



Supplemental Staff Report

TO BE VIEW WITH PREVIOUS STAFF REPORT JULY 8, 2026

Hearing Date:	July 8, 2026
Case #:	HCOA-2026-00015 Appeal of HCOA-2026-00013
Project #:	PR-2026-000074
Appellant:	Historic Old Town Association (HOTA)
Applicant:	George Cook
Agent:	RBA Architects
Application:	Appeal of Historic Certificate of Appropriateness – Minor
IDO Section:	IDO § 14-16-6-4(U)(3)(B) IDO § 14-16-6-4(U)(4)
Legal Description:	Tract A Plat of Lands of Casa De Armijo (La Placita Patio Markets) and Plaza Hacienda, MRGCD Map 38
Address/Location:	206 San Felipe St. NW
Property Area:	Approximately 0.81 Acres
Existing Zoning:	MX-T
Staff Planner:	Leslie Naji

CASE SUMMARY: On March 30, 2026, an application for a Certificate of Appropriateness – Minor was submitted after the subject property was altered. The request was to approve the replacement of two banks of windows with doors.

Staff approved the request, which was then appealed by the Historic Old Town Association.

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For ATTACHMENTS: View staff report for July 8, 2026

I. Introduction

Request

This application is an appeal of a staff approval of a Historic Certificate of Appropriateness – Minor to replace windows with doors in the Armijo House, La Placita (“the subject site”), located at 206 San Felipe NW.

In October 2025, new owners of the subject property removed banks of windows and replaced them with doorways. This work was done without a Certificate of Appropriateness, although both the owner and the agent knew that an approval was required. In March 2026, following a Notice of Violation by Code Enforcement, the applicant submitted an application for the Certificate of Appropriateness.

The applicant submitted evidence that the doors were installed in locations that used to have doors prior to having windows. Staff approved the Certificate on April 1, 2026[Case # HCOA-2026-00013]. Replacing the windows with doors precluded the use of previously designated vendor spaces. The City’s Arts and Culture Department changed the arrangement of vendor spaces in coordination with the Old Town Portal Market Advisory Board to keep the doors clear for ingress/egress and move 6 of the 15 spaces to the south façade.

If the appeal is granted, the doors installed on the west façade facing Old Town Plaza would need to be removed and replaced with windows to restore the building’s pre-door installation architectural character.

Site Context

<i>Characteristic</i>	<i>Subject Site</i>	<i>Site to the West</i>	<i>Site to the North</i>	<i>Site to the East</i>	<i>Site to the South</i>
<i># of Stories</i>	1.5	2	1	1	1
<i>Roof Configuration</i>	Front gable	-	Flat roof	Flat roof	Flat roof
<i>Architectural Style</i>	NM Vernacular	Old Town Plaza	Pueblo Revival	Pueblo Revival	Spanish Revival
<i>Age of Construction (approx.)</i>	1882	1706	1957	1898	1890
<i>Historic Classification</i>	Contributing	Contributing	Contributing	Contributing	Contributing
<i>Land Use</i>	Commercial	Park	Commercial	Commercial	Commercial

This building, parts of which are said to date back to 1706, is a contributing building in the New Mexico Vernacular architectural style. The building features a pitched single ridge roof with a front gable roof. The exterior is finished with stucco.

Site History

The Armijo House is one of the earliest houses built in Old Town. The southern portion, with the gabled roof, constituted the original house. The northern flat roof portion was a commercial addition, with an original office space bridging the two.

Over the years, the property has undergone multiple changes. The uses of the spaces have changed from residential and shops to a theater and later restaurants. The number of openings has changed over the years, as well. The original buildings had one entrance to each space, the residence to the south, the office directly north of the residence, and one entrance into each of the two shop spaces at the northern end.

The configuration of windows and doors prior to the latest change was in place for over 50 years and has historic character of its own. Both windows and doors have historic integrity as the opening sizes have not changed.

