

**STAFF REPORT 11-10-2021 REGULAR MEETING**

**PREPARED BY: G. LANDSBERG**

**APPLICATION NUMBER: 21-7522/88**

**ADDRESS: 603-609 E MILWAUKEE (AKA PEERLESS BUILDING)**

**HISTORIC DISTRICT: JAM HANDY/NORTH END – EAST GRAND BOULEVARD**

**APPLICANT/OWNER: ED FISH/PEERLESS REALTY, LLC**

**ARCHITECT: DS ARCHITECTS**

**DATE OF PROVISIONALLY COMPLETE APPLICATION: 10-14-2021**

**DATE OF STAFF SITE VISIT: 11-02-2021**

**SCOPE: DEMOLISH ADDITION AT 609 E MILWAUKEE; REHABILITATE BUILDING AT 603 E MILWAUKEE, INCLUDING WINDOW REPLACEMENT**

### **EXISTING CONDITIONS**

The subject property is a historically distinctive corner property with steel sash factory windows and transomed single-hung (essentially, triple sash) wood windows at the first-floor corner and extending across the first-floor Milwaukee facade. Erected in 1925, the building is of brick and steel frame construction, exhibiting dark red brick competently deployed in modest ornamental patterns; juxtaposed with modern concrete sills and a water table below the first floor window line. Window groupings are divided by brick piers, and the main entry on Milwaukee has a brick portal slightly relieved from the main building façade. The top sashes in the wood windows show painted gold lettering from a previous manufacturing tenant. The building is notable in the district for its almost completely intact set of original windows.



*View of existing conditions at 603 E Milwaukee, corner of St. Antoine and E. Milwaukee. Staff photo, November 2, 2021.*

Also included in the application is scope at adjacent 609 E. Milwaukee, which includes a non-contributing single-story concrete block structure that served as an addition to 603 E. Milwaukee. The remainder of 609 E. Milwaukee is undeveloped.

According to a description of the building in the Historic District Advisory Board (HDAB)'s report, the building served several light industrial uses over its active life span. It was originally built by the Greater Detroit Blackstone Company, and was used for both warehousing and office space. Other tenants over the decades included the Parsons Company (maker of kitchen cabinets), National Time & Signal Company, and Paholak & Rodgers, manufacturer of lighting fixtures. The building retains a high degree of historic integrity and appears to have surviving painted window signage from its last tenant, the Peerless Weighing Machine Company.



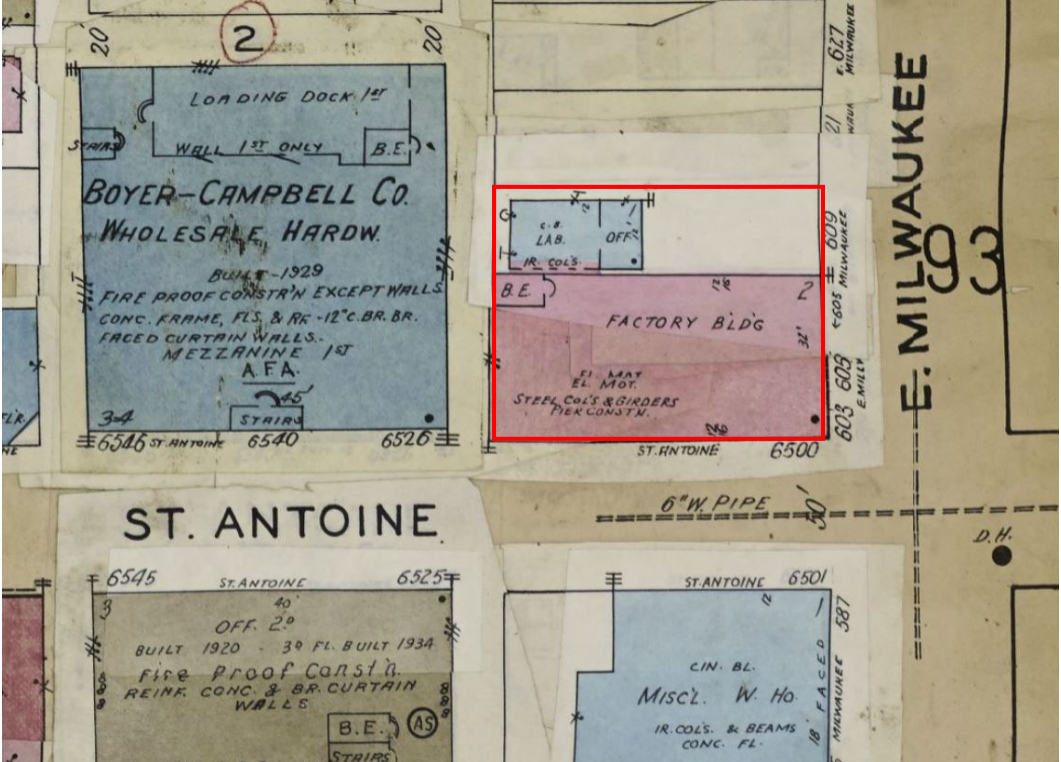
*Detail view of large wood windows at first floor. Staff photo, November 2, 2021.*



