

Appendix C

Cultural Resources Technical Report



Cubberley Master Plan Update Project 4000 Middlefield Road, Palo Alto, California

Cultural Resources Technical Report

prepared for

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Executive Summary

Rincon Consultants, Inc. (Rincon) was retained by City of Palo Alto to prepare the Initial Study/Mitigated Negative Declaration (IS-MND) for the Cubberley Master Plan (Master Plan). Located at 4000 Middlefield Road, Palo Alto, California, the Plan Area is currently developed with the Cubberley Community Center, a 21-building former public high school campus initially developed in 1956. The Master Plan includes the comprehensive redevelopment of the site to support a mix of community uses, including recreation and wellness facilities, performing arts venues, visual arts spaces, education and community services space, and indoor and outdoor gathering areas. The project is subject to the California Environmental Quality Act (CEQA). The City of Palo Alto is the lead agency under CEQA.

This assessment included a cultural resources records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search, a pedestrian survey of the Plan Area, and the preparation of this report to summarize the results of these activities. The background research and field survey identified one property that meets the 45 year age threshold for historical resources eligibility, the Cubberley Community Center at 4000 Middlefield Road, which was recorded individually and evaluated for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), and for inclusion in the City of Palo Alto Historic Inventory. The subject property is recommended ineligible for the NRHP, CRHR, and local designation and is not considered a historical resource pursuant to the CEQA, as a result.

Research also identified one historical resource in the vicinity of the Plan Area, the NRHP- and CRHR-listed Greenmeadow Historic District. Rincon found that, if implemented, the Master Plan would not result in a substantial adverse change to the Greenmeadow Historic District. The project would not directly alter the Greenmeadow Historic District, but would result in a minimal change to its immediate surroundings through the construction of new one- to three-story buildings. However, the proposed buildings that would be slightly taller in height than the historic district contributors, would be concentrated at the north and east ends of the Plan Area at a considerable distance from the majority of district contributors. As a result, these alterations would not be sufficient to negatively affect the setting of the historic district such that it would be materially impaired. Therefore, the proposed project would not result in a significant impact to the Greenmeadow Historic District. The redevelopment of the site, including demolition of buildings within the subject property therefore would not result in a substantial adverse change to historical resources.

The CHRIS records search, SLF search, and Native American scoping identified no archaeological resources at the Plan Area. The absence of substantial prehistoric or historic-period archaeological remains within the immediate vicinity, along with the disturbed soils not likely to contain buried A horizons, and the level of disturbance in the Project Area, suggest there is a low potential for encountering intact subsurface archaeological deposits. Rincon recommends 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.

1 Introduction

The City of Palo Alto (City) retained Rincon Consultants Inc. (Rincon) to conduct a cultural resources study for the Cubberley Master Plan Update Project (project) at 4000 Middlefield Road, Palo Alto, California. Rincon was previously prepared the Initial Study (IS) for the Cubberley Master Plan (Master Plan) in November 2019. As part of the IS, Rincon prepared a cultural resources assessment of the Plan Area (Williams et al. 2019). However, the project has since been updated to exclude approximately 7.7 acres from the southeastern portion of the Plan Area. Therefore, this technical report documents the results of the study and tasks conducted by Rincon for the updated project, specifically, a cultural resources records search, Sacred Lands File (SLF) search, and a field survey. This study has been completed pursuant to the requirements of the California Environmental Quality Act (CEQA). The City is the lead agency under CEQA.

1.1 Project Site and Description

The Plan Area is located at 4000 Middlefield Road in Palo Alto, California (Figure 1 and Figure 2). Specifically, the project encompasses portions of Sections 7-9 and 16-18 of Township 6 South, Range 2 West on the *Mountain View quadrangle, California* United States Geological Survey (USGS) 7.5-minute topographic quadrangle.

The following project description has been adapted from information provided by the City in 2025. The Cubberley Master Plan (“Master Plan”) would provide a programmatic framework for the Plan Area that envisions a combination of renovation, demolition, and new construction to support a range of community-oriented spaces and amenities for the Cubberley Community Center. The City currently owns eight acres and the City and Palo Alto Unified School District (PAUSD) signed a Memorandum of Understanding outlining the City’s intent to purchase an additional seven acres from PAUSD, contingent dependent on the passage of a voter-approved tax or bond measure in November 2026. Implementation of the Master Plan is expected to occur over time in phases and will be dependent on available funding.

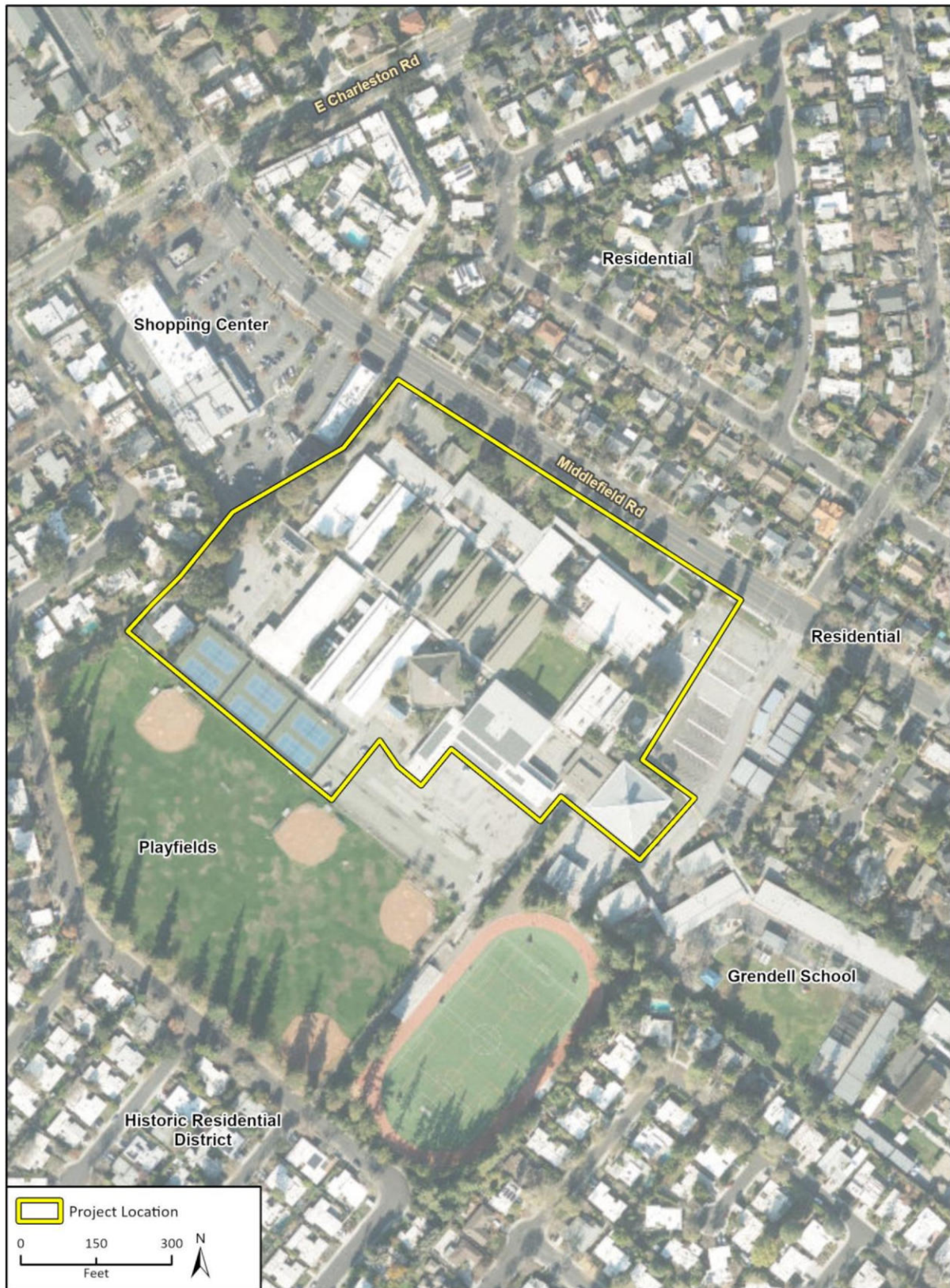
The Master Plan anticipates a comprehensive redevelopment of the site to support a mix of community uses, including recreation and wellness facilities, performing arts venues, visual arts spaces, education and community services space, and indoor and outdoor gathering areas. Outdoor uses would include plazas, outdoor event space, playgrounds, gardens, tennis courts, a pool, and an amphitheater at the center of the site. Indoor uses would include classrooms, a café, a commercial kitchen, recreation areas, visual arts spaces including makerspaces and galleries, and performing arts spaces including theaters, studios, and rehearsal halls.

Overall, the Master Plan anticipates renovation of three existing buildings totaling 39,000 square feet, demolition of 19 buildings totaling 260,000 square feet, and construction of new buildings totaling approximately 217,900 square feet. The Master Plan includes approximately 284,000 square feet of indoor space, 415,000 square feet of outdoor space, and 201,000 square feet of parking areas with 840 parking spaces.

1.2 Personnel

Rincon Senior Architectural Historian JulieAnn Murphy, MSHP, provided management oversight for this cultural resources study, performed the site visit, and is a contributing author of this report. Architectural Historian James Williams, MA, completed archival research and is a contributing author of this report. Senior Archaeologist Leanna Flaherty, Registered Professional Archaeologist (RPA), provided management oversight and reviewed the project for archaeological resources, and is a contributing author of this report. Archaeologist Pedro Gonzalez performed the cultural resources records search, assisted with Native American outreach for this project, and is a contributing author on this report. Cultural Resources Director Steven Treffers, MHP reviewed this report for quality control. All contributing authors meet the Secretary of the Interior's Professional Qualifications Standards for either history and architectural history or archaeology (National Park Service 1983).

Figure 2 Plan Area



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24-16944 EPS
Fig 2 Project Location

2 Regulatory Setting

This section includes a discussion of the applicable state and local laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during implementation of the project.

2.1 California Environmental Quality Act

California Public Resources Code (PRC) Section 21084.1 requires lead agencies determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or cultural significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR, as are California Historical Landmarks 770 and above; both are therefore historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a “unique archaeological resource” as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

The requirements for mitigation measures under CEQA are outlined in CEQA Guidelines Section 15126.4(a)(1). In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

2.1.1 National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- Criterion A:** Is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** Is associated with the lives of persons significant in our past
- Criterion C:** Embodies the distinctive characteristics of a type, period, or method of installation, 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
- Criterion D:** Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

- Location:** The place where the historic property was constructed or the place where the historic event occurred
- Design:** The combination of elements that create the form, plan, space, structure, and style of a property
- Setting:** The physical environment of a historic property
- Materials:** 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

- Workmanship:** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
- Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time
- Association:** The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

2.1.2 California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 Section 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

- Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- Criterion 2:** Is associated with the lives of persons important to our past
- Criterion 3:** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history

2.1.3 California Assembly Bill 52 of 2014

As of July 1, 2015, Assembly Bill (AB) 52 was enacted and expands CEQA by defining a new resource category, "tribal cultural resources". AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states the CEQA lead

agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and that meets at least one of the following criteria, as summarized in CEQA Guidelines Appendix G:

- 1) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)
- 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

2.2 California Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005); “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.” SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- A Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- A Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

2.3 California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner’s authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

2.4 California Public Resources Code §5097.98

Section 5097.98 of the California Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code §7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

2.5 City of Palo Alto

Municipal Code

Local landmarks in Palo Alto are listed in the Palo Alto Historic Inventory, the official list of sites, structures and districts designated by the City Council as possessing significant historical and/or architectural value. The Criteria for Designation (Municipal Code Section 16.49.020) are listed below:

- a. The structure or site is identified with the lives of historic people or with important events in the city, state or nation;
- b. The structure or is particularly representative of an architectural style or way of life important to the city, state or nation;
- c. The structure or site is an example of a type of building which was once common, but is now rare;
- d. The structure or site is connected with a business or use which was once common, but is now rare;
- e. The architect or building was important; or
- f. The structure or site contains elements demonstrating outstanding attention to architectural design, detail, materials or craftsmanship (Palo Alto Municipal Code Section 16.49.040).

Properties listed in the Palo Alto Historic Inventory are classified under the following Historic Categories:

- **Category 1.** An “Exceptional Building” of pre-eminent national or state importance. These buildings are meritorious works of the best architects, outstanding examples of a specific architectural style, or illustrate stylistic development of architecture in the United States.
- **Category 2.** A “Major Building” of regional importance. These buildings are meritorious works of the best architects, outstanding examples of an architectural style, or illustrate stylistic development of architecture in the state or region.
- **Category 3 or 4.** A “Contributing Building” is a good local example of an architectural style and relates to the character of a neighborhood grouping in scale, materials, proportion or other factors (Palo Alto Municipal Code Section 16.49.020).

City of Palo Alto Standard Conditions of Approval

The project must also adhere to the City's Standard Conditions of Approval (COAs). The applicable COAs include:

Unanticipated discovery of buried archaeological, paleontological, and tribal cultural resources.

No known archeological or paleontological resources are present on or within the immediate vicinity of the site. However, in the unlikely event that an archeological resource or paleontological resource is unearthed during ground disturbing activities, work in the immediate area must be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the find is Native American in origin, then a Native American representative must also be contacted to participate in the evaluation of the find. The qualified archaeologist, and, if applicable, the Native American representative, shall examine the find and make recommendations regarding additional work necessary to evaluate the significance of the find and the appropriate treatment of the resource. Recommendations could include, but are not limited to, invasive or non-invasive testing, sampling, laboratory analysis, preservation in place, or data recovery. A report of findings documenting any data recovered during monitoring shall be prepared by a qualified archaeologist and submitted to the Director of Planning prior to final planning inspection.

Prior to commencement of any project-related construction activities, a qualified Archaeologist hired by the applicant shall provide a worker environmental awareness training to all site personnel that addresses cultural and tribal cultural resources. The training shall discuss the appearance of resources that may be encountered during construction as well as the procedures and notification process in the event of discovery.

Discovery of human remains. Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains, and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. If the Director of Planning, in consultation with the archaeologist and Native American representative, finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted by the Director of Planning.

3 Natural and Cultural Setting

This section provides background information pertaining to the natural and cultural context of the Plan Area. It places the Plan Area within the broader natural environment which has sustained populations throughout history. This section also provides an overview of regional indigenous history, local ethnography, and post-contact history. This background information describes the distribution and type of cultural resources documented within the vicinity of the Plan Area to inform the cultural resources sensitivity assessment and the context within which resources have been evaluated.

3.1 Natural Setting

The Plan Area lies south of the San Francisco Bay at an approximate elevation of 7.3 meters (24 feet) above mean sea level. None of the surrounding area retains its natural setting, with the Plan Area located in a predominantly residential area characterized by a mix of single-family homes and apartment complexes. A small commercial center is located along the northern boundary of the Plan Area. The Plan Area is located approximately 400 feet east of Adobe Creek, historically known as San Antonio Creek, and approximately 2.6 miles south of the San Francisco Bay. Vegetation within the vicinity of the site consists of ornamental trees and shrubs consistent with urban environmental settings and has manicured landscapes.

3.2 Cultural Setting

3.2.1 Indigenous History

The Plan Area lies in the San Francisco Bay Area archaeological region (Milliken et al. 2007, Moratto 1984). Milliken et al. (2007) generally divided the pre-contact chronology of the Bay Area into five periods: The Early Holocene (8000 to 3500 before common era [BCE]), Early Period (3500 to 500 BCE), Lower Middle Period (500 BCE to CE 430 common era [CE]), the Upper Middle Period (430 to 1050 CE), and the Late Period (1050 CE to contact).

It is presumed that early Paleoindian groups lived in the area prior to 8000 BCE due to evidence in Alta California and the Channel Islands (McLaren et al. 2019). However, no evidence for this period has been discovered in the San Francisco Bay Area (Milliken et al. 2007). Sites dating to this period may be submerged or deeply buried as a result of rising sea levels and widespread sediment deposition that has occurred since the Terminal Pleistocene (Byrd et al. 2017). For this reason, the Terminal Pleistocene Period (ca. 11,700 to 8000 BCE) is not discussed here.

The earliest intensive study of archaeology of the San Francisco Bay Area began with N. C. Nelson of the University of California, Berkeley, between 1906 and 1908. Mr. Nelson documented over 400 shell mounds throughout the area. Nelson was the first to identify the Bay Area as a discrete archaeological region (Moratto 1984).

Early Holocene (8000 to 3500 BCE)

Archaeological evidence from the early Holocene is limited as sites dating to this period are likely buried under Holocene alluvial deposits (Moratto 1984, Ragir 1972). Available data suggests that the

Early Holocene in the San Francisco Bay Area is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points. Two archaeological sites (CA-CCO-696 and CA-CCO-637) dating to this period have been identified in Contra Costa County at the Los Vaqueros Reservoir. Early dates for the Early Holocene comes from the CA-CCO-696, dating to approximately 7000 BCE (Milliken et al. 2007).

Early Period (3500 to 600 BCE)

The Early Period saw increased sedentism with the introduction of new ground stone technologies (i.e., mortar and pestle) with an increase in regional trade, and the first cut shell beads. The earliest evidence for the use of the mortar and pestle in the San Francisco Bay Area dates to 3800 BCE and comes from CA-CCO-637. By 1500 BCE, mortars and pestles had almost completely replaced millingslabs and handstones, indicating a greater reliance on processing nuts, especially acorns. Faunal evidence from various sites during this period indicate a diverse faunal exploitation pattern based on the presence mussel and other shellfish, marine mammals, terrestrial mammals, and birds within sites dating to this period (D'Oro 2009).

The earliest cut bead horizon is also associated with this period. Rectangular *Haliotis* spp. (abalone) and Olivella (*Callianax biplicata*) (Vellanoweth et al. 2014) (snail) beads have been identified at several Early Period sites, including CA-CCO-637, CA-SCL-832 in Sunnyvale and CA-ALA-307 in Berkeley (Milliken et al. 2007). These early examples of cut beads were recovered from mortuary contexts.

Lower Middle Period (500 BCE to 430 CE)

The Lower Middle Period saw numerous changes from the previous period. The presence of chipped stone points and bone tools became typical. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer Olivella beads. *Haliotis* spp. ornaments, bone tools and ornaments, and basketry awls also became typical, indicating the development of coiled basketry technology. Mortars and pestles continued to be the dominant grinding tool (Luby and Gruber 1999, Milliken et al. 2007).

Evidence for the Lower Middle Period in the Bay Area comes from sites such as the Emeryville shell mound (CA-ALA-309) and Ellis Landing (CA-CCO-295). CA-ALA-309 is one of the largest shell mounds in the San Francisco Bay Area and contains multiple cultural sequences. The lower levels of the site, which date to the Middle Period, contain flexed burials with bone implements, chert bifaces, charmstones, and oyster shells (Moratto 1984).

Upper Middle Period (430 to 1050 CE)

Around 430 CE, Olivella saucer bead trade networks that had been established during earlier periods collapsed and over half of known sites occupied during the Lower Middle Period were abandoned. Olivella saucer beads were replaced with Olivella saddle beads. New types of material culture appear within these sites, including elaborate, decorative blades, fishtail charmstones, new *Haliotis* spp. ornament forms, and mica ornaments. Sea otter bones became more abundant, while salmon and other fish became less so, suggesting changes in faunal exploitation patterns from earlier periods (Milliken et al. 2007, Simons and Carpenter 2009). Excavations at CA-ALA-309 indicate that a shift from mussels to oysters, and oysters to clams may have occurred (Gifford 1916). Isotopic analysis confirms that San Francisco Bay Area individuals shifted from hunting higher trophic-level foods in the Early Period to gathering foods like plants and shellfish in the Middle and Upper periods (Burns et al. 2012). Subsistence analyses at various sites dating to this period indicate a diverse diet

that included numerous species of fish, mammals, birds, shellfish, and plant resources that varied by location in the San Francisco Bay Area (Hylkema 2002).

Late Period (1050 CE to contact)

The Late Period saw an increase in social complexity, indicated by differences in burials and an increased level of sedentism relative to preceding periods, evidenced by mortars weighing up to 90.7 kilograms (Lentz 2012: 198). An increase in imported Napa Valley obsidian occurred during this time for the production of smaller points, preforms and simple flake tools. Small, finely worked projectile points of the Stockton Serrated series associated with bow and arrow technology appear around 1250 CE. Olivella shell beads disappeared and were replaced with Olivella-lipped and spire-lopped beads in the south bay and clamshell disk beads in the north bay. Thicker and larger beads indicated higher affluence. The toggle harpoon, hopper mortar, and magnesite tube beads also appeared during this period (Milliken et al. 2007, Lentz 2012, Von Der Porten et al. 2014). As did an increase in the intensity of resource exploitation that correlates with an increase in population (Moratto 1984). Many of the well-known sites of earlier periods, such as the Emeryville shell mound (CA-ALA-309) and the West Berkeley site (CA-ALA-307), were abandoned, as indicated by the lack of Late Period elements. Researchers have suggested that the abandonment of these sites may have resulted from fluctuating climates and drought that occurred throughout the Late Period (Lightfoot and Luby 2002)

3.2.2 Ethnographic Setting

The Plan Area is located in the traditional territory of the Ohlone (or Costanoan) people. According to early ethnographers, Ohlone territory extends along the California coast from the point where the San Joaquin and Sacramento rivers merge into the San Francisco Bay to Point Sur. Their inland boundary was limited to the interior Coast Ranges. The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region (Kroeber 1925). Ethnographers divided it into eight regional dialects: Karkin, Chochenyo, Ramaytush, Awaswas, Taymen, Mutsun, Rumsen, and Chalon (Milliken et al. 2009; Jones 2015).

The pre-contact Ohlone were semi-sedentary with a settlement system characterized by base camps and seasonal reserve camps composed of tule reed houses with thatched roofs made of matted grass (Schick 1994, Skowronek 1998). Just outside base camps, large sweat houses were built into the ground near stream banks used for spiritual ceremonies and possibly hygiene (Jones 2015, Schick 1994,). Villages were divided into small polities, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities (Skowronek 1998, Kroeber 1925). Social organization appeared flexible to ethnographers, and any sort of social hierarchy was not apparent to mission priests (Skowronek 1998).

Archaeological investigations helped inform Ohlone mortuary rituals along with ethnographic evidence. Cemeteries were set away from villages and visited during the annual Mourning Anniversary (Leventhal and DiGiuseppe 2009). Ceremonial human grave offerings might include Olivella beads, as well as tools like drills, mortars, pestles, hammerstones, bone awls, and utilized flakes (Leventhal and DiGiuseppe 2009). Ohlone mythology includes animal characterization and animism, which was the basis for several creation narratives. Ritually burying animals, such as a wolf, squirrel, deer, mountain lion, gray fox, elk, badger, grizzly bear, blue goose, and bat ray, was commonly practiced. Similar to human burials, ceremonial offerings were added to ritual animal

graves like shell beads, ornaments, and exotic goods (Kroeber 1925, Field and Leventhal 2003, Jones 2010).

Ohlone food sources were based on hunting, gathering, and fishing (Kroeber 1925, Skowronek 1998). Larger animals, like bears, might be avoided, but smaller game was hunted and snared on a regular basis (Schick 1944: 17). The acorn was an important staple and was prepared by leaching acorn meal in openwork baskets and in holes dug into the sand (Kroeber 1925; Levy 1978). The Ohlone also practiced controlled burning to facilitate plant growth (Kroeber 1925, Skowronek 1998). During specific seasons or in times of drought, the reserve camps would be utilized for gathering seasonal food and accessing food storage (Schick 1994). The Ohlone fished from tule reed canoes using nets and gorge hooks (Schick 1994: 16–17). Mussels were a particularly important food resource. Sea mammals such as sea lions and seals were hunted, and beached whales were consumed (Kroeber 1925).

Seven Franciscan missions were built in Ohlone territory in the late 1700s, and all members of the Ohlone group were eventually brought into the mission system (Kroeber 1925, Skowronek 1998; Milliken et al. 2009). After the establishment of the missions, Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 by 1814 (Skowronek 1998). In 1973, the population of people with Ohlone descent was estimated at fewer than 300. The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture (Skowronek 1998). Today, the descendant communities of the Ohlone can be found in multiple tribes throughout Northern and Central California.

3.2.3 Post-Contact Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769-1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San

Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822-1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848- Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton, and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as US territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the

1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

Local History

The following historic context statement is excerpted from the *Comprehensive Plan Update Environmental Impact Report for the City of Palo Alto* (Placeworks 2016):

The Founding of Palo Alto

The history of Palo Alto is closely linked to Stanford University. The University was created in 1885 when Leland Stanford, a leading railroad baron of the day, created an endowment fund in honor of his son, who had died of typhoid the year before. Stanford built the university near the community of Mayfield, on his country estate, the Palo Alto Stock Farm. Stanford University opened its doors to students in 1891.

The City of Palo Alto was founded by Timothy Hopkins, a close friend of Leland Stanford. Hopkins purchased a large tract of land adjacent to the University and laid out a new town, which he called University Park.¹⁴ Hopkins subdivided his land into lots for sale, donating corner lots to congregations for the construction of churches. He named the streets in his new town after family and friends, including Kellogg Avenue for his wife's family and Alma Street for a family friend. Today, the strip of land along San Francisquito Creek is a park that bears his name.

University Park became Palo Alto in 1892 and the City was incorporated in 1894. Many of the early homes in Palo Alto were built by tradesmen who came to the city to work on the construction of Stanford University. These carpenters, masons, and other tradesmen used their skills to build simple houses for their families, working from published images, purchased plans, or inspiration from other homes on their block. By contrast, a number of stately homes were also built in the southwest part of town between Addison Avenue and Embarcadero Road. These were large homes on large lots built for Stanford University faculty and the district became known as Professorville. The homes in this district are notable for their shingled walls and their modestly embellished porches and doorways, with an understated, rustic elegance.

Another important factor that shaped the early urban form of the city was the interurban railway line connecting San Jose with Palo Alto and Mayfield, a neighboring community which was annexed to Palo Alto in 1925. The streetcars began operating in 1910, making it easier for faculty, staff, and students of the university to live in Palo Alto. In fact, in the early 20th century there were many renters in Palo Alto and Mayfield, including students and shop workers who lived as boarders and lodgers in single-family homes in Palo Alto and Mayfield. Even before the streetcars began operating, apartments, and boarding houses were built along the anticipated streetcar route in an early example of transit-oriented development.

The 1906 earthquake had an impact on the development of the city in two ways. First, the downtown area with its concentration of brick buildings susceptible to groundshaking was badly damaged. Particularly along University Avenue, many "soft story" buildings with unbraced post-

and-beam frames collapsed. As the city was rebuilding, there was also an influx of new residents displaced from San Francisco, Oakland, and San Mateo as a result of earthquake damage there. Housing was built in the Seale Addition and a five-block area along Hamilton and University between Middlefield and Chaucer to accommodate these new arrivals, many of who commuted by train to jobs further up the Peninsula. Palo Alto's origins as a temperance town were in evidence in new development in the Seale Addition, where restrictive covenants on properties banned alcohol while also stipulating minimum housing sale prices in an attempt to engineer neighborhood character.

Following the passage of the Statewide City Planning Act in 1915, Palo Alto was among the first cities in California to create a City Planning Commission (CPC), a citizen's advisory committee with the authority to prepare plans and maps and to make recommendations to City Council on issues related to growth, development, and beautification in the city. With the help of Charles Henry Cheney, one of the leading California planners of the day, the CPC prepared "the Permanent City Plan of Palo Alto," which called for the creation of a civic center and a zoning ordinance. In the early days of its existence, the CPC regulated building setbacks, street trees, billboards, and the design and placement of street lights, much as it does today. The CPC also ushered in some progressive ideas of the day, such as the undergrounding of utilities and requirements for landscaping.

In this period, downtown development centered around the railway station and the university was promoted by the Palo Alto Improvement Company. The Cardinal Hotel was built in 1924 and served as the anchor of an early transit-oriented development boom. The Crescent Park and Southgate Subdivisions were built in this period. With their mandatory minimum home prices and restrictive covenants prohibiting occupation by minorities, these developments represented an attempt to engineer an exclusive community. However, during these boom years when the population was growing and a great deal of high end housing was being built, there was also a concerted attempt to provide low-cost rental housing with the construction of bungalow courts - collections of single-story homes centered around a common court yard. Shortly after the Town of Mayfield was annexed to Palo Alto in 1925, a number of bungalow courts were built in the Cottage Terrace neighborhood of Mayfield.

The onset of the Great Depression brought an end to the development boom in Palo Alto, although despite the downturn, nearly 800 new buildings were constructed in the city between 1931 and 1941. The Depression changed the character of the construction as builders economized on construction costs by using less ornamentation and by leveraging economies of scale. Leland Manor is an example of a large subdivision that built 10 homes at a time by a single developer during this period. Housing construction in these years also got a boost with the passage of the Federal Housing Act of 1934, which provided government backed insurance for new housing. Even so, materials and financing were in short supply during the war years and many single-family homes in Palo Alto were subdivided into apartments to supply the demand at a time when new construction was limited. The end of the war brought another boom though, and residential construction of the post-war era was epitomized by developments like the Coastland subdivision of 1947, with mass-produced homes and entire neighborhoods built all at one time. Initially, these subdivisions were built quickly and cheaply with standard designs to satisfy the exploding demand of the post war years as young soldiers returned home and started families. By the 1950s though, innovative modern design of the Eichler subdivisions became evident in Palo Alto. Green Gables, a subdivision started in the 1930s, was completed

by Eichler with single-story homes oriented to outdoor patios and courtyards and constructed with natural materials.

Post War Palo Alto

Following World War II, Palo Alto went through its greatest expansion of the 20th century. The City expanded its boundary south to the City of Mountain View, which resulted in nearly a doubling of the land area of the city. Along with this expansion came the development of new shops catering to the daily needs of residents, including Alma Plaza and Midtown shopping center. It was this time in history when the city began to transform from a college town to a leader in the field of technology. The 1950s saw a steep increase in research, light industrial, and office space in the city.

The development of the Stanford Research Park was a significant development in the timeline of Palo Alto and the region that would eventually become known as Silicon Valley. Founded in 1951, the first tenants of the research park were the Varian Associates whose first product was the Klystron, an electronic tube capable of generating electromagnetic waves at microwave frequencies. Since then, the research park has housed a variety of accomplished scientists and entrepreneurs, as well as business consultants and intellectual property experts. Through the 1960s and 1970s, the City annexed undeveloped land, much of which was retained as open space. With the 1978 adoption of the Baylands Master Plan, the City reserved 1,700 of the 1,900 acres on the site for recreation and restoration of marshland habitat. Additionally, during this period, some existing communities were annexed, including the Barron park neighborhood in 1975.

The Stanford Shopping Center was constructed on land owned by the University in the 1950s and then expanded in 1972 as a way to increase revenues for the school. The original endowment of the land to the University prohibits the sale of any of the original 8,800 acres, and when faced with a sudden boom in enrollment after WWII following years of declining enrollment through the Depression and the War, the University turned to real estate development as a way to raise funds. Today the Stanford Shopping Center is a major regional retail center, with 1.4 million square feet of upscale, outdoor retail and commercial space. The land on which the shopping center sits is leased to the developer, Simon Property Group, which owns the buildings.

Greenmeadow

The subject property is located at the north end of the Greenmeadow neighborhood, near Palo Alto's southeast boundary. Along with the surrounding neighborhoods of Charleston Gardens, Fairmeadow, and Monta Loma, the area comprising Greenmeadow remained almost strictly agricultural until the 1950s (Netronline 1948-1956). Between 1954 and 1955, noted residential developer Joseph Eichler built Greenmeadow as a tract of more than two hundred Mid-Century Modern-style, single-family homes (EHQC 2005). The remainder of the surrounding area was mostly filled in by 1960, though several low-rise commercial and residential properties near Middlefield Road's intersections with Alma Street and San Antonio Road were not constructed until the sometime between 1960 and 1968 (Netronline 1956-1968). The area has retained the mix residential, commercial, and institutional character attained in the 1950s and 1960s.

4 Methods

This section presents the methods for each task completed during the preparation of this study.

4.1 Background and Archival Research

4.1.1 Archival Research

Rincon completed background and archival research in support of this study in February 2025. A variety of primary and secondary source materials were consulted. Sources included, but were not limited to, historical maps, aerial photographs, and written histories of the area. The following sources were utilized to develop an understanding of the Plan Area and its context:

- County of Santa Clara Assessor
- City of Palo Alto building permit abstracts
- City of Palo Alto online parcel viewer
- Ellwood P. Cubberley High School architectural plans
- Historic aerial photographs via NETRonline and the University of California, Santa Barbara (UCSB) Map & Imagery Lab
- Palo Alto Historical Society newspaper clippings files
- San Francisco Examiner and The Times (San Mateo) via Newspapers.com
- Sanborn Fire Insurance Company Maps for Palo Alto
- City Directories for Palo Alto
- Other sources as noted in the references list
- Geologic Maps via USGS National Geologic Map Database
- USDA Web Soil Survey

4.1.2 California Historical Resources Information System Records Search

On July 19, 2019, Rincon received California Historical Resources Information System (CHRIS) records search results from the Northwest Information Center (NWIC). Rincon received updated records search results on March 3, 2025, to capture additional information collected since changes were made to the Plan Area from 2019 (Appendix A). The NWIC is the official state repository for cultural resources records and reports for the county in which the 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 Plan Area and a 0.5-mile radius surrounding it. Rincon also reviewed the NRHP, the CRHR, the California Historical Landmarks list, and the Built Environment Resources Directory (BERD). Additionally, Rincon reviewed the Archaeological Determination of Eligibility (ADOE) list.

4.1.3 Sacred Lands File Search

Rincon contacted the NAHC on February 10, 2025, to request a search of the SLF, as well as a contact list of Native Americans culturally affiliated with the project area (Appendix B). On March 18, 2025, the City sent letters to 21 Native American contacts in the area to request information on potential cultural resources in the project vicinity that may be impacted by project development. Follow up calls and emails were conducted on March 21, 2025, to the Tamien Nation, March 24, 2025, to the Indian Canyon Mutsun Band of Costanoan, April 4, 2025, to The Ohlone Indian Tribe, April 5, 2025, to the Costanoan Rumsen Carmel Tribe, and May 1, 2025, to the Amah Mutsun Tribal Band of Mission San Juan Bautista.

4.2 Field Survey

Rincon Senior Architectural Historian JulieAnn Murphy conducted a pedestrian survey of the Plan Area on October 10, 2025. Pursuant to OHP Guidelines (California OHP 1995:2) Ms. Murphy conducted a built-environment survey of properties over 45 years of age, to note any changes to the property since it was last evaluated in September 2019. Age-eligible properties received an updated evaluation for listing in the CRHR and NRHP and were recorded on California Department of Parks (DPR) 523 series forms. The overall condition and integrity of these resources were documented and assessed. Site characteristics and conditions were documented using notes and digital photographs which are maintained at the Rincon Oakland office.

Because the Plan Area is developed with buildings and surface parking lots, there is little to no native ground exposure and an archaeological survey was not conducted. Under the direction of Senior Archeologist Leanna Flaherty, Ms. Murphy conducted a visual inspection of exposed ground and landscaping to evidence of archaeological materials (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historical debris (e.g., metal, glass, ceramics). Site characteristics and survey conditions were documented using field records and digital photographs.

5 Findings

5.1 Known Cultural Resources Studies

The CHRIS records search and background research identified 34 cultural resources studies within 0.5 mile of the Plan Area (Appendix A). Of these studies, one includes a portion of the Plan Area and one is immediately adjacent to the Plan Area. Known studies that occurred within or adjacent to the Plan Area are discussed in further detail below.

Study S-041536

Study S-041536 is the Palo Alto Historical Survey Update, a 2001 survey report by Michael Corbett and Denis Bradley. The Palo Alto Historical Survey Update was a large, multi-year project conducted by Dames & Moore, supported by over 100 local volunteers and the City's Planning Division Staff. Its goal was to identify, document, and evaluate properties in Palo Alto that might qualify for the NRHP. The final report of the survey compiles the project's findings and includes a Historical Overview of Palo Alto's built environment, among other key data and results gathered during the process. Though included in the survey area, no cultural resources were identified in the current Plan Area as a result of the survey (Corbert and Bradley 2001).

Study S-033061

In 2006, SWCA Environmental Consultants conducted a cultural resources inventory for a wide network of fiber-optic cables, one of which passes adjacent to the southern edge of the Plan Area. The study included a records search, a Sacred Lands File search, relocation of existing sites, and a pedestrian survey of the project area. No cultural resources were identified in the current Plan Area as a result of the survey (SWCA 2006).

5.2 Known Cultural Resources

The NWIC records search identified five previously recorded cultural resources within a 0.5-mile radius of the Plan Area. Of these resources, none are located within the Plan Area, and one resource (P-43-003139) is located in the vicinity of the Plan Area, a brief description of which can be found below. Table 1 provides a summary of the previously recorded cultural resources within the search radius.

Table 1 Known Cultural Resources

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Plan Area
P-43-000021	CA-SCL-000001	Prehistoric site	Castro-Ponce Mound	Fenenga, 1946; S. Kerr, 1980; Basin Research Associates, Inc., 1984; B. Bocek 1987; E. Zelazo, K. Luna, J. Martinez, J. Jones 2010	Not evaluated	Outside
P-43-000595	CA-SCL-000600	Prehistoric site	Cultural deposit	I. Van Zandt, R. Cartier, 1986; B. Bocek, 1991; J. Martinez 2010	Not evaluated	Outside
P-43-000669	CA-SCL-000707	Prehistoric site	Cultural deposit	Gerow, 1987; B. Bocek, 1990 J. Martinez 2010	Not evaluated	Outside
P-43-003139		Building, Structure, District	Greenmeadow (Units I and II) Historic District	M. Arbunich, 2005	Listed in the NRHP and CRHR	Vicinity
P-43-003172		Prehistoric site, historic site	Refuse scatter	E. Zelazo, K. Luna, J. Martinez, J. Jones 2010	Not evaluated	Outside

Source: NWIC March 2025

P-43-003139

P-01-003139 is an NRHP- and CRHR-listed historic district comprising a section of the Greenmeadow residential development in Palo Alto. Constructed in 1954 and 1955 by renowned builder Eichler Homes, Inc., the district consists of 243 single-family residences and a community center complex located in an area bounded generally by Charleston Street, Nelson Drive, Ben Lomond Drive, Shasta Drive, and Alma Street. Designed by architects A. Quincy Jones and Frederick Emmons, the Mid-Century Modern-style residences were available in six models sharing such features as exposed post-and-beam construction, plate glass rear or side window walls, street-facing two-car garages, one-story massing, and open floorplans. The 2.9-acre community center consists of landscaped areas, a paved parking lot, and swimming pool, in addition to a multi-purpose building and pool

service building, both designed in styles consistent with the district's residences. District contributors include 218 residences and the community center multi-purpose and pool service buildings. Due to extensive alterations, the remaining residences and the community center swimming pool are classified as non-contributors. The district is significant under NRHP Criterion C and CRHR Criterion 3 as an excellent, Mid-Century Modern-style residential development constructed by Eichler Homes. Its period of significance is 1954-1955, the years during which the district was built.

The Greenmeadow Historic District is located in the south and west vicinity of the Plan Area. Located along Nelson Drive, five residences identified as district contributors and one non-contributing residence are directly adjacent to the Plan Area's west boundary. The corresponding section of the Plan Area is developed with low-rise buildings, namely Units L and P and a portable building. Along the north and west sides of Nelson Drive, roughly between Adobe Place and Shasta Drive, there are several additional district-contributing residences situated across the street from the Plan Area. This section of the property is developed with athletic fields and lined with mature trees and a chain-link fence.

5.3 Aerial Imagery and Historical Topographic Maps Review

Rincon completed a review of historical topographic maps and aerial imagery to ascertain the history of the Plan Area. Historical topographic maps from 1915 to 1953 depict the Plan Area as largely undeveloped, consistent with the generally rural and agricultural surroundings (NETR Online 2025). Aerial imagery from 1946 to 1956 confirms the site's previously undeveloped condition, with the initial phases of suburban growth visible in the vicinity. By 1961, historical topographic maps show early suburban expansion near the site, including residential development and developing infrastructure. Available historical aerial photographs from 1965 show that the Plan Area was partially developed by that time and included several classroom buildings and the associated playing fields, tennis courts, and track (Framefinder 2025). Continued development is evident through the 1997 and 2018 maps, which depict the site as fully integrated into the urban community, surrounded by dense residential and commercial development (NETR Online 2025). Additional aeriels from 1993 to 2002 depict the site's complete transition to an urbanized area, including residential, commercial, and institutional uses (NETR Online 2021). More recent aerial imagery from 2002 to 2025 confirms the site's current condition as a fully developed urban area with no major changes in land use or structure (NETR Online 2025).

5.4 Geoarchaeological Review

Geologic mapping indicates Holocene age fossiliferous silty clay and organic clay of intra-fan areas (map unit Qac) is mapped at the surface within the majority of the Plan Area (Dibblee and Minch 2007). The northwestern edge of the Plan Area is composed of Holocene age alluvial gravel, sand, silt, and clay (map unit Qa.2), representing younger stream alluvium in fan deposits (Dibblee and Minch 2007). Holocene-age alluvium and Pleistocene-age surfaces buried by Holocene alluvium are the landforms most likely to contain buried pre-contact archaeological resources. Since human populations increased over time, Late Holocene-age soils are more likely to yield archeological resources than older, Early Holocene or Pleistocene-age soils. Also, the potential for pre-contact archaeological sites has been positively correlated with proximity to water (Meyer et al. 2010). The

Plan Area is located approximately 121.9 meters (400 feet) east of Adobe Creek, historically known as San Antonio Creek, and approximately 4.2 kilometers (2.6 miles) south of the San Francisco Bay, as shown by historical topographic maps (USGS 2025).

Soils mapping indicates the Plan Area is underlain by urban land (California Soil Web 2025). Urban land consists of highly populated and developed areas where commercial and residential development is prevalent. These soils consist of transported and altered materials where there are no native or intact soils present. Urban lands may also include artificial fill materials transported for nearby areas or previously excavated materials from the Plan Area itself. Due to these soils being transported and altered, urban land soil patterns are unique for each city, including Palo Alto (United States Department of Agriculture 2019). As these soils are highly disturbed, these soils are not likely to contain buried A horizons, which are indicative of a rapidly buried ground surface conducive to the preservation of archaeological resources.

While the Plan Area is highly disturbed and largely underlain by artificial fill, the amount of the disturbance belowground is indeterminable; as such, it is possible that relatively undisturbed sediments exist within the deeper layers of the Plan Area. As such, based on this geoarchaeological review, the likelihood of the Plan Area containing intact buried archaeological deposits is considered low to moderate.

5.5 Sacred Land File Search

On February 11, 2025, the NAHC responded to Rincon's SLF request, stating that the results of the SLF search were negative. On March 18, 2025, the City sent letters to 21 Native American contacts in the area to request information on potential cultural resources in the project vicinity that may be impacted by project development. Follow up calls and emails were sent on the following dates:

- March 21, 2025, to the Tamien Nation
- March 24, 2025, to the Indian Canyon Mutsun Band of Costanoan
- April 4, 2025, to The Ohlone Indian Tribe
- April 5, 2025, to the Costanoan Rumsen Carmel Tribe
- May 1, 2025, to the Amah Mutsun Tribal Band of Mission San Juan Bautista

On March 31, 2025, Chairwoman Quirina Geary from the Tamien Nation, responded via letter requesting tribal consultation and expected to begin consultation within the 30 days of receipt of the letter. On May 15, 2025, the City scheduled a meeting with the Tamien Nation in which they did not present themselves. Follow-up calls to Tamien Nation were unanswered. The City sent an email to the Tamien Nation on September 15, 2025, outlining their outreach efforts and requested a response to the communication by October 1, 2025, if they still wished to consult on the project. They did not respond. The City did not receive any other responses from Native American Tribes or persons. The consultation described above did not result in the identification of cultural resources in the Plan Area or its vicinity. See Appendix B for the NAHC response, including Tribal contacts list(s), and the results of the City's outreach effort.

5.6 Survey Results

The field work and background research resulted in the identification of one historic-age property in the Plan Area, the Cubberley Community Center, formerly known as the Ellwood P. Cubberley High

School. The historic-age property was recorded and evaluated for historical resources eligibility on DPR series forms, which are included in Appendix C and summarized below.

Cubberley Community Center

Physical Description

Cubberley Community Center is a 35-acre campus originally developed in 1956 as Ellwood P. Cubberley High School. The property consists of 21 permanent one- and two-story educational buildings and two portable buildings situated at the north side of the campus, near its Middlefield Road frontage (Figure 3). These buildings center on the property's original Mid-Century Modern-style buildings, which are arrayed in a finger plan, with a series of classroom wings and other instructional buildings extending south from the Cafetorium, Library, and Administration buildings. Buildings added after the school's original development are generally located along the periphery of the building complex and consist of the New Formalism-influenced Pavilion, Theatre, and I and P units, in addition to two non-original classroom wings and the aforementioned portable buildings. Most buildings are adjoined by a network of covered exterior walkways. The rear (north) side of campus is occupied by athletic fields and courts, while parking lots are located at the northeast and northwest ends of the campus.

The Cafetorium, Library, and Administration buildings are aligned parallel to Middlefield Road and make up the campus' focal point. Completed with the initial development of the campus, these buildings share a modest Mid-Century Modern architectural style and are characterized by a one-to-two-story massing, stucco cladding, low-pitched roofs, and expanses of wood-sash windows. Located at the east end of this cluster, the Cafetorium is the largest of the three buildings (Figure 4). The one-story, irregular-plan building centers on a high-ceilinged portion with a low-pitched gabled roof. Shorter flat-roof sections project from the north, south, and east elevations. All sections of the building are stucco-clad. The gabled section of the building features large banks of fixed, wood-sash windows that reach just below the broadly overhanging eaves. Windows on the flat-roof sections include ribbons of wood-and metal-sashes, including a series of clerestory windows on the east elevation. Entrances are located on the north, south, and east elevations and feature glazed wood double doors, and solid wood single doors. The north entrance is deeply recessed. Covered walkways with supported by round, metal poles trace the north and south elevations.

Located immediately west of the Cafetorium is the Library, a one-story, L-plan building with a low-pitched, single-slope roof with wide overhanging eaves (Figure 5). It features ribbons of windows on two sides: tripartite, wood sashes with a central band of hopper windows on the east and fixed, wood-sash clerestory windows on the west. A louvered metal structure shelters the east elevation windows. A single glazed wood door was observed on the east elevation. Due to limited access at the time of the field survey, no further details were recorded.

Located of west the Library is the Administration Building (Figure 6). Constructed on a T plan, the building has a flat roof with wide eaves—cantilevered on the north and supported by metal poles on the west. Its street-facing elevation is dominated by an alternating series of solid wood doors and large, fixed, wood-sash windows. A ribbon of hopper-style transom lights runs continuously above the doors and windows. A similar pattern of fenestration occurs on the rear (north) elevation, where the doors and windows face a pair of landscaped courtyards. The main public entrance faces south and features glazed double doors with a large wood sash transom above and two full-height windows to the left. Extended eaves shelter walkways on the south and west elevations.

Figure 3 Cubberley Community Center Site Map and Construction Chronology

Figure 4 Cafetorium Building, View Northwest



Figure 5 Library Building, View Northwest



Figure 6 Pathway at Administration Building (L), View South



Figure 7 Typical Classroom Wing, View West



Eleven classroom wings extend perpendicularly from the central cluster of buildings (Figure 7). They are linked by system of covered walkways and modestly landscaped courts. Most of the classroom wings (Units A through F and J through L) date from the school's original construction and share a common design. They are one story tall, rectangular in plan, one room deep, and topped with a two-tiered roof that is flat on the west and pent on the taller east side. The wood-frame buildings are clad uniformly in stucco. Each has three ribbons of windows: wood-sash hopper windows on the east elevation, bipartite wood-sashes with hopper-style transoms beneath the flat-roof eave of the west elevation, and west-facing clerestory windows just below the peak of the pent roof. Entrances generally face east and consist of wood doors with small, rectangular lights. West-elevation doors occur occasionally, however. Pent roof forms extend to the east to form walkway shelters, with round, metal supporting poles.

Exceptions to the general design of instructional buildings include the Units L, H, and V. Constructed as the Industrial Arts building, Unit L shares most of the classroom wings' design characteristics but is taller and built on a larger scale (Figure 8). The L-plan building has a low-pitched gabled roof with broad eaves. Its east elevation is punctuated with ribbons of wood-sash windows on the mezzanine and ground levels. The west elevation includes a bank of tripartite windows with central hopper sashes. Entrances are located on the east and west elevations and feature standard-size entry doors and a trio of wood swing-up garage doors. The garage doors are clustered at the ell formed by a ca.-1960 addition and include one south-facing and two east-facing doors. Units H and V differ

principally the general classroom design in that they have gabled roofs (Figure 9). Unit V is also substantially smaller than the other classroom buildings.

Situated just southeast of the classroom wings, the Gymnasium (Unit G) and Theatre (including the adjoined Unit M) flank the outdoor Amphitheater area. Irregular in plan, the Gymnasium consists of a high-ceilinged section with a gabled roof and a pair of flat-roof wings that form an ell at the building's rear (Figure 10). Like other buildings completed with the property's original development it is stucco clad. Its structural system includes wood- and steel- frame sections. A ribbon of clerestory windows—spaced by vertical steel structural elements—fills the building's gable ends, while windows on the wings are comparable to those found on the campus' original classroom buildings. Entrances are found on most elevations and include both single and double wood doors. As with most buildings on the property, covered walkways follow much of the Gymnasium's perimeter. The only visible alteration to the building is a series of solar panels supported by metal spider leg supports along the north elevation. Aerial imagery suggests there are also solar panels installed on the roof.

Original to the campus, Unit M is adjoined to the Theatre, which was completed sometime between 1968 and 1980 (Figure 11). While Unit M's design is consistent in style, materials, and scale with its 1950s counterparts, the New Formalist-influenced Theatre differs markedly the campus' original architecture. Rectangular in plan, the building rises from a canted concrete podium to culminate in a shingle-clad, pyramidal roof with a wood-clad cupola. Its tilt-up concrete construction is embellished with concrete pilasters and aggregate-finish panels. Concrete stairs approach the podium from the north and south, leading to the east-facing main elevation, which is punctuated by a central multi-pane window with flanking metal-framed commercial door and window assemblies. A flat-roof hyphen connects the Theatre to Unit M.

Many of the Theatre's design elements are also present in the Pavilion and Units I and P. The Pavilion, located just south of the Theatre, is irregular in plan, sits on a concrete foundation, and is composed of two sections: an auditorium and a lobby/service area (Figure 12). The auditorium section is housed under a shingle-clad, pyramidal roof with a pyramidal cupola. Its exterior is characterized by aggregate finish panels and reinforced concrete pilasters similar to those found on the Theatre. The lobby/service area is flat-roofed, stucco-clad, and bounded by covered walkways whose shelters are supported by squared columns that mimic the design of the building's pilasters.

Unit I is a two-story office building located between the Gymnasium and Unit J (Figure 13). Square in plan, its orientation is offset from the surrounding buildings by approximately forty-five degrees. It rises from a concrete foundation to culminate in a pyramidal roof with asphalt shingles and a wood-slat-clad monitor. Its recessed ground level is clad with aggregate-finish panels, while the upper level is stuccoed. Load-bearing square columns are spaced evenly on all four elevations. Windows are placed at even intervals and display full-height, multi-pane metal sashes on the first story. Second-story windows flank the exposed columns and include metal sashes and enamel panels filling the lower one third of the aperture. Ground-floor entrances are found throughout and feature a combination of wood and non-original metal single doors. Doors are alternately double and single and many include glazing in varied configurations. An exterior staircase with metal rails and concrete steps accesses a second-story entrance. A parking area and raised concrete planters are located immediately outside the building.

Figure 8 Unit H, View North



Figure 9 Unit V, View South



Figure 10 Gymnasium, Unit G, View West



Figure 11 Amphitheatre, Unit G (R), Unit M (L)



Figure 12 Pavilion, View Southwest



Figure 13 Building I, View Northwest



Located near the southwest corner of the building complex, Unit P is a one-story classroom building that incorporates many of the design features of the Theatre, Pavilion, and Unit I (Figure 14). The rectangular-plan building culminates in a hipped roof with asphalt shingle cladding, a wood-slat HVAC shelter, and wide eaves. Its aggregate finish wall cladding and exposed structural members are consistent in design with its counterparts. Entrances are located on all four elevations and feature glazed and solid wood doors. Windows are limited to the metal-frame transoms and sidelights accompanying the four doors on the north elevation. A covered walkway leads to Unit H (Figure 15). To its immediate west is a large, raised concrete planter.

Finally, there are two one-story portable buildings located at the southwest (Unit Q) and southeast (Unit R) corners of the building complex (Figure 16). Both are rectangular in plan with T1-11 siding. Unit Q has a flat roof and aluminum sliding windows, while Unit R features a low-pitched gabled roof and vinyl windows.

The northern half of the campus includes athletic facilities, including softball diamonds, soccer/rugby fields, clay tennis courts and a running track with metal bleachers (Figure 17). The rear (north) boundary is lined with mature trees. Landscaping elsewhere on the generally level campus includes a large lawn and mature trees at the front (south) end of the building complex and planters with shrubs and mature trees planted alongside several buildings and in the courts between classrooms.

Figure 14 Building P, View Southwest



Figure 15 Typical Walkway, View West



Figure 16 Portable Building, View Southeast



Figure 17 Playing Fields, View East



The campus' buildings are in good condition and have been subject to few visible alterations. New, commercial-style doors have been installed in a few locations and of several windows on the west elevation of Unit J have been boarded over. Overall, however, doors and windows are mostly original, and there is little evidence that exterior walls have been resurfaced. Additions were constructed on the south elevations of Units J and L and the Theatre adjoined to the east elevation of Unit M.

The overall campus plan is largely intact but was disrupted somewhat with the construction of non-original buildings starting in the 1960s. These buildings were constructed at the periphery of the

building complex, however, and did little to detract from either the original finger-plan layout or the division of the campus into a north-end building complex and south-end athletic field area

Property History

In the years following World War II, California's population grew rapidly, due to a combination of internal migration and the postwar Baby Boom. Across the state, this growth highlighted a shortage of public school classroom space (Sapphos Environmental 2014). Locally, a surging school-age population led Palo Alto Unified School District (PAUSD) officials to initiate a local school building program. Planning for the eventual Ellwood P. Cubberley High School was under way by October 1952, when the PAUSD school board won a condemnation suit over the high school's 35-acre site. Under the terms of the ruling, property owners Floyd and Alice Lowe received a payment of \$134,596 for the former farmland (Peninsula Times Tribune 10/17/1952). The board hired the architecture firm of Birge M. Clark and Walter S. Stromquist to design the campus. General contractor Howard J. White, Inc. was selected to carry out its construction. Architects' fees and projected building costs pushed the total amount of the contract to approximately \$1.75 million (Architect and Engineer 1955; Peninsula Times Tribune 10/26/1954).

Renowned as one of Palo Alto's most accomplished architects, Clark studied architecture at Stanford University in the 1910s and got his start in the field working under his father, architect and Stanford professor Arthur Clark. In 1919, following his service in World War I, Birge assisted his father in the design of the Stanford residence of future U.S. president Herbert Hoover. By the 1920s, Birge and his brother David established an independent practice based in Palo Alto, and designed residences and commercial and institutional buildings in and around Palo Alto. In the 1930s, Birge's commissions included designs for Palo Alto Children's Library at the request of local philanthropist Lucie Stern (later, Birge would also design Stern's residence). Considered some of his most respected works, Birge's designs during this period were often in variants of the Spanish Colonial Revival style. Over the course of his career, Birge was responsible for approximately 200 buildings in Palo Alto and on the Stanford University campus (PaloAltoHistory.org 2019; Palo Alto Stanford Heritage 2019).

Stromquist, an alumnus of the University of California, Berkeley, worked in the Clarks' practice as a draftsman in the 1930s, and in 1945 became a named partner beside Birge. Among Clark and Stromquist's projects were several commercial and institutional commissions, including an office building designed for the Hewlett-Packard Corporation (PCAD 2019a; Turner 2010). Besides Cubberley High School, Clark and Stromquist designed at least three other schools in the early 1950s: Benjamin Cory Elementary School and Camden High School in San Jose and Elizabeth Van Auken Elementary School (now Ohlone Elementary magnet school) (PCAD 2019a; archINFORM 2019). The firm incorporated architects David Farington Potter and Joseph Ehrlich as named partners by the 1960s. Stromquist died in 1980, while Clark passed in 1989 (PCAD 2019b, 2019c, 2019d).

As designed by Clark and Stromquist, the Cubberley, Cory, and Camden campuses were functionalistic in their architecture and organized in variants a so-called finger plan, in which rows of long, rectangular classroom buildings extend from a central point or cluster of buildings (Google Maps 2019; Cougars' Tales 2001). Common in California in the 1950s, the functionalist finger plan school was the product of experimental efforts in the 1930s to produce economically a child-centered style of school facility. Buildings were typically one or two stories and built on a "domestic" scale that designers believed would be less imposing to children than the monumental designs that characterized earlier generations of public school architecture. Care was taken with the placement

of windows, which often occurred in large expanses in order to provide optimal natural lighting and ventilation. In addition, exterior doorways and covered exterior corridors were employed to integrate indoors and outdoors spaces (Sapphos Environmental 2014).

Cubberley High School possesses many hallmarks of the functionalist finger plan campus. Designed in an unornamented Mid-Century Modern style, its original physical plant centers on the former Cafetorium, Library, and Administrative Offices, which front Middlefield Road. Covered walkways adjoin these buildings to five parallel rows of one-story classroom buildings that extend toward the rear of the complex. One room deep, the typical classroom building includes three ribbons of windows, including a clerestory series placed just below the peak of a low-pitched pent roof.

Cubberley High School opened in the fall of 1956. Aside from small additions to Units J and L, few notable changes were made to the campus until around the mid-1960s. Major expansions of the physical plant included the completion of the Pavilion between 1963 and 1968 and the Theatre and Units I and P between 1968 and 1979. The architecture firm of Clark, Stromquist, Potter & Ehrlich designed the Pavilion in 1963 (CSPE 1963). It was completed under a construction contract initially estimated at \$250,000 (Peninsula Times Tribune 8/20/1963). In 1968, Clark, Stromquist & Potter submitted designs for the other three buildings (CSP 1968). Bearing the influence of the New Formalist style, the four buildings share such design elements as reinforced concrete construction, a heavy vertical emphasis, series of pilasters, aggregate finish cladding, and hipped or pyramidal roofs with cupolas or monitors.

During the 1960s, the school was known for its student activism. In February 1969, Cubberley's Black Student Union backed a student strike for equitable treatment for African American pupils in matters related to curriculum, staffing, and discipline. After participants refused to end their walk-out, thirty-nine students were issued five-day suspensions (The Times 1969; The Catamount 1969; Macovski 1969). By at least one account, these events were part of a broader wave of student-led demonstrations that occurred at Cubberley between 1967 and 1969 (Williams 1971). The administration and faculty appeared to warm somewhat to the student body's political engagement by the early 1970s. In April 1971, the school hosted a three-day "convocation," during which students were excused from class to attend lectures by a diverse stable of speakers that included the conservative John Birch Society (who ultimately canceled their appearance) and Maoist and pacifist Stanford professor Bruce Franklin (Flynn 1971a; 1971b).

Cubberley was also the site of a notorious instructional experiment remembered as the Third Wave. In 1967, social studies instructor Ron Jones attempted to demonstrate the susceptibility of ordinary people to the appeals of fascist movements by drafting members of one of his classes into a mock political movement branded the Third Wave. Jones enticed students to pledge loyalty to him, greet fellow members with an exclusive salute, and even betray the confidence of classmates believed to be disloyal to the fictional movement. Jones was surprised by the eagerness with which many students embraced the project, and after five days concluded the exercise with a cautionary message about the risks of strident political conformity. While the Third Wave experiment was later the subject of many articles, at least two documentary films, and a theatrical play penned by Jones himself, it gained little contemporary recognition outside Cubberley and is not known to have had an important influence on social sciences pedagogy (Lee and Cockerell 2016; Aron 2017; JosephKaminski.org 2019).

Amid the Tax Revolt of the late 1970s, California voters approved Proposition 13, a 1978 ballot measure that, among other things, limited the collection of property taxes. Its measures went into effect for the 1978-1979 fiscal year and resulted in a steep decline in tax revenues across the state (Ehn 2004). Public school funding was a notable casualty of the new law, and in 1979, the PAUSD

found itself approximately \$2 million short of its projected budget. This fact, combined with more than a decade of declining PAUSD enrollments, informed the school board's decision to shutter several elementary schools and one of its three high schools. Both Cubberley and Gunn High School (opened in 1964) were under consideration for closure, but the board eventually voted 3 to 2 to close Cubberley. A lawsuit and a petition drive netting 6,000 signatures failed to reverse the board's decision, and the campus was abandoned as a public high school after the 1979-1980 academic year (PaloAltoHistory.org 2019b; Lassiter 1979). The property was soon repurposed as Cubberley Community Center, and its rooms were rented to for educational and public uses. Tenants included the United States Geological Society, California Department of Forestry, Peninsula Children's Center, Mayfield Continuation School. By 1982, rental receipts averaged around \$500,000 per year and profits about \$270,000 annually (Doyle 1982). Cubberley remained in use a community center as late as September 2019, with tenants including Children's Preschool Center, Palo Alto Humane Society, Palo Alto Junior Museum and Zoo, Palo Alto Historical Association, among others.

Historical Resources Evaluation

The subject property is a former public high school campus developed in 1956, during a post-World War II public school construction in California. During the 1960s, it was the site of several Civil Rights and anti-Vietnam War demonstrations and gained local notice for unconventional approaches pedagogy and student-faculty-administration relations. However, research conducted for the present study did not suggest the property played an important role in Palo Alto's postwar school construction boom or that it was distinctly representative of postwar public education institutional development. Nor was the school important to the history of 1960s political activism or public school instructional methods, or in the context of any other event significant to the history of the city, region, state, or nation. As a result, the subject property is recommended ineligible under Criteria A/1.

Likewise, the school does not appear to be associated with the contributions of historically significant individuals. Research did not suggest that any member of Cubberley High School's faculty or administration made notable achievements during their service at the high school. Admittedly, Jones's Third Wave experiment retains a degree of notoriety, as evidenced by continued interest in media related to the exercise more than fifty years after its conclusion. However, this notoriety outweighs any influence Jones's lessons might have had on teaching methods or in popular culture. Indeed, the Third Wave was little-known outside Palo Alto until it was publicized in a documentary decades after the events took place. And given that Jones—whether through this experiment or any other innovations in teaching—has had no documented influence on social studies instruction, the Third Wave is better regarded as cultural curiosity than as a significant event in the history of teaching. In light of this, the subject property is recommended ineligible under Criteria B/2.

The subject campus consists of buildings designed in the Mid-Century Modern and New Formalist styles and centered on a cluster of buildings arrayed in a finger plan. Neither the campus as a whole, nor any of its individual buildings, represents an exemplary application of these stylistic or formal traditions. In addition, while nearly all the campus was designed by the firm of famed Palo Alto architect Birge Clark, there is no indication the property is regarded as one of Clark's important achievements, or that it has been overlooked as such. Indeed, the campus is an unexceptional example of its type and styles, and other buildings—such as the President Hotel and the Lucie Stern Community Center—better represent the import of Clark's work in shaping Palo Alto's built environment. The subject property is therefore recommended ineligible under Criteria C/3.

A review of available evidence and records search results did not indicate that it may yield important information about prehistory or history (Criteria D/4/4). The property is also not recommended eligible as a contributor to any existing or potential historic districts.

For reasons explained above, the property is also recommended ineligible for listing in the Palo Alto Historic Inventory. It is not identified with the lives of historic people or with important events in the city, state or nation (Criterion 1); is not particularly representative of an architectural style or way of life important to the city, state or nation (Criterion 2); is not an example of a type of building which was once common, but is now rare (Criterion 3); and is not connected with a business or use which was once common, but is now rare (Criterion 4).

Local Criterion 5 allows for the designation of a building if its architect or the building itself was important. Nearly all the buildings comprising the former Cubberley High School were designed by architecture firms in which Birge Clark, an important Palo Alto-based architect, was a principal. However, as detailed above, numerous examples of Clark's work are found in Palo Alto, and research for this study did not suggest Cubberley High School should be considered exemplary of Clark's career. Additionally, research did not suggest that any other architects responsible for the school's design are regarded as important. The buildings comprising the property are also not important. Research for this study suggested that although Cubberley High School attained a degree of local fame, it was an ordinary high school and was not uniquely associated with significant historical events or persons. Following the closure of the high school, the property served as a community center and was not important in this context either. Consequently, the property does not appear eligible for designation under local Criterion 5.

Finally, the property does not possess elements demonstrating outstanding attention to architectural design, detail, materials or craftsmanship (Criterion 6).

6 Impacts Analysis and Conclusions

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 § 15064.5?
- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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.

6.1 Historical Built Environment Resources

The field survey and background research identified one historic-age built environment resource in the Project Area, the Cubberley Community Center. As detailed above, the property is recommended ineligible for listing in the NRHP, CRHR, and for the Palo Alto Historic Inventory. The property, therefore, does not qualify as a historical resource as defined by CEQA and proposed demolition or alteration would not result in any direct impacts to historical resources.

As described above, research identified one historical resource in the vicinity of the Plan Area, the NRHP- and CRHR-listed Greenmeadow Historic District. The project would not directly alter the Greenmeadow Historic District, and would result in a minimal change to its surroundings through the construction of new buildings. However, the proposed buildings would not abut the Plan Area, would be slightly taller in height than the historic district contributors, be concentrated at the north and east ends of the Plan Area at a considerable distance from the majority of district contributors. As a result, these alterations would not be sufficient to negatively affect the setting of the historic district such that it would be materially impaired. Therefore, the proposed project would not result in a significant impact to the Greenmeadow Historic District. The project would result in ***no impact to historical resources*** pursuant to CEQA.

6.2 Historical and Unique Archaeological Resources

The CHRIS records search conducted for the study did not identify any archaeological resources within the Plan Area and no archaeological resources or deposits were identified within the Plan Area as a result of the pedestrian field survey. Additionally, the results of the SLF search were negative and Native American outreach conducted for the project did not result in the identification of sensitive resources within or near the Plan Area. Moreover, the results of the geoarchaeological review indicate the likelihood of encountering buried resources is low to moderate and the Plan

Area has been previously disturbed due to construction of buildings and structures, paving of parking lots, and grading for athletic fields.

The lack of surface evidence of archaeological materials does not preclude their subsurface existence. However, the absence of substantial prehistoric or historic-period archaeological remains within the immediate vicinity, along with the disturbed soils not likely to contain buried A horizons, and the level of disturbance in the Plan Area, suggests there is a low potential for encountering intact subsurface archaeological deposits. Additionally, the project would be required to incorporate the City's COAs, which would ensure protection of archaeological, paleontological, and tribal cultural resources. With the implementation of the standard COA, impacts to unrecorded archaeological resources would be substantially mitigated by uniformly applicable development policies. With implementation of the Standard COA, Rincon recommends a finding of ***less-than-significant impact archaeological resources*** under CEQA.

6.3 Human Remains

No human remains are known to be present within the Plan Area. 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. Additionally, the City of Palo Alto's Standard Condition would be applicable, and ensure potential impacts related to the discovery of human remains unearthed during construction would be less than significant. With adherence to existing regulations and the City's COAs, Rincon recommends a finding of ***less-than-significant impact to human remains*** under CEQA.

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Appendix A

CHRIS Results

Report List

24-1202 :: Cubberley Master Plan Update IS-MND (No. 24-16944)

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-048738	Other - FRA100524B	2011	Denise Jurich and Amber Grady	California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, San Francisco to San Jose Section, Archaeological Survey Report, Technical Report [Draft]	PBS&J	38-000015, 38-004638, 38-005487, 38-005488, 41-000009, 41-000105, 41-000230, 41-000231, 41-000281, 41-000310, 41-000311, 41-000465, 41-000491, 41-000497, 41-000498, 41-000506, 41-001350, 41-001351, 41-001541, 41-001582, 41-002116, 41-002147, 41-002160, 41-002395, 41-002396, 41-002397, 41-002398, 41-002399, 41-002400, 41-002401, 41-002402, 41-002488, 41-002489, 41-002490, 41-002491, 41-002492, 41-002493, 41-002494, 41-002495, 41-002496, 41-002497, 41-002498, 41-002499, 41-002500, 41-002501, 41-002502, 41-002503, 41-002504, 41-002505, 41-002506, 41-002507, 41-002508, 41-002509, 41-002510, 41-002511, 41-002512, 41-002513, 41-002514, 41-002515, 41-002516, 41-002517, 41-002518, 41-002519, 41-002520, 41-002521, 41-002522, 41-002523, 41-002524, 41-002525, 41-002526, 41-002527, 41-002528, 41-002529, 41-002530, 41-002531, 41-002532, 41-002533, 41-002534, 41-002535, 41-002536, 41-002537, 41-002538, 41-002539, 41-002540, 41-002541, 41-002542, 41-002543, 41-002544, 41-002545, 41-002546, 41-002547, 41-002548, 41-002549, 41-002550, 41-002551, 43-000021, 43-000028, 43-000042, 43-000050, 43-000595, 43-000619, 43-000669, 43-002193, 43-003137, 43-003172, 43-003475, 43-003477, 43-003577, 43-003690, 43-003691, 43-003692, 43-003693, 43-003694, 43-003695, 43-003696, 43-003697, 43-003698, 43-003699, 43-003700, 43-003701, 43-003702, 43-003703, 43-003704, 43-003705, 43-003706, 43-003707, 43-003708, 43-003709, 43-003710, 43-003711, 43-003712, 43-003713, 43-003714, 43-003715, 43-003716, 43-003717, 43-003718, 43-003719,

Report List

24-1202 :: Cubberley Master Plan Update IS-MND (No. 24-16944)

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
S-048738a		2011	Amber Grady and Richard Brandi	California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, San Francisco to San Jose Section, Historic Architectural Survey Report, Technical Report [Draft]	PBS&J	43-003721, 43-003722
S-048738b		2019	Julianne Polanco	RE: High-Speed Rail Program, San Francisco to San Jose Project Section, Request for Review and Concurrence on Historic Architectural Survey Report	Office of Historic Preservation (OHP)	
S-053587	OTIS Report Number - FCC_2019_0614_001	2019	Shannon Loftus, Jessica Faycurry, and Jeff Stephens	Cultural Resources Review and Section 106 Compliance for the SF934 Achieve School Project, 3860 Middlefield Road, City of Palo Alto, Santa Clara County, California: No Historic Properties Affected within the Area of Potential Effects for Direct and Visual Effects (letter report)	Transcon Environmental, Inc.	
S-053587a		2019	Shannon Loftus, Jessica Faycurry, Jeff Stephens, and Kirby Page-Schmit	Collocation ("CO") Submission Packet, FCC Form 621, SF934 Achieve School, 3860 Middlefield Road, Palo Alto, California 94303	Transcon Environmental	
S-053587b		2019	Julianne Polanco	FCC_2019_0614_001, SF934 Achieve School, 3860 Middlefield Road, Palo Alto, Collocation	Office of Historic Preservation	
S-054832		2021	Ryan Brady, Sarah Brewer, and Julie Royer	Summary of Extended Phase I Investigations at 30 Locations for the Caltrain Peninsula Corridor Electrification Project, San Mateo and Santa Clara Counties, California (letter report)	Dudek	41-000009, 41-000230, 41-000231, 41-000275, 41-000498, 41-000506, 41-002116, 41-002395, 41-002396, 41-002397, 41-002399, 41-002400, 41-002402, 41-002813, 41-002814, 41-002815, 41-002816, 41-002817, 43-000042, 43-000050, 43-000595, 43-001071, 43-003137, 43-003172, 43-004192, 43-004193, 43-004194

Resource List

Cubberley Master Plan

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-43-000021	CA-SCL-000001	Resource Name - Castro-Ponce Mound; Other - Nelson's Map 356; Other - Stanford 1	Site	Prehistoric	AP09; AP15	1946 (Fenenga, [none]); 1980 (S. Kerr, [none]); 1984 ([none], Basin Research Associates, Inc.); 1987 (Barbara Bocek, Stanford University); 2010 (E,o;oe Ze;azp. Lau;a :ima Kesse <artomez. Kessoca Kpmes)	S-001784, S-004398, S-007483, S-008388, S-008389, S-008728, S-012528, S-016394, S-026045, S-048738
P-43-000595	CA-SCL-000600	Resource Name - Alma Adobe	Site	Prehistoric	AP15	1986 (Irene Van Zandt, R. Cartier, De Anza College); 1991 (Barbara Bocek, Stanford University); 2010 (Jesse Martinez, PBS&J)	S-010077, S-011396, S-012528, S-016394, S-026045, S-048738
P-43-000669	CA-SCL-000707	Resource Name - Adobe/Alma; Other - C-160	Site	Prehistoric	AP11; AP15	1987 (Gerow, [none]); 1990 (Barb Bocek, Stanford University); 2010 (Jesse Martinez, PBS&J)	S-010077, S-026045, S-029657, S-048738
P-43-003139		National Register - NPS-04-000862-9999; Resource Name - Greenmeadow (units I and II); OHP Property Number - 139384	Building, Structure, District	Historic	HP02; HP13	2005 (Mart Arbunich, Eichler Historic Quest Committee)	S-036518
P-43-003172		Resource Name - [none]	Site	Prehistoric, Historic	AH16; AP15	2010 (Emilie Zelazo, Kayla Luna, Jesse Martinez, Jessica Jones, PBS&J)	S-048738, S-048931

Appendix B

SLF Results/Native American Outreach



NATIVE AMERICAN HERITAGE COMMISSION

February 11, 2025

Leanna Flaherty
Rincon Consultants, Inc.

Via Email to: lflaherty@rinconconsultants.com

Re: Cubberley Master Plan Update IS-MND (No. 24-16944) Project, Santa Clara County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

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. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at Mathew.lin@nahc.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin, MPP
Cultural Resources Analyst

Attachment

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

ACTING EXECUTIVE
SECRETARY
STEVEN QUINN

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Native American Heritage Commission
Native American Contact List
Santa Clara County
2/11/2025

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Santa Clara	Amah Mutsun Tribal Band	N	Valentin Lopez, Chairperson	P.O. Box 5272 Galt, CA, 95632	(916) 743-5833		vjltestingcenter@aol.com	Costanoan Northern Valley Yokut	Alameda, Calaveras, Contra Costa, Fresno, Madera, Mariposa, Merced, Monterey, San Benito, San Francisco, San	7/20/2023
	Amah Mutsun Tribal Band	N	Ed Ketchum, Vice-Chairperson		(530) 578-3864		aerieways@aol.com	Costanoan Northern Valley Yokut	Alameda, Calaveras, Contra Costa, Fresno, Madera, Mariposa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	7/20/2023
	Amah Mutsun Tribal Band of Mission San Juan Bautista	N	Shelby Brown, Senior Cultural Monitor & Consultant, Councilwoman	2451 Tyrolean Way Sacramento, CA, 95821	(916) 276-8380		shelbyzimmer1997@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	10/8/2024
	Amah Mutsun Tribal Band of Mission San Juan Bautista	N	Garry Zimmer, Senior Cultural Monitor & Consultant	PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821	(408) 771-8901		garryzimmer@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	10/8/2024
	Amah Mutsun Tribal Band of Mission San Juan Bautista	N	Christopher Zimmer, Senior Cultural Monitor & Consultant, Councilman	PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821	(650) 520-8418		cdzimmer93@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	10/8/2024
	Amah Mutsun Tribal Band of Mission San Juan Bautista	N	Michelle Zimmer, Senior Cultural Monitor & Consultant	PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821	(916) 730-9468		michellezimmer1966@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	10/8/2024
	Amah Mutsun Tribal Band of Mission San Juan Bautista	N	Irenne Zwierlein, Chairperson	3030 Soda Bay Road Lakeport, CA, 95453	(916) 730-9468		amahmutsuntribalcommunications@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	10/8/2024
	Costanoan Rumsen Carmel Tribe	N	Samuel Rodriguez, Cultural Resource Officer	29539 Oakbridge Dr Menifee, CA, 92586	(760) 681-6860		crct.crd@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	7/17/2024
	Costanoan Rumsen Carmel Tribe	N	Carla Munoz, Tribal Council		(415) 690-3110		crct.crd@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	7/17/2024
	Costanoan Rumsen Carmel Tribe	N	Henry Muñoz, Cultural Resource Officer	108 South Acacia Rialto, CA, 92376	(909) 254-1610		crct.crd@gmail.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	7/17/2024
	Indian Canyon Mutsun Band of Costanoan	N	Kanyon Sayers-Roods, MLD Contact	1615 Pearson Court San Jose, CA, 95122	(408) 673-0626		kanyon@kanyonconsulting.com	Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	3/15/2024
	Indian Canyon Mutsun Band of Costanoan	N	Ann Marie Sayers, Chairperson	P.O. Box 28 Hollister, CA, 95024	(831) 637-4238			Costanoan	Alameda, Contra Costa, Merced, Monterey, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Stanislaus	3/15/2024
	Muwekma Ohlone Tribe of the SF Bay Area	N	Richard Massiatt, Councilmember/MLD Tribal Rep.	1169 S. Main Street, Ste. 336 Manteca, CA, 95377	(209) 321-0372		rmassiatt@muwekma.org	Costanoan	Alameda, Contra Costa, Marin, Merced, Napa, Sacramento, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, Stanislaus	3/28/2024
	Muwekma Ohlone Tribe of the SF Bay Area	N	Charlene Nijmeh, Chairperson	1169 S. Main Street, Ste. 336 Manteca, CA, 95377	(408) 464-2892		cnijmeh@muwekma.org	Costanoan	Alameda, Contra Costa, Marin, Merced, Napa, Sacramento, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, Stanislaus	3/28/2024

**Native American Heritage Commission
Native American Contact List
Santa Clara County
2/11/2025**

Tamien Nation	N	Lillian Camarena, Secretary	336 Percy Street Madera, CA, 93638	(559) 363-5914		Lcamarena@tamien.org	Costanoan	Alameda, San Mateo, Santa Clara, Stanislaus	4/11/2023
Tamien Nation	N	Johnathan Wasaka Costillas, THPO	10721 Pingree Road Clearlake Oaks, CA, 94523	(925) 336-5359		thpo@tamien.org	Costanoan	Alameda, San Mateo, Santa Clara, Stanislaus	4/11/2023
Tamien Nation	N	Quirina Luna Geary, Chairperson	PO Box 8053 San Jose, CA, 95155	(707) 295-4011		qgeary@tamien.org	Costanoan	Alameda, San Mateo, Santa Clara, Stanislaus	4/11/2023
The Ohlone Indian Tribe	N	Andrew Galvan, Chairperson	P.O. Box 3388 Fremont, CA, 94539	Phone: (510) 882-0527	(510) 687-9393	chochenyo@AOL.com	Bay Miwok Ohlone Patwin Plains Miwok	Alameda, Contra Costa, San Francisco, San Mateo, Santa Clara	7/24/2023
The Ohlone Indian Tribe	N	Desiree Vigil, THPO	259 Winwood Avenue Pacifica, CA, 94044	(650) 290-0245		dirwin0368@yahoo.com	Bay Miwok Ohlone Patwin Plains Miwok	Alameda, Contra Costa, San Francisco, San Mateo, Santa Clara	11/30/2023
The Ohlone Indian Tribe	N	Vincent Medina, Cultural Leader	17365 Via Del Rey San Lorenzo, CA, 94580	(510) 610-7587		vincent.d.medina@gmail.com	Bay Miwok Ohlone Patwin Plains Miwok	Alameda, Contra Costa, San Francisco, San Mateo, Santa Clara	7/24/2023
Wuksachi Indian Tribe/Eshom Valley Band	N	Kenneth Woodrow, Chairperson	1179 Rock Haven Ct. Salinas, CA, 93906	(831) 443-9702		kwood8934@aol.com	Foothill Yokut Mono	Alameda, Calaveras, Contra Costa, Fresno, Inyo, Kings, Madera, Marin, Mariposa, Merced, Mono, Monterey, San Benito, San	6/19/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Cubberley Master Plan Update IS-MND (No. 24-16944) Project, Santa Clara County.

Record: PROJ-2025-000826
Report Type: List of Tribes
Counties: Santa Clara
NAHC Group: All



KRISTEN O'KANE
COMMUNITY SERVICES
DIRECTOR

Example Correspondence Sent to all NAHC Contacts

March 18, 2025

Amah Mutsun Tribal Band of Mission San Juan Bautista
Garry Zimmer, Senior Cultural Monitor & Consultant
PO Box 214211
Sacramento, CA, 95821
Email: garryzimmer@gmail.com

**Subject: Assembly Bill 52 and Senate Bill 18 Consultation, Cubberley Master Plan Project
Palo Alto, Santa Clara County, California**

Dear Mr. Zimmer:

The City of Palo Alto is preparing an Initial Study - Mitigated Negative Declaration for the proposed Cubberley Master Plan Project. The proposed project consists of the development of community and educational spaces on a 15-acre site at 4000 Middlefield Road in Palo Alto, California. The City currently operates the site as the Cubberley Community Center, using some of the space for classes and activities in arts, culture and athletics, and sub-leasing additional space to various non-profit and community-serving groups. The City is planning to develop a Master Plan for the site to establish a vision for rebuilding and renovation of the Cubberley Community Center.

The proposed project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

The proposed project may involve an amendment to the City's 2030 Comprehensive Plan and, therefore, must also comply with Government Code § 65352.3 - 65352.4 (Senate Bill 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the Native American Heritage Commission prior to the adoption or amendment of a city or county general plan for the purpose of protecting cultural places on lands affected by the proposal.

Your tribe's input is important to the City of Palo Alto's planning process. We request that you advise us as early as possible if you wish to consult on the proposed project. Under AB 52, you have 30 days and under the provisions of SB 18, have 90 days from the date of receipt of this notice to advise the City if you are interested in further consultation. If you require any additional information or have any questions, please contact me at (650) 463-4908 or via e-mail at Kristen.O'Kane@cityofpaloalto.org. Thank you for your assistance.

Sincerely,

Kristen O'Kane
Community Services Director
City of Palo Alto



KRISTEN O'KANE
COMMUNITY SERVICES
DIRECTOR

CITY OF
**PALO
ALTO**

Attachments

Attachment 1 Project Location Map



Basemap provided by National Geographic Society, Esri and their licensors.
© 2025 Mountain View Quadrangle. T06S R02W S08, 17. 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.

 Project Location

0 1,000 2,000 Feet





Cubberley Master Plan Project Correspondence Tracking

Contact List	Date Letter Sent to Contact	Date of Response	Comments/Concerns
Amah Mutsun Tribal Band Valentin Lopez, Chairperson P.O. Box 5272 Galt, CA, 95632 Phone: (916) 743-5833 Email: vjltestingcenter@aol.com	3/18/2025	N/A	
Amah Mutsun Tribal Band Ed Ketchum, Vice-Chairperson Phone : (530) 578-3864 Email: aerieways@aol.com	3/18/2025 via email	N/A	
Amah Mutsun Tribal Band of Mission San Juan Bautista Shelby Brown, Senior Cultural Monitor & Consultant, Councilwoman 2451 Tyrolean Way Sacramento, CA, 95821 Phone: (916) 276-8380 Email: shelbyzimmer1997@gmail.com	3/18/2025; follow-up phone call on 5/1/2025	N/A	
Amah Mutsun Tribal Band of Mission San Juan Bautista Garry Zimmer, Senior Cultural Monitor & Consultant PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 Phone: (408) 771-8901 Email: garryzimmer@gmail.com	3/18/2025; follow-up phone call on 5/1/2025	N/A	
Amah Mutsun Tribal Band of Mission San Juan Bautista Christopher Zimmer, Senior Cultural Monitor & Consultant, Councilman PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 Phone: (650) 520-8418 Email: cdzimmer93@gmail.com	3/18/2025; follow-up phone call on 5/1/2025	N/A	



Contact List	Date Letter Sent to Contact	Date of Response	Comments/Concerns
Amah Mutsun Tribal Band of Mission San Juan Bautista Michelle Zimmer, Senior Cultural Monitor & Consultant PO Box 214211, 2929 Fulton Ave Unit 19 Sacramento, CA, 95821 Phone: (916) 730-9468 Email: michellezimmer1966@gmail.com	3/18/2025; follow-up phone call on 5/1/2025	N/A	
Amah Mutsun Tribal Band of Mission San Juan Bautista Irenne Zwierlein, Chairperson 3030 Soda Bay Road Lakeport, CA, 95453 Phone: (916) 730-9468 Email: amahmutsuntribalcommunications@gmail.com	3/18/2025; follow-up phone call on 5/1/2025	N/A	
Costanoan Rumsen Carmel Tribe Samuel Rodriguez, Cultural Resource Officer 29539 Oakbridge Dr Menifee, CA, 92586 Phone: (760) 681-6860 Email: crct.crd@gmail.com	3/18/2025; follow-up phone call on 4/5/2025	N/A	
Costanoan Rumsen Carmel Tribe Carla Muñoz, Tribal Council Phone: (415) 690-3110 Email: crct.crd@gmail.com	3/18/2025 via email; follow-up phone call on 4/5/2025	N/A	
Costanoan Rumsen Carmel Tribe Henry Muñoz, Cultural Resource Officer 108 South Acacia Rialto, CA, 92376 Phone: (909) 254-1610 Email: crct.crd@gmail.com	3/18/2025; follow-up phone call on 4/5/2025	N/A	
Indian Canyon Mutsun Band of Costanoan Canyon Sayers-Roods, MLD Contact 1615 Pearson Court San Jose, CA, 95122 Phone: (408) 673-0626 Email: kanyon@kanyonkonsulting.com	3/18/2025; follow-up phone call on 3/24/2025	N/A	



Contact List	Date Letter Sent to Contact	Date of Response	Comments/Concerns
Indian Canyon Mutsun Band of Costanoan Ann Marie Sayers, Chairperson P.O. Box 28 Hollister, CA, 95024 Phone: (831) 637-4238	3/18/2025; follow-up phone call on 3/24/2025	N/A	
Muwekma Ohlone Tribe of the SF Bay Area Richard Massiatt, Councilmember/MLD Tribal Rep 1169 S. Main Street, Ste. 336 Manteca, CA, 95377 Phone: (209) 321-0372 Email: rmassiatt@muwekma.org	3/18/2025; follow-up phone call on 4/4/2025	N/A	
Muwekma Ohlone Tribe of the SF Bay Area Charlene Nijmeh, Chairperson 1169 S. Main Street, Ste. 336 Manteca, CA, 95377 Phone: (408) 464-2892 Email: cnijmeh@muwekma.org	3/18/2025; follow-up phone call on 4/4/2025	N/A	
Tamien Nation Lillian Camarena, Secretary 336 Percy Street Madera, CA, 93638 Phone: (559) 363-5914 Email: Lcamarena@tamien.org	3/18/2025; follow-up phone call made on 3/21/2025	N/A	
Tamien Nation Johnathan Wasaka Costillas, THPO 10721 Pingree Road Clearlake Oaks, CA, 94523 Phone: (925) 336-5359 Email: thpo@tamien.org	3/18/2025; follow-up phone call made on 3/21/2025	N/A	
Tamien Nation Quirina Luna Geary, Chairperson PO Box 8053 San Jose, CA, 95155 Phone: (707) 295-4011 Email: qgeary@tamien.org	3/18/2025; follow-up phone call made on 3/21/2025	3/30/2025	Requested consultation on 3/30/2025. Meeting scheduled with City for 5/15/2025. Failed to appear at meeting. Follow-up calls made by the City on 5/15/2025 and 5/19/2025. Follow-up email correspondence provided on September 17, 2025 requesting response by October 1, 2025 if they wished to continue consultation. No response was received and consultation was closed.



Contact List	Date Letter Sent to Contact	Date of Response	Comments/Concerns
The Ohlone Indian Tribe Andrew Galvan, Chairperson P.O. Box 3388 Fremont, CA, 94539 Phone: (510) 882-0527 Fax: (510) 687-9393 Email: chochenyo@AOL.com	3/18/2025; follow-up phone call on 4/4/2025	N/A	
The Ohlone Indian Tribe Desiree Vigil, THPO 259 Winwood Avenue Pacifica, CA, 94044 Phone: (650) 290-0245 Email: dirwin0368@yahoo.com	3/18/2025; follow-up phone call on 4/4/2025	N/A	
The Ohlone Indian Tribe Vincent Medina, Cultural Leader 17365 Via Del Rey San Lorenzo, CA, 94580 Phone: (510) 610-7587 Email: vincent.d.medina@gmail.com	3/18/2025; follow-up phone call on 4/4/2025	N/A	
Wuksachi Indian Tribe/Eshom Valley Band Kenneth Woodrow, Chairperson 1179 Rock Haven Ct. Salinas, CA, 93906 Phone: (831) 443-9702 Email: kwood8934@aol.com	3/18/2025	N/A	

Appendix C

DPR Forms

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code

Reviewer

Date

Page 1 of 12

*Resource Name or #: Cubberley Community Center

P1. Other Identifier:

*P2. Location: ☐ Not for Publication ☒ Unrestricted *a. County: Santa Clara
*b. USGS 7.5' Quad: Mountain View Date: 2015 Township 6S, Range 2W, Sections 8 and 17 M.D.B.M.
c. Address: 4000 Middlefield Road City: Palo Alto Zip: 94303
d. UTM: Zone: mE/ mN (G.P.S.)
e. Other Locational Data: APNs: 14708052 and the west section of 14708053

***P3a. Description:**

The subject property is Cubberley Community Center, a 35-acre campus originally developed in 1956 as Ellwood P. Cubberley High School. The property consists of 21 permanent one- and two-story educational buildings and two portable buildings situated at the north side of the campus, near its Middlefield Road frontage. These buildings center on the property's original Mid-Century Modern-style buildings, which are arrayed in a finger plan, with a series of classroom wings and other instructional buildings extending south from the Cafetorium, Library, and Administration buildings. Buildings added after the school's original development are generally located along the periphery of the building complex and consist of the New Formalism-influenced Pavilion, Theatre, and I and P units, in addition to two non-original classroom wings and the aforementioned portable buildings. Most buildings are adjoined by a network of covered exterior walkways. The rear (north) side of campus is occupied by athletic fields and courts, while parking lots are located at the northeast and northwest ends of the campus.

The Cafetorium, Library, and Administration buildings are aligned parallel to Middlefield Road and make up the campus' focal point. Completed with the initial development of the campus, these buildings share a modest Mid-Century Modern architectural style and are characterized by a one-to-two-story massing, stucco cladding, low-pitched roofs, and expanses of wood-sash windows. Located at the east end of this cluster, the Cafetorium is the largest of the three buildings. The one-story, irregular-plan building centers on a high-ceilinged portion with a low-pitched gabled roof. Shorter flat-roof sections project from the north, south, and east elevations. All sections of the building are stucco-clad. The gabled section of the building features large banks of fixed, wood-sash windows that reach just below the broadly overhanging eaves. Windows on the flat-roof sections include ribbons of wood-and metal-sashes, including a series of clerestory windows on the east elevation. Entrances are located on the north, south, and east elevations and feature glazed wood double doors, and solid wood single doors. The north entrance is deeply recessed. Covered walkways with supported by round, metal poles trace the north and south elevations.

