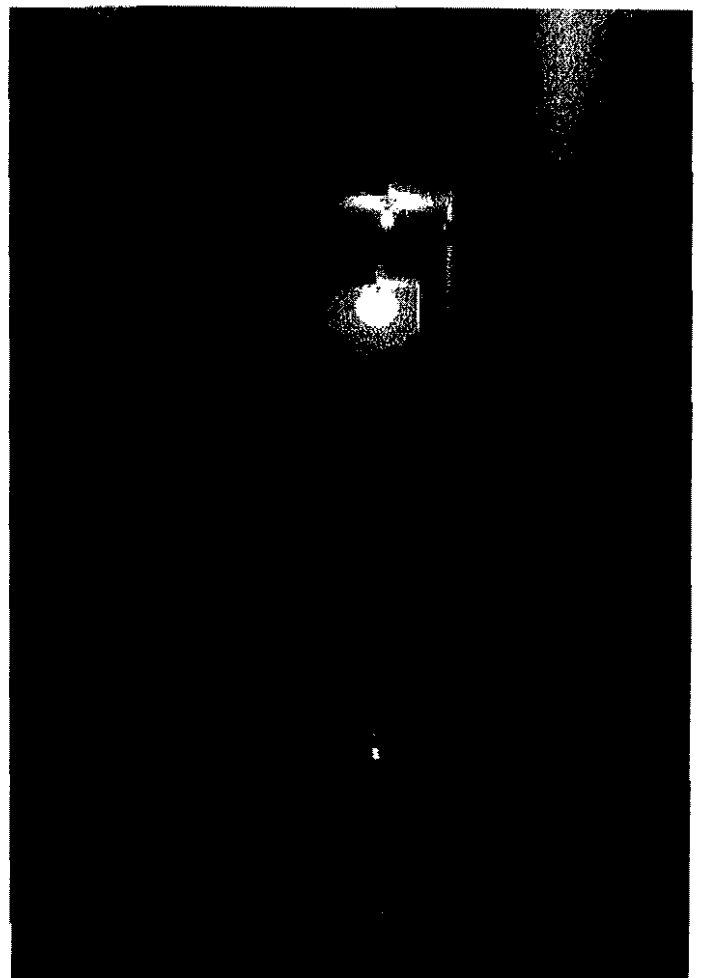
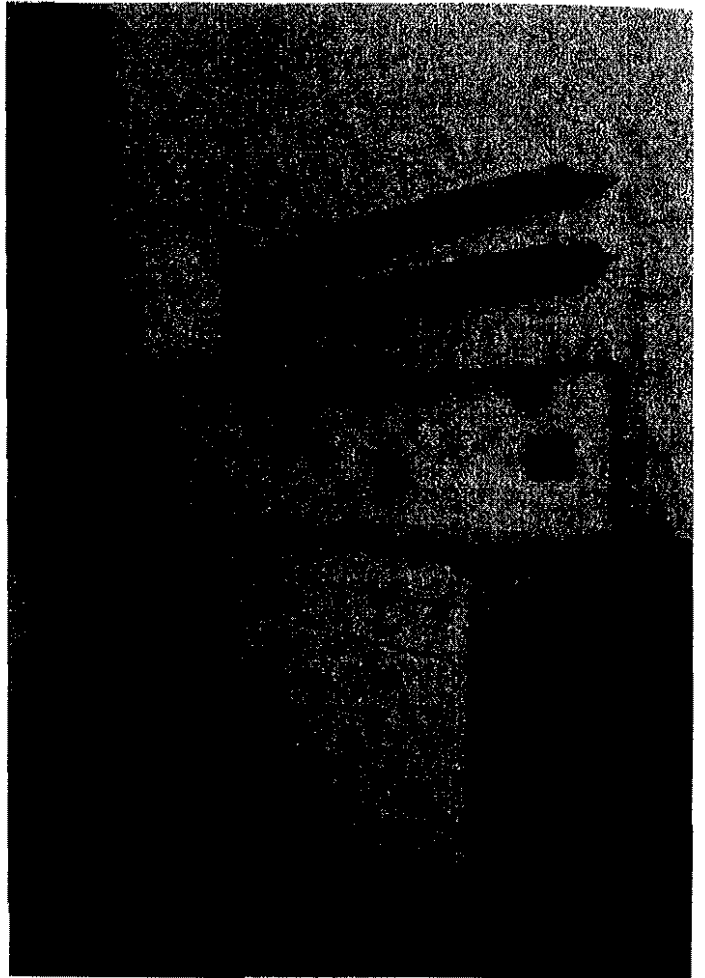
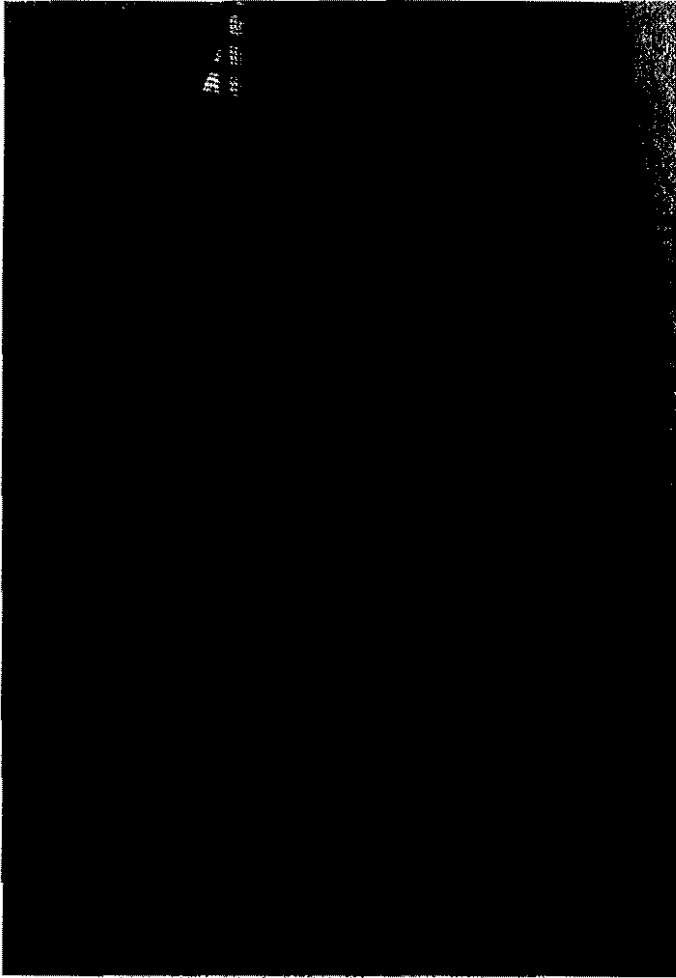
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NATIONAL REGISTER BULLETIN



How to Apply the National Register Criteria for Evaluation



The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

This material is partially based upon work conducted under a cooperative agreement with the National Conference of State Historic Preservation Officers and the U.S. Department of the Interior.

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Cover

(Top Left) Criterion B - Frederick Douglass Home, Washington, D.C. From 1877-1899, this was the home of Frederick Douglass, the former slave who rose to become a prominent author, abolitionist, editor, orator, and diplomat. (Walter Smalling, Jr.)

(Top Right) Criterion D - Francis Canyon Ruin, Blanco vicinity, Rio Arriba County, New Mexico. A fortified village site composed of 40 masonry-walled rooms arranged in a cluster of four house blocks. Constructed ca. 1716-1742 for protection against raiding Utes and Comanches, the site has information potential related to Navajo, Pueblo, and Spanish cultures. (Jon Samuelson)

(Bottom Left) Criterion C - Bridge in Cherrytree Township, Venago County, Pennsylvania. Built in 1882, this Pratt through truss bridge is significant for engineering as a well preserved example of a type of bridge frequently used in northwestern Pennsylvania in the late 19th century. (Pennsylvania Department of Transportation)

(Bottom Right) Criterion A - Main Street/Market Square Historic District, Houston, Harris County, Texas. Until well into the 20th century this district marked the bounds of public and business life in Houston. Constructed between the 1870s and 1920s, the district includes Houston's municipal and county buildings, and served as the city's wholesale, retail, and financial center. (Paul Hester)

PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.¹

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects signifi-

cant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, which are uniform, national standards for preservation activities.²

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antonette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

¹Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at www.cr.nps.gov/nr or by contacting any of the historic preservation offices in the States and territories.

²The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of

historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*.)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or

- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:³

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

CRITERIA CONSIDERATIONS:

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

- c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- d. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.

³The Criteria for Evaluation are found in the Code of Federal Regulations, Title 36, Part 60, and are reprinted here in full.

III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- **Being associated with an important historic context and**
- **Retaining historic integrity of those features necessary to convey its significance.**

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV). A property must be classified as

a district, site, building, structure, or object for inclusion in the National Register.

2. **Determine which prehistoric or historic context(s) the property represents (Part V).** A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.

4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.
5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form.*)

IV. HOW TO DEFINE CATEGORIES OF HISTORIC PROPERTIES

The National Register of Historic Places includes significant properties, classified as buildings, sites, districts, structures, or objects. It is not used to list intangible values, except in so far as they are associated with or reflected by historic properties. The National Register does not list cultural events, or skilled or talented individuals, as is done in some countries. Rather, the National Register is oriented to recognizing physically concrete properties that are relatively fixed in location.

For purposes of National Register nominations, small groups of properties are listed under a single category, using the primary resource. For example, a city hall and fountain would be categorized by the city hall (building), a farmhouse with two outbuildings would be categorized by the farmhouse (building), and a city park with a gazebo would be categorized by the park (site). Properties with large acreage or a number of resources are usually considered districts. Common sense and reason should dictate the selection of categories.

BUILDING

A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Buildings eligible for the National Register must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The

whole building must be considered, and its significant features must be identified.

If a building has lost any of its basic structural elements, it is usually considered a "ruin" and is categorized as a site.

Examples of buildings include:

*administration building
carriage house
church
city or town hall
courthouse
detached kitchen, barn, and privy
dormitory
fort
garage
hotel
house
library
mill building
office building
post office
school
social hall
shed
stable
store
theater
train station*

STRUCTURE

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Structures nominated to the National Register must include all of the extant basic structural elements. Parts of structures can not be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting

piers, all of which, if extant, must be included when considering the property for eligibility.

If a structure has lost its historic configuration or pattern of organization through deterioration or demolition, it is usually considered a "ruin" and is categorized as a site.

Examples of structures include:

*aircraft
apiary
automobile
bandstand
boats and ships
bridge
cairn
canal
carousel
corncrib
dam
earthwork
fence
gazebo
grain elevator
highway
irrigation system
kiln
lighthouse
railroad grade
silo
trolley car
tunnel
windmill*

OBJECT

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.

Examples of objects include:

*boundary marker
fountain
milepost
monument
sculpture
statuary*

SITE

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A site can possess associative significance or information potential or both, and can be significant under any or all of the four criteria. A site need not be marked by physical remains if it is the location of a prehistoric or historic event or pattern of events and if no buildings, structures, or objects marked it at the time of the events. However, when the location of a prehistoric or historic event cannot be conclusively determined because no other cultural materials were present or survive, documentation must be carefully evaluated to determine whether the traditionally recognized or identified site is accurate.

