



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240



April 23, 2024

[REDACTED]

**PROPERTY: Peoples Methodist Episcopal Church, 527 East Saint Vrain Street, Colorado Springs, CO**

**PROJECT NUMBER: 46645, Part 2**

**APPEAL NUMBER: 1682**

**ACTION: Final Administrative Decision**

Dear [REDACTED]

I have concluded my review of your appeal of the September 21, 2023 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the Part 2 – Description of Rehabilitation application for the property cited above (the Decision). The appeal was initiated and conducted in accordance with Department of the Interior regulations [36 C.F.R. part 67] governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you for meeting with me via videoconference on January 10, 2024, and for providing a detailed account of the project including a live video walk-through of the project.

After careful review of the complete record for this project, including the materials presented as part of your appeal, and subsequently submitted at my request, I have determined that the rehabilitation of Peoples Methodist Episcopal Church is not consistent with the historic character of the property and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards). I hereby affirm the denial of certification of the Part 2 – Description of Rehabilitation application issued in the TPS Decision of September 21, 2023.

The People's Methodist Episcopal Church, located on the southeast corner of Saint Vrain Street and Farris Court, is a Queen Anne style, one-story, wood-framed, cross gabled church with its

main entrance at the base of the bell tower at its northwest corner. Constructed in 1904 and altered in the early 1930s, photographs taken in the 1940s show the building substantially as it appeared prior to the rehabilitation work. The property was individually listed on the National Register of Historic Places in July 2014 with a 1904-1965 period of significance.

The exterior massing is Queen Anne style, but with some Gothic details, notably three large Gothic windows at each gable end that light the sanctuary, the steep pitch of the gable roofs, and the steep pyramidal roof of the bell tower. The exterior walls are finished with a combination of wood clapboard between a belt course at windowsill height to the bottom of the gables and alternating triple courses of half-cove fancy butts and rectangular shingles below the belt course, in the gables, and on the upper part of the bell tower. The south elevation has a door into the office and a low shed below the windowsill of the sanctuary window. The sanctuary windows were large gothic-arched openings with simple tracery emerging from the mullions dividing three double-hung windows. There were also smaller double-hung windows in the west wall of the office and flanking the chancel cove on the east wall.

The interior was primarily one large, T-shaped, vaulted sanctuary space entered through a vestibule in the base of the bell tower. The east wall of the sanctuary had a raised chancel, a shallow apse behind the pulpit with a baptismal font under a removable panel in the chancel floor, and an extension of the chancel along the south wall for the choir. There was a raised sound booth in the southwest corner of the sanctuary and stairs to the basement in the southwest corner. A small office at the southwest corner of the building mirrors the footprint of the entrance vestibule at the northwest corner. The building appeared to have few, if any, changes made outside of the period of significance, although some structural deficiencies as well as general deterioration were apparent in the documentation provided.

The rehabilitation described in the Part 2 application would convert this former church into a single-family residence. TPS determined that the proposed work would change the historic character of the building on both the exterior and interior. On the exterior, new additions and alterations to the building's original fenestration would alter historic features and change the historic appearance of the building. The historic character of the interior would be altered by the insertion of a new floor plate and partitioning walls within the sanctuary space. Consequently, TPS determined that the overall impact of the rehabilitation compromised the historic character of the building and found that the completed work failed to meet Standards 2 and 6. Standard 2 states, "*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.*" Standard 6 states, "*Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, 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.*"

Although this is technically a Part 2 application and appeal, the reality is that this is a completed project. The program for the change in use from a church to a residence caused changes to every façade and space within the building.

Within the sanctuary, the raised chancel was removed, the baptismal font was removed, the shallow, cove-walled apse was demolished and a new squared-off projecting bay with four windows constructed in its place, the windows flanking the apse were removed and the openings closed, the raised sound booth was removed, and the stairs to the basement were removed. A new mezzanine fills the entire floor area of the west end of the cross gable and part of the west side of the north-south gable, with open stairs along its eastern edge. The mezzanine is a structural diaphragm meant to resist the outward forces on the exterior walls caused by the weight of the gable roofs. The mezzanine physically ties together the north and south walls of the cross gable and has three tie rods across the open volume of the sanctuary to stabilize the east wall of the main gable. The space under the mezzanine is partitioned off to create a bedroom, a bathroom, a powder room, a pantry, and a large closet. At the second level, partition walls define a master bedroom, bath, and knee wall spaces under the slope of the roof. A small addition constructed through the north slope of the gable connects to a newly created room in the bell tower and a skylight was added on the south slope to provide emergency egress access to the roof of the office below.

Regarding the entrance in the bell tower, prior to the rehabilitation the original west double doors had been blocked off by a non-historic shed and the double doors in the north wall had been replaced with contemporary double doors. The rehabilitation reopened the intact original west double doors and converted the north double doors into three narrow fixed-light windows. At the second level of the bell tower, two new paired casement windows were cut into the decorative siding on the north and west sides. At the third level, two historic Gothic-arched vents with horizontal louvers were converted into larger Gothic-arched windows matching the width of the new windows installed at the second level. A short section of roof aligns with the pent roof between the second and third levels of bell tower, above the connector between the mezzanine and the new room in the tower.

Regarding the three large Gothic-arched windows, the three double-hung windows in each were all replaced. The north window now has three fixed, single-light windows under a taller header. The west window now has three shorter fixed, single-light windows under a massive header corresponding to the depth of the new mezzanine floor. The south window was cut down to floor level and three full-height doors were installed, one hinged and the other two are bifolds. In contrast to the other two Gothic-arched windows, the header over the doors is similar in height to the historic header. These new doors open onto a new deck along the south façade, where the historic shed had been located. Four other new windows were installed, two horizontal single-light windows in the first-floor bathroom adjacent to the historic entrance doors and in the powder room adjacent to the former office, the historic double-hung window in the office was

replaced with a fixed, single-light sash, and a similar new window was inserted over the kitchen sink on the east wall.

