



**Revised 05/13/2026**

**SR-2 – STAFF ADVISORY REPORT (05-08-2026)**

*This advisory report, prepared by staff, represents the opinion and advice of professional staff, and does not represent nor direct the separate review and decision of the Historic District Commission. This report serves as an addendum to SR-1, an objective staff summary of the proposal and property.*

**ADDRESS:** 470 MARTIN LUTHER KING JR. BOULEVARD

**MEETING DATE:** 05-13-2026

**APPLICATION NUMBER:** HDC2026-00162

**SCOPE:** REPLACE WOOD WINDOWS WITH ALUMINUM WINDOWS, BUILD RETAINING WALLS/INSTALL FENCING, INSTALLATION OF CMU BLOCK IN BUILDING’S EXTERIOR WALLS, (WORK STARTED WITHOUT APPROVAL)

**ADVISORY STAFF REPORT PREPARED BY:** A. DYE

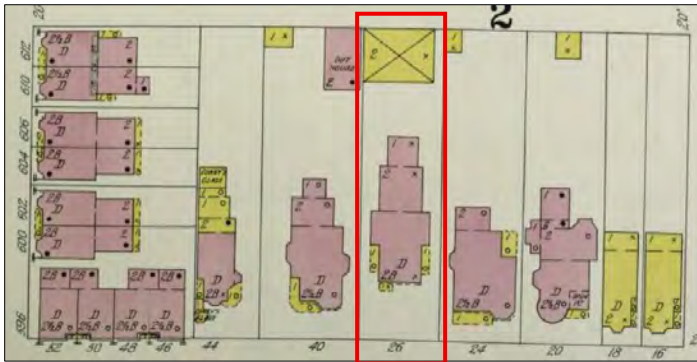
**STAFF OBJECTIONS TO APPROVAL:**

*This first section describes itemized conclusions/concerns, which, in staff’s professional opinion, would prevent the issue of an unconditional Certificate of Appropriateness (COA). “None” means staff has no objections and believes a COA is warranted, with no conditions. The Historic District Commission is not required to accept staff opinions or recommendations.*

1. The original wood windows and brickmold, and exterior brick on all walls (variegated reddish-brown brick on outward facing walls and yellowish-white brick on interior courtyard/lightwell walls) were distinctive, historic character-defining features that date to the resource’s Period of Significance.
2. The removal of the historic windows, and brick wall surface was completed without demonstration that the distinctive, character-defining components and materials were beyond reasonable repair.
3. Furthermore, the installation of aluminum windows with grilles between the glass, **minimal, flat-surface exterior applied grilles**, differing glass patterns and, at times window operation, that do not match the historic windows; and the use of CMU block as an exterior wall and retaining wall material; altered the features and spaces that characterize this property and changed the visual and historical relationship between the building and the other historic structures within the district.

**STAFF ANALYSIS AND DISCUSSION:**

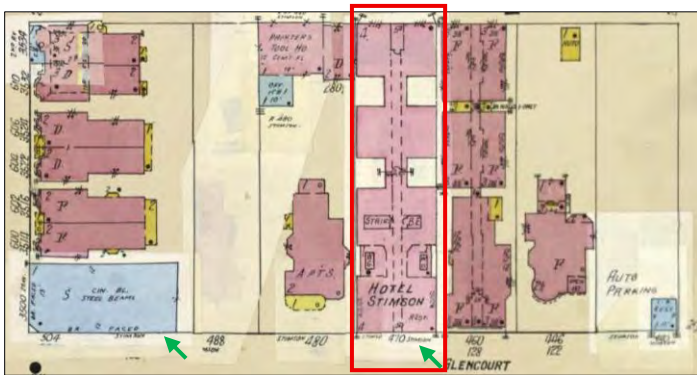
*This second section expands on the reasoning and analysis leading to staff's conclusions given in the first section above. The Historic District Commission is not required to accept staff opinions or recommendations.*



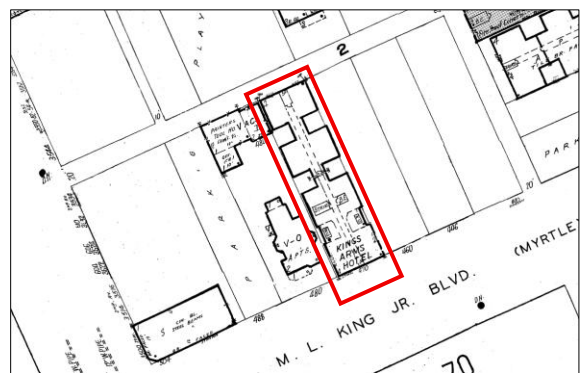
Vol. 2, 1897 – all structures on the block are single family dwellings. (subject property in red)

Sanborn  
Maps

Vol. 2, 1921 – all structures remain residential, but one large apartment building has been erected, and four attached dwellings are now rooming houses (green arrows)



Vol. 2, 1921 – 1950 – additional demolition of houses has begun, and one large commercial building and Hotel Stimson (subject property) have been erected. (green arrows).