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events, if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of "site" natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality's subsequent economic development. While they may have been "avenues of exploration," the features most appropriate to document this significance are the properties built in association with the waterways.

Examples of sites include:

*battlefield
campsite
cemeteries significant for information potential or historic association
ceremonial site
designed landscape
habitation site
natural feature (such as a rock formation) having cultural significance
petroglyph
rock carving
rock shelter
ruins of a building or structure
shipwreck
trail
village site*

DISTRICT

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

CONCENTRATION, LINKAGE, & CONTINUITY OF FEATURES

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or

commercial buildings, sites, structures, or objects. A district can also be a grouping of archeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

SIGNIFICANCE

A district must be significant, as well as being an identifiable entity. It must be important for historical, architectural, archeological, engineering, or cultural values. Therefore, districts that are significant will usually meet the last portion of Criterion C plus Criterion A, Criterion B, other portions of Criterion C, or Criterion D.

TYPES OF FEATURES

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity. In archeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

GEOGRAPHICAL BOUNDARIES

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

DISCONTIGUOUS DISTRICTS

A district is usually a single geographic area of contiguous historic properties; however, a district can also be composed of two or more definable significant areas separated by nonsignificant areas. A discontinuous district is most appropriate where:

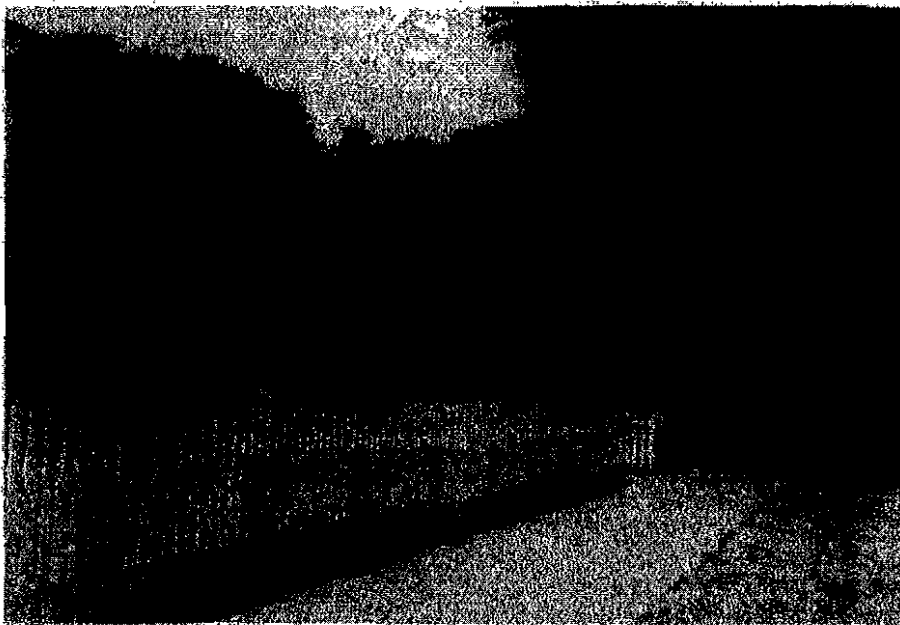
- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

In addition, a canal can be treated as a discontinuous district when the system consists of man-made sections of canal interspersed with sections of river navigation. For scattered archeological properties, a discontinuous district is appropriate when the deposits are related to each other through cultural affiliation, period of use, or site type.

It is not appropriate to use the discontinuous district format to include an isolated resource or small group of resources which were once connected to the district, but have since been separated either through demolition or new construction. For example, do not use the discontinuous district format to nominate individual buildings of a downtown commercial district that have become isolated through demolition.

Examples of districts include:

*business districts
canal systems
groups of habitation sites
college campuses
estates and farms with large acreage/
numerous properties
industrial complexes
irrigation systems
residential areas
rural villages
transportation networks
rural historic districts*



Ordeman-Shaw Historic District, Montgomery, Montgomery County, Alabama. Historic districts derive their identity from the interrelationship of their resources. Part of the defining characteristics of this 19th-century residential district in Montgomery, Alabama, is found in the rhythmic pattern of the rows of decorative porches. (Frank L. Thiermonge, III)

V. HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

UNDERSTANDING HISTORIC CONTEXTS

To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. This section explains how to evaluate a property within its historic context.¹

The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear. Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe this phenomena such as trend, pattern, theme, or cultural affiliation, but ultimately the concept is the same.

The concept of historic context is not a new one; it has been fundamental to the study of history since the 18th century and, arguably, earlier than that. Its core premise is that resources, properties, or happenings in history do not occur in a vacuum but rather are part of larger trends or patterns.

In order to decide whether a property is significant within its historic context, the following five things must be determined:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.

These five steps are discussed in detail below. If the property being evaluated does represent an important aspect of the area's history or prehistory *and* possesses the requisite quality of integrity, then it qualifies for the National Register.

HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance.

Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area. Historic contexts may have already been defined in your area by the State historic preservation office, Federal agencies, or local governments. In accordance with the National Register Criteria, the historic context may relate to one of the following:

- An event, a series of events or activities, or patterns of an area's development (Criterion A);
- Association with the life of an important person (Criterion B);
- A building form, architectural style, engineering technique, or artistic values, based on a stage of physical development, or the use of a material or method of construction that shaped the historic identity of an area (Criterion C); or
- A research topic (Criterion D).

¹For a complete discussion of historic contexts, see *National Register Bulletin: Guidelines for Completing National Register of Historic Places Registration Forms*.

Determine how the theme of the context is significant in the history of the local area, the State, or the nation.

A theme is a means of organizing properties into coherent patterns based on elements such as environment, social/ethnic groups, transportation networks, technology, or political developments that have influenced the development of an area during one or more periods of prehistory or history. A theme is considered significant if it can be demonstrated, through scholarly research, to be important in American history. Many significant themes can be found in the following list of Areas of Significance used by the National Register.

AREAS OF SIGNIFICANCE

Agriculture
Architecture
Archeology
 Prehistoric
 Historic—Aboriginal
 Historic—Non-Aboriginal
Art
Commerce
Communications
Community Planning and Development
Conservation
Economics
Education
Engineering
Entertainment/Recreation
Ethnic Heritage
 Asian
 Black
 European
 Hispanic
 Native American
 Pacific Islander
 Other
Exploration/Settlement
Health/Medicine
Industry
Invention
Landscape Architecture
Law
Literature
Maritime History
Military
Performing Arts
Philosophy
Politics/Government
Religion
Science
Social History
Transportation
Other

Determine what the property type is and whether it is important in illustrating the historic context.

A context may be represented by a variety of important property types. For example, the context of "Civil War Military Activity in Northern Virginia" might be represented by such properties as: a group of mid-19th century fortification structures; an open field where a battle occurred; a knoll from which a general directed troop movements; a sunken transport ship; the residences or public buildings that served as company headquarters; a railroad bridge that served as a focal point for a battle; and earthworks exhibiting particular construction techniques.

Because a historic context for a community can be based on a distinct period of development, it might include numerous property types. For example, the context "Era of Industrialization in Grand Bay, Michigan, 1875 - 1900" could be represented by important property types as diverse as sawmills, paper mill sites, salt refining plants, flour mills, grain elevators, furniture factories, workers housing, commercial buildings, social halls, schools, churches, and transportation facilities.

A historic context can also be based on a single important type of property. The context "Development of County Government in Georgia, 1777 - 1861" might be represented solely by courthouses. Similarly, "Bridge Construction in Pittsburgh, 1870 - 1920" would probably only have one property type.

Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).

For example, the context of county government expansion is represented under Criterion A by historic districts or buildings that reflect population growth, development patterns, the role of government in that society, and political events in the history of the State, as well as the impact of county government on the physical development of county seats. Under Criterion C, the context is represented by properties whose architectural treatments reflect their governmental functions, both practically and symbolically. (See Part VI: *How to Identify the Type of Significance of a Property.*)

Determine what physical features the property must possess in order for it to reflect the significance of the historic context.

These physical features can be determined after identifying the following:

- Which types of properties are associated with the historic context,
- The ways in which properties can represent the theme, and
- The applicable aspects of integrity.

Properties that have the defined characteristics are eligible for listing. (See Part VIII: *How to Evaluate the Integrity of a Property.*)

PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context.*)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types

found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

NATIONAL HISTORIC CONTEXTS

Properties are evaluated in a national context when they represent an aspect of the history of the United States and its territories as a whole. These national historic contexts may have associated properties that are locally or statewide significant representations, as well as those of national significance.

Properties designated as nationally significant and listed in the National Register are the prehistoric and historic units of the National Park System and those properties that have been designated National Historic Landmarks. The National Historic Landmark criteria are the standards for nationally significant properties; they are found in the *Code of Federal*

Regulations, Title 36, Part 65 and are summarized in this bulletin in *Part IX: Summary of National Historic Landmarks Criteria for Evaluation*.

A property with national significance helps us understand the history of the nation by illustrating the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. It must be of exceptional value in representing or illustrating an important theme in the history of the nation.

Nationally significant properties do not necessarily have to belong to a property type found throughout the entire country: they can be located in only a portion of the present political boundaries. It is their historic context that must be important nationwide. For example, the American Civil War

was fought in only a portion of the United States, yet its impact was nationwide. The site of a small military skirmish might be a locally significant representation of this national context, while the capture of the State's largest city might be a statewide significant representation of the national context.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program 1987*. (For more information about the National Historic Landmarks program, please write to the Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

Associative value (Criteria A and B): Properties significant for their association or linkage to events (Criterion A) or persons (Criterion B) important in the past.

Design or Construction value (Criterion C): Properties significant as representatives of the manmade expression of culture or technology.

Information value (Criterion D): Properties significant for their ability to yield important information about prehistory or history.

*For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin.

CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

UNDERSTANDING CRITERION A: EVENT

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity. (See *Part V: How to Evaluate a Property Within its Historic Context.*)

Several steps are involved in determining whether a property is significant for its associative values:

- Determine the nature and origin of the property,
- Identify the historic context with which it is associated, and
- Evaluate the property's history to determine whether it is associated with the historic context in any important way.

APPLYING CRITERION A: EVENT

TYPES OF EVENTS

A property can be associated with either (or both) of two types of events:

- A specific event marking an important moment in American prehistory or history and
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Refer to the sidebar on the right for a list of specific examples.

ASSOCIATION OF THE PROPERTY WITH THE EVENTS

The property you are evaluating must be documented, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events. A property is *not* eligible if its associations are speculative. For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

SIGNIFICANCE OF THE ASSOCIATION

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

EXAMPLES OF PROPERTIES ASSOCIATED WITH EVENTS

Properties associated with specific events:

- The site of a battle.
- The building in which an important invention was developed.
- A factory district where a significant strike occurred.
- An archeological site at which a major new aspect of prehistory was discovered, such as the first evidence of man and extinct Pleistocene animals being contemporaneous.
- A site where an important facet of European exploration occurred.

Properties associated with a pattern of events:

- A trail associated with western migration.
- A railroad station that served as the focus of a community's transportation system and commerce.
- A mill district reflecting the importance of textile manufacturing during a given period.
- A building used by an important local social organization.
- A site where prehistoric Native Americans annually gathered for seasonally available resources and for social interaction.
- A downtown district representing a town's growth as the commercial focus of the surrounding agricultural area.

TRADITIONAL CULTURAL VALUES

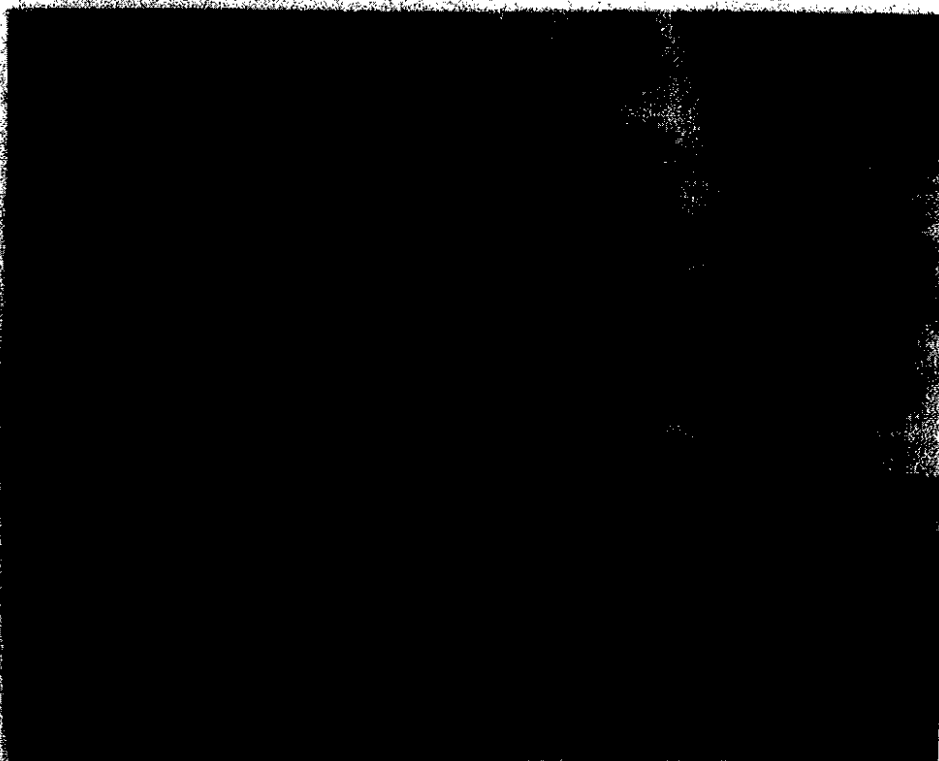
Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.⁵

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.



Criterion A - The Old Bruley Plantation, Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Bruley, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).

⁵ For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

UNDERSTANDING CRITERION B: PERSON*

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements. (The policy regarding commemorative properties, birthplaces, and graves is explained further in Part VIII: How to Apply the Criteria Considerations.)

Several steps are involved in determining whether a property is significant for its associative values under Criterion B. First, determine the importance of the individual. Second, ascertain the length and nature of his/her association with the property under study and identify the other properties associated with the individual. Third, consider the property under Criterion B, as outlined below.

EXAMPLES OF PROPERTIES ASSOCIATED WITH PERSONS

Properties associated with a Significant Person:

- The home of an important merchant or labor leader.
- The studio of a significant artist.
- The business headquarters of an important industrialist.



Criterion B - The William Whitney House, Hinsdale, DuPage County, Illinois. This building is locally significant for its historical association with William Whitney, the founder of the town of Hinsdale, Illinois. Whitney, a citizen of New York State, moved to Illinois, established the town, and while living here between 1870 and 1879 was a prominent local businessman and politician. (Photo by Frederick C. Guo).

*For further information on properties eligible under Criterion B, refer to National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons.

APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

The persons associated with the property must be *individually* significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

- The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

- A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant or if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

ASSOCIATION WITH LIVING PERSONS

Properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge. (See Criteria Considerations C and G in *Part VII: How to Apply the Criteria Considerations*.)

ASSOCIATION WITH ARCHITECTS/ARTISANS

Architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

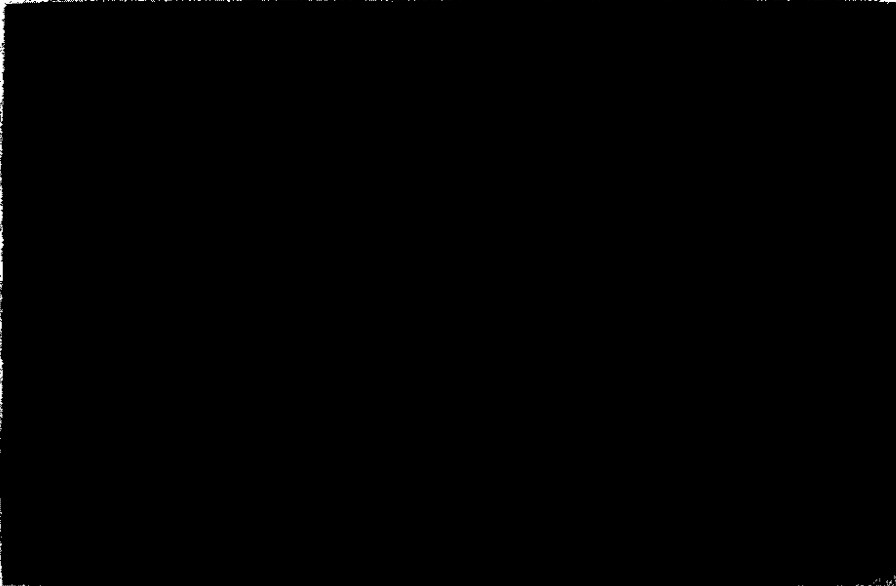
NATIVE AMERICAN SITES

The known major villages of individual Native Americans who were important during the contact period or later can qualify under Criterion B. As with all Criterion B properties, the individual associated with the property must have made some specific important contribution to history. Examples include sites significantly associated with Chief Joseph and Geronimo.⁷

⁷For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.



Richland Plantation, East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).

UNDERSTANDING CRITERION C: DESIGN/ CONSTRUCTION

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet at least one of the following requirements:

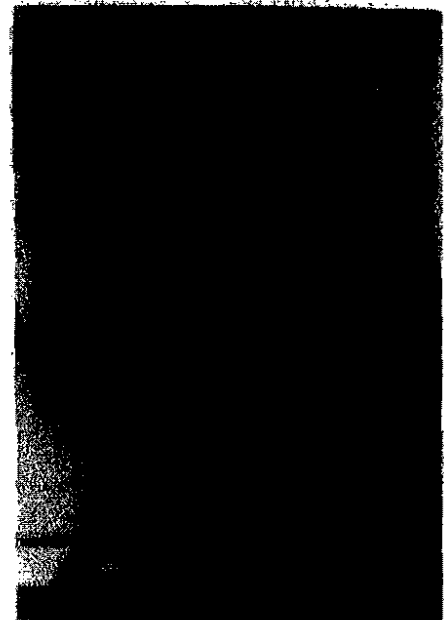
- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.

- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources "that represent a significant and distinguishable entity whose components may lack individual distinction" are called "districts." In the Criteria for Evaluation (as published in the Code of Federal Regulations and reprinted here in Part II), districts are

defined within the context of Criterion C. Districts, however, can be considered for eligibility under all the Criteria, individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in Part IV: *How to Define Categories of Historic Properties*. Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.



Grant Family House, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Mohnsey).

EXAMPLES OF PROPERTIES ASSOCIATED WITH DESIGN/CONSTRUCTION

Properties associated with design and construction:

- A house or commercial building representing a significant style of architecture.
- A designed park or garden associated with a particular landscape design philosophy.
- A movie theater embodying high artistic value in its decorative features.
- A bridge or dam representing technological advances.

APPLYING CRITERION C: DESIGN/CONSTRUCTION

DISTINCTIVE CHARACTERISTICS OF TYPE, PERIOD, AND METHOD OF CONSTRUCTION

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.

Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. 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.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Eligible

- A building eligible under the theme of Gothic Revival architecture must have the distinctive characteristics that make up the vertical and picturesque qualities of the style, such as pointed gables, steep roof pitch, board and batten siding, and ornamental bargeboard and veranda trim.
- A late Mississippian village that illustrates the important concepts in prehistoric community design and planning will qualify.
- A designed historic landscape will qualify if it reflects a historic trend or school of theory and practice, such as the City Beautiful Movement, evidencing distinguished design, layout, and the work of skilled craftsmanship.

Not Eligible

- A commercial building with some Art Deco detailing is not eligible under Criterion C if the detailing was added merely as an afterthought, rather than fully integrated with overall lines and massing typical of the Art Deco style or the transition between that and another style.
- A designed landscape that has had major changes to its historic design, vegetation, original boundary, topography/grading, architectural features, and circulation system will not qualify.

Type, Period, and Method of Construction: "Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

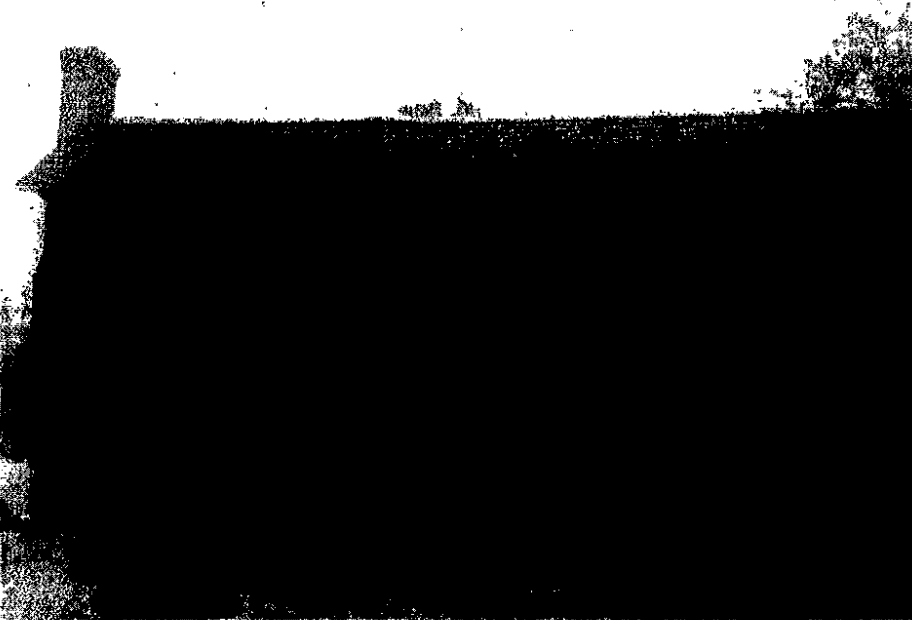
A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.

Eligible

- A building that has some characteristics of the Romanesque Revival style and some characteristics of the Commercial style can qualify if it illustrates the transition of architectural design and the transition itself is considered an important architectural development.
- A Hopewellian mound, if it is an important example of mound building construction techniques, would qualify as a method or type of construction.
- A building which illustrates the early or the developing technology of particular structural systems, such as skeletal steel framing, is eligible as an example of a particular method of construction.