Landmark Commission's Role

The Landmark Commission is the appeal body for a Historic Certificate of Appropriateness – Minor [IDO Table 6-1-1; IDO § 14-16-6-5(B); IDO § 14-16-6-4(U)(1)(a)]. The procedure for the appeal are established in IDO § 6-4(U)(3)(b). The criteria for a decision on an appeal are established in IDO § 14-16-6-4(U)(4).

II. APPLICABLE PLANS, ORDINANCES, DESIGN GUIDELINES & POLICIES ANALYSIS

Old Town Solicitations Ordinance

As confirmed in the survey provided by the applicant, the portal is public right-of-way owned by the City.

The City regulates outdoor retail sales and related display of “handcrafted items” on specified portions of the public sidewalk through the Old Town Solicitations Ordinance [ROA 1994 § 13-3-2]. The purpose of this ordinance is “to preserve, protect and promote the educational, cultural and artistic interests of the Old Town HPO 5 and the general public, control congestion, and protect the health and welfare of the citizens of the city.” The Ordinance establishes that 15 permits may be granted to vendors, hours of solicitation, prohibited activities, and the size and general location of the vendor spaces on the Old Town Portal Market [13-3-2-12].

(A) Vendors shall be allowed to solicit within the Old Town HPO-5 only on the porch, on the sidewalk along the east side of San Felipe Street, NW, from the line perpendicular to San Felipe Street taken from the midpoint of South Plaza Street, NW, to 16 feet south of the north end of the porch. This area shall be divided into 15 equal spaces, which shall be generally five feet in width and six feet in depth measured from the building wall. The spaces shall have provision for access and shall be divided in such a way to ensure movement and safety. The

Old Town Portal Manager shall administratively determine and delineate the exact location of the spaces to insure that soliciting does not obstruct the view from the two large windows of the La Placita Restaurant and to insure movement and safety between the vendors. All spaces will be numbered from 1 through 15 beginning at the south end of the designated area.

The City's Arts and Culture Department is the designated Old Town Portal Manager and convenes and coordinates with the Old Town Portal Market Advisory Board. A change to the stall distribution enacted on April 15, 2026 reduced the number of stalls along San Felipe to 9. A recent submittal provided by the Agent for the property owner (See Attachment C) demonstrates how a layout could still accommodate 15 vendors under the original portal. The property owner, George Cook, has tentatively agreed to this layout.

Integrated Development Ordinance (IDO)

In May 2018, the Integrated Development Ordinance (IDO) replaced the City's Zoning Code, and the property's zoning converted from H-1 to MX-T.

Old Town Historic Protection Overlay Zone (HPO-6)

The property is located within the Old Town Historic Protection Overlay zone (HPO-6). The IDO establishes regulatory controls for HPO zones. IDO § 14-16-3-5(L) identifies standards for Old Town HPO-6 related to building height, parking, signs, and outdoor display and demonstrations.

Procedures and Decision Criteria for Historic Certificate of Appropriateness – Minor

The IDO establish procedures for reviewing and deciding applications in Table 6-1-1 and Specific Procedures [IDO § 14-16-6-5]. Table 6-1-1 establishes that Planning staff reviews and decides Historic Certificates of Appropriateness – Minor, which can be appealed to the Landmarks Commission.

Staff reviewed and decided the Historic Certificate of Appropriateness – Minor under the following IDO criteria. (See Attachment D for Staff Report with analysis of the decision criteria.)

6-5(B)(3) Review and Decision Criteria [Historic Certificate of Appropriateness – Minor]

An application for a Historic Certificate of Appropriateness – Minor shall be approved if it complies with all of the following criteria.

6-5(B)(3)(a) The change is consistent with the designation ordinance and specific development guidelines for the City landmark or HPO zone.