1997 – Most buildings on the block have been demolished, with exception of one mid-1800s house, King's Arms Hotel (former Hotel Stimson), and the corner commercial property.

- The population rise and fall of this north-side block of MLK Jr. Boulevard (historic name on Sanborn maps: Stimson; most recent historic name: Myrtle) between Cass and Second is clearly illustrated on the Sanborn maps spanning 100 years.
- Hotel Stimson, now King's Arms Hotel, was erected in 1926. Thirty years later the city identified the building to have 116 sleeping rooms, one restaurant (southeast corner of building) and one beauty shop.
- At the time of the Willis-Selden local historic district designation, the façade's parapet ornament remained intact, but 13 of the 24 façade window openings on the 2<sup>nd</sup> – 4<sup>th</sup> floors had at least one sash (upper or lower) holding undivided replacement glass (two windows had

|         |                 |              |
|---------|-----------------|--------------|
| 470     | Stimson         | 21           |
| 11899   | 6-30-26         | LOT NO. DATE |
| USE     | Hotel           |              |
| CONS.   | Brick           |              |
| REMARKS | C. of Comp # 31 |              |
|         | Louis Mark      | O. K. 3/2/87 |
|         | \$120,000       |              |

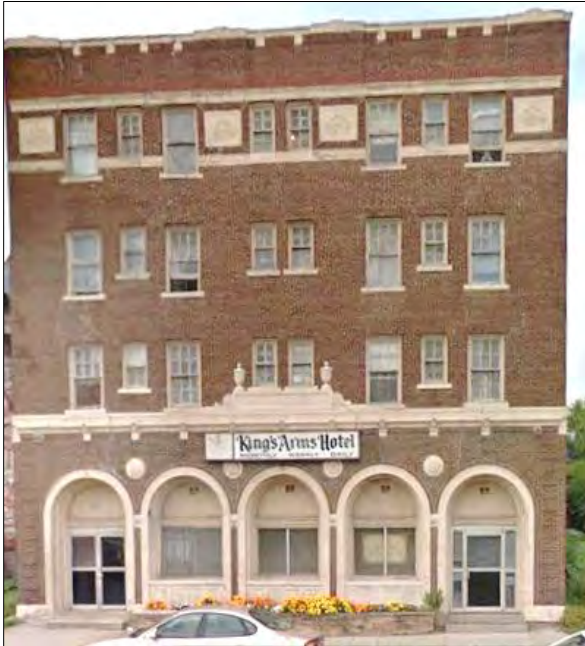
BSEED building permit cards.

|   |         |    |
|---|---------|----|
| 470   | Stimson | 21 |
| Certif. of Zoning #75   |         |    |
| Issued 12/3/56  |         |    |
| hotel-116 sleeping rooms<br>one restaurant and one<br>beauty shop. conforms to<br>requirements of building<br>and zoning ordinances as<br>an exist-hotel. |         |    |
| Ben B Fenton<br>16591<br>Meyers Detroit 35  |         |    |

Form C of D-38-C

replacement glass in the upper and lower sash). At the first floor, one of three large openings retained historic-age wood divided-light double casement windows.

- By November 2024 (last street view image available), the cast stone at the parapet has crumbled and is mostly missing, and the number of window openings that had at least one sash of undivided replacement glass increased to 16 (from 13), with six windows (increased from two) having undivided glass in the upper and lower sash. This increased change of glass occurred after district designation and without HDC review/approval. However, it is important to note that the wood sash, frames and wood brickmould remained intact within every opening on the façade, apart from half-circle windows and two first floor window openings where only the brickmold appears to remain intact.



October 2011



September 2023

Google street view



Google Streetview, October 2011. West wall of King's Arms. The adjacent ca. 1870s house was demolished by 2017; the four bays/three lightwells of the subject building are now fully visible and accessible.



Google Streetview, October 2011. East wall of King's Arms. The four bays are visible due to earlier demolitions of adjacent buildings. You can see the chain link fencing enclosing the central and rear courtyards/lightwells.

