



# Staff Report

**Meeting Date:** February 13, 2025

**Planner:** Sara Dusenberry,  
Senior Planner

**APPLICATION SUMMARY:**

**Project Name:** Exterior modifications to the east exterior wall and roof

**Case Number:** COA24-0009

**Application Types:** Certificate of Appropriateness (COA)

**Location:** 2659 W. Main Street

**Applicant:** Charlie Jones, Earth Saving Solutions

**Owners:** BAB, LLC

**Applicant Request:** Request for a Certificate of Appropriateness to allow for replacement of siding and doors, increase of roof height, and shifting of a portion of the east exterior wall.

**HISTORIC DISTRICT SUMMARY:**

**Historic Building Name:** Bradford Auto Body

**Individual Landmark Designation:** No

**Historic District:** Yes

**Applicable Design Guidelines:** Downtown Littleton Historic Preservation Design Guidelines

**PROCESS:**

Per Section 10-9-8.1 of the Unified Land Use Code (“ULUC”), titled Certificate of Appropriateness (COA), before carrying out any new construction, alteration, relocation, or demolition involving the exterior of any designated landmark or property in a historic district (including non-contributing properties), the owner(s) shall submit the proposed work to the Director, as well as apply for any other required permits.

The ULUC distinguishes between Major Changes and Minor Alterations. Projects that qualify as Major Changes must obtain a COA from the historical preservation board after submitting the proposed work to the Director. As this application includes “new construction in a historic district [and] modification of or to the front or side façade of a principal structure,” it qualifies as a Major Change. As such, the final determination for this Certificate of Appropriateness must be approved by the Historical Preservation Commission in a public hearing.

**LOCATION:**

2659 W. Main Street is located along the north side of W. Main Street between S. Curtice Street and S. Santa Fe Drive and is zoned Downtown Main Street (DMS).

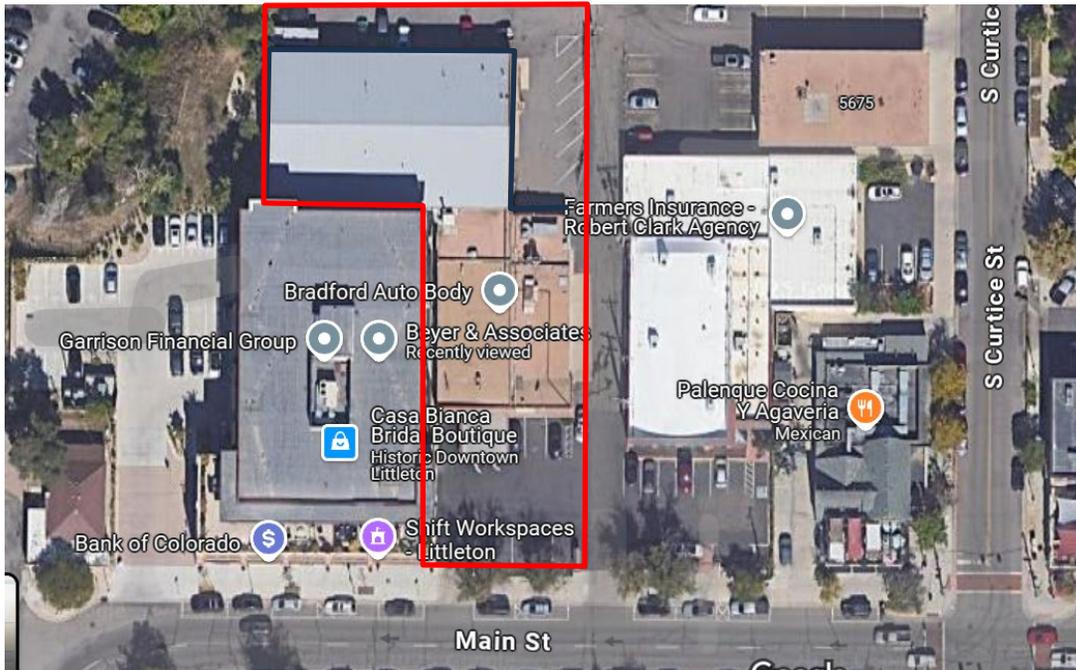


Figure 1: Aerial photo of 2659 W. Main St. with property designated by red bounding box.

