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## Historic Resources Board Staff Report

**From: Planning and Development Services Director**  
**Lead Department: Planning and Development Services**

**Meeting Date: June 12, 2025**  
Report #: 2506-4762

### **TITLE**

Public Hearing / Quasi-Judicial. 411 Kipling Street [24PLN-00292]: Request for a Floor Area Bonus Application to Grant 2,500 Square Feet of Bonus Floor Area for Accessibility Upgrades and the Rehabilitation of an Existing Category 2 Historic Resource. Environmental Assessment: Exempt from the Provisions of The California Environmental Quality Act with CEQA Guidelines Section 15301 (Modifications to Existing Facilities). Zone District: CD-C (P) - Downtown Commercial with Pedestrian Shopping Combining District.

### **RECOMMENDATION**

Staff recommends that the Historic Resources Board (HRB) take the following action:

1. Discuss and provide a recommendation to the Director of Planning and Development Services on project's conformity with the Secretary of the Interior's Standards for Rehabilitation.

### **EXECUTIVE SUMMARY**

On October 16, 2024, the owner Thoits Bros. Inc. (via Hayes Group Architects) submitted a request for 2,500 square feet of historic bonus floor area for accessibility upgrades and rehabilitation of 411 Kipling Street (APN 120-15-023), a mixed-use two-story building currently listed as a Category 2 resource on the City's Historic Inventory.

On April 17, 2025, Hayes Group Architects submitted a revised project and plans. On May 12, 2025, the City's consultant, Page & Turnbull, prepared a Secretary of the Interior's (SOI) Standards Compliance Memorandum (Attachment B). The memorandum found the project consistent with the SOI Standards for Rehabilitation, as summarized in this report.

The HRB is requested to review the application and provide a recommendation to the Director of Planning and Development Services on the project's conformity to the SOI Standards for Rehabilitation.

## PROJECT DESCRIPTION

The following project description is based on the project plans submitted on April 17, 2025 (Attachment C).

The project includes the following accessibility upgrades:

- Demolish existing non-historic front stairs and replace with narrower wood stairs and cheek walls with wood shiplap cladding and accessible metal handrails.
- Demolish existing non-historic rear wood deck and stairs, and replace with new tiered rear deck and stairs with accessible metal handrails.

The project includes the following Rehabilitation work:

- Demolish existing wood fence and gate at southeast side of property, and replace with new wood fence and gate with horizontal slats.
- Remove non-historic door at rear façade and replace with new glazed wood door.
- Remove non-historic aluminum windows and siding at rear façade, and replace with new wood sliders and wood shiplap siding.
  - Rehabilitate existing wood-sash windows and doors Repair to be undertaken in accordance with *Preservation Brief 9: The Repair of Historic Wooden Windows* and *Preservation Brief 10: Paint Removal from Historic Woodwork*.
  - Routine maintenance to include paint removal, removal and repair of sash including reglazing where necessary, repairs to the frame and operating hardware, and repainting.
  - Repair exterior wood components as needed based on evaluation of existing condition, including railings, columns, decking, and ceilings of the front porch; siding, cornices, window and door casings and surrounds; and other functional and decorative elements Remove damaged or deteriorated paint using the gentlest method possible prior to repainting.
  - Repair of wood elements may include patching, splicing, consolidating, and reinforcement using recognized preservation measures, and limited replacement in kind of extensively deteriorated features, missing components, or when replacement can be based on documentary of physical evidence .
  - New work shall match the old in material, design, scale, color, and finish.

Additional areas of work include:

- Patching exposed concrete foundation.
- Remove and replace a large non-original light fixture on front porch with a smaller globe light.
- Remove existing HVAC unit and install new electric HVAC unit.

## **BACKGROUND**

### Palo Alto Historic Inventory

411 Kipling Street is listed as a Category 2 (“Major Building”) historic resource on the local Historic Inventory. The property was previously listed as a Category 4 (“Contributing Building”) historic resource, but its historic status was elevated following completion of a Historic Resource Evaluation (HRE) by Page & Turnbull in November 2023. Upon the HRB’s recommendation, City Council reviewed and approved the findings of the HRE, elevating the building from Category 4 to Category 2 on September 9, 2024.

A Category 2 is defined as: “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 2 historic properties require historic preservation project review.

### Site Development

411 Kipling Street is located on a parcel that is 40 feet wide by 112.5 feet deep and within the Downtown Commercial Community (CD-C) District with a Pedestrian Combining District (P). The property includes a one-and-a-half-story residential building currently used as two commercial units. The one-story building provides a contrast to the larger commercial scale and higher density found on University Avenue and sections of Lytton Avenue and Cowper Streets. The one-story building, then a single-family residence, was built by George W. Mosher in 1902 for Hiland H. Holley, but its first occupants were Mrs. M. M. Baker and Mrs. E. A. Sykes. By 1924, the footprint of the subject property remained the same, but the rear outbuilding was removed. Between 1902 to 1925 the rear addition was added to the house including the wood siding and double-hung sash windows. In 1989, a permit was granted for the construction of new stairs with a railing at the entryway. Since the late 1980s, no other alterations have been documented, and all facades appear unchanged.

### Character Defining Features

Character-defining features are the physical traits that commonly recur in property types and/or architectural styles. The character-defining features of 411 Kipling Street as identified in Attachment A are assumed to be those architectural features and materials that date to the building’s original construction in 1902. These features include, but are not limited to:

- One-and-a-half-story massing
- Hipped roof with wide boxed eave
- Hipped roof dormer with boxed eaves, dentil molding, cottage windows, and diamond mullions
- Plain frieze board and cornice with dentil molding
- Wood shiplap siding
- Wood water table across all facades
- Recessed front porch with solid balustrade and Tuscan columns
- Wood door casings and window frames
- Wood one-over-one double hung sash windows with ogee lugs

## Bonus Floor Area

The Bonus Floor Area /Transfer of Development Rights (TDR) program is available for qualifying rehabilitation projects for local Historic Inventory Category 1 and 2 resources that are:

- a) Zoned CD (Commercial Downtown) as set forth in Palo Alto Municipal Code (PAMC) Chapter 18.18;
- b) Zoned PF/City owned property; or
- c) Zoned Residential Transition (RT-35 and RT-50) in the South of Forest Area Phase 2 (SOFA 2)<sup>1</sup> area.

Further, Palo Alto Municipal Code (PAMC) Section 18.18.070 provides the following for Historic Rehabilitation Bonuses:

*A building that is in Historic Category 1 or 2, and is undergoing historic rehabilitation, but is not in Seismic Category I, II, or III, shall be allowed to increase its floor area by 2,500 square feet or 25% of the existing building, whichever is greater, without having this increase count toward the FAR.*

Pursuant to PAMC Chapter 18.18, an application for such floor area bonus was filed with the Director of Planning and Development Services on October 16, 2024, stating the amount of such bonus applied for (2,500 square feet), the basis therefor under PAMC 18.18.070(a)(3), and the extent to which such bonus is proposed to be used for transfer. The application also included a historic structure report, prepared by a qualified expert, the City's consultant, Page & Turnbull, at the applicant's expense, in accordance with the standards and guidelines of the California State Office of Historic Preservation. The project's compliance with the SOI Standards is detailed in the following section.

Following this hearing, the Director, taking into consideration the recommendations of the HRB, will decide on whether the project conforms to the SOI Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (36 CFR §67,7). A written certification will be issued stating total floor area bonus which is eligible for transfer to another site pursuant to the provisions of PAMC Chapter 18.18. The certification shall be recorded in the office of the County recorder and a copy shall be provided to the applicant.

## **ANALYSIS**

PAMC 16.49.050 provides, in part, that in evaluating applications, the HRB shall consider the architectural style, design, arrangement, texture, materials and color, and any other pertinent factors. The prime concern should be the exterior appearance of the building site. The proposed alterations should not adversely affect the exterior architectural characteristics nor the historical or aesthetic value of the building and its site.

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<sup>1</sup> SOFA 2 webpage link: <https://www.cityofpaloalto.org/files/assets/public/v/1/planning-amp-development-services/file-migration/current-planning/forms-and-guidelines/south-of-forest-coordinated-area-plan-phase-2.pdf>

The following table summarizes the project’s compliance with the SOI Standards for the Rehabilitation of Historic Properties.

