

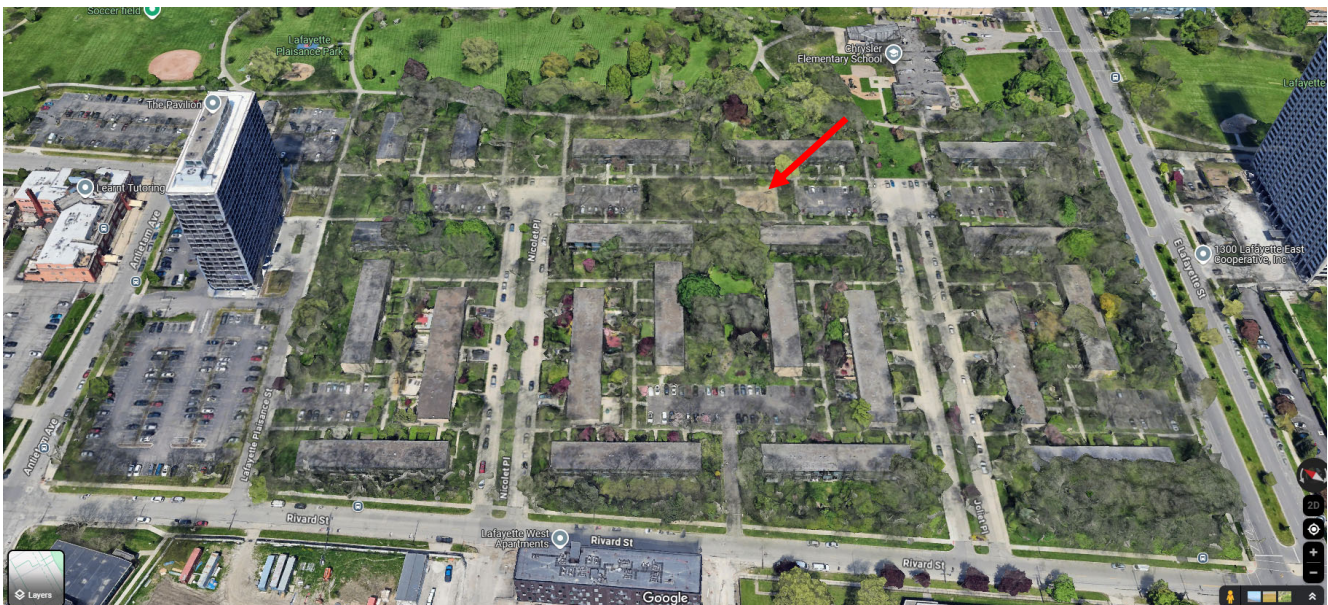
REVISION 2 STAFF REPORT 05-14-2025 REGULAR MEETING PREPARED BY: G. LANDSBERG
APPLICATION NUMBER: HDC2025-00243
ADDRESS: 1395 ANTIETAM, 1 LAFAYETTE PLAISANCE, 1301 NICOLET PLACE, 1300 NICOLET PLACE, 1301 JOLIET PLACE, 1300 JOLIET PLACE, AND ADJACENT RIGHTS-OF-WAY
HISTORIC DISTRICT: LAFAYETTE PARK/MIES VAN DER ROHE
APPLICANT: DETROIT THERMAL
ENGINEER: GIFFELS WEBSTER
OWNER OF RECORD: MULTIPLE (PRIVATE)
DATES OF STAFF SITE VISITS: 04-28-2025, 05-09-2025

SCOPE: EXCAVATE FOR EXISTING STEAM PIPE SLIPLINING AND NEW STEAM PIPE INSTALLATION, INSTALL CONSTRUCTION FENCING/TREE PROTECTION, RESTORE CONCRETE CURBS/LANDSCAPE/PAVEMENT, INSTALL PERMANENT STEAM STACKS (WORK STARTED WITHOUT APPROVAL)*

***Edit 05-14-25, Revision 2: HDC staff has received and posted revised drawings from the applicant. This report has not yet been updated to respond to these changes.**

EXISTING CONDITIONS

The project extents span a distance of approximately 1,500 feet from Antietam Avenue to East Lafayette, across the heart of the Mies van der Rohe townhouse complex. This area is generally the western half of the historic district; bound by Antietam to the north, Rivard to the west, and East Lafayette to the south.



Aerial view of general area of work (western half of district). Rivard Street (at image bottom) runs north from East Lafayette (at right) to Antietam Avenue (at left). The northwest corner of the district is dominated by the Pavilion building, addressed as 1395 Antietam and accessed from Rivard via Lafayette Plaisance. The 1300 East Lafayette building, not in the historic district, is visible at far right, south of East Lafayette. The townhouse complexes, including landscaping, populate the intervening space. The existing large playground (marked with a red arrow) sits close to the old Macomb street intersection with Russell. Nicolet Place (center left) and Joliet Place (center right) project eastward into the townhouses. Lafayette Plaisance, Nicolet Place, and Joliet Place occupy the positions of the former Mullett, Clinton, and Monroe Streets that extended easterly from downtown (see next page).

