

Guideline:	Public Comment:	Staff Response:
Egress Windows		
2.18	Should there need to be a dimension to differentiate an egress window well from a lower-level walkout? What is the dimension past which a guardrail is required? Does there need to be a separate section defining the requirements for a lower-level walkout?	staff agrees - revise to something like this: "egress wells shall meet current zoning and building code requirements"
2.18d	This should refer to "basement window" not just existing window to avoid the possibility of enlarging 1st or 2nd floor windows on the primary facade.	Staff agrees
2.18e	Maintain proportions of original buildings when enlarging openings.	Staff agrees - revise to "Maintain width of existing windows and header heights, when possible"
2.19f	Are concrete window wells considered masonry window wells? Would be helpful to clarify this. I think concrete window wells are appropriate. Also think that allowable projection of window well should be clarified. I don't think that more than a couple inches is appropriate.	Staff agrees - concrete is fine. Need to discuss maximum dimension that window wells protrude above grade (see comment #7) - staff is generally supportive of 12" or lower
2.19f	suggest changing the language to "shall not protrude more than 12 inches above grade." to clarify the guideline	Staff agrees
Historic Window Replacement		
2.19 & 2.23	Why "only replace a historic door if it is damaged beyond repair," but not a historic window?	Staff agrees - make language in guidelines 2.19 and 2.23 consistent about when replacement is necessary
2.19c	set windows in, not into	Staff agrees - revise to "Set windows into the wall at the same depth as the windows being replaced."
2.19c	Clarify text- Set into the wall at the same depth?	Staff agrees - will revise to "Set windows into the wall at the same depth as the windows being replaced."
2.19d	the width is perhaps more critical than thickness	Staff agrees

2.19d	Add language about matching original "sightline and profiles" of the existing historic windows.	Staff disagrees - window comparison and combability demonstration required as part of the window replacement applicant. Difficult to enforce sightlines and profiles.
2.19	Nothing in this guideline prohibits the use of storm windows, or the addition of some other insulating (or protective) glass. Perhaps the audience needs explicit permission (and further guidance) to install such systems (and accept the retention of existing windows). Expanding on this idea, the City may consider assembling a guide for reducing operational energy/carbon while satisfying the Landmark Preservation Design Guidelines (and limiting embodied energy/carbon emissions).	Comment issued in error (see comment #15, below)
2.19	Oops. Just kidding. Guidelines 2.31-2.33 are already on it.	n/a
2.19e	We should not be demanding that persons replace leaded and stained glass windows with new leaded or stained glass windows. These traditionally single-pane window types are terrible for operational carbon output as they cannot insulate. Historic building are hard enough to keep warm and cool without us demanding that new windows remain equally poor insulators.	Staff disagrees - leaded glass can be insulated with ventilated storm windows
2.19i	verbiage should be clarified with use of a graphic	Staff agrees - a number of graphics are in process
2.19k and 2.20a	Could this language be moderated to allow the Landmark Preservation Commission some leeway to approve sensitively detailed partial window infills? While I agree that it is generally bad practice to use perimeter infill framing to reduce the size of window openings, some ability to change sill heights on secondary facades is needed when adapting historic buildings to current needs. I would suggest that the guideline require any infill to express the original proportions of its masonry opening and to keep original brick and stone sills in place.	Staff agrees
Non-Historic window Replacement		