See continuation sheet, page 4.

*P3b. Resource Attributes: HP13. Community center/social hall; HP15. Educational building

*P4. Resources Present: ☐ Building ☐ Structure ☐ Object ☐ Site ☒ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photo or Drawing



P5b. Description of Photo:
Cafetorium, north elevation, view east

***P6. Date Constructed/Age and Sources:**

☒ Historic ☐ Prehistoric ☐ Both

See B6. Construction History.

***P7. Owner and Address:**

N/A

***P8. Recorded by:**

James Williams and JulieAnn Murphy
66 Franklin Street, Suite 300
Oakland, CA 94607

***P9. Date Recorded:**

September 5, 2019; October 10, 2025

***P10. Survey Type:**

Intensive

***P11. Report Citation:**

Murphy, JulieAnn, James Williams, and Steven Treffers.. 2019 *Historical Resource Assessment for the Cubberley Community Center Master Plan Project, 4000 Middlefield Road, Palo Alto, California. Rincon Consultants Project No. 254-16944. Report on file at the Northwest Information Center, Sonoma State University, Rohnert Park, California*

*Attachments: ☐ NONE ☒ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record

☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record

☐ Artifact Record ☐ Photograph Record ☐ Other (List):

State of California X Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary #
HRI#
Trinomial

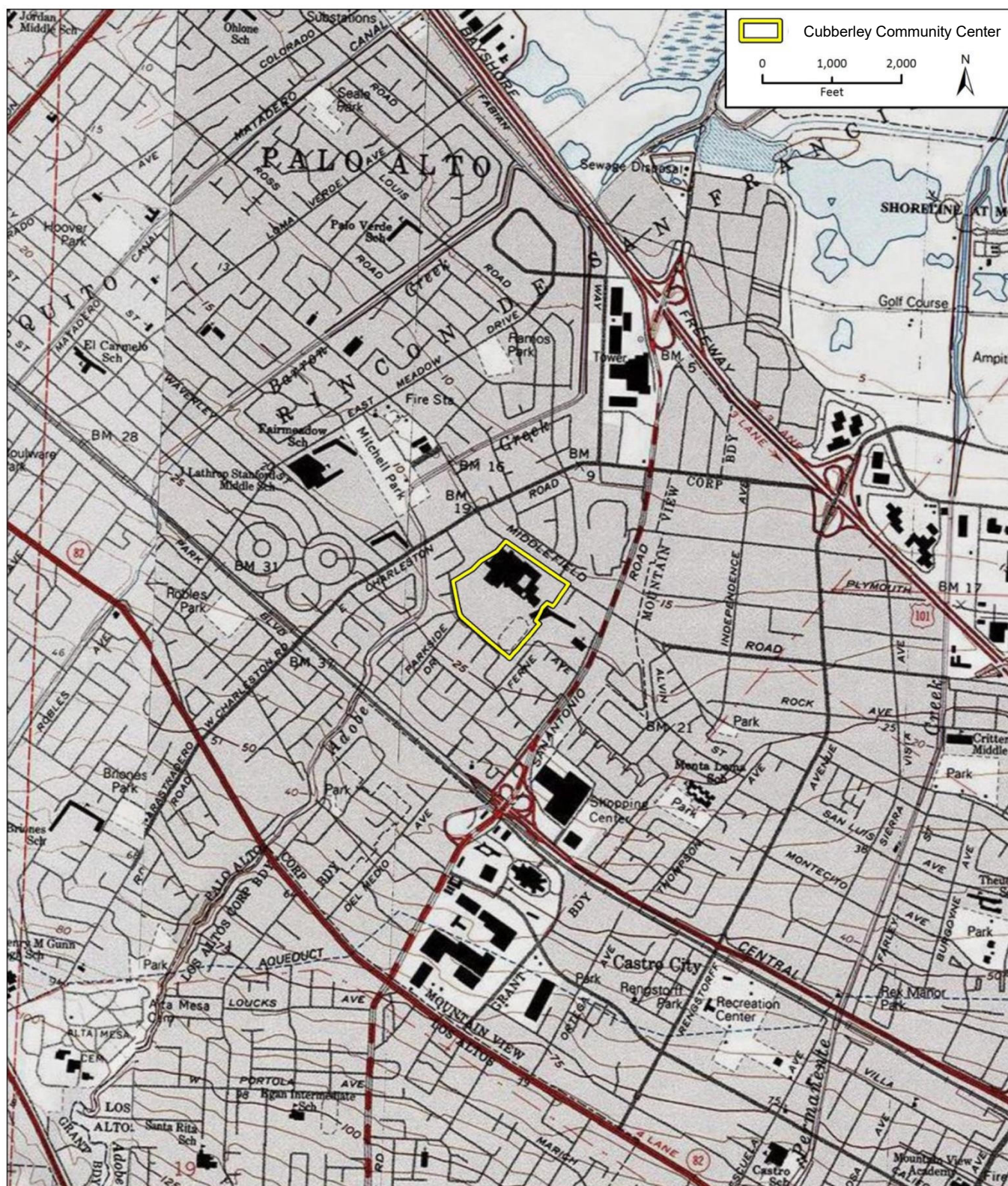
Page 2 of 12

*Map Name: *Mountain View*

*Scale: 1:24,000

*Resource Name or # Cubberley Community Center

*Date of map: 2015



BUILDING, STRUCTURE, AND OBJECT RECORD

*Resource Name or # Cubberley Community Center

*NRHP Status Code 6Z

Page 3 of 12

B1. Historic Name: Ellwood P. Cubberley High School
B2. Common Name: Cubberley Community Center
B3. Original Use: Public high school B4. Present Use: Community center
*B5. Architectural Style: Mid-Century Modern, New Formalism
*B6. Construction History:

The campus was originally developed in 1956, including the Administration, Cafetorium, Library and Gymnasium buildings, and classroom units A through F, and J through M. The Pavilion and Unit H were completed ca. 1965 and the Theatre and Units I, P and V between 1968 and 1980 (Netronline 1968; 1980; UCSB Maps & Imagery Library 1965). Two portable buildings were added to the periphery of the building complex around the turn of the twenty-first century (Netronline 1998; 2002; 2004). Visible alterations are minimal, but include additions to Units J and L and the boarding over of windows in some locations.

*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: N/A Original Location: N/A

*B8. Related Features: None

B9a. Architect: Clark and Stromquist; Clark, Stromquist, Potter & Ehrlich b. Builder: Unknown

*B10. Significance: Theme N/A Area N/A

Period of Significance N/A Property Type Public school Applicable Criteria N/A

Following World War II, California experienced staggering population growth due to a combination of in-migration and the nationwide Baby Boom. These pressures exerted themselves locally, as Palo Alto's population climbed from around 17,000 in 1940 to approximately 25,000 in 1950. Through the 1950s, the city's population more than doubled, reaching 52,000 in 1960 (World Population Review 2019). As part of this growth, much of the former farmland surrounding the subject property was developed, mostly for single-family residential uses, in the 1950s (Netronline 2019).

Across California, postwar population growth highlighted a shortage of public school classroom space (Sapphos Environmental 2014). Growth in Palo Alto led Palo Alto Unified School District (PAUSD) officials to initiate a local school building program. Planning for the eventual Ellwood P. Cubberley High School was under way by October 1952, when the PAUSD school board won a condemnation suit over the high school's 35-acre site. Under the terms of the ruling, property owners Floyd and Alice Lowe received a payment of \$134,596 for the former farmland (Peninsula Times Tribune 10/17/1952). The board hired the architecture firm of Birge M. Clark and Walter S. Stromquist to design the campus. General contractor Howard J. White, Inc. was selected to carry out its construction. Architects' fees and projected building costs pushed the total amount of the contract to approximately \$1.75 million (Architect and Engineer 1955; Peninsula Times Tribune 10/26/1954). See continuation sheet, page 5.

B11. Additional Resource Attributes: N/A

*B12. References:

archINFORM.com. 2019. "Clark, Stromquist, Potter, Ehrlich Partnership." [web page]. <https://www.archinform.net/arch/84295.htm>. Accessed September 10, 2019.

Architect and Engineer. 1955. "Construction Contracts Awarded and Miscellaneous Personnel Data." August. Via Internet Archive. <https://archive.org>. Accessed July 31, 2019.

Aron, Nina Renata. 2017. "This 1967 Classroom Experiment Proved How Easy it Was for Americans to Become Nazis." Timeline. [web site]. <https://timeline.com/this-1967-classroom-experiment-proved-how-easy-it-was-for-americans-to-become-nazis-ab63cedaf7dd>. Accessed September 10, 2019.

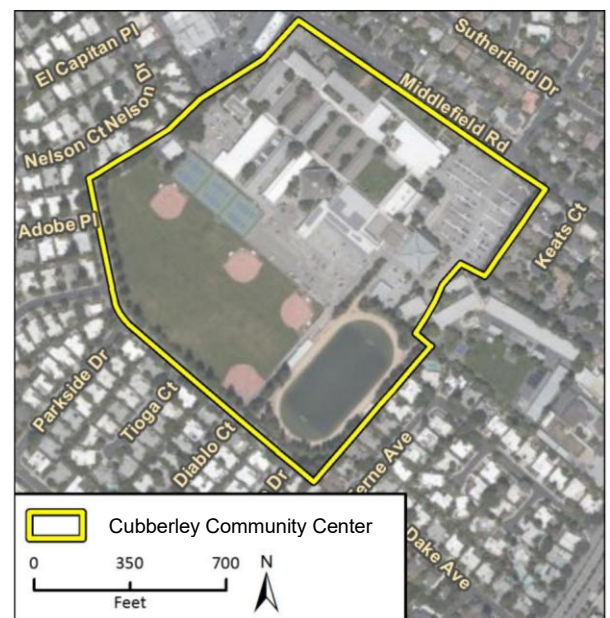
See continuation sheet, page 7

B13. Remarks:

*B14. Evaluator: J. Williams and J. Murphy Rincon Consultants

*Date of Evaluation: November 22, 2019; October 10, 2025

(This space reserved for official comments.)



*Recorded by: J. Williams and J. Murphy, Rincon Consultants *Date: November 22, 2019; October 10, 2025 ■Continuation □Update

P3a. Description (continued):

Located immediately west of the Cafetorium is the Library, a one-story, L-plan building with a low-pitched, single-slope roof with wide overhanging eaves. It features ribbons of windows on two sides: tripartite, wood sashes with a central band of hopper windows on the east and fixed, wood-sash clerestory windows on the west. A louvered metal structure shelters the east elevation windows. A single glazed wood door was observed on the east elevation. Due to limited access at the time of the field survey, no further details were recorded.

Located west the Library is the Administration Building. Constructed on a T plan, the building has a flat roof with wide eaves—cantilevered on the north and supported by metal poles on the west. Its street-facing elevation is dominated by an alternating series of solid wood doors and large, fixed, wood-sash windows. A ribbon of hopper-style transom lights runs continuously above the doors and windows. A similar pattern of fenestration occurs on the rear (north) elevation, where the doors and windows face a pair of landscaped courtyards. The main public entrance faces south and features glazed double doors with a large wood sash transom above and two full-height windows to the left. Extended eaves shelter walkways on the south and west elevations.

Eleven classroom wings extend perpendicularly from the central cluster of buildings. They are linked by system of covered walkways and modestly landscaped courts. Most of the classroom wings (Units A through F and J through L) date from the school's original construction and share a common design. They are one story tall, rectangular in plan, one room deep, and topped with a two-tiered roof that is flat on the west and pent on the taller east side. The wood-frame buildings are clad uniformly in stucco. Each has three ribbons of windows: wood-sash hopper windows on the east elevation, bipartite wood-sashes with hopper-style transoms beneath the flat-roof eave of the west elevation, and west-facing clerestory windows just below the peak of the pent roof. Entrances generally face east and consist of wood doors with small, rectangular lights. West-elevation doors occur occasionally, however. Pent roof forms extend to the east to form walkway shelters, with round, metal supporting poles.

Exceptions to the general design of instructional buildings include the Units L, H, and V. Constructed as the Industrial Arts building, Unit L shares most of the classroom wings' design characteristics, but is taller and built on a larger scale. The L-plan building has a low-pitched gabled roof with broad eaves. Its east elevation is punctuated with ribbons of wood-sash windows on the mezzanine and ground levels. The west elevation includes a bank of tripartite windows with central hopper sashes. Entrances are located on the east and west elevations and feature standard-size entry doors and a trio of wood swing-up garage doors. The garage doors are clustered at the ell formed by a ca.-1960 addition and include one south-facing and two east-facing doors. Units H and V differ principally the general classroom design in that they have gabled roofs. Unit V is also substantially smaller than the other classroom buildings.

Located just southeast of the classroom wings, the Gymnasium (Unit G) and Theatre (including the adjoined Unit M) flank the outdoor Amphitheater area. Irregular in plan, the Gymnasium consists of a high-ceilinged section with a gabled roof and a pair of flat-roof wings that form an ell at the building's rear. Like other buildings completed with the property's original development it is stucco clad. Its structural system includes wood- and steel- frame sections. A ribbon of clerestory windows—spaced by vertical steel structural elements—fills the building's gable ends, while windows on the wings are comparable to those found on the campus' original classroom buildings. Entrances are found on most elevations and include both single and double wood doors. As with most buildings on the property, covered walkways follow much of the Gymnasium's perimeter. The only visible alteration to the building is a series of solar panels supported by metal spider leg supports along the north elevation. Aerial imagery suggests there are also solar panels installed on the roof.

Original to the campus, Unit M is adjoined to the Theatre, which was completed sometime between 1968 and 1980. While Unit M's design is consistent in style, materials, and scale with its 1950s counterparts, the New Formalist-influenced Theatre differs markedly the campus' original architecture. Rectangular in plan, the building rises from a canted concrete podium to culminate in a shingle-clad, pyramidal roof with a wood-clad cupola. Its tilt-up concrete construction is embellished with concrete pilasters and aggregate-finish panels. Concrete stairs approach the podium from the north and south, leading to the east-facing main elevation, which is punctuated by a central multi-pane window with flanking metal-framed commercial door and window assemblies. A flat-roof hyphen connects the Theatre to Unit M.

Many of the Theatre's design elements are also present in the Pavilion and Units I and P. The Pavilion, located just south of the Theatre, is irregular in plan, sits on a concrete foundation, and is composed of two sections: an auditorium and a lobby/service area. The auditorium section is housed under a shingle-clad, pyramidal roof with a pyramidal cupola. Its exterior is characterized by aggregate finish panels and reinforced concrete pilasters similar to those found on the Theatre. The lobby/service area is flat-roofed, stucco-clad, and bounded by covered walkways whose shelters are supported by squared columns that mimic the design of the building's pilasters.

Unit I is a two-story office building located between the Gymnasium and Unit J. Square in plan, its orientation is offset from the surrounding buildings by approximately forty-five degrees. It rises from a concrete foundation to culminate in a pyramidal roof with asphalt shingles and a wood-slat-clad monitor. Its recessed ground level is clad with aggregate-finish panels, while the upper level is stuccoed. Load-bearing square columns are spaced evenly on all four elevations. Windows are placed at even intervals and display full-height, multi-pane metal sashes on the first story. Second-story windows flank the exposed columns and include metal sashes and enamel panels filling the lower one third of the aperture. Ground-floor entrances are found throughout and feature a combination of wood and non-original metal single doors. Doors are alternately double and single and many include glazing in varied configurations. An exterior staircase with metal rails and concrete steps accesses a second-story entrance. A parking area and raised concrete planters are located immediately outside the building.

