STAFF BRIEF

This document is the staff's comparison of the Secretary of the Interior Standards for Rehabilitation, Design Guidelines for Denver Landmark Structures and Districts, the Landmark Preservation Ordinance (Chapter 30, Revised Municipal Code) and other applicable adopted area guidelines as applied to the proposed application. It is intended to provide guidance during the commission's deliberation of the proposed application. Guidelines are available at www.denvergov.org/preservation

Project: 2020-COA-018  
Address: 1348 Humboldt St.  
Historic Dist/DLM: Wyman  
Year structure built: 1902 (Period of Significance: prior to and including 1955)  
Council District: #10 Chris Hinds  
Applicant: Matthew Wise  
LPC Meeting: February 4, 2020  
Staff: Abigail Christman

Project Scope Under Review:
Violation for front yard retaining wall completed without Landmark review/ zoning permit. A open front yard with a slope (Denver Hill) was replaced with a tinted (red and gray) concrete block retaining wall. The wall is constructed of Promuro Interlocking Blocks. These are hollow concrete blocks and measure 6" high, 18" wide, and 12" deep. Units feature a distressed/rough facing. The wall features a capstone.

Staff Summary:
Site work at this property was done without Landmark review and approval. A zoning permit is also required for the construction of any retaining wall that is over 12" in height. The applicant realized that the project should have gone through Landmark review and self-reported the violation.

The applicant replaced an open, sloped front yard with a concrete-block retaining wall that ranges in height from 39" to 47". The property is located in the Wyman Historic District. Retaining walls are not a historic feature of the district, though retaining walls have been added to some properties. Most of the properties on the east side of the block (where 1348 Humboldt St. is located) retain a sloped front yard or Denver Hill. This slope is not as present on the opposite/west side of the block. There are some other retaining walls on the block, but most are low in height and simple in design. Retaining wall materials found on the block include wood, stone, and concrete.

Staff find that the retaining wall constructed at 1348 Humboldt St. does not meet design guidelines. The height, scale, texture, coloring, and materials are not compatible with the district. The retaining wall is contemporary in character. There is no mortar between the rows of concrete blocks, which are instead supported by rebar and adhesive. The blocks feature a distressed face, tinted in red and gray. The Commission has previously determined tinted concrete block to be inappropriate for retaining walls on contributing properties in residential historic districts and have required higher quality materials and more traditional design/construction. (The Commission recently approved one concrete wall, but it was a high-quality, untinted, board form concrete wall with a smooth face). Generally walls compatible with historic residential properties and distracts are mortared, constructed of stone or brick, and feature coping or capstone. However, retaining walls are not a historic feature of the Wyman District. So staff would recommend that any retaining wall installed in the district be as minimal as possible, in height as well as in visual presence, and retain as much of any existing Denver Hill as possible. The wall at 1348 Humboldt St. is too tall (appearing to be taller than any other retaining wall on the block) and the concrete blocks used have a massive, weighty appearance.
<table>
<thead>
<tr>
<th>Guideline</th>
<th>Meets Guideline?</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 5.3 Plan new site and landscape features to respect the character-defining features of the historic district or individually-designated Denver landmark.  
c. When introducing a new site feature or modifying an existing feature, such as a stairway, fence or retaining wall, respect historical patterns in terms of placement, proportions and design compatibility with surrounding historic context.  
f. Avoid introducing new readily visible site features, such as curb cuts, which were not historically present on the property, or prevalent in the historic district. | No | The new retaining wall is not compatible with the character of the Wyman Historic District or the buff brick residence at 1348 Humboldt Street, which is a contributing property to the district. The retaining wall is constructed of tinted, distressed, hollow-core concrete blocks. Retaining walls are not a characteristic feature of the historic district, though some simple, low walls have been added after the period of significance. The height and proportions of the new wall are out of proportion with the other retaining walls on the block. The height of the wall and the size/character of the blocks make the wall highly visible. |
| 5.5 Maintain the character of a “Denver Hill” sloping front yard area.  
a. Preserve the character of a “Denver Hill” sloping front yard area where it is a character-defining feature of the historic district or a characteristic of the block  
b. Where the slope is unstable, use plant materials, or subterranean retaining walls to stabilize the slope, whenever possible. | No | The sloping front yard has been replaced with a large retaining wall that completely eliminates the slope. |
| 5.10 Explore alternatives before proposing significant alterations to the “Denver Hill.” Alternatives to explore include:  
a. Using stabilizing plant materials with drought-tolerant planting and other ground cover that does not require mowing or a high degree of maintenance, rather than constructing a new retaining wall.  
b. Constructing a low, open style, fence at the top of the slope to provide an enclosed front yard area for children or pets, rather than replacing the slope with a new retaining wall.  
c. Constructing a subterranean retaining wall to stabilize the slope. | No | No information has been submitted to support the need for stabilizing the slope or other alternatives pursued for stabilizing the slope. |
5.11 Avoid adding a new retaining wall unless necessary and all alternatives have been explored.