*Detail view of steel sash windows and concrete sill/brick at first floor. Staff photo, November 2, 2021*



Parcel view of vicinity, 603 E Milwaukee is outlined in yellow. Yellow arrow shows location of addition at 609.



1950 Sanborn map of same vicinity (orientation rotated, both parcels outlined). Subject building at 603 E. Milwaukee (corner of St. Antoine shown here in red to designate brick construction. The concrete block addition is the light blue element.



*View of secondary east elevation and alley, showing non-contributing concrete block addition. Staff photo, November 2, 2021*



*View of primary (front) elevation. Compare to proposal rendering, next page. Note juxtaposition of triple-sash wood windows with steel shop windows above. Staff photo, November 2, 2021*

**PROJECT DESCRIPTION**

Per the submitted drawings and documents, the building is proposed to be adaptively reused and divided into residential spaces, with five new entrances at the east elevation. The applicant proposes to demolish the concrete block addition at 609 E. Milwaukee, reconfigure/add some windows and door openings at the east- and north-facing elevations (non-primary), and replace the original steel sash factory windows and original wood office windows with new windows of the same type throughout. Other proposed work includes roof replacement/new metal coping, new light fixtures, replacement/addition of doors on non-primary elevations, installation of a new building sign and awnings, mechanical vents and new fencing/gates.



*Rendering of the proposed building, from the applicant's submission materials. Looking towards the north. Compare to existing conditions at staff photo, previous page.*