#	STANDARDS FOR REHABILITATION	ANALYSIS
1	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> Although the property was built as a residential rental property, it is currently used as two commercial units and has been in use for commercial purposes since the 1980s. This use has not changed the exterior appearance of the building. The proposed project would retain the current use and retain distinctive materials, features, spaces, or spatial relationships.</p>
2	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> The proposed project does not propose to remove or replace any historic features of the building. Proposed work would be limited to the removal and replacement of the existing non-historic features, the in-kind replacement of damaged historic features, and patching, repairing, and repainting existing historic materials as needed based on their current condition. Only non-historic and utilitarian features are proposed for removal, including existing non-historic concrete paths, wood steps, a ceiling light fixture, and a wood handrail at the front (south) entrance; non-historic wood steps, a wood door, aluminum sliding windows at the rear (north) façade; a wood fence and gate at the north side of the property; and exterior electrical and mechanical equipment. Areas of non-original siding, trim, and decking would be replaced to match the original materials. As such, the historic character of the building would be retained and preserved to a high degree. Therefore, the proposed project complies with Rehabilitation Standard 2.</p>
3	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> The project does not propose any changes to the property that would be conjectural, based on features from other historic properties, or which would create a false sense of historical development. Areas of patching or in-kind replacement would be based on the existing materials present on the historic building and would not be conjectural. New features that will be</p>

#	STANDARDS FOR REHABILITATION	ANALYSIS
		<p>installed to replace existing non-historic features – such as the new front steps and cheek walls, side fence, and rear deck, steps, doors, and windows – will have simple, contemporary designs that do not mimic historic designs or features. Therefore, as planned, the proposed project complies with Rehabilitation Standard 3.</p>
4	<p><i>Changes to a property that have acquired historic significance in their own right will be retained and preserved.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> No alterations that occurred after the subject property’s original construction in 1902 have acquired significance in their own right. As discussed under Rehabilitation Standard 2, proposed changes to non-original elements are limited to removing or replacing non-historic or utilitarian features that do not have historic significance. Therefore, as planned, the proposed project complies with Rehabilitation Standard 4.</p>
5	<p><i>Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> As proposed, the project would preserve all of the distinctive features, finishes, construction techniques, and examples of craftsmanship that characterize the early twentieth century Square Cottage style design of 411 Kipling Avenue. The character-defining features of the building which convey the techniques and craftsmanship of its construction include its one-and-a-half-story massing with a hipped roof and boxed eaves; a hipped-roof dormer with boxed eaves, dentil molding, cottage windows and diamond pattern mullions; a plain frieze board and cornice with dentil molding throughout; wood shiplap siding with a wood water table across all façades; a recessed front porch with a solid balustrade and Tuscan columns; wood door casings and window frames; and wood one-over-one double-hung sash windows with ogee lugs. As discussed under Preservation Standard 2, the proposed project would retain all historic features. The only materials or features that will be removed are non-historic alterations. The project would, therefore, maintain the historic character of the building to a high degree. As all original and historic features and examples of craftsmanship would be preserved, the proposed project complies with Rehabilitation Standard 5.</p>

#	STANDARDS FOR REHABILITATION	ANALYSIS
6	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> As proposed, the project would undertake an assessment of all historic wood windows and doors, entrances and porches and associated features, and functional and decorative wood components in order to outline areas of repair. The proposed project would follow the guidance of the National Park Service (NPS) in Preservation Brief 9: The Repair of Historic Wooden Windows and Preservation Brief 10: Paint Removal from Historic Woodwork to ensure that all proposed treatments prioritize repair over replacement. In areas where replacement may be necessary due to the level of deterioration, the project would replace materials or features in kind to match the existing features in look, texture, design, and materials. Therefore, the proposed project complies with Rehabilitation Standard 6.</p>
7	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> The proposed project would use physical treatments recommended by the NPS for cleaning wood and removal of paint on historic wood windows, doors, siding, and other wood components. As the proposed project would follow the provided technical guidance of Preservation Briefs 9 and 10, the proposed project would use the gentlest methods possible. Thus, the project complies with Rehabilitation Standard 7.</p>
8	<p><i>Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.</i></p>	<p><input type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input checked="" type="checkbox"/> N/A</p> <p><u>Explanation:</u> The proposed project would not undertake ground-disturbing excavation work. Therefore, Rehabilitation Standard 8 would not be applicable to the project.</p>
9	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> The proposed project does not include the construction of any new additions to the building. Exterior alterations and new construction are limited to the replacement of existing non-historic features with new features that address accessibility issues. The existing non-historic wood front steps would be replaced with new wood steps that have accessible metal handrails and cheek walls that are clad with wood shiplap siding. The</p>

