

# Appendix D

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Cultural Resources Assessment



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November 22, 2022  
Project No: 22-13453

Claire Raybould, AICP, Senior Planner  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, California, 94612  
Submitted Via email: [Claire.Raybould@cityofpaloalto.org](mailto:Claire.Raybould@cityofpaloalto.org)

**Subject: Supplemental Cultural Resources Assessment for the 3001 El Camino Real Residential Project, Palo Alto, Santa Clara County, California, 94306**

Dear Senior Planner Raybould:

This report presents the findings of a supplemental cultural resources assessment completed in support of the 3001 El Camino Real Residential Project (project) located at 3001 and 3017 El Camino Real in the city of Palo Alto, Santa Clara County, California. The City of Palo Alto (City) retained Rincon Consultants, Inc. (Rincon) to conduct this supplemental study to support the project's compliance with the California Environmental Quality Act (CEQA). This letter report presents a CEQA impacts analysis that is prepared as a supplement to a 2017 study conducted by Rincon (discussed below), for cultural resources on the project and documents the results of the tasks performed by Rincon, specifically an updated cultural resources records search, a search of the Native American Heritage Commission's (NAHC) Sacred Land's File (SLF), and archival and background research. All work was completed in accordance with CEQA and applicable local regulations, including policies in the City of Palo Alto General Plan and the Palo Alto Municipal Code. The City of Palo Alto is the lead agency under CEQA.

## Project Site and Description

The project site is located at 3001 and 3017 El Camino Real in the City of Palo Alto, California, and encompasses assessor's parcel numbers 132-37-055, 132-37-056, and 132-38-072. Specifically, the proposed project includes portions of Section 12 of Township 06S, Range 03W on the *Palo Alto, California*, United States Geological Survey (USGS) 7.5-minute topographic quadrangle (Attachment 1: Figure 1). The 1.14-acre project site is situated along the east side of El Camino Real with access from El Camino Real, Acacia Avenue and Olive Avenue (Attachment 1: Figure 2). The project site includes two extant retail buildings; one is located at 3001 El Camino Real and the other at 3017 El Camino Real, and a surface parking lot. The project site is surrounded by commercial uses along three sides along the El Camino Real commercial corridor with residential development to the north.

The following project description has been adapted from information provided by the City on September 6, 2022. The project involves the demolition of existing structures and construction of a 129-unit residential building. Of the 126,945 total square feet, 89,992 would be used for residential purposes, specifically 129 units, 18,421 square feet would be used for parking, 6,378 square feet for residential common space, and 877 square feet for a property management office on site. The project would have a maximum height of 59 feet or five stories and a maximum depth of disturbance of 15 feet below the surface. The project would also include 0 to 10 foot setbacks to create a 12 foot sidewalk in



the front of the lot on Olive Avenue, a 10 foot setback in the rear along Acacia Avenue, a 10 foot setback on the side abutting the residential district, light and dark gray fiber cement, dark brown perforated an non-perforated metal railings, and storefront glazing.

## Methods

### Background and Archival Research

Rincon completed background and archival research in support of this assessment in September 2022. The following sources were utilized to develop an understanding of the project site and its context:

- Historical aerial photographs accessed via NETR Online
- Historical USGS topographic maps
- Department of Parks and Recreation (DPR) 523 Forms for 3001 and 3017 El Camino Real
- Rincon 2017 Cultural Resources Assessment for 3001 El Camino Real Project (Letter Report)

### California Historical Resources Information System Records Search

On October 4, 2022, Rincon received California Historical Resources Information System (CHRIS) records search results (22-0543) from the Northwest Information Center (Attachment 2). The Northwest Information Center is the official state repository for cultural resources records and reports for the county in which the proposed project falls. The purpose of the records search was to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.5-mile radius surrounding it. Rincon also reviewed the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historical Landmarks list, and the Built Environment Resources Directory (BERD), as well as its predecessor the California State Historic Property Data (HPD) File. Additionally, Rincon reviewed the Archaeological Determination of Eligibility (ADOE) list.

### Sacred Lands File Search

Rincon contacted the NAHC on October 3, 2022, to request a search of the SLF, as well as a contact list of Native Americans culturally affiliated with the project site vicinity (Attachment 3).

## Findings

### Known Cultural Resources Studies

The CHRIS records search and background research identified 19 cultural resources studies within 0.5 mile of the project site (Attachment 2). Of these studies, one built environment-only study included the project site and is described in greater detail below. Additionally, Rincon conducted a study of the project site in 2017, which is also summarized below.

#### **S-041536**

S-041536 is a Final Survey Report: Palo Alto Historical Survey Update written by Michael Corbett and Denise Bradley in 2001. The report summarizes the efforts of the Palo Alto Historical Survey conducted



between 1997 and 2000 to identify built-environment properties over 50 years of age that may be eligible for the National Register of Historic Places (NRHP), CRHR, or local listing. The survey identified and evaluated 291 properties over the age of 50 years and recommended 165 as potentially eligible and 126 as ineligible. None of the identified properties are located within or adjacent to the project site. Additionally, the survey identified 13 potentially significant historic districts, of which one (the Coastland Subdivision) is in the vicinity of the project site. The Coastland Subdivision is a residential development that was constructed in 1947 via mass production in a variation of the ranch style. The boundaries of the Coastland Subdivision are not fully defined, but it is recorded as being in the vicinity of Oregon Expressway, approximately 685 feet to the west of the project site. The study did not provide an evaluation of the district and recommended further research into its potential significance. The survey did not identify the extant buildings within the project site as potentially significant properties (Corbett and Bradley 2001).

### **Rincon 2017**

Rincon conducted a cultural resources assessment for the 3001 El Camino Real Project in 2017. The assessment included a records search, an SLF search, and an architectural history peer review. The records search identified six cultural resources within a half-mile of the project site, none of which were located within the project site. Rincon reviewed the Department of Parks and Recreation (DPR) 523 forms previously prepared by Carey & Co. for the properties at 3001 El Camino Real and 3017 El Camino Real to further consider the evaluation of the buildings as ineligible for the CRHR and local listing. 3001 El Camino Real did not appear eligible based on the CRHR and local listing criteria, while 3017 El Camino Real did not appear eligible for local listing based on local listing criteria and did not meet the age requirement for consideration under the CRHR. Rincon concluded that the previous evaluation of the buildings as ineligible for the CRHR and local listing was consistent with the historical resource analysis requirements of CEQA and the City of Palo Alto Historic Preservation Ordinance (Title 16 Palo Alto Municipal Code, Section 49) (Rincon 2017).

### **Known Cultural Resources**

The CHRIS records search and background research identified six cultural resources within 0.5 miles of the project site, all of which had been previously identified in the 2017 study (Rincon 2017). Additionally, two built-environment resources were identified within the project site, which have both been previously recommended as ineligible for the CRHR and local listing. Previously recorded resources are listed in Table 1 below. No eligible resources have been recorded within or adjacent to the project site.



**Table 1 Known Cultural Resources Within 0.5 Miles of the Project Site**

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-43-000617	CA-SCL-622	Prehistoric Site	Shell midden	1987 (Barbara Bocek, Stanford University)	Not evaluated	Outside
P-43-000634	CA-SCL-716	Prehistoric Site	Shell midden	191 (Barbara Bocek, Stanford University)	Not evaluated	Outside
P-43-000928	CA-SCL-000898H	Historic Structure and Site	Southern Pacific Railroad	2001 (Chris McMorris and Theresa Rogers, JRP Historical Consulting Services)	Recommended ineligible for NRHP and CRHR in 2001	Outside
P-43-002623	—	Historic Building	Former offices of Beckman Coulter, Inc.	2010 (Dana Supernowicz, Historic Resource Associates)	6Y: Determined ineligible for NRHP	Outside
P-43-002626	—	Prehistoric Site	El Camino Real Shell Scatter	2012 (Neal Kaptain, LSA)	Not evaluated	Outside
P-43-003704	—	Historic Building	389 Park Boulevard	2009 (Amber Grady, James Williams, PBS&J)	3CS: Appears eligible for NRHP	Outside
3001 El Camino Real	-	Historic Building	3001 El Camino Real	2016 (Carey & Co.)	Recommended ineligible for the CRHR in 2016	<b>Within</b>
3017 El Camino Real	-	Historic Building	3017 El Camino Real	2016 (Carey & Co.)	Recommended ineligible for local listing in 2016	<b>Within</b>

Source: Northwest Information Center 2022

## Background and Archival Results

Rincon completed a review of historical topographic maps, aerial imagery, and previously conducted studies which included DPR forms for the extant buildings to ascertain the development history of the project site. Historical topographic maps from 1897 to 1937 depict the project site as undeveloped with surrounding development including surface streets and structures built in a standard Spanish block layout, including El Camino Real, as well as the Southern Pacific Railroad to the north (NETR Online 2022, USGS 2022). Surrounding development continued adjacent to the project site between 1968 and 1987, including residential and commercial mixed-use developments, parking lots, and the widening of El Camino Real (NETR Online 2022, USGS 2022). A concrete commercial building was first constructed within the project site at 3001 El Camino Real in 1944 (Rincon 2017). This structure is confirmed within the project site in a 1948 aerial image. The second concrete commercial building within the project site was constructed in 1968 at 3017 El Camino Real (Rincon 2017), and the building is also present on a 1968 aerial image (NETR Online 2022). Aerial imagery from 2020 confirmed both buildings were still extant and the project site is depicted in its most recent condition along with the surrounding mixed-use residential and commercial developments.



## Pedestrian Survey

As the project site is entirely paved with no visible ground surface, an archaeological field survey was deemed unnecessary and not conducted. Further, the built environment resources within the project site have been evaluated and fieldwork was not needed.

## Sacred Land File Search

On October 18, 2022, the NAHC responded to Rincon's SLF request, stating that the results of the SLF search were negative (Attachment 3). Rincon assumes the City will conduct AB 52 consultation.

## Conclusions and Recommendations

The impact analysis included here is organized based on the cultural resources thresholds included in CEQA Guidelines Appendix G: Environmental Checklist Form:

- a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
- c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Threshold A broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, we have chosen to limit analysis under Threshold A to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold B.

## Historical Built Environment Resources

As discussed above, the project site contains two buildings which were previously recorded and evaluated for historical resources eligibility, 3001 and 3017 El Camino Real. Both buildings were recommended ineligible for the CRHR in 2013 by Carey & Co. Inc., and reaffirmed as not significant by Rincon in 2017 (Rincon 2017). The building at 3001 El Camino Real was constructed in 1944 and found ineligible for the CRHR and local designation due to a lack of historical or architectural significance. The building at 3017 El Camino Real was constructed in 1968 was found ineligible for local designation due to a lack of historical or architectural significance, and ineligible for the CRHR since it was less than 50 years of age at the time of survey and did not meet the special criteria consideration requirements for buildings of the recent past. Since this time, the building at 3017 El Camino Real has crossed the 50 year threshold; however, there is no new information to suggest the building now possesses historical or architectural significance. As such, it and the building at 3001 El Camino Real are not considered historical resources under CEQA. Additionally, one previously identified potential historic district (the Coastland Subdivision) was identified during a Historic Survey for Palo Alto in the vicinity of the project site. While the exact boundaries are not defined, the district is estimated as being 685 feet west of the project site. The survey report does not formally evaluate the potential district for historical resources eligibility at the national, state, or local level. The Coastland Subdivision includes modified ranch style



residences built *en masse* in 1947, and the buildings within the project site are commercial buildings constructed in 1944 and 1968 (Rincon 2017), they would be unlikely to be contributing elements to the district. Therefore, Rincon recommends a finding of ***no impact to historical resources*** pursuant to CEQA.

## Historical and Unique Archaeological Resources

This assessment did not identify any archaeological resources or archaeological deposits within or adjacent to the project site. Four archaeological resources (one historic-period and three prehistoric) are recorded within 0.5-miles of the project site, all of which had been previously identified in the 2017 study. Additionally, the SLF returned negative results for the presence of known Native American resources and sacred lands. Previous development of two commercial buildings and associated utilities within the project site indicates a high level of disturbance, yielding a low potential for encountering intact subsurface archaeological deposits. Rincon presents the following recommended mitigation measure for unanticipated discoveries during construction. With adherence to this measure, Rincon recommends a finding of ***less than significant impact with mitigation for archaeological resources*** under CEQA.

### Recommended Mitigation

#### *Unanticipated Discovery of Cultural Resources*

In the unlikely event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work in the immediate area should be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the find is prehistoric, then a Native American representative should also be contacted to participate in the evaluation of the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the proposed project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

## Human Remains

No human remains are known to be present within the project site. However, the discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, Rincon recommends a finding of less than significant impact to human remains under CEQA.



Should you have any questions concerning this study, please do not hesitate to contact the undersigned at (916) 306-7106 or [hblind@rinconconsultants.com](mailto:hblind@rinconconsultants.com).

Sincerely,

**Rincon Consultants, Inc.**

A handwritten signature in black ink that reads "Elaine F." in a cursive style.

Elaine Foster, MA, RPA  
Archaeologist

A handwritten signature in black ink that reads "HBlind" in a cursive style.

Heather Blind, MA, RPA  
Senior Archaeologist

A handwritten signature in black ink that reads "NICHOLE JORDAN" in all caps, using a simple, blocky font.

Nichole Jordan, MA, RPA  
Principal

### **Attachments**

- Attachment 1 Figures
- Attachment 2 Records Search Results
- Attachment 3 SLF Results





## References

Corbett, Michael, and Denise Bradley

- 2001 Final Survey Report: Palo Alto Historical Survey Update – August 1997-August 2000. Report on file with the Northwest Information Center at Sonoma State University.

National Environmental Title Research (NETR Online)

- Var. “Historic Aerials: Viewer,” Historical aerial imagery and topographical maps of 3001 and 3017 El Camino Real, Palo Alto, California and vicinity.  
<https://www.historicaerials.com/viewer> (accessed September 20, 2022).

National Park Service

- 1983 “Archaeology and Historic Preservation: Secretary of the Interior’s Standards and Guidelines.” Washington, DC. [https://www.nps.gov/history/local-law/arch\\_stnds\\_0.htm](https://www.nps.gov/history/local-law/arch_stnds_0.htm) (accessed November 22, 2022).

Rincon Consultants, Inc. (Rincon)

- 2017 Cultural Resources Assessment for 3001 El Camino Real Project, City of Palo Alto. Report on file with Rincon Consultants, Inc.

United States Geologic Service (USGS).

- Var. *Palo Alto, Calif.* 7.5-minute topographical map. TopoView [historical map database].  
<https://ngmdb.usgs.ov/topoview/viewer> (accessed September 20, 2022).

# Attachment 1

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Figures

Figure 1 Regional Location



Basemap provided by National Geographic Society, Esri and their licensors © 2022. Palo Alto Quadrangle. T06S R03W S12. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

CRFigs 1 & 2 Project Location and Site Maps  
CRFig 1 Proj Locn Map

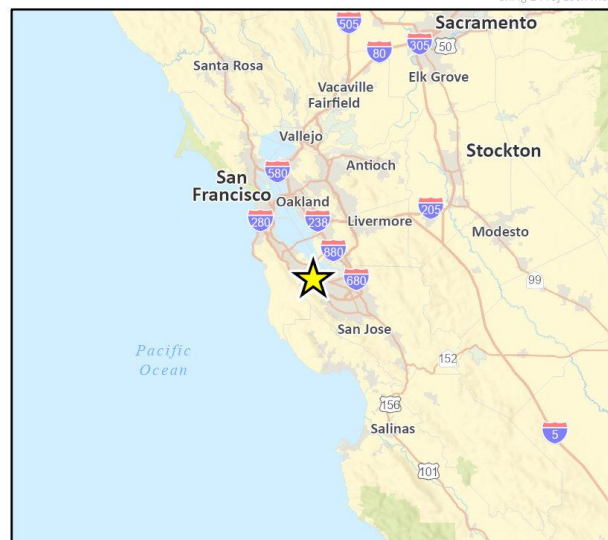
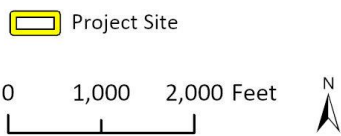


Figure 2 Project Location



Imagery provided by Microsoft Bing and its licensors © 2022.

CRFigs 1 & 2 Project Location and Site Mass  
CRFig 2 Project Site

# Attachment 2

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Records Search Results

# Attachment 3

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SLF Search Results

## NATIVE AMERICAN HERITAGE COMMISSION

October 18, 2022

Elaine Foster  
Rincon Consultants, Inc.

Via Email to: [efoster@rinconconsultants.com](mailto:efoster@rinconconsultants.com)

**Re: 3001 El Camino Real Affordable Housing Project, Santa Clara County**

Dear Ms. Foster:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: [Cody.Campagne@nahc.ca.gov](mailto:Cody.Campagne@nahc.ca.gov).

Sincerely,



Cody Campagne  
Cultural Resources Analyst

Attachment



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