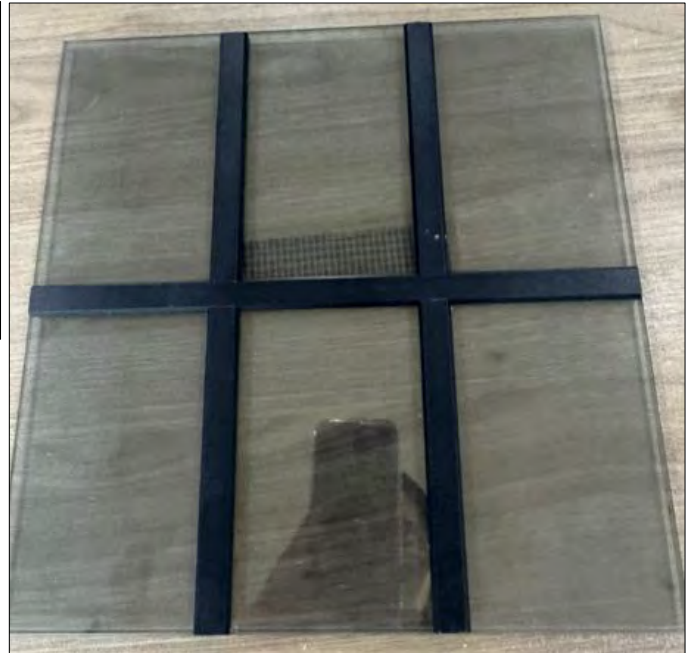
- While the dominant historic window pattern on the façade encompassed double-hung windows with a 6-over-6 or 4-over-4 divided light pattern, the side and rear windows were 1-over-1 wood double-hung windows with wood brickmold.

### Window Replacement – Façade

- Within the past six weeks, most windows on the façade (2<sup>nd</sup> – 4<sup>th</sup> floors) and side and rear walls (basement – 4<sup>th</sup> floors) have been replaced with aluminum double-hung windows with a 6-over-6 or 4-over-4 glass pattern with between-the-glass grilles. The wood brickmold was also replaced with a narrow aluminum product.
- According to the applicant’s submitted materials, replacement windows for the façade’s three first floor window openings are black aluminum fixed units: half-round for the upper openings and a single unit in each of the three large openings below. A recent applicant communication said the wood brickmold will remain in place.
- Additionally, the applicant proposes installing flat grilles to the exterior panes of glass to match the internal grille pattern. The application does not state how the grilles will be affixed (i.e., glue?), and staff is concerned about the long-term durability, and maintenance requirements, to keep these grilles in place after continued exposure to the elements. Photo comparison of proposed grilles and historic muntins are on the following page.



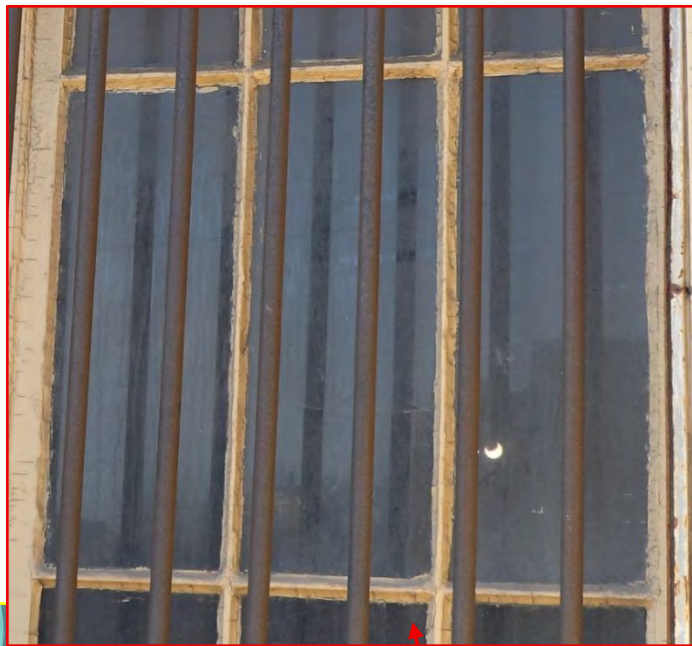
Staff photo, taken on 04/22/2026, shows the replacement of the 2<sup>nd</sup> – 4<sup>th</sup> floor windows is complete. The remaining intact historic-age double casement at the first floor is clearly visible.