## STAFF OBSERVATIONS AND RESEARCH

- The Jam Handy/North End – East Grand Boulevard Historic District was established in 2015 to safeguard the dwindling historic stock of industrial structures in the Milwaukee Junction area. The boundary of the district extends south specifically to include this particular building and make it subject to such protection. The building is identified as a contributing structure in the district report.
- No design consultation with historic preservation staff was requested or provided prior to the architect’s preparation and submission of these drawings.
- Staff finds that the building’s windows, including steel sash juxtaposed with distinctive wood windows at the first-floor corner, are the principal and most important historic expression of the building.
- In addition to providing a few examples of deterioration, the applicant gives several reasons for seeking window replacement as analyzed below (applicant reasons presented in italics):
  - *“The windows are not thermally broken and not energy efficient.”*
    - Staff agrees, but notes that this is a common complaint concerning historic windows and has never been an historically appropriate rationale for their replacement. National Park Service Guidelines and decades of precedent in historic preservation offer several options for improving the performance of historic window openings, including the addition of storm windows. To suggest that a distinctive character-defining feature should be replaced because it does not meet modern day code or energy performance expectations is inconsistent with standard preservation practice.
  - *“These windows will not accept new energy efficient double pane glass.”*
    - Also correct, same analysis as above.
  - *“In our proposed configuration, we do not want operable windows on the street level for safety and security.”*
    - This issue is driven by the proposed adaptive reuse program for the building. Other solutions may be available that do not require destruction of the historic windows.
  - *“On the second floor the current operable mechanism on the window is out of the ADA reach range.”*
    - Staff is not convinced that this problem cannot be solved in another way, perhaps by modifying the internal hardware. This is also an issue created by the proposed adaptive reuse program. ADA concerns in historic buildings should be addressed in the most minimally destructive way possible.
  - *“Replacing the rotted wood members would be a challenge because it would require custom profile tools to be manufactured.”*
    - The proper rebuilding and restoration of wood windows is a common activity for property owners and woodworkers throughout Detroit’s historic districts. Staff not only sees relatively little deterioration in these particular windows, but is confident that any required repair is both feasible and technically reasonable.
- Overall, staff architects were impressed with the condition of both the steel sash and the wood windows, and have seen far worse examples successfully restored. Although isolated examples of deterioration were observed in the field, and in photos provided by the applicant, staff’s professional opinion is that repair of such deterioration is both feasible and technically reasonable in the Detroit rehabilitation marketplace, and is consistent with National Park Service standards and guidelines. As discussed above, staff is similarly confident that concerns around energy performance or operation can be mitigated through creative technical interventions short of wholesale replacement of these outstanding windows. There is no reason that any proposed adaptive reuse must be allowed to proceed if it endangers such critically important historic character.
- Staff finds that the modifications to the east and rear (alley) elevations, including additional proposed doorways on the east elevation, and addition/reconfiguration of openings thereon, to be appropriate given the minimal status of these secondary elevations in establishing historic character. Proposed paint colors, taken from HDC color charts, are acceptable.

- The new front door at the Milwaukee elevation is acceptable to staff.
- Staff would prefer a more modern/simpler light fixture than the “historic” reproduction style proposed, but does not find the proposed fixture inappropriate under the standard of review.

## ISSUES

- The applicant gave several reasons for window replacement, which staff has analyzed above. Should the window replacement proposal be approved, the building will be stripped of nearly all of its distinctive historic character, leaving only the brick.
- While staff architects do understand some of the technical reasons/rationale for changes to the windows to accommodate the proposed residential use, Secretary of the Interior Standard for Rehabilitation #1 makes clear that **“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...”** If the proposed adaptive reuse cannot be completed without destroying nearly all of the building’s character-defining features, the Commission should reject it under the Standards, and encourage the applicant to pursue a more appropriate adaptive reuse project. There is no by-right expectation that a building in a historic district can or should be transformed to accommodate a new use that may be incompatible with the retention of its historic features.
- Along with inappropriate replacement of distinctive character-defining windows, the universal replacement of the two dramatically *different* types of windows with one new type of window creates an ahistorical uniform reading of the building, removing the clear and historically important distinction between the wood “front office” single-hung/triple-sash type windows at the first-floor front and corner juxtaposed with the steel sash “shop floor” type windows on the remainder of the building. The proposed design not only strips the building of rich historic character, but transforms it into a bland, uniform block that more closely approximates a modern facsimile of a historic building, rather than an actual century-old historic building in an industrial section of Detroit.
- The remainder of the scope, including roofwork, lighting, new signage, and reconfiguration of openings at the non-primary facades, presents no problems with respect to the Standards or Guidelines.
- The existing historic painted signage in the transom panes, part of the wood windows, should also be specifically preserved as part of any rehabilitation project.

## RECOMMENDATION

Section 21-2-78, Determinations of Historic District Commission

### **Recommendation 1: Replacement windows**

Staff finds that the proposed replacement of original wood and steel sash windows removes historic materials, destroys distinctive features, and destroys the historic character of the building. Staff therefore recommends that the Commission issue a Denial for the subject work, as it does not meet the Secretary of the Interior’s Standards and the defined elements of design for the historic district, specifically Standards:

- (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.
- (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.
- (5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

(6) 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

(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.

**Recommendation 2: Remaining work items**

Staff finds that the remaining proposed work items preserve historic materials, distinctive features, and historic character while accommodating a new use for the building. Staff therefore recommends that the Commission issue a Certificate of Appropriateness for the subject work, as it meets the Secretary of the Interior's Standards and the defined elements of design for the historic district.