Swan Falls Dam and Power Plant, Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).



Looney House, Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).

HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodeling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.

WORKS OF A MASTER

A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context.

PROPERTIES POSSESSING HIGH ARTISTIC VALUES

High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.

Eligible

- A sculpture in a town square that epitomizes the design principles of the Art Deco style is eligible.
- A building that is a classic expression of the design theories of the Craftsman Style, such as carefully detailed handwork, is eligible.
- A landscaped park that synthesizes early 20th century principles of landscape architecture and expresses an aesthetic ideal of environment can be eligible.
- Properties that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans, are eligible.

Not Eligible

- A sculpture in a town square that is a typical example of sculpture design during its period would not qualify for high artistic value, although it might be eligible if it were significant for other reasons.
- A building that is a modest example (within its historic context) of the Craftsman Style of architecture, or a landscaped park that is characteristic of turn of the century landscape design would not qualify for high artistic value.

A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction. This portion of Criterion C refers to districts. For detailed information on districts, refer to *Part IV* of this bulletin.

CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current

data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.

property. Research questions can be related to property-specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location. These questions may be derived from the academic community or from preservation programs at the local, regional, State, or national level. Research questions are usually developed as part of a "research design," which specifies not only the questions to be asked, but also the types of data needed to supply the answers, and often the techniques needed to recover the data.

Criterion D - Champ-Fremont I Archaeological Site, Omaha vicinity, Douglas County, Nebraska. This archaeological site, dating from ca. 1100-1450 A.D., consists of pit houses and storage pits which have the potential to yield important information concerning the subsistence patterns, religious and mortuary practices, and social organization of the prehistoric residents of eastern Nebraska. (Nebraska State Historical Society)

ASSOCIATION WITH HUMAN ACTIVITY

A property must be associated with human activity and be critical for understanding a site's historic environment in order to be eligible under Criterion D. A property can be linked to human activity through events, processes, institutions, design, construction, settlement, migration, ideals, beliefs, lifeways, and other facets of the development or maintenance of cultural systems.

The natural environment associated with the properties was often very different from that of the present and strongly influenced cultural development. Aspects of the environment that are pertinent to human activities should be considered when evaluating properties under Criterion D.

Natural features and paleontological (floral and faunal) sites are not usually eligible under Criterion D in and of themselves. They can be eligible, however, if they are either directly related to human activity or critical to understanding a site's historic environment. In a few cases, a natural feature or site unmarked by cultural materials, that is primarily eligible under Criterion A, may also be eligible under Criterion D, if study of the feature, or its location, setting, etc. (usually in the context of data gained from other sources), will yield important information about the event or period with which it is associated.

ESTABLISHING A HISTORIC CONTEXT

The information that a property yields, or will yield, must be evaluated within an appropriate historic context. This will entail consulting the body of information already collected from similar properties or other pertinent sources, including modern and historic written records. The researcher must be able to anticipate if and how the potential information will affect the definition of the context. The information likely to be obtained from a particular property must confirm, refute, or supplement in an important way existing information.

A property is not eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained.

DEVELOPING RESEARCH QUESTIONS

Having established the importance of the information that may be recovered, it is necessary to be explicit in demonstrating the connection between the important information and a specific property. One approach is to determine if specific important research questions can be answered by the data contained in the

Eligible

- When a site consisting of a village occupation with midden deposits, hearths, ceramics, and stratified evidence of several occupations is being evaluated, three possible research topics could be: 1) the question of whether the site occupants were indigenous to the area prior to the time of occupation or recent arrivals, 2) the investigation of the settlement-subsistence pattern of the occupants, 3) the question of whether the region was a center for the domestication of plants. Specific questions could include: A) Do the deposits show a sequential development or sudden introduction of Ceramic Type X? B) Do the dates of the occupations fit our expectations based on the current model for the reoccupation behavior of slash-and-burn agriculturalists? C) Can any genetic changes in the food plant remains be detected?

Not Eligible

- A property is not eligible if so little can be understood about it that it is not possible to determine if specific important research questions can be answered by data contained in the property.

ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

COMPLETELY EXCAVATED SITES

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion A. Such sites must be significant for associative values related to: 1) the importance of the data gained or 2) the impact of the property's role in the history of the development of anthropology/ archeology or other relevant disciplines. Like other historic properties, the site must retain the ability to convey its association as the former repository of important information, the location of historic events, or the representative of important trends.

Eligible

- A property that has been excavated is eligible if the data recovered was of such importance that it influenced the direction of research in the discipline, as in a site that clearly established the antiquity of the human occupation of the New World. (See Criterion A in *Part VI: How to Identify the Type of Significance of a Property* and *Criteria Consideration G* in *Part VII: How to Apply the Criteria Considerations*.)

Not Eligible

- A totally excavated site that at one time yielded important information but that no longer can convey either its historic/ prehistoric utilization or significant modern investigation is not eligible.

VII. HOW TO APPLY THE CRITERIA CONSIDERATIONS

INTRODUCTION

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties *can* be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity). *Part VII* provides guidelines for determining which properties must meet these special requirements and for applying each Criteria Consideration.

The Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district. These are the general steps to follow when applying the Criteria Considerations to your property:

- Before looking at the Criteria Considerations, make sure your property meets one or more of the four Criteria for Evaluation and possesses integrity.
- If it does, check the Criteria Considerations (next column) to see if

the property is of a type that is usually excluded from the National Register. The sections that follow also list specific examples of properties of each type. If your property clearly *does not* fit one of these types, then it does not need to meet any special requirements.

- If your property *does* fit one of these types, then it must meet the special requirements stipulated for that type in the Criteria Considerations.

CRITERIA CONSIDERATIONS*

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

- b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- d. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events; or
- e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- g. a property achieving significance within the past 50 years if it is of exceptional importance.

*The Criteria Considerations are taken from the Criteria for Evaluation, found in the *Code of Federal Regulations, Title 36, Part 60.*

CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.

UNDERSTANDING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property requires justification on architectural, artistic, or historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief. Historic significance for a religious property cannot be established on the merits of a religious doctrine, but rather, for architectural or artistic values or for important historic or cultural forces that the property represents. A religious property's significance under Criterion A, B, C, or D must be judged in purely secular terms. A religious group may, in some cases, be considered a cultural group whose activities are significant in areas broader than religious history.

Criteria Consideration for Religious Properties applies:

- If the resource was constructed by a religious institution.
- If the resource is presently owned by a religious institution or is used for religious purposes.
- If the resource was owned by a religious institution or used for religious purposes during its Period of Significance.
- If Religion is selected as an Area of Significance.

Examples of Properties that MUST Meet Criteria Consideration A: Religious Properties

- *A historic church where an important non-religious event occurred, such as a speech by Patrick Henry.*
- *A historic synagogue that is significant for architecture.*
- *A private residence is the site of a meeting important to religious history.*
- *A commercial block that is currently owned as an investment property by a religious institution.*
- *A historic district in which religion was either a predominant or significant function during the period of significance.*

Example of Properties that DO NOT Need to Meet Criteria Consideration A: Religious Properties

- *A residential or commercial district that currently contains a small number of churches that are not a predominant feature of the district.*
- *A town meeting hall that serves as the center of community activity and houses a wide variety of public and private meetings, including religious service. The resource is significant for architecture and politics, and the religious function is incidental.*
- *A town hall, significant for politics from 1875 to 1925, that housed religious services during the 1950s. Since the religious function occurred after the Period of Significance, the Criteria Consideration does not apply.*

APPLYING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

ELIGIBILITY FOR HISTORIC EVENTS

A religious property can be eligible under Criterion A for any of three reasons:

- It is significant under a theme in the history of religion having secular scholarly recognition; or
- It is significant under another historical theme, such as exploration, settlement, social philanthropy, or education; or
- It is significantly associated with traditional cultural values.

RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.*

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

* For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

ELIGIBILITY FOR ARCHITECTURAL OR ARTISTIC DISTINCTION

A religious property significant for its architectural design or construction should be evaluated as are other properties under Criterion C; that is, it should be evaluated within an established architectural context and, if necessary, compared to other properties of its type, period, or method of construction. (See "Comparing Related Properties" in Part V: How to Evaluate a Property Within Its Historic Context.)

Eligible

- A historic camp meeting district that meets the requirements of Criterion C for its significance as a type of construction is eligible.

ELIGIBILITY FOR INFORMATION POTENTIAL

A religious property, whether a district, site, building, structure, or object, is eligible if it can yield important information about the religious practices of a cultural group or other historic themes. This kind of property should be evaluated as are other properties under Criterion D, in relation to similar properties, other information sources, and existing data gaps.

Eligible

- A 19th century camp meeting site that could provide information about the length and intensity of site use during revivals of the Second Great Awakening is eligible.
- Rock cairns or medicine wheels that had a historic religious mythological function and can provide information about specific cultural beliefs are eligible.

ABILITY TO REFLECT HISTORIC ASSOCIATIONS

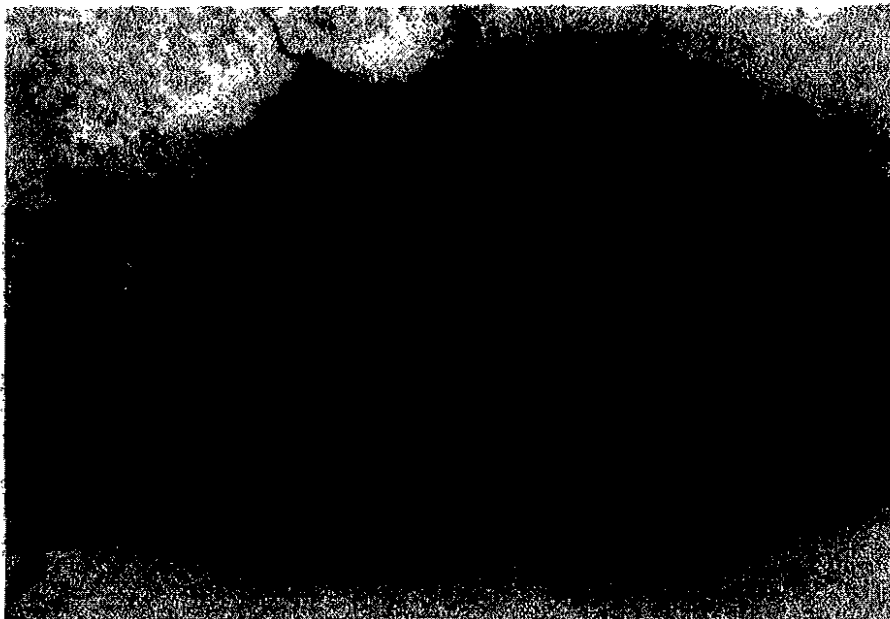
As with all eligible properties, religious properties must physically represent the period of time for which they are significant. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey the earlier history. Likewise, an older building that housed the historic activities of the congregation is eligible if it still physically represents the period of the congregation's significance. However, if an older building has been remodeled to the extent that its appearance dates from the time of the remodeling, it can only be eligible if the period of significance corresponds with the period of the alterations.

Eligible

- A church built in the 18th century and altered beyond recognition in the 19th century is eligible only if the additions are important in themselves as an example of late 19th century architecture or as a reflection of an important period of the congregation's growth.