2.20	The applicability of this guideline may need to be clarified like 2.19; "When replacing a missing or non-historic window, match replacement design to the historic if possible."	Staff agrees - make this consistent language with guideline 2.19
2.20a	This should not be a new requirement. Using perimeter infill framing can be helpful for environmental purposes (lower emissions), so if windows are already not historic in character, we should not adding a requirement that homeowners are required to use an older, less emission-friendly standard.	Staff disagrees - this is just clarifying existing practice
2.20a	Nothing in this guideline prohibits the use of storm windows, or the addition of some other insulating (or protective) glass. Perhaps the audience needs explicit permission (and further guidance) to install such systems (and accept the retention of existing windows). Expanding on this idea, the City may consider assembling a guide for reducing operational energy/carbon while satisfying the Landmark Preservation Design Guidelines (and limiting embodied energy/carbon emissions).	Comment issued in error (see comment #22 below)
2.20a	Oops. Guidelines 2.31 - 2.33 already do this. Sorry.	n/a
2.20d	In consideration of cost, refine this requirement to apply only to the primary facade	Staff disagrees - cost considerations are not within Landmark purview
General Comment	Non-Historic Window Replacement (under section 2.20) - It states, "When replacing non-historic window, use traditional materials," which seems to be creating more restrictions than necessary here. Again what is the intended outcome rather than design prescriptive?	Staff disagrees - For tax credit purposes traditional materials must be used
Historic Door Replacement		
2.23a	Should this be "Replace a historic door only if it is damaged beyond repair?"	Staff agrees
Non-Historic Door Replacement		
General Comment	This new guideline should be removed. If property owners acquired a property with a door that has already been replaced to be non-historic in design, we should not require them to revisit the historic design.	Staff disagrees - properties are designated "as is." When making changes, Landmark review is triggered. Guidelines for replacing non-historic doors is needed to help guide this process

General Comment	The applicability of this guideline may need to be clarified like 2.23; "when replacing a missing or non-historic door, match replacement design to the historic if possible."	Staff agrees
General Comment	Maybe this guideline should be clarified to make clear that replacement of features is never required. But if an owner chooses to replace a non-historic door, then it should be replaced with a door that is compatible with the design of the building	Staff agrees
General Comment	Non-Historic Door Replacement – New Guideline for Replace missing non-historic door (under 2.23 section) - We would reiterate one of the comment on the document: "This new guideline should be removed. If property owners acquired a property with a door that has already been replaced to be non-historic in design, we should not require them to revisit the historic design." We say properties are designated as is, and this guideline is not only going against this statement, but it is also a prescription and not really a "guideline"	Staff disagrees - properties are designated "as is." When making changes, Landmark review is triggered. Guidelines for replacing non-historic doors is needed to help guide this process
Historic Roof Replacement		
2.25	Suggest using the term "roofing" instead of roof to be more specific about the roofing materials, i.e., shingles, tile, metal, etc.	Staff agrees
2.25b	We should specify that adding gutters to a building, even if the structure did not previously have gutters, is expressly permissible.	Staff agrees, however this does not require a permit and therefore is not within Landmark purview
2.25d	Consider if a dimensional shingle would more closely simulate a wood shingle than a "low profile shingle".	Staff disagrees - staff considers dimensional shingles to be low profile.
2.25d	suggest adding "or otherwise highly visible from the public way." to the end of the last sentence.	Staff agrees - standard language is to use "visibility from the street and sidewalk or from public view"

2.25c and 2.25d	<p>Historic Roof Replacement - All roofs will need replacement at some point in their life, and in many cases a roof may already be a different material than original. A perfect example is Smith’s Chapel (local landmark and Historic Denver Easement), which had an asphalt roof for decades after the wood roof was replaced in the 1930s. After discussion with the owner, a composite roof material, rather than requiring wood or asphalt, was recommended by the staff and approved by the commission. The composite material captures the visual appearance of wood, is more durable than asphalt to our harsh Colorado weather and is more readily available. If draft language is un-changed it could require a debate every time a landmark needs a new roof and proposes a material other than the original. This is also an area where greater flexibility can support equity goals by offering material options that still serve the intent of the guideline, and maintaining these older properties.</p> <p>There is mention of synthetic roofing, but there are restrictions for this, and could get confusing. Looking at making it clearer that composite/synthetic/replacement materials for roofs are okay if the current needs replacement. By not limiting new and diverse materials options, allows for greater flexibility foreach property.</p>	Staff agrees - guideline 2.25c and 2.25d will be clarified to indicated roofing can be replaced with alternate materials
Solar Panels and Solar Roofing Tiles		
2.33	This title is confusing since these guidelines appear to only address solar panels and not solar tiles.	Not applicable - placeholder language, will be removed and not appear in the guideline document
2.33	Section appears to lack any guidance specific to solar tiles. Consider adding verbiage specific to solar tiles.	See roofing section
2.33	Indeed, solar roofing tiles need their own subsection, or should be considered roofing material as they require special consideration, but foremost function as cladding. Perhaps they should have to meet the same guidelines as non-solar roofing.	Noted
2.33	Perhaps there should be a distinction between new construction/non-contributing structures, and historic/contributing ones.	See roofing section