- Add a new retaining wall that will alter the slope of a “Denver Hill” front yard area only where at least one of the following conditions is present:
  - The “Denver Hill” is not a character-defining feature of the historic district.
  - There is a high level of variety in the treatment of front yard areas among adjacent properties, including retaining walls.
  - The front yard slope is unstable, threatens the foundation of a historic structure, and other stabilization strategies have failed.

No

The Denver Hill is a feature of the Wyman Historic District. While there are some retaining walls found on the block, most are low and simple in design. No information on the stability of the slope or other stabilization strategies pursued has been provided.

5.12 Locate and design a new retaining wall to minimize impacts on the historic district or historic property (when warranted based on the criteria in Guideline 5.11).

- Use a low kick wall, up to one foot in height, to help stabilize the yard while maintaining most of the historic slope.
- Design a new retaining wall to minimize visual impacts on the character-defining features of the historic property, block and district.
- Use materials that are common to the historic district or that relate to the historic property. For example, if a stone wall is a part of the design tradition, the wall should be stone, or stone-faced.
- Do not completely replace the slope with a tall retaining wall.

No

The retaining wall as constructed does not meet Landmark guidelines:
- The retaining wall is much taller than one foot, reaching nearly 4 feet at its highest point.
- None of the historic slope has been retained.
- The material is contemporary in character and does not relate to the historic property or the historic district.
- The new retaining wall is visually prominent.

---

**Excerpted from Character-Defining Features of the Wyman Historic District, January 2016**

<table>
<thead>
<tr>
<th>Character-defining features</th>
<th>Matches features?</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Streets &amp; Streetscapes:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Streets run north-south and east-west in a typical grid with north-south alleys dividing city blocks in half, creating large rectangular blocks. Wide asphalt streets and narrow asphalt alleys. Typically open front yards, mostly at grade on east-west streets and with a hill of varying slope on north-south streets.</td>
<td>No</td>
<td>The open front yard and slope have been replaced by a tall retaining wall.</td>
</tr>
</tbody>
</table>
Walls and Fences:
Front Yards: Typically open front yards. Some higher style Queen Anne and Shingle Style homes feature historic wrought iron fencing on a low masonry base.
Side & Rear Yards: Wood fences enclose rear and side yards.
Retaining Walls: Not historically present.

<table>
<thead>
<tr>
<th>Recommendation:</th>
<th>Denial</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basis:</td>
<td>The design and materials of the retaining wall are not compatible with the historic character of the property or the historic district (Guidelines 5.3, 5.5, 5.10, 5.11, and 5.12)</td>
</tr>
</tbody>
</table>

Suggested Motion: I move to deny application #2020-COA-018 for the proposed retaining wall at 1348 Humboldt Street Street, as per design guidelines 5.3, 5.5, 5.10, 5.11, and 5.12, character-defining features for the Wyman Historic District, presented testimony, submitted documentation and information provided in the staff report.
Map of Wyman Historic District with 1348 Humboldt St. outlined in red: