

**ADDRESS: CITYWIDE**

**APPLICATION NO: HDC2025-00699**

**HISTORIC DISTRICT: CITYWIDE**

**APPLICANT: GORDON PEARSON/CITY OF DETROIT HOUSING AND REVITALIZATION DEPARTMENT**

**DATE OF PROVISIONALLY COMPLETE APPLICATION: 1/21/2025**

**SCOPE: REPLACE 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, \$346,864,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funding to support long-term recovery efforts following record storm events which occurred in August 2023. Using this funding, the City established its Alley Sewer Repair Program (ASRP), which will provide repairs and upgrades to the City's sewerage system within the public right-of-way. 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) and will be deployed city wide to address needed repairs of the city's aging sewer lines.

### **STAFF OBSERVATIONS AND RESEARCH**

- The application covers work which will be funded and undertaken by the City of Detroit
- See the submitted maps, which outline the locations within local historic district which are subject to this program [Figure - Historic Districts with Footer-compressed.pdf](#). Please note that these locations are provisional and are subject to change
- As the project will involve a large number of sites across the city, the applicant is seeking a programmatic Certificate of Appropriateness for ASRP 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 and address long standing performance issues associated with the city's aging sewerage system, namely sinkholes within public alleyways.
- 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.
- The Commission approved a similar, city-wide application which was submitted by the City of Detroit/HRD for review at the February 2025 regular meeting. In that case, the project scope was confined to the replacement of sewerage infrastructure on private property. As of the date of this report's completion, staff is unaware of any work associated with the 2025 approval that has been undertaken in a manner which does not comply with the Commission's COA/does not meet the Standards.
- The program will have no above-grade impact on building exteriors

- Much of the exterior work associated with the program will involve ground disturbing activities (i.e., excavation) related to the repair/replacement of sