PREPARED BY: G. LANDSBERG

STAFF REPORT 02-09-2022 MEETING PREPA APPLICATION NUMBER: 22-7669 ADDRESS: 1405 GRISWOLD HISTORIC DISTRICT: CAPITOL PARK APPLICANT/OWNER: CAPITOL PARK DECK LLC DATE OF PROVISIONALLY COMPLETE APPLICATION: 12-20-2021 DATE OF STAFF SITE VISIT: 01-14-2022

SCOPE: REPLACE STOREFRONT SYSTEM (WORK COMPLETED WITHOUT APPROVAL)

EXISTING CONDITIONS

The project site is a building in the Capitol Park Historic District, a reinforced concrete parking structure which replaced the Griswold Hotel in 1961. The largely undistinguished parking structure engages the streetscape at the corner through a small, glassy, double-height commercial space that is well-proportioned, splashed with light, and true to the building's mid-century heritage. A recent mural addition has added color, continuity and urban vibrancy to the remainder of the structure, appropriate to its building type, style, and setting. While the building is identified as "non-contributing" by the Historic Designation Advisory Board in their 2012 designation report for this district, the building occupies a prominent location at the north end of the park, and its distinctive commercial corner, especially, is a local landmark in the everyday sense. Alterations to this building, as evidenced by the mural design, have a substantial effect on the overall district.



Current view towards the west of 1405 Griswold, at Grand River, showing work already completed. Griswold Street Elevation shown. Staff photo, January 14, 2022.

PROJECT DESCRIPTION

Per the submitted drawings, product information, and narrative, the applicant proposes to legalize the unapproved full replacement of the existing storefront system, including doors, glass, and filler panels.

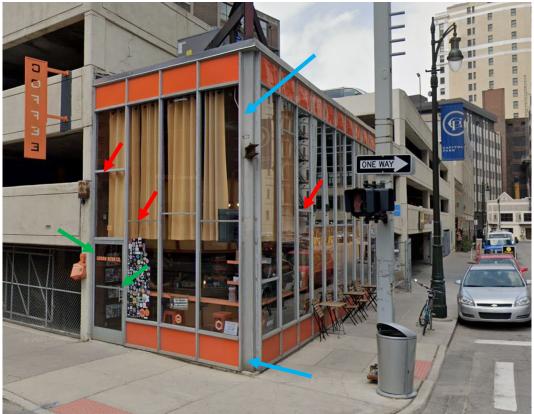


Subject parcel outlined in yellow, present day conditions per Detroit Parcel Viewer.

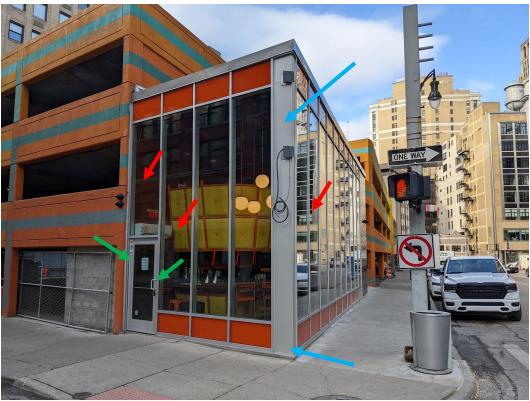
STAFF OBSERVATIONS AND RESEARCH

- The Capitol Park Historic District was established in 2012. The subject site was until 1961 the setting for the storied Griswold Hotel.
- It is staff's opinion that the small corner commercial space, executed in a stridently mid-century modern "glass box" expression, is a character-defining feature of the building that contributes to the historic character of the Capitol Park Historic District. Prior to the applicant's work undertaken without approval, this element retained its original historic fabric, or integrity.
- The application suggests that the goal of the work, in addition to mitigating water infiltration problems, was to create a "1 for 1" or matching reproduction of the original expression. However, the as-built work differs from the original design in several ways, listed here in order of importance as to their effect on the original design, in staff's opinion:
 - Delicate horizontal framing members previously dividing the columns of glass in varying
 patterns, and contributing a certain looseness to the overall expression, are now missing. In the
 shop drawings depicting the existing conditions, these are described as "random horizontal
 aluminum extrusions ½"-1" wide." Staff has identified that thirteen (13) of these are missing;
 four (4) at the Grand River side and nine (9) at the Griswold side, affecting nearly every
 "column" of glass. See red arrows on photos, showing 3 of 13.
 - 2. The vertical mullion element at the intersection of the Griswold and Grand River elevations, at the corner, is now substantially wider, flattened out and bulky, whereas the original was recessed with complex geometry, showing additional vertical detail/shadow lines, and balanced between the Grand River and Griswold Elevations. The element is now heavily "weighted" towards the Grand River side. See blue arrows on photos.
 - 3. The doors are set not into the plane of the storefront system, but markedly recessed when compared to the original planar expression. See green arrows on photos.
 - 4. The door stiles at the top/sides (the aluminum members forming the door) are bulkier (wider) than the originals

- 5. The door handles are standard, off-the-shelf commercial handles with no resemblance to either originals or appropriate mid-century precedents.
- 6. The upper structural sign mount has been relocated from the roof to the vertical corner mullion.
- 7. The new system's mullions are deeper than the originals (6" compared to approximately 4" previously).
- 8. The visible coping band at the top of the building is wider (thicker) than the original, presumably to terminate the new roofing.
- Staff notes that a separate recent application at this address, for super-signage along the Griswold elevation, was reviewed and denied by this Commission in September 2021. The storefront replacement work undertaken without permit appears to have occurred during the same late-summer timeframe. Since the application for the far less intensive sign work was properly submitted to the Commission for review, it is unclear why the far more intensive replacement of the glass box was executed or allowed by the property owner without review nor approval.
- The applicant has submitted a letter from BlackBerry Systems, which bills itself as a window restoration contractor but also sells new window systems. The letter makes statements around the original storefront system's condition, stating that "we inspected the existing aluminum storefront glazing system." However, as the letter is dated early January, 2022, it is not clear when or how the analysis was completed as the system is no longer extant. If BlackBerry was consulted before the work was completed (i.e., last summer), staff is even more concerned about why the work was then executed without HDC review and approval. The letter makes the following statements (shown in italics), which are followed by staff analysis:
 - The existing system is a non-thermally broken Kawneer Curtain Wall System, dating back to the 1960's. This was a clear anodized tubular system and the structural engineering at that time would no longer be acceptable to industry standards today.
 - HDC Staff Response: This is correct. However, it is also evident that most if not all of the historic elements on buildings protected by this Commission are not up to contemporary standards, and there is substantial deference in the Rehab Code for preservation of such elements as part of historically-protected resources. Indeed, the Commission's entire existence rides on this premise.
 - The existing system has numerous areas of air and water penetration. The original glazing gaskets have shrunk and, in some cases, deteriorated and is missing.
 - HDC Staff Response: Likely true, but no specific documentary or photographic evidence has been submitted.
 - \circ This is a monolithic glazed system using ¹/₄" glass. As a result, the single panel glazing, and the lack of thermal breaks only provide an overall *R*-value of 1.0
 - HDC Staff Response: Likely true. However, there is no evidence that less destructive options (i.e., interior storm windows) were explored to mitigate thermal concerns, which are not typically allowed to override historic concerns.
 - The has been deterioration of the anchorage since [there] has been a bi-metallic reaction between the steel anchors and the aluminum framing.
 - HDC Staff Response: Likely true. However, there is no evidence that repair options were explored or costs quoted.
 - There is need for new framing components such [as] glazing covers and horizontal mullions that are missing or damaged. There are no parts available for replacement because of the age of the system..
 - HDC Staff Response: Likely true. However, there is again no evidence that repair options were explored or costs quoted. Custom manufacture of important characterdefining elements is a regular requirement for historic buildings. No costs for repair were submitted in the application.



View **BEFORE** alterations. Google Street View, August 2018.



View AFTER alterations. Staff photo, January 14, 2022.

ISSUES

- Per the analysis above, staff's main concern is that it does not appear that repair options for this character-defining feature of the building were duly and comprehensively considered in accordance with Secretary of the Interior Standards #5 and #6, which prioritize preservation/repair over replacement for features of distinctive historic character, even when they do not perform to contemporary standards. There is no apparent involvement of a licensed architect or other disinterested party who might have fully assessed the system before its destruction, and have offered less drastic solutions (new custom extrusions and seals only where necessary, for instance). As a sixty-year old modern storefront system it may be reasonable to infer that any repair of the original system would have been challenging, time-consuming, and/or expensive, but in staff's opinion not enough information has been presented that the repair of the original system should be found technically or economically "infeasible" under the reasonability standard in 36 CFR 67.7. For this reason staff cannot recommend approval to your Commission.
- As the original fabric has been lost, it is staff's opinion that the Commission should only approve an exact match, conditioned on mitigation of most of the disparities outlined above (additional horizontal members, corner mullion issue, etc., numbered 1-8). Per Standard 6, replacement elements *"shall match the old in design, color, texture, and other visual qualities and, where possible, materials."*
- There is no issue with the reroofing work, which can receive a separate administrative approval.

RECOMMENDATION

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

The proposed replacement of the original storefront glass system, including the doors and framing members therein, is incompatible with the historic character of its environment, alters features and spaces important to the historic setting, and is in conflict with the district's Elements of Design.

Staff therefore recommends that the Commission deny the proposal, as it fails to meet the Secretary of the Interior's Standards and the Capitol Park Historic District's Elements of Design, specifically Standard 2, 5, and 6:

(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.