- 6-5(B)(3)(b) The architectural character, historical value, or archaeological value of the structure or site itself or of any HPO zone in which it is located will not be significantly impaired or diminished.
- 6-5(B)(3)(c) The change qualifies as a "certified rehabilitation" pursuant to the Tax Reform Act of 1976, if applicable.
- 6-5(B)(3)(d) The structure or site's distinguished original qualities or character will not be altered, where "original" means both those included at the time of initial construction and those developed over the history of the structure.
- 6-5(B)(3)(e) Deteriorated architectural features shall be repaired rather than replaced, to the maximum extent practicable. If replacement is necessary, the new material shall match the original as closely as possible in like material and design.

Historic Old Town Development Standards and Guidelines

The Landmarks Commission adopted Development Standards and Guidelines (last amended in December 2022) for building projects in the Old Town Historic Protection Overlay Zone (HPO-6). The guidelines include building height, massing, proportion and scale, the use of materials in new and existing buildings, the relationship between buildings, landscaping, roadways, sidewalks, and the overall neighborhood character.

POLICY – Windows and Doors

Whenever possible, historic windows should be repaired rather than replaced.

GUIDELINES

1. Retain and preserve the position, number, size and arrangement of historic windows and doors.
 - It is not appropriate to enclose, cover or fill in a historic window or door opening.
 - If additional openings are necessary for a new use, install them on a rear or non-character defining façade of the building.
 - New window and door openings on front facades shall be permitted only in locations where there is evidence that original openings have been filled with other material.
 - New openings must never compromise the architectural integrity of the building.
 - The design of new window units shall be compatible with the overall character of the building, but should be distinguished as a later feature.
2. Replacement of windows and doors that have been altered and no longer match the historic character of the building is recommended.

- If a window or a door is completely missing, replace it with a new unit based on accurate documentation or a new design to fit the original opening and compatible with the historic and architectural character of the building.
- 3. Retain and preserve functional and decorative features such as transoms and sidelights.

III. Appeal of Historic Certificate of Appropriateness – Minor

Appeal Body

The IDO establishes that staff decisions on a Historic Certificate of Appropriateness – Minor may be appealed to the LC [§ 14-16-6-4(U)(1)(a)].

Landmarks Commission Procedure

The procedure for this appeal is established in IDO § 14-16-6-4(U)(3)(b).

1. Once an appeal has been accepted by the Planning Director, the City Planning Department staff (Historic Preservation planner) shall prepare and transmit a record of the appeal together with all appeal material received from the appellant the property owner and appellant(s) and to the LC. The LC shall schedule a hearing on the matter within 45 calendar days of receipt. The Historic Preservation Planner shall notify the parties. Appellants and parties to the appeal may submit written arguments to the LC so long as the written argument is received by LC staff at least 10 calendar days prior to the hearing.
2. The LC may accept new evidence into the record if it appears that such additional evidence is necessary for the proper disposition of the matter and could not have been placed into the record during the previous decision-making process. New evidence that clarifies evidence already in the record, that is offered to contradict evidence in the record, or that is offered on a key factual issue, may be allowed or may justify remand.
3. The LC may impose reasonable limitations on the number of witnesses heard and, on the nature, and length of their testimony and cross-examination.
4. The LC shall make findings exclusively on the record of the decision appealed, supplemented by any evidence allowed at the hearing.
5. The LC may affirm, reverse, or otherwise modify the lower decision to bring it into compliance with the standards and criteria of this IDO, applicable City regulations, and any prior approvals related to the subject property.
6. If the LC determines that the matter should be remanded, the LC shall set forth the reason(s) for the remand and the matters to be reconsidered and may order such remand. The matter must be heard and decided by the original decision-making body prior to any further appeal of the matter.

Criteria for Decision on an Appeal

The decision criteria for an appeal is established in IDO § 14-16-6-4(U)(4).

6-4(U)(4)(a) The criteria for review of an appeal shall be whether the decision-making body or the prior appeal body made 1 of the following mistakes.

1. The decision-making body or the prior appeal body acted fraudulently, arbitrarily, or capriciously.
2. The decision being appealed is not supported by substantial evidence.
3. The decision-making body or the prior appeal body erred in applying the requirements of this IDO (or a plan, policy, or regulation referenced in the review and decision-making criteria for the type of decision being appealed).

