

STAFF REPORT: 02/12/2025 MEETING

PREPARED BY: J. ROSS

ADDRESS: 264 WATSON

APPLICATION NO: HDC2024-00666

HISTORIC DISTRICT: BRUSH PARK

APPLICANT/ARCHITECT: JOHN BIGGAR/STUDIOZONE DETROIT

OWNER: ELIZABETH BRUSH

DATE OF STAFF SITE VISIT: 11/25/2024

DATE OF PROVISIONALLY COMPLETE APPLICATION: 02/01/2025

SCOPE: DEMOLISH EXISTING PORCHES, ERECT REPORT (ON REASSIGNMENT FROM APPEAL FOR HEARING OF ADDITIONAL EVIDENCE)

EXISTING CONDITIONS

The house located at 264 Watson was erected ca. 1880 as a single-family, Queen Anne style dwelling. The house features a central 2 ½-story high, hipped-roof mass with a 2 ½-story high, projecting gabled roof wing at the front. A two-story, flat-roof rear addition had been constructed by 1887. Exterior walls are primarily clad with brick that has been painted red, however wood appears in the front gable end. The building has wood, vinyl, and aluminum windows. Despite the replacement of some of the building's wood windows, the original wood brickmould appears intact throughout. A partial width wood porch, added in 2021, is located at the building's front façade. A second, historic-age, wood porch with decorative jigsawn details and turned wood posts, is located at the east side wall. A non-historic, flat-roof wood porch with a concrete block deck/floor is located at the building's rear.



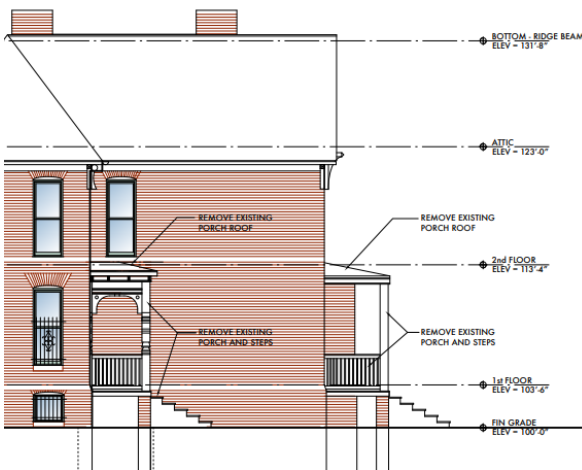
264 Watson, photo taken by staff on 11/25/2024

PROPOSAL

The applicant presented a proposal to rehabilitate the property to the Commission for review at their 12/11/2024 regular meeting. See the following link to the application webpage from the December 2024 HDC meeting which includes the information the applicant submitted to the Commission in support of their application [264 Watson \(12/11/2024\) | City of Detroit](#). Per the submitted *Historic District Commission Application for Work Approval* for the project which was dated 11/08/2024, one scope item for which the applicant was seeking the Commission’s approval was the installation of a “new wrap-around covered porch to replace the existing front and side of the house”. Specifically, per the below drawings, this scope item included the following:

- Demolish the existing non-historic porch at the front façade
- Demolish the existing historic porch at the east side/façade
- Erect a new porch which would wrap around the front and east/side facades to include:
 - A hipped roof which would be covered with asphalt shingles
 - Wood posts, trim, guardrails, handrails, and steps
 - Wood lattice skirting
 - Brick supporting piers
 - Composite floors

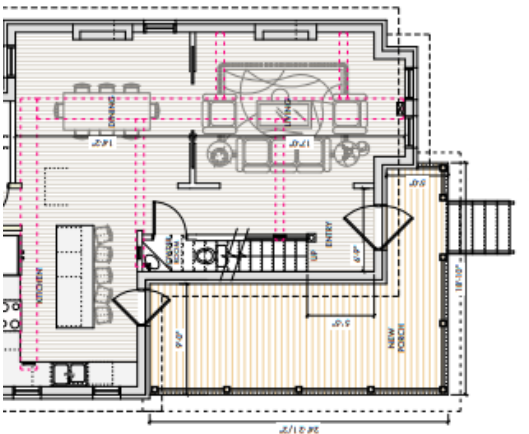
GENERAL NOTES:
1. ALL BRICK MASONRY SURFACES ARE TO BE CLEANED W/ SOAP AND WATER, LOW PRESSURE ONLY. APPLY PAINT REMOVING PRODUCT ON EXISTING PAINTED, BRICK MASONRY SURFACES TO INCREASE AMOUNT OF PAINT REMOVAL
2. APPLY PAINT REMOVER TO ALL STONE "BAND COURSES" ON THE BUILDING. POWER WASH PAINT REMOVER MATERIAL OFF AND THEN POWERWASH CLEAN.
3. THE AREAS OF DEMOLITION ARE INTENDED TO SHOW THE GENERAL AREA AND SCOPE OF THE WORK. SEE THE PROPOSED FLOOR PLANS FOR THE FINAL CONDITION TO DETERMINE THE DEMOLITION ITEMS NEEDED.



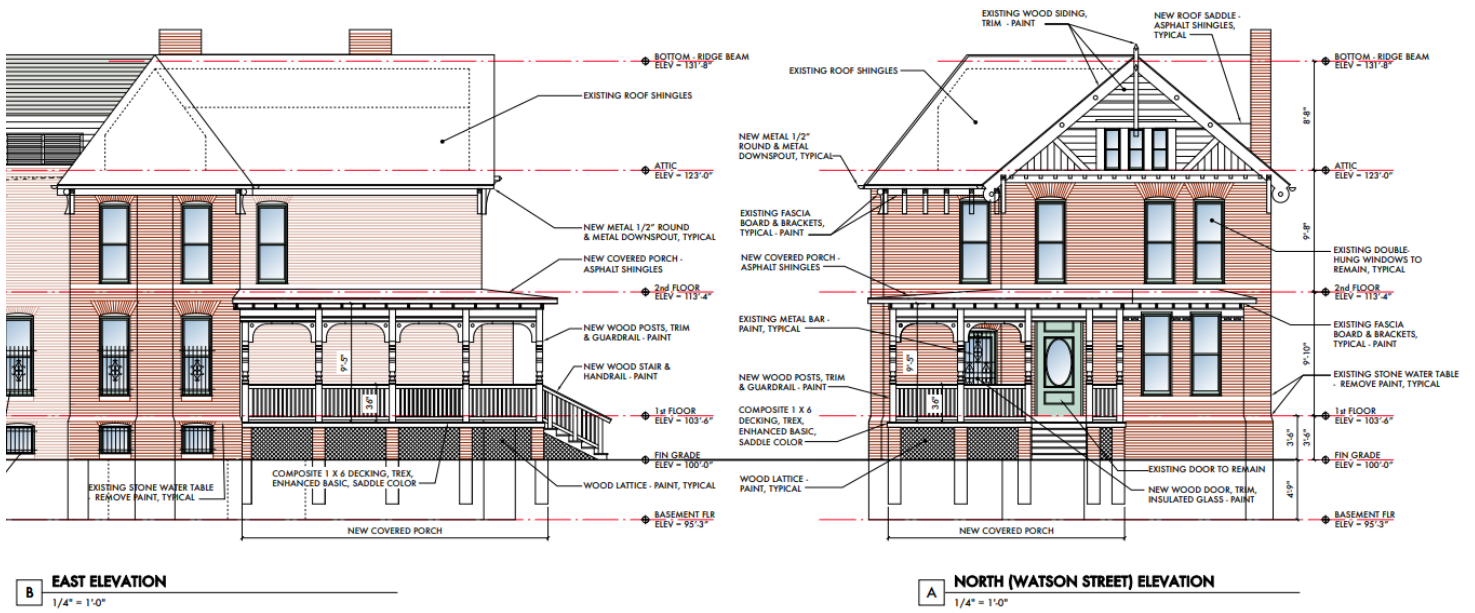
East elevation. Porch proposed for removal



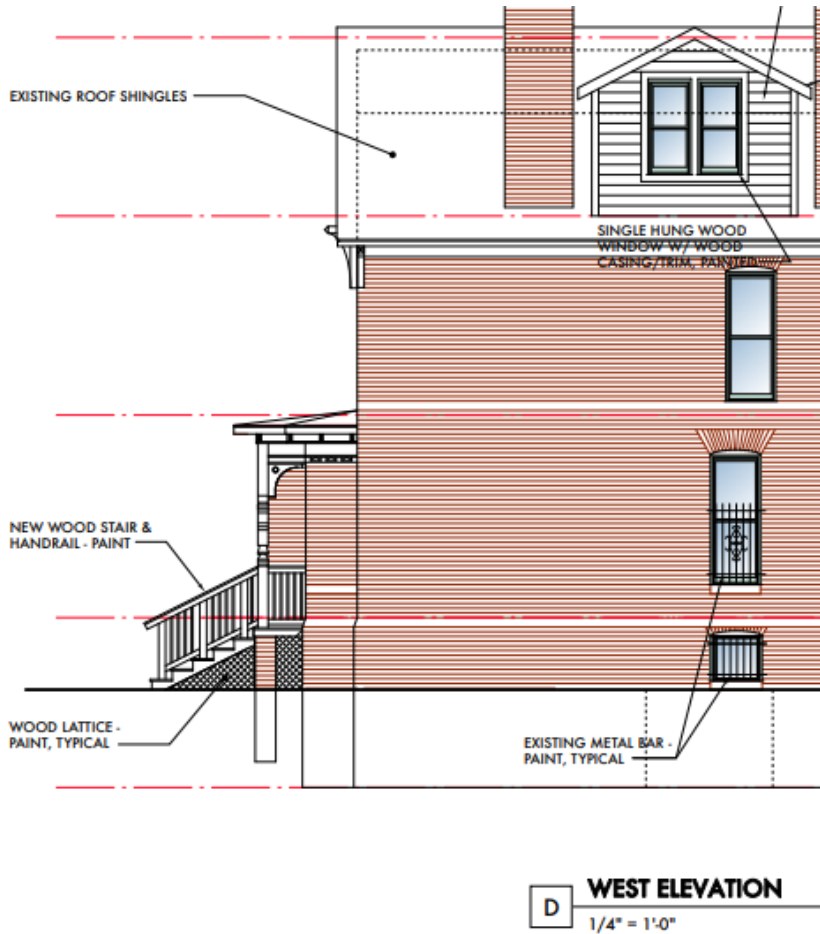
North elevation. Porch proposed for removal



Floorplan, showing proposed new wrap-around porch



Elevation drawings, showing proposed new wrap-around porch. Applicant's 12/11/2024 submission



Elevation drawing, showing front porch of proposed new wrap-around porch. Applicant's 12/11/2024 submission

Note that the applicant and the property owner attended the 12/11/2024 HDC meeting and presented testimony in support of their porch proposal. The Commission considered the applicant's submitted materials, the HDC staff report, and the applicant's and property owner's testimony and determined the following:

- The east side porch proposed for removal was a distinctive, character-defining feature of the property because it appears to date from the building's original date of construction and displays significant ornamental features which are illustrative of the building's vintage/period of construction and Queen Anne style
- The application did not provide documentation that shows that the distinctive character-defining east side porch is deteriorated beyond repair. Also, if the porch was shown to be deteriorated beyond repair the new porch the Standards require an exact replication. While the new porch appears to borrow design cues from the historic, it does not exactly replicate the existing

The Commission therefore issued the following decisions regarding the proposed new wraparound porch and the resulting demolition of the front/north and side/east façade porches:

- **Denial** for the demolition of the east side porch
- **Certificate of Appropriateness** for the demolition of the existing front porch and the erection of a new front porch with the condition that the new front porch shall only extend the width of the current front porch/shall not wrap around the east side. The final permit documents shall be revised to reflect this condition.

After their receipt of the Commission's notices of decision, the applicant filed an appeal with the State's Attorney General's Office with respect to the Commission's Denial for the demolition of the east façade, historic porch. On 01/29/2025 the applicant submitted new documentation to the hearing officer as supporting exhibits. This documentation can be accessed via the following link [24-036676_Petitioner Exhibits.pdf](#).

On 02/5/2025, HDC staff, the Commission's Vice Chair, and the Commission's legal counsel appeared in front of the Michigan Office of Administrative Hearings and Rules (MOAHR) to defend the applicant's appeal of the Commission's Denial for the removal of the historic east side porch at 264 Watson. During the course the appeal hearing, HDC staff noted that applicant's new information had not been submitted to the Commission for review and/or consideration at the 12/11/2024 meeting, despite testimony from the petitioner to the contrary. Therefore, without prejudicing the Commission's review, the judge properly directed the matter back to the Commission for review of the new evidence, consistent with the body's statutory role as the original body of jurisdiction and the Commission's Rules of Procedure for new evidence. The applicant's new documentation has therefore been submitted to the Commission for consideration regarding the proposed removal of the historic east side/façade porch and the erection of a new wrap around porch per the materials presented to the Commission at the December 2024 regular meeting. The new documents consist of the following:

- Exhibit P-1: The applicant's narrative regarding why they wish to erect a new porch per the submitted design
- Exhibit P-2: Secretary of the Interior's Standards for Rehabilitation with the applicant's comments related to the property
- Exhibit P3: The applicant's narrative on the elements of the Queen Anne style
- Exhibit P4; A condition assessment, prepared by the applicant
- Exhibit P5: Photos of historic age, Queen Ann style with wrap-around porches that are located outside of the Brush Park local historic district

Finally, please note that staff has further reviewed our records in the course of our preparation of this report and confirmed we had not received correspondence from the applicant or owner regarding this project dating from January 2024 as the petitioner stated during the appeal hearing. Rather, HDC

records indicate that the applicant first contacted HDC staff about this project in October of 2024. Also, it appears that the current owners only recently purchased the property/purchased the property well after January 2024. It is the HDC staff's conclusion that the relevant exhibit was misdated to January 2024, instead of January 2025.

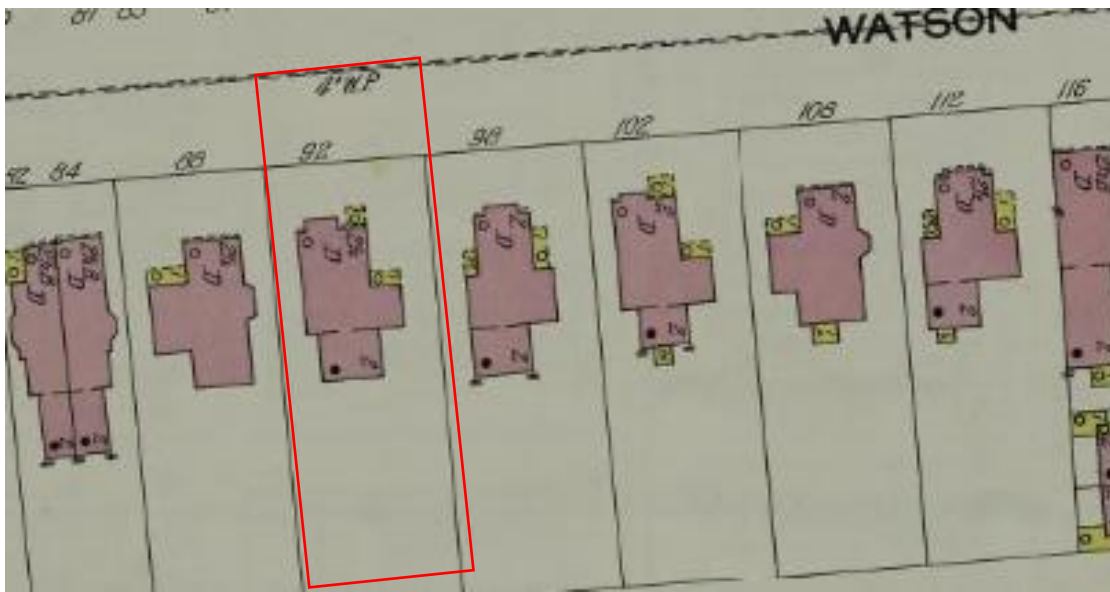
STAFF OBSERVATIONS AND RESEARCH

- **The Woodward East Historic District**, which included 264 Watson, was listed in the National Register of Historic Places (NRHP) in 1975. The National Park Service determined that 264 Watson was a Contributing property to the NRHP-listed district. Staff notes that the NRHP nomination identified the property as Contributing because the designation report for the district did not provide a list of Contributing and Noncontributing buildings.
- **The Brush Park Historic District** was locally designated in 1980 but did not identify Contributing/Noncontributing status of the properties within the district, as noted above.
- See the below photo of the house, taken in 1980 at the time of the district's local designation to note the following:
 - The east side porch which is proposed for demolition was present and appears to be of historic age/original to the date of the house's construction
 - The front porch is not of historic age

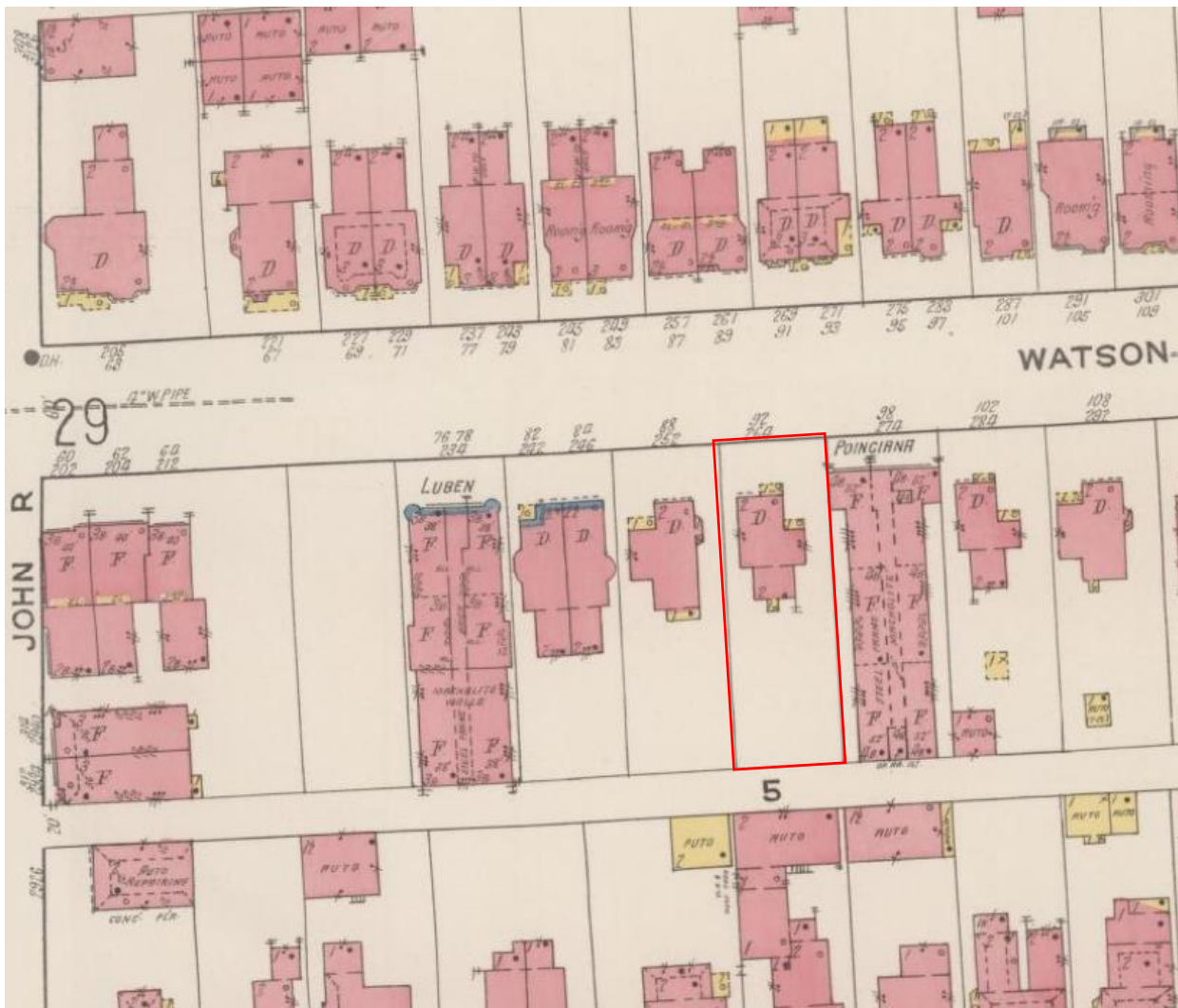


264 Watson, designation slide dating from 1980.

- The below Sanborn Maps indicate that the building had an east side and a front porch as early as 1887. This condition continues to the current day.



Sanborn Insurance Fire Map, 264 Watson, 1887. Note that the building is addressed as 92 Watson at this time



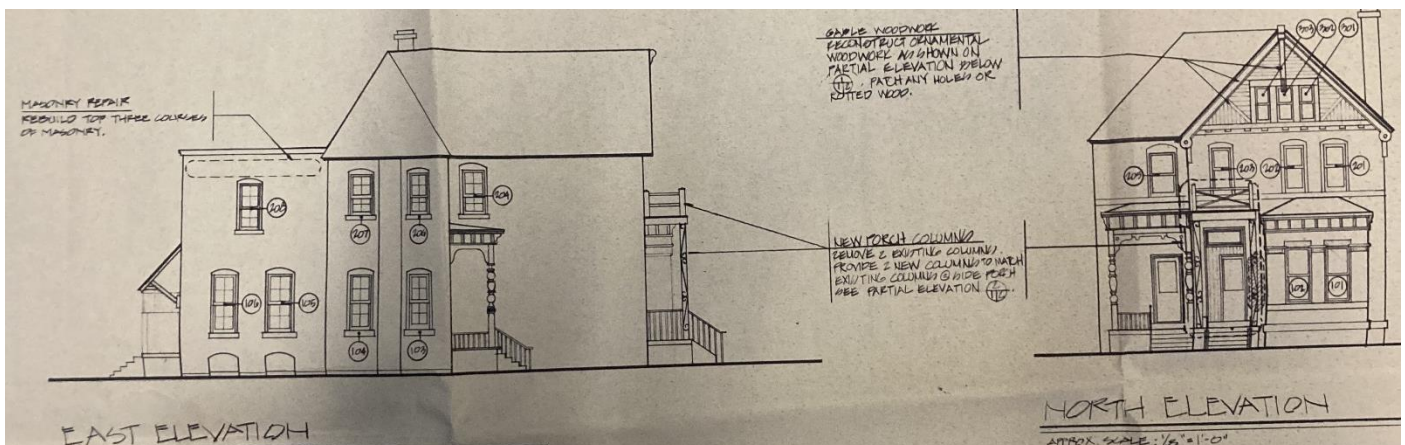
Sanborn Insurance Fire Map, 264 Watson, 192



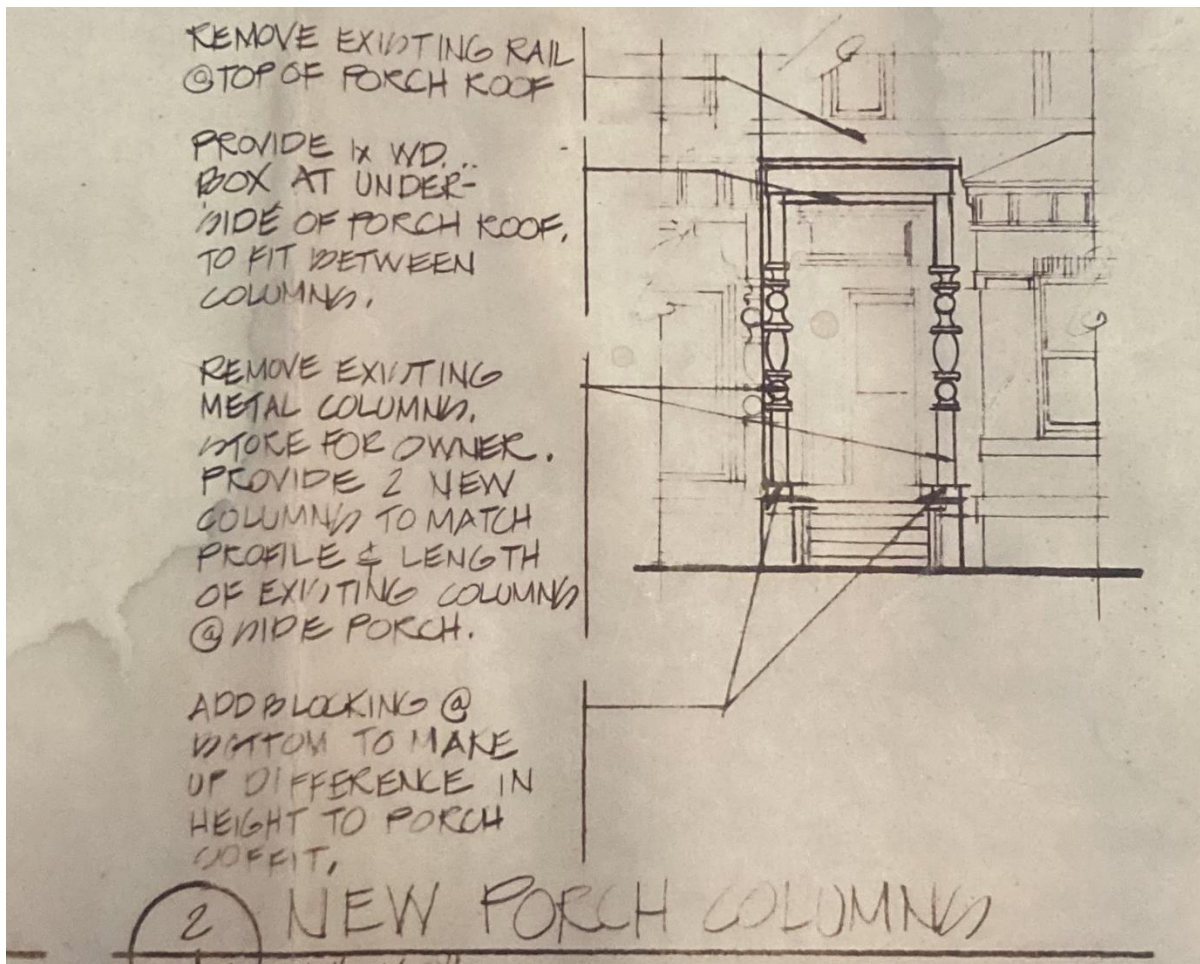
Sanborn Insurance Fire Map. 264 Watson, 1950

Front Porch

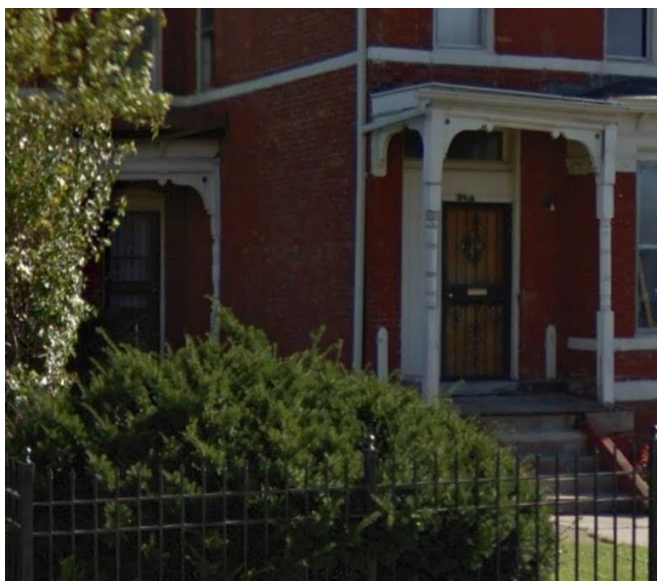
- A review of HDC records revealed that the house was rehabilitated in 1981 under a City-funded, home repair program. Exterior work items included the installation of a new asphalt shingle roof, the addition of the current ornamental woodwork/vergeboard at the front facades gable end, the addition of new columns at the front porch to match those present at the historic east side porch, and the removal of the rooftop rail at the front porch (see the below).



Rehab drawings from 1981. The front porch rehab design takes cues from the historic east side porch. Note that the side porch was not proposed for repair at time time.



Rehab drawings from 1981. The front porch rehab design takes cues from the historic east side porch.



Google Streetview image, 2011. Showing the front porch which was added in 1981



Front porch in 1980, at time of local designation, prior to the 1981 rehab

- Google Streetview images indicate that the front porch which was added in 1981 was removed sometime between 2011 and 2013, leaving the masonry deck and steps. The current front porch

was erected in 2021 (see below). The application that was submitted to the Commission in December 2024 proposed to demolish this non-historic front porch, in addition to the historic east side porch, and replace both with a single new wraparound porch with details that echoed those found at the existing historic east side porch. Staff supported the proposal to remove the existing front porch because it remained as an unapproved, incompatible replacement of an earlier porch which had been erected in 1981 to replace the non-historic front porch that was present at the time of the district's designation. However, staff did not support the removal of the historic east side porch.



