

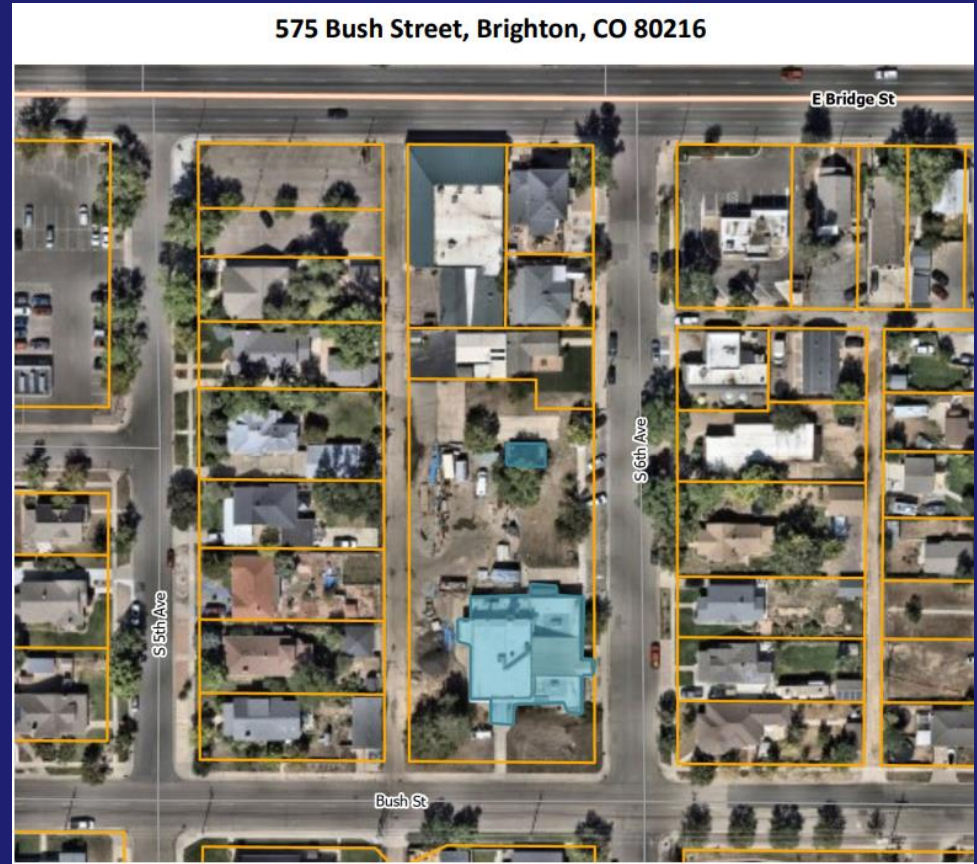
575 Bush Street – Brighton Town Hall Certificate of Appropriateness Appeal of the HPC Decision

City Council – April 21, 2026

Applicant:	Pearce Miller, City of Brighton
Property Owner:	City of Brighton
City Staff Representative:	Emma Lane, AICP, Senior Planner – Historic Preservation
HPC Representative:	Valerie Cooper-Whitney, AIA, NCARB

Subject Property Location

- The Property is generally located to the south of East Bridge Street, to the north of Bush Street, to the west of South 6th Avenue, and to the east of South 5th Avenue.



Aerial Map

Purpose

- The request is to consider an appeal of the HPC decision to deny a Certificate of Appropriateness for the Total Demolition of the principal structure on the site of the first Brighton Town Hall.