**PUBLIC NOTICE REQUIREMENTS AND PROCESS:**

Pursuant to Section 10-9-3.5 of the ULUC, notice of public hearings shall be given in accordance with Table 10-9-3.9.1, which states, in part, for the relevant applications before the Board:

Table 10-9-3.9.1 Development Review Summary							
Development Application	Pre-App Required	Neighborhood Meeting	Review and Decision		Public Notice	Expiration (10-9-3.8)	Applicable Standards
			Review/Recommend	Decide			
CDD = Community Development Director; PC = Planning Commission; CC = City Council; HPB = Historical Preservation Board; BOA = Board of Adjustment; BBoA = Building Board of Appeals; [ ] = Public Hearing Required							
Historic Preservation Applications							
Certificate of Appropriateness (Sec. 10-9-8.1)	✓		CDD	[HPB]	M Po	1 year	Chapter 8

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 Pu = Published in newspaper 10 days prior to public hearing in accordance with Section 10-9-3.5  
 Po = Sign posted on property 10 days prior to public hearing in accordance with Section 10-9-3.5  
 M = Mailed notice to adjoining property owners or property owners within a specified distance of the subject property 10 days prior to public hearing in accordance with Section 10-9-3.5

Section 10-9-3.5 of the ULUC requires that any notice provided by mail, shall be provided through the United States Postal Service to all addresses, units, and property owners located within 700 feet of the property. If there are any homeowner’s or other owner associations within 700 feet of the property, then notification need only be sent to the association’s designee.

In accordance with the ULUC provisions regarding public notice, staff notified all addresses, units, and individual property owners and residents within 700 feet of the site at least ten (10) days in advance of the February 13, 2025 hearing date.

**PROPERTY HISTORY:**

- 1955** Year of construction, Roth Motor Company
- 1959** Bradford Auto Body Co. Opens
- June 2024** Roof and wall collapse
- November 2024** Planning staff noted proposed changes in building permit submittal
- December 2024** Applicant applies for Certificate of Appropriateness (COA)

**BACKGROUND:**

The Bradford Auto Body building at 2659 W. Main St was constructed in 1955. Originally operated as the Roth Motor Company, this property is part of Downtown Littleton's automobile centered history that included uses like dealerships and service stations. Bradford Auto Body opened in 1959 and has been operating continuously from this location.



*Figure 2: Survey Photo of 2659 W. Main St*

In June 2024, the property suffered a roof collapse as a result of increased weight from material storage during a roof repair project. The collapse affected a portion of the east exterior wall. A demolition permit was immediately issued for the roof and exterior wall due to eminent life safety concerns to restore the roof elements and wall damaged. The applicant is unable to restore the building to its existing condition, due to the existing siding no longer being manufactured and updated federal regulations for paint booths. This project requires a COA to rebuild the roof and exterior wall as close to the original appearance as possible, within current regulations and is categorized as a “Major Change” under Section 10-9-8.1.

The auto body use on the property is currently considered legally nonconforming. The updated zoning code no longer allows for auto body repair services in the Downtown District; however, pursuant to Section 10-10-1.1 of the ULUC, the lawful use and location of any nonconformity existing as of the effective date of the ULUC may continue. As such, Bradford Auto Body was allowed to remain in operation. However, the proposed work within the COA may require certain nonconformities to come into compliance with the ULUC.

