

**Appendix C**  
**220 Park Road Project Secretary of the Interior's Standards Analysis**



# 220 PARK ROAD SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

BURLINGAME, CALIFORNIA  
[P19091]

PREPARED FOR THE CITY OF BURLINGAME  
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FINAL





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## I. INTRODUCTION

This Secretary of the Interior's Standards Analysis has been prepared at the request of the City of Burlingame, for proposed alterations to 220 Park Road (APN 029-204-250). 220 Park Road was constructed from 1941-1942 as part of the nationwide post office construction program of the New Deal era to serve as the Burlingame Main Post Office. 220 Park Road is a one-story building located on a through-block lot in downtown Burlingame, with frontages on both Park Road and Lorton Avenue. The building was designed in a Spanish Eclectic (also called the Spanish Colonial Revival) style with Art Deco elements and features a large public lobby that is bookended by two identical entrances and entrance vestibules.

The former Burlingame Main Post Office at 220 Park Road has been found eligible for the National Register of Historic Places (National Register) under Criterion A (Events) and Criteria C (Architecture) and was found eligible for the local City of Burlingame Historic Register by Carey & Company through a 2008 survey for the Burlingame Downtown Specific Plan.<sup>1</sup> The property was deaccessioned from the United States Postal Service's property portfolio and sold in 2014, at which time a preservation covenant was attached to the building to ensure its continued preservation. This covenant guides the interpretation of the Secretary of the Interior's Standards (the Standards) in regard to future changes to the building.<sup>2</sup>

The proposed project includes demolishing the rear sorting room and Lorton Avenue façade of the former post office building, moving the historic resource temporarily off-site during the excavation and construction of two-stories of below-grade parking, returning the building to its historic location, and appending a six-story building behind the historic Park Road façade and the portion of the building which contains the highly significant historic public lobby. The completion of the proposed project will remove non-original material, rehabilitate the areas of primary significance to the building, and retain the majority of the character-defining features of the property.

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<sup>1</sup> The City of Burlingame has identified resources for listing on a local historic resource inventory, however, the system for listing and review has only recently been formally approved by the Burlingame City Council (as of November 2020).; Carey & Co. *Draft Inventory of Historic Resources: Downtown Specific Plan* (February 19, 2008); TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.

<sup>2</sup> United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language."

## Methodology

Page & Turnbull staff conducted a site visit on January 10, 2020, and the following documents were reviewed in the preparation of this memorandum:

- Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal." Proposed Project renderings and plan set. Dated October 14, 2020. (Attached as Appendix A)
- Dostart Development Company, LLC, Sares Regis, and Korth Sunseri Hagey Architects. "220 Park Rd –Preservation & Construction Impact Plan," Updated October 1, 2020. (Attached as Appendix B)
- United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language." 2014. (Attached as Appendix C)
- TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.
- Carey & Co. *Draft Inventory of Historic Resources: Downtown Specific Plan* (February 19, 2008).
- "Burlingame Post Office Competition Material, 1940-1942." National Archives and Records Administration, College Park, Maryland. Record Group 121-BS.

## II. SIGNIFICANCE & CHARACTER-DEFINING FEATURES

### Historic Significance

The Burlingame Main Post Office was constructed from 1941-1942 as part of the nationwide post office construction program of the New Deal era (**Figure 1**). The design, which was selected from a competition, was completed by Ulysses Floyd Ribble in a Spanish Eclectic style with Art Deco elements. The sculptural panels, placed over both the Park Road and Lorton Avenue entrances, were also selected by competition. The two identical panels, called “The Letter,” were designed by a Los Angeles sculptor, James Hanson. The building served as the Burlingame Main Post Office until it was sold in 2014. Its divestment was part of a larger trend of property divestment by the United States Post Office (USPS), particularly in regard to New Deal era post office facilities in downtown locations throughout the country.



Figure 1: Finished Burlingame Main Post Office, showing primary Park Road façade, May 1942. Source: National Archives, College Park, MD. Record Group 121-BS.

As stated previously, the former Burlingame Main Post Office at 220 Park Road has been found eligible for the National Register of Historic Places (National Register) under Criterion A (Events) and Criteria C (Architecture) and is eligible for listing in the City of Burlingame's Historic Register. To meet local requirements for the protection of historic resources under Burlingame's Historic Preservation



Ordinance, alterations to the historic resource will be overseen by the Burlingame Planning Commission.

Additionally, as part of the USPS divestment procedure, a preservation covenant was attached to the property to ensure that the building and the features that communicate its historic significance will be maintained and/or restored. This Preservation Covenant names the City of Burlingame or the State Office of Historic Preservation (SHPO) as the primary parties to oversee future alterations to the property. The preservation covenant is discussed below.

### USPS Divestment and the Burlingame Main Post Office Preservation Covenant

With the divestment of the Burlingame Main Post Office building from the USPS's property portfolio, a historic preservation covenant (Preservation Covenant), to be overseen by the City of Burlingame or the State Historic Preservation Office (or SHPO, in this case, the California Office of Historic Preservation), was attached to the property. The purpose of the Preservation Covenant for the former post office at 220 Park Road is to bind the grantee to restoring, maintaining, preserving, or rehabilitating the historic character-defining features listed below (see Character-Defining Features) in accordance with the recommended approaches of the Secretary of the Interior's Standards.

The key text of the Preservation Covenant reads:

The Grantee hereby covenants on behalf of itself, its heirs, successors and assigns at all times to restore, maintain, preserve or rehabilitate the historic character of this property as described in Paragraph 2 in accordance with the recommended approaches of the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings" (National Park Service, 1995), in order *to preserve those qualities that make the property eligible for listing on the National Register of Historic Places.* [emphasis added]<sup>3</sup>

The Preservation Covenant outlines the historic exterior and interior features that are character-defining and should be retained or sensitively treated to meet the requirements of the covenant. The covenant specifies that the Park Road façade is the primary and most significant façade and suggests that there may be more flexibility on the Lorton Avenue façade; specifically:

Though the same exterior features on the main façade exist on the secondary (Lorton Avenue) façade, the historic primary entry to the building is from Park Road. For this reason, proposals for construction, alteration or rehabilitation of the

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<sup>3</sup> United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language," 1.

property that affect the historic features of the Park Road façade are to be viewed with a more critical eye (pursuant to the Secretary of the Interior Standards). There may be greater latitude for modifications to the Lorton Avenue façade that still retain the essence of the historic exterior features (e.g. modification of spatial relationships among identified character defining features or relative to the street frontage, relocation of features, replication, or similar design approaches that are consistent with the Secretary of [the] Interior['s] Standards).<sup>4</sup>

This excerpted language provides some guidance on the interpretation of the Standards for this building (for the full text of the Preservation Covenant please refer to Appendix C) and is thus considered the guiding document regarding the application of the Standards to the former Burlingame Main Post Office. Additionally, the covenant is overseen by either the SHPO or the City of Burlingame, and due to the additional regulatory responsibility of the City of Burlingame in approving the proposed project, the City of Burlingame is acting as the covenant holder and will oversee the regulatory requirements of the agreement.

## Character-Defining Features

For a property to be eligible for national, state, or local designation under one of the significance criteria, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. To be eligible, a property must clearly contain enough of those characteristics, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The Preservation Covenant for the subject building includes a list of the character-defining features for the building that contribute to its significance as a representative example of a federally funded, New Deal era post office. According to the Secretary of the Interior's Standards for Rehabilitation, significance for architecture is supported by the retention of features that relate to design, materials, workmanship, location, setting, feeling, and association.

Exterior character-defining features of the building, as defined by the Preservation Covenant, include:

- The overall mass and plan of the main (Park Road) façade
- The poured concrete exterior siding and smooth stucco wall cladding
- Original metal frame windows
- Original bronze doors

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<sup>4</sup> Ibid.

- Red clay tile roof
- Cast stone Art Deco relief sculptures over the main entrances and under the windows
- Cast stone relief of a woman over the entrance doors<sup>5</sup>



Figure 2: Park Road (southwest) façade, looking northeast.

Interior character-defining features of the building, as defined by the Preservation Covenant, include:

- Original hanging ceiling light fixtures
- Marble wainscoting, including marble on vestibule walls
- Metal trim used throughout the interior: including metal grill work on the northwesterly wall of the lobby near the tall tables used by post office patrons (but not including non-metallic grillwork above the service windows)
- Original tall tables used for post office patrons
- Original service windows
- Original bronze bulletin board
- Federal star motifs
- Terrazzo flooring

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<sup>5</sup> The Preservation Covenant references bronze relief sculptures, however, "The Letter" is cast stone.

- Original windows and doors to and within lobby
- Cantilevered service desks
- Original post office boxes
- Original built-in lobby furniture, such as tables



Figure 3: Lobby, looking towards the Park Road entrance.



Figure 4: Lobby, looking towards the Lorton Avenue entrance.



Figure 5: Cantilevered desks between lobby windows.



Figure 6: Vestibule doors to lobby.



Figure 7: Doors to office wing from at left and entrance doors from Park Road at right.

### III. PROPOSED PROJECT DESCRIPTION

The proposed project description is based on plans dated October 14, 2020, by Korth Sunseri Hagey Architects (KSH), and the Preservation & Construction Impact Plan, updated October 1, 2020, that were supplied to Page & Turnbull by the project team on October 14, 2020.

The project team will retain a preservation architect who will ensure continued conformance to the Secretary of the Interior's Standards for Rehabilitation, advise on the treatment of the historic resource and its character-defining features, and will prepare historic rehabilitation construction documents to support the proposed project.

#### OVERALL PROJECT DESCRIPTION

The proposed project will append a six-story building to the northeast and southeast facades of the subject building and will be located primarily within the large setback on the Lorton Avenue side of the parcel. The new addition will contain approximately two hundred and eighty parking spaces (across two levels of below-grade and ground-floor parking), ground-floor retail along Lorton Avenue, and five floors of office space. This requires the demolition of the Lorton Avenue façade of the historic building, which contains character-defining features identical to the primary Park Road façade but is considered within the Preservation Covenant to be an area more open to flexibility and the possible relocation of design features. The rear mailroom and loading areas of the historic post office building, which were not found to be character-defining features within the Preservation Covenant and through previous documentation, will also be demolished to make room for the addition.<sup>6</sup>

Along the primary (southwest) Park Road façade and the northwest façade – which contains the historic post office lobby – the historic resource is retained with little change to the materials, design, feeling, or massing of the building.