*Above and right: Applicant provided photos, showing the width and profile of the grilles that are to be applied on-site to the exterior panes of glass.*

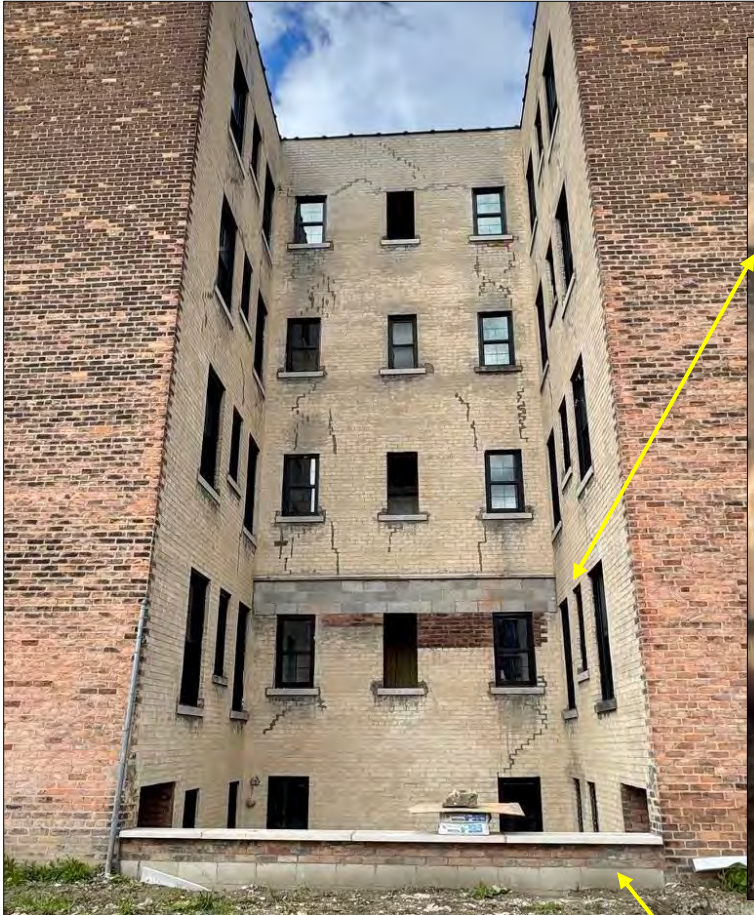
*Below and below right: Staff photos, 04/22/2026.*

- Even though this product may be applied to the exterior, it appears to extend from the glass surface about 1/8-of-an-inch and is flat surfaced.
- Pages 11 & 12 from applicant document "Compiled Submittal red" states depths for the grilles at .15" and .45" for different windows. Staff isn't clear why different dimensions are listed; the above sample is likely for the .15" grille.
- The full glass photo also shows a tint which reduces transparency and contrast between the grilles and glass. Staff isn't clear if this glass matches the glass used within the new windows.
- There is one window remaining at the façade that offers clarity on the profile/ dimensionality of a historic muntin and is likely identical to what was in place within the façade's historic-age double-hung windows. The angled surface and almost pointed outer edge of the historic muntins offers an entirely different expression than the almost flat proposed grilles.



**Side Walls – Window Replacement, Exterior Wall Alteration, Retaining Walls and Fencing**

- Using the east wall’s central courtyard/lightwell as an example of work that has been completed in the remaining lightwells: replacement windows fill most of the openings, a portion of an exterior wall was rebuilt using CMU, and a CMU and brick retaining walls topped with cast stone were erected.



*Top and above: East wall, central bay/lightwell. Replacement windows fill most openings. CMU block was installed below a cast stone band on the outward-facing wall. Staff also notes dark colored tuckpointing and use of reclaimed brick below the CMU. A CMU and brick retaining wall, topped with cast stone has been built at five of the six lightwell openings. Staff photo, 04/30/2026*

*Undated applicant photo of the east side central lightwell prior to work taking place. The brick that was replaced with CMU is visible, as is the chain link fencing that previously enclosed these recessed openings.*

**Exterior Wall Alteration**

- The discolored brick condition of the interior wall was consistent at each identical wall location; however, close photos of this brick surface were not submitted to allow the Commission to assess the condition and reason for the discoloration. The applicant states this area of brick was “surface coated in mortar and not salvageable”. Additional full wall photos

of the outward-facing walls of the lightwells can be viewed in the applicant's document "*Window Condition Status Report\_470MLK*".