Pursuant to Section 10-10-1.1.B, there “shall be no enlargement, extension, or intensification of a nonconformity except within the provisions of this Code, as articulated in Article 10-10-3.” The

proposed work does constitute an “enlargement, extension, or intensification,” but is allowed as stated in Article Table 10-10-3.1, which indicates the minimum level of reinvestment that may occur that will trigger compliance with the regulations of this Article. The changes proposed constitute a “Minor expansion” per Table 10-10-3.1, as detailed here:

> ARTICLE 10-10-3 COMPLIANCE

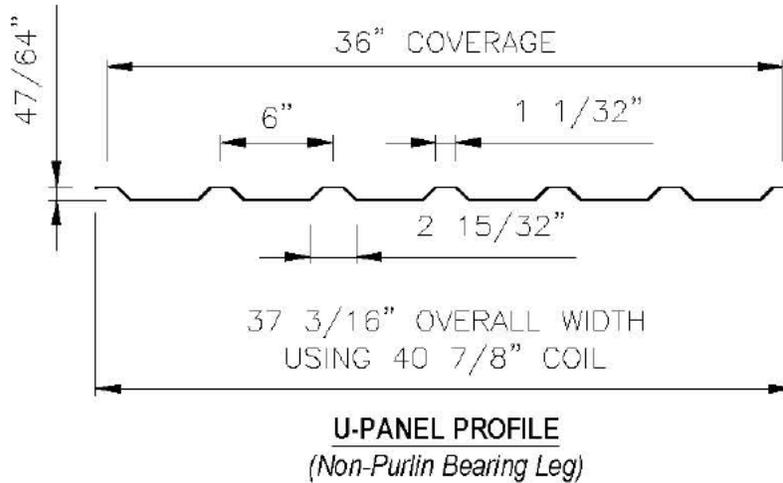
Table 10-10-3.1 Administrative Compliance Requirements		
Type of Improvement	Definition of Improvement	Level of Compliance that is Required
Minor expansions	Expansion of a building by less than 50 percent of its gross floor area or an increase in parking requirements of 50 percent or less.	<ol style="list-style-type: none"> <li>1. New parking spaces (including ADA accessible spaces) and drive aisles shall be dimensioned provided the new dimensions will not be detrimental to safe circulation when combined with the existing lot.</li> <li>2. Landscaping improvements shall be provided for those portions of the site being expanded.</li> <li>3. Minor nonconforming uses shall be discontinued.</li> <li>4. If height is increased by more than 20 percent within 50 feet of a district boundary line or if the expansion reduces the dimension between the building and a district boundary line, bufferyards shall be brought into compliance.</li> <li>5. Sidewalk / tree lawn compliance shall be evaluated and may be required at the discretion of the Director.</li> <li>6. Site lighting requirements shall be evaluated and may be required at the discretion of the Director.</li> </ol>

The proposed changes either meet or do not trigger the required levels of compliance referenced in the chart above (nos. 1 through 6) and therefore, the proposed changes within the COA are permitted under the ULUC as it relates to nonconformities.

**APPLICATION DETAIL**

The application’s primary intent is to rebuild the roof and exterior wall as close to the original appearance as possible, within current regulations. The property includes the original building and a large addition, noted as building 2. Only the original building was affected by the collapse, and the application only addresses the east elevation and roof of this original building. Due to the eastern wall collapse, the garage doors and siding will need to be replaced. The applicant noted the doors will be replace in-kind, but both the material specification sheet and elevations show two slightly different window configurations from the original, and each other. In order to be considered an in-kind replacement, the doors will need to match the original and include 6 fixed lite windows. The proposed COA indicates that the elevations show two fixed lite windows and the specification sheet shows 8 fixed lite windows.

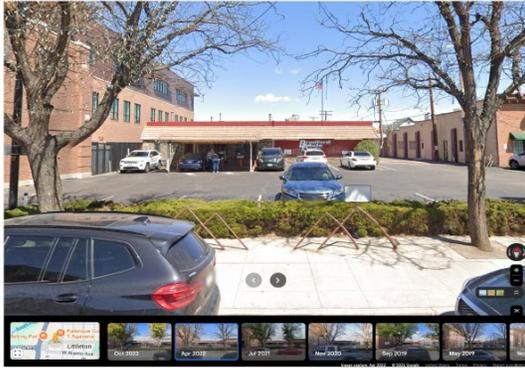
The siding on the east exterior wall was removed due to the collapse. The original siding was metal and meant to imitate vertical wood siding with a grain texture. The applicant noted this type of siding is no longer manufactured. The proposed siding will match what is on building two and the parapet wall along the front façade of the original building. The proposed siding is a U-Panel design and will be similar in color to what was previously on the building but will be a different profile.