In order to protect the historic resource from potential damage due to vibration during the excavation and construction of the below-grade garage levels, the former post office building will be temporarily moved to an adjacent site. A lack of available space within and adjacent to the construction site precludes the option of moving the historic resource's lobby wing and office wing

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<sup>6</sup> See: United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language," 1; TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.

off-site as a single unit, and instead the historic resource will be divided and moved in three parts.<sup>7</sup> A preservation architect, who will be joining the project team, will assist in the preparation for, and design and implementation of the building's move in order to safeguard the historic resource. The section which houses the historic lobby will be moved as a single unit and will include the entry terrace with its sidewalls and flagpole, as well as the northwest facing wall of the office wing. Below the level of the entry terrace, the precast concrete stair treads and risers will be deconstructed and stored for future reinstallation. The façade of the office wing that faces Park Road will be detached from its side walls with cuts parallel to Park Road. This section will include the partial height stucco clad wall that extends towards the existing driveway along the southeast property line. The third piece to be moved consists of the southeast-facing wall that contains the end gable of the office wing. The three sections of the historic building will be returned to their historic locations and orientations following the completion of this phase of construction. A new floorplate will be constructed for the office wing that will match the historic floor in its elevation and materiality, and a new roof structure will support the historic clay tile roof of the historic resource. The clay roof tiles, which will be disassembled and stored prior to moving the building, will be reinstalled to match original conditions. Once reassembled, the exterior of all remaining portions of the post office building will match historic conditions, to ensure the continued presence and materials of the historic resource's primary façade and character-defining features.

## Treatment of Exterior Façades

The primary façade of the historic resource will be retained in its entirety. At the far right (east) of the primary Park Road façade, a new office lobby will be constructed. This lobby, as proposed, is set back approximately 22'-9" from the front façade of the historic building and is further separated from the historic resource by a small setback – or hyphen – between the southeast-facing wall of the former post office's Park Road office wing and the west wall of the new office lobby. The placement of the lobby, set back along what was previously a driveway for mail trucks, retains the freestanding quality of the Park Road façade. Additionally, the lobby is clearly differentiated from the historic building through its use of a contemporary style with a fully glazed façade set between cast concrete side walls. The hyphen – which leads to a fire command room and a secondary service entrance for the office wing – will be further differentiated with a painted aluminum surface. Along this façade, the upper stories of the proposed addition are set back significantly, approximately 60 feet, from the primary façade of the historic resource. A portion of this setback, located behind the clay tile roof

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<sup>7</sup> The description of the proposed move of the historic resource is based on a conversation with representatives of 220 Park – Burlingame LLC (project sponsor), Garden City Construction (contractor), and Page & Turnbull, that took place on August 17, 2020, and is supported by the "220 Park Rd –Preservation & Construction Impact Plan," Updated October 1, 2020. (see Appendix B).

and parapet of the historic resource, will be used as an exterior terrace along the second floor of the addition.

The northwest façade of the building, which contains the historic lobby, will largely be retained with the exception of the section holding the Lorton Avenue entrance vestibule. The Lorton Avenue entrance vestibule will be demolished, and the new addition will meet the historic building at this point; the existing paired glass doors and side-lites will be retained in situ although rendered inoperable due to differing floor levels between the historic building and the new addition. The full length of the historic lobby will be retained with its seven bays of fenestration. A new terrace will be constructed along the northwest façade and three of the openings for the existing windows will be expanded down to meet the floor in order to insert doors between the historic lobby and the new terrace. This is intended to activate the building's relationship to a new public park that is planned for the adjacent parcel (currently city parking lot E). The existing, non-original accessibility ramp at the southwest corner will be replaced with a new code-compliant ramp.

Portions of the historic building along Lorton Avenue that will be demolished, including character-defining features, will be salvaged and reinstalled at other locations on the project site. These features are identical to those found on the Park Road façade. As specified in the Preservation Covenant, alterations to features on the Lorton Avenue façade are provided with more leniency, while the Park Road façade is considered more significant and the acceptable level of change is more limited. Historic features of the Lorton Avenue façade that will be salvaged and reinstalled at new locations within the addition include the sculptural panel (The Letter), the multi-lite metal frame double-leaf entry doors with decorative eagle transom and metal door surround, and the small sculptural eagle tiles under each window. As currently proposed, the Letter will be mounted over the stairs within the public entrance to the parking garage along the south corner of the northwest façade of the addition, the Lorton Avenue entrance doors and door surround will be mounted along the southeast interior wall of the public parking garage lobby, and the eagle reliefs may be installed along the northwest façade of the public parking garage lobby or will be incorporated into design features for the proposed park at the current location of the adjacent Parking Lot E.<sup>8</sup>

## Design of the New Addition

The new addition is designed in a contemporary style to remain differentiated from the historic structure, while complementing the historic resource through a reference to Art Deco massing and the treatment of windows and spandrel panels that are slightly recessed and vertically grouped. The proposed cladding material of the addition is primarily precast concrete, with some locations being

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<sup>8</sup> See Sheet A2.3. Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal." October 14, 2020.

fully glazed such as along the sixth floor, the corner bay over the entrance to the public parking garage, and the Park Road lobby entrance to the addition. Other cladding materials used along the addition include brick veneer, ceramic tile, and painted aluminum.

Setbacks along Park Road, both at the ground floor and the second story help to preserve the spatial characteristics of the historic resource as a historically freestanding building with a rectangular geometric massing that illustrates elements of the Art Deco style. Additional setbacks along the northwest façade and Lorton Avenue create terraces and a variable stacked volume that complements the Art Deco features of the post office building and its historic context.

Areas where the new addition meets the historic building include the north end of the former post office's northwest façade (containing the historic lobby) and at the far east (right) end of the Park Road façade where the new office lobby will be constructed (discussed above). As currently proposed, the southwest-facing ground floor of the addition features a flat concrete wall at its right end (where it meets the historic building's northwest facade), which is different in both its texture and color from the painted stucco of the historic resource. Additionally, the fenestration of the addition's second floor at this location clearly illustrates that this portion of the façade follows a different interior arrangement and floor height than the historic resource. The new wall space at the ground floor may be used to solicit a public art piece, which would be in keeping with the history of public art intended for the property and would complement the historic post office typology.

### Interior Spaces: Historic Lobby and Office Wing

Within the former Burlingame Main Post Office, the interior lobby and Park Road vestibule will be preserved with few changes to the resource's historic materials, spaces, or features. The Park Road vestibule will retain its marble wainscoting, interior multi-lite double doors and multi-lite flanking side panels, historic light fixture, and historic glass-panel double doors that lead to the historic office wing along Park Road. Areas of damage to the plaster wall and ceiling surfaces and marble wainscoting will be repaired.

The historic lobby is the most significant interior space in the former post office building. As such, almost all character-defining features are planned to be retained, including historic pendant light fixtures (including those with federal star motifs), terrazzo flooring, original wall-mounted tables, original service windows, original mounted metal vitrines, and original post office boxes. The vestibule doors and their matching side-lites that lead to both the Park Road and Lorton Avenue entrances will be retained. The primary, Park Road vestibule will be retained in place; however, the Lorton Avenue vestibule doors will be non-operable – as this is where the historic resource and new addition meet – and the double doors and side-lites will be made into a display area that may house



interpretive displays and salvaged historic material. While one door opening exists within the southeast wall of the lobby, two additional openings will be added to provide access between the lobby and a rear service hall (located behind the southeast lobby wall) that will provide access to the office wing. These openings and the service hall will support the reuse of the lobby for a possible food and beverage retail use. The existing opening – at the north end of the lobby – will lead to a new bathroom and janitorial closet. One opening is proposed to be installed where an existing opening for mail and package drop-off is located to the right of the northern (left) service window, while the second new opening is proposed to be installed at the location of the wall mounted bulletin board (or vitrine) at the south end of the lobby.<sup>9</sup> Both openings will require the removal of a small amount of marble wainscoting along the lobby wall, however the placement of new doorways in the existing location of an opening and a bulletin board will limit the amount of marble wainscoting to be removed, and will allow for the retention of all post office boxes and service windows. Any original marble wainscoting that must be removed will be salvaged to repair or replace other historic material during the rehabilitation of the historic resource.

Features that are largely being retained but may be salvaged in select locations include the lobby's marble wainscoting and historic metal grilles located under the center three windows along the northwest wall. Additionally, the upper portions of these three metal sash windows will be retained while the lower portions will be altered and selectively removed to allow doorways to be inserted, providing access from the lobby to the proposed exterior terrace and park. Features that are not historically significant and will be removed include the plasterboard carousel near the Lorton Avenue entrance, the acoustical tile on the walls and ceiling, the plaster finish on the ceiling, and the fluorescent light fixtures over the wall-mounted tables.<sup>10</sup>

The Lorton Avenue entrance vestibule will be partially demolished for the erection of the addition. As mentioned above, the original main entrance door assembly will be relocated, while the original door assembly between the Lorton Avenue vestibule and the lobby will be retained in place but rendered inoperable (see above). As the rest of the vestibule will be demolished, historic materials that may be salvaged include the marble wainscoting, terrazzo flooring, and the pendant Art Deco light fixture.

Non-public areas housed within the office wing parallel to Park Road include historic offices, restrooms, closets, and two vaults with vault doors. None of these interior spaces or features have been determined to be character-defining. The double doors leading to the office wing from the Park Avenue vestibule will be retained along with the metal "Postmaster" lettering mounted over the

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<sup>9</sup> Ibid.

<sup>10</sup> These features were determined to not be character-defining features as described in the Preservation Covenant.

doorway. Due to the need to move the primary historic elements of the building off-site during initial phases of construction, the interior of the office wing including the floor and roof will be demolished, allowing the exterior walls to be moved in two pieces to the parking spaces along Park Road for storage. The clay tile roof of the office wing is a character-defining feature of the building and will be disassembled, stored during construction, and then reinstalled on a new roof structure that matches the pitch and dimensions of the historic roof design. When the exterior walls are reinstalled in their original location, a new floor structure will be installed to match the elevation of the historic floorplate, ensuring that the interior volume will read as it was historically when viewed from the exterior.

The office wing will be converted to retail use. While these historically non-public areas have not been found to contain character-defining features, the project as proposed will salvage some features and materials as possible for reuse, including the existing vault door assemblies within the offices and sorting room, and the original marble panels in the men's restroom at the south corner, as well as the marble panels in the women's bathroom at the east corner of the Lorton Avenue side of the building.

## IV. SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

The following sections assess the proposed project's compliance with the Secretary of the Interior's Standards for Rehabilitation.

### Secretary of the Interior's Standards

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (the Standards) provide guidance for reviewing proposed work on historic properties and are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources.<sup>11</sup> Conformance with the Standards does not determine whether a project would cause a substantial adverse change in the significance of a historic resource. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the Standards may or may not cause a substantial adverse change in the significance of an historic resource.

The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four treatments are summarized as follows:

**Preservation:** The Standards for Preservation “require retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.”

**Rehabilitation:** The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character.”

**Restoration:** The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

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<sup>11</sup> Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed July 23, 2020, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

**Reconstruction:** The Standards for Reconstruction “establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”<sup>12</sup>

Typically, one set of standards is chosen for a project based on the project scope. For the purposes of the proposed project at 220 Park Road, the Standards for Rehabilitation, which “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character,” would be the appropriate Standards for the proposed project’s scope.<sup>13</sup>

## Standards for Rehabilitation Analysis

The following analysis applies each of the ten Standards for Rehabilitation to the proposed project at 220 Park Road. This analysis is based on the resubmittal plan set of the proposed project dated October 14, 2020, by Korth Sunseri Hagey Architects (KSH), and the Preservation & Construction Impact Plan, updated October 1, 2020, that were supplied by the Project Team.

**Rehabilitation Standard 1:** *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*<sup>14</sup>

*Discussion:* The proposed project will expand the retail and office uses of the parcel through the construction of the addition, while reusing the historic lobby and the office wing of the historic resource for retail use. The historic lobby was used in a retail capacity as a post office lobby with mailboxes and service counters for the public from its completion in 1942 until its sale by the USPS in 2014. Therefore, while the lobby will see changes to its pattern of use, as it will likely be used in a food and beverage retail capacity, it will remain as a retail space that is open to the public. The original office wing along the primary façade will be converted retail use and may be a support space for the retail tenant of the lobby, with new bathrooms, a kitchen, and storage space. The interior of the office wing – which does not contain any character-defining features – will be removed during the process of moving the historic elements of the building off-site during the early phases of construction. When the historic lobby space and southwest and northwest façades are reassembled on site, a new interior will be constructed within the office wing. The proposed change in use and the construction of a new interior will not impact the fenestration or exterior envelope of the office wing and any required venting and utility access will be carried through the new addition

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<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> This and the following Standards are listed in Grimmer (2007) and also at National Park Service, U.S. Department of the Interior, “Technical Preservation Services: Rehabilitation as a Treatment,” accessed July 23, 2020, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

so as not to impact the features and massing of the historic building. Minimal change to the distinctive materials, features, spaces, and spatial relationships of the historic resource will be required to allow for its expanded use as a retail space and the proposed project is consistent with Standard 1.

**Rehabilitation Standard 2:** *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

*Discussion:* The proposed project retains and preserves nearly all of the character-defining features and spaces of the historic resource. In order to complete the project as proposed, the Lorton Avenue façade will be demolished and the mail sorting room and back of house spaces will be demolished to allow for the construction of the new addition. While character-defining features are present on the Lorton Avenue façade, these features are identical to those found on the more significant Park Road façade. Guidance approved by the SHPO and outlined in the Preservation Covenant attached to the former post office building allows for more flexibility and change on the Lorton Avenue façade in order to facilitate the reuse of the historic building. Due to this guidance, the removal and relocation of character-defining features on the Lorton Avenue façade is an acceptable step as long as those same features on the Park Road façade remain intact. Additionally, the features that will be removed along Lorton Avenue – including the sculptural panel (The Letter) and the multi-lite metal frame double-leaf doors with decorative eagle transom and pressed metal door surround will be salvaged and reinstalled in new locations within the addition. The small sculptural eagle reliefs will be salvaged and are planned to be integrated either into the exterior façade of the new public parking garage lobby or into features of the planned park on the adjacent lot (currently Parking Lot E).

The proposed project will retain the significant spatial characteristics of the building and members of the public will continue to interact with the primary spaces of the building as was historically intended; the public will approach from Park Road, climb the stairs to the entry terrace, enter the main doors into the vestibule, and travel through the vestibule into the historic lobby space. At both the exterior and interior spaces the character-defining features, historic materials, and spatial characteristics of the building will be retained. The articulation of the addition with its large setback from Park Road allows the historic resource to retain its historic setting to a high degree, maintaining the oblique view of the Park Road façade and lobby wing as they were historically viewed from the public right-of-way. Similarly, the setback of the new office lobby at the east end of the Park Road façade, and the hyphen between the historic resource and new lobby, allows the historic resource to continue to read as a separate volume from the new addition which is positioned towards Lorton Avenue and the northeast corner of the parcel.

Therefore, the proposed project is consistent with Standard 2.

**Rehabilitation Standard 3:** *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

*Discussion:* The proposed project does not create a false sense of historical development for the former post office building as the addition and proposed changes are suitably differentiated in style and materials. The project will not add conjectural features or design elements. In areas of historic significance, the treatment of the historic resource is that of a rehabilitation, repairing damaged material and replacing material in kind when necessary. In areas where extensive damage necessitates replacement, features will be recreated using documentary evidence and will not be conjectural. Therefore, the proposed project is consistent with Standard 3.

