



Ms. Martha MacFarlane-Faes
Deputy SHPO/Director, Resource Protection & Review
State Historic Preservation Office
300 North Washington Square
Lansing, MI 48913

January 9, 2022

RE: Initiation of National Historic Preservation Act Section 106 Consultation for Court Security Building Upgrades and Accessible Entry Improvements - Theodore Levin United States Courthouse, 231 W Lafayette Blvd, Detroit, MI 48226

Dear Ms. MacFarlane-Faes,

The U.S. General Services Administration (GSA) is undertaking a project that will update and relocate the security screening stations at both primary public building entrances of the Theodore Levin United States Courthouse (Levin USCH). The project will also provide compliant accessibility access off Lafayette Street. Levin USCH was completed in 1934 in the Art Moderne style and is listed in the National Register of Historic Places. This letter seeks to initiate consultation under Section 106 of the National Historic Preservation Act, as amended and respectfully requests concurrence with the GSA's determination of effect.

Property Description and Background

Levin USCH is located at 231 West Lafayette Boulevard, Detroit, Michigan and takes up the entire city block, with primary entries located along Lafayette (public) and Fort (employee) Streets. It was designed by Detroit-based architect Robert O. Derrick. Construction began during the Great Depression in April 1932 and the building opened in March 1934. The building's twelve-story façade is smooth-cut limestone with a polished black granite water table.

The building houses the United States District Court and other federal agencies. The main entrances at Lafayette Boulevard and Fort Street accommodate 2,500 and 2,100 persons a week respectively. Each of these entries is centered on the elevation and features a prominent set of granite stairs leading to recessed loggias where three entry portals reside, each with a set of double doors leading to an internal vestibule and staircase. The entries open to a recently restored, architecturally significant, public concourse that runs the length of the building. Currently, only the Fort Street entrance offers a ramp into the building that is accessible but is not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS). There is a substantial grade change between the two entrances. Therefore, persons entering at Lafayette Boulevard must traverse nine steps to enter the building while those entering on Fort Street have direct access to an elevator bank. Both entrances require visitors to be security-screened upon entry.

Undertaking

GSA's proposed undertaking seeks to install new security screening stations at the subject historic property as well as new accessible ramps at the primary public entry, in order to meet the United State Marshal Service Judicial Security Systems and ABAAS requirements. Although the building currently has operating screening stations, they were not comprehensively designed specifically to fit the building. Now over 20 years old, the existing stations are antiquated, no longer meet security regulations, are not accessible and are incompatible with the historic nature of the lobby. This project attempts to rectify outstanding security and accessibility concerns while minimizing the visual and experiential impact the existing stations have to the building's historic entry sequence.

The project is part of a larger government-wide initiative called the Capital Security Program (CSP). The purpose of this effort is to provide an assessment of existing facility conditions present in existing courthouses throughout the country and identify security deficiencies that affect court operations, particularly in circulation and critical adjacencies. A review of the existing Levin USCH facility was conducted and security deficiencies assessed. The study proposed security improvements, including physical renovations, in lieu of new construction, that would provide additional protection for the courthouse. The evaluation highlighted three priority areas requiring physical renovation in order to meet current security mandates. These three areas included public screening station modifications, sally port construction and prisoner elevator security improvements. Each of these project components are further defined below.

Security Screening Stations/Accessibility Compliance

Designing a security screening station for a building that was never intended to have a station is a complex process. This is particularly the case for both entry points at the Levin USCH. As a result, each entry was designed specifically to meet the needs and security requirements at that location. Currently, the Lafayette Street entrance is the public entrance and primary address for the building and the Fort Street entrance is for employees only. However, during peak demand times, overflow visitor screening also occurs at the Fort Street entrance. Please note that all people entering the building are fully screened, so both entrances require stations. Further, even though it is not the primary public entrance, Fort Street is currently the only one with an accessible ramp.

Lafayette Street Accessibility Entrance

The project scope includes:

- The construction of two new compatibly-designed accessible ramps
- Wheelchair lift and associated entry vestibule modifications
- Relocation of fire department connection
- Associated electrical work

Due to the complexity and scale of the project, GSA required the design team of GH Forbes to develop several concepts for the overall project. Those concepts were evaluated by a board of professional design peers through a process called Design Excellence. During this process, two initial schemes were developed for the Lafayette Boulevard entrance. Both schemes removed

the screening station out of the main lobby and converted the original entrance vestibule into an exit only. Barrier free access was handled differently in each proposal, one provided access through an exterior ramp and the other cut a hole into the building at ground level to provide access for an internal wheelchair lift. Both schemes required modification of the “South” porch wall to make way for the new entry. In addition, existing rooms on the interior, located behind the bank of elevators, would be demolished (restroom, electrical room, and custodian’s closet) to make room for the new security screening area. During the review of these schemes, the peers felt that the barrier free access, in conjunction with the associated screening stations, provided a circuitous and indirect path into the building. They felt that the proposed options negatively impacted the symmetry of the formal facade by severely encroaching on the grand stair and portico and essentially removed the public from the building’s original entry sequence. Furthermore, the public exiting the screening station would be funneled right to the elevator lobby and never experience the main concourse. As a result these two concepts were rejected and a third option developed.