Not Eligible

- A synagogue built in the 1920s cannot be eligible for the important activities of its congregation in the 18th and 19th centuries. It can only be eligible for significance obtained after its construction date.
- A rural 19th century frame church recently sheathed in brick is not eligible because it has lost its characteristic appearance and therefore can no longer convey its 19th century significance, either for architectural value or historic association.



Criteria Consideration A - Religious Properties. A religious property can qualify as an exception to the Criteria if it is architecturally significant. The Church of the Navitty in Rosedale, Iberville Parish, Louisiana, qualified as a rare example in the State of a 19th century small frame Gothic Revival style chapel. (Robert Obier)

CRITERIA CONSIDERATION B: MOVED PROPERTIES

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

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

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

Examples of Properties that **MUST** Meet Criteria Consideration B: Moved Properties

- A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.
- A district in which a significant number of resources have been moved from their original location.
- A district which has one moved building that makes an especially significant contribution to the district.
- A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.
- A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.

Examples of Properties that **DO NOT** Need to Meet Criteria Consideration B: Moved Properties

- A property that is moved prior to its Period of Significance.
- A district in which only a small percentage of typical buildings in a district are moved.
- A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.
- A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).
- A property that is raised or lowered on its foundations.

ELIGIBILITY FOR HISTORIC ASSOCIATIONS

A moved property significant under Criteria A or B must be demonstrated to be the surviving property most importantly associated with a particular historic event or an important aspect of a historic person's life. The phrase "most importantly associated" means that it must be the single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant.

Eligible

- A moved building occupied by an business woman during the majority of her productive career would be eligible if the other extant properties are a house she briefly inhabited prior to her period of significance and a commercial building she owned after her retirement.

Not Eligible

- A moved building associated with the beginning of rail transportation in a community is not eligible if the original railroad station and warehouse remained intact on their original sites.

SETTING AND ENVIRONMENT

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

Eligible

- A property significant as an example of mid-19th century rural house type can be eligible after a move, provided that it is placed on a lot that is sufficient in size and character to recall the basic qualities of the historic environment and setting, and provided that the building is sited appropriately in relation to natural and manmade surroundings.

Not Eligible

- A rural house that is moved into an urban area and a bridge that is no longer situated over a waterway are not eligible.

ASSOCIATION DEPENDENT ON THE SITE

For a property whose design values or historical associations are directly dependent on its location, any move will cause the property to lose its integrity and prevent it from conveying its significance.

Eligible

- A farm structure significant only as an example of a method of construction peculiar to the local area is still eligible if it is moved within that local area and the new setting is similar to that of the original location.

Not Eligible

- A 19th century rural residence that was designed around particular topographic features, reflecting that time period's ideals of environment, is not eligible if moved.

PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

CRITERIA CONSIDERATION C: BIRTHPLACES OR GRAVES

A birthplace or grave of a historical figure is eligible if the person is of outstanding importance and if there is no other appropriate site or building directly associated with his or her productive life.

UNDERSTANDING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

Birthplaces and graves often attain importance as reflections of the origins of important persons or as lasting memorials to them. The lives of persons significant in our past normally are recognized by the National Register through listing of properties illustrative of or associated with that person's productive life's work. Birthplaces and graves, as properties that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible.

Examples of Properties that MUST Meet Criteria Consideration C: Birthplaces and Graves

- *The birthplace of a significant person who lived elsewhere during his or her Period of Significance.*
- *A grave that is nominated for its association with the significant person buried in it.*
- *A grave that is nominated for information potential.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration C: Birthplaces and Graves

- *A house that was inhabited by a significant person for his or her entire lifetime.*
- *A grave located on the grounds of the house where a significant person spent his or her productive years.*

APPLYING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

PERSONS OF OUTSTANDING IMPORTANCE

The phrase "a historical figure of outstanding importance" means that in order for a birthplace or grave to qualify, it cannot be simply the birthplace or grave of a person significant in our past (Criterion B). It must be the birthplace or grave of an individual who was of outstanding importance in the history of the local area, State, or nation. The birthplace or grave of an individual who was one of several people active in some aspect of the history of a community, a state, or the Nation would not be eligible.

LAST SURVIVING PROPERTY ASSOCIATED WITH A PERSON

When an geographical area strongly associated with a person of outstanding importance has lost all other properties directly associated with his or her formative years or productive life, a birthplace or grave may be eligible.

ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of other important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, e.g., demography, pathology, mortuary practices, socioeconomic status differentiation.



Criteria Consideration C - Birthplaces. A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The Walter Reed Birthplace, Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)

CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

UNDERSTANDING CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing. Cemeteries serve as a primary means of an individual's recognition of family history and as expressions of collective religious and/or ethnic identity. Because cemeteries may embody values beyond personal or family-specific emotions, the National Register criteria allow for listing of cemeteries under certain conditions.

Examples of Properties that MUST Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated individually for Criterion A, B, or C.

Examples of Properties that DO NOT Need to Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated along with its associated church, but the church is the main resource nominated.
- A cemetery that is nominated under Criterion D for information potential.
- A cemetery that is nominated as part of a district but is not the focal point of the district.

APPLYING CRITERIA CONSIDERATION D: CEMETERIES

PERSONS OF TRANSCENDENT IMPORTANCE

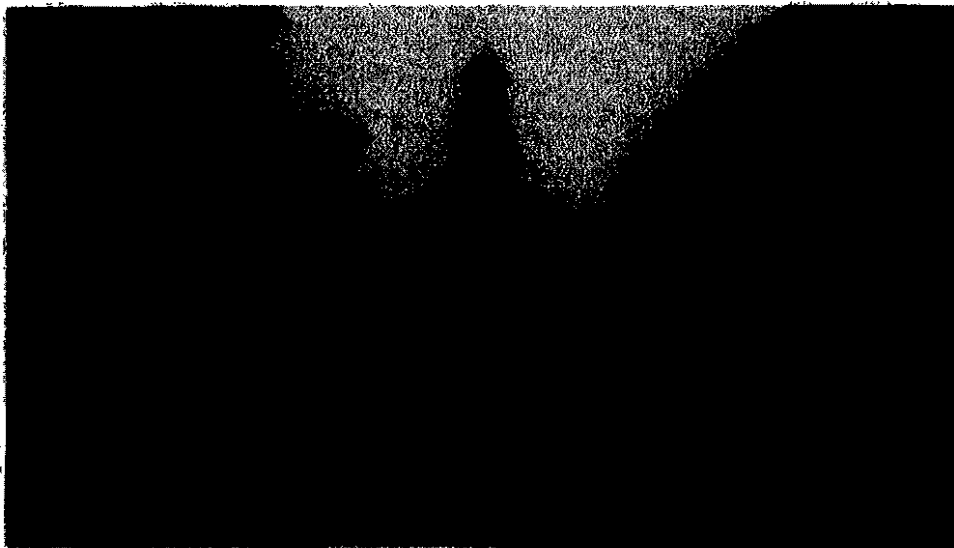
A cemetery containing the graves of persons of transcendent importance may be eligible. To be of transcendent importance the persons must have been of great eminence in their fields of endeavor or had a great impact upon the history of their community, State, or nation. (A single grave that is the burial place of an important person and is located in a larger cemetery that does not qualify under this Criteria Consideration should be treated under Criteria Consideration C: Birthplaces and Graves.)

Eligible

- A historic cemetery containing the graves of a number of persons who were exceptionally significant in determining the course of a State's political or economic history during a particular period is eligible.

Not Eligible

- A cemetery containing graves of State legislators is not eligible if they simply performed the daily business of State government and did not have an outstanding impact upon the nature and direction of the State's history.



Criteria Consideration D - Cemeteries. The Hancock Cemetery, Quincy, Norfolk County, Massachusetts meets the exception to the Criteria because it derives its primary significance from its great age (the earliest burials date from 1640) and from the distinctive design features found in its rich collection of late 17th and early 18th century funerary art. (N. Hobart Holly)

ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

INTEGRITY

Assessing the integrity of a historic cemetery entails evaluating principal design features such as plan, grave markers, and any related elements (such as fencing). Only that portion of a historic cemetery that retains its historic integrity can be eligible. If the overall integrity has been lost because of the number and size of recent grave markers, some features such as buildings, structures, or objects that retain integrity may be considered as individual properties if they are of such historic or artistic importance that they individually meet one or more of the requirements listed above.

NATIONAL CEMETERIES

National Cemeteries administered by the Veterans Administration are eligible because they have been designated by Congress as primary memorials to the military history of the United States. Those areas within a designated national cemetery that have been used or prepared for the reception of the remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout

its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present.

A national cemetery or a portion of a national cemetery that has only been set aside for use in the future is not eligible.

CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

A reconstructed property is eligible when it is accurately executed in a suitable environment *and* presented in a dignified manner as part of a restoration master plan *and* when no other building or structure with the same associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

"Reconstruction" is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- A property in which most or all of the fabric is not original.
- A district in which an important resource or a significant number of resources are reconstructions.

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- A property that is remodeled or renovated and still has the majority of its original fabric.

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase "accurately executed" means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase "suitable environment" refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager's office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager's office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager's office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

RESTORATION MASTER PLANS

Being presented "as part of a restoration master plan" means that: 1) a reconstructed property is an essential component in a historic district and 2) the reconstruction is part of an overall restoration plan for an entire district. "Restoration" is defined as accurately recovering the form and details of a property and its setting as it appeared at a particular period by removing later work or by replacing missing earlier work (as opposed to completely rebuilding the property). The master plan for the entire property must emphasize restoration, not reconstruction. In other words, the master plan for the entire resource would not be acceptable under this consideration if it called for reconstruction of a majority of the resource.

LAST SURVIVING PROPERTY OF A TYPE

This consideration also stipulates that a reconstruction can qualify if, in addition to the other requirements, no other building, object, or structure with the same association has survived. A reconstruction that is part of a restoration master plan is appropriate only if: 1) the property is the only one in the district with which a particular important activity or event has been historically associated or 2) no other property with the same associative values has survived.

RECONSTRUCTIONS OLDER THAN FIFTY YEARS

After the passage of fifty years, a reconstruction may attain its own significance for what it reveals about the period in which it was built, rather than the historic period it was intended to depict. On that basis, a reconstruction can possibly qualify under any of the Criteria.

Eligible

- A reconstructed plantation manager's office is eligible if the office were an important component of the plantation *and* if the reconstruction is one element in an overall plan for restoring the plantation *and* if no other building or structure with the same associations has survived.
- The reconstruction of the plantation manager's office building can be eligible only if the majority of buildings, structures, and objects that comprised the plantation are extant and are being restored. For guidance regarding restoration see the *Secretary of the Interior's Standards for Historic Preservation Projects*.

CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

A property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance.

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

Commemorative properties are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the event or with the person's productive life, but serve as evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation. Therefore, a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.

Examples of Properties that MUST Meet Criteria Consideration F: Commemorative Properties

- A property whose sole or primary function is commemorative or in which the commemorative function is of primary significance.

Examples of Properties that DO NOT Need to Meet Criteria Consideration F: Commemorative Properties

- A resource that has a non-commemorative primary function or significance.
- A single marker that is a component of a district (whether contributing or non-contributing).