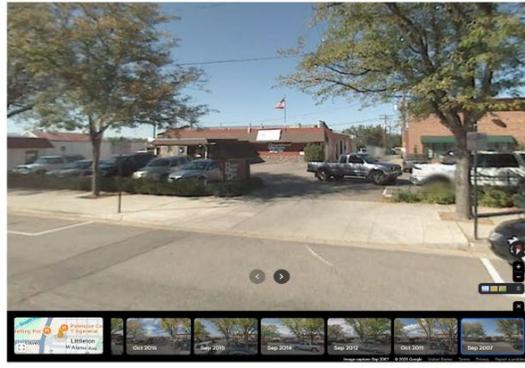
*Figure 3: Proposed siding profile on 2659 W. Main St.*

The collapse and reconstruction of the roof and eastern wall is triggering compliance with current Environmental Protection Agency (“EPA”) requirements for automobile paint booths. To meet these EPA requirements, a larger paint booth must be installed. The applicant is proposing to install a pre-fabricated booth, that will result in an increase in roof height and a shift to the east exterior wall by about 1.25ft. To maintain as much of the original form of the building as possible, the increase in height and wall shift will only affect the portion of the building that contains the booth. The booth will be in the fifth bay from the front of the building. The new booth is proposed to be 19ft-9in tall, this is an increase of 6ft over the original building height. Additionally, the required roof equipment will project beyond the parapet of the paint booth by about 2ft. The proposed siding of the booth will match the rest of the east elevation and the door will have a similar appearance to what was previously there but will be taller.

Much of the roof top equipment will be replaced, with the addition of a new exhaust fan, as required by current building code, and the new paint booth equipment. The proposal does not include screening, as the equipment was previously not screened from view. Additionally, staff recommended not screening the equipment utilizing a parapet wall running across the width of the building. The increase in height from the parapet and the location closer to the front of the building would create incompatible massing on the roof.



Existing View From Main Street



Existing View From Main Street

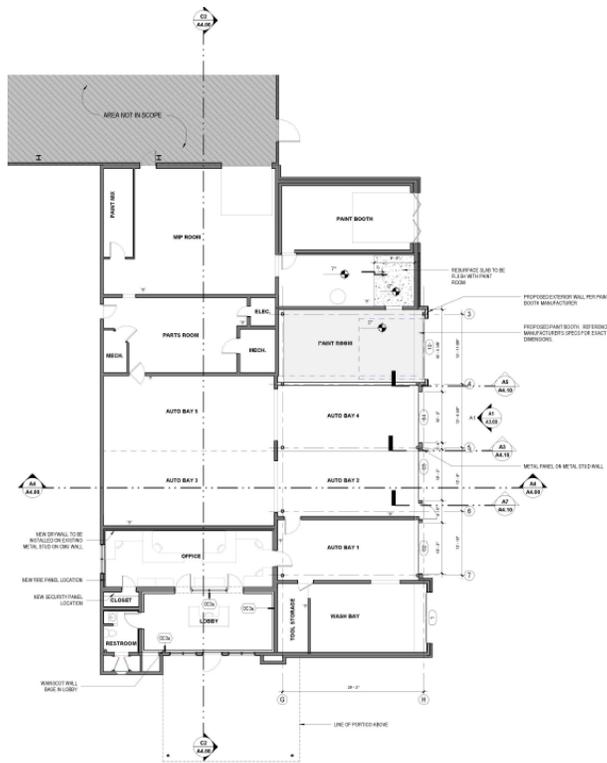


Proposed View From Main Street



Proposed View From Main Street

Figure 4: Views of mechanical existing and proposed mechanical equipment from W Main St, 2659 W. Main St.