The project area is along the former Russell Street corridor predating the construction of Lafayette Park, and intersects with the parking areas terminating Nicolet and Joliet Place. The vicinity is occupied by the architecturally outstanding Mies van der Rohe townhouses and abundant, well-developed landscaping dating to original designs by Mies and Alfred Caldwell. Along with passive landscape, some recreational/active uses featuring playground equipment also exist in harmony with the mid-century context.

According to the Historic Designation Advisory Board report for the district, prepared in 2002, the district

possesses “exceptional importance in the history of community planning and development, modern architecture, and social history.” The district is a primarily residential community composed of several separate developments positioned around a central park.



Pre-clearance Sanborn map of Black Bottom in late 1940s. The intersection of Russell Street and Macomb Street, the approximate location of the current playground within the Lafayette Park townhouse complex, is indicated by a red arrow.



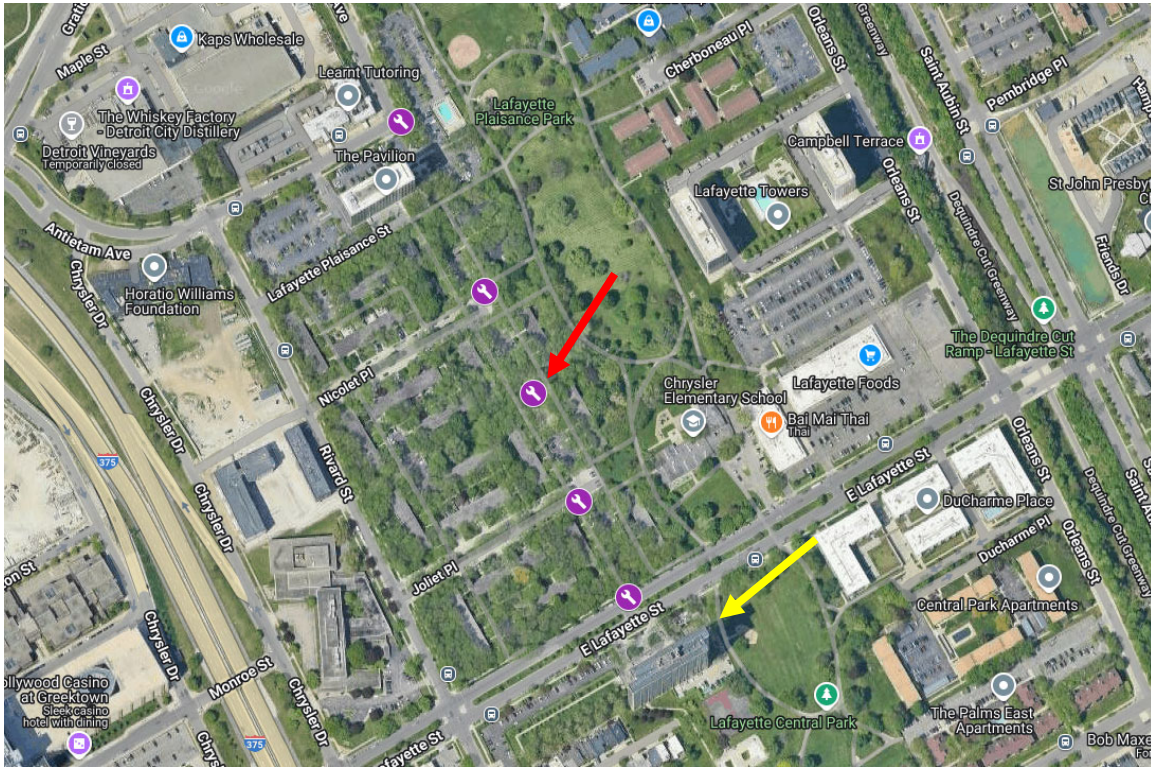
View to the north showing proposed work area at East Lafayette, looking into the townhouse complex. The shrubs enclosing the sidewalk are within the area of work, as is the root system of the tree. Staff photo, May 9, 2025.



View of original concrete bench, one of several. This example is within the proposed "Old Macomb" excavation area near the playground in the townhouse complex. Note damage to yew at left and magnolia tree at right. Staff photo, May 9, 2025.