Process

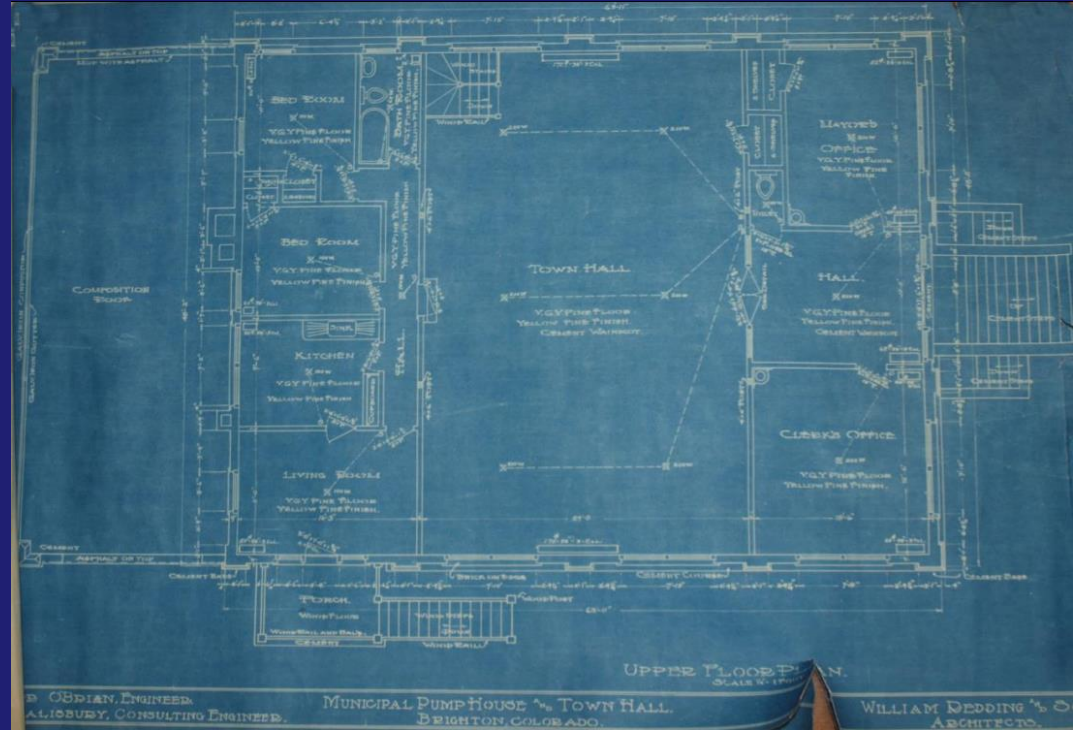
- An appeal of the HPC decision shall be heard by the City Council through a public hearing process.
- Staff used the review criteria outlined in the *Land Use & Development Code* Section 10.03. D. to review the proposal.



Historic View –
Before 1939

Background

- The Brighton Town Hall was built in 1919 and was the first building built specifically for municipal purposes in Brighton.
- Housed the mayor and clerk's offices, the Council Chambers which doubled as a community room, the pump house, and several wells dedicated by Daniel Carmichael.
- Several uses, including the City's library and the City's first Senior Center, were housed in the structure.
- Property was nominated for designation in 2014 by the HPC.



Original Blueprints

Land Use & Development Code

COA Criteria 1-4

In making its decision, the reviewing body shall use the following criteria from Section 10.03 D. 2. e. (COA Criteria):

1. The effect upon the character of the historic landmark, and/or the historic district does not detract from the categories under which the landmark was designated;
2. The architectural style, arrangement, texture, and material used on the historic landmark and their relation to and compatibility with one another is historically appropriate and consistent with the surrounding cultural resources;
3. The size of the proposed structure, if applicable, the setbacks, location, and the appropriateness thereof, when compared to the existing historic landmark and site do not adversely affect the scale of surrounding cultural resources;
4. The proposed work does not significantly change, destroy, or otherwise impact the character defining features of the structure upon which work is proposed;

