

MEMORANDUM

DATE	May 12, 2025	PROJECT NO.	24402.04
TO	Steven Switzer, Historic Preservation Planner	PROJECT	University and Kipling Avenues, Palo Alto – SOI Standards Compliance
OF	City of Palo Alto 250 Hamilton Avenue, 5 th Floor Palo Alto, CA 94301	FROM	Clare Flynn, Cultural Resource Planner, Page & Turnbull
CC	Christina Dikas Brobst and Barrett Reiter, Page & Turnbull	VIA	Email

REGARDING **411 Kipling Street, Palo Alto – SOI Standards Compliance Memo**

Introduction

This Secretary of the Interior's (SOI) Standards Compliance Memorandum has been prepared by Page & Turnbull regarding the property at 411 Kipling Street, Palo Alto (APN 120-15-023) in Palo Alto's Downtown North neighborhood (**Figure 1** and **Figure 2**). This memorandum was prepared in anticipation of a proposed project at the site. The property contains a one-and-a-half-story residential building, currently used as two commercial units, which was constructed in 1902 by prominent local builder G. W. Mosher for Hiland H. Holly for use as a residential rental property.

411 Kipling Street is listed as a Category 2 ("Major Building") historic resource on the local Palo Alto Historic Inventory.¹ 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) completed by Page & Turnbull in November 2023.² The Palo Alto Historic Resources Board (HRB) and Palo Alto City Council reviewed and approved the findings of the HRE, elevating the building from Category 4 to Category 2 on September 9, 2024.³ The definition of Category 2 is: "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."⁴ Category 2 historic properties require historic preservation project review according to Palo Alto's Historic Preservation Ordinance (Municipal Code Section 16.49.040).

¹ "Historic Registers," City of Palo Alto Website, accessed September 6, 2024, <https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Historic-Preservation/Historic-Registers>.

² Page & Turnbull, *411 Kipling Street: Historic Resource Evaluation*, November 21, 2023.

³ "Consent," City Council Staff Report #: 2407-3290, City of Palo Alto City Council Special Meeting, September 9, 2024.

⁴ "Historic Registers," City of Palo Alto. Website, accessed September 6, 2024, <https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Historic-Preservation/Historic-Registers>.

The purpose of this memorandum is to review the proposed exterior alterations to the property for compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* to determine whether the proposed project poses a potential impact to the historic resource.



Figure 1. Subject property at 411 Kipling Avenue, indicated with dashed red outline.
Source: Google Maps, 2022. Edited by Page & Turnbull.



Figure 2: Subject property at 411 Kipling Avenue, view northeast

Methodology

Page & Turnbull prepared an HRE for this property in November 2023. The HRE provided information on the historic development and construction history of the property. It provided an evaluation of the building's historic significance under Criteria 2, 5, and 6 of the Palo Alto Historic Inventory and an assessment of the building's ability to convey that significance through its high level of historic integrity.

Page & Turnbull reviewed drawings of the proposed project that were prepared by Hayes Group Architects (dated April 17, 2025) and were provided by the City of Palo Alto to Page & Turnbull via email on May 5, 2025. No additional building-specific research was conducted for the purposes of this memorandum.

Existing Historic Status

As previously noted, 411 Kipling Street is a Category 2 property listed on Palo Alto's Historic Resources Inventory. Previous surveys and reports did not establish a period of significance for the

property; however, a period of significance of 1902, aligning with the building's original date of construction, has been assumed for the purpose of this analysis.

Character-Defining Features

Character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible for historic designation relating to architectural merit, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, 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 character-defining features of 411 Kipling Street Avenue have not previously been identified but 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

Proposed Project Description

The proposed project description is based on the Building Planning Submission Revision #1 drawing set for 411 Kipling Street (dated April 17, 2025), prepared by Hayes Group Architects.

The proposed project includes the following scopes:

- Replace existing concrete path from public sidewalk to front porch with new accessible concrete path.
- Replace concrete path at southwest side of front porch with new stabilized decomposed granite path that wraps around the southeast side of the property
- Install new accessible platform lift with adjacent concrete sidewalk at rear (northeast) corner of building

- 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
- 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 or physical evidence
 - New work shall match the old in material, design, scale, color, and finish.
- Additional work will 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

SOI Standards Compliance Analysis

The *Secretary of the Interior's Standards for the Treatment of Historic Properties & Guidelines for Historic Buildings* (the Standards) provide guidance for reviewing proposed work on historic properties, with the stated goal of making possible "a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."⁵ The Standards are used to evaluate proposed work on historic properties and

⁵ 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

are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Projects that do not comply with the Standards may cause either a substantial or less-than-substantial adverse change in the significance of a 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 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 at 411 Kipling Street.⁶

SECRETARY OF THE INTERIOR’S STANDARDS ANALYSIS

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.*⁷

Discussion: 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.

Therefore, the proposed project complies with Rehabilitation 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 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

Preservation Services, Washington, D.C.: 2017), accessed August 22, 2024, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

⁶ Grimmer, The Secretary of the Interior’s Standards.

⁷ This and the following Standards are listed in Grimmer (2017) and also at National Park Service, U.S. Department of the Interior, “Technical Preservation Services: Rehabilitation as a Treatment,” accessed May 5, 2025, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

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.

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 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 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.

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

Discussion: 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.

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

Discussion: 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.

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: 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.

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: 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.

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 would not undertake ground-disturbing excavation work. Therefore, Rehabilitation Standard 8 would not be applicable to the project.

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 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 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.

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: 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 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.

Conclusion

As the above analysis demonstrates, the project as currently designed complies with the guidance of the *Secretary of the Interior's Standards for Rehabilitation*. The proposed project is consistent with nine of the ten Standards for Rehabilitation, and Standard 8, related to archaeological resources, does not apply to the proposed project. As such, the proposed project is consistent with the Standards and the historic building at 411 Kipling Street would not be negatively impacted by the proposed project. The building would in fact be preserved and maintained to ensure its continued historic significance and integrity. Therefore, 411 Kipling Street would remain eligible as a Category 2 building on Palo Alto's Historic Resources Inventory.

Appendix

Preparer Qualifications

Page & Turnbull was established in 1973 as Charles Hall Page & Associates to provide architectural and conservation services for historic buildings, resources, and civic areas. The company was one of the first architecture firms in California to dedicate its practice to historic preservation and is among the longest practicing such firms in the country. Offices are located in San Francisco, Los Angeles, Sacramento, and San Jose, and staff includes licensed architects, designers, architectural historians, conservators, and planners. All of Page & Turnbull's professional staff members meet or exceed the Secretary of the Interior's Historic Preservation Professional Qualification Standards.

This Standard Compliance Memorandum was prepared by staff in Page & Turnbull's San Francisco office, including Christina Dikas Brobst, principal-in-charge; Barrett Reiter, project manager; and Stephanie Hodal, Cultural Resources Planner, the primary author; and Clare Flynn, Cultural Resources Planner, all of whom meet or exceed the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, Architectural History, or History.