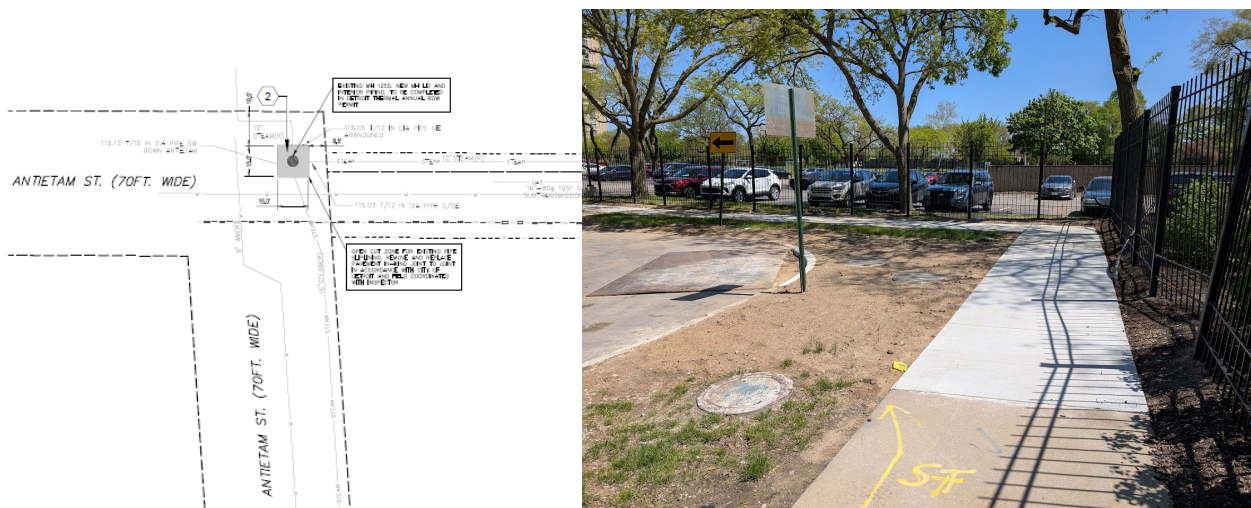
PROJECT DESCRIPTION

Per the submitted drawings*, the applicant is proposing to excavate and conduct ground disturbing activities for the slip-lining and extension of an existing steam pipe line running north to south through the former Russell Street ROW in Lafayette Park's townhouse complex. The work begins at the Antietam corner near the Nellie Leland School (also a city historic district) adjacent to the Pavilion building, and ends in the East Lafayette right-of-way in front of 1300 East Lafayette. As part of the steam line activation, two 8' tall steam stacks are to be placed in locations adjacent to the existing parking lots at Nicolet and Joliet Place.

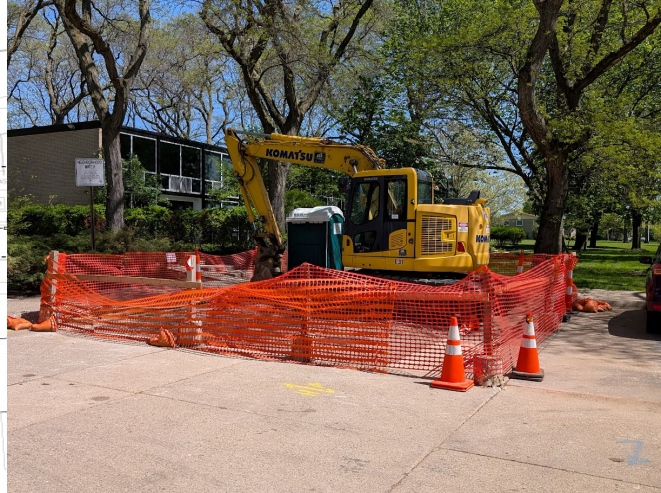
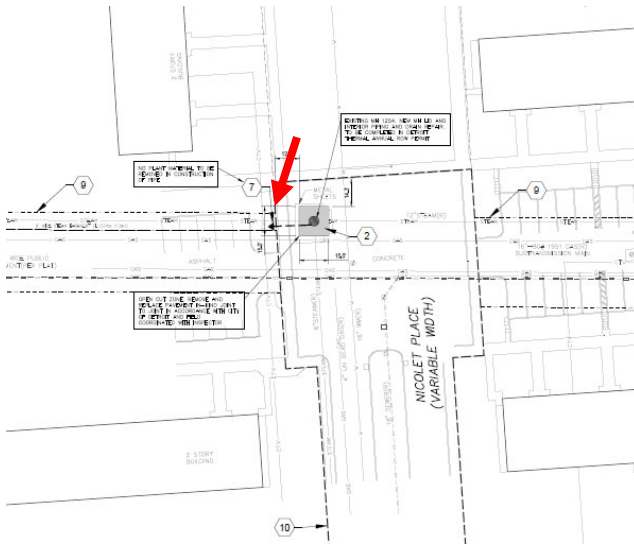


The five separate work areas are marked by purple dots in this diagram produced by staff. 1300 East Lafayette, the target of the steam expansion project, is identified by the yellow arrow. The playground, or "Old Macomb" location, is marked by a red arrow.

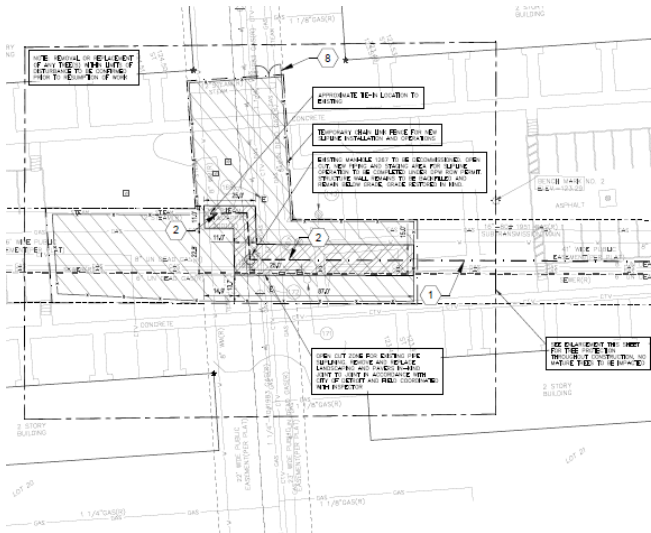
The proposed work involves five separate excavation areas, depicted individually below, from north to south. Please refer to the original drawings for full resolution images and complete legends/key notes:



1 – Antietam vicinity, from applicant documents (not to scale). Staff photo, May 9, 2025. This work appears to be complete.