6-4(U)(4)(b) An additional criterion for review of an appeal shall be if the applicant failed to comply with mailed notice requirements for property owners pursuant to § 14-16-6-4(J)(3)(c). Failure to comply with email notice requirements for a Neighborhood Association pursuant to § 14-16-6-4(J)(2) is not sufficient grounds to uphold an appeal.

The appellant's letter of justification for the appeal is quoted in bullet points, and staff's response follows in *italics*.

The appellant's letter of justification for the appeals focuses on faulty notice to the Neighborhood Association, in this case the Historic Old Town Association.

- The notice provided to neighborhood associations was confusing on its face. It stated that the application was for "a new 2-story 4-unit apartment building," while the same notice later described the project as "an existing restaurant's pair of doors and windows replaced with new doors/windows matching existing decor style." Those are materially different descriptions. A neighborhood association cannot meaningfully evaluate or respond to a project when the notice itself does not clearly identify what is being proposed.
- A procedurally defective application should not be cured by after-the-fact approval. The appropriate remedy is to require the applicant to resubmit a complete and accurate application, provide clear notice, disclose the full scope and timing of the work, explain the historic preservation implications, and allow affected parties a fair opportunity to request a facilitated meeting and participate in review before any approval is granted.

Although notice from the applicant was flawed, the required notice was sent, which gave the Neighborhood Associations time to respond to LC staff. It was clear that the nature of the request was known, since the NA had notified staff of the window replacements

when the doors were first installed. Before the application was approved, staff sent the required notification to all neighborhood associations with details of the action.

Failure to comply with email notice requirements for a Neighborhood Association is not sufficient ground to uphold an appeal; nonetheless, the subsequent appeal hearings have allowed affected parties a fair opportunity to participate in review.

In addition, the appellant contends that Planning staff erred in the original decision (Appeal Criterion 3).

- Converting windows to doors on the historic portal changes the building's relationship to one of Old Town's most visible and historically important public-facing spaces. It may also affect the long-standing Portal Vendors Program, whose presence under the portal is historic, traditional, and economically important to Old Town.

In the evaluation, staff looked at the earlier photos showing doors in the locations of the new installations. Pursuant to Historic Old Town Development Standards and Guidelines for Doors and Windows #2, "Replacement of windows and doors that have been altered and no longer match the historic character of the building is recommended."

Staff determined the reintroduction of doors was appropriate to restore the historic character of the building.

While the configuration of doors and windows affects the placement of vendor spaces, the Landmarks Commission does not have jurisdiction over the Old Town Solicitations Ordinance. The Arts and Culture Department has adjusted the placement of the spaces to ensure 15 vendor spaces all of the same sized to comply with the Ordinance and retain the Old Town Portal Market as an historic activity within Old Town.

IV. Agency & Neighborhood Concerns

Reviewing Agencies

The State Historic Preservation Office (SHPO) staff that reviews tax credits has been asked for comment concerning this application. Although this application is no longer eligible for tax credits, it probably would not have been eligible with this change to long standing architectural feature; however, this is not definitive.

Planning staff met with Arts and Culture staff about the Old Town Portal Market on June 22, 2026, and Arts and Culture provided comments and materials on June 24, 2026.

Neighborhood/Public

The Historic Certificate of Appropriateness – Minor does not require mailed notice to property owners within 100 feet. Neighborhood Associations (NAs) within 660 feet were notified, as required. The applicant notified the Downtown NA, the Sawmill NA, the

West Old Town NA, the West Park NA, and the Historic Old Town Association at the time of the application.

The Historic Old Town Association, which was notified of the original application, is the appellant in this case.

Vendors who lease spaces on the Portal Market have expressed concerns over the impact the added doors have on the distribution of vendor spaces along the market. The doors require six (6) spaces to move to the southern façade to ensure appropriate ingress/egress. This reduces the spaces on the west façade from 15 to 9.