Land Use & Development Code

COA Criteria 1 – Original Designation Criteria

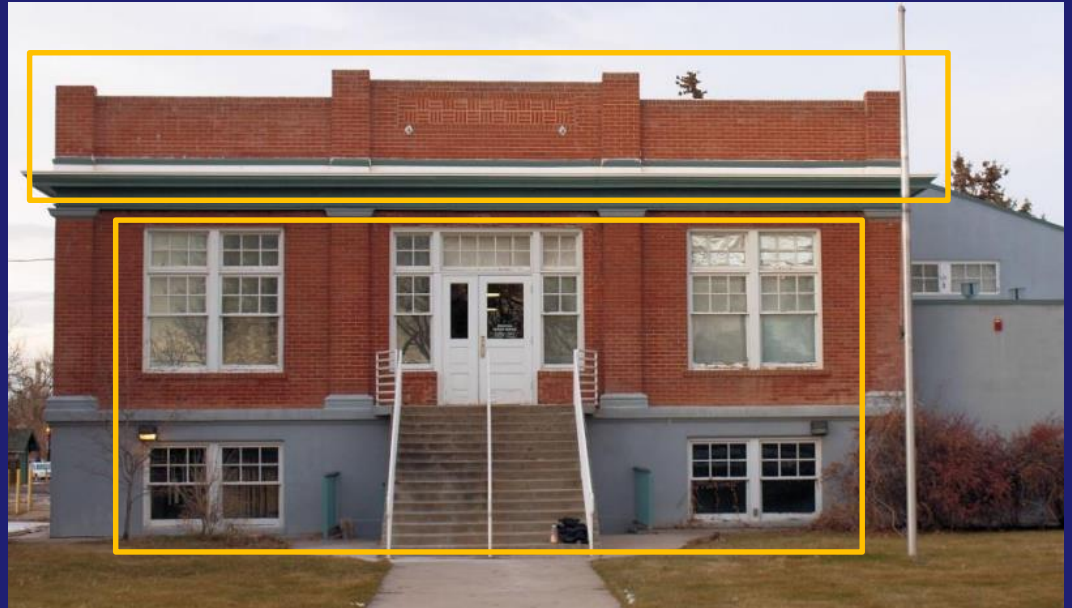
- **Architectural Category:**
 2. Is an example of the work of an architect or builder who is recognized for expertise nationally, state-wide, regionally, or locally
- **Social and Historic Category:**
 2. Exemplifies cultural, political, economic or social heritage of the community
 3. Represents a built environment of a group of people in an era of history
 4. Has significant character, interest or value, as part of the development, heritage or cultural characteristics of the City, State, or Nation
 5. Has an association with a notable person or the work of a notable person
- **Geographical Category:**
 1. Enhances a sense of identity of the community
 3. Is unique in its location of singular physical characteristics
 5. Is an established and familiar mutual setting or visual feature of the community

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COA Criteria 2-4 Analysis



Hotel Boulderado – Designed
by William Redding



Front View – Character-Defining Features

Land Use & Development Code

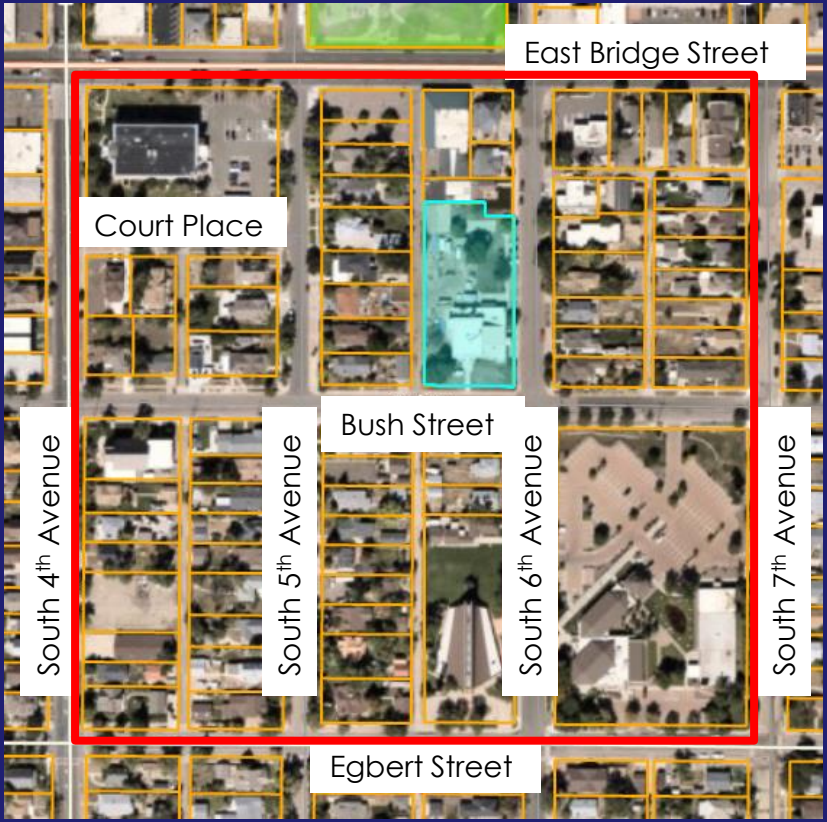
COA Criteria 5-8

In making its decision, the reviewing body shall use the following criteria from Section 10.03 D. 2. e. (COA Criteria):

5. The condition of existing improvements is not a hazard to public health and safety;
6. The proposed work will protect, preserve, enhance, and perpetuate the use of the historic landmark or historic district;
7. The proposed alterations are in compliance with the United States Secretary of the Interior's Standards for Rehabilitation and Guidelines of Rehabilitating Historic Buildings, a section of the Secretary of the Interior's Standards for Historic Preservation Projects, of the Department of the Interior Regulations (36 C.F.R. Part 67, Historic Preservation Certifications), as may be amended from time to time; and
8. The proposed alterations are in compliance with other rules and guidelines as may be recommended by the Historic Preservation Commission and approved by the City Council for alterations to a historic landmark or historic district.

Land Use & Development Code

COA Criteria 5-8 Analysis



THE SECRETARY OF THE INTERIOR'S **STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES** WITH **GUIDELINES FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS**

Secretary of the Interior's Standards

Calls for Service Area

Land Use & Development Code

Demolition Criteria i-iv

In making its decision, the reviewing body shall also use the following criteria from Section 10.03 D. 6. a. (1) (Demolition Criteria):

- i. The historic landmark proposed for demolition is not structurally sound despite documented evidence of the owner's efforts to properly maintain the structure;
- ii. The historic landmark cannot be rehabilitated or reused on the site to provide for any reasonable beneficial use of the property;
- iii. The historic landmark cannot be practically moved to another site in the community; and,
- iv. The applicant can demonstrate that the proposal mitigates, to the greatest extent possible, the following:
 - a. Any impacts that occur to the visual character of the neighborhood where the demolition is proposed to occur;
 - b. Any impact on the historic importance of other cultural resources located on the property and adjacent properties; and
 - c. Any impact to the architectural integrity of other cultural resources located on the property and adjacent properties.

Land Use & Development Code

Demolition Criteria i-iv Analysis



Roof of Addition –
Replaced in 2013
(left photo)



West Area Well –
No area drain
(right photo)



Extent of structural
deterioration on
original building
(bottom two photos)

Land Use & Development Code

Exemptions (LUDC Section 10.03 D. 7.)

- Staff finds that the request for total demolition does not conform to the applicable COA criteria in Sections 10.03 D. 2. e. (COA Criteria) and 10.03 D. 6. a. (1) (Demolition Criteria).
- As such, the applicant has requested an exemption from the COA requirements:

If a COA has been denied, or the application for a COA does not conform to the applicable criteria, an applicant may request demolition pursuant to a Certificate of Exemption from the denial and/or requirements, provided that the intent and purpose of this Section is not significantly compromised, and provided that adequate documentation is submitted to the Historic Preservation Commission, either in writing or by testimony, to establish qualification for one of the exemptions:

Land Use & Development Code

Exemptions

- (1) Economic hardship exemption. An economic hardship exemption may be granted if:
 - a. For investment or income-producing properties, the owner is unable to obtain a reasonable return on investment in the present condition of the historic landmark;
 - b. For non-income-producing properties, the owner is unable to resell the property in its current condition; or,
 - c. The economic hardship claimed is not self-imposed.

- (2) Health/safety hardship exemption. An applicant requesting an exemption based on health/safety hardship must show that the application of the Certificate of Appropriateness criteria creates a situation substantially inadequate to meet the applicant's needs because of specific health and/or safety issues.

- (3) Inability to use. Three years after denial of a demolition permit, if no feasible use or ownership is found for the structure, the owner may request a waiver of all or a part of the restraint of demolition.

Land Use & Development Code

Exemption Documentation and Testimony

- b. The applicant must provide adequate documentation and/or testimony to establish, to the satisfaction of the Historic Preservation Commission, qualification for one of the listed exemptions:
 - (1) The data provided by the applicant must be substantiated by either professionals in an applicable field or by thorough documentation of how the information was obtained.
 - (2) The Historic Preservation Commission may request additional information from the applicant as necessary to make informed decisions.

Land Use & Development Code

Exemption Factors to Consider

- c. The Historic Preservation Commission shall include the following factors in its consideration of the request:
 - (1) Documented evidence of applications and written correspondence, including written consultations, illustrating efforts made by the property owner to comply with this Section and/or make the necessary repairs;
 - (2) Efforts of the applicant to find an appropriate user or to find a purchaser for the property; and,
 - (3) The adequacy of the applicant's efforts to locate available assistance for complying with this Section and/or making the property functional without demolition.

Public Notice and Comment

- On April 3, 2026
 - ✓ While not required under the LUDC, courtesy mailed notice was sent to adjacent properties
- Staff has not received any formal comments in advance of this hearing

Summary of Findings

- ✓ Staff reviewed this project and found the application does not conform to the applicable COA criteria. The HPC evaluated the Certificate of Exemption criteria.
- ✓ On February 19, 2026, the Historic Preservation Commission heard the application through a public hearing and unanimously voted to deny the application.
- ✓ On March 12, 2026, the applicant filed an appeal of the Historic Preservation Commission decision.

Options for the City Council

- Uphold the decision of the Historic Preservation Commission;
- Approve the application;
- Approve the application with conditions; or
- Deny the application.

Historic Preservation Commission Presentation

City Council – April 21, 2026

HPC Representative: Valerie Cooper-Whitney, AIA, NCARB



Valerie Cooper-Whitney, AIA, NCARB

Architect & Preservation Specialist

Anderson Hallas Architects

Historic Preservation Commission Chair

HPC Decision

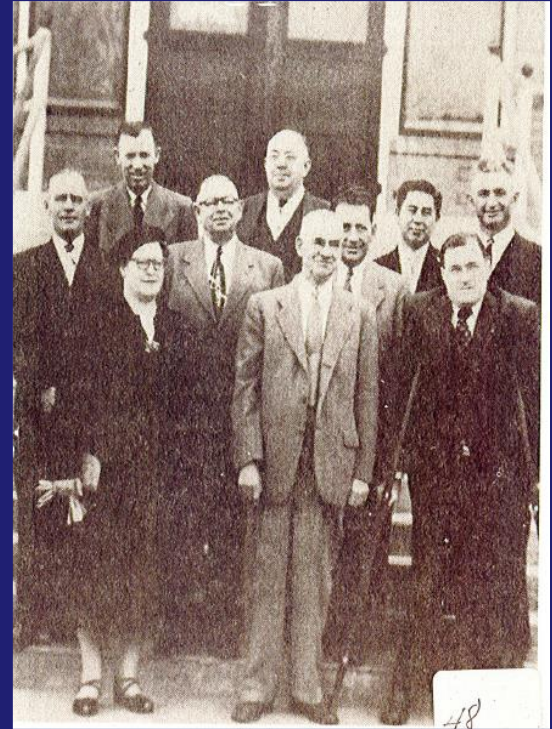
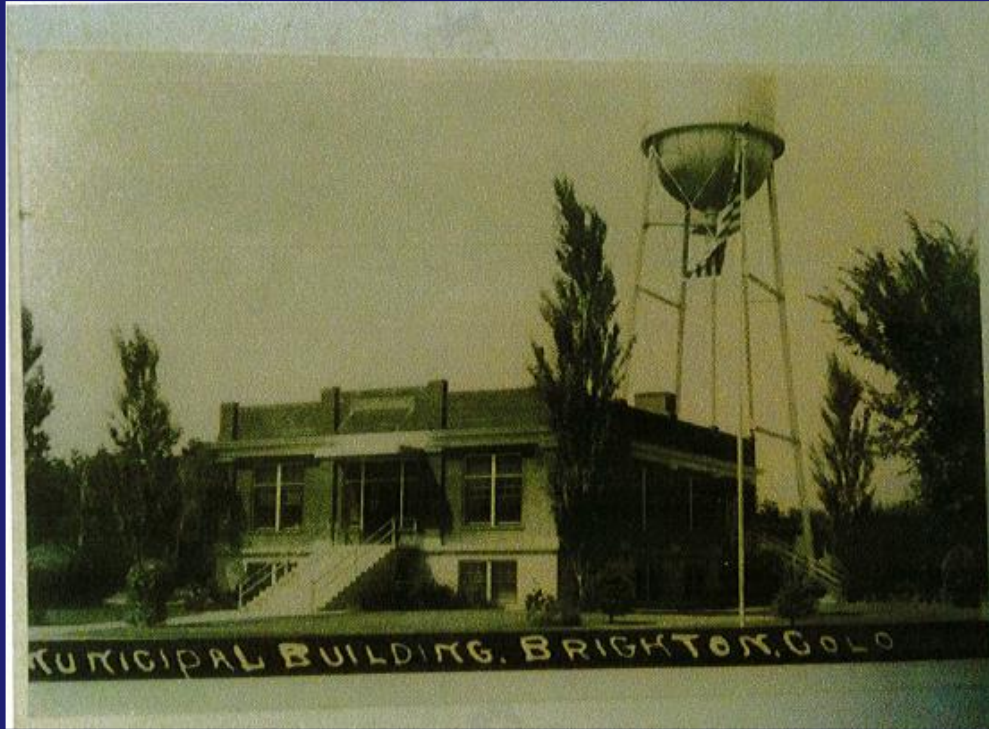
Land Use & Development Code