Proposed Floor Plan  
1/8" = 1'-0"

Figure 5: Proposed floor plan, 2659 W. Main St.



Figure 6: Proposed south elevation, 2659 W. Main St.

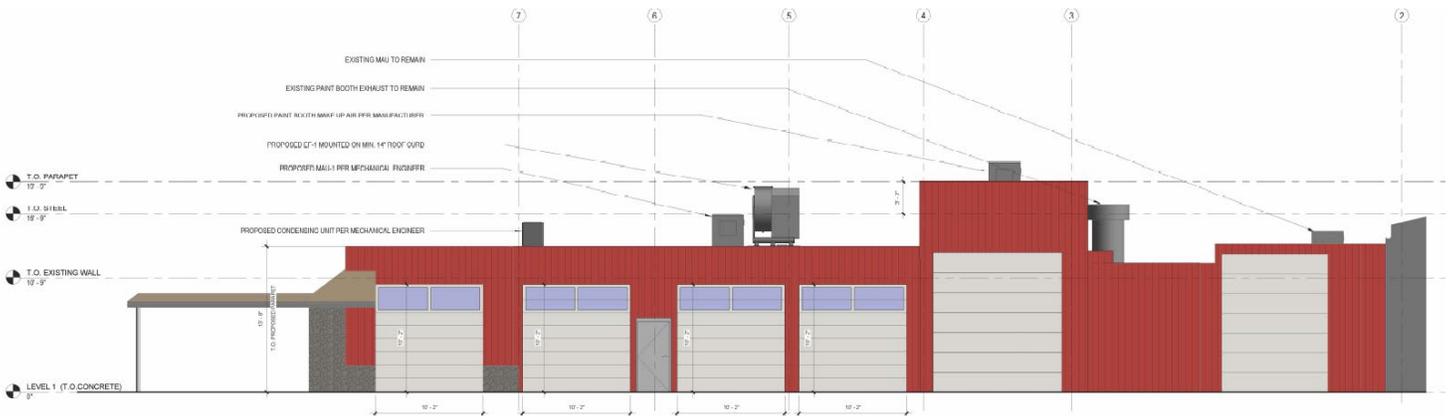


Figure 7: Proposed east elevation, 2659 W. Main St.

**DECISION CRITERIA AND ANALYSIS:**

**Eligibility**

Pursuant to Section 10-8-1.2 of the ULUC, prior to beginning work on a designated historic landmark or property in a Historic District, the property owner shall consult with the Director and submit materials for a certificate of appropriateness. Additionally, per Section 10-9-8.1(A) of the ULUC, the Certificate of Appropriateness “provides for the preservation of historic resources and establishes criteria for the proposed alterations to designated landmarks and buildings in historic districts.” 2659 W. Main Street is a contributing building in the Littleton Downtown Historic District, and as such any proposed work must be approved through a COA process.

**Approval Criteria & Analysis**

10-9-8.1(C). General Decision Criteria. A Certificate of Appropriateness may be approved,

approved with conditions, or denied based on the following criteria:

1. ***Federal Standards.*** The proposed changes are in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, & Reconstructing Historic Buildings as adopted by the National Park Service:

Secretary of Interior Standards

**Standard #1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**

This building has continuously operated as Bradford Auto Body since 1959 and will continue to do so. This standard appears to be met.

**Standard #2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**

The work under review with this COA, is the result of a roof collapse that also affected the east exterior wall. Due to life-safety concerns, the affected portions of the building have already been removed. No further removal of historic materials is proposed under this application. This standard appears to be met.

**Standard #3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.**

None of the proposed changes create a false sense of historic development or include conjectural elements or architectural elements from other buildings. The proposed new siding will be contemporary, but match in color to what was originally on the building. The siding will match what is on building 2 and areas that have already been replaced on the original building. This standard appears to be met.

**Standard #4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**

The proposed addition will not change any features that gained significance. This standard appears to be met.

