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August 13, 2020

Historic District Commission
Planning and Development Department
Coleman A. Young Municipal Center
2 Woodward Avenue - Suite 808
Detroit, MI 48226

Dear Commissioners:

The Parade Company's proposal for R. Thornton Brodhead Armory and its ability to meet legal requirements pertinent to this single-building historic district is a plan for demolition in the unconvincing guise of preservation.

While speaking much about preservation during the Historic District Commission meeting of August 12, 2020, the applicant's plan actually proposes over 2/3 *destruction* of the historic building – not the 2/3 preservation falsely claimed during the meeting. Some commissioners seemed to echo the erroneous preservation percentage claimed by the applicant.

A key component of the building's status on the National Register of Historic Places is its innovative architecture. The segment of the building slated for preservation – the drill hall – represents a minimum of the building's historic design. The balconies, offices, and classrooms surrounding the drill deck are all post-World War II additions. What you have for design in the north half of the building, then, is one large rectangular room with a few interesting architectural details on the exterior.

The bulk of William Buck Stratton's innovative design of Brodhead Armory is within the south half of the building. *90% of the architecturally-significant aspects of the building* are within the section of the building that the Parade Company intends to destroy. While repairs are definitely needed, the bones of the south section of the building are sturdy and strong.

Comments and submissions made by the applicant and affiliated attendees made the following facts clear:

- Preservation of the south section (office side) of Brodhead Armory would be an inconvenient impediment to the Parade Company's desire to build a float factory.
- The Parade Company does not have the financial means to preserve the south section of Brodhead Armory.
- The Parade Company has absolutely no *desire* to preserve the south section of Brodhead Armory and is fully committed to destroying it.

The “preservation” discussed in the Parade Company’s plan, other than the drill hall, centered on Brodhead Armory’s art. If even possible, of which I am not the least bit convinced, the cost of safe and effective excision of the building’s murals and plaster carvings – works totaling several thousand square feet – would be many millions of dollars. It was expressed by Mr. John Cox during the Commission meeting that the Parade Company, a non-profit organization, does not even have the money to deliver a complete proposal that includes architectural drawings and other detailed plans. Removal of the art would be far outside the financial means of such a cash-strapped non-profit corporation. Long-term maintenance and display of these works of art would, financially, be similarly out of reach.

On the long-shot chance that they actually could afford the removal of the murals – and they were not destroyed in the process – they gave no indication, either in the meeting or in their presentation materials, of how they would display them. Edgar Yaerger’s mess hall murals would need to be placed in a room of identical dimensions, otherwise, their artistic significance would have no context. The same can be said of David Fredenthal’s wardroom mural and bar area mural.

If the Historic District Commission allowed the Parade Company to proceed, the company would inevitably reach a point at which it would plead poverty and inability to save the art, and thus, its inability to meet its obligations to preserve any significant aspect of the building and its historical treasures.

Most importantly for the Historic District Commission's deliberations, the Parade Company’s plan as presented would be *in violation of six of ten* of the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings – which the Commission is obliged to observe. Specifically, the guidelines in question (as found on the Historic District Commission’s website) are:

“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.”

- Destruction of the south section the building is not a minimal change.

“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.”

- Destroying most of the spaces in the building would not be avoiding such alterations.

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

- Demolishing the vast majority of architectural components of the building is not preservation.

“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.”

- Razing the south section of the building is neither repair nor replacement.

- Replacement of the paned windows with solid sheets of glass does not meet this requirement.

“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.”

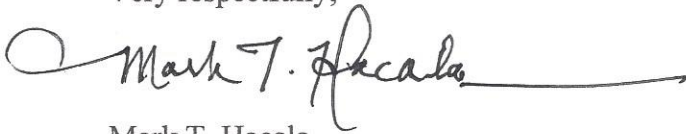
- Destruction of the south section of the building is destroying historic materials and would not protect the building’s integrity.

“10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”

- If they put in their new building and it were eventually removed, the south section of the original building would still be gone.

It is clear, based on the Parade Company’s plans for the R. Thornton Brodhead Armory, that if they were to secure this property they would do the exact opposite of preservation and, in so doing, be violating the majority of applicable Federal guidelines. It is equally clear that Historic District Commission cannot approve this plan if it is bound to use those guidelines as the basis with which to make its decision, as to do so could potentially put the commissioners themselves in administrative or legal jeopardy.

Very respectfully,

A handwritten signature in cursive script that reads "Mark T. Hacala". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Mark T. Hacala
Master Chief Petty Officer
U.S. Navy (Retired)