

**STAFF REPORT 04-13-2021 REGULAR MEETING**

**PREPARED BY: G. LANDSBERG**

**APPLICATION NUMBER: 21-7744**

**ADDRESS: 603 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: 03-17-2021**

**DATES OF STAFF SITE VISIT: 11-02-2021, 11-12-2021, 01-14-2022**

**SCOPE: REPLACE WINDOWS**

### **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 East 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.



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

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.*

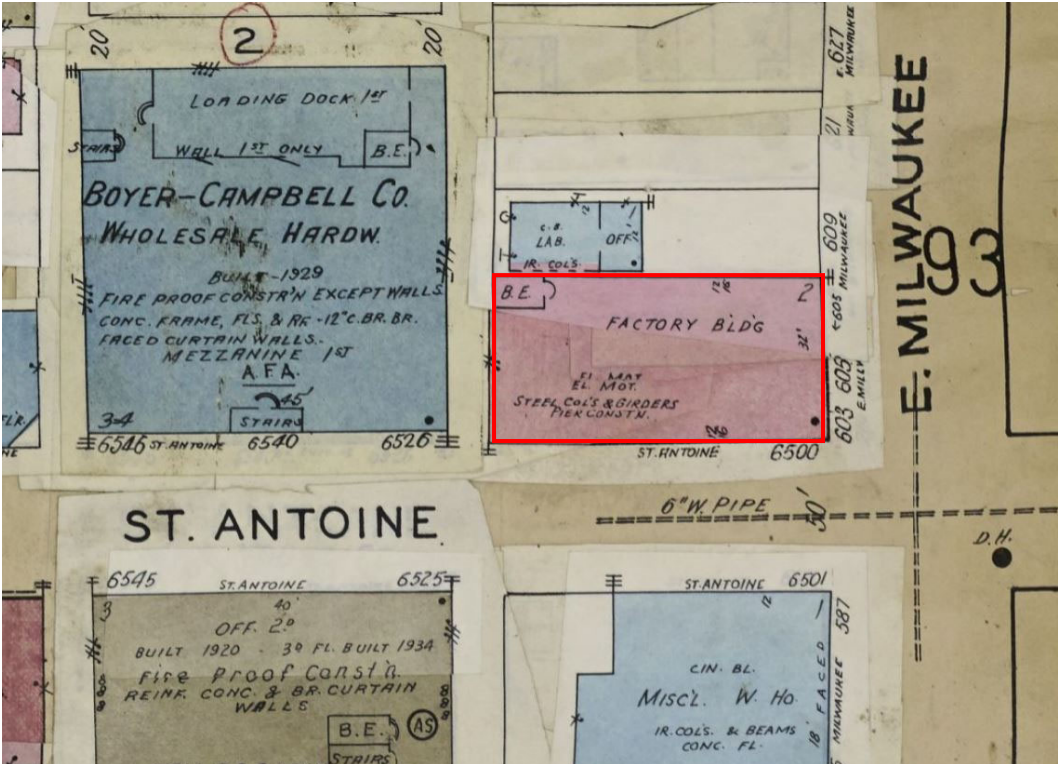


*Detail view of steel sash windows and concrete sill/brick at first floor. Staff photo, November 2, 2021*





Parcel view of vicinity, 603 E Milwaukee is outlined in yellow.



1950 Sanborn map of same vicinity (orientation rotated, parcel outlined). Subject building at 603 E. Milwaukee (corner of St. Antoine shown here in red to designate brick construction).





*Above and below images: Non-historic steel sash windows indicated with red, historic steel sash windows in yellow, wood windows in green. Front and side primary elevations only. Staff recommends preservation of all yellow and green locations.*





## PROJECT DESCRIPTION

Per the submitted drawings and documents, the applicant proposes to replace the original steel sash factory windows, non-historic steel windows, and original wood office windows with new windows of the same type throughout. This is scope that was denied approval at the November 2021 Meeting of this body. Per the Rules of Procedure, the applicant has returned with additional information, including cost quotes for rehabilitation work, which makes the scope eligible for additional review by the Commission.



*Updated rendering of the proposed building, from the applicant's submission materials. Looking towards the north.*

## 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.
- 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.
- **Wood Windows:**
- The applicant has provided additional analysis in the form of a report from Blackberry. The restoration of the wood windows is priced at \$91,000, more than the "replacement" cost of \$78,000 for aluminum window units, and less than \$96,000 for new wood units.
- The window installer states that the finished project will not necessarily be free of all possible defects or future deterioration. This is a known trade-off in the preservation of historic materials or assemblies; perfect restoration is not always feasible, nor are warranties similar to a manufactured product possible. This does not alter the responsibility to preserve distinctive features per the Standards.
- The report states that it is the opinion of a certain NPS/Technical Preservation Services reviewer that the retention of "original materials" is somehow secondary or less important than preservation of "profiles, design, and dimension." This is simply incorrect. Staff was not able to independently confirm this claim, which runs against 50 years of National Park Service guidance and actual field practice that repair, *even if not perfect*, is always preferable to replacement of distinctive character-defining features. Replacement is the last resort, never the first. This theme is continuous throughout the Standards and Guidelines,

including Standard 5 and 6:

**(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.**

...and many statements found in the NPS guidelines, including this excerpt from the introduction thereto:

***It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature under certain well-defined circumstances, they never recommend removal and replacement with new material of a feature that--although damaged or deteriorated--could reasonably be repaired and thus preserved.***

- It is evident to professional staff, given our own expertise and experience in the field, that these wood windows are not deteriorated beyond repair, and can “reasonably be repaired” per NPS Guidance. Destroying them, instead of somehow protecting the future “architectural heritage and design” of the building, will instead have the unfortunate result of substantially and irreversibly damaging such character. These are important and distinct windows, and should be preserved.
- Although replacements should only be considered if the originals are determined beyond repair under Standard 6, staff does note that the proposed replacements, per the elevations below, are poorly matched and do not convincingly replicate the original historic expression. Defining features of the historic window, in addition to its authentic detailing, include their original materiality, historically lettered glazing, and hand-crafted details.