- The historic brickwork pattern used to construct this *apparent* load-bearing wall, common (i.e., American) bond with 6 courses of stretchers divided by a single course of headers, was not reproduced or preserved by the CMU infill. The distinctive and historic brickwork pattern was a character-defining feature.
- The applicant states CMU block was used "for durability"; however, new brick (matching all details of the historic brick, including color) is the correct historic preservation treatment, including the area where red reclaimed brick was used. New brick is generally harder and has a higher compressive strength than early 20<sup>th</sup> century brick due to the use of higher kiln temperatures. Therefore, the new bricks would be denser and less porous than the previous bricks. Using lime mortar (matching the historic mortar) would absorb the surface water more quickly, possibly requiring tuckpointing or repointing more regularly, but new yellow brick would retain a consistent wall cladding and blend into the historic building design, while retaining the historic character of the element.
- The lightwells enclosing walls are clad in yellowish-white brick and **may have** a painted surface in some areas; a light-colored mortar is used on all exterior wall surfaces. Painting a wall surface, as indicated in the applicant's proposal which lists "painting the entire area" where the CMU and reclaimed brick was installed, is not an appropriate or compatible solution. Painting, **or potentially applying another paint layer to**, the entire wall surface would **further diminish ~~remove~~** the breathability of the historic brick and mortar, ultimately creating a moisture condition for the entire wall that could cause greater structural problems and spalling of brick. Furthermore, only painting the area where the incompatible work has occurred, will also not create a "match" to the historic light-colored brick wall surface and dimensional pattern of the historic brick.
- **A number of National Park Service briefs discuss historic masonry materials and wall surfaces (in lieu of applying an additional layer of paint):** [#1-Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings](#); [#2-Repointing Mortar Joins in Historic Masonry Buildings](#); [#6-Dangers of Abrasive Cleaning to Historic Buildings](#); [#38-Removal of Graffiti from Historic Masonry](#); [#39-Holding the Line: controlling Unwanted Moisture in Historic Buildings](#); [#47-Maintaining the Exterior of Small and Medium Size Historic Buildings](#).



*Historic-age Detroit building exhibiting paint slowly destroying the brick wall through spalling and moisture retention.*

- This contrasting brick was joined to the outer wall's red brick with a course-by-course staggered brick pattern, creating a distinctive feature of the building. Painting the interior courtyard/lightwell wall surfaces would also likely cause the loss of this feature.



*The stepped brick pattern occurs at the interior edge of each corner of the courtyards/lightwells (east and west sides). Staff photo, 04/22/2026.*

## Windows

- The wood windows were a distinctive character-defining feature. The façade windows offered ornamentation befitting its primary elevation through divided-light glass in the upper and lower sash, while the side and rear windows, with a 1-over-1 pattern, were a secondary but still significant feature, offering a hierarchy of design for the building which is further reflected on the differing masonry colors for the visible and less visible walls culminating with the decorative brick transition at the outer wall corners.



*Above: Condition of façade windows, November 2024. Google Streetview.*

*Above and below right: Undated applicant photos of one side (top) and rear (bottom) walls, prior to the window replacement beginning.*

- The applicant stated in the “*Window Condition Status Report*” that “The building has 261 wood frame single pane windows. 212 of those are not operable. The remaining 49 are missing glass or destroyed.” Staff notes this is the building owner’s assessment and is not from an experienced window repair company. Also, “not operable” does not immediately equate to “deteriorated beyond repair” as individual parts for wood window repair are readily available for purchase. The photos within the status report show all the window openings appear to have full-frame windows present (even if some of the historic divided-light glass on the façade, as stated earlier, had been replaced with clear, undivided glass). The only openings that were and remain covered, and possibly absent of windows, are the half-circle window openings and two large openings at the façade’s first floor.

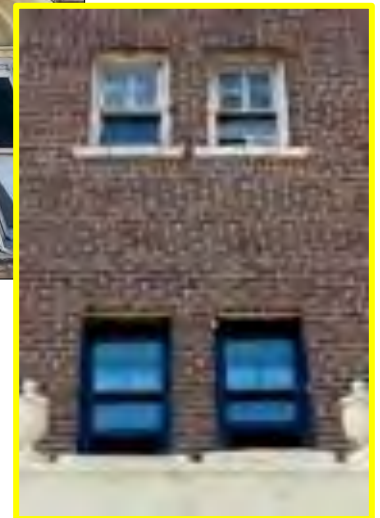


- The replacement of the building’s windows was noticed in early April and continued later in the month after BSEED had issued a stop work order. Now, only a few original wood windows remain.
- It is staff’s opinion that the windows did not appear to be deteriorated beyond repair. The undivided glass on the façade removed without HDC approval between time of district designation and May 2026 could have been replaced with fabricated true-divided light sash.



*Condition of façade, April 9, 2026. Staff photo.*

*Bottom right: Applicant supplied photo of the manufacturer’s window product.*



- Although the expansion of a portion of the above photo is a bit blurry, the difference between the historic and new windows remains quite evident. The dimensionality of the historic divided-lights has been lost and the flatness of the new window frames and loss of dimensional brickmold creates a heavy, thick appearance to the new windows. **Even with an applied exterior grille it is wide and flat, unlike the dimensional quality of the historic muntin, and the** contrast between the dark brick and black window frames causes the window openings to look like dark holes in the wall, rather than an integral component of the wall.
- The applicant submitted a measurement comparison in the “*Compiled Submittal Red*” document, and it states there is no visible difference in sash dimensions. However, the photo comparisons on this and the following page attest to a noticeable change in appearance due to the profiled dimensional loss.





