

STAFF REPORT FEBRUARY 12, 2025, REGULAR MEETING

PREPARED BY: T. BOSCARINO

APPLICATION NUMBER: HDC2025-00028

ADDRESS: 3020 IROQUOIS

HISTORIC DISTRICT: INDIAN VILLAGE

APPLICANT/OWNER: ROBERT A. KNAPP

ARCHITECT: ROBERT G. CLARKE, CBI DESIGN PROFESSIONALS

DATE OF PROVISIONALLY COMPLETE APPLICATION: JANUARY 21, 2025

DATE OF STAFF SITE VISITS: JANUARY 29, 2025, FEBRUARY 6, 2025

SCOPE: ERECT DWELLING

EXISTING CONDITIONS

The project site is a vacant lot on the east side of Iroquois Street between Charlevoix Street and Goethe Street. This mid-block parcel, according to city records, is 85 feet wide by 172 feet deep. Currently the subject property is a mowed lawn. Near the southwest corner of the property, two trees are closely intertwined: a slippery elm and a red mulberry (an oak tree is located on the public berm and not subject of this application). Non-historic fencing separates the property from Thomas Mollicone Park to the rear (east).

Looking east from Iroquois towards the subject property. January 2024 photo by staff.

Additional context

Immediately to the south of the subject property is 2998 Iroquois, a two-and-one-half-story, Colonial Revival house presently under construction, approved by the Historic District Commission with a Certificate of Appropriateness dated June 21, 2023. It will be the first new house in the district since 1999. To the north is 3030 Iroquois, a two-story, Colonial Revival house built in 1960. Across the street from the subject property, on the west side of this block, is a complete row of pre-war historic houses of varying designs consistent with the general fabric of the district, with an emphasis on versions of the Neo-Georgian or Colonial Revival style.



Subject property outlined in bold yellow box. Image from Detroit Parcel Viewer.



Left: 3030 Iroquois. April 2023 photo by staff. Right: 2998 Iroquois. February 2028 photo by staff. Both buildings are considered by staff to be non-contributing (non-historic).



Contextual view, looking approximately southwest from the subject property. February 2024 photo by staff.



Contextual view, looking approximately northwest from the subject property. February 2024 photo by staff.



Sanborn Map Company, 1951. Approximate location of subject property (3020 Iroquois) shown in red. Its neighbors to the north and south (3030 Iroquois, and 2998 Iroquois, respectively), also shown in red, had not yet been built at the time of this map.

PROPOSAL

The proposal is to erect a single-family dwelling in a Postmodern or New Traditional style that largely borrows from early twentieth-century precedents, especially Mediterranean and Italian Renaissance styles, with some elements from other styles (the application narrative describes it as “Twentieth Century Composite.”)



VIEW FROM STREET (SOUTH)
NO SCALE



VIEW FROM STREET (SOUTHWEST)
NO SCALE

Rendering of proposed building, from application materials.

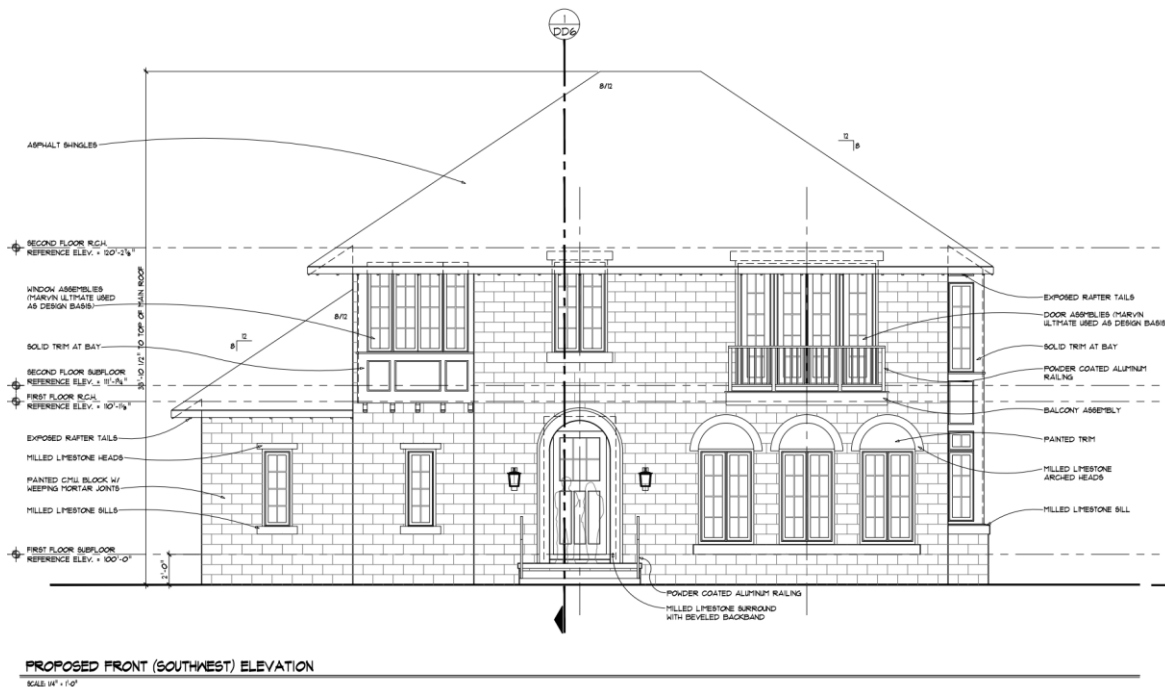
Facing west, the proposed house consists largely of a rectangular, two-story, hip-roof, primary mass. A vertical emphasis is created by its openings: a round-arched, recessed, single entrance door, and tall, relatively narrow, casement windows, including a trio of such windows occupying round-arched openings on a continuous sill on the first floor. Several features add texture and depth to the facade: a slightly recessed northern bay with a

second-floor, box-bay window supported by decorative projecting beams, a balconet spanning French windows, and projecting eaves with exposed rafters. The building would have a steeply pitched roof, with an eave height of 20 feet, 6 inches, and a ridge height of 33 feet, 10 inches.

Additional, subordinate masses add complexity to the proposed building. Most visible is a single-story, hip-roof, attached garage that extends north. Its two-bay garage door faces north; a single casement window faces the street. Less visible are a two-story, box-bay window on the south elevation, and a single-story, hip-roof mass to the rear (east). There is no front porch; the building would be accessed by two concrete steps leading to a four-foot-deep concrete landing.

The proposed exterior material would largely be painted, 8 inch by 16 inch, flush-joint concrete masonry unit (CMU). Though a novel material for Indian Village (see “Staff Observations and Research,” below), it somewhat approximates a stucco expression. The proposal also offers an alternative option of painted face brick (the appropriateness of both options is discussed below). Contrast is offered by other materials: painted wood trim, painted wood lap siding (on the rear elevation, second floor, only), and elements of Indiana limestone.

The site plan includes a straight concrete walkway leading to the front entrance, a concrete driveway with apron, foundation planting beds, backyard landscaping, and a new maple tree in the back yard. The “existing tree” in the front yard would remain (note: there are two trees, see “Issues,” below).



Elevation drawing of proposed building, from application materials.



PAINTED CMU BLOCK (COLOR MATCH TO C-4 YELLOWISH WHITE)



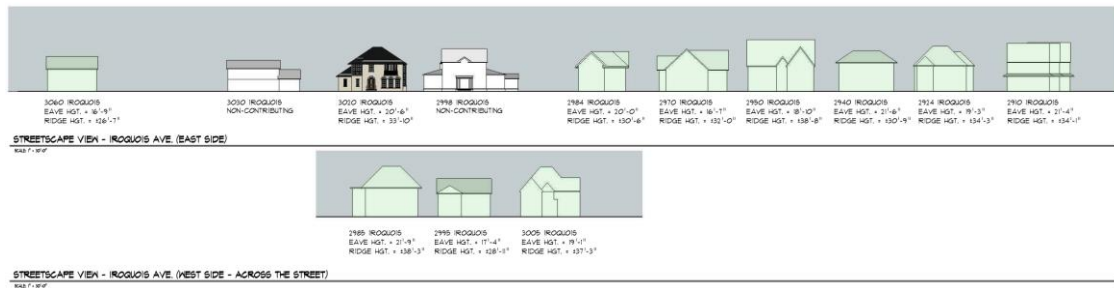
PAINTED BRICK VENEER (COLOR MATCH TO C-4 YELLOWISH WHITE)

Proposed painted CMU (left) and alternate painted brick (right). Images from application materials.

STAFF OBSERVATIONS AND RESEARCH

- The Indian Village Historic District was established by resolution of the City Council in 1971 and codified November 5, 1976. It is among the initial eight historic districts in the city for which no Final Report was prepared.
- As with all historic districts, the City Council has codified Elements of Design for the Indian Village Historic District. Per the City Code, the Historic District Commission is required to use the Elements of Design in the context of the Secretary of the Interior's Standards. Given the prescriptive nature of these Elements, staff recommends that maximum conformance to the Elements in this review should be of particular concern to the Commission.
- Regarding the Elements of Design, especially as they apply to new construction, staff interpretation has consistently been that deviation from just one or two of the Elements is acceptable, sometimes desirable, as it provides the differentiation required by the Secretary of the Interior's Standards for Rehabilitation, namely Standard #9: "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." At the same time, "compatibility" is required, and a deviation from the Elements that is too obviously different from the character of the district, or that is so prominent as to distract from the surrounding context, can act counter to this "compatibility."
- The Elements of Design for Indian Village are provided in Sec. 21-2-103 of City Code. Nearly all are relevant to this proposed project. The elements are listed in full below, with staff comment following.
 - 1) *Height*: Virtually all of the houses in the district have two full stories plus attic or finished third floor within the roof. These are generally called 2½-story houses. Additions to existing buildings shall be related to the existing structure. New buildings shall meet the following standards:
 - a. The eight adjoining houses on the same face, excluding any houses built since 1930, churches, schools and commercial structures, shall be used to determine an average height. If eight houses are not available on the same block face, then one or more houses as close as possible to being directly across the street from the proposed structure may be used. On East Jefferson Avenue, the five existing houses shall be used. The height of the two adjoining houses shall be added into the total twice, with a divisor of ten (seven on East Jefferson Avenue) used to determine the average. Any new building must have a height of the main roof of at least 80 percent of the resulting average. In no case shall a new building be taller than the tallest roof height included in the computation. In determining the height of existing structures and proposed structures, the highest point of the main roof shall be used, even where towers, cupolas, or other minor elements may be higher.
 - b. The level of the eaves of a proposed new structure having as much or more significance for compatibility as the room height, an average eave or cornice height shall be determined by the same process provided for in Subsection (c)(1)a of this section. The proposed new structure shall have a height at the eaves or cornice, of not less than 90 percent of the average determined from existing structures, and in no case shall the eaves or cornice of the proposed structure be lower than the lowest eave or cornice height used in the computation, or higher than the highest.

Staff assessment: The applicant has provided an elevation indicating building heights on the block. The proposed building height (33 feet, 10 inches) falls within the range provided by the calculation described above (25 feet to 38 feet, 8 inches) and less than the tallest building on the block face. This element appears to be satisfied.



Block-length elevations showing roof heights, eaves, and massing. From submitted materials.

- 2) *Proportion of Buildings' Front Facades*: Proportion varies in the district, depending on age, style, and location in a specific subdivision. Height being established by the standards in Subsection (c)(1) of this section; proportion will be established by permitting no proposed building or addition to create a front façade wider or narrower than those existing on the same block.

Staff assessment: According to Office of the Assessor records, the widest building on the block is the non-historic 3030 Iroquois, at 53 feet, 9 inches. The widest historic building on the block is 2950 Iroquois, at 50 feet, 9 inches. The proposed building is 52 feet wide. This condition is satisfied, unless the Commission interprets the code to exclude the non-historic building, in which case the condition is not satisfied, but mitigated by the stepped nature of the façade, with its recessed northern bay and further recessed secondary mass.

- 3) *Proportion of openings within the façade*: Window openings are virtually always taller than wide; several windows are sometimes grouped into a combination wider than tall. Window openings are always subdivided, the most common window type being guillotine sash, whose area are generally further subdivided by muntins. Façades have approximately 15 percent to 35 percent of their area glazed. Sun porches with a very high proportion of glass subdivided by mullions and muntins are common.

Staff assessment: The proposed building adheres to the window expression described above. This element appears to be satisfied.

- 4) *Rhythm of solids to voids in front façades*: In buildings derived from classical precedents, voids are usually arranged in a symmetrical and evenly spaced manner within the façade. In examples of other styles, especially those of Neo-Tudor and Victorian substyles, voids are arranged with more freedom, but usually is a balanced composition.

Staff assessment: The proposed rhythm is asymmetrical, but balanced, with the weight of the front door and box-bay window on the northern half of the façade balanced by the weight of the balconet and trio of arched windows on the southern half of the façade. This element appears to be satisfied.

- 5) *Rhythm of spacing of buildings on streets*: The spacing of the buildings is generally determined by the setback from the side lot lines; these tend to be consistent, even though lot width may vary. Because of the existence of several subdivisions and their related subdivision and deed restrictions, the placement of buildings on lots varies from area to area in the district. In the case of very wide properties, two conditions exist. A very wide site may have a house placed centrally upon it, with extensive side yard space; this occurs only with extremely large houses by district standards. A more typical placement of houses of average size for the district is at the side of the wide site, placed normally in relation to one of the adjoining houses. The rest of the property is a side yard on the other side of the house, and the entrance is often oriented toward that side yard.

Staff assessment: As seen in the elevation on the previous page, the side setback (8 feet to the south, and 25 feet to the north) is comparable to that of other buildings on the block. This element appears to be satisfied.

- 6) *Rhythm of entrance and/or porch projections:* In those examples of classical inspiration, entrances and porches, if any, tend to be centered on the front façade. Other examples display more freedom with entrance and porch placement, with some having the main entrance at the side. Porches, often permanently enclosed sun porches, are often placed at the side of the building.

Staff assessment: Staff observes that while most buildings in Indian Village have porches, many only have small pediments or canopies, and examples that have no porches at all are not uncommon. There are several buildings of comparable style or massing that provide guidance as to the appropriateness of the proposed building. As the proposed building is not of classical inspiration, its entrance need not be centered. This element appears to be satisfied.



Clockwise from top left: 2168 Burns (similar massing), 3465 Burns (similar style), 3400 Burns (similar massing and style), 2921 Burns (similar massing). February 2025 photos by staff.

- 7) *Relationship of materials:* The majority of the buildings are faced with brick, while many are partially or totally stucco. There are some stone buildings; clapboard is rare, and almost never the sole material. Wood shingle is occasionally used as a wall covering, usually at the second floor level, and never as the sole material. Roofing includes slate, tile, and wooden and asphalt shingles. Stone trim is common. Wood is almost universally used for window frames and other functional trim, and is used in many examples for all trim. Because of the existence of several subdivisions and their related deed restrictions, the exterior textures and materials may vary from block to block in the district.

Staff assessment: Of all the elements, this is one of two that are clearly not satisfied. The proposed CMU material is not found in Indian Village; its appropriateness as a non-historic material is discussed separately below. The optional proposed alternative, painted brick, would meet this element (though it would fail the subsequent element; its appropriateness is also discussed separately below). The other proposed materials of wood, stone, and asphalt shingles would meet the elements of design.

- 8) *Relationship of textures:* The most common relationship of textures in the district is that of the low-relief pattern of mortar joints in brick contrasted to the smooth surface of wood or stone trim. The use of stucco or concrete, with or without half-timbering, as a contrast to brick surfaces is not unusual. Tile, slate, or wood shingle roofs have particular textural values where

they exist. Asphalt shingles, generally, have little textural interest, even in those types which purport to imitate some other variety.

Staff assessment: This is the other of the two elements that is not satisfied. The proposed CMU material would introduce a novel texture to the district. The painted brick alternative would provide the prescribed “low-relief pattern of mortar joints in brick,” but then diminish the visibility of this texture by painting it a monochrome color. (Additional analysis is provided separately below.)



There is one example of painted brick in the vicinity, at 3060 Iroquois. Staff suggests it is unlikely that this is the original condition.

- 9) *Relationship of colors:* Natural brick colors (red, yellow, brown, buff) predominate in wall surfaces. Natural stone colors also exist. Where stucco or concrete exists, it is usually left in its natural state, or painted in a shade of cream. Roofs are in natural colors (tile and slate colors, wood colors) and asphalt shingles are predominantly within this same dark color range. Paint colors often relate to style. The classically inspired buildings, particularly Neo-Georgian, generally have woodwork painted white, cream or in the range of those colors, including putty. Doors and shutters are frequently dark green or black. Colors known to have been in use on buildings of this type in the 18th Century or early 19th Century on similar buildings may be considered for suitability. Buildings of Medieval inspiration (notably Neo-Tudor) generally have painted woodwork and window frames of dark brown or cream color. Half-timbering is almost always stained dark brown. Queen Anne or Late Victorian examples may have several paint colors on a single façade. These tend to be dark in tone and frequently of the earth tone family. The original colors of any house, as determined by professional analysis, are always acceptable for that house, and may provide suggestions for similar houses.

