STAFF BRIEF

This document is the staff’s comparison of the Secretary of the Interior’s 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: 2019-COA-251
Address: 2834 Curtis Street
Historic Dist/DLM: Curtis Park F
Year structure built: c. 1887 (Period of Significance: 1870-1902)
Council District: #9 Candi CdeBaca
Applicant: Cassandra Covotsos and Ridge Road Investments LLC

LPC Meeting: July 20, 2021
Staff: Abigail Christman

Project Scope Under Review:

Modifications to previously issued COA (2019-COA-251). Modifications under review include work completed that did not follow the original COA as well as some proposed modifications not yet completed.

Work not matching or exceeding COA includes:
- All concrete sitework including walkways, landings, and steps is tinted (color Redwood)
- Wood and metal trellises installed in side and rear yard
- AC unit installed
- Exterior lighting added
- Proposed concrete parking pad at rear replaced with crushed gravel
- Alterations made to light wells/egress openings including replacing windows, altering opening size, creating new openings, and installing new galvanized metal window wells. Previously approved plans identified two window wells on the south elevation but there are four window wells on the south elevation as well as a egress opening added at the rear.
- New metal railings installed at front steps and side stairs to basement
- Flagstone path and patio at rear

Staff Summary:

2834 Curtis St. was constructed circa 1887 and is located in the Curtis Park F district. The district application listed 2834 Curtis St. as non-contributing. At the time the designation was completed, the original structure was obscured by multiple non-historic additions including a front porch and sunroom. The applicant has removed the porch and sunroom, revealing the original structure and historic features including decorative window hoods, roof brackets, and gable returns. Staff finds that with the original structure exposed, the structure now contributes to the significance for which the district was designated. According to the Landmark ordinance, the Commission may approve a change in status when "the structure or feature has been rehabilitated or restored so as to meet the criteria for contributing structures or features," but the change from non-contributing to contributing status may only be made at the owner’s request. Since no request to change the status has been made, no change in status is proposed.
2834 Curtis St. was purchased by Ridge Road Investments LLC in 2017. Work on the property was begun without Landmark review or permits. Work included demolition of non-historic features including the porch, addition, accessory structure, and site features. The applicant also replaced windows, altered light wells and egress wells, installed a sliding door at rear, and removed a second story gable end window on the façade. The Landmark inspector issued a notice of violation on October 25, 2018. The applicant worked with Landmark staff to obtain approval for work done without review as well as for additional work including fencing, stuccoing a wall, and new concrete walkways. The majority of work completed or proposed met Landmark guidelines. The material of some of the new windows and the sliding door did not meet Landmark guidelines, but the applicant proposed to replace these to meet guidelines. Thus, the project qualified for administrative review and did not go to the LPC. The majority of the work was approved under 2019-COA-0000251 issued 6/26/2019. This COA included all site work. Some work on the house was separated into a separate application. This was done so that the site work could be approved, permits pulled, and work on site could resume while the applicant prepared an application for windows and doors on the house. A second COA, 2019-COA-0000482, was issued on 11/27/2019. This COA included installation of a new window on the gable end, two windows at the rear, two basement windows, and a sliding door.

A permit was not pulled for the work approved in 2019-COA-0000251, though work on the site resumed. (A permit was pulled for work approved under 2019-COA-0000482, though work has not been completed with the opening on the gable end remaining unfilled). In September 2020, the Landmark inspector visited the site, reporting that work was underway without permits and that some of the work did not match what had been approved in the COA. The inspector informed the applicant that all required permits for all the work approved under 2019-COA-0000251 must be obtained before the project could pass final inspections and that all work would need to match the Landmark COAs. The application under review is the revised materials submitted by the applicant to address changes. Once a revised COA is issued, then the applicant can apply for permits. Staff determined that this application needed to go to the Commission for review due to concerns over whether all alterations made meet Landmark guidelines as well as concerns with the ongoing violations at this property. Violations first identified by Landmark in 2018 remain unresolved.

Staff's primary concern with the work as completed is with the tinting used for the walkways, steps, and landings. The tinting is a dark pinkish color and very noticeable. Though 2834 Curtis St. is a non-contributing property, thus receiving more flexibility in design review, no alterations to a non-contributing property should negatively impact the larger district or make a non-contributing property less compatible with the district. Staff find that the tinted concrete is not compatible with the district. While plain concrete tends to fade into the background, the tint used makes the concrete site features visually dominant. Google street view photos show that the walkways at 2834 Curtis St. were previously plain, un-tinted concrete. The public sidewalk in front of the house is flagstone, but the color of the tinted walk does not match the flagstone and stands out more for contrasting with it. The new concrete used for replacement walkways, steps, and landings should have matched the concrete being replaced. Instead, it appears that the applicant was trying to recreate the appearance of the flagstone sidewalk. However, the color of the concrete does not match the flagstone. Additionally, while flagstone may have been used historically for the section of walkway leading directly from the public sidewalk to the house (this is found within the district), flagstone would not have been used for steps or landings. Thus, staff finds that the extent of tinted concrete used on the property is visually overwhelming and historically incompatible. Staff recommends approval with the condition that the tinted concrete be replaced with plain concrete with no tint.

