



582 MARKET ST. SUITE 1800  
SAN FRANCISCO, CA 94104

T: 415.391.9633  
F: 415.391.9647

[www.garavaglia.com](http://www.garavaglia.com)

## MEMORANDUM

**Date:** October 20, 2022

**To:** Group 4 Architecture, Research + Planning, Inc.  
ATTN: Jonathan Hartman  
211 Linden Avenue  
South San Francisco, CA 94080

**From:** Kathleen McDonald, Conditions Assessment Specialist/ Architectural Historian

**Project:** 201 Baden Avenue  
GA Job #2019019

**Re:** Standards Compliance Review – 201 Baden Avenue, South San Francisco

**Via:** [jhartman@g4arch.com](mailto:jhartman@g4arch.com)

Dear Jonathan,

Garavaglia Architecture, Inc. (GA) has been retained by Group 4 Architecture, Research + Planning, Inc. (G4) to provide guidance on the compliance of proposed alterations to the building at 201 Baden Avenue, South San Francisco, with the Secretary of the Interior's Standards for Rehabilitation. Such a review has been requested by the City of South San Francisco Planning Department because the 201 Baden property has been determined as individually eligible for listing on the California Register of Historic Resources (CRHR) and is considered a historic resource under the California Environmental Quality Act (CEQA). This determination of eligibility was made as part of a Historic Resource Evaluation undertaken by GA in 2019. Proposed project drawings and plans, dated October 7, 2022, were provided for review.

The building at 201 Baden Avenue was designed by architect William Henry Rowe in 1949 for use as a fire station. It was known as Fire Station 61, and later as Central Station. It has been determined eligible for listing on the CRHR under Criterion 1: Events because its "construction in 1949 reflects the growth of the City of South San Francisco during the early twentieth century as industry and commerce, and a growing population, required extension of municipal services."<sup>1</sup> It has also been noted as eligible under Criterion 3: Architecture, "as a building that embodies the distinct characteristics of a modern fire station typology rendered with elements of the International style, constructed in 1949 in South San Francisco."<sup>2</sup>

---

<sup>1</sup> Garavaglia Architecture, Inc., *201 Baden Avenue, South San Francisco, CA: Historic Resource Evaluation* (2019).

<sup>2</sup> Ibid.

## PROJECT INFORMATION

### Site and Building Description

The subject .52-acre site is rectangular in shape and consists of three parcels: APN 012-335-100; APN 012-335-110; and an adjoining, un-numbered parcel, in downtown South San Francisco. The site is bound by Baden Avenue (north) and 2nd Lane (south). A multi-story Giorgi Bros. furniture store is situated on the neighboring parcel to the west, and a restaurant building is situated on the neighboring parcel to the east. The subject site contains a former fire station building, a driveway off of Baden Avenue at the east, and a parking lot at the rear.<sup>3</sup>

The fire station is a reinforced-concrete building comprised of three volumes of varying height, including: a one-story east volume, two-story west volume, and a five-story drill tower. All volumes have flat roofs covered with composition materials. The three volumes combine to form an L-shaped plan, with the drill tower situated south (rear) of the intersecting east and west volumes (**Figure 1**).



**Figure 1.** Aerial view of subject property outlined in red, with building highlighted in yellow and building volumes labeled (Google Maps, amended by author).

The exterior is finished with painted, architectural concrete and minimally adorned with fluted concrete piers between window bays and fluted concrete cornices. All window openings are rectangular and contain single, paired, or tripartite arrangements. Within the west volume and east volume, windows are primarily replacement, anodized-aluminum units with operable awning lites, referred to as “replacement windows” hereafter. The west wall of the apparatus bay at the first story of the west elevation, and the south wall of the maintenance bay at the first story of the south elevation retain original steel windows. The drill tower is fenestrated with original, operable (hinged) steel-casement windows containing eight lites of wired glass each. Entrances and the building’s central stairwell are lighted additionally by original glass block grids set into aluminum frames. Entry doors are flush wood with aluminum frames. Additional

<sup>3</sup> Acreage estimated sourced from CSS Environmental Services, Inc., *Environmental Site Assessment: 201 Baden Avenue, South San Francisco, California-CSS Project No: 6527*, (South San Francisco: City of South San Francisco Department of Economic and Community Development, November 20, 2017).

features include a tall radio tower mounted to the roof. All roof planes are flat and are surrounded by shallow concrete parapets.