V. Conclusion

The appeal is to a staff decision of approval for a Historic Certificate of Appropriateness – Minor to replace windows with doors along the west façade of 206 San Felipe, a.k.a. La Placita. The staff decision was made solely on the impact of the new doors on the architectural character of the building. The openings in question had, at an earlier time, been doors, which staff determined was grounds for approval of the application.

The appeal has drawn attention to the cultural contribution of the Old Town Portal Market vendors. The decision criteria for the Historic Certificate of Appropriateness – Minor does not involve consideration of any other Ordinance, so the Old Town Solicitations Ordinance was not a factor in the original decision.

The Landmarks Commission shall determine whether Historic Preservation staff made an error in approving the Historic Certificate of Appropriateness – Minor to replace windows and install the doors. If the Landmarks Commission finds that staff erred, the appeal shall be granted, and the the original approval will be overturned. If the Landmarks Commission finds that staff did not err, then the appeal shall be denied, affirming the original approval.

Findings, Appeal of Certificate of Appropriateness – Minor

Project #: PR-2026-000074 / Case#: HCOA-2026-00015 (Appeal of HCOA-2026-00013)

1. This is an appeal to a Historic Certificate of Appropriateness – Minor that was requested after alterations were made to Tract A Plat of Lands of Casa De Armijo (La Placita Patio Markets) And Plaza Hacienda MRGCD Map 38, located at 206 San Felipe St NW and containing approximately 0.81 acres.
2. The applicant removed two banks of windows facing the Old Town Portal Market and replaced them with doors within the same opening without requesting the required Historic Certificate of Appropriateness.
3. The subject site is within the Old Town Historic Protection Overlay Zone (HPO-6) and subject to the Historic Old Town Development Standards & Guidelines, last amended in December 2022.
4. The Appellants filed a timely appeal under the IDO.
5. As a Neighborhood Association within 660 feet of the subject property, the Appellants have standing to appeal the April 1, 2026, decision of Historic Preservation staff on the basis of proximity pursuant to IDO § 14-16-6-4(U)(2)(a)5 and Table 6-4-2.
6. The Integrated Development Ordinance (IDO) [§ 14-16], and the Historic Old Town Development Standards & Guidelines are incorporated herein by reference and made part of the record for all purposes.
7. Pursuant to IDO § 14-16-6-6(D)(3) (Review and Decision Criteria), "An application for a Historic Certificate of Appropriateness – Minor shall be approved if it meets all of the following criteria."
 - a) The change is consistent with the designation ordinance and specific development guidelines for the City landmark or HPO zone.

The change is consistent with the specific development guidelines for doors and windows as discussed below. The change creates some difficulties with the Old Town Portal Market by reducing the number of vendor spaces along the west façade of the building; however, moving spaces to the south façade allows 15 vendor spaces in total to meet the minimum required by the Old Town Solicitations Ordinance. Additional access to areas within the Armijo Building can create new economic opportunities.

- b) The architectural character, historical value, or archaeological value of the structure or site itself or of any HPO zone in which it is located will not be significantly impaired or diminished.

The change will not impair or diminish the architectural character, historical value, or archaeological value of the building, since the original building had

doors in the locations in question. Visually, whether they be doors or windows, the look of the openings remains essentially the same. Old Town Historic District will not be adversely affected by the change.

- c) The change qualifies as a "certified rehabilitation" pursuant to the Tax Reform Act of 1976, if applicable.

Considering the length of time the windows have been in place, the project might not meet the Secretary of Interior (SOI) standards for tax credits; however, no tax credits are being sought and both configurations could be defensible.

- d) The structure or site's distinguished original qualities or character will not be altered. For the purposes of § 14-16-3-5 (Historic Protection Overlay Zones) and this § 14-16-6-6(D), "original" shall mean as it was at the time of initial construction or as it has developed over the course of the history of the structure.