Staff assessment: The proposed colors are consistent with Color System C (Colonial Revival, Neo-Dutch Colonial, Neo-Georgian, Post-Depression Colonial), Color System D (English Revival), Color System E (Prairie, Bungalow), and Color System F (Neoclassical, Mediterranean). This element appears to be satisfied.

- 10) *Relationship of architectural details:* These generally relate to style. Neo-Georgian buildings display classic details, mostly in wood, and sometimes in stone. Areas commonly, but not always, treated are porches, shutters, window frames, cornices, and dormer windows. Details on Mediterranean style or vernacular buildings are often done in stone, brick, tile, and sometimes in stucco. They include arched windows, door openings, and porches. Buildings of Medieval inspiration tend to have details in the form of carved wood or carved stone ornament on window frames, door frames, and eaves. Queen Anne or Late Victorian style buildings tend to have details in wood, stone, or molded brick commonly embellishing cornices, window frames and door frames. In general, the various styles are rich in architectural details.

Staff assessment: The proposed building is rich in architectural detail of stone and wood. This element appears to be satisfied.

- 11) *Relationship of roof shapes:* Roofs with triangular gables and hip roofs predominate. A few examples of the gambrel-type roof exist. Complex arrangements of the gabled and/or hip types, with subsidiary roofs, are not unusual. Dormers are common. Flat roofs exist primarily on porches and sunrooms, and other minor elements; large hip roofs sometimes have relatively small flat sections in the center.

Staff assessment: The proposed hip roof is consistent the Elements of Design; many side-hip roofs are found within the district, both with and without dormers (see example photos on page 7; note also that the dormers at 2168 Burns do not appear to be original). This element appears to be satisfied.

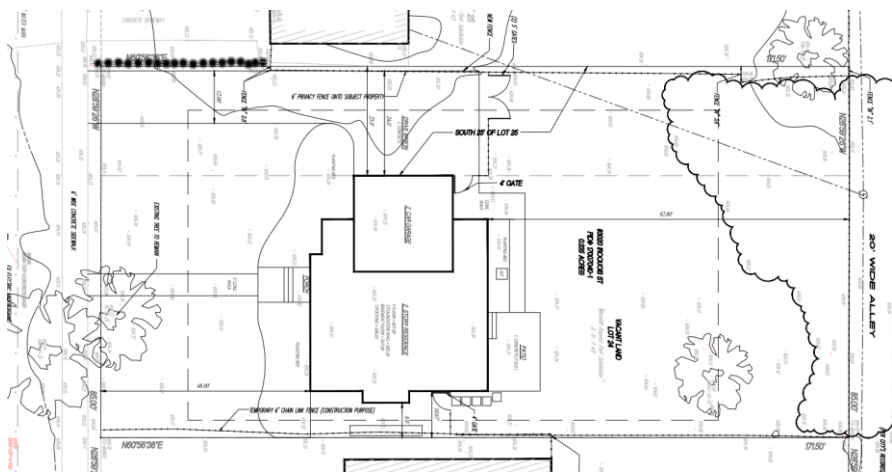
- 12) *Walls of continuity:* The major wall of continuity is created by the buildings with their uniform setbacks within the blocks. New buildings should contribute to this wall of continuity. Where gaslights are sufficiently numerous, and where trees in rows have survived in sufficient numbers, minor walls of continuity are created. Fences across side lots contribute to the major wall of continuity where placed at the front yard setback line.

Staff assessment: The proposed building continues the wall of continuity established by the nearby historic buildings (the non-historic building at 3030 Iroquois projects further forward). This element appears to be satisfied.