10.03 Policy and Intent



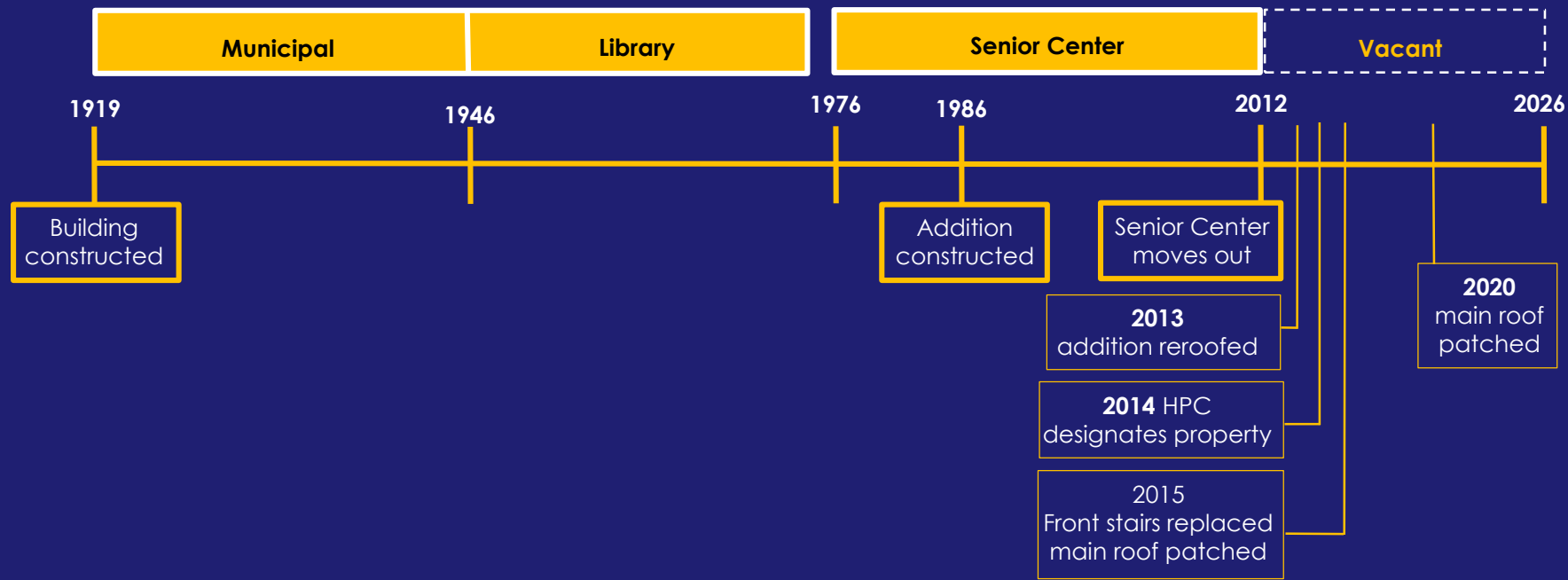
Historic Downtown Brighton

Demolition Criteria i-iv

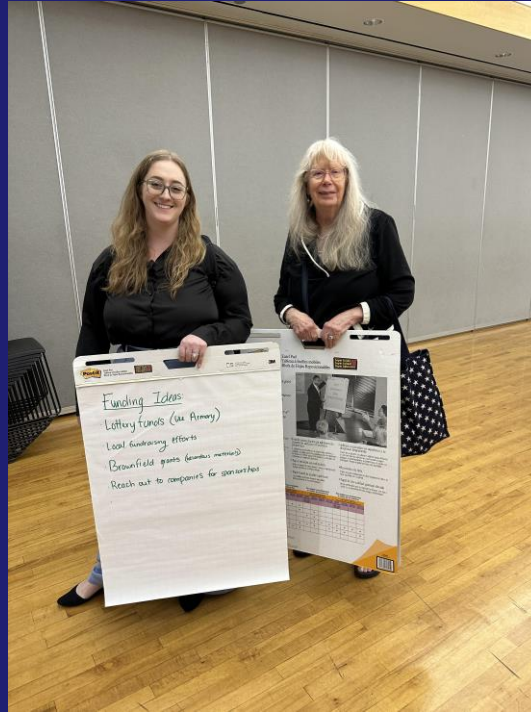


Exemption 1 – Economic Hardship

Timeline



Exemption 1 – Economic Hardship Outreach



Outreach Committee Meeting
March 23, 2026

BRIGHTON
HISTORIC
PRESERVATION
COMMISSION

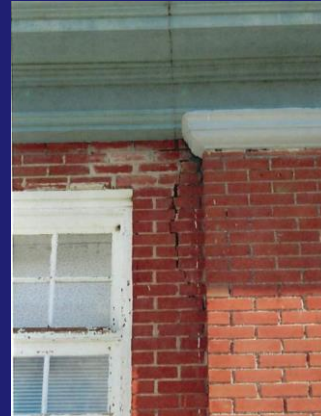
Exemption 2 – (Health) & Safety



Base of north column at base



Roof framing at original building



Cracks in brick wall



Windows at west porch

Exemption 2 – Health & (Safety)



Exemption 3 – Inability to Use

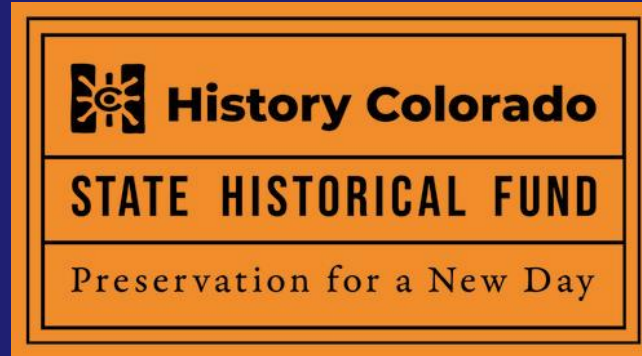
This exemption is not applicable as there has been no denial of a demolition permit.