The Armijo Building, nearly 150 years old, has undergone multiple changes and reconfigurations. Prior to the most recent change, the window configuration had been in the building for over 50 years; before that, several of the windows had been doors. Both configurations provided similar dimensions of openings and ratio of solid to glazing. The reinstallation of doors does not alter the character of the building.

- e) Deteriorated architectural features shall be repaired rather than replaced, if possible. If replacement is necessary, the new material shall match the original as closely as possible in material and design.

The materials being replaced are not original; nor are the materials they are being replaced with. The material and design of the doors fail to maintain the integrity of the building's architecture, as they are very flat compared to original doors still in place.

8. The application complies with the Historic Old Town Development Standards and Guidelines, as amended by the Landmarks Commission in December 2022.

1. Retain and preserve the position, number, size and arrangement of historic windows and doors.

The new door units utilize existing openings to replicate what may have originally been in the location. The position, size, and location of the replacement doors are similar to earlier doors; however, the character of the doors and the amount of glazing compared to the original windows, and even earlier doors, is not sufficient. Should the openings remain doors, a door more in keeping with earlier doors should be used.

2. Replacement of windows and doors that have been altered and no longer match the historic character of the building is recommended.
 - If a window or a door is completely missing, replace it with a new unit based on accurate documentation or a new design to fit the original opening and compatible with the historic and architectural character of the building.

The change is a reversible intervention that removes window replacements that were not original. Replacement with doors more in keeping with earlier doors is recommended.

3. Retain and preserve functional and decorative features such as transoms and sidelights.

Sidelights are introduced on one of the doors that does not reflect the nature of earlier sidelights. Replacement with doors more in keeping with earlier doors is recommended.

7. The criteria for a decision on an appeal shall be whether the decision-making body or the prior appeal body made one of the following mistakes [IDO § 14-16-6-4(U)(4)(a)].
 1. The decision-making body or the prior appeal body acted fraudulently, arbitrarily, or capriciously.
 2. The decision being appealed is not supported by substantial evidence.
 3. The decision-making body or the prior appeal body erred in applying the requirements of this IDO (or a plan, policy, or regulation referenced in the review and decision-making criteria for the type of decision being appealed).
8. While the email notice to Neighborhood Associations contained errors, the notice was sent by the applicant as required and corrected by Planning staff prior to decision on the Historic Certificate of Appropriateness – Minor. Failure to comply with email notice requirements for a Neighborhood Association pursuant to § 14-16-6-4(J)(2) is not sufficient grounds to uphold an appeal or remand a decision for further consideration.
9. The Landmarks Commission does not agree with the appellant's claims that staff erred in the decision for approval, pursuant to IDO § 14-16-6-4(U)(4)(a)3, by looking at the original placement of doors rather than the window configuration over the last 50 years, which established the character of the building.

Recommendation

That the APPEAL Project #: PR-2026-000074 / HCOA-2026-00015, be DENIED, affirming staff's decision, and APPROVING HCOA-2026-00013 for Alterations to Tract A Plat of Lands of Casa De Armijo (La Placita Patio Markets) And Plaza Hacienda MRGCD Map 38 located at 206 San Felipe St NW, based on Findings #1-9.

Recommended Conditions of Approval – Historic Certificate of Appropriateness – Minor

Project #: PR-2026-000074 / Case #: HCOA-2026-00013

1. Removal of new doors and replacement with high relief doors more in keeping with original doors at the site.
2. Submittal of new doors to Historic Preservation staff to coordinate the design and materials of the replacement doors.

A) PHOTOS



B) APPEAL APPLICATION

C) STAFF INFORMATION

D) HISTORIC CERTIFICATE OF APPROPRIATENESS – MINOR
APPLICATION [HCOA-2026-00013]

E) REVIEW AND DECISION CRITERIA [HCOA-2026-00013]

6-5(B)(3) Review and Decision Criteria [Historic Certificate of Appropriateness –Minor]
An application for a Historic Certificate of Appropriateness – Minor shall be approved if it complies with all of the following criteria.

