



CITY OF
**PALO
ALTO**

Historic Resources Board Staff Report

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

Meeting Date: June 12, 2025
Report #: 2506-4763

TITLE

PUBLIC HEARING / QUASI-JUDICIAL. 431 Kipling Street [24PLN-00290]: 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 431-433 Kipling Street (APN 120-15-021), 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:

- New wood stairs and metal handrails at front porch.
- Extension of rear porch, including wood screen windows, wood screen doors, and sidewalls featuring flush horizontal wood cladding.
- New wood stairs and metal handrails at rear porch.
- New accessible lift and enclosure at rear porch.
- Accessible bathroom.

The project includes the following rehabilitation work:

- Rehabilitate wood-sash windows and doors including evaluation of each window and door for routine maintenance, stabilization, and/or repair, as well as inspection for dry rot and wood damage based on existing conditions.
- 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 may include paint removal; removal and repair of sash including reglazing where necessary; repairs to wood frames and operating hardware; and repainting.
- Specific additional areas of work related to the treatment of historic wood features would include:
 - Investigation of existing narrow vertical window opening at the west end of the second floor at the rear (north) façade, with replacement window to match existing as needed.
 - Replacement of window screens in kind.
 - Removal of non-original surface material on entry porch decking, stair treads, and risers; repair or replacement in kind of original decking and replacement of non-original decking to match original; and painting.
 - Repair or replacement in kind of damaged decorative rafter tails.
 - Replacement of missing corner trim to match original.
 - Repair of inset openings in siding to blend with existing siding at east and west façades.

Additional areas of work include:

- New driveway gate and pedestrian gate with metal frames and horizontal wood slat cladding to replace existing non-historic fence and gate.
- Reroofing of front porch.
- In-kind replacement of metal screening at ground-level vents.
- Removal of electrical boxes, wires, and conduit that are no longer in use.
- Removal of window A/C units.

BACKGROUND

Palo Alto Historic Inventory

431-433 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 March 2024. 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

431-433 Kipling Street is located on a parcel that is 50 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 two-story mixed-use building with a commercial unit on the first floor (addressed as 431 Kipling Street), and a residential unit on the second floor (addressed as 433 Kipling Street). The two-story mixed-use 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 two-story building, then a single-family residence, was built by George W. Mosher in 1901 for Hiland H. Holley. The ownership transferred to the Leonard family sometime between 1916 and 1919. Newspaper records from 1919 show that the owner, Maude B. Leonard, commissioned an addition to the residence, along with construction of a garage several months later. A 1924 Sanborn Map Company map corroborates the timing of the addition, however there is no footprint of a garage until later Sanborn maps. Despite this discrepancy, newspaper advertisements from 1920 indicate that the newly built garage featured a “cement floor, light, and water,” and could be rented, most likely for automobile storage. At this point, the earlier rear outbuilding had been removed. During the 1920s, the Leonard family occupied the lower unit at 431 while renting the upper floor to another family.

Following this, around 1938 B.S. Gibson purchased the property and converted the lower unit to a commercial space for his window shade store “Gibson Shade Shop,” which remained in operation until the 1970’s when ownership transferred to James Alexander who also operated a window shade store, “Alexander’s Shade Shop.”

In the 1980s, Thoits Bros. took ownership of the property. Since that time, the subject building’s first floor commercial unit has been occupied by a local wine bar, Vino Locale. No further documentation of alterations to the exterior were uncovered through a review of available building permits or planning records, however, through visual analysis it appears that a north-facing door was replaced more recently at the rear upper balcony.

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 431-433 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 1901. These features include, but are not limited to:

- Two-story massing
- Hipped roof with open eaves and exposed rafter tails
- Horizontal wood cladding at first floor with wood corner boards
- Wood shingle cladding at side walls and base of entry porch
- Wood shingle cladding at second floor and second-floor balcony with flared detail at base
- Wood-clad water table across all façades at first floor
- Wood belt course across all façades between first and second floor
- Entry porch with low walls and Tuscan columns
- Wood window and door surrounds
- One-over-one double-hung sash windows with ogee lugs
- Fixed single-pane window with checkered mullion transom on front façade

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)¹ 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

¹ 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>

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.

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

#	STANDARDS FOR REHABILITATION	ANALYSIS
1	<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>	<input checked="" type="checkbox"/> CONSISTENT <input type="checkbox"/> NOT CONSISTENT <input type="checkbox"/> N/A <u>Explanation:</u> Although the property was built as a residential rental property, it currently has a commercial unit on the first floor and a residential unit on the second floor. This use has not changed the exterior appearance of the building. The proposed project would retain the current use and retain the building's distinctive materials, features, spaces, or spatial relationships. Therefore, the proposed project complies with Rehabilitation Standard 1.
2	<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>	<input checked="" type="checkbox"/> CONSISTENT <input type="checkbox"/> NOT CONSISTENT <input type="checkbox"/> N/A <u>Explanation:</u> The proposed project does not propose to remove or replace any historic features of the building. The stairs and railings at the front porch are non-historic, as are the rear stairs, screened porch, rear addition, and driveway gate, which all date to after the period of significance. None of the proposed alterations to the driveway gate or rear porch meaningfully alter spaces, spatial relationships, or circulation patterns that characterize the property. Proposed renovation

#	STANDARDS FOR REHABILITATION	ANALYSIS
		<p>work would be limited to in-kind replacement, as well as the patching, repair, and repainting of existing historic materials including historic wood siding, windows, and doors. Only non-historic electrical boxes, wires, and conduits that are no longer in use, and non-original surfacing on porch decking, stairs, and risers are proposed for removal. Areas of non-original siding, trim, decking, and stair treads and risers are to be replaced to match the building's original materials. Existing asphalt shingle roofing would be replaced in kind. As such, the historic character of the building would be retained, and 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 would create a false sense of historical development. Many of the changes proposed are limited to repair and in-kind replacement, and alterations proposed to the front steps and proposed rear porch would incorporate non-historic and contemporary features such as metal tube railings, metal planter boxes, and an accessibility lift that would be contemporary in style and would not create a false sense of historical development. 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 1901 have acquired significance in their own right. 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 431-433 Kipling Avenue. The character-defining features of the building which convey the techniques and craftsmanship of its construction include its two-</p>

#	STANDARDS FOR REHABILITATION	ANALYSIS
		<p>story massing with a hipped roof, open eaves, and exposed rafter tails; various wood plank and shingle cladding types; decorative wood features including belt course, and entry porch with low walls and Tuscan columns; wood window and door surrounds; one-over-one double-hung wood-sash windows with ogee lugs; and a fixed single-pane wood-sash window with a checkered mullion transom on the front façade. As discussed under Rehabilitation Standard 2, the proposed project would retain all historic features and 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>
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, the front porch, entrances and associated features, and all functional and decorative wood components to outline areas of repair and/or potential replacement. The proposed project would follow the guidance of the National Park Service (NPS) in <i>Preservation Brief 9: The Repair of Historic Wooden Windows</i> and <i>Preservation Brief 10: Paint Removal from Historic Woodwork</i> 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 their existing 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 for the 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>

#	STANDARDS FOR REHABILITATION	ANALYSIS
8	<i>Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.</i>	<input type="checkbox"/> CONSISTENT <input type="checkbox"/> NOT CONSISTENT <input checked="" type="checkbox"/> N/A <u>Explanation:</u> The proposed project does not involve any major ground disturbance. In the case of the inadvertent discovery of archaeological materials during ground disturbing activity, provided that standard discovery procedures for the City of Palo Alto are followed, the proposed project complies with Rehabilitation Standard 8.
9	<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>	<input checked="" type="checkbox"/> CONSISTENT <input type="checkbox"/> NOT CONSISTENT <input type="checkbox"/> N/A <u>Explanation:</u> As previously described in the discussions for Rehabilitation Standards 2 and 5, proposed alterations and new construction would only affect non-historic features. The proposed front steps are sufficiently differentiated from the historic features of the building through the use of simple metal railings and metal planter boxes, which also maintain a contemporary, subdued aesthetic that defers to the historic features of the original design. Despite their contemporary material, the overall dimensions and look of the planters are compatible with the building's 1901 design as they resemble the low side walls that would have been typical for a building of this era. The proposed rear porch, which connects to the non-original 1919 rear addition, also features wood steps with metal railings, as well as horizontal wood cladding on its sidewalls and wood-frame screens, windows, and doors. The use of horizontal wood cladding allows the proposed rear porch to remain compatible with the original design of the building, while the selection of a different cladding profile with a larger dimension, and the use of metal handrails, differentiates the rear porch as a contemporary addition. The proposed lift would be enclosed on its north side by a wood sidewall matching the rest of the rear porch, that would screen its more contemporary look and enhances its compatibility with the historic building. The use of differentiated horizontal wood slat cladding similarly identifies the proposed vehicle gate and pedestrian gate as contemporary. Overall, the new features would not destroy any historic materials and are generally compatible with the material, scale, and form of historic features. Therefore, the proposed project complies with Rehabilitation Standard 9.

#	STANDARDS FOR REHABILITATION	ANALYSIS
10	<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>	<input checked="" type="checkbox"/> CONSISTENT <input type="checkbox"/> NOT CONSISTENT <input type="checkbox"/> N/A <u>Explanation:</u> If the proposed front and rear porch alterations, as well as the proposed gate and fence, were to be removed in the future, the historic form and integrity of the historic building would remain intact. The areas of the front and rear porches have previously been altered from their original 1901 design and the potential removal of the proposed alterations would not impact the historic building or its historic integrity. The proposed rear porch would be attached to the building minimally through its sidewalls and wood-frame fenestration. These alterations are, therefore, reversible and would not impact the historic form and integrity of the property. Therefore, the proposed project complies with Rehabilitation Standard 10.

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 proposed project. As such, the proposed project would be consistent with the Standards and the historic building at 431-433 Kipling Street would not be negatively impacted by the proposed project and would continue to express its historic significance and integrity.

Therefore, 431-433 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

AUTHOR/TITLE:

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