This document is the staff’s comparison of the Secretary of the Interiors 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

LPC Meeting: July 23, 2024
Staff: Becca Dierschow
Discussion Item: Designation Application and Designation Customer Guide

Project Scope for Discussion Item:
This discussion item was first brought to the Commission on July 9th 2024. At this meeting, Commissioners had insightful comments on the Designation Customer Guide and designation applications. One of the primary areas of conversation centered around contributing and noncontributing features for individual Landmarks. Currently the application and designation guide require alterations (such as infilled porches, additions, etc) to be listed as either contributing or noncontributing to the designation. However, the Commission believed this requirement was overly complicated and prescriptive. As an alternative, the Commission suggested that these alterations be listed, with their dates of construction, under the Property Description. This change would keep the information about alterations in the designation application, but would not necessarily make a determination of contributing or noncontributing.

Landmark staff has made the recommended changes to both the designation customer guide and the designation application. Staff also made minor edits to the guides, cleaning up stray typos and formatting issues.

The Commission also recommended that the guide and other information about the application process be easily accessible on the City of Denver’s website, to make it more accessible for the public. Landmark staff will work with Communications staff to ensure that the guide is easily available online and widely disseminated. Landmark staff will also work to ensure that information about the benefits of designation (such as access to rehabilitation tax credits) are available on our website.

Previous Staff Report recap:
In 2018-2019, Landmark staff convened a taskforce to review the Landmark Ordinance - Chapter 30 of the Denver Revised Municipal Code (“Chapter 30”). The taskforce was made up of members of City Council, preservation professionals, local developers, and members of the public. One goal of the taskforce was to update the Landmark ordinance to address community and council concerns about the designation process in Denver, including demolition review, owner-opposed designation, and the criteria for designation. During this process, the significance criteria for designation were updated to include three new criteria covering cultural significance. The intent of adding these criteria was to encourage designation of structures that may be culturally significant to a community, but which may have previously been unrecognized. Additionally, the taskforce recommended that staff put together a designation customer guide to help applicants apply for designation and reduce barriers to designation.

At this time, minor changes were made to the designation application. These changes included adding a “resources table”, providing a template inventory table for historic districts and updating guidance about architectural descriptions. The architectural description was simplified to remove the requirement for a façade by façade description of all
features when high quality photographs are available for all façades of the building. These three changes were made
directly in response to the Taskforce’s comments and were designed to simplify the application process.

In 2020, Landmark staff began drafting a customer guide. This guide was aimed at two audiences: community
members new to preservation, as well as preservation professionals who had written designation applications
previously. The aim of the guide is to provide a template for community members seeking designation, while providing
clear expectations for designation applications. In some cases, designation applications cannot be amended after
submission, so staff hopes this guide will inform applicants of the required information for a complete and sufficient
application.

Staff reviewed National Register Bulletins #15 and 16, which provide guidance on applying National Register criteria
and filling out the National Register nomination form. This national guidance informed the Denver designation
customer guide in many areas, especially the assessment of integrity. Staff also looked at peer cities such as New
York, San Francisco and Austin to determine what guidance these cities provide applicants. Staff did not find any
comprehensive guides to writing designation applications, though many municipalities (including Denver) have
information about how to research historic properties. Additionally, many municipalities have detailed information
about the process of designation. Thus, it appears that there is a gap in information available for community
members who may wish to write a designation application but do not have technical or professional familiarity with
historic preservation and concepts of historic integrity, periods of significance, historic contexts and significance
criteria. This designation customer guide is aimed to provide that information in a clear and straightforward manner,
while encouraging high-quality, well-researched designation applications.

In 2022, Landmark staff met with community stakeholders including: Historic Denver, community members and
preservation consultants. At these meetings, staff discussed the existing designation application, collated common
questions that arose when writing designation applications, and provided a draft designation guide for review. Staff
incorporated many of the comments received at these meetings into future drafts of the guide. Staff also utilized
Commission deliberation on designations – both those that have been approved and those that have been denied –
to inform the guide.

Additionally, in 2022, the entire Landmark staff reviewed the designation customer guide, providing comments and
feedback over several different meetings. At this point, it was determined that there should be two guides – one for
individual landmarks and one for historic districts. While the content for the two guides is the same for many sections,
there are additional requirements for historic districts (such as the inventory tables) that require additional explanation.

One important component of the guides is the layout of the document. In late 2023, Landmark worked with an outside
consultant to format the guides, providing easy reading and screen-reader accessibility. These guides follow the
designation application step by step, providing guidance on filling out the application, definitions of key preservation
terms (such as “integrity” and “historic context”) and suggested formats for writing sections. The use of graphics to
illustrate specific concepts such as “resources” and character defining features, call out boxes and “compare and
contrast” sections provide visual interest and prevent the document from being visually overwhelming.

Note: this designation customer guide and updated designation application does not alter the requirements for
Landmark designation as laid out in Chapter 30-3, or alter the designation process as outlined in Chapter 30-4.
Therefore, the adoption of the application and designation guide does not need to follow formal rule-making
procedures, which would require a formal public hearing. However, staff would like the Landmark Preservation
Commission to review both documents. This will also allow the public to provide comment through the Commission’s
standard public comment policy. Thus, the Commission first saw the designation customer guide and updated
designation application as a discussion item on July 9th, which was followed by a second discussion item at today’s
LPC meeting. The updated application and customer guide will be effective one week following the July 23rd meeting,
barring any major concerns from the Commission.