### **Character-Defining Features**

GA identified character-defining features as part of the HRE in 2019. Each was assigned a priority rating of “Premier-Important-Contributing-Non-Contributing” to create a sense of the relative historical importance of spaces and features. In general, this system allows for the analysis of the structure as a whole, to guide what types of work should be done, and where such work could be completed with the least damage to the historic integrity of the resource.

The character-defining features of the property at 201 Baden Avenue, include:

#### *Primary*

- Massing (east wing, west wing, and drill tower at rear)
- Architectural concrete exterior
- Fluted concrete details at concrete piers and along cornice line
- Three apparatus bays (dimension of apparatus bays exclusive of replacement doors)
- Glass block door surrounds
- Steel casement windows in drill tower
- Steel windows at additional locations
- Windows set into banks or ribbons creating a horizontal emphasis

#### *Important*

- Glass block stairwell window at drill tower exterior
- Curved concrete columns and wheel guards at apparatus bays
- Front, recessed entrance
- Rear entrance beneath curved canopy

#### *Contributing*

- Canopy with curved ends over apparatus bays
- Flat roofs
- Flush-wood doors

#### *Non-Contributing*

- Apparatus bay doors (previously altered)
- Replacement aluminum windows installed ca. 1968<sup>4</sup>

### **Project Summary**

The project under review proposes to re-purpose the old Firehouse for an office space. The overall scope of work includes associated site work for surface parking, pathways, and landscaping, replacing overhead doors with storefront, painting, new building and code signage, and outfitting the interior to create a multi-tenant office space with shared facilities.

Specific alterations include:

---

<sup>4</sup> Garavaglia Architecture, Inc., 201 Baden Avenue, South San Francisco, CA: *Historic Resource Evaluation* (2019).

- Removal of all non-historic roll-up doors on the apparatus bays (north and east facades); replacement with aluminum storefronts with mullion patterns that are evocative of the historic doors
- Removal of two historic steel windows on the south facade due to deterioration; replacement with aluminum storefronts with matching mullion patterns
- Infill of four doors on the south facade
- Infill of windows on the east and west facades; infill would be shallower than the exterior wall plane to show relief
  - Infill of one of the three aluminum replacement windows on the single-story portion of the east facade due to proximity to the property line
  - Infill of one of the historic steel windows on the first floor of the west facade for structural reasons
  - Possible infill of three other historic steel windows on the first floor of the west facade due to the location of the trash enclosure\*
- Construction of a ramp leading up to the front entrance for ADA access; the ramp would be parallel to the facade; the original steps to the front door would remain
- Construction of a lean-to trash enclosure on the west elevation

\*The provided set of plans does not indicate the infill of these three windows, but it was brought to GA's attention by G4 that this may be a possibility. For the purposes of this review, it was assumed by GA that these three windows are to be infilled, and they are addressed as such in the following discussion.

## APPLYING THE STANDARDS FOR REHABILITATION TO 201 BADEN AVENUE

### Compliance

The Secretary of the Interior's Standards for Rehabilitation lists 10 key elements to consider when new uses or architectural modifications are undertaken within historic resources. The following presents these 10 standards and briefly discusses the level of compliance of the proposed project at 201 Baden Avenue, South San Francisco. For each Standard, a level of compliance is given: Compliant, Marginally Compliant, or Not Compliant. A *compliant* rating indicates that the alteration has little or no impact on the resource. A *marginally compliant* rating indicates that the overall historical significance of the resources is not impacted enough to warrant re-evaluation, but modifications to the proposed design are strongly recommended. *Not compliant* indicates that the proposed design would severely negatively impact the resource and its eligibility for formal listing on a local, state, or national inventory.

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

The building has not been used as a fire station as it was historically since 2006. Since then, it has been used for storage.<sup>5</sup> The project under review proposes to convert the building into a multi-tenant office space. The conversion to office spaces would require minimal changes to the character-defining features of the building, including the infill of select windows and doors, replacement of existing non-contributing apparatus bay

---

<sup>5</sup> Everything South City website, "SSF City Council Approves Sale of Old Baden Avenue Fire Station for Mixed-Used Development Including Affordable Housing for Seniors," <https://everythingsouthcity.com/2021/11/ssf-city-council-approves-sale-of-old-baden-avenue-fire-station-for-mixed-used-development-including-affordable-housing-for-seniors>.

doors, replacement of two deteriorated historic steel windows, and the installation of an ADA ramp leading to the front entrance of the building.

Overall, the proposed project is compliant with Standard 1.

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

The property at 201 Baden Avenue was determined eligible for listing on the CRHR under Criterion 1 (Events). This is due to the building's association with the development of modern municipal services and civic buildings in the City of South San Francisco, and because it was the City's first purpose-built fire station, originally known as Central Station. This association will not be affected by the new design and the building will retain eligibility under Criterion 1.

201 Baden was also determined eligible for listing on the CRHR under Criterion 3 (Architecture). The building's eligibility was determined based on its concrete structure, restrained ornamentation, and distinct massing that embody characteristics of the fire station typology that evolved from early high-style urban fire houses, to more utilitarian examples completed during the mid-twentieth century, that accommodated larger fire engines, hose drying and drill towers, and space for staff. The project under review does not propose any changes to the building's concrete structure, restrained ornamentation, or overall massing.

The proposed project calls for the infill of select windows and doors. Infill of windows would include both replacement aluminum windows and historic steel windows. While the aluminum windows themselves are not contributing, the window openings and horizontal banks of windows are historic character-defining features. The historic steel windows proposed for infill are primary character-defining features, though they are not on a primary elevation. None of the doors that are proposed for infill were found to be character-defining features in GA's HRE for the property.

On the interior, the primary interior space indicative of the building's original use as a fire station – the apparatus bay – would remain open. The use of storefronts with mullions to mimic the pattern of the apparatus bay doors would help to retain and evoke the historic feeling of the space. The existing wood apparatus bay doors are not historic, but the proposed approach to this significant space supports the building's historic nature. The drill tower would remain intact on the exterior, although its interior would be used for storage and restrooms on the basement and first floors, respectively. The fire poles, which would have been features indicative of the building's original use, were already removed sometime before 2019.

The proposed project is marginally compliant with Standard 2, due to the proposed removal and infill of select windows.

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

As proposed, the project does not include the addition of any conjectural features or architectural elements from other buildings. Replacement windows and apparatus bay doors would replicate the mullion patterns and panel configurations of the existing as

closely as possible. The proposed trash enclosure on the west facade would allow the historic building form to be read and would still being compatible with the original design.

The proposed project is compliant with Standard 3.

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

The building was purpose-built as a fire station in 1949. According to building permits, no major alterations were done to the building between 1976 and 2000. Sometime before GA began work on the HRE in 2019, several alterations had been made, some of which were not indicated on building permits. Alterations made before 2019 include replacement of the original roll-up apparatus bay doors, replacement of some historic steel windows with aluminum units, removal of the station's fire poles at the interior, boarding over or infilling of select windows and doors at the rear of the building, and removal of an oil fire test pit once located at the southeast corner of the site.<sup>6</sup>

GA's HRE found the existing wood roll-up apparatus bay doors and aluminum windows that replaced the historic features to be non-contributing. Therefore, the current proposal, including the replacement of the apparatus bay doors and the infill of one aluminum replacement window, would not be changing any added features that have acquired historic significance in their own right.

The proposed project is compliant with Standard 4.

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

201 Baden's historic steel windows and windows set into banks or ribbons to create a horizontal emphasis were determined to be primary character-defining features of the building. The proposed project calls for the infill of select windows that would include both replacement aluminum windows and historic steel windows. While the aluminum windows themselves are not contributing, the window openings and horizontal banks of windows are historic character-defining features.

It should be noted that the project under review does propose to refurbish most of the historic steel windows, including the steel casement windows on the drill tower. Only two would need to be replaced due to deterioration, and four on the west side of the main apparatus bay would be infilled. The historic steel windows proposed for replacement or infill are primary character-defining features, though they are not on a primary elevation.

Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize the property would be retained through the massing, architectural concrete exterior and detailing, glass block door surrounds, and remaining steel windows and horizontal window bands.

---

<sup>6</sup> Garavaglia Architecture, Inc., 201 Baden Avenue, South San Francisco, CA: *Historic Resource Evaluation* (2019).

The proposed project is marginally compliant with Standard 5, due to the proposed removal and infill of select windows.

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

The only deteriorated historic features proposed for replacement are the two steel windows on the south facade. Replacement for these windows is proposed due to extreme deterioration. Replacements would match the old in design and visual quality, but the proposed material is aluminum, rather than steel. Although the proposed material is not an exact match, it is still metal, and matching material is not expressly required by this standard.

The majority of the other remaining historic steel windows would be refurbished, and a select few are proposed to be infilled (as discussed above).