- 13) *Relationship of significant landscape features and surface treatment:* The typical treatment of individual properties is a flat front lawn area in grass turf, often subdivided by a walk leading to the front entrance, and sometimes with a walk at the side leading to the rear. Materials for such walks are concrete, brick, or stone, or combinations of those materials. Some front yards have rectangular raised earthwork terraces upon which the house stands. These unpaved terraces have sloping embankments or brick and/or stone retaining walls at the change of grade. Foundation plantings, often of a deciduous character, characteristic of the period 1895 to 1930, are present virtually without exception. Hedges between properties, and ornamental front yard fences or hedges are not uncommon. The American elm is virtually extinct in the district, though once the dominant tree. Replacement trees should be characteristic of the area and period, though only a disease-resistant American elm would be a practical choice. Plantings of new trees should be directed toward the restoration of the former straight-line rows of large trees on the front yards and tree lawns. Straight side driveways leading from the street to rear garages exist, but alley-facing garages are common, particularly in the southern portion of the district. Where alley-facing garages are common, the lack of driveways lends a unity to the succession of front lawns. Driveway materials include concrete, brick and gravel. Side lots are not uncommon in the district, and a number of these form a part of the original site plan for the residence. Such side lots are usually landscaped, often fenced at or near the setback line, and very occasionally contain paved areas such as a tennis court. The street right-of-way of 80 feet combined with a pavement width of between 24 and 29 feet creates wide tree lawns or berm areas, which adds to the generous ambience of the urban landscape of the district. Street pavements are now asphalt; cut stone curbs still exist in portions of the district. Alleys are frequently paved with brick, particularly where alley-facing garages are common. Fencing ranges widely in type; fencing in public view was generally designed to compliment the style, design material, and date of the residence.

Staff assessment: The proposed site plan includes a large grass lawn area, subdivided by a straight concrete walkway leading to the front entrance of the building. Foundation plantings are depicted around the front and rear, and part of the sides, of the house. The elm tree (not an

American elm) would be retained, and the proposed maple would continue to maintain the district's tree canopy. The driveway is straight and located to the side of the house (alley access is not possible, as the alley has been vacated). Driveways are common on this block (see the contextual photos on page 2). The property is already fenced on the sides and rear by adjacent properties.



Proposed site plan from application documents (cropped by staff to exclude surrounding areas; please see application materials for complete image). A separate landscape plan, with additional detail, is also provided.

- 14) *Relationship of open space to structures:* Open space in the district occurs in the form of vacant land, a City park, school yards for the Waldorf and Nichols Schools, and side lots. Where an original or early arrangement of a house and grounds included and still includes landscaped lots which form part of the landscaping plan for the residence, such landscaped lots are significant landscape features.

Staff assessment: This element does not apply to the subject parcel, as it is proposed to be developed with a house.

- 15) *Scale of façades and façade elements:* There is a variety in scale from block to block and style to style; most houses have a large and substantial appearance. The size and complexity of façade elements and details either accentuate or subdue the scale of the façades. Façade elements have been determined by what is appropriate for the style. Large wings at the front are atypical, while small wings at the side, usually in the form of sunrooms and sunporches, are common. Window sashes are usually subdivided by muntins, which affect the apparent scale of the windows within the façades.

Staff assessment: The proposed building has a large and substantial appearance, accentuated by its steep, side-hip roof. It also has a small side wing and subdivided casement windows. This element appears to be satisfied.

- 16) *Directional expression of front elevations:* In general, the expression of direction is neutral.

Staff assessment: A overall vertical expression is established by the openings of the proposed building: the tall, single entrance door, and the relatively narrow casement windows, their verticality extended by arched tops in the case of the row of windows on the first floor. The steep hip roof also enhances this verticality. Horizontal elements, such as the balconet, the single-story wing, and the prominent, wide eaves add balance. This element appears to be satisfied.

- 17) *Rhythm of building setbacks:* Because of the existence of various subdivisions and their related subdivision and deed restrictions, setbacks vary from area to area within the district, though

they are consistent within each block or area. The varying designs of the houses, occasionally with slight setbacks in the façades, cause the houses to relate to the front setback line in different ways; this creates a slight variation in the setback line. Nevertheless, within each block or area, a wall of continuity is created.

Staff assessment: The proposed plan shows a proposed setback of 48 feet, within a few feet of other setbacks on the same block (there is a slight variation between different buildings on the block). This element appears to be satisfied.

- 18) *Relationship of lot coverage:* Lot coverage ranges from 50 percent to 12 percent or less in the case of homes with large yards. Most homes are in the 20 percent to 30 percent range of lot coverage.

Staff assessment: The proposed building appears to occupy a little over ten percent of its parcel, at the low end of the range described above. This element is satisfied.

- 19) *Degree of complexity within the façade:* The degree of complexity has been determined by what is typical and appropriate for a given style. The classically inspired buildings usually have simple, rectangular façades with varying amounts of ornamentation. Other styles, such as Queen Anne and those of Medieval inspiration, frequently have façades complicated by gables, bays, slight setbacks, porches, and occasionally, turrets.

