

Sarah Hayosh

Resident, Joliet Townhouse Cooperative

May 13, 2025

Detroit Historic District Commission

Coleman A. Young Municipal Center

2 Woodward Ave., Suite 808

Detroit, MI 48226

Re: Detroit Thermal's application # HDC2025-00243 in the Lafayette Park/Mies van der Rohe Historic District. ADDRESS: 1395 ANTIETAM, 1 LAFAYETTE PLAISANCE, 1301 NICOLET PLACE, 1300 NICOLET PLACE, 1301 JOLIET PLACE, 1300 JOLIET PLACE, AND ADJACENT RIGHTS-OF-WAY

Dear Detroit Historic District Commissioners,

I am a resident of the Lafayette Park/Mies van der Rohe Historic District and a member-owner in the Joliet Townhouse Cooperative. I am writing regarding Detroit Thermal's application to install steam infrastructure in our neighborhood. I want to express my strong opposition toward the Commission granting Detroit Thermal either a Certificate of Appropriateness or a Notice to Proceed.

In addition to Lafayette Park/Mies van der Rohe being designated by the City of Detroit as a Local Historic District it is also a federally recognized historic district, listed in the National Register of Historic Places since 2003, and in 2015, was elevated to the status of a federal National Historic Landmark, a top tier federal designation. The Detroit Historic District Commission's purpose (HDC) is to ensure the preservation of historically and culturally significant areas of the City which are designated by City Council as Local Historic Districts.

So many residents and professionals have already shared important information and testimony on the historical significance of the landscape and the harm that Detroit Thermals' proposal would wreak on this local¹ and nationally² treasured landscape. It has already been detailed, through other's letters submitted to the HDC, on "how Detroit Thermal, over the past 8 months, has clearly proven itself incapable of performing work to the standard of a local historic district"³; how a "significant amount of historic preservation guidance, codified ordinance, and preservations frameworks provide clear reasoning as to why this application should be denied"⁴, and specifics on why the HDC "cannot issue a Notice to Process as a matter of law"⁵.

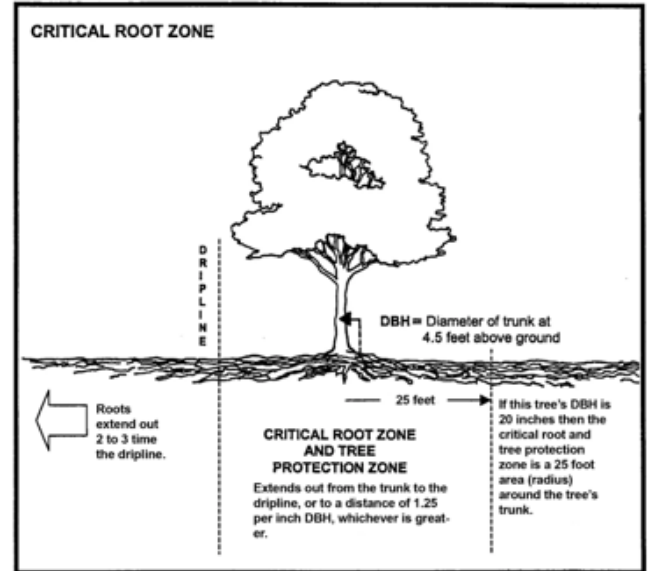
There is clearly no basis upon which the Commission could deem it appropriate to allow Detroit Thermal permission to move forward with its proposed plans.

I want to highlight a number of points specific to how Detroit Thermals plans would destroy our nationally recognized landscape and the plant material within, and how the so-called "tree protection" shown in Detroit Thermal's plans are both misleading and wholly insufficient.