*Staff photos of wood and replacement windows on the east side, central courtyard/lightwell. The dimensionality of the historic brickmold is visible, in comparison to the flat, thin trim installed against the replacement window. The importance of wood brickmold is clear: the window retains a highly dimensional appearance (even with a 1-over-1 pattern) in comparison with the 6-over-6 internal grid replacement window. 04/22/2026*



- The above photos show that traditional lime mortar was likely not used to repair areas of the interior courtyard/lightwell walls. It also appears some portions of the wall has been previously painted, but the flaking paint reveals the original brick color to be a similar light color.

### Retaining Walls and Fencing

- Regarding the CMU blocks used for many of the retaining walls, the applicant stated they will be raising the grade around the building and the CMU will not be visible.
- However, staff's analysis of the five completed retaining walls shows the east and west retaining walls were constructed differently from each other: the three walls at the west side lightwells are composed of 4-6 courses of brick, whereas the east side lightwells have three courses of brick and CMU block. Therefore, staff is concerned that one or more rows of CMU may be visible on the east side when the grade for the lot is leveled.



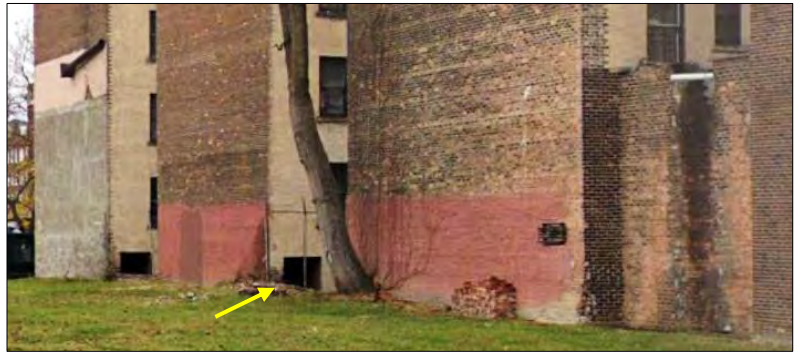
*Full west side of building. Staff photo, 04/30/2026.*



*At this historic enclosure spanning the front two bays, the historic age concrete retaining wall/foundation remained in place during staff's first site visit. Staff photo, 04/22/2026.*



Full west side of building.  
Staff photo, 04/30/2026.



View of previous low height retaining wall/chain link fence.  
Google Streetview, 11/2024



Central lightwell. The new retaining wall is clad with at least four courses of brick. Staff photo, 04/22/2026.





*Full west side of building. Staff photo, 04/30/2026.*



*View of previous retaining wall/fence condition - it appears that the fence was no longer in place at this rear location. Google Streetview, 11/2024.*



*Rear lightwell. The new retaining wall is clad with five-to-six courses of brick. Current grade is substantiated by the remaining grass at the base of the outer building walls. Staff photo, 04/22/2026.*





*Top right: View of east side of building. Staff photo, 04/30/2026.*  
*Top: Retaining wall at front lightwell, between the front and center-front bays.*  
*Middle: Retaining wall at center lightwell.*  
*Bottom: Retaining wall at rear lightwell. Staff photos, 04/22/2026.*

- In the close-up photos of the five retaining walls (evident by the remaining weeds in the mostly undisturbed surrounding ground visible in the photo on page 12 and the middle photo on this page), the current ground surface appears to be below the top three courses of brick.

- Due to the below-grade basement level courtyard/lightwell, the erection of a fence to eliminate the chance of someone falling must be addressed. Staff does not consider the previous chain link fencing to be a character-defining feature. The construction of a low retaining wall, clad with red brick to match the building's outer walls, as well as the integration of a stable, wide horizontal top surface (such as cast stone) on which to affix a railing is a compatible new feature at these side elevations.
- The railing proposed at the outer edge of the cast stone consists of black rails and spans of clear glass. The applicant supplied the mock-up (staff confirmed at a 5/7 site visit that no installation has taken place) of the proposed railing system, offering a mostly unobstructed view into and out of the lightwell. The finished height is 36"; the materiality of the fencing has not been submitted (appears to be metal).
- Staff generally supports the applicant's proposal to erect low masonry retaining walls (which are higher than the historic condition) and a mostly transparent railing, as it would be a materially and architecturally compatible solution to address safety concerns while keeping the lightwell mostly open (rather than installing tall privacy fences or masonry walls), closely matching the historic condition.
- The use of CMU block on these walls, however, is not compatible material for use at a historic location spanning the walls of an early 20<sup>th</sup> century building.