2.33a	there should be an exception here if the primary, front-facing roof plane has a southward orientation, or if all other roof planes receive minimal light due to shading patterns. Particularly with the Energize Denver requirements that will be in place by 2030, these exceptions will be necessary to help historic homes meet energy efficiency requirements.	Needs further discussion - should solar panels be allowed on the primary, front-facing roof plane if it doesn't damage historic roofing materials? Should a lighting study be required for front-facing roof plane verifying placement on this slope provides maximum solar benefit? Should Commission review be required for all front facing roof plane placement?
2.33a	Are guidelines (a) and (c) saying the same thing/redundant?	If this is revised to allow solar panels on the primary, front-facing roof plane, we will remove guideline (a), pending LPC discussion.
2.33b	Perhaps the panels must be below the top of the parapet, or must not be visible from the public way.	Staff disagrees
2.33c	Consider adding something like "the panel layout where visible should respect the historic roof configuration"	Needs further discussion - staff feels that the proposed language is too vague
2.33d	Need clarification about horizontal and vertical ridges. I'm an architect and not sure what is meant by this terminology.	Staff agrees - will address via a graphic
2.33dii	What is a "vertical ridge"? Hipped roofs can have hips or ridges, but I can't picture anything vertical.	Noted
2.33g	even if it is an historic carriage house facing the street?	Yes, that would be ok - current guideline encourage this approach for secondary structures
General Comment	We support the revision allowing solar panels to be installed on a larger portion of sloping roofs. However, we feel that it would be appropriate for solar 'shingles' to have distinct rules reflecting their relative inconspicuousness and allowing their installation without setbacks from the ridge and eave. We would also support greater leeway for solar panels on low-slope roofs to extend past the parapet on low-slope roofs.	Staff agrees

General Comment	Solar Panels- This is a common issue, and there is significant support to increase flexibility to ensure owners can maximize the performance of panels regardless of the orientation of their home or roof. We'd recommend increased flexibility, even in higher visibility areas, so long as the panels are flush with the roof, removable, and do not cause any long-term damage (especially if the roof is a specialty material like clay tile). We further recommend expressly addressing the increasing availability of solar tiles as a solution.	Needs further discussion - see comments above
Additions		
3.2b	should this refer to aligning with the historic structure being expanded or with random neighboring structures. Might get some unintended results as currently written. Graphics could help clarify intent here.	Noted - Future updates to the guidelines for additions are planned in future phases
3.2b	3.2.b Consider calling for roof eaves of new additions to either align with historic house or be offset by a specified minimum distance. We have seen designs where the addition eaves line are close to historic eaves line but just a little offset.	Noted - Future updates to the guidelines for additions are planned in future phases
New Material Guideline	In consideration of cost impacts and so as not to make additions in historic districts, particularly residential, not economically feasible, consider this requirement for primary façades only or within a certain setback from the primary façade only. Therefore, allow for flexibility in materials and form when located away from the primary façade.	Staff disagrees - cost considerations are not within Landmark purview
New Material Guideline a	This should be clarified that "thin brick veneer" is different than a masonry veneer that is constructed from a single wythe of standard size masonry, which should be allowed.	Staff agrees - will address via a graphic
New Material Guideline a	Very good to see the prohibition on thin bricks!	n/a
New Material Guideline a	Where possible, all openings should be modular with a minimum of cut brick (not sure if this should be in "a" below, incorporate windows, doors and other openings at a ration similar to those in the surrounding historic context, also is there a numbering problem?	Staff disagrees - too complex to regulate and enforce, and this can result in openings that are not proportionate to openings in surrounding historic context.