APPLYING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

ELIGIBILITY FOR DESIGN

A commemorative property derives its design from the aesthetic values of the period of its creation. A commemorative property, therefore, may be significant for the architectural, artistic, or other design qualities of its own period in prehistory or history.

Eligible

- A commemorative statue situated in a park or square is eligible if it expresses the aesthetics or craftsmanship of the period when it was made, meeting Criterion C.
- A late 19th century statue erected on a courthouse square to commemorate Civil War veterans would qualify if it reflects that era's shared perception of the noble character and valor of the veterans and their cause. This was commonly conveyed by portraying idealized soldiers or allegorical figures of battle, victory, or sacrifice.

ELIGIBILITY FOR AGE, TRADITION, OR SYMBOLIC VALUE

A commemorative property cannot qualify for association with the event or person it memorializes. A commemorative property may, however, acquire significance after the time of its creation through *age, tradition, or symbolic value*. This significance must be documented by accepted methods of historical research, including written or oral history, and must meet one or more of the Criteria.

Eligible

- A commemorative marker erected by a cultural group that believed the place was the site of its origins is eligible if, for subsequent generations of the group, the marker itself became the focus of traditional association with the group's historic identity.
- A building erected as a monument to an important historical figure will qualify if through the passage of time the property itself has come to symbolize the value placed upon the individual and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the monument.
- A commemorative marker erected early in the settlement or development of an area will qualify if it is demonstrated that, because of its relative great age, the property has long been a part of the historic identity of the area.

Not Eligible

- A commemorative marker erected in the past by a cultural group at the site of an event in its history would not be eligible if the marker were significant only for association with the event, and it had not become significant itself through tradition.
- A building erected as a monument to an important historical figure would not be eligible if its only value lay in its association with the individual, and it has not come to symbolize values, ideas, or contributions valued by the generation that erected the monument.
- A commemorative marker erected to memorialize an event in the community's history would not qualify simply for its association with the event it memorialized.

INELIGIBILITY AS THE LAST REPRESENTATIVE OF AN EVENT OR PERSON

The loss of properties directly associated with a significant event or person does not strengthen the case for consideration of a commemorative property. Unlike birthplaces and graves, a commemorative property usually has no direct historic association. The commemorative property can qualify for historic association only if it is clearly significant in its own right, as stipulated above.

CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS⁹

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A property that is less than fifty years old.
- A property that continues to achieve significance into a period less than fifty years before the nomination.
- A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.
- A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.
- A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.
- A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.

⁹ For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years*.

APPLYING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE PAST FIFTY YEARS

ELIGIBILITY FOR EXCEPTIONAL IMPORTANCE

The phrase "exceptional importance" may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual. Properties listed that had attained significance in less than fifty years include: the launch pad at Cape Canaveral from which men first traveled to the moon, the home of nationally prominent playwright Eugene O'Neill, and the Chrysler Building (New York) significant as the epitome of the "Style Moderne" architecture.

Properties less than fifty years old that qualify as exceptional because the entire category of resources is fragile include a recent example of a traditional sailing canoe in the Trust Territory of the Pacific Islands, where because of rapid deterioration of materials, no working Micronesian canoes exist that are more than twenty years old. Properties that by their nature can last more than fifty years cannot be considered exceptionally important because of the fragility of the class of resources.

The phrase "exceptional importance" does not require that the property be of national significance. It is a measure of a property's importance within the appropriate historic context, whether the scale of that context is local, State, or national.

Eligible

- The General Laundry Building in New Orleans, one of the few remaining Art Deco Style buildings in that city, was listed in the National Register when it was forty years old because of its exceptional importance as an example of that architectural style.

HISTORICAL PERSPECTIVE

A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.

In many communities, properties such as apartment buildings built in the 1950s cannot be evaluated because there is no scholarly research available to provide an overview of the nature, role, and impact of that building type within the context of historical and architectural developments of the 1950s.

NATIONAL PARK SERVICE RUSTIC ARCHITECTURE

Properties such as structures built in a rustic style by the National Park Service during the 1930s and 1940s can be evaluated because a broad study, *National Park Service Rustic Architecture* (1977), provides the context for evaluating properties of this type and style. Specific examples were listed in the National Register prior to reaching fifty years of age when documentation concerning the individual properties established their significance within the historical and architectural context of the type and style.

VETERANS ADMINISTRATION HOSPITALS

Hospitals less than fifty years old that were constructed by the Veterans Bureau and Veterans Administration can be evaluated because the collection of forty-eight facilities built between 1920 and 1946 has been analyzed in a study prepared by the agency. The study provided a historic and architectural context for development of veteran's care within which hospitals could be evaluated. The exceptional importance of specific individual facilities constructed within the past fifty years could therefore be determined based on their role and their present integrity.

COMPARISON WITH RELATED PROPERTIES

In justifying exceptional importance, it is necessary to identify other properties within the geographical area that reflect the same significance or historic associations and to determine which properties *best* represent the historic context in question. Several properties in the area could become eligible with the passage of time, but few will qualify now as exceptionally important.

POST-WORLD WAR II PROPERTIES

Properties associated with the post-World War II era must be identified and evaluated to determine which ones in an area could be judged exceptionally important. For example, a public housing complex may be eligible as an outstanding expression of the nation's post-war urban policy. A military installation could be judged exceptionally important because of its contribution to the Cold War arms race. A church building in a Southern city may have served as the pivotal rallying point for the city's most famous civil rights protest. A post-war suburban subdivision may be the best reflection of contemporary siting and design tenets in a metropolitan area. In each case, the nomination preparer must justify the *exceptional* importance of the property relative to similar properties in the community, State, or nation.

ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

INTRODUCTION

Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.

SEVEN ASPECTS OF INTEGRITY

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

UNDERSTANDING THE ASPECTS OF INTEGRITY

LOCATION

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

DESIGN

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archeological sites.

SETTING

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just *where*, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

MATERIALS

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a

recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

WORKMANSHIP

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

FEELING

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

ASSOCIATION

Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property **needs to be compared with similar properties.** And,
- Determine, based on the significance and essential physical features, **which aspects of integrity are particularly vital** to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

CRITERIA A AND B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

CRITERION C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation

of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

CRITERION D

For properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than if they were being considered under Criteria A, B, or C. Archeological sites, in particular, do not exist today exactly as they were formed. There are always cultural and natural processes that alter the deposited materials and their spatial relationships.

For properties eligible under Criterion D, integrity is based upon the property's potential to yield specific data that addresses important research questions, such as those identified in the historic context documentation in the Statewide Comprehensive Preservation Plan or in the research design for projects meeting the *Secretary of the Interior's Standards for Archeological Documentation*.

INTERIORS

Some historic buildings are virtually defined by their exteriors, and their contribution to the built environment can be appreciated even if their interiors are not accessible. Examples of this would include early examples of steel-framed skyscraper construction. The great advance in American technology and engineering made by these buildings can be read from the outside. The change in American popular taste during the 19th century, from the symmetry and simplicity of architectural styles based on classical precedents, to the expressions of High Victorian styles, with their combination of textures, colors, and asymmetrical forms, is readily apparent from the exteriors of these buildings.

Other buildings "are" interiors. The Cleveland Arcade, that soaring 19th century glass-covered shopping area, can only be appreciated from the inside. Other buildings in this category would be the great covered train sheds of the 19th century.

In some cases the loss of an interior will disqualify properties from listing

in the National Register—a historic concert hall noted for the beauty of its auditorium and its fine acoustic qualities would be the type of property that if it were to lose its interior, it would lose its value as a historic resource. In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior.

In borderline cases particular attention is paid to the significance of the property and the remaining historic features.

HISTORIC DISTRICTS

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance or
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only* if the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*.

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context*.)

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

Not Eligible

A mid-19th century water-powered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location, Setting, Feeling, and Association**), or
- substantial amounts of new materials have been incorporated (**Materials, Workmanship, and Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design, Workmanship, and Feeling**).

CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design, Workmanship, and Feeling**), and
- most of the historic materials are present (**Materials, Workmanship, and Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting, Location, Feeling, and Association**).

Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design, Workmanship, and Feeling**) or
- considerable amounts of new materials were incorporated (**Materials, Workmanship, and Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting, Location, Feeling, and Association**).

CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials and Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material and Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

IX. SUMMARY OF THE NATIONAL HISTORIC LANDMARKS CRITERIA FOR EVALUATION

A property being nominated to the National Register may also merit consideration for potential designation as a National Historic Landmark. Such consideration is dependent upon the stringent application of the following distinct set of criteria (found in the *Code of Federal Regulations, Title 36, Part 65*).

NATIONAL HISTORIC LANDMARKS CRITERIA

The quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or

3. That represent some great idea or ideal of the American people; or
4. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
5. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
6. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

NATIONAL HISTORIC LANDMARK EXCLUSIONS

Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past fifty years are not eligible for designation. If such properties fall within the following categories they may, nevertheless, be found to qualify:

1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or
3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or

4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building, or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic con-

texts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic

district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, *per se*, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be of *major* scientific importance by revealing new cultures, or by shedding light upon periods of occupation *over large areas* of the United States. Such sites should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree*.

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

EXCLUSIONS AND EXCEPTIONS TO THE EXCLUSIONS

This section of the National Historic Landmarks Criteria has its counterpart in the National Register's "Criteria Considerations." The most abundant difference between them is the addition of the qualifiers "national," "exceptional," or "extraordinary" before the word significance. Other than this, the following are the most notable distinctions:

EXCLUSION 2

Buildings moved from their original location, qualify only if one of two conditions are met: 1) the building is nationally significant for

architecture, or 2) the persons or events with which they are associated are of *transcendent* national significance and the association is consequential.

Transcendent significance means an order of importance higher than that which would ordinarily qualify a person or event to be nationally significant. A consequential association is a relationship to a building that had an evident impact on events, rather than a connection that was incidental and passing.

EXCLUSION 3

This pertains to the site of a structure no longer standing. There is no counterpart to this exclusion in the National Register Criteria. In order for such a property to qualify for Landmark designation it must meet the second condition cited for Exclusion 2.

EXCLUSION 4

This exclusion relates to Criteria Consideration C of the National Register Criteria. The only difference is that a burial place qualifies for Landmark designation only if, in addition to other factors, the person buried is of *transcendent* national importance.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987*. (For more information about the National Historic Landmarks program, please write to Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

XI. LIST OF NATIONAL REGISTER BULLETINS

The Basics

How to Apply National Register Criteria for Evaluation *

Guidelines for Completing National Register of Historic Places Form

Part A: How to Complete the National Register Form *

Part B: How to Complete the National Register Multiple Property Documentation Form *

Researching a Historic Property *

Property Types

Guidelines for Evaluating and Documenting Historic Aids to Navigation *

Guidelines for Identifying, Evaluating and Registering America's Historic Battlefields

Guidelines for Evaluating and Registering Historical Archeological Sites

Guidelines for Evaluating and Documenting Historic Aviation Properties

Guidelines for Evaluating and Registering Cemeteries and Burial Places

How to Evaluate and Nominate Designed Historic Landscapes *

Guidelines for Identifying, Evaluating and Registering Historic Mining Sites

How to Apply National Register Criteria to Post Offices *

Guidelines for Evaluating and Documenting Properties Associated with Significant Persons

Guidelines for Evaluating and Documenting Properties That Have Achieved Significance Within the Last Fifty Years *

Guidelines for Evaluating and Documenting Rural Historic Landscapes *

Guidelines for Evaluating and Documenting Traditional Cultural Properties *

Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places

Technical Assistance

Defining Boundaries for National Register Properties*

Guidelines for Local Surveys: A Basis for Preservation Planning *

How to Improve the Quality of Photographs for National Register Nominations

National Register Casebook: Examples of Documentation *

Using the UTM Grid System to Record Historic Sites

To order these publications, write to: National Register of Historic Places, National Park Service, 1849 C St., NC 400, NW, Washington, D.C. 20240, or e-mail at: nr_reference@nps.gov. Publications marked with an asterisk (*) are also available in electronic form at www.cr.nps.gov/nr.