The peers and regional preservation staff were adamant that the building’s symmetry and sense of grand entry be retained in the final design. As a result the design team developed a solution that installs two ramps to create visual symmetry that reflects the language of the existing building. In this preferred option, the existing stair will remain in situ, and the new ramp will be angled and extended to meet the existing top step. The 45 degree angle of the ramp platform that connects to the existing covered porch will enable the existing stairs to maintain their grand central stair concept, consistent with the original design. The original door configuration and entry sequence are maintained. The ramps are located and detailed so they become visually secondary to the stair, blending into the solid granite base of the existing building. The existing stone of the monumental stair will remain in place.

In order to mitigate the level change from the exterior porch to the elevation of the public concourse within the building, a new opening will be created through the west wall of the existing glazed entry vestibule. The metal wall of the existing enclosure will be carefully removed and retained on site. A barrier free corridor will be created to provide access to an accessible lift to the screening area. All other visitors will proceed through the existing vestibule and up the original lobby stairs for security screening. (Please see enclosed drawings, photographs and additional descriptions below for more information).

Lafayette Street Security Screening Modifications

The project scope includes:

- The installation of a new glass-enclosed bullet resistant guard booth.
- Repositioned magnetometer and x-ray equipment.
- Glass partition walls/gate to separate the visitor queuing area from the screening station
- Egress access
- Associated electrical work
- Modification to the existing stone wall

The existing layout of the screening station requires the visitor to walk up both the entry portico stairs and nine internal stairs to reach the screening station in the concourse. As a result, line queuing happens on the stairs, which is not ABAAS compliant. The public’s view of the lobby is significantly impacted by the screening booth and associated apparatus required for screening. Initial design proposals looked at various ways to remove the screening station from the top of the

stairs by creating a new corridor just behind the front wall of the building to accommodate queuing and required stations. Both scenarios removed the visitor from the public lobby by funneling them directly to the elevators. The schemes also removed direct lines of sight for the guards, made irreversible changes to architecturally sensitive areas, and required significant structural changes to the building. Ultimately, these schemes were rejected during the aforementioned Design Excellence process.

The preferred design scheme proposed for the Lafayette Street screening station strives to provide the visitor with a direct view of the historic concourse by tucking the security equipment out of view. Visitors will enter through the original entry vestibule, utilizing the leftmost set of doors, then a glass partition wall will route them up the original stairs and off to the side for screening. The glass walls will enable the visitor to continue to experience the building's original sense of entry, while providing the required secured separation between screened and unscreened visitors. The guard station will repurpose lesser used space that is adjacent to a secondary elevator. Portions of a historic arched wall separating utility space from the concourse will be modified to accommodate this change. All materials and door surrounds will be salvaged and retained for future use. Once through the security screening, the visitor will re-enter an anteroom adjacent to the main lobby and then proceed into the concourse for building access.

Fort Street Security Screening Modifications

The project scope includes:

- The installation of a new glass-enclosed bullet resistant guard booth
- Repositioned magnetometer and x-ray equipment
- Glass partition walls/gate to create a visitor queuing area before the screening station
- Egress access
- Associated electrical work
- Removal of the radiator enclosure

The Fort Street entrance is currently utilized for employees and overflow visitor screening. Due to the existing configuration of the lobby, the area allotted for screening is extremely tight. There is no queuing area within the building and visitors are screened immediately upon entry just past the doors and in front of the elevators. This entrance currently provides barrier-free access to the building, but is not ABAAS compliant. Initially, during the development of the courts-led CSP report, an idea was proposed to shift the main entrance of the building from Lafayette to Fort Street and install a one-story, external "glass box" screening pavilion to accommodate visitor load. GSA preservation staff were extremely concerned about the impact a weather-enclosed addition, of any sort, would have on the building. As a result, GSA worked with the courts on developing the alternate schemes for Lafayette Street in order to accommodate the visitor load, enabling Fort Street to become a strictly employee-only entrance.

At the Fort Street entrance, an expanded version of the existing screening station was developed. Employees at this entrance will be separated from the rest of the building by a glass partition. The partition extends into the entry vestibule in order to designate one set of exterior doors as entrance-only and two sets for exit-only. The security screening equipment will be moved to the

back of the elevator lobby and glass partitions will direct people to that location without blocking the view of the concourse as they enter. This scheme was selected because it was economically feasible while causing the least amount of physical impact on the building. However, the removal of an existing radiator enclosure is required to accommodate the new guard booth required for screening.