New Material Guideline a	Note that most brick mounted on precast concrete panels is actually thin brick.	Staff disagrees - thin brick may be mounted on pre-cast panels, but it can also be thin brick veneer installed directly on metal lath. Will clarify our expectations with a graphic
New Material Guideline b	Where possible, all opening should be modular with a minimum of cut stone	Staff disagrees - too complex to regulate and enforce, and this can result in openings that are not proportionate to openings in surrounding historic context.
New Material Guideline c	<p>It seems like 1" might be a more appropriate depth requirement.</p> <p>Here is the design guideline for stucco from Foley, AL for reference: A stucco wall surface is generally about 1" thick and applied in the following 3 coats:</p> <ul style="list-style-type: none"> • The Scratch Coat is approximately 3/8" thick and applied directly to the wall surface. It is forced into the raked joints or pushed into the lath to provide a strong bond. The surface of the scratch coat is deeply cross scratched to allow bonding of the brown coat. • The Brown Coat is also approximately 3/8" thick and finished with a wood float for a smoother surface. • The Finish Coat is generally about 1/4" thick with the overall thickness being determined by the finish style. 	Staff agrees - will update to 7/8" (or 1"?)
New Material Guideline d	We should not be asking for minimal visibility on residential builds for architectural metal. If the metal application meets all other requirements (e.g. matte), it should be permitted to be used in any visible surface, just as it was historically permitted.	Staff disagrees - metal was used historically as ornamentation
New Material Guideline d	The proposed new materials guidelines for architectural metals single out Corten steel to be 'avoided outside of an industrial or commercial context'. This seems arbitrary and unnecessary. Corten steel has an extraordinary lifespan in Colorado's dry climate, and can be detailed with elegance and simplicity. My own studio in Baker features a contemporary interpretation of a historic porch, using Corten, which was approved by the Landmark Preservation Commission. The proposed guideline could deny the Commission the flexibility to approve an appropriate design in Corten.	Needs further discussion with Commission

New Material Guideline e	Suggest prohibiting transparent-finished wood siding unless this was characteristic of the historic context.	Staff disagrees - paint and stained finish of wood not within Landmark purview
New Material Guideline e	I would suggest that the new materials guidelines relating to fiber cement shake and shingle be clarified to state that texture is allowed on these products. There are currently no manufacturers producing smooth-finish fiber cement shake. The Landmark Preservation Commission has routinely approved these products on all facades so long as they've had an 'even edge' installation.	Staff agrees
New Window, Door Guideline	Is this intended to be a new subsection, or a continuation of guideline 3.2?	This is new guideline
New Window & Door Guideline a	This language should be weakened. Passive house standards often require fewer windows on certain faces (north, south) and greater counts of windows on west- and east-facing surfaces. We should not be sacrificing environmental benefits for sake of window counts.	Staff agrees in part - will revise with additional language to discuss flexibility on window design when there is minimal visibility
New Window & Door Guideline a	Clarify that additional flexibility on size and placement of windows and doors possible when there will be no visibility from public vantage points?	Staff agrees
New Window & Door Guideline c	suggest adding "string courses" to the cornice and belt course language.	Staff agrees
New Window & Door Guideline e	Recognizing that prohibition or allowance of vinyl windows may be specific to particular districts... is this addressed in guidelines?	Needs further discussion
New Window & Door Guideline f	Should there be more guidance on when divided light windows would be appropriate on an addition? In the past, Landmark has generally required windows on additions to be simpler than those on the primary residence and has generally discouraged the use of divided light windows on additions to help distinguish them as new construction. Or is this guide applying that divided light windows could be used on any additions?	Needs further discussion
New Window & Door Guideline f	Again a graphic would clarify the guidance here.	Staff agrees - a number of graphics are in process
Infill - Materials, Windows, and Doors		