**Rehabilitation Standard 4:** *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

*Discussion:* The historic resource's period of significance is 1942, dating to the year that the building was completed. Changes to the subject building since its completion in 1942 have been relatively minor and no changes to the subject building that have occurred since its construction have gained historic significance in their own right. Non-original features that have been added since the building's construction will be removed as they are not considered significant. The removal of non-original features, such as the plasterboard carousel within the historic lobby, will restore the lobby to its original open volume. Therefore, the proposed project is consistent with Standard 4.

**Rehabilitation Standard 5:** *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

*Discussion:* The materials, features, finishes, and construction techniques that characterize the former post office building will largely be retained. On the exterior, these features include the building's stucco cladding, sculptural relief tiles, multi-lite metal entrance doors with decorative transom and surround, multi-lite metal windows, entry terrace with flagpole, and clay tile roof. The physical fabric of these exterior features is being retained along the primary (southwest) Park Road façade and the northwest façade. As described in the discussion of Rehabilitation Standard 2, while the character-defining features on Lorton Avenue are either being demolished or salvaged and reinstalled in new locations, the materials of the primary Park Road façade and the northwest façade will remain largely intact.

While moving a historic structure is generally not considered to be a preferred treatment by the Standards, when associated construction requirements pose a danger to the integrity of the historic resource, moving the building temporarily can help to safeguard the resource. In this case, moving the building will protect the former post office from vibration, excavation, and subsidence risks as the proposed below-grade parking are excavated and foundations erected. A preservation architect, who will be retained by the project team, will assist with the design, planning, and implementation of the building's temporary relocation. The three sections of the historic resource will be returned to their exact historic location and will be reassembled, with careful repair to the areas that had been cut apart. The historic resource, once reassembled, will retain its grading, orientation, and historic landscaping in order to convey its historic relationship to the street. As long as adequate protective treatments and methods are undertaken to protect the resource when it is moved, and it is returned to its exact historic location, the proposed project will retain those features that characterize the property – namely its character-defining features – which make it eligible as a historic resource. While interior material of the office wing, including roof and floor structures will be removed and later reconstructed in new materials, this area did not contain any character-defining features and the appearance and materiality of the historic former post office will remain intact.

Historic materials of the interior, including the marble wainscoting, historic post office boxes, service windows with bronze grilles, and wall-mounted desks will be retained and illustrate the care and craftsmanship that was invested in the creation of this 1942 post office.

As the vast majority of the building's materials, features, and finishes will be retained, the building will continue to express its association with the New Deal era and the craftsmanship, historic character, and design that marks that era of post office construction. Therefore, the proposed project is consistent with Standard 5.

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

*Discussion:* Historic features and materials of the historic resource will be repaired as needed and replaced in kind when necessary. Salvaged material in areas of selective demolition along the southeast and Lorton Avenue façades of the building will provide additional historic material for the repair of deteriorated features. Additionally, in areas where extensive damage necessitates replacement, features will be recreated using documentary evidence and will not be conjectural.

Due to the need to temporarily move the historic resource off-site during the excavation of the site, the entrance stairs along Park Road will be disassembled, cleaned, labelled, and stored for future reinstallation. When the former post office is returned to its historic location, the cast stone entrance stairs will be reinstalled, thereby retaining original materials. Any damaged elements that must be replaced will be replaced in kind or with material salvaged from the matching Lorton Avenue entrance stairs. In addition, the areas along the exterior facades of the office wing that will be cut to allow the building to be partially disassembled and moved off-site, will be repaired once the building is reassembled in its historic location. The cuts which will be made parallel to Park Road along the southeast-facing wall and the northwest-facing wall are placed to minimally impact the building's decorative and character-defining features, and will sensitively treat the decorative molding return along both of these façades. When reassembled, the locations of the cuts will be repaired and finished in painted stucco to match the existing cladding of the historic structure, allowing the building walls to maintain their historic design as a monolithic structure.

Areas along the interior of the office wing that will be demolished prior to the disarticulation of the exterior walls will be replaced with modern materials but will be chosen to match the design and materiality of the space. While the structure of the gable roof will be of new construction, the visible portion of this element – the exterior roof cladding – will consist of the original clay tile roofing, which will be reinstalled, and the roof form will match the historic pitch and dimensions of the original roof. From the exterior, the Park Road façade will retain its historic appearance and materiality and will retain all character-defining features.

Additional character-defining features of the historic resource will be retained and protected during the construction of the addition. These features will be repaired, if necessary. Therefore, the proposed project is consistent with Standard 6.

**Rehabilitation Standard 7:** *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

*Discussion:* Repair work to the historic resource – including to its exterior stucco cladding, clay tiles, decorative reliefs, historic windows and doors, and various features of the historic lobby including its marble wainscoting, historic bronze features, historic lamps, and built-in furnishings – may involve a variety of treatments, depending on the condition of the materials. If it is necessary to propose chemical or physical treatments, these methods will not involve the use of harmful treatments that would damage the historic elements and will follow the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties*. The project team will retain a preservation architect who will guide the physical treatments of the historic resource and its character-defining features. If surface cleaning of the building and its historic materials is determined to be necessary, such cleaning will



be undertaken using the gentlest means possible and will also follow the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties*. Provided that all treatments are undertaken using the gentlest means possible, the proposed project is consistent with Standard 7.

**Rehabilitation Standard 8:** *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

*Discussion:* The proposed project will involve excavation of the site for the creation of two levels of below ground parking. If any archaeological material is discovered during this process, provided that standard discovery procedures for the City of Burlingame are followed, the proposed project is consistent with Standard 8.

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

*Discussion:* The new addition is designed in a contemporary style to remain differentiated from the historic structure, while complementing the historic resource through a reference to Art Deco style massing and the treatment of windows and spandrel panels that are slightly recessed and vertically grouped. Additionally, the use of precast concrete as a cladding material was chosen for its similar properties and aesthetic to stucco, yet remains differentiated through its color and texture. While the new addition is at a larger scale than the historic resource, its articulation is referential to that of larger New Deal era post office structures, and its overall mass is located as far to the northeast of the parcel as possible, moving the larger mass of the addition towards Lorton Avenue and away from the historic resource, as though it were a separate building located on Lorton Avenue.

Locations where the historic resource meets the new addition are limited to the north end of the historic resource's northwest façade (containing the historic lobby) and the east end of the Park Road façade where a new lobby for the addition will be constructed. In both locations the addition is suitably differentiated from the historic resource.

At the northwest façade, the addition meets the former post office with a perpendicular southwest-facing wall that consists of precast concrete along the first floor that is differentiated in texture and color from the stucco of the adjacent historic resource. The second floor of the addition features a large section of glazing over an exposed steel beam, and the upper stories continue the overall glazing pattern of the main portion of the new addition. The solid ground floor wall may be used to solicit a public art piece that would complement the original role of public art within the federal post

office building program of the New Deal era. The addition of a new public art piece on the site further complements the historic intent of the site as a mural was originally intended to be included within the Burlingame Main Post Office but was eliminated due to budgetary limitations during construction.

The new lobby to be built at the east (right) end of the Park Road façade will be visually and physically separated from the historic building through the presence of a small setback section – or hyphen – that allows for the full view of the southeast-facing wall of the historic office wing. The lobby itself will consist of a modern fully glazed façade set between cast concrete side walls, and the front plane of the lobby will be setback approximately 22'-9" from the front plane of the historic resource, ensuring that the former post office retains its visual prominence along Park Road. As such, the new addition is both differentiated and compatible in design and materials and protects the integrity of the historic resource through its sensitive treatment of the primary façade along Park Road and the areas where the historic resource and the new addition meet.

Therefore, the proposed project is consistent with Standard 9.

**Rehabilitation Standard 10:** *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

*Discussion:* The design of the proposed project aims to leave the massing, design, and features of the primary Park Road façade of the historic resource and its northwest façade intact, maintaining the traditional pedestrian view of the historic resource as viewed from Park Road and seen in historic photographs of the building. While a large six-story addition is proposed to be appended to the rear of the historic structure and requires the demolition of portions of the historic resource, the placement of this addition was strategically located to be sensitive to the primary façade of the historic resource. The new office lobby to be constructed at the east end of the Park Road façade is attached to the historic resource via a small setback – or hyphen – that retains the full oblique view of the administrative wing along the primary Park Road façade. If, in the future, the addition was to be demolished, the historic resource would substantially retain its essential form and integrity. While the northern end of the lobby wing (the northwest façade) will be removed, somewhat affecting the overall massing of the structure in its symmetry along this façade, the most significant spaces of the resource would remain and would allow the building to continue to express its significance and character-defining features.

The proposed treatment of the interior lobby and entrance vestibule, as separate from the new addition, ensures that in the future changes to the addition – including its removal – would allow these significant interior spaces to remain intact.

While the project requires the demolition of a large amount of original fabric along Lorton Avenue, the rear sorting and loading areas, and along the interior of the office wing, these locations were not found to hold character-defining features and the project as a whole successfully retains the key spaces, features, massing, and characteristics of the resource such that it substantially meets the requirements of Standard 10.

### Summary of the Secretary of the Interior's Standards Analysis

As the above analysis illustrates, the proposed project for the former post office building at 220 Park Road, as currently designed, appears to be in full compliance with Standards 1 through 9 and substantially in compliance with Standard 10. Thus, the former post office building would retain integrity and continue to be able to express the features, design, and context that make it eligible for listing or designation on the National Register, the California Register, and the local City of Burlingame Historic Register. As the proposed project is in overall compliance with the Standards for Rehabilitation, it appears to meet the protective intent of the Preservation Covenant.

## V. CONCLUSION

The former Burlingame Main Post Office property at 220 Park Road has been found eligible for the National Register under Criterion A (Events) and Criterion C (Architecture) and has been found eligible for listing on the local Burlingame Historic Register through survey evaluation. The historic resource illustrates the reach of the federal post office building campaign that was undertaken during the New Deal era – ranging from 1933 to the beginning of World War II – and the building is a good example of the use of the Spanish Eclectic (or Spanish Colonial Revival) style and the Art Deco style as employed by architect Ulysses Floyd Ribble to meet the requirements of standardized post office construction, while integrating locally popular styles. When the historic post office was sold by the USPS in 2014, a Preservation Covenant was attached to the property to guide the future preservation of the building.

Although the proposed project results in a change to the Lorton Avenue façade of the historic resource through its wholesale demolition, the language of the Preservation Covenant provides further guidance for the interpretation of the Standards and allows for more change to occur along Lorton Avenue, recognizing that the Park Road façade is the more significant and primary façade. Through this guidance, the salvage and relocation of historic elements of the Lorton Avenue façade is considered acceptable as long as the primary Park Road façade retains its character-defining features, which include its historic materials, decorative features, and historic massing. The rehabilitation of the historic primary façade, the historic lobby and entrance vestibule, and the northwest façade allow the building to communicate its historic significance as a New Deal era post office.