The proposed project is compliant with Standard 6.

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

Retention of existing finishes should be undertaken during construction. Use of compatible new materials is recommended to prevent cracking at the juncture between new and old finishes.

As proposed, the project is compliant with Standard 7.

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

No known archeological finds have been made in the area. However, should materials be found during construction, a qualified archeologist should be consulted for assessment and mitigation recommendations.

Based on available information, the proposed project is compliant with Standard 8.

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

Replacement windows and apparatus bay doors would replicate the mullion patterns and panel configurations of the existing as closely as possible. While a certain level of similarity is needed for a cohesive design, differentiation between the new and the old is recommended. Differentiation between new and old is provided through the use of aluminum rather than steel for replacement windows.

Select windows need to be infilled due to structural or code issues; infill would include both aluminum replacement windows and historic steel windows. Although the infill

would result in the loss of historic windows and window openings, the proposed infill of windows would be inset slightly, so that the location of the historic window openings is evident. The historic steel windows proposed for infill are also not on a primary elevation.

The proposed trash enclosure on the west facade allows the historic building form to be read while still being compatible with the original design. It is differentiated by its smaller scale and use of materials. However, the location of the trash enclosure would necessitate the removal and infill of three historic steel windows. It is unclear if this would be done due to structural or aesthetic issues.

As proposed, the project is marginally compliant with Standard 9, due to the infill of historic window openings and the removal of historic steel windows.

10. *New additions and adjacent or related new construction shall 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.*

If removed in the future, the proposed trash enclosure on the west elevation and the proposed ramp on the front (north) elevation would not diminish the historic significance of the property in terms of the seven aspects of integrity. The overall massing, scale, materiality, and design would be unimpaired by the proposed new additions. No other new additions or new construction are proposed at this time.

The proposed project is compliant with Standard 10.

### **Project Compliance Summary**

The proposed project at 201 Baden Avenue is compliant with Standards 1, 3, 4, 6, 7, 8, and 10 and it is marginally compliant with Standards 2, 5, and 9. Overall compliance is not necessarily a direct sum of the level of compliance with each individual standard, however that information is weighed with the overall impact on both the design and historical significance of the resource. Depending on the reasons for significance and the level of importance of the resource, different levels of overall compliance may result. For 201 Baden Avenue, Garavaglia Architecture, Inc. finds the proposed project to be compliant overall.

Inclusion of a minor modification is suggested to decrease the impact on the historic resource and raise its proposed design into compliance with the Secretary of the Interior's Standards.

### **Suggested Modification to Proposed Project**

#### *Proposed Infill of Steel Windows*

The proposed infill of the three historic steel windows next to the proposed trash enclosure should be avoided if possible. It is unclear if this would be needed due to structural or aesthetic purposes. If based on structural issues, this should be noted, and the proposed infill of the three windows in question should be indicated on the final drawing set. If solely based on aesthetic reasons, the necessity for infill should be re-evaluated and reconsidered by the architect so that the building might retain as many historic windows as possible.

### **Conclusion**

Garavaglia Architecture, Inc. concludes that the proposed project at 201 Baden Avenue is compliant with the Secretary of the Interior's Standards for Rehabilitation. The majority of character-defining features, such as the distinctive massing, architectural concrete exterior, glass



block door surrounds, and most of the remaining historic steel windows would be retained by the proposed project. More careful consideration of the infill of three historic steel windows on the west facade could bring the project more fully into compliance with the Standards.

## **Professional Qualifications**

*Kathleen McDonald*

Ms. McDonald is a conditions assessment specialist and architectural historian with a solid background in historic preservation, materials investigation, and historic documentation.

Ms. McDonald's experience includes existing conditions analysis, treatment recommendations based on the Secretary of the Interior's Standards, and documentation and identification of historic resources through field surveys and archival research. Her work at Garavaglia Architecture to date has included involvement with historic structure reports and multiple conditions assessments.

Ms. McDonald's educational background includes a Master of Historic Preservation and a Bachelor of Design in Architecture from the University of Florida. She meets or exceeds the Secretary of the Interior's Professional Qualifications Standards for Architectural Historians.

cc: Jay Manzo – Group 4 Architecture, Research + Planning, Inc.  
Elizabeth Rajphackdy – Group 4 Architecture, Research + Planning, Inc.

file: 000-Architecture-NAS:2019019 - 201 Baden Ave HRE:Reports:SISR:201 Baden  
SISR\_DRAFT.doc