<p>General Comment on Chapter 4</p>	<p>General concern on additions to non-contributing residences. As a real world example: an addition to a non-contributing late 1940s neo-colonial style house on a block full of Queen Anne style contributing houses. Makes no sense to do a Queen Anne style addition in this case. Similarly makes no sense to use the materials, doors and windows similar to those found in the Queen Anne style. This how can the guidelines address this situation?</p>	<p>Noted - additional updates to guidelines on non-contributing buildings are planned for a future phase</p>
<p>General Comment on Chapter 4</p>	<p>This entire section should be removed. If a building is non-contributing, it should not have to contribute - the building has already established a new history of diversity in the district and should be permitted to continue.</p> <p>Worse, these requirements might lead to a building of a very different style from the rest of the district being forced to use elements of a different historic context from its own, leading to a Frankenstein amalgamation</p>	<p>Noted - additional updates to guidelines on non-contributing buildings are planned for a future phase</p>
<p>4.6a</p>	<p>Where possible, all openings should be modular with a minimum of cut brick incorporate windows, doors and other openings at a ratio similar to those in the surrounding historic context, also is there a numbering problem?</p>	<p>Staff disagrees - too complex to regulate and enforce, and this can result in openings that are not proportionate to openings in surrounding historic context.</p>
<p>4.6b</p>	<p>4.6b Where possible, all opening should be modular with a minimum of cut stone</p>	<p>Staff disagrees - too complex to regulate and enforce, and this can result in openings that are not proportionate to openings in surrounding historic context.</p>
<p>4.6d</p>	<p>We should not be asking for minimal visibility on residential builds for architectural metal. If the metal application meets all other requirements (e.g. matte), it should be permitted to be used in any visible surface, just as it was historically permitted.</p>	<p>Staff disagrees - metal was used historically as ornamentation</p>

4.6 d	The proposed new materials guidelines for architectural metals single out Corten steel to be 'avoided outside of an industrial or commercial context'. This seems arbitrary and unnecessary. Corten steel has an extraordinary lifespan in Colorado's dry climate, and can be detailed with elegance and simplicity. My own studio in Baker features a contemporary interpretation of a historic porch, using Corten, which was approved by the Landmark Preservation Commission. The proposed guideline could deny the Commission the flexibility to approve an appropriate design in Corten.	Needs further discussion
4.6e	There is a lot going on in this guideline. Would suggest splitting it up for clarification. Also think more clarification of guidelines to detail how this material guideline is different from the guideline for additions would be helpful. Especially clarification on texture. Smooth texture siding allowed on all infill but textured siding only allowed in smaller areas with minimal visibility? Also confused about the guidelines for shingle exposure which say 4-6" and then no greater than 6". Is this redundant or am I missing something?	Needs further discussion - while the additions chapter currently references this guideline, we added a guideline on materials for additions. Staff drafted the proposed guidelines so that additions were to have smooth finish only. Will strike "When using cement fiber board or other durable manufacture wood shingles, limit the exposure to no greater than 6".
4.6e	I would suggest that the new materials guidelines relating to fiber cement shake and shingle be clarified to state that texture is allowed on these products. There are currently no manufacturers producing smooth-finish fiber cement shake. The Landmark Preservation Commission has routinely approved these products on all facades so long as they've had an 'even edge' installation.	Staff agrees
4.8d	More flexibility for doors and windows when not visible?	Staff agrees
4.8f	When are divided light windows appropriate for infill construction? In past, Landmark has discouraged the use of divided light windows on new construction, considering it overly replicative and complicated.	Needs further discussion
Garages and Accessory Structures		
4.18a and 4.19	Does it make a difference if the garage or accessory structure is not visible from the public way? Can alleys be considered a public way?	No, alleys are classified as public right-of-way within the City and County of Denver and therefore within Denver Landmark Preservation purview

