

**ADDRESS: CITYWIDE****APPLICATION NO: HDC2025-00017****HISTORIC DISTRICT: CITYWIDE****APPLICANT: ANDREW GAINES/CITY OF DETROIT HOUSING REVITALIZATION DEPARTMENT****DATE OF STAFF SITE VISIT: N/A****DATE OF PROVISIONALLY COMPLETE APPLICATION: 1/21/2025****SCOPE: REPAIR/REPLACE SANITATION SEWERS****EXISTING CONDITIONS**

The City of Detroit Housing and Revitalization Department (HRD) reports that the U.S. Department of Housing and Urban Development (HUD) allocated the City of Detroit, \$95,228,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following record storm events which occurred in June 2021. Using this funding, the City established its Private Sewer Repair Program (PSRP), which will provide repairs and upgrades to houses hardest hit by the June 2021 flooding disaster. These repairs will help reduce the risk of basement flooding, as severe weather events are becoming increasingly more frequent. The program is a partnership between HRD along with the Detroit Water and Sewerage Department (DWSD). The city is funding the \$43 million program with a portion of the \$95 million in disaster recovery funds it received from HUD. Additionally, \$9 million will be designated for sewer lateral reconnections in alleys that have been identified by DWSD. The program is expected to help up to 1,500 eligible Detroit households with repairs to damaged portions of sewer lines that fall within their private property line. Only residential properties with 1-4 units are eligible for the program.

Currently, 22 neighborhoods in Council Districts 4, 6, and 7 are eligible for the program. None of these neighborhoods include residential properties located in a local historic district. However, the City is seeking to expand the geography of the program to add a number of neighborhoods across the City/in each of its 7 Council Districts, to include a number of local historic districts such as Russell Woods-Sullivan, Atkinson Avenue, Oakman Boulevard, Boston Edison, Arden Park, Eastern Market, Jam Handy/North End-East Grand Boulevard and potentially others.

**PROPOSAL**

As the project will involve a large number of properties across the city, the applicant is seeking a programmatic Certificate of Approval for PSRP activities which are performed according to a well-defined list of conditions in order to streamline the process and allow for the timely deployment of the work. Any work associated with the program that falls outside of the Commission's defined conditions would be subject to individual review/the Commission's regular application process.

The project seeks to undertake work which will reduce the risk of basement flooding for properties/homeowners who elect to participate in the program. Per the submitted materials, specific exterior work items include the following:

- Clean and inspect private lateral sewer (camera scope) from home to the point of connection with the public sewer (not the alley right of way line).
- Repair or replace private lateral sewer and install cleanout.
- Install backflow water valve on private lateral sewer.
- Install backflow water valve and sump pump with sump pump overflow

- Disconnect downspout and install extensions, where possible to a proper place of disposal. Extension shall be at least 3 feet from the building foundation.
- Install sump pump overflow to discharge outside to surface (applies to existing sump pumps only) where there is a backflow water valve existing on the sanitary line.
- Restore disturbed landscaping and hardscape
- Restore disturbed wood, chain link, or vinyl fencing in kind

## **STAFF OBSERVATIONS AND RESEARCH**

- Staff reviewed the Commission’s meeting minutes from February 1982 and noted that the body approved “...guidelines for the reconstruction of the severely damaged lateral sewer that provides for the protection and where necessary, the replacement of significant landscape features...” within an undefined easement area in an unnamed historic district. While the guidelines were targeted to specific area and the location of the area is unknown, the minutes do indicate that the Commission has allowed for the development of guidelines around the repair/replacement of lateral sewers with a local historic district.
- Participation in the PSRP program is voluntary
- The program’s above-grade impact on building exteriors appears to be limited to cutting downspouts and the addition of downspout extensions. Staff therefore concludes that the project’s potential to impact buildings within historic districts is minimal.
- Much of the exterior work associated with the program will involve ground disturbing activities related to the repair/replacement of sewer laterals, the installation of associated equipment, and work related to the restoration of the impacted sites. As the existing sewer equipment is not significant, its repair or replacement will not detract from historic districts. However, the associated sitework does have the potential to impact historic properties. Note that the City will contract with professional tradespeople to undertake the sitework and, as such, the scope of the work is well defined and limited to the following according to the submitted documentation:
  - Where sections of wood fencing are removed or damaged, replace with new wood fencing
  - Where sections of chain link fencing are removed or damaged, replace with new chain link fencing
  - Where sections of vinyl fencing are removed or damaged, replace with new vinyl fencing
  - Repair damaged concrete elements in the public right-of-way with new concrete, to include sidewalks, curbs, gutters, and roadway pavement
  - Repair damaged concrete driveways and walkways with new concrete
  - Adding seed, sod, hydroseeding, and mulch to restore damaged area
  - Tree removal where necessary (to include roots and stump)
  - Tree, shrub, or plant removal and replacement where necessary (same species or a species as allowed in the project specifications). The location of the trees will be determined by the City of Detroit Engineer