Additional Project Work within Building

Sally Port Construction

The installation of a new prisoner sally port in the basement/garage will separate prisoner circulation from service/public circulation. An existing elevator will be modified to be a dedicated prisoner-movement elevator. This secure enclosure is proposed for an area that was significantly modified during a recent capital construction project submitted and approved by your office in 2017 (ER-910604) and, therefore, will not impact original material or building design. Drawings have been included.

Second Floor Modifications

The second floor of the building was originally the post office sorting area. When the post office moved out of the building in the 1960s, the area was renovated into courtrooms. When that occurred most of the original material was removed, except for the two main elevator cores. The project will reconfigure a portion of the floors north end to make room for additional tenant space. The existing marble wainscot in this area is not original (see original drawing sheet); it will be removed and salvaged for future reuse. Project work in this area will have limited impact on original features or materials. Proposed modifications to this floor include:

- Reconfiguration of tenant space to accommodate prisoner transport
- Airlock doors to accommodate prisoner passage
- Existing (non-historic) elevator modification (for prisoner movement separation)
- Addition of prisoner holding cells to facilitate prisoner delivery to eight courtrooms on the 2nd floor
- Partial removal of non-original marble wainscotting in the side corridor

Applying the Criteria of Effect and Defining the Area of Potential Effect

GSA Historic Preservation subject matter experts worked closely with the design firm and other GSA subject matter experts during design of the chosen solutions. As previously mentioned, several scenarios were proposed and evaluated for their impact to the building physically, but rejected due to their impact to, and the public's connection with, historic spaces.

GSA has applied the criteria of adverse effect and finds that the undertaking will directly affect the historic property. The Area of Potential Effect (APE) for the undertaking is the legal boundary of the Theodore Levin US Courthouse (see Attachment A slide #3). This boundary is bound by Shelby Street to the east, Lafayette Street to the north, Washington Avenue to the west and Fort Street to the south. The APE includes the entire parcel inclusive of Levin USCH and the adjacent sidewalk. Prior to the construction of the existing courthouse an earlier courthouse sat

on the site. Due to the limits of construction for both buildings, archaeology is considered to be of low concern for this project.

In keeping with the Secretary of the Interior's Standards, the new work for the project has been minimized as much as possible, differentiated from the old and designed to be compatible to the massing and scale of the building. Fortunately, many of the proposed project modifications will cause little to no impact to historic spaces. However, original material will be impacted by the new accessible ramps, the removal of the end wall of the entry vestibule and partial removal of the stone wall for guard station access. The project team and GSA have worked to design the ramps with a low profile, compatible materials and symmetry in order to nominally impact the building's original facade. The proposed accessible ramps will be pulled back and angled to have less visual impact in order to maintain the prominence of the entry stair. Alterations to interior, character-defining features have been limited to the removal of the entry vestibule end wall (for the wheelchair lift access corridor) and partial removal of the recessed stone wall just off the lobby concourse (for screening station access). Overall, the physical and visual impacts of this undertaking have been minimized to the greatest extent possible by selecting design solutions that emphasize the building's symmetry, original entry locations and formal entry procession for visitors. New materials will be compatible with the existing or translucent in order to maintain the public's visual connection with the historic concourse.

Documentation of the Undertaking

The following documentation of the proposed undertaking is provided to aid in your assessment of GSA's Determination of Effect on Historic Properties.

- MI SHPO Section 106 Review Project Summary Form
- Descriptions of the undertaking and APE are included above
- A description of historic properties within the APE is included above
- Attachment A:
 - A map of the project location (street level map) with APE
 - Existing site photos, descriptions and security layouts
 - Relevant drawings
- Attachment B: Drawing Set

Determination of Effect

GSA has identified the APE for the undertaking, applied the Criteria of Adverse Effect, and has determined that the project is designed in accordance with the *Secretary of the Interior's Standards for Rehabilitation*. Therefore, pursuant to 36 CFR Part 800, GSA submits the enclosed documentation for your review and concurrence with our determination that the subject undertaking poses **No Adverse Effect** to the character-defining features that qualify the property for listing in the National Register of Historic Places.

GSA used innovative approaches during the prior capital construction project, completed in 2020, to conserve and protect the character defining features of the Levin USCH. The current project

contributes to the ongoing need for innovative security solutions that address the safety needs of the building occupants. Executing this work helps solidify the long term occupancy and functionality of the courthouse while maintaining our historic resources. GSA believes that this solution will achieve both these goals.

Upon your concurrence with our determination, we are happy to provide a copy of this package to the local preservation commission to demonstrate our further compliance with Section 106 and how the project meets the Secretary of the Interior's Standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Regina A. Nally". The signature is fluid and cursive.

Regina A. Nally
Historic Preservation Officer
GSA, Great Lakes Region
230 S. Dearborn St. Suite 3600
Chicago, IL 60604

cc: Beth Savage, GSA Federal Preservation Officer

Enclosures Attachment A: Supplemental project documentation

Attachment B: Construction Documents (Drawings)