4.18a	Perhaps (a) should say "Locate and orient a new garage or accessory structure within the typical range of locations and orientations for garages and accessory structures in the surrounding historic context." Then, (b) and (c) can be combined and used as an example.	Needs further discussion - perhaps additional clarity could be added to a to indicated placement should be in the rear under a and then b and c be used as examples. For example: where garages are detached follow that pattern. Where garage are attached follow that pattern
4.18a and 4.18b	a and b seem somewhat redundant	Needs further discussion - perhaps additional clarity could be added to a to indicated placement should be in the rear. B and C seem redundant to many
4.18b	This language should be modified to have a higher bar than "most". Perhaps, for example, more than 80%. Else we'll have situations where the historic buildings include a diversity of options (e.g. 55% facing alley, 45% facing street), and the current language will require additions to match a bare majority, instead of reflecting the real diversity of builds on the street.	Staff disagree
4.18c	Should this read "where most garage structures to differentiate from 4.18b?"	Needs further discussion - perhaps additional clarity could be added to a to indicated placement should be in the rear. B and C seem redundant to many
4.18c	As noted above, the bar should be higher than "most" here - something like 80%+, instead of 51% or more.	Staff disagree
4.18d	Consider "On a corner lot, orient a new garage or accessory structure towards the side street..."	Needs further discussion
4.18e	This should be strengthened, from "avoid making" to "making new curb cuts for driveways or widening existing curb cuts is not permitted".	Staff disagrees - curb cuts are often needed where alleys are not present
4.19	Does it make a difference if the garage or accessory structure is not visible from the public way?	No, alleys are classified as public right-of-way within the City and County of Denver and therefore within Denver Landmark Preservation purview
4.19f	Shouldn't the letters start over?	Staff agrees - yes, typo

4.19g	This guideline should be removed. Denver districts do include 2-story accessory structure with a garage or shed beneath and a residence or storage room above. However, these were typically constructed as one-off homes by wealthier owners. the fact that we did not historically have plentiful wealthier persons building these in every historic district does not mean they should not be permitted in districts that did not already have one example. They match traditional Denver design patterns and thus should be allowed in all historic districts.	Noted, however, the basic building block of the city is defined by the Denver Zoning Code
4.19f and 4.19g	I applaud the guidance in this section but remain concerned it won't be applied in practice. In West Highland we are typically seeing proposals for ADUs that are 2 story and excessively large. Seems the " accessory" in accessory dwelling has been forgotten. Two story structures - ADU over a garage, does not fall within the historic context. However, with our typically smaller lots, the 2 story approach may be the only practical way to provide an ADU. How can the guidelines address this reality?	Noted - additional guidelines on detached ADUs are planned for a future phase
General Comment	We feel that the revisions to the materials guidelines relating to garages and ADUs should be deferred to a later phase when ADU design guidelines are specifically addressed. The public discussion on the Phase 1 materials update did not specifically relate to ADU design guidelines. The neighborhood would generally support greater flexibility and creativity for ADUs than are reflected in the draft design guidelines.	Noted - material guidelines needed now, will re-evaluate with ADU guideline updates for a future phase
New Guideline Materials	It is not reasonable to require that new garages located on the rear of the lot and accessed via alley and therefore of minimal visibility from public viewpoints be constructed of brick or masonry, veneer or otherwise. This has the potential to impose a large cost burden for minimal public / historic value.	Staff disagree - brick is not required, just a possible material. Garages may be constructed of many other materials
New Guideline Materials c	Allowed texture? Hardie offers several different finishes of fiber cement architectural panels. Would all be allowed? Some seem more compatible than others.	Good comment - will add smooth to fiber cement required for panels
New Guideline Material d	Noting again that we should not be restricting architectural metals to minimally visible areas for residential properties if the metals used and applied meet all other requirements	Staff disagrees - metal was used historically as ornamentation

New Guideline Materials i.	Would this require a shed over 250 square feet to be constructed of masonry (or veneer) if the primary structure is?	No - many materials can be used however they must comply with the material guidelines
Sheds		
New Guideline on Sheds a	Historically, sheds were present in street-visible locations on corner lots, so these lots should be excepted.	Staff disagrees
New Guideline on Sheds b	Design a shed to be subordinate to the primary structure?	Staff agrees
Sustainability of New or Non-Contributing Buildings		
General Comment	The proposed revisions to 'Sustainability of new or non-contributing buildings' should be coordinated with recently adopted Denver Building Department requirements for solar-ready roof area on new homes. Restrictions on the roof area available for solar could prevent a new structure from meeting the minimum solar-ready requirement.	Needs further research
4.32	non-contributing building addition should be removed. These buildings are non-contributing and thus should not be required to follow these guidelines.	Staff disagrees - Landmark purview extends to all buildings undergoing exterior alterations that require a building or zoning permit in a historic district
4.32	I don't know where it should go but should additions be configured to preserve the solar access of adjacent properties? Should a 2-story addition or a second story addition be restricted to prevent shading adjacent single story properties?	Not within landmark purview
4.32b	As noted earlier, the guideline to match window counts and locations to historic buildings reduces the buildings' capability to meet passive house requirements. Thus, these guidelines are internally conflicting.	Staff disagrees
Landscaping		
5.3	Consider if residential accessibility ramps should be specifically addressed. I suggest this is very much needed.	Noted - additional guidelines on accessibility are planed for a future phase

5.3g	Is this a reference to only poured concrete, or also flagstone or other pavers? patios and other front seating and walking areas supported by pavers, brickwork, or flagstone do match with historic construction in Denver, even at quite high ratios for areas that traditionally had less landscaping. So this update should either clarify that it refers to poured concrete or be removed.	Staff agrees - no permeable surfaces clarification needed
5.3k	The addition of small berms can help with water direction and retention for trees in the ROW, so we should not discourage berms in the ROW	ROW not within landmark purview
5.5a	I don't think retaining walls on either side of a individually listed property should be allowed on streets where the Denver Hill is a character-defining feature.	Staff agrees
5.5a	Not sure why "historic district or characteristic of the block" has been removed. As written, couldn't this lead to a patchwork situation?	Staff disagree - a desire for more flexibility for historic districts has been communicated to Landmark staff by the public
Fences		
5.9d	Should it be clarified that while fencing should follow traditional patterns it should not be overly ornate or complex, especially when the design/complexity does not fit with the historic structure/district. Fencing should not overwhelm the historic building and should be visually subordinate.	Staff agrees - traditional or simple
5.9f	How will the guidelines deal with side yard fences on corner lots?	Noted - Staff are using DZC definitions of fencing. Anything behind the primary façade is considered a rear yard fence. Anything forward of the primary façade is a front yard fence. Side yard terminology not used in the DZC. Will add a call out box to further explain terminology used. Corner lots will be treated the same as all lots
Retaining Walls		