The proposed project was evaluated according to the Secretary of the Interior's Standards for Rehabilitation and was determined to fully comply with Rehabilitation Standards 1 through 9, and to be substantially in compliance with Standard 10. The building will continue to retain sufficient historic integrity to remain eligible for listing on a local, state, or national register. Therefore, the proposed project has been determined to substantially comply with the Standards and the guidance of the Preservation Covenant.

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- United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language."

### Archival Material

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### Project Drawings

Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal." Proposed Project renderings and plan set. Dated October 14, 2020.

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### Internet Sources

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## **VII. APPENDIXES**

### **APPENDIX A – PROJECT DRAWINGS**

Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal."  
Proposed Project renderings and plan set. Dated October 14, 2020.

## APPENDIX C – PRESERVATION COVENANT

United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language."  
2014.



## PRESERVATION COVENANT

### **220 Park Road, Burlingame, CA** **PRESERVATION COVENANT LANGUAGE**

In consideration of the conveyance of certain real property, located at 220 Park Road in the City of Burlingame, the County of San Mateo, State of California.

- (1) The grantee hereby covenants on behalf of itself, its heirs, successors and assigns at all times to restore, maintain, preserve or rehabilitate the historic character defining features of this property as described in Paragraph 2 in accordance with the recommended approaches of the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings" (National Park Service, 1995), in order to preserve those qualities that make the property eligible for listing on the National Register of Historic Places.
- (2) No construction, alteration or rehabilitation shall be undertaken or permitted to be undertaken that would affect the historic features of the property without prior consultation with, and the express permission of the California Office of Historic Preservation, Department of Parks and Recreation ("SHPO") or a fully authorized representative of the City of Burlingame ("City"). For purposes of this section, the "main" façade of the Post Office building shall be that portion of the building exterior that faces Park Road, including the exterior stair massing, building entry elements and the non-public, administrative wing that extends southerly along the frontage of the property on Park Road. "Secondary" façade shall mean that portion of the building exterior that faces Lorton Avenue, including the exterior stair massing, building entry elements and the non-public administrative wing that extends southerly along the frontage of the property on Lorton Avenue. The historic exterior features of the property are determined to be the following: overall mass and plan of the main (Park Road) façade of the post office; poured concrete exterior siding and smooth stucco wall cladding; original metal frame windows; original bronze doors; red clay tile roof; cast stone Art Deco relief sculptures over the main entrances and under the windows; and bronze relief of a woman over the entrance doors. Though the same exterior features on the main façade exist on the secondary (Lorton Avenue) façade, the historic primary entry to the building is from Park Road. For this reason, proposals for construction, alteration or rehabilitation of the property that affect the historic features of the Park Road façade are to be viewed with a more critical eye (pursuant to the Secretary of Interior Standards). There may be greater latitude for modifications to the Lorton Avenue façade that still retain the essence of the historic exterior features (e.g. modification of spatial relationships among identified character defining features or relative to the street frontage, relocation of features, replication, or similar design approaches that are consistent with the Secretary of Interior Standards). The historic character defining interior features of the property are determined to be the following: original hanging ceiling light fixtures; marble

wainscoting, including marble on vestibule walls; metal trim used throughout the interior: including metal grill work on the northwesterly wall of the lobby near the tall tables used by post office patrons (but not including non-metallic grillwork above the service windows); original tall tables used for post office patrons; original service windows; original bronze bulletin board; Federal star motifs; terrazzo flooring; original windows and doors to and within lobby; cantilevered service desks; original post office boxes; and original built-in lobby furniture, such as tables. Historic character defining interior features shall not include: the plasterboard "carousel" located near the Lorton Avenue entry, across from the post office boxes; the acoustic tiles placed in areas above the wainscoting and in the ceiling area of the public lobby area; the plaster finish applied to the ceiling within the public lobby area; fluorescent light fixtures installed above the tall tables used by post office patrons; interior finishes and detailing within non-public areas of the building interior (i.e. sorting area, administrative office area and other "back-of-house" functions of the post office.

- (3) Authorized representatives of the SHPO and the City shall be permitted at all reasonable times to inspect the property in order to ascertain if the above conditions are being met.
- (4) In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the SHPO and/or the City or any resident of the City of Burlingame having an interest in the historic character defining features of the property identified in Paragraph 2 above may, following reasonable notice to the grantee, institute suit against the property owner and/or developer to enjoin said violation or to require the restoration of the property. Such suit must be instituted within any applicable statute of limitations for the action or approval being challenged.
- (5) This covenant is binding on the grantee, its heirs, successors and assigns in perpetuity. All stipulations and covenants contained herein shall be inserted by the grantee verbatim or by express reference in any deed or other legal instrument by which the grantee divests itself of any interest in the property or any part thereof.
- (6) The failure of any person or entity permitted by the terms hereof to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or use of such right or remedy at any other time.
- (7) This covenant shall be a binding servitude upon the property and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence that the grantee agrees to be bound by the foregoing conditions and restrictions and to perform to obligations herein set forth.
- (8) The SHPO or the City may, for good cause, and following notice to the public, modify or cancel any or all of the foregoing restrictions upon application of the grantee, its heirs, successors or assigns.





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