Staff concludes that the replacement or repair of sewer laterals, the installation of associated equipment, and the in-kind restoration of site features as described above, would generally be appropriate within historic districts and therefore appropriate for approval under a programmatic COA with the exception of the removal/replacement of mature trees/landscaping. Specifically, note that the replacement of mature/historic landscape features damaged/required for removal by the project with the same species is possible under the PSRP program. However, any new replacement plantings will not replicate the scale, character, and age of the mature plantings. Therefore, this work specific work item should be reviewed on a case-by-case basis by the Commission according to their regular application process.

- Any other work which is required for the repair/replacement of sewer laterals and/or the resulting restoration of the site beyond the above-listed scope items would fall outside of the City contracted scope activities and therefore would be the responsibility of the property owner. Specifically, these items include the following:
  - Removal/damage/replacement of hardscape other than concrete
  - Removal/damage/replacement of existing independent historic structures or other historic elements within private property and/or public right-of-way
  - Removal/damage/replacement of historic and/or specialty fencing and walls

It is staff's opinion that work in the above-listed categories should not be covered under a programmatic COA and therefore should be subject to review on a case-by-case basis by the Commission according to their regular review process.

## ISSUES

- While significant landscape features which might be damaged as a result of the project could be replaced with a new element of the same species, the new planting typically cannot replicate the original in scale and character.
- The project will replace areas of standard, non-historic wood, vinyl and chain link fencing in kind. However, the City's districts include a range of historic, character defining fencing and walls which, if impacted by the project, will not be replaced by the City. Work that falls in this category should not be approved via a programmatic COA/should be reviewed on a case-by-case basis according to the HDC's regular application process
- The PRSP will replace areas of standard concrete sidewalks, curbs, gutters, and roadway pavement damaged by the work in kind. However, the City's districts include a range of historic, character defining hardscape which, if impacted by the project, will not be replaced by the City. Work that falls in this category should not be approved via a programmatic COA/should be reviewed on a case-by-case basis according to the HDC's regular application process

## RECOMMENDATION(S)

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

### **Recommendation 1 of 1, Certificate of Appropriateness: Repair/Replace Sanitation Sewers**

Staff recommends that the proposed work will be appropriate according to the Secretary of the Interior's Standards for Rehabilitation, with the condition that:

- An application for any work that has the potential to damage the structural integrity of a building within a local historic district shall be submitted to the Commission for review under its regular process
- Where disturbance to elements within districts (including sidewalks, streets, shrubs, trees, fences, lawns, curbing, etc) results from the proposed work, the affected area shall be restored to replicate its pre-construction condition. If replication of the element is not possible, an application for the work shall be submitted to the Commission for review under its regular process
- Any trees, shrubs, perennials, groundcovers or similar permanent plantings shall be preserved and protected in situ to the extent feasible. The City shall request that the property owner identify such plantings prior to commencement of the work. Any such designated plants heavily damaged or destroyed by the work (either directly or within one calendar year due to excessive disturbance or transplantation) shall be replaced by the City with reasonably similar species/cultivars of similar size, type, quantity and quality, and installed by the City's landscape contractors. Such

replantings shall be warranted by the City and its contractor for one (1) additional calendar year.

- Historic built/architectural elements which will be disrupted by the work shall be retained, securely stored and properly reinstalled. If the work will damage such elements or require their removal, an application for the work shall be submitted to the Commission for review under its regular process
- If the project will damage or require the removal of any historic/significant landscape or hardscape feature, including but not limited to mature specimen trees, an application for the work shall be submitted to the Commission for review under its regular process.
- If the historic status of any element which is required to be removed or subject to damage by the project is in question, HDC staff shall be afforded the opportunity to consult prior to undertaking the work