1. Detroit Thermal's plans are inaccurate and misleading to permitting officials and residents because DT's plans do not include many trees that currently exist in the landscape within the site plan area. **Detroit Thermal has failed to identify, locate, and mark on their plans at least 20 mature trees, including large canopy and understory trees which would be impacted within the construction area.**
2. When compared to our tree survey completed by a professional arborist, **Detroit Thermal's plans underestimate the actual size of trees in our landscape.** We have found most of the trees shown on the plans Detroit Thermal submitted to HDC to have underestimated and inaccurate sizes listed, as measured in tree trunk diameter at breast height (DBH).
3. **Detroit Thermal's plans do not even show the full extent of all the impacted property which will be required to access the construction site,** if they enter our property from the east through Lafayette Plaisance Park to access the construction gate shown on their plans. There are additional mature trees and shrubs to the east of the black fence on our Co-op property, and on City Park property that would be at risk, and they are not even shown in the plans.
4. **No understory trees, shrubs, or perennial plant material are even shown in Detroit Thermal's plans, underscoring their complete disregard for this historic landscape designed by Alfred Caldwell.** The landscape contains canopy trees, understory trees, as well as shrubs that are original to the initial landscape planting from the late 1950's-early 1960s. As this plant material is multiple generations old, **it would be impossible to "restore" it "in-kind"**. Some of the species would be irreplaceable due to lack of commercial availability.
5. **Our co-ops have meticulously cared for, maintained, and stewarded this nationally recognized historic landmark.** All this stewardship is managed via countless hours of volunteer co-operative board members and additional residents' volunteer times, as well as the thousands of dollars our cooperatives spend each year (via HOA dues) to maintain the landscape and its historical integrity.
6. **The Detroit Thermal Plans state "no mature trees [are] to be impacted" which is undeniably false, based on professional opinion.**
7. **There are multiple trees within the site work zone which do not have ANY tree protection shown at all, to their demise.**

8. Trees need roots to stay alive, remain upright, grow larger, and defend themselves from pests, pathogens, and decay. Roots do this by providing trees with stability, access to water, access to nutrients, and cultivating symbiotic relationships with beneficial soil biota. **The *minimum* amount of roots trees need for survival are called the “critical roots.” These critical roots exist in the soil surrounding the tree, called the “Critical Root Zone”.** The *full* root zone of the tree often extend 2-3 times beyond the distance of the Critical Root Zone.

9. **The Critical Root Zone typically extends beyond the dripline of a tree, and is professionally, and often legally, defined as a circle with a 1.0 to 1.5-foot radius for each inch diameter of the trunk of a tree at breast height (DBH).** That means, for a tree with a 20-inch diameter at breast height (DBH), (with a standard of 1.25 feet for each inch of trunk diameter) the Critical Root Zone would be a 25 feet radius from the trunk of the tree (see DNR diagram⁶).



Reference Source: Department of Natural Resources. Washington State. 2014. |

10. **Detroit Thermal’s proposed “tree protection” is dangerously insufficient and would devastate the health of the trees and compromise the safety of our active playground, community greenspace, and walking paths.** The size of the “tree protection” fencing shown on Detroit Thermal’s plan averages a 5-6 foot radius from the trunk of the trees, which, based on industry standards, would only provide appropriate protection for trees with a single trunk diameter (DBH) of 4 inches or less. There are only a couple trees in our landscape of that small size.
11. **There are at least 12 mature trees with Critical Root Zones that would fall within Detroit Thermal’s proposed excavation, or “open cut zone”, which could prove to be fatal. Trees that have roots cut within the Critical Root Zone are at great risk for their root system to become unstable and fail (causing the tree to lean or fall over, if it is not removed in time).** In addition to the destruction of this natural and cultural resource, it would present a safety hazard, risking lives, and increasing liability, resulting in increased costs for our co-op members.
12. Additional tree protection fencing extended beyond the Critical Root Zone is recommended for mature, rare, culturally, and/or environmentally significant trees, and as such, **additional protection should be given for historically significant landmark trees**, such as the 60+ year old trees in our community, which has National Historic Landmark status granted by the Department of the Interior, in addition to its Historic District Designation by the City of Detroit.