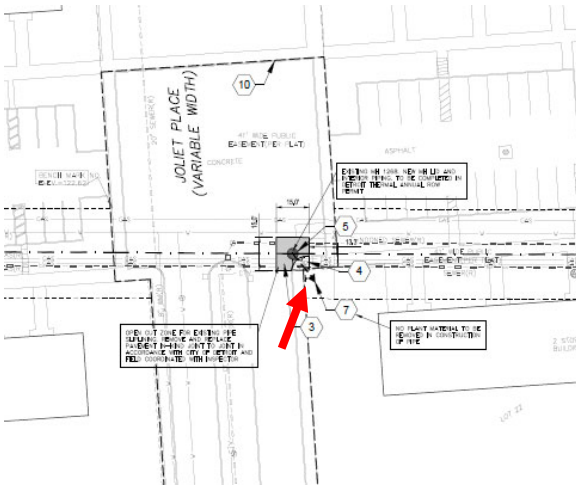


2 – Joliet Place vicinity, from applicant documents (not to scale). This location will feature a steam stack, located at the black triangle marked with key note 7 and highlighted by the red arrow. Staff photo, May 9, 2025. This work appears to have started but not completed. A small excavator is on site.

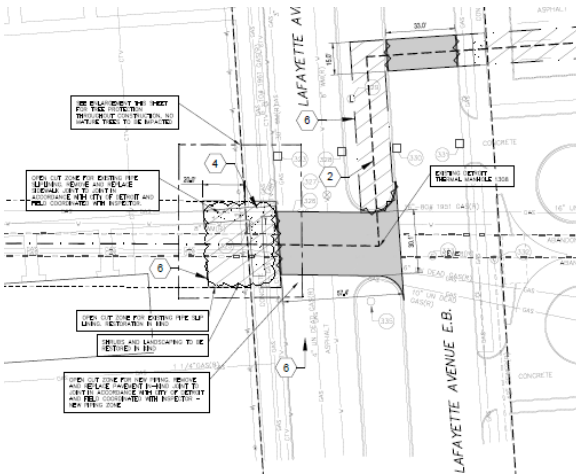


3 – “Old Maccomb” vicinity, from applicant documents (not to scale). Staff photo, May 9, 2025. This work is adjacent to the playground. Some ground disturbance activities and damage to specimen shrubs have been observed.

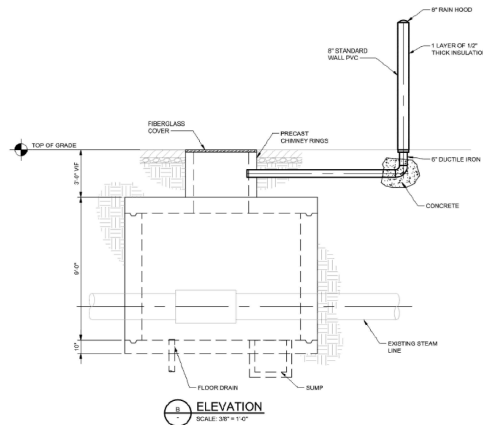
***Edit 05-14-25, Revision 2: HDC staff has received and posted revised drawings from the applicant. This report has not yet been updated to respond to these changes.**



4 – Joliet Place vicinity, from applicant documents (not to scale). Staff photo, May 9, 2025. Work appears to have started but not completed.



5- East Lafayette vicinity, from applicant documents (not to scale). Staff photo, May 9, 2025. No work observed in progress.



Detail drawing and photo example of an 8' steam stack, from applicant documents (not to scale). Per the applicant, both the stack and the adjacent manhole cover are of synthetic materials that will not transfer heat.

STAFF OBSERVATIONS AND ANALYSIS – CERTIFICATE OF APPROPRIATENESS (COA)

- The Lafayette Park – Mies van der Rohe Historic District was established in 2002. The district, composed of strikingly modern buildings juxtaposed with masterfully designed landscapes, was built on an “urban renewal” site created by the razing of the former Black Bottom neighborhood in the late 1940s.
- The Designation Report repeatedly emphasizes the multi-disciplinary design of Lafayette Park, combined into a complete and unprecedented original development that uniquely captured the aesthetic and social planning ideals of the 1950s and 1960s. HDAB notes that “Lafayette Park was obviously a project well-suited to the talents and interests of Mies, Greenwald, Hilberseimer, and Caldwell. When the project began, the 78-acre site had been so completely stripped that only the street grid remained.” This is vividly illustrated by the below maps, found in PDD files, which shows before/after of the area.



Pages from PDD’s “site study” book, circa 1950s, show the former Black Bottom street grid at left (i.e., “before,” and the clearance/redesign for Lafayette Park at right. Note the existing utility runs left behind below grade in the “after” image, a ghostly remnant of the earlier street grid relevant to the current application for pipeline work, which seeks to make use of this existing infrastructure.

- Per the Historic Designation Advisory Board (HDAB) Report as accepted by City Council, the district was a combination of the talents of four practitioners:
 - Mies van der Rohe, architect
 - Herbert Greenwald, a Chicago developer
 - Ludwig Hilberseimer, urban planner
 - Alfred Caldwell, landscape architect trained under Jens Jensen
- **Mies van der Rohe**, “widely regarded as one of the greatest architects of the twentieth century” per the city’s Historic Designation Advisory Board, “believed that the form of a building must be a clear expression of its structure.” His work, wherever still extant, is of worldwide cultural and architectural importance; Detroit is fortunate to hold and preserve such an extraordinary heritage. HDAB continues:

Mies’ extensive use of steel, glass and reinforced concrete in the later stages of his career, as evidenced in his Lafayette Park buildings, reflected his belief that these were the materials most expressive of modern technology.

- Writing about the (two-story) townhouse and (single-story) court buildings that were erected from 1958-1960, and occupy the southwest corner of the district subject to this proposal, HDAB reports that:

Owned by four cooperative associations, the townhouse complex was built in 1958-60 on an eighteen-acre site west of the central park. Its twenty-one buildings accommodate 186 units...All buildings have poured reinforced concrete foundations and a framework of welded steel. In typical Miesian fashion, proportions are carefully calculated and the structure of the buildings is undisguised. Projecting wide-flange steel columns punctuate the 12-foot bays of

front and rear elevations, where they not only provide structural support but are aesthetically pleasing as well...

- The HDAB report also discusses the significance of **Alfred Caldwell's** landscape, particularly in its mature form:
 - *Caldwell's design of a naturalistic landscape - which today provides a lush background and dappled shade for Mies' still eminently "modern" architecture - completed the picture of "a suburb in the city."*
- Importantly for HDC's identification of distinctive character-defining features, the HDAB report speaks at length concerning the importance of Caldwell's landscape design in and around the townhouses, including the construction of the automobile parking areas below the grade of the adjacent landscaped areas, to minimize their visual clutter:

Mirrored in the glass walls of the townhouses, Caldwell's naturalistic landscape further reduces the impact of the automobile, and with its free-flowing informality, it also makes an excellent counterpoint to the austerity of the architecture. Various types of native trees and shrubs delineate open and sheltered areas and provide screening. Honey locusts with their fernlike foliage dominate the canopy; the understory includes flowering crabapple, dogwood, lilac, and viburnum. Hawthorn hedges demarcate the small front lawns of the two-story units, and at the rear of these buildings, is the "meadow," a fairly open green....

Together with the landscaping, the layout of the townhouse buildings defines the exterior spaces but does not enclose them. The overall effect is one of considerable privacy and intimacy... the townhouse complex in 1960 had what Architectural Forum described as an air of "comfortable repose." As Caldwell's trees and shrubs have matured, that feeling has increased.

Well-maintained and in good condition, the townhouse complex has experienced relatively few exterior changes. The natural maturing of its landscaping has been the most noticeable one...Although the landscape is no longer as open as in Caldwell's original plan, honey locusts with an understory of other native trees and shrubs still predominate.

- Staff notes, incidentally, that Lafayette Park is not only a local historic district recognized by City Council and subject to HDC permit review, but is separately listed as a resource in the federally maintained National Register of Historic Places since 2003. Further to this, since 2015, the district has been elevated to the status of a federal *National Historic Landmark*, one of only 42 such properties in the State of Michigan (an exclusive list that also includes the Ford Piquette Plant and Diego Rivera's Detroit Industry murals at the DIA). National Historic Landmark is a top-level federal designation reserved for this nation's most critically important historic resources. Only about 2,500 of the nearly 100,000 American places listed on the National Register are recognized as National Historic Landmarks. Lafayette Park is within this top 3% nationwide, and one of the city's most important internationally recognized cultural and historical sites, drawing thousands of visitors per year.
- Relevant to the property's status as a National Historic Landmark as noted above, PDD staff is in receipt of a letter of concern from the National Park Service concerning the potential impacts of the subject application, which is included on the website for the Commission's review under the Public Comment submissions.
- The proposed work describes large areas of disturbance and excavation covering substantial portions of the mature landscape, especially at the Old Macomb ("playground") location. This vicinity holds a large and well-developed collection of mature woody plants, including at least twelve (12) honey locust trees approaching 80 years in age (i.e., original to the Mies/Caldwell plan), and smaller tree/shrub species including cotoneaster, yew, oakleaf hydrangea, redbud, viburnum, dogwood, and white spruce. Additional ground covers and perennial beds hosting pachysandra, hosta, ferns, and flowering bulbs were observed.

While above-grade tree protection is proposed for the larger honey locust trees, there is no apparent restriction on excavation or compaction within their drip zone/root zone, which may threaten tree survival. The ornamental trees and shrubs described above are decades old and have reached a mature size so that they contribute to a unified mature landscape, adding their shade and beauty to the overall protected composition.



View to the east showing the proposed work area (marked by community members with yellow tape). Note both the density of the shrub canopy, obscuring the nearby townhouse complex beyond, but the variety of specimens, including redbud, cotoneaster, white spruce, and viburnum in this single image. Staff photo, May 9, 2025.



View to the southeast of the northern “wing” of the proposed Old Macomb work area, marked in yellow tape by community members. While the trees are to be provided some protection, several large shrubs and mature planting beds may be at risk from work activities. Note again the screening effect of the inter-building landscaping, mostly hiding the building across the way, as well as the dappled shade. Staff photo, May 9, 2025.



View to the east at the playground, taken from within the proposed excavation area (marked by red tape). Note that the vintage and original playground equipment is within the area of disturbance/work area delineated by the yellow tape. Staff photo, May 9, 2025.

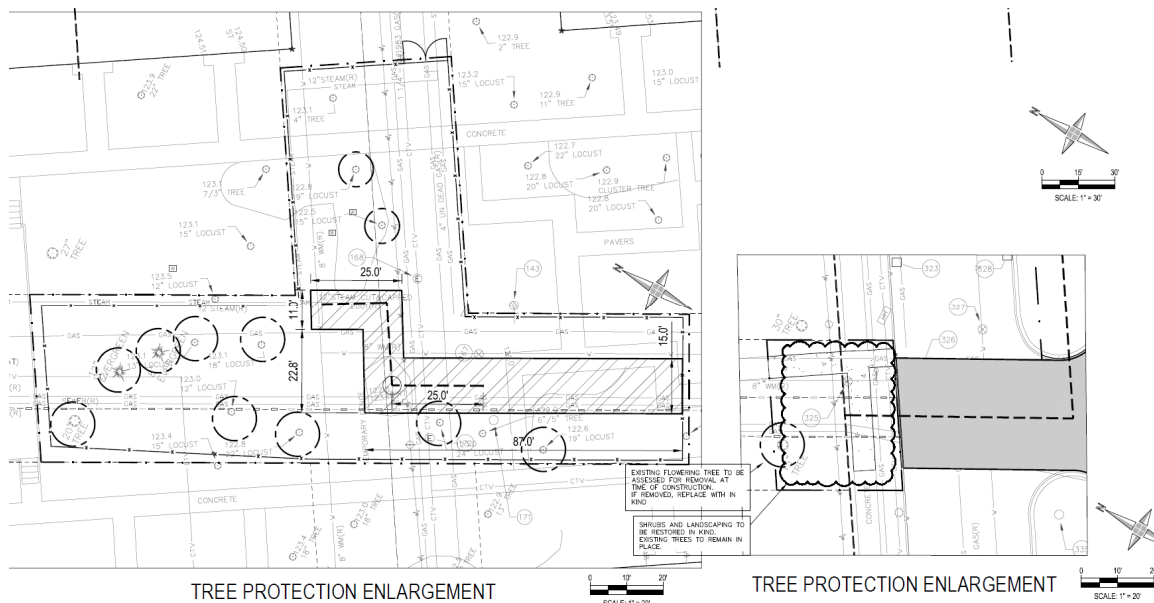


View to the south from within the area of disturbance, playground in mid-distance. Note large shrub specimens, including one in proposed area of excavation (marked by community members with red tape). Staff photo, May 9, 2025.



General view of "Old Macomb"-adjacent playground area showing vintage steel playground equipment, a concrete bench, and additional yellow and red taping posted by community members showing extent of work area. Note also the combination of multiple vertical layers of landscaping, from tree canopies to ground cover, that create the setting for the townhouses. Staff photo, May 9, 2025.

- Staff has observed severe damage to at least one yew and a nearby magnolia at the Old Macomb location, which was reportedly caused by initial survey efforts on site by the applicant's crew or contractors. It is not clear from the application materials if the proposed work anticipates a similar degree of damage, or if greater protection measures are proposed for these smaller but historically important contributing landscape elements. Tree protection measures are indicated in an enlarged plan contained in the drawing set, excerpted below:



Tree protection enlargements from submitted applicant materials.

- As a guide to the appropriateness of proposals, the Commission is always encouraged to examine the Elements of Design, which City Council has enshrined in the City Code as features of the district significant to its appearance. The Elements of Design for the Lafayette Park/Mies van der Rohe Historic District can be found in Section 21-2-181 of the City Code. The Commission can then decide which of these features have integrity today and should be treated as distinctive and historic character-defining features worthy of preservation during your application of the Secretary of the Interior's Standards, at either a district or resource level. Code language is given below in italics.

(1)Height. ...*The distribution of low-rise and high-rise buildings in the district generally follows the plan for the area developed by Mies van der Rohe, Ludwig Hilbersheimer, and Alfred Caldwell.*

- **HDC Staff analysis:** Notable is the inclusion of Alfred Caldwell, the landscape architect, in this Element. The combination of an architect, developer, planner, and landscape architect is also discussed in the designation report and excerpted above. The Commission, in staff's opinion, should consider the potentially reduced *height* of the plant canopy, after expected damage and "replacement-in-kind" with new plantings, as a factor in their analysis. The visual impact on the landscaping mass and size should carry as much importance as a reduction in mass and size on the buildings themselves. This Element is failed.

(13)Relationship of significant landscape features and surface treatments. *The district is characterized by planned landscaping, generally created for each development. Landscaping is generally mature, and especially well developed in the Mies van der Rohe Townhouse developments. Paving exists as sidewalks and as parking lots, placed by plan in each development and open to view from public rights-of-way only at the shopping center. There is extensive use of grass turf lawn, which is the major landscape feature of the open space of the park.*

- **HDC Staff analysis:** As codified here in the City Code, the district is “characterized by planned landscaping, generally created for each development.” This excerpt is the strongest and clearest evidence that the landscaping in and around the townhouses shall be found to be significant and thus protected by the HDC to preserve the district’s character. Just as important is the City Council’s finding that the landscaping is “generally mature, and especially well developed in the Mies van der Rohe Townhouse developments.” The Commission is advised to recognize the special emphasis placed on the landscape’s historic character here, distinct from and integrated with the landmark buildings. This Element is failed by undetermined impacts to landscape features within the delineated disturbance areas.

*(14)Relationship of open space to structures. ... Each low-rise complex has its own arrangement of buildings in relation to open space, **designed as part of the complex**...*

- **HDC Staff analysis:** The integration of the landscape design with the architectural design is a distinctive historic and character-defining feature of the townhouse complex. As the proposal will potentially impact this design relationship, this Element is failed.

*(22)General environmental character. The general character of the Lafayette Park/Mies van der Rohe Historic District is that of a **substantially-intact planned community of the 1950s and 1960s**, with a very high level of architectural quality and substantial public amenities.*

- **HDC Staff analysis:** In this Element, the City Council recognizes perhaps the most extraordinary feature of the district, the fact that it has survived without modification or damage, as its designers envisioned it, for decades. In regulatory terms, this means that the district, and in particular the townhouse complexes, exhibit a high degree of historic integrity, i.e., that the existing elements preserve the original design intent and convey the significance of the district. Loss of, or damage to, even **some** of the mature landscape specimens would negatively affect this “substantially-intact planned community” in the same way that loss or damage to some of the buildings would clearly do. Reconstruction of a building would not recapture the authentic historic character, and neither would reconstruction of a historic mature landscape, even stipulating that such a step was possible, which is unlikely. This Element is failed.

- As reinforced above, the Elements of Design specifically codify the historic character and importance of **mature** landscaping, especially in the Mies van der Rohe townhouse developments. No proposal that destroys healthy and mature landscaping, and purports to replace it in-kind with smaller and newer plantings, should in staff’s opinion meet the Secretary of the Interior’s Standards or the district’s Elements of Design. The applicant has offered no professional landscape plan depicting plant restoration, nor evidence that such restoration would consist of full-grown specimens carefully matched to the existing plantings, and of identical size, stature, and health. It is a straightforward conclusion that the loss of even some of this mature landscaping, which would take decades to recover, would have a negative effect on the historic characteristics for which the City Council created this district in 2003, and for which the National Park Service has awarded the district National Historic Landmark status.
- Given the above analysis, it is therefore staff opinion that the proposal fails to meet the following Secretary of the Interior’s Standards (36 CFR 67.7), as the impacts on the character-defining landscape codified in the Elements of Design are unclear and potentially substantial:

(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.

(4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

(5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved

- National Park Service Guidelines derived from and complementary to the Secretary of the Interior's Standards are to be used by the Commission in their decision-making, per Section 21-2-72 of the City Code, and state statute. A key document for the preservation of historic landscapes is [Preservation Brief 36, Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes](#). In staff's opinion, the Caldwell landscape in the Lafayette Park/Mies van der Rohe historic district is a **Historic Designed Landscape**, which is defined in this NPS Brief as such:

a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturalist according to design principles...aesthetic values play a significant role in designed landscapes.