Potential Solutions

Grants & Tax Credits



Brownfield Grants



State Historic Fund Grants



State Tax Credits

And many more!

Grants & Tax Credits in Brighton



Bromley Koizuma-Hishinuma Farm

Master Plan & Historic Structure Assessment
Exterior Rehabilitation & Roof Replacement
Preservation & Reconstruction
Interior Rehabilitation

\$670,000 in grants

Brighton High School

Window Replacement

\$67,500 in grants



Old Bones, New Life



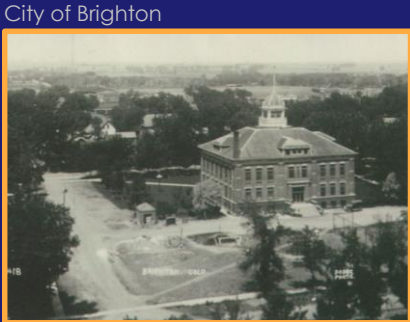
Armory



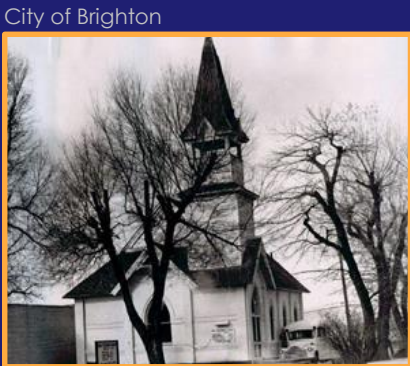
Bromley Koizuma-Hishinuma Farm



Depot



Historic City Hall



1886 Church

City of Brighton

City of Brighton

History Colorado

Left four photo source: City of Brighton