13. In addition to its insufficient protections from cutting critical roots due to excavation and trenching, **Detroit Thermal's "tree protection" plan does not sufficiently protect the roots from compaction from heavy machinery, stockpiles/ loads of soil, gravel, pipes, or other heavy material.** This type of construction activity should not occur under the dripline of the canopy of the trees. Even temporary heavy loads within the full root zone of trees will damage the fibrous root system of the trees, which compromises the health and longevity of the trees. If surface level construction activity (driving, stockpiling, heavy material placement) is to occur near mature trees, it needs to be relegated outside the canopy's dripline. Even then, if construction activities are to occur within a tree's full root zone, additional preventative and protective actions must be taken to mitigate and reduce the damage to the tree's root system, none of which have been outlined in Detroit Thermal's Plans.

Please see supporting images on pages below.



1. The extent of the mature tree canopy is evident from this aerial view of the neighborhood.



2. This closer view of the area where most of DT's major excavation and construction activity is shown. Notice how the tree canopy almost completely covers the site, leaving no space for construction activities to occur without significantly damaging the trees' root systems.



3. Tree canopy view from second story interior.
S. Hayosh, Aug 2021



4. Tree view from ground level, area of major proposed construction
S. Hayosh, April 2025



5. Historic playground landscape with shade from mature trees, facing NW.
S. Hayosh, Oct 2022



6. Active and well-used playground, facing SE.
S. Hayosh, April 2025



7. Historic Landscape in area of DT-proposed major construction facing W.
S. Hayosh, May 2025



8. Historic Landscape in area of DT-proposed major construction, facing NW.
S. Hayosh, May 2025



9. Ferns and other ground cover present in historic landscape. S. Hayosh, May 2023



10. Pachysandra ground cover and other trees and shrubs present in historic landscape, facing SW.
S. Hayosh, May 2022



11. Flowering Dogwood, another species present in historic landscape, Facing S. S. Hayosh, May 2024



12. Example of mature Honey Locust, Crab Apple tree and Yew shrubs with critical root zones located within proposed excavation area, facing E. S. Hayosh, May 2023

To reiterate, Detroit Thermals' proposal would wreak havoc on the Lafayette Park/Mies van der Rohe Historical District, significantly and irreversibly damaging the historic landscape and National Historic Landmark. There is clearly no basis upon which the Historic District Commission could deem it appropriate to allow Detroit Thermal permission to move forward with its proposed plans.

Thank you for your time and consideration.

Sincerely,

Sarah J. Hayosh

Resident, Joliet Townhomes Co-operative

References, including other letters submitted to HDC:

- 1) K. Talley, Loggia Preservation: https://detroitmi.gov/sites/detroitmi.localhost/files/hdc-public-comments/2025-05/EMAIL%20ATTACHMENT_2025-05-12_Lafayette%20Park_Letter%20to%20HDC_May%2012%202025.pdf

- 2) D. Sanford, US Dept of the Interior: https://detroitmi.gov/sites/detroitmi.localhost/files/hdc-public-comments/2025-05/Lafayette%20Park_Steam%20Heat%20proposal%20City%20of%20Detroit.pdf
- 3) J. Fidler: https://detroitmi.gov/sites/detroitmi.localhost/files/hdc-public-comments/2025-05/EMAIL%20ATTACHMENT_2025-05-11_20250511_Letter%20in%20Opposition%20to%20Detroit%20Thermal%20Application%20for%20Lafayette%20Park%20Work.pdf
- 4) K. Schronce: https://detroitmi.gov/sites/detroitmi.localhost/files/hdc-public-comments/2025-05/EMAIL%20ATTACHMENT_2025-05-13_Detroit%20Thermal%20Application%20AppHDC2025-00243_opposed.pdf
- 5) S. Woodward: https://detroitmi.gov/sites/detroitmi.localhost/files/hdc-public-comments/2025-05/EMAIL%20ATTACHEMENT_2025-05-12_Woodward%20Letter%20to%20HDC.pdf
- 6) Critical Root Zone graphic: Department of Natural Resources, Washington State, 2014. <https://dnrtreelink.wordpress.com/2014/06/11/timely-tree-tips-tree-protection-part-2-critical-root-zones/>