- Historic landscapes, per *Preservation Brief 36*, are character-defining features which individually or collectively contribute to the landscape's physical appearance as they have evolved over time. Additionally, plants "may have historical or botanical significance...a plant may have been associated with a historic figure or event or be part of a **notable landscape design**. A plant may be an uncommon cultivar, exceptional in size, age, rare and commercially unavailable. If such plants are lost, there would be a **loss of historic integrity** and biological diversity of the cultural landscape." [emphasis by staff]
- The existing utility runs within the district, including the north/south segment between Antietam and East Lafayette along former Russell Street, predate the historic district. Staff also understands that steam service via this infrastructure was provided to at least some of the Mies townhouse buildings until approximately the early 1980s (i.e., the first 20 years), when it was disconnected. It is unclear if such infrastructure could once again be available to the townhouses or other nearby buildings if completed.
- Concerning the two steam stacks, staff notes that they are now proposed adjacent to parking areas terminating Nicolet and Joliet Place. It is noted that separation of the residential uses from the "mechanical" intrusions of cars and streets (and their associated visual impact) was (and is) a key feature of this resource. These parking areas already incorporate minor infrastructural elements including parking gate activators and bollards. According to the engineer, steam stacks built to current standards emit steam only rarely as they do not operate under the same conditions found elsewhere (e.g., along downtown streets), and are not a heat hazard. If the Commission decides that the steam stack impact is minor *in the context of the parking areas*, staff suggests that more study may yield an acceptable hidden location in the landscape immediately adjacent to these parking areas.
- Based on the above, it is staff's guidance to the Commission that the landscape in its fully developed current and mature form is a distinctive and highly significant character-defining feature of the district. This landscape is not limited to the honey locust trees alone, but fully includes the critically important understory of mature ornamental specimens, and also the lower growing ferns and assorted ground cover, including areas of turf lawn. All of these landscape elements work together in composition to provide the aesthetic and purposeful design intent imagined by the initial designers, and protected by City Council. Only turf lawn can be easily restored "in-kind," in staff's opinion.

NOTICE TO PROCEED ANALYSIS

- A Notice-to-Proceed (NTP) is an alternate approval path available to the Commission for historically inappropriate work. None of the Elements, nor the Secretary of the Interior's Standards, need to be satisfied; however, the Commission in other cases has compelled the *most* appropriate and sensitive design feasible as a factor in its decision-making around "substantial community benefit." An alternate set of conditions, codified in Section 21-2-75, are prescribed by state law and local ordinance, that being:

(1)The resource constitutes a hazard to the safety of the public or the occupants;

(2)The resource is a deterrent to a major improvement program that will be of substantial benefit to the community. Substantial benefit shall be found only if the applicant proposing the work has obtained all necessary planning and zoning approvals, financing, and environmental clearances, and the improvement program is otherwise feasible;

(3) Retention of the resource would cause undue financial hardship to the owner. Undue financial hardship shall be found only when a governmental action, an act of God, or other events beyond the owner's control created the hardship, and all feasible alternatives to eliminate the financial hardship, which may include offering the resource for sale at its fair market value or moving the resource to an appropriate vacant site within the historic district, have been attempted and exhausted by the owner;

(4) Retention of the resource would not be in the interest of the majority of the community.

- The Commission, per the state statute and local ordinance, has the exclusive right to determine for itself what constitutes a “major improvement program” and a “substantial community benefit” as required for inappropriate work by the second “prong” of Section 21-2-75 cited above. In addition to direct input from community members, the Commission has often relied on the input of the Planning and Development Department (PDD) or senior/elected city officials when considering what constitutes community benefit, as these entities are tasked with undertaking community engagement and tracking community needs and concerns.*
- There is no apparent limitation in the statute that the “community benefit” accrue to the residents of the historic district exclusively or completely. However, in the opinion of staff, while the work is clearly a “benefit” to the owners of 1300 East Lafayette, the statute’s sense of “community” defines and expects a positive impact on a more broadly defined community; indeed, this is the sense in which the Commission has previously defined “substantial community benefit.”

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ISSUES

- ***Indeterminate impact on mature landscape, including trees, shrubs, and other smaller plantings.*** The proposed work, via its wide impact area, imperils an vague portion of “mature landscaping,” including not only historic-age honey locust trees whose root systems will likely be impacted, but similarly aged dogwoods, yews, magnolias, redbuds and other smaller yet important specimens that are fundamental to the protected historic character of this district. No evidence is provided by the applicant that it is possible to replace such a unique and carefully cultivated set of plantings “in-kind.”
- ***Impact on other site elements, including playground, benches, and fence.*** The proposed work also impacts the playground at the heart of the townhouse development, which still consists of historic-age playground equipment and brutalist concrete benches of stark modern design that also contribute to the protected historic character of the district. Even the temporary removal of these features may cause them be damaged or lost, necessitating expensive and custom restoration of these elements. Contemporary replacement playground equipment and benches would look absurd in this formal and masterfully designed mid-century context, and would be highly inappropriate.

RECOMMENDATION

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 Lafayette Park/Mies van der Rohe 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 (4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Standard (5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved

And Elements of Design 1, 13, 14, and 22.

For the following reasons:

- The proposed work, via its wide impact area and lack of additional clarification in the submitted documents, has an indeterminate but substantial impact on distinctively character-defining “mature landscaping,” including not only historic-age honey locust trees whose root systems will likely be impacted, but similarly aged dogwoods, yews, magnolias, redbuds and other smaller yet important specimens and planted areas that are fundamental to the protected historic character of this district. No evidence is provided by the applicant that it is possible to replace such plantings “in-kind.”
- The proposed work also impacts at least some playground and fence elements, which consist of historic-age steel playground equipment, a steel fence at the proposed access location, and concrete benches of stark modern design that also contribute to the protected historic character of the district. Without strict monitoring and controls, temporary removal of these features may cause them be damaged or lost, necessitating expensive and custom restoration of these elements.