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

PO BOX 942898
SACRAMENTO, CA 94288-0001
(916) 863-6624 Fax: (916) 653-9824
alshpo@ohp.parks.ca.gov
www.ohp.parks.ca.gov

RECEIVED
DEC 17 2009

December 14, 2009

Kathy Marx
City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

**RE: Palo Alto Medical Clinic Nomination to the
National Register of Historic Places**

Dear Ms. Marx:

The Office of Historic Preservation (OHP) has received a nomination package to consider the above referenced property for the National Register of Historic Places (National Register). The National Register is the official list of the Nation's cultural resources worthy of recognition and preservation. The nomination identifies you as the property's owner of record.

A copy of the nomination is enclosed for your information. OHP will review the nomination for accuracy and completeness. The current nomination is a preliminary draft subject to change upon completion of the OHP review. The property will be reviewed in accordance with the eligibility criteria for the National Register program. If the nomination is complete and the property meets the National Register criteria, OHP will schedule the nomination for hearing by the State Historical Resources Commission (Commission). The Commission is a nine member body appointed by the Governor to evaluate the eligibility of properties for listing on registration programs. The Commission meets four times a year.

Please review the draft nomination. If you are opposed to the nomination, you are requested to submit a notarized letter of objection to the above address. Please see the enclosed instructions on how to support or oppose designation. If the nomination is presented to the Commission for hearing, this office will notify you of the date and location of the meeting. The meetings are open to the public and you may attend to present comments. Or, you may wish to submit written comments directly to OHP fifteen days before the Commission meeting.

Time, date, and location of scheduled Commission meetings are also posted on the OHP website at www.ohp.parks.ca.gov. Information on the National Register program is also posted on the website.

Please do not hesitate to contact the Registration Unit at (916) 653-6624 should you have further questions on the nomination or the National Register program.

Sincerely,

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov

**NATIONAL REGISTER OF HISTORIC PLACES
HOW TO SUPPORT OR OBJECT TO LISTING**

Under federal law, a privately owned property may not be listed in the National Register over the objection of its owner or, in the case of a property with multiple owners, over the objection of a majority of owners. A district may not be listed in the National Register over the objection of a majority of owners of private property within the proposed district. Each owner or partial owner of private property has one vote regardless of what part of the property that person owns. Within a district, each owner has one vote regardless of how many buildings he or she owns.

If a majority of private property owners should object, the property or district will not be listed. However, in such cases, the State Historic Preservation Officer is required to submit the nomination to the Keeper of the National Register for a *determination of eligibility* for the National Register. If the property or district is determined *eligible* for listing, although not formally listed, it will be given the same protection as a listed property in the federal environmental review process. A property determined eligible for listing is not eligible for federal tax benefits until the objections are withdrawn and the property is actually listed. The laws and regulations regarding this process are covered in the National Historic Preservation Act Amendments of 1980 and in 36 CFR (Code of Federal Regulations), Part 60.

Supporting a National Register Nomination:

Private owners who seek National Register listing for their properties are not required to submit statements of concurrence. However, letters of support, from owners or any others, are welcomed and become a permanent part of the nomination file.

Objecting to a National Register Nomination:

If you object to the listing of your property, you will need to submit a notarized statement certifying that you are the sole or partial owner of the property, as appropriate, and that you object to the listing. Owners who wish to object are encouraged to submit statements of objection prior to the meeting of the State Historical Resources Commission at which the nomination is being considered. However, statements of objection may be submitted and will be counted up until the actual date of listing. Listing usually takes place 45 days after the nomination is mailed to the Keeper of the National Register following the State Historical Resources Commission meeting.

Send letters of support or objection to:

State Historic Preservation Officer
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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February 24, 2010

Dennis Backlund
Planning Department
PO Box 10250
Palo Alto, California 94303-0862

**RE: Historic Preservation Commission Review and Comment on the Nomination of
Palo Alto Medical Clinic to the National Register of Historic Places**

Dear Mr. Backlund:

Pursuant to the Certified Local Government Agreement between the Office of Historic Preservation (OHP) and your governmental entity, we are providing your historic preservation commission with a sixty (60) day review and comment period before the State Historical Resources Commission (SHRC) takes action on the above-stated National Register of Historic Places (National Register) nomination at its next meeting. Details on the meeting are enclosed.

As a Certified Local Government under the National Historic Preservation Act of 1966, as amended, your commission may prepare a report as to whether or not such property, in its opinion, meets the criteria for the National Register. Your commission's report should be presented to the Chief Elected Local Official for transmission, along with their comments, to California State Parks, Attn: Office of Historic Preservation, Milford Wayne Donaldson, FAIA, State Historic Preservation Officer, P.O. Box 94286, Sacramento, California 94296-0001. So that the SHRC may have adequate time to consider the comments, it is requested, but not required, that OHP receives written comments fifteen (15) days before the SHRC's meeting. If you have questions or require further information, please contact the Registration Unit at (916) 653-6624.

As of January 1, 1993, all National Register properties are automatically included in the California Register of Historical Resources and afforded consideration in accordance with state and local environmental review procedures.

Supplemental information on the National Register is available at our website at the following address: www.ohp.parks.ca.gov.

Thank you for your assistance in this program.

Sincerely,

A handwritten signature in black ink that reads "Milford Wayne Donaldson".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

Enclosures: Nomination, Meeting Notice

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
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calshpo@parks.ca.gov



February 24, 2010

Kathy Marx
City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

RE: National Register of Historic Places Nomination for Palo Medical Clinic

Dear Ms. Marx:

I am pleased to inform you that the State Historical Resources Commission (SHRC) intends to consider and take action on the nomination of the above named property to the National Register of Historic Places (National Register). Details regarding the meeting are enclosed. The National Register is the United States' official list of historic properties worthy of preservation. Listing in the National Register provides recognition and assists in preserving California's heritage. Listing in the National Register assures review of federal projects that might adversely affect the character of the historic property. In addition, as of January 1, 1993, all National Register properties are now automatically listed in the California Register of Historical Resources (California Register) and afforded consideration during the State (CEQA) environmental review process. This includes properties formally determined eligible for the National Register. Listing in the National Register does not mean that the federal or state government will attach restrictive covenants to the property or try to acquire it. Public visitation rights are not required of owners. National Register listed properties may qualify for state and federal benefits. Additional information may be found at our website at www.ohp.parks.ca.gov.

You are invited to attend the SHRC meeting at which the nomination will be considered and acted upon by the SHRC. Written comments regarding the nomination may be submitted to California State Parks, Attn: Office of Historic Preservation, Milford Wayne Donaldson, FAIA, State Historic Preservation Officer, P.O. Box 94296, Sacramento, California 94296-0001. So that the SHRC may have adequate time to consider the comments, it is requested, but not required, that written comments be received by the Office of Historic Preservation fifteen (15) days in advance of the SHRC's meeting.

An electronic copy of the nomination is available in PDF format on our website at http://www.ohp.parks.ca.gov/?page_id=24368. Should you require a hard copy or have questions, please contact the Registration Unit at (916) 653-6624.

Sincerely,

A handwritten signature in black ink that reads "Milford Wayne Donaldson".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

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DEPARTMENT OF PARKS AND RECREATION

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MEETING NOTICE

FOR: State Historical Resources Commission Quarterly Meeting

DATE: April 30, 2010

TIME: 9:00 A.M.

PLACE: Historic City Hall
Historic Hearing Room
915 I Street, 2nd Floor
Sacramento, California 95814

This room is accessible to people with disabilities. Questions regarding the meeting should be directed to the Registration Unit (916) 653-6624

April 13, 2010

Milford Wayne Donaldson
State Historic Preservation Officer
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

RE: Palo Alto Medical Clinic, Roth Building, 300 Homer Avenue, Palo Alto, CA
National Register of Historic Places Nomination

Dear Mr. Donaldson,

The Palo Alto City Council, acting in the capacity of a Certified Local Government and the property owner, finds the above nominated property meets the following criteria for listing on the National Register of Historic Places as established by the National Historic Preservation Act of 1966, as amended, and recommends approval to the State Historical Resources Commission:

- 1) The property known as the Roth Building is eligible for the National Register under Criterion A at the local level for its association with persons and events important to the development of the healthcare in Palo Alto by establishing the first multi-specialty group medical practice in the community in 1932 that became a model within the healthcare industry nationwide. The organization's long-term commitment to innovative community healthcare and research laid the foundation for the progressive healthcare network that thrives in Palo Alto today; and
- 2) The building known as the Roth Building is eligible for the National Register at the local level under Criterion C as representative of the work of a master architect, Birge Clark, and artist, Victor Arnautoff, and as a resource displaying high artistic value. Constructed in the Spanish Eclectic style, the concrete structure with a terra cotta roof remains for the most part intact since constructed in 1932. Exterior frescoes created by Victor Arnautoff depicting contrasts between modern medical practices of the era and primitive medical practices are of high artistic value to the community.

Sincerely,

Patrick Burt
Mayor



HISTORIC RESOURCES BOARD MINUTES

MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26

Wednesday, March 3, 2010
REGULAR MEETING – 8:00 AM
Council Chambers
Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

NEW BUSINESS

Public Hearings

1. **300 Homer Avenue (Roth Building):** Request by the Department of Planning and Community Environment on behalf of the City of Palo Alto, for Historic Resources Board review and recommendation to the City Council authorizing staff to send a letter of support for the nomination of the Category 2 Roth Building to the National Register of Historic Places.

Beth Bunnenberg recused herself.

Steven Turner, Advance Planning Manager: Good morning, Chair Bower and HRB members. I'd like to introduce Kathy Marx, Project Planner for this project. Kathy is our CDBG Coordinator for the City, but she also has extensive experience with historic projects in other jurisdictions and she will be making the staff presentation this morning.

Chair Bower: Welcome, Kathy.

Kathy Marx, Project Planner: Thank you. Good morning, respected Chair and members of the Board. As you know, in your particular order you read the Staff recommendation first, so I want to let you know that Staff recommends the Historic Resource Board recommend to the City Council support for the nomination of the Roth Building to the National Register of Historic Places, and authorize Staff to prepare a letter of support to send from the Mayor to the State Historic Resources Commission prior to the April 30, 2010 meeting date.

With that said, I'd like to give you a brief summary of my Staff report. The first is a background portion. Staff received a letter on December 17th from the Office of Historic Preservation, and I'm going to use OHP after this time just to make it a little faster, requesting review of a National Register nomination for the category two building located at 300 Homer Avenue, and it's known locally as the Roth Building, for historic significance at the local level. The applicant was the Palo Alto History Museum, and the

application was prepared by Garvalia Architecture. The City is the property owner, and as a certified local government, the HRB is required to recommend to the City Council either opposition or approval of a National Register Nomination. A letter indicating the recommendation needs to be sent to the OHP from the chief elected local official, which would be our Mayor, prior to the schedule of the review, which I've indicated was April 30th. So, we're trying to move forward with that and we will go to Council with either your approval or lack of support for this nomination.

Two letters have been received to by City Staff after the distribution of your packets. You all had those sitting at places. Both of those letters are from the OHP. The letter addressed to Mr. Backlund regards the CLG status of the City, and as a representative of that certified local government status, that you all need to have a copy of that letter. It indicates that the HRB may prepare a report as to whether or not the property, in its opinion, meets the criteria for the National Register. In discussion with Jai Correa, and he's the Supervisor of the Registration Unit at OHP, I spoke with him about this and he said really a letter indicating the criterion for approval, if that was the decision of the HRB, is an adequate report. They really don't need a lengthy report; they already have the nomination with a lot of detail. So, if the City objects to the nomination, it is necessary to send a notarized letter of objection. So, that would be the way that would happen.

Now I'd like to just give a brief description of this project. It was a health care clinic, as far as the building was utilized as a health care clinic. It was the first group medical practice in Palo Alto, and it was designed by an architect, who is certainly not only locally familiar and has a lot of notoriety, but also nationally, and that's Birge Clark. The date of construction was 1932. The period of significance is important here; it's 1932 to 1999. That represents the building's timeframe in use as a medical clinic, so that's the timeframe we're discussing in this nomination. Alterations did occur to the actual structure; in 1947 there was an addition of two wings to the south and rear façade. There were also interior renovations to remodel and change things around slightly during all of the period of significance, and that just reflects an attempt by an operating clinic to maintain some since of modern layout necessary for that type of use. The rear façade was removed in 2003, but it retained the spine of the addition that included the central corridor, and that portion has been seismically retrofitted and it's been left unfinished pending a new use for the building.

The areas of significance that are applicable to this nomination is criterion A, and that's where property associated with events that have made a significant contribution to the broad patterns of history, so that's one thing we need to remember. And criterion C, and that's a distinctive architectural type, or method of construction, or work of a master, or possessing high artistic values. So, those are the two criterion that the nomination includes. So, it's the task of the HRB, by utilizing the methodology included in the National Register Bulletin on how to apply the National Register criteria for evaluation of a historic property to either support or refute the above criteria that I just mentioned. That bulletin is in your packet as Attachment C.

The following points are points that I gleaned from the nomination (there may be more) as highlights of this nomination. The first is it was the first multi-specialty group practice in the community, and it served as a model for health care practices nationwide. It was

highly innovative to have a multi-group practice at that time; it was quite controversial actually. It was a leader in advancing Palo Alto in health care resources, research and new technology in the practice of medicine, and consequently it really did provide a foundation for this unbelievably progressive health care network we have in Palo Alto today. The building is a work of a master architect, Birge Clark. The frescos at the entrance of the building are the work of a highly recognized artist, Victor Arnautoff, with very high artistic value in the community, and not duplicated elsewhere in the community. The building is a Spanish, eclectic style, kind of coined by Mr. Clark. The interior features, some are still intact in their entirety, some of the examination rooms, physician's offices, etc. relating to the function of a medical clinic, not all but some. So, that's certainly positive.

With that, in determining the significance of the property the HRB will look at the criteria of how to determine a register, and that includes identifying events and people, architectural design and construction methods that make the property important, and then the other aspect is determining whether that property actually maintains integrity. That's to evaluate in a larger context location, design, setting, workmanship, materials, feelings, and association. And if those elements are retained, in order to convey significance, then that's considered the goal. That concludes my Staff report. I certainly am open to any questions.

Martin Bernstein: If for some reason this building, through its processing, does not be placed on the National Register, does that put the building more at risk for any unapproved changes or demolitions?

Kathy Marx: It is a category two building already here on our register, so it has certainly an element of review associated with any change that would go forward, whether it was on the register or not. The register just basically, as you all know, gives the property, it deems it its value at a, I don't even want to say a higher level, but certainly a broader level. Also, lays a foundation for any group to move forward with changes to that structure, they can receive tax credits, there's certainly benefits to a nomination that are kind of beyond the scope of just what we all value as the historic presence of that property.

Chair Bower: Do we have an applicant presentation? I guess you're the applicant. I mean we are the applicant.

Kathy Marx: Actually, this is in the process, the applicant to the Office of Historic Preservation is the Palo Alto History Building. They brought forward the application. In this review process the City is basically the applicant, so you're correct.

Chair Bower: I think then that I'd like to hear from the public. We have one person, Steve Staiger. Will you come up? Please tell us your name when you get there.

Steve Staiger: Steve Staiger. I'm the President of the Palo Alto History Museum. The one thing I wanted to make clear and sort of answer [unintelligible] question was one of the reasons for this application is that it makes the building eligible for investment tax credits, which will help with the renovation of the building. So it's not so much that it presents negatively if we don't do it, it's a positive if we do do it. Thank you.

Chair Bower: Can I ask you a question, Steve? Of course walking by the building I notice there's a sign prominently displayed saying that it's the future home of the Palo Alto History Museum.

Steve Staiger: Yes.

Chair Bower: So there are plans to develop it for that purpose?

Steve Staiger: Yes. We are working with the architect, we're working attempting to raise the funds that the City... we have an option to lease with the City for the building, and should we, when we raise the sufficient amount of funds, presumably that will change into an option, I mean a lease, and then we will then go forward with making it Palo Alto's History Museum.

Chair Bower: Thank you. So do you have a timetable for that, even though it's not firm, when you'll move forward with the construction or reconstruction?

Steve Staiger: It's all contingent upon when we raise the funds, and it's not the greatest time of the century or the decade to try to do that, but we're working hard on that and we're over halfway there, but we're not all the way there.

Chair Bower: Thank you. I don't have any other public questions. Michael, you have a question?

Michael Makinen: The only question I have is really not a question, but when you came up with the period significance 1932 to 1999, was it any rationale you can give for that? I guess I was looking at the period of significance might be associated when the original was still intact, 1932 to 1946. The wings were added in 1947 and then removed in 2003. Just a little of your thought process when you came up with the period of significance.

Kathy Marx: I understand your question and that's a thoughtful question. The 1932 to 1999 obviously is the use of the building as a medical clinic. So, that would address one of the criterion that talks about the use. So it's not talking about the architecture, it's talking about the use and its significance to the community. Though obviously the other criterion does talk about, which is C, criterion C, does talk about the architecture. So we have kind of two separate criterion and I can't really speak on behalf of the architects that produced this nomination, but I believe they were trying to look at the significance of not just the structure but the overall use and integrity of that use to this community, and so consequently chose the broader date. Concluding 1999 was when it no longer functioned as a medical clinic and was closed.

Michael Makinen: For criterion C you have like one year of significance, 1932, rather than a continual.

Kathy Marx: No, the period of significance is 1932 to 1999; that is the period of significance.

Michael Makinen: Then I look at the second line and it says C 1932.

Kathy Marx: Oh, okay, let me take a look.

Michael Makinen: Look at the nomination form.

Chair Bower: That's Attachment B. Is that what you're looking at?

Kathy Marx: Oh, I do see what you're saying. Yes, you are correct.

Michael Makinen: I would think it would be a period of time whatever you...

Kathy Marx: Rather than a date. You have the discretion to ask for modifications to this nomination. Is that a suggestion?

Michael Makinen: That's a suggestion.

Kathy Marx: So you'd like to see 1932 to 1946 or 47?

Michael Makinen: That would be a personal suggestion, but it's up to the board.

Kathy Marx: Okay.

Roger Kohler: The present building is the 1932 building plus a portion of the 1947 addition. The two wings... if you think of the original building as being a U and then the 1947 was another U with the two bottom parts put together, one upside down from the other, then the two legs of the second addition, the '47 addition, were removed but the spine from '47 remains there as part of the building today. So you really want to include that; that's part of what's trying to be protected.

Chair Bower: Any other discussion while we're in open, before we close the hearing? I don't see any, so let's close the public hearing and then let's have a discussion by the board members. Natalie?

Natalie Loukianoff, Vice-Chair: Just addressing the comment about period of significance, I actually think we should leave it as it is. The majority of this is really focusing on the use of the building and it was used until '99 in the medical capacity. The reason it says C 1932 there is '32 actually applies to criterion C, which if that were the sole criterion would be the period of significance. But since A is use, I really think that period of significance should stay as it is. Other than that I think this nomination is good to go and we support this... I support it wholeheartedly.

Patricia DiCicco: I agree with Natalie that the application should remain unchanged. I think it should just say criterion C 1932.

???: I guess I'm just having a little confusion. It says period of significance, so is one year considered a period?

???: Yes, it is.

???: It is? Okay.

Chair Bower: It's a short period. Michael?

Michael Makinen: It's probably not going to affect anything in the end, it's just a question of how you look at this. I guess I've looked at a number of these nomination forms and they usually have some interval of years rather than just a year.

Chair Bower: Martin, any comments? I would agree with Pat and Natalie that I think we should leave this application as it's presented to us, because I think it's the entire duration of the use of the building that is the appropriate issue. Any other discussion? So, do I hear a motion?

Natalie Loukianoff, Vice-Chair(???): I motion that we recommend to the City Council to write the approval letter for support on the nomination of the category two Roth Building to the National Register of Historic Places.

Martin Bernstein: I second that motion.

Chair Bower: Okay. Do we want to discuss this further? So the motion is to approve the application as it was presented?

???: Yes.

???: I think it makes perfect sense. I've been by that building for many years. I think it's fine to leave it as is. It is a little confusing to me. Over the years we've looked at that and I don't think I've ever seen it where it said there was one year as a period of significance, but if everyone who has much more experience with these is fine with that, that's fine. So, I support the motion.

???: Kathy, I have one quick question for you. Who actually filled out the application? Did the state fill this out?

[unintelligible]

Chair Bower: I think it was fascinating reading and I learned a lot about the Palo Alto Medical Foundation, or Medical Clinic as it was then called. Esther Clark was my pediatrician; I did not realize that she was the first woman doctor and that there was a gender issue when she joined. It's pretty interesting to hear about that in this era when gender, of course, is not supposed to be considered at all. So I'm actually quite pleased that this has come up for nomination and I would wholeheartedly support this recommendation.

Martin Bernstein: The reason I supported the motion, or seconded the motion, was to also say that I think this will be a real gem and a real jewel in the City of Palo Alto to receive this recognition, and look forward to having it to serve as a real educational resource to what good architecture can do, what good thoughts can do, and what good public art can do.

Chair Bower: I second that. Also, I'm thrilled that the Palo Alto History Society is going to move in there. It's totally appropriate that a building of this significance in the community will have the community history located in it. If there is no other discussion, I would call for a vote. Any other discussion? I don't see any, so all in favor?

Motion unanimously passed.