#	STANDARDS FOR REHABILITATION	ANALYSIS
		<p>new stairs would align with the existing porch opening and would be slightly narrower in width than the existing stairs, so that they are compatible in size, scale, and proportion to the building. The use of wood for the steps and cheek walls would also be compatible with the predominant wood exterior materials of the house, while the use of shiplap siding with subtly different dimensions from the historic wood siding would differentiate the steps as new construction. Non-historic wood steps, a wood door, replacement aluminum windows and vertical wood siding at the rear façade would also be replaced with a new tiered wood deck with accessible metal handrails, a new glazed wood door, wood windows, and new wood shiplap siding. The deck would include a new accessible platform lift at its east side. While the new deck would have a larger footprint than the existing steps, it would be tucked behind the rear façade of the house and would not be visible from the public right-of-way. Similar to the proposed new front steps, its wood construction and use of shiplap siding with differing dimensions from the historic wood siding, would be compatible with and differentiated from the historic wood material palette of the house. The new wood windows and new wood shiplap siding would be more compatible with the historic design of the house than the existing non-historic aluminum windows and vertical wood siding, but would be of a clearly contemporary design. Lastly, the new fence and gate would also be of compatible wood construction, and the horizontal orientation of the wood slats will identify it as a contemporary alteration. As all of the proposed alterations and new construction would only impact non-historic features and the proposed replacements features would be both compatible with and differentiated from historic elements, the historic integrity of the property would be retained and protected. Therefore, the proposed project complies with Rehabilitation Standard 9.</p>
10	<p><i>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.</i></p>	<p><input checked="" type="checkbox"/> CONSISTENT   <input type="checkbox"/> NOT CONSISTENT   <input type="checkbox"/> N/A</p> <p><u>Explanation:</u> Proposed new construction consists of the replacement of non-historic steps at the front and rear entrances with new wood steps at the front entrance and a new wood deck with steps and</p>

#	STANDARDS FOR REHABILITATION	ANALYSIS
		<p>a platform lift at the rear façade, and replacement of an existing wood fence and gate at the east side of the property with a new wood fence and gate. All of the new features could be removed in the future without impacting the essential form and integrity of the property. Therefore, the proposed project complies with Rehabilitation Standard 10.</p>

As the above analysis demonstrates, the project as currently designed complies with the guidance of the SOI Standards for Rehabilitation. The proposed project is consistent with nine of the 10 Standards for Rehabilitation. Standard eight does not apply to the project. As such, the proposed project would be consistent with the Standards and the historic building at 411 Kipling Street would not be negatively impacted by the proposed project and would continue to express its historic significance and integrity.

Therefore, 411 Kipling Street would remain eligible as a Category 2 building on the Palo Alto Historic Resources Inventory. As proposed, the project would be consistent with the SOI Standards for Rehabilitation.

**STAKEHOLDER ENGAGEMENT**

The Palo Alto Municipal Code requires notice of this public hearing be published in a local paper at least ten days in advance of the public hearing. Notice of a public hearing for this project was published in the Daily Post on May 27, 2025, which is 10 days in advance of the meeting.

Public Comments

As of the writing of this report, no project-related, public comments were received.

**ENVIRONMENTAL REVIEW**

The subject project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. Specifically, the project is categorically exempt from the provision of CEQA in accordance with the Class 1 (Existing Facilities) exemption (CEQA Guidelines Section 15301) because the scope of work is limited to minor exterior alterations of an existing building.

**ALTERNATIVE ACTIONS**

In addition to the recommended action, the HRB may:

1. Continue the bonus floor area request for further discussion.

**ATTACHMENTS**

Attachment A: Location Map

Attachment B: Secretary of the Interior's Standards Compliance Memorandum

Attachment C: Project Plans

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