**Standard #5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.**

The removal of material occurred due to the roof collapse and life safety concerns. This application does not call for the further removal of any features. The proposed siding does not match what was previously on the building, as it is no longer manufactured, but it will match in color to the existing and in profile to other non-historic, siding on the building. This standard appears to be met.

**Standard #6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive features, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**

The roof collapse and resulting demolition removed the exterior siding and garage doors previously on the building. The siding could not be replaced in-kind as it is no longer manufactured. The applicant is proposing to replace it with siding that matches the profile of added and previously replaced siding and will be the same color as the original building. The garage doors were noted as being replaced in kind, but the drawings are not consistent in their depiction of the windows in the garage doors. As shown on the elevations and specification sheet, this standard does not appear to be met.

**Standard #7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials.**

The applicant is aware that no harsh treatments, such as sandblasting or corrosive chemicals may be used. The options before HPC in this application for a COA do not anticipate inclusion of any harsh treatments. This standard appears to be met.

**Standard #8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measure shall be undertaken.**

There are no known archaeological resources on the property. No excavation is expected with these alterations. This standard appears to be met.

**Standard #9. New additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**

The demolition of the roof and wall resulted in the removal of the historic metal siding, but the proposed changes do not further remove any historic materials. The proposed booth addition is set back from the front façade about 43ft to ensure it is still subordinate to the front in location. The height of the booth will be visible from

the front. The increase in height of the booth is primarily dictated by updated EPA regulations. The applicant noted custom booth options exist, but are financially not feasible and would still likely result in an increase roof height. The increase in height from a custom booth, however, would be less than what is proposed under this application. The repair work to the building and the paint booth does include the installation of roof top equipment. Much of this equipment existed prior to the collapse and was previously unscreened and unpainted. A new exhaust fan for the auto bays and unit on the paint booth are additions, required by building code and EPA regulations, respectively. Due to the mid-century style of the single-story building and focus on horizontality, staff recommended leaving the equipment unscreened. Screening the equipment with large parapet walls would greatly impact the overall mass, scale, and form of the building and would not appear compatible. This standard appears to be met.

**Standard #10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

The proposed paint booth is setback from the front façade to maintain the historic integrity of the front façade, which currently maintains the greatest amount of integrity. The pre-fabricated nature of the booth allows it to be easily removed from the building in the future without further affecting the historic integrity or significance of the building. This standard appears to be met.

2. ***Littleton Design Standards and Guidelines.*** The proposed changes are in compliance with the adopted design standards and guidelines documents, such as the **Downtown Littleton Historic Preservation Design Guidelines**, as outlined in the **Design Requirements** section on the city's **Envision Littleton** webpage:

**Downtown Littleton Historic Preservation Design Guidelines**

As a part of the Littleton Downtown Historic District, this application is subject to the *Downtown Littleton Historic Preservation Design Guidelines*. These guidelines establish solutions and standards for the restoration, preservation, and treatment of historical buildings. The specific guidelines are separated into six categories: commercial facades and storefronts; windows; doors; roofs; building materials; cornices, moldings, and other architectural features. The Design Guidelines also establish solutions for additions to historic buildings, including commercial and residential properties and historic site features. Relevant guidelines to this proposal are outlined and evaluated below:

***1) Solutions for Additions to Historic Buildings***

- 3.52 Minimize the loss of historically significant features when planning an addition.
- (i) *The existing siding and garage doors were removed due to the roof collapse and life safety concerns. The current proposal will not result in the further loss of historically significant features.*

- 3.53 An addition should be compatible with the main building.
- (ii) *The proposed expansion of the building was primarily driven by compliance with current EPA regulations for automobile paint booths. The regulations require a larger paint booth, which the applicant is proposing to meet through the installation of pre-fabricated unit. The unit is setback significantly from the front of the building to lessen the impact of the increased height, and the shift in the wall will not extend out further than the front façade.*
- 3.54 Minimize the visual impacts of skylights and other rooftop devices.
- (iii) *The proposal includes the reinstallation of previously existing equipment and the installation of a new exhaust fan, required by building code, and a unit on the paint booth, required by EPA regulations. Staff recommended not screening the equipment, as the screening would have negatively impacted the historic integrity of the building by being incompatible in scale, massing, and form. The equipment could be painted to reduce some of the visual impact it may have on West Main Street.*

#### **Window Replacement Design Guidelines**

No historic windows will be replaced or affected by this proposal. As such, staff finds that the application is consistent with the intent of these guidelines as the proposed improvements will not alter, remove, or replace any historic windows that may exist.