6-5(B)(3)(a) The change is consistent with the designation ordinance and specific development guidelines for the City landmark or HPO zone.

Analysis: Pursuant to IDO §14-16-3-5(A), the purpose of the Historic Preservation Overlay (HPO) zone is to preserve, protect, enhance, perpetuate, and promote the use of structures and areas of historical, cultural, architectural, engineering, archeological, or geographic significance located in the city; to strengthen the city's economic base by stimulating the tourist industry; to enhance the identity of the city by protecting the city's heritage and prohibiting the unnecessary destruction or defacement of its cultural assets; and to conserve existing urban developments as viable economic and social entities.

The staff decision was based solely on the character of the building.

6-5(B)(3)(b) The architectural character, historical value, or archaeological value of the structure or site itself or of any HPO zone in which it is located will not be significantly impaired or diminished.

Analysis: The architectural character of the building will not be significantly altered. The openings had originally been doors, although the openings have been windows without access for more than 50 years and as such, have their own historic character and significance.

6-5(B)(3)(c) The change qualifies as a "certified rehabilitation" pursuant to the Tax Reform Act of 1976, if applicable.

Analysis: Considering the length of time the windows have been in place, 9

6-5(B)(3)(d) The structure or site's distinguished original qualities or character will not be altered, where "original" means both those included at the time of initial construction and those developed over the history of the structure.

Analysis: The openings into the building from the portal have undergone multiple changes over the years. As noted above, the openings had originally been doors. The configuration of three (3) doors and five (5) windows has been in place for 50-70 years. The

replacement of two windows with doors is an alteration to the building's original character and especially the character of the Portal Market.

6-5(B)(3)(e) Deteriorated architectural features shall be repaired rather than replaced, to the maximum extent practicable. If replacement is necessary, the new material shall match the original as closely as possible in like material and design.

Analysis: The change is not meant to be a repair, and the windows in place had not been in a deteriorated state.

Historic Old Town Development Standards and Guidelines
Landmarks Commission adopted Development Standards and Guidelines (last amended in December 2022) for building projects in the Old Town Historic Protection Overlay Zone (HPO-6). The guidelines include building height, massing, proportion and scale, the use of materials in new and existing buildings, the relationship between buildings, landscaping, roadways, sidewalks, and the overall neighborhood character.

POLICY – Windows and Doors Guidelines

Whenever possible, historic windows should be repaired rather than replaced.

GUIDELINES

1. Retain and preserve the position, number, size and arrangement of historic windows and doors.

- It is not appropriate to enclose, cover or fill in a historic window or door opening.
- If additional openings are necessary for a new use, install them on a rear or non-character defining façade of the building.
- New window and door openings on front facades shall be permitted only in locations where there is evidence that original openings have been filled with other material.
- New openings must never compromise the architectural integrity of the building.
- The design of new window units shall be compatible with the overall character of the building, but should be distinguished as a later feature.

Analysis: The new door units utilize existing openings to replicate what may have originally been in the location. The position, size, and location of the replacement doors are similar to earlier doors; however, the character of the doors and the amount of glazing compared to the original windows, and even earlier doors, is not sufficient. Should the doors remain, a door more in keeping with earlier doors should be used.

The new doors do not compromise the architectural integrity of the building. No new openings are requested.

2. Replacement of windows and doors that have been altered and no longer match the historic character of the building is recommended.

- If a window or a door is completely missing, replace it with a new unit based on accurate documentation or a new design to fit the original opening and compatible with the historic and architectural character of the building.

Analysis: The proposed works represent a reversible intervention that removes window replacements that would be considered original due to their long-standing placement and their contribution to the use of the Portal Market.

3. Retain and preserve functional and decorative features such as transoms and sidelights.

Analysis: Sidelights are introduced on one of the doors but do not reflect the nature of earlier sidelights.

F) NOTICE OF DECISION [HCOA-2026-00013]

G) OLD TOWN PORTAL MARKET ADVISORY BOARD MINUTES