Staff have added several attachments to the submittal packet for reference. Please refer to these for details on work previously approved:
- 12/10/2018: Initial application outlining work done without approval and including before and after photos
- 6/26/2019: 2019-COA-0000251 and stamped plans issued for demolition and site work
- 11/27/2019: 2019-COA-0000482 and stamped plans issued for window and door replacement
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<tr>
<th>Guideline</th>
<th>Meets Guideline?</th>
<th>Comments</th>
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<td>2.18 Locate and design a new egress window to be as inconspicuous as possible.</td>
<td>Yes</td>
<td>The egress window added at the rear is appropriately placed in a location without public visibility. Basement openings were also altered and a new opening added on the south side. The basement openings have limited visibility since they are on the side and the windows used in these openings are appropriate. However, the four galvanized metal window wells added at these openings are somewhat excessive and make these alterations more visually prominent.</td>
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<td>a. Place an egress window on a less visible façade that does not face the street, if possible.</td>
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<td>b. Align a new basement egress window or expansion of an existing window with other windows and features on the façade.</td>
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<td>c. Match a new basement egress window to a historic basement window type or use a simple single-light casement window.</td>
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<td>2.36 Use historic evidence to inform replacement of a missing front porch or stoop.</td>
<td>Yes/No</td>
<td>The original entry to the house was altered when a new porch was added. The original appearance is unknown, but given the raised foundation of the house, it seems evident that there would have been some sort of steps and stoop at the entrance. The applicant has constructed simple concrete steps and a stoop at the entrance with a simple metal railing. While the steps, stoop, and railing would likely originally have been wood rather than concrete and metal, this is a non-contributing property so more flexibility in design is appropriate. Staff finds the steps, stoop, and railing to be simple in design and compatible with the district. However, the concrete used for the steps and stoop have been tinted and this tinting is not appropriate. The dark pinkish tint used makes what should be a simple, functional feature more visually prominent. The tinting appears to have been used to resemble the appearance of flagstone, but flagstone was not used historically for steps and stoops.</td>
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<td>a. Add a new front porch or stoop to a historic residential structure only when there is evidence that one was historically present, or an original porch or stoop is present on a very similar adjacent structure (sometimes called a “sister house”).</td>
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<td>b. Reconstruct a porch or stoop based on historic documentation of its location, appearance and materials. If good documentation does not exist, a replacement design may be based on contextual analysis.</td>
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<td>c. If there is evidence that a porch or stoop once existed, but no historical documentation is available, design a new porch or stoop as a simplified version of a comparable feature on a similar structure in the surrounding historic context (preferred). A more decorative porch or design may be appropriate if decorative porches appear on comparable structures in the surrounding historic context (will be considered on a case-by-case basis).</td>
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<td>d. Design a replacement porch or stoop to be appropriate to the architectural style and relate to the overall scale of the primary structure.</td>
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<td>e. When there is no evidence that a front porch or stoop existed, consider adding a sensitive and appropriately scaled patio as an outdoor seating area.</td>
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**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.
- d. When designing a new sidewalk or path, use colors, styles and finishes similar to those seen in nearby historic sidewalks.
- e. Avoid introducing new site features that convey a false sense of history.

| **No** | The concrete used for the new walkways, steps, and stoops has been tinted. The color used is Redwood, which has a dark pinkish appearance. Google street view photos show that the walkways at 2834 Curtis St. were previously plain, un-tinted concrete. The public sidewalk in front of the house is flagstone, but the color of the tinted walk does not match the flagstone and stands out more for contrasting with it. The new concrete used for replacement walkways, steps, and landings should have matched the concrete being replaced. Tinted concrete is not characteristic of the district. The tinted concrete also could be seen as creating a false sense of history since it seems to be trying to be replicate the historic flagstone walks in the district but is used for features such as steps and stoops which would not have been constructed from flagstone historically. |

| **5.21 Design lighting to be compatible and subordinate to historic buildings and the surrounding historic context.**
- a. Use existing or ambient streetlight or storefront lighting rather than adding new lighting whenever possible.
- b. If new light fixtures are necessary, use a contemporary design, or simplified historic lighting design that is compatible with the placement, design, materials and quality of lighting on adjacent historic buildings.
- c. Limit the level of illumination to be sufficient to perform the needed lighting task.
- d. Design and orient new light fixtures to provide down-lighting. |

| **Yes** | New exterior light fixtures feature a simplified historic design and are located at entrances. |

**Recommendation:** Approval with Condition

**Conditions:** All concrete sitework, steps, and stoops to be plain concrete with a smooth finish and no tinting.

**Basis:** Tinted concrete is not a historic feature of the Curtis Park Historic District and it is not compatible with the historic character of the district. When replacing missing front stoops and steps, then a simplified version of a comparable feature on a similar structure in the surrounding historic context should be used.

**Suggested Motion:** I move to CONDITIONALLY APPROVE application #2019-COA-251 for the proposed COA revisions at 2834 Curtis St, as per design guidelines 2.36 and 5.3, character-defining features for the Curtis Park historic district, presented testimony, submitted documentation and information provided in the staff report with the following condition: All concrete sitework, steps, and stoops to be plain concrete with a smooth finish and no tinting.
Curtis Park District Map with 2834 Curtis St. outlined in red.