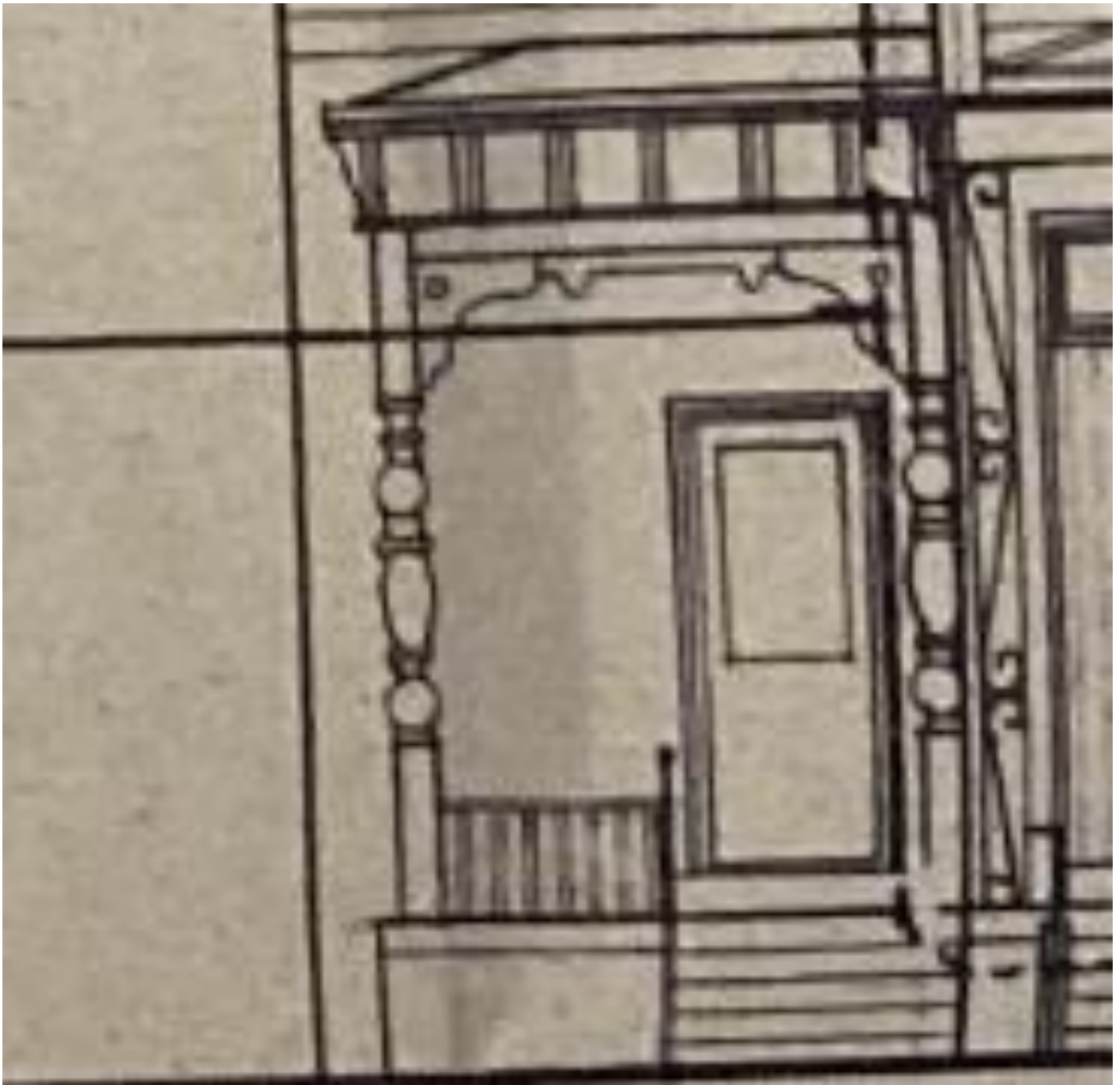
Front porch, current conditions. Photo by staff, 11/25/2024

- Staff therefore recommended that the Commission issue a Denial for the demolition of the east side porch for the following reasons:
 - It was staff's opinion that the east side porch is of historic age and remains as a distinctive character defining feature of the house
 - The 2024 application material did not provide documentation that showed that this character-defining porch was deteriorated beyond repair. However, even if the side porch was shown to be deteriorated beyond repair, the Standards require that a new/replacement be an exact replication. The proposed wraparound porch design did not provide an exact replication of the historic age, character-defining side porch
- At the December 2024 regular meeting, the Commission issued a COA for the demolition of the existing front porch and the installation of a new front porch according to the style proposed in the application **with the condition that the new front porch only extend the width of the current front porch/shall not wrap around the east side** as it would result in the demolition of east side porch which they determined to be a distinctive, character-defining feature of the building.
- Staff has now reviewed the applicant's new material/the information that was presented as evidence at the 02/05/2025 appeal hearing and maintains their opinion that the proposed porch design **does not** conform to the Secretary of the Interior Standards for Rehabilitation and the Guidelines for Rehabilitating Historic Buildings for the reasons as outlined below:

- As depicted in the above Sanborn Fire Insurance maps, the building had an east side porch of the same footprint/configuration as the existing since 1887
- **The Woodward East Historic District**, which included 264 Watson, was listed in the National Register of Historic Places (NRHP) in 1975. The National Park Service determined that 264 Watson was a Contributing property to the district.
- **The Brush Park Local Historic District** was designated in 1980, a mere five years after the neighborhood's listing in the NRHP. The above designation slide depicts 264 Watson's appearance at the time of the local designation and likely reflects the property's appearance when it was identified as a Contributing property to a NRHP designated district. Specifically, despite the non-historic primary entry infill and incompatible front porch, the building was identified as Contributing to the district as it retained its historic form, exterior materials, and decorative details which are associated with the Queen Anne style at its front gable end, east side porch, front façade bay, the roof overhang/eaves/soffit, side and rear door trim, and window surrounds/brickmould. The 1981 rehabilitation drawings (see above) also indicate that the windows were double-hung, wood units throughout.
- Since its listing in the NRHP and local historic designation, the building has undergone some alterations and deterioration. However, its historic form, exterior materials, and decorative details which are associated with the Queen Anne style at the front gable end, east side porch, front façade bay, the roof overhang/eaves/soffit, and side and rear door trim remain. Also, the house retains the majority of its historic-age wood windows, per the submitted window inventory, and the decorative historic wood window surrounds/brickmould remain intact. It is staff's opinion that the building in its current condition is Contributing to the district.
- Please see the below photos and drawing to note that the east side porch appears much as it did at the time of local designation/when the building was identified as Contributing to the historic district, despite some deterioration and repairs.



Appearance of east side porch in 1980, at time of local designation. Photo provided by HDAB



Appearance of east side porch in 1981. Source, HDC files



East side porch. Current appearance. Photo provided by applicant as new evidence



East side porch. Current appearance. Photo provided by applicant as new evidence



East side porch. Current appearance. Photo provided by applicant as new evidence



East side porch, current appearance. Note that the east side porch's decorative details match those at the front façade's bay window. Specifically, the brackets at the porch soffit/eave area match those at the front facade bay (outlined in yellow). Provided by applicant as new evidence



Front façade, current appearance. Note that the east side porch's decorative details match those at the front bay window. Specifically, the brackets at the porch soffit/eave area match those at the front facade bay (outlined in purple). Provided by applicant

- The existing side porch is a distinctive character-defining feature of the building as it displays historic-age details which are associated with the Queen Anne style and are reflective of decorative detailing elsewhere on the building. Also, as noted above, the porch has been present since 1887 and is a significant element which contributes to the overall visual character of the building. Finally, it is staff's opinion that the documentation provided by the applicant further highlights the significance of the porch's distinctive detailing and that in-kind repair is both feasible and reasonable given the porch's scale and material.
- As noted in the 12/11/2024 staff report, the proposed porch design does not meet the *Secretary of the Interior's Standards for Rehabilitation*, in particular Standards # 2, 5, 6, and 9 which state the following:
 - 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* - **FAILS because the proposed wrap around porch would result in the removal of the character-defining east side porch**
 - 5) *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.* – **FAILS because the proposed wrap around porch would result in the removal of the character-defining east side porch**
 - 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.* **FAILS because the proposed wrap around porch would result in the removal of the character-defining east side porch. Per Standard #6, the current east side porch should be retained and areas of deterioration repaired in kind. If it is adequately documented that entirety of the porch is too deteriorated to repair, then the character-defining porch must be replicated/rebuilt to match the old in design, color, texture, and other visual qualities and, where possible, materials.**
 - 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.* – **FAILS because the wrap around porch would destroy/result in the removal of the character-defining east side porch**
- Also, please note that National Park Service's *Guidelines for Rehabilitating Historic Buildings* outline the following re: the repair and replacement of Entrances and Porches:
 - Repair
 - *Recommended* - reinforcing the historic materials. Repair will also generally include the limited replacement in kind--of with compatible substitute material--of those extensively deteriorated or missing parts of repeated features where there are surviving prototypes such as balustrades, cornices, entablatures, columns, sidelights, and stairs.
 - *Not Recommended* - Replacing an entire entrance or porch when the repair of materials and limited replacement of parts are appropriate.
 - Replace

- *Recommended* - Replacing in kind and entire entrance or porch that is too deteriorated to repair--if the form and detailing are still evident--using the physical evidence as a model to reproduce the feature. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered
 - *Not recommended* - Removing an entrance or porch that is unrepairable and not replacing it; or replacing it with a new entrance or porch that does not convey the same visual appearance
- To summarize, the Commission determined that the east side porch was a distinctive, character-defining feature of the property at their 12/11/2025 regular meeting. If the Commission continues to maintain that determination after its review of the newly submitted information, per the SOI Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, the porch must be retained and repaired in kind. If the Commission determines that the applicant has adequately demonstrated that the east porch is deteriorated beyond repair, then the character-defining porch must be replicated/rebuilt to match the old in design, color, texture, and other visual qualities and, where possible, materials.
 - Finally, please note that it is staff's opinion that the proposed new porch design *would not* meet the threshold for the issuance of a Notice to Proceed (NTP). The applicant has provided evidence that the east side porch is in need of repair. Per Sec. 21-2-75 of the Detroit City Code, the Commission would be required to issue a NTP only if the body determined that the level of deterioration at the porch "constitutes a hazard to the safety of the public or the occupants" **AND** that the installation of the new porch and associated demolition of the east side porch was "**necessary** to substantially improve or correct any of these conditions." In this case, it is staff's opinion that the complete demolition of the porch is not necessary to address any potential hazard. Rather, any such hazard can be addressed by repairing the porch as it appears to be both technically feasible and reasonable to do so.

ISSUES

Staff recommends that the Commission issue a Denial for the project as proposed for the following reasons:

- The east side porch proposed for removal is a distinctive, character-defining feature of the property because it appears to date from the building's original date of construction and displays significant ornamental features which are illustrative of the building's vintage/period of construction and Queen Anne style.
- The application does not provide documentation that shows that the distinctive character-defining east side porch is deteriorated beyond repair. Also, if the porch was shown to be deteriorated beyond repair the new porch the Standards require an exact replication. While the new porch appears to borrow design cues from the historic, it does not exactly replicate the existing
- The proposed work does not meet the threshold for the issuance of a NTP

RECOMMENDATION(S)

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

Recommendation 1 of 1, Denial: Demolish existing east side porch and erect new wraparound porch

Staff recommends that the proposed work will be inappropriate according to the Secretary of the Interior's Standards for Rehabilitation and the Brush Park Historic District's Elements of Design, specifically, Standards #:

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.*
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.*

For the following reasons:

- The east side porch proposed for removal is a distinctive, character-defining feature of the property because it of historic age/appears to date from the building's original construction and displays significant ornamental features which are illustrative of the building's vintage/period of construction and Queen Anne style.
- The application does not provide documentation that shows that the distinctive character-defining east side porch is deteriorated beyond repair. Also, if the porch was shown to be deteriorated beyond repair, the Standards require an exact replication. While the new porch appears to borrow design cues from the historic, it does not exactly replicate the existing.