After a careful review of the project file, including the materials presented at the appeal meeting, materials subsequently submitted at my request, and online research I conducted, I agree with some of the denial issues TPS cited in the Decision, but not all. Although the mezzanine floor closes off the floor area and spatial volume of the cross-gable of the sanctuary, I have determined it is a reasonable solution to the severe racking of the exterior walls and minimally complies with the Standards because it leaves open two-thirds of the floor area and spatial volume in the main north-south axis of the sanctuary. Consequently, I disagree with TPS that the mezzanine is a significant denial issue. I have also determined that the chancel platform, underfloor baptismal font, sound booth, and stairs to the basement are not significant character-defining features and that their removal is not a denial issue.

However, I have determined that the shallow apse and flanking windows on the east side of the sanctuary are character-defining features because the cove-walled apse defined the axis and focus of worship and the flanking windows brought eastern light into the sanctuary. In this case, I concur with TPS that the removal of these features, filling in the window openings, and replacing the apse with a squared-off projecting bay with four windows are significant denial issues violating Standards 2 and 6, quoted above.

I also concur with TPS that the cumulative impact of the treatment of the windows, whether replaced or new, are primary denial issues. Specifically, the denial issues are:

- The north Gothic window had mullions between and window heads above the three double-hung windows the same width as the Gothic tracery above them. The rehabilitation replaced the historic windows with fixed, single-light windows with black frames that make the mullions appear narrower than their historic width, and installed a taller and projecting window head, violating Standard 6.
- The west Gothic window had mullions between and window heads above the three double-hung windows the same width as the Gothic tracery above them. The rehabilitation replaced the historic windows with shorter, fixed, single-light windows with black frames that make the mullions appear narrower than their historic width, and installed a significantly taller and projecting window head, significantly changing the configuration of the window and violating Standards 2 and 6. The architectural drawings showed a detail where the mezzanine floor was set back from the window so that the height of the window head would not have been significantly changed, but that detail appears to not have been constructed.
- The south Gothic window had mullions between and window heads above the three double-hung windows the same width as the Gothic tracery above them. The

rehabilitation removed the historic windows and replaced them with three storefront-type doors, one hinged and the other two a bifold configuration, and a taller and projecting window head, significantly changing the configuration of the window. Additionally, in contrast with the historic white framing, the new doors and frames are black, so there is no visual expression of the historic mullions. These changes violate Standards 2 and 6.

- The north entrance doors, although not historic, were replaced with three narrow windows that do not match the missing historic doors even though the remaining west entrance doors were physical evidence of their original appearance. This change violates Standards 6 and 9.
- The bell tower originally had pointed arch vents with horizontal louvers and narrow trim at the third level. The rehabilitation replaced the vents with larger, pointed-arch windows with thin tracery and wider trim like that on the historic office window. At the second level, two new casement windows were inserted in the decorative siding, again with trim like the office window. And both sets of windows are oversize in proportion to the scale of the bell tower. I have determined that these changes violate Standard 2 and to a lesser extent Standard 3 because they create a false sense of history and Standard 9 because they are not compatible with the scale of the bell tower.
- New, horizontal bathroom windows were inserted in the historic clapboard siding of the side walls below the cross-gable roof, also with trim like that on the historic office window. The shape, location, and trim of these windows cause them to be prominent new features incompatible with the historic character of the building, violating Standard 9.

Standard 3 states, *“Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.”* Standard 9 states, *“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.”* Although Standards 3 and 9 were not discussed in the Decision, the regulations state, *“The Chief Appeals Officer may base his decision in whole or part on matters or factors not discussed in the decision appealed from.”* [36 C.F.R. 67.10(c)].

Three new windows were installed on the north façade, two emergency egress windows in window wells at the basement level, and one over the kitchen sink. These new features are well hidden, and I have not considered them in my appeal decision.

As described above, I have determined that there were a series of changes made to the building to accommodate the new use that, cumulatively, significantly alter its appearance and diminish its integrity. Thus, the overall impact of the rehabilitation has significantly compromised the historic character of the Peoples Methodist Episcopal Church, causing the completed work to fail to meet the Secretary of the Interior's Standards for Rehabilitation. Accordingly, I affirm the Part 2 denial of certification issued by TPS in its September 21, 2023 Decision.

In your appeal, you noted the delay in the Colorado SHPO forwarding the Part 2 application to the NPS. However, the timeline for the project demonstrates that the project would have still been well underway even if the SHPO recommendation had been more timely filed. The regulations state, "*Owners are strongly encouraged to submit part 2 of the application prior to undertaking any rehabilitation work. Owners who undertake rehabilitation projects without prior approval from the Secretary do so strictly at their own risk.*" [36 C.F.R. 67.6(a)(1)].

You also expressed a willingness to complete remedial work and suggested changes that could help bring the overall project into conformance with the Standards. That may be possible, but it would require design changes to multiple features that have not been reviewed by TPS, thus are beyond the scope of this appeal. You can submit any proposed changes as an amendment through the normal process. If that amendment should be denied certification, that potential future decision can be newly appealed.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to TPS's September 21, 2023 Decision regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

**JOHN A BURNS**

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Date: 2024.04.23 15:44:56 -04'00'

John A. Burns, FAIA, FAPT  
Chief Appeals Officer  
Cultural Resources

cc: CO SHPO  
IRS