3. ***Original Features.*** The proposed work preserves, rehabilitates, or reconstructs the original architectural features, and proposed new features are visually compatible with designated historic structure(s) located on the property in terms of design, finishes, material, scale, mass, and height.

Staff finds that the proposed work is predominantly compatible with the historic building. The proposed siding will be the same color as the existing siding and will be the same profile as other replacement siding on the original building and what was utilized on a previous addition. The plans do not consistently show the use of in-kind garage doors, but their use is included in notes on the plans and material specification sheets. The proposed booth and mechanical equipment are required by the EPA and current building codes. The required increase in size for the paint booth will only affect that portion of the building and is setback greatly from the front of the building. The reinstalled and new roof top equipment are not screened, as the screening would negatively impact the historic integrity of the building. As the plan set currently exists, the proposed garage doors do not meet this criterion. This criterion has not been met, but can be met by staff's recommended condition as referenced below.

4. ***Compatibility.*** If the property is in a designated historic district, the proposed work is visually compatible with the development on abutting properties and those on the same block. The HPC shall consider characteristics such as setbacks and building scale. Staff finds that the proposed work is compatible with the surrounding historic district.

The proposed paint booth is setback from the front of the building and will remain shorter than surrounding buildings and others in the historic district. The roof top equipment will be visible from West Main Street, but much of it will match what was previously existing. This criterion appears to be met.

- 5. *Character, Interest, and Value.* Aside from changes that do not require a Certificate of Appropriateness, as set out in paragraph B.3.a, above, the proposed work does not adversely affect the special character or historical, architectural, or aesthetic interest or value of a landmark or property in a historic district.**

Staff finds that the proposed work does not adversely affect the special character, interest, or value within the regulations the repair work is required to meet. The proposed booth and roof top equipment may be removed in the future without affecting the historic integrity of the building. This criterion appears to be met.

- 6. *Color and Materials.* The architectural style, arrangement, textures, paint colors especially if applied to brick or stone, and arrangement of colors and materials used on existing and proposed structures are compatible with the character of the existing landmark or property in a historic district; and**

Staff finds that the exterior colors and materials, and their arrangement, are compatible with the character of the existing building. The siding will not be replaced in-kind as it is no longer manufactured but will use siding that exists on building 2 (existing rear addition). This criterion appears to be met.

- 7. *Exterior Features.* The proposed work preserves, enhances, or restores, and does not damage or destroy the exterior architectural features of a historical landmark or property in a historic district.**

This application does not include the further removal of historic material. The roof collapse resulted in the demolition of the exterior wall, which removed the historic siding. This siding cannot be replaced with an in-kind material as it is no longer manufactured. This criterion appears to be met.

#### **HISTORICAL PRESERVATION COMMISSION OPTIONS:**

Pursuant to Section 10-9-8.1.E, the HPC shall approve, approve with conditions, or deny the certificate of appropriateness. The commission may also issue an order to continue the application process if the commission determines that additional information is necessary to make a decision.

#### **STAFF RECOMMENDATION:**

Staff finds that the Certificate of Appropriateness for 2659 West Main St. does not meet all the approval criteria in the ULUC Section 10-9-8.1. Planning staff recommends approval with conditions to ensure all criteria can be met. The approval with conditions are outlined in HPC

Resolution 01-2025. Staff recommends the conditions below:

1. The existing elevations need to accurately depict the removed garage doors, and visually show that the proposed doors are in-kind replacements on the proposed elevations and material specifications sheet.
2. Paint the mechanical equipment a color that will further reduce their appearance.