5.12e	This guideline appears to be allowing the use of pavestone or similar tinted, rough faced, modular concrete blocks that are installed without mortar. I do not think that these are appropriate for use within historic districts due to their size and scale. They do not blend with the district.	Need further discussion - definition and graphic
5.12e	I think the use of railroad ties should be discouraged.	Staff disagree - staff had an in-depth conversation of the use of railroad ties. Staff ultimately felt that the use of railroad ties may be appropriate if the surrounding contexts supports the use of the material. Additionally, staff discussed the reversibility of such retaining wall materials and the low impact that it would have on the historic integrity of the district as a whole.
5.12h	Products like Pavestone come in both rectilinear and trapezoidal options but this look pretty similar once installed. I think that more guidance is needed on what types of landscaping blocks are allowed.	Needs further discussion - we may need to better flesh out the definition of trapezoidal retaining wall blocks to trapezoidal retaining wall blocks with arched fronts? And include an image of this type of block in our guidelines for reference.
General Comment	Retaining Walls & Fences- This section should more clearly distinguish between historic districts with different contexts. What may be appropriate and approvable along a historic parkway is different than the context in a neighborhood where front-yard fences are character-defining features. Consider having the guidelines highlight the importance of the district-specific context, and the character-defining feature chapters.	Staff disagree - based on CDFs and district designations
Building and Site Lighting		
5.20a	This conflicts with municipal land use planning guidance suggesting that we should be adding pedestrian-scale lighting on and along pedestrian thoroughfares. These additions are essential for street-level safety. The strength of the statement ("whenever possible") is likely to negate any attempts to meet this planning guidance, even when context-appropriate lighting is used.	ROW not within landmark purview

5.23a	Seems like you want to limit lighting to the first level of the residential building. Ground level might be misinterpreted to mean low level lights like you see at steps or ramps.	Staff agrees
5.24a	"Warm light" needs to be defined. 3400K to 5000K.	Staff agrees
General Comment	Lighting- We appreciate the simplification of landscaping guidelines given the purview of the Landmark Commission. We'd support removing the details regarding sidewalk and landscape lighting as well, as these items do not create long-term impacts on the historic structures and light-levels and light-pollution is regulated by the city through other means.	Staff disagrees - this items require a permit and therefore guidelines are needed to guide appropriate placement and to prevent up lighting
Solar Panels and Solar Roofing		
New Guideline Comment	Is this intended to be in chapter 5? seems redundant to earlier sections such as 2.33. Consider if this would be appropriate for chapter 5 if verbiage on ground mounted panels is added.	Yes, refers to solar panels and solar roofing (last page), new guideline to augment existing, may be relocated in a later phase
General Comments not pertaining to a Specific Section		
	We are concerned that the draft as it currently is written may exacerbate unintended consequences of the 2014/2016 design guideline update, as that update was also more detailed and specific than earlier guidelines, which has led to some frustration on the part of owners in long-time districts, and decreased flexibility to identify site and context-specific solutions. As an example, we suggest talking more about the intent related to material selection for ADUs and out-buildings, rather than listing appropriate or inappropriate materials specifically.	Needs explanation during LPC presentation
	We also encourage you to include reference to any existing-custom design guidelines or the appendices outlining the character-defining features of each historic district, and whether there are differences between those documents and the draft guidelines	Staff agrees

	<p>Additions, Infill & Non-Contributing Buildings - This is a section where intent statements in the guidelines are more important than the details on materials. As drafted, it feels quite prescriptive, given the diversity of historic districts existing in the city today and the evolving material technologies. As the goal of new construction in historic districts is not to create a “faux-historic” feel, requiring only certain types of siding or installation techniques is not necessary. The scale and mass are far more significant.</p>	<p>Staff disagrees - further updates to these section in future phases</p>
	<p>The same is true for sheds, ADU’s smaller out-buildings. It will be important to note when a permit is and isn’t required for these structures, and given their reversibility, flexibility on materials is appropriate. Additionally, the prohibition against certain materials, such as plastic or vinyl, may be confusing in districts with custom-design guidelines that would allow these materials.</p>	<p>Staff disagrees - further updates to these section in future phases</p>
	<p>Accessibility- It would be helpful to provide some guidance, and clearly signal, that accessibility improvements, such as ramps, are appropriate and any considerations that make them most successful.</p>	<p>Future ADA updates planned in phase 2</p>
<p>test</p>		<p>no comment</p>