See continuation sheet, p. 5.

*Recorded by: J. Williams and J. Murphy, Rincon Consultants *Date: November 22, 2019; October 10, 2025 ■Continuation □Update

P3a. Description (continued):

Located near the southwest corner of the building complex, Unit P is a one-story classroom building that incorporates many of the design features of the Theatre, Pavilion, and Unit I (Figure 19). The rectangular-plan building culminates in a hipped roof with asphalt shingle cladding, a wood-slat HVAC shelter, and wide eaves. Its aggregate finish wall cladding and exposed structural members are consistent in design with its counterparts. Entrances are located on all four elevations and feature glazed and solid wood doors. Windows are limited to the metal-frame transoms and sidelights accompanying the four doors on the north elevation. A covered walkway leads to Unit H. To its immediate west is a large, raised concrete planter.

Finally, there are two one-story portable buildings located at the southwest (Unit Q) and southeast (Unit R) corners of the building complex. Both are rectangular in plan with T1-11 siding. Unit Q has a flat roof and aluminum sliding windows, while Unit R features a low-pitched gabled roof and vinyl windows.

The northern half of the campus includes athletic facilities, including softball diamonds, soccer/rugby fields, clay tennis courts and a running track with metal bleachers. The rear (north) boundary is lined with mature trees. Landscaping elsewhere on the generally level campus includes a large lawn and mature trees at the front (south) end of the building complex and planters with shrubs and mature trees planted alongside several buildings and in the courts between classrooms.

The campus' buildings are in good condition and have been subject to few visible alterations. New, commercial-style doors have been installed in a few locations and of several windows on the west elevation of Unit J have been boarded over. Overall, however, doors and windows are mostly original, and there is little evidence that exterior walls have been resurfaced. Additions were constructed on the south elevations of Units J and L and the Theatre adjoined to the east elevation of Unit M.

The overall campus plan is largely intact, but was disrupted somewhat with the construction of non-original buildings starting in the 1960s. These buildings were constructed at the periphery of the building complex, however, and did little to detract from either the original finger-plan layout or the division of the campus into a north-end building complex and south-end athletic field area.

B10. Significance (continued):

Renowned as one of Palo Alto's most accomplished architects, Clark studied architecture at Stanford University in the 1910s and got his start in the field working under his father, architect and Stanford professor Arthur Clark. In 1919, following his service in World War I, Birge assisted his father in the design of the Stanford residence of future U.S. president Herbert Hoover. By the 1920s, Birge and his brother David established an independent practice based in Palo Alto, and designed residences and commercial and institutional buildings in and around Palo Alto. In the 1930s, Birge's commissions included designs for Palo Alto Children's Library at the request of local philanthropist Lucie Stern (later, Birge would also design Stern's residence). Considered some of his most respected works, Birge's designs during this period were often in variants of the Spanish Colonial Revival style. Over the course of his career, Birge was responsible for approximately 200 buildings in Palo Alto and on the Stanford University campus (PaloAltoHistory.org 2019; Palo Alto Stanford Heritage 2019).

Stromquist, an alumnus of the University of California, Berkeley, worked in the Clarks' practice as a draftsman in the 1930s, and in 1945 became a named partner beside Birge. Among Clark and Stromquist's projects were several commercial and institutional commissions, including an office building designed for the Hewlett-Packard Corporation (PCAD 2019a; Turner 2010). Besides Cubberley High School, Clark and Stromquist designed at least three other schools in the early 1950s: Benjamin Cory Elementary School and Camden High School in San Jose and Elizabeth Van Auken Elementary School (now Ohlone Elementary magnet school) (PCAD 2019a; archINFORM 2019). The firm incorporated architects David Farington Potter and Joseph Ehrlich as named partners by the 1960s. Stromquist died in 1980, while Clark passed in 1989 (PCAD 2019b, 2019c, 2019d).

As designed by Clark and Stromquist, the Cubberley, Cory, and Camden campuses were functionalistic in their architecture and organized in variants a so-called finger plan, in which rows of long, rectangular classroom buildings extend from a central point or cluster of buildings (Google Maps 2019; Cougars' Tales 2001). Common in California in the 1950s, the functionalist finger plan school was the product of experimental efforts in the 1930s to produce economically a child-centered style of school facility. Buildings were typically one or two stories and built on a "domestic" scale that designers believed would be less imposing to children than the monumental designs that characterized earlier generations of public school architecture. Care was taken with the placement of windows, which often occurred in large expanses in order to provide optimal natural lighting and ventilation. In addition, exterior doorways and covered exterior corridors were employed to integrate indoors and outdoors spaces (Sapphos Environmental 2014).

Cubberley High School possesses many hallmarks of the functionalist finger plan campus. Designed in an unornamented Mid-Century Modern style, its original physical plant centers on the former Cafetorium, Library, and Administrative Offices, which front Middlefield Road. Covered walkways adjoin these buildings to five parallel rows of one-story classroom buildings that extend toward the rear of the complex. One room deep, the typical classroom building includes three ribbons of windows, including a clerestory series placed just below the peak of a low-pitched pent roof.

See continuation sheet, p. 6

*Recorded by: J. Williams and J. Murphy, Rincon Consultants *Date: November 22, 2019; October 10, 2025 ■Continuation □Update

B10. Significance (continued):

Cubberley High School opened in the fall of 1956. Aside from small additions to Units J and L, few notable changes were made to the campus until around the mid-1960s. Major expansions of the physical plant included the completion of the Pavilion between 1963 and 1968 and the Theatre and Units I and P between 1968 and 1979. The architecture firm of Clark, Stromquist, Potter & Ehrlich designed the Pavilion in 1963 (CSPE 1963). It was completed under a construction contract initially estimated at \$250,000 (Peninsula Times Tribune 8/20/1963). In 1968, Clark, Stromquist & Potter submitted designs for the other three buildings (CSP 1968). Bearing the influence of the New Formalist style, the four buildings share such design elements as reinforced concrete construction, a heavy vertical emphasis, series of pilasters, aggregate finish cladding, and hipped or pyramidal roofs with cupolas or monitors.

During the 1960s, the school was known for its student activism. In February 1969, Cubberley's Black Student Union backed a student strike for equitable treatment for African American pupils in matters related to curriculum, staffing, and discipline. After participants refused to end their walk-out, thirty-nine students were issued five-day suspensions (The Times 1969; The Catamount 1969; Macovski 1969). By at least one account, these events were part of a broader wave of student-led demonstrations that occurred at Cubberley between 1967 and 1969 (Williams 1971). The administration and faculty appeared to warm somewhat to the student body's political engagement by the early 1970s. In April 1971, the school hosted a three-day "convocation," during which students were excused from class to attend lectures by a diverse stable of speakers that included the conservative John Birch Society (who ultimately canceled their appearance) and Maoist and pacifist Stanford professor Bruce Franklin (Flynn 1971a; 1971b).

Cubberley was also the site of a notorious instructional experiment remembered as the Third Wave. In 1967, social studies instructor Ron Jones attempted to demonstrate the susceptibility of ordinary people to the appeals of fascist movements by drafting members of one of his classes into a mock political movement branded the Third Wave. Jones enticed students to pledge loyalty to him, greet fellow members with an exclusive salute, and even betray the confidence of classmates believed to be disloyal to the fictional movement. Jones was surprised by the eagerness with which many students embraced the project, and after five days concluded the exercise with a cautionary message about the risks of strident political conformity. While the Third Wave experiment was later the subject of many articles, at least two documentary films, and a theatrical play penned by Jones himself, it gained little contemporary recognition outside Cubberley and is not known to have had an important influence on social sciences pedagogy (Lee and Cockerell 2016; Aron 2017; JosephKaminski.org 2019).

Amid the Tax Revolt of the late 1970s, California voters approved Proposition 13, a 1978 ballot measure that, among other things, limited the collection of property taxes. It measures went into effect for the 1978-1979 fiscal year and resulted a steep decline in tax revenues across the state (Ehn 2004). Public school funding was a notable casualty of the new law, and in 1979, the PAUSD found itself approximately \$2 million short of its projected budget. This fact, combined with more than a decade of declining PAUSD enrollments, informed the school board's decision to shutter several elementary schools and one of its three high schools. Both Cubberley and Gunn High School (opened in 1964) were under consideration for closure, but the board eventually voted 3 to 2 to close Cubberley. A lawsuit and a petition drive netting 6,000 signatures failed to reverse the board's decision, and the campus was abandoned as a public high school after the 1979-1980 academic year (PaloAltoHistory.org 2019b; Lassiter 1979). The property was soon repurposed as Cubberley Community Center, and its rooms were rented to for educational and public uses. Tenants included the United States Geological Society, California Department of Forestry, Peninsula Children's Center, Mayfield Continuation School. By 1982, rental receipts averaged around \$500,000 per year and profits about \$270,000 annually (Doyle 1982). Cubberley remained in use as a community center as late as September 2019, with tenants including Children's Preschool Center, Palo Alto Humane Society, Palo Alto Junior Museum and Zoo, Palo Alto Historical Association, among others.

Evaluation of Cubberley Community Center

The subject property is a former public high school campus developed in 1956, during a post-World War II public school construction in California. During the 1960s, it was the site of several Civil Rights and anti-Vietnam War demonstrations and gained local notice for unconventional approaches pedagogy and student-faculty-administration relations. However, research conducted for the present study did not suggest the property played an important role in Palo Alto's postwar school construction boom or that it was distinctly representative of postwar public education institutional development. Nor was the school important to the history of 1960s political activism or public school instructional methods, or in the context of any other event significant to the history of the city, region, state, or nation. As a result, the subject property is recommended ineligible under Criteria A/1.

Likewise, the school does not appear to be associated with the contributions of historically significant individuals. Research did not suggest that any member of Cubberley High School's faculty or administration made notable achievements during their service at the high school. Admittedly, Jones's Third Wave experiment retains a degree of notoriety, as evinced by continued interest in media related to the exercise more than fifty years after its conclusion. However, this notoriety outweighs any influence Jones's lessons might have had on teaching methods or in popular culture. Indeed, the Third Wave was little-known outside Palo Alto until it was publicized in a documentary decades after the events took place. And given that Jones—whether through this experiment or any other innovations in teaching—has had no documented influence on social studies instruction, the Third Wave is better regarded as cultural curiosity than as a significant event in the history of teaching. In light of this, the subject property is recommended ineligible under Criteria B/2.

See continuation sheet, page 7.

*Recorded by: J. Williams and J. Murphy, Rincon Consultants *Date: November 22, 2019; October 10, 2025 ■Continuation □Update

B10. Significance (continued):

The subject campus consists of buildings designed in the Mid-Century Modern and New Formalist styles and centered on a cluster of buildings arrayed in a finger plan. Neither the campus as a whole, nor any of its individual buildings, represents an exemplary application of these stylistic or formal traditions. In addition, while nearly all the campus was designed by the firm of famed Palo Alto architect Birge Clark, there is no indication the property is regarded as one of Clark's important achievements, or that it has been overlooked as such. Indeed, the campus is an unexceptional example of its type and styles, and other buildings—such as the President Hotel and the Lucie Stern Community Center—better represent the import of Clark's work in shaping Palo Alto's built environment. The subject property is therefore recommended ineligible under Criteria C/3.

A review of available evidence and records search results did not indicate that it may yield important information about prehistory or history (Criteria D/4/4). The property is also not recommended eligible as a contributor to any existing or potential historic districts.

For reasons explained above, the building is also recommended ineligible for listing in the Palo Alto Historic Inventory. It is not identified with the lives of historic people or with important events in the city, state or nation (Criterion 1); is not particularly representative of an architectural style or way of life important to the city, state or nation (Criterion 2); is not an example of a type of building which was once common, but is now rare (Criterion 3); and is not connected with a business or use which was once common, but is now rare (Criterion 4).

Local Criterion 5 allows for the designation of a building if its architect or the building itself was important. Nearly all the buildings comprising the former Cubberley High School were designed by architecture firms in which Birge Clark—an important Palo Alto-based architect—was a principal. However, as detailed above, numerous examples of Clark's work are found in Palo Alto, and research for this study did not suggest Cubberley High School should be considered exemplary of Clark's career. Additionally, research did not suggest that any other architects responsible for the school's design are regarded as important. The buildings comprising the property are also not important. Research for this study suggested, that although Cubberley High School attained a degree of local fame, it was an ordinary high school and was not uniquely associated with significant historical events or persons. Following the closure of the high school, the property served as a community center and was not important in this context either. Consequently, the property does not appear eligible for designation under local Criterion 5.

Finally, the property does not possess elements demonstrating outstanding attention to architectural design, detail, materials or craftsmanship (Criterion 6).

B12. References (continued):

Catamount, The. 1969. "BSU Speaks Out: Demands Listed." February 7. <http://www.cubberleycatamount.com>. Accessed July 31, 2019.

Clark, Stromquist, Potter & Ehrlich (CSPE), Architects. 1963. Cubberley High School Pavilion, Palo Alto Unified School District, Palo Alto, California. [architectural drawings].

Cougars' Tales. 2001. "Bird's Eye View." [web page]. <http://www.cougarstales.com/issue/7/>. Accessed September 10, 2019.

Clark, Stromquist, & Potter (CSP), Architects. 1968. Alterations and Additions—Ellwood P. Cubberley High School, Palo Alto Unified School District, Palo Alto, California. [architectural drawings].

Doyle, Matthew. 1982. "The Leasing of Cubberley, 1982." Palo Alto Weekly. December 21.

Ehn, Jennifer. 2004. "Proposition 13 at Twenty-Five." University of the Pacific, McGeorge School of Law. [website]. <https://www.mcgeorge.edu/publications/california-initiative-review/california-initiative-review-reports/proposition-13-at-twenty-five>. Accessed July 31, 2019.

Flynn, William. 1971a. "Harris Demands Revolution." San Francisco Examiner. April 13. Via Newspapers.com. [digitized archive]. <https://www.newspapers.com/>. Accessed July 31, 2019.

Flynn, William. 1971b. "Maoist, Senator Clash on Cure for Social Ills." San Francisco Examiner. April 16. Via Newspapers.com. [digitized archive]. <https://www.newspapers.com/>. Accessed July 31, 2019.

Google Maps. 2019. Street View imagery of various locations in Palo Alto and San Jose, CA. <https://www.google.com/maps>. Accessed September 10, 2019.

See continuation sheet, p. 8

*Recorded by: J. Williams and J. Murphy, Rincon Consultants *Date: November 22, 2019; October 10, 225 ■Continuation □Update

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Figure 1 Site Plan and Building Chronology



CONTINUATION SHEET

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Cafetorium Building, View Northwest



Library Building, View Northwest



Pathway at Administration Building (L), View South



Typical Classroom Wing, View West



Unit H, View North



Unit V, View South



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Property Name: _Cubberley Community Center
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Gymnasium, Unit G, View West



Amphitheatre, Unit G (R), Unit M (L)



Pavilion, View Southwest



Building I, View Northwest



Building P, View Southwest



Typical Walkway, View West





Portable Building, View Southeast



Playing Fields, View East