*Above and below: Undated applicant photos. Below is an interior wall view of a newly constructed wall, extending into a retaining wall of a lightwell prior to the installation of cast stone.*

### **Gutters and Downspouts**

- During staff's review of this application, it is noted that bright white gutters and downspouts have started to be installed (visible in photos on pages 10 – 13). Staff has invited the applicant to include this work item within the application.
- It is staff's opinion that the bright white color is not a compatible nor appropriate color for use on this 20<sup>th</sup> century building, and additionally, does not coordinate with the yellowish-white and dark red brick walls.



## Front Entry Doors

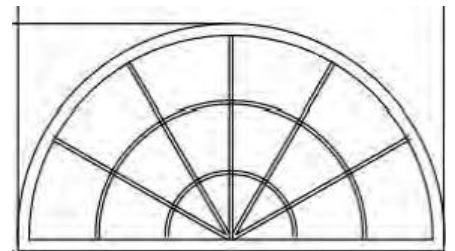
- Currently aluminum storm doors (one with partially missing Jalousie sidelights) fill the building’s outer door openings.



Above: Staff photos of façade and west and east existing exterior entrance doors

Right: Applicant drawings for half-round transom window openings and outer door openings.

- The applicant proposes, as part of the window replacement, to install half-round, between-the-glass grid, aluminum windows in the arched openings (5) that span the façade’s first floor. The aluminum doors (likely installed ca. 1950-1970) will be replaced with an ornate double door (material not noted in applicant documents) with a black finish.
- The adjacent drawings were copied from the applicant’s document “*Compiled Submittal Red*”.
- It is staff’s opinion the ornately designed doors are not appropriate for the Colonial Revival style building as the doors would impart a level of detail not found on the building. The arched windows above each door/window opening at the first floor is a historic component and should not be mimicked in any other opening. The highly decorative, dimensional doors would become focal points, rather than compatible elements deferring to the authentic historic character of the building.



**Work at adjacent property (440 – 460 MLK Jr. Blvd)**

- Staff conducted a site visit on Wednesday, 5/6; construction fencing had been installed around the adjacent lot and site preparation was well underway.
- The Commission conducted an advisory review for the proposed development at 440-460 MLK Jr. Blvd. at the 12/9/2020 meeting. The building permit (BLD2025-00031) was issued in 10/2025.

CITY OF DETROIT  
HISTORIC DISTRICT COMMISSION

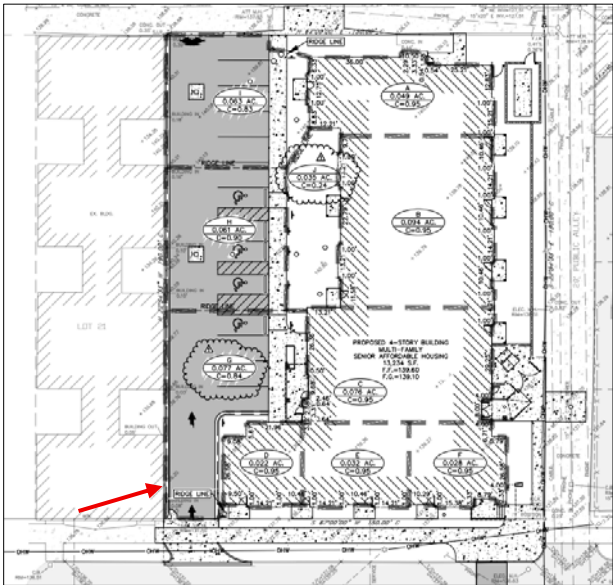
2 WOODWARD, SUITE 808  
DETROIT, MICHIGAN 48226  
PHONE: 313-224-6536  
FAX: 313-224-1310

**REPORT TO MAYOR DUGGAN  
AND  
THE HONORABLE DETROIT CITY COUNCIL**

**REGARDING THE PROPOSED  
PHYSICAL DEVELOPMENT PROJECT  
AT 440 MARTIN LUTHER KING, JR. DRIVE  
ADJACENT TO THE WILLIS-SELDEN AND  
CASS-DAVENPORT HISTORIC DISTRICTS  
DECEMBER 9, 2020**

Pursuant to Section 21-2-5 of the 2019 Detroit City Code, "Effects of projects on districts," the Detroit Historic District Commission, at their regular meeting on Wednesday, December 9, 2020, completed an advisory review for a proposed project referred to it by the Housing and Revitalization Department. The project, located at 440 Martin Luther King, Jr., includes the erection of a new multi-family apartment building.

The Detroit Historic District Commission has determined that the proposed development will have a demonstrable effect on the historic districts, and that effect will be beneficial.