Staff assessment: The façade has a moderate degree of complexity, comparable to historic buildings in the vicinity (again, see comparative photos on pages 2 and 7). The planar façade is broken by its recessed northern bay and complexity is added by more elaborately detailed elements such as the balconet and the box-bay window. This element appears to be satisfied.

- 20) *Orientation, vistas, overviews:* While most of the buildings are oriented toward the street, it is not unusual for an entrance to face the side, especially in the case of a landscaped side lot or corner house. The street façade in these cases is well coordinated with the rest of the street façades. Garages are frequently oriented either toward an alley or a side street; almost all garages are detached and at the rear of the lot. In those few cases where pre-1930 houses have attached garages, they are at the rear and are entered from the side or rear. The doors of such attached garages are generally not visible from the street.

Staff assessment: The proposal features a two-car, attached garage that is inconsistent with this element as it is not “at the rear” with doors “generally not visible to the street.” Staff assesses that while an attached garage is reasonably appropriate for a new construction house, its visibility should be limited. The landscape plan shows that this is partly accomplished with landscaping, particularly a proposed magnolia that is expected to reach 8 feet in height at maturity. Visibility is also partly blocked by the placement of the non-historic house to the north, which is placed closer to the street than the historic houses on the block. However, staff notes that the garage door is not specified (see “Issues,” below). Although the garage appears to be appropriate in elevation, the choice of the door will affect how clearly it will be noticed from the street. A darker color will help it recess and be less conspicuous, as will division of the panels into smaller units to reduce its apparent horizontal emphasis and flatness. A choice of textures or designs expressing depth or shadow lines will help it appear less flat, especially in the division of the proposed windows. Additionally, the garage opening itself could be divided into two single bay doors, divided by a pier, similar to many historic prototypes in the district. In conclusion, this element is not fully satisfied, but can be mitigated.



The applicant has provided several images of early-twentieth-century houses (but not in Detroit) that employ a painted CMU wall material. Additional examples are provided in the submitted materials.

- The applicant has provided examples of early-twentieth-century houses that use a painted CMU wall material. However, the example images provided by the applicant are from more rustic-inspired, or cottage-like Tudor Revival houses. In staff opinion, the more formal design vocabulary of the proposed building would seemingly call for a more refined finish.
- Although not specifically stated in the narrative, it seems that the proposed painted CMU may be intended as a reference to the general visual qualities of true stucco. Indeed, that would be the strongest argument for its compatibility, in the opinion of staff. However, staff opinion is that the unitized (by definition) nature of CMU is fundamentally at odds with the seamless finish of trowel-applied stucco.
- The proposed alternate painted brick, by contrast, employs a material that is consistent with the Elements of Design and is commonplace in Indian Village. That the brick is proposed to be painted is, in staff opinion, a minor differentiation that is appropriate for a non-historic house while not distracting from the overall character of the surrounding district.
- The choice of aluminum-clad windows, the Marvin Ultimate line with simulated divided lites, is in staff's opinion appropriate as these are high quality windows which have the ability to reproduce historic profiles, and the home is of new construction.
- Staff has no issues with the design for the rear, which features a more contemporary arrangement of traditional elements.

ISSUES

- Staff opinion is that the proposed painted CMU does not provide an adequate balance between differentiation and compatibility, as required by the Standards, but the proposed painted brick alternative does.
- Staff notes that while the site plan shows that an existing tree will be retained, staff notes that there are actually two trees growing in close proximity, it is not clear which will be retained.
- A specification for the garage door is not provided (the drawings state only "carriage style overhead door (Clopay as design basis)"). The selected garage door and its opening should incorporate design features that limit its visibility and apparent size/flatness, including smaller subdivisions, dark colors, and compatible textures. Any divided lights should share the same finely detailed expression as the specified windows for the rest of the house.

RECOMMENDATION(S)

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

Recommendation 1 of 1, Certificate of Appropriateness

Staff recommends that the proposed work will be appropriate according to the Secretary of the Interior's Standards for Rehabilitation and the Indian Village Historic District's Elements of Design, with the conditions that:

- The proposed alternative painted brick depicted on page 13 of the submitted drawings shall be used; painted CMU shall not be used.
- The elm tree shall be retained (the mulberry may be removed).
- The final selection of garage door shall prioritize an inconspicuous design, subject to review by staff.