- Concerns about heating or energy efficiency can and should be addressed by the selection and installation of appropriate storm windows, similar to thousands of such installations protecting historic wood windows in historic districts in northern cities.
- As noted in the previous November 2021 staff report, 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 minor deterioration in these particular windows, but is confident that any required repair (i.e., for the sills as mentioned in the report) is both feasible and technically reasonable.

- **Steel sash windows:**
- We have now received, via this new application, a quote for repair of the windows.
- The report characterizes the windows as being in “very poor” condition. Staff disagrees and would characterize them as poor to fair. These are industrial windows built for an industrial use, and should not be held to an appearance or performance standard for windows that may be desirable for a modern luxury residences. There are areas of substantial decay, but repair is feasible.
- The remaining steel windows at the primary elevation on St. Antoine (staff counts ten, including one opening partially replaced with new) are distinctive character-defining features that define and establish the historic character of this property.
- Per the window installer’s report, the quote for steel window restoration (16 openings) is \$380,750. These include windows on the alley (north) elevation. Masonry repair and replacement necessary to remove and reinstall the windows is not included, nor is an additional \$120,000 estimated for interior storm windows to accommodate the preferred use of “residential living space.” It is unclear what the cost would be for only the ten (10) openings on St. Antoine (yellow arrows on staff diagram), which are most important to the building’s historic character. It is also not clear from the report if the modern replacements (red arrows on staff diagram) already installed in locations at the second floor front and near side would be retained or replaced as part of this cost, or in addition to it.
- The cost for 34 new aluminum windows (Quaker H450) throughout is given as \$287,500, a difference of approximately \$100,000. If the \$120,000 additional for the storm windows is added, as well as masonry work, the additional cost to the project appears to be in the range of \$250-300K to restore the historic windows to a high degree of functionality. Staff does not agree that an additional expense in this amount, given the expected value of the building after rehabilitation, is economically unreasonable or infeasible. If restoration work is limited only to those ten (10) historic steel windows along St. Antoine, the cost premium would presumably be even less.
- Staff has included in this report photographs from an unrelated project, with your staff writer as the consulting historic architect, for a historic rehabilitation project for a National Park Service property on the east coast, which featured steel industrial windows in very poor condition. The windows were restored and reinstalled.
- The Quaker H450 Series replacement windows proposed are appropriate and compatible for locations where no historic windows remain (red arrow locations on the diagram, and alley side/east side), or, should the Commission decide that the original steel windows are beyond feasible repair, in all steel window locations.

## ISSUES

- 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 distinctive 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.
- In staff opinion, the remaining steel sash and wood windows at the two primary elevations (i.e., along St. Antoine and East Milwaukee) can and should be retained for the proposal to qualify for a COA



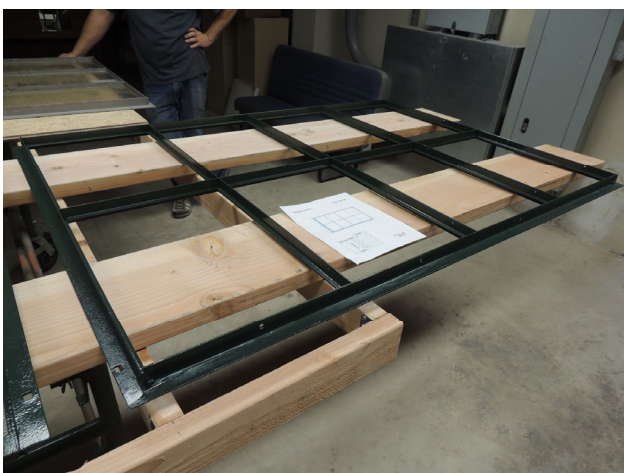
## EXAMPLE OF STEEL SASH WINDOW RESTORATION



Before restoration (treated and primed)



During restoration (installation of new members/Dutchman repairs)



Finishing/Painting/Reglazing





## **RECOMMENDATION**

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

#### **Recommendation 1: Replacement windows at locations of original historic windows at St. Antoine/East Milwaukee (i.e., primary) elevations**

Staff finds that the proposed replacement of original wood and steel sash windows at the primary St. Antoine and East Milwaukee elevations 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: Replacement windows in remaining locations, including locations of non-historic windows at St. Antoine/East Milwaukee elevations**

Staff finds that the proposed replacement of windows at *non-primary* elevations (alley and east elevations), and the replacement of *non-historic* steel windows at the primary elevations (St. Antoine/East Milwaukee), to be appropriate per the Secretary of the Interior's Standards and the defined elements of design for the historic district. Staff therefore recommends that the Commission issue a Certificate of Appropriateness for this work.