Drainage map, showing outline of new building and surface parking that will abut 470 MLK Jr. Blvd. that is outlined in gray.



Looking north from MLK Jr. Blvd. sidewalk. East walls of 470 MLK Jr. Blvd at far left.

- Staff's [2020 Advisory Report](#) stated: *Erection of a 4-story, 45' tall multi-family apartment building. The main mass of the building will be oriented towards the corner of the east alley and MLK, Jr. Blvd, with the primary façade along the Boulevard. A parking lot is proposed for the western third of the parcel, immediately adjacent to the King's Arms, to be accessed by a curb cut from MLK, Jr. Blvd.*



Permitted south elevation drawing – façade facing MLK Jr. Blvd.

## Comprehensive analysis of historic features and proposed work items

- Regarding the removal/replacement of the historic wood windows and brickmold, and the replacement of brick with CMU on exterior walls, evidence was not submitted to support the claim the windows were beyond repair, nor did replacement components (i.e., aluminum windows and CMU replacing mortar covered brick) match the old in design, color, texture and materials, and therefore do not meet the following Standards:  
*Standard 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."*  
*Standard 5: "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved."*  
*Standard 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."*
- Willis-Selden Elements of Design that relate to this application include:  
*(7) Relationship of materials. A majority of buildings are faced with brick and feature stone or cast stone trim... Sash windows are historically wood...*  
*(8) Relationship of textures. On a majority of buildings within the district, the major textural effect is that of brick with mortar joints juxtaposed with cast stone or limestone trim. Patterned brickwork is used to create subtle detail on commercial and apartment buildings, such as spandrels and rectangular panels, and more pronounced textural interest where it exists on the upper stories of buildings...*  
*(9) Relationship of colors. Natural brick colors in shades of brown, red, and buff predominate on wall surfaces, while natural stone colors in shades of gray, red, and brown also exist...Brick apartment buildings are generally unpainted, with gray stone trim contrasting with brown or buff brickwork.*
- The new work, consisting of the retaining walls/fencing and outer entry doors, are not consistent with the materiality and design of the early 20<sup>th</sup> century building and do not meet the following Standard:  
*Standard 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.*
- The original wood windows and brickmold, and exterior brick on all walls (variegated reddish-brown brick on outward facing walls and yellowish-white brick on interior courtyard/lightwell walls) were distinctive, historic character-defining features that date to the resource's Period of Significance.
- The removal of the historic windows, and brick wall surface was completed without demonstration that the distinctive, character-defining components and materials were beyond reasonable repair.
- Furthermore, the installation of aluminum windows with grilles between the glass, **minimal, flat-surface exterior applied grilles**, differing glass patterns and, at times window operation, that do not match the historic windows; and the use of CMU block as an exterior wall and retaining wall material; altered the features and spaces that characterize this property and changed the visual and historical relationship between the building and the other historic structures within the district.

- Note that the Michigan Local Historic District, Act 169 of 1970, MCL 399.205, Section 5. (12) states the following:  
*“When work has been done upon a resource without a permit, and the Commission finds that the work does not qualify for a certificate of appropriateness, the Commission may require an owner to restore the resource to the condition the resource was in before the inappropriate work or to modify the work so that it qualifies for a certificate of appropriateness”*

*This third and final section takes staff’s itemized “objections” identified in the first section, and presents them in the form of “conditions” in support of a proposed approval recommendation or “reasons” in support of a proposed denial recommendation, in the form required by Section 21-2-78 of the City Code. The Historic District Commission is not required to accept staff opinions or recommendations.*

**Section 21-2-78, Determinations of Historic District Commission**  
**Recommendation 1 of 1, Denial**

Staff recommends that the proposed work will be inappropriate according to the Secretary of the Interior’s Standards for Rehabilitation and the Willis-Selden Historic District’s Elements of Design, specifically:

- *Standard 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.*
- *Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*
- *Standard 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.*
- *Standard 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.*

And

- Elements of Design #7,8 & 9.

For the following reasons;

- The original wood windows and brickmold, and exterior brick on all walls (variegated reddish-brown brick on outward facing walls and yellowish-white brick on interior courtyard/lightwell walls) were distinctive, historic character-defining features that date to the resource’s Period of Significance.
- The removal of the historic windows, and brick wall surface was completed without demonstration that the distinctive, character-defining components and materials were beyond reasonable repair.
- Furthermore, the installation of aluminum windows with grilles between the glass, **minimal, flat-surface exterior applied grilles**, differing glass patterns and, at times window operation,

that do not match the historic windows; and the use of CMU block as an exterior wall and retaining wall material; altered the features and spaces that characterize this property and changed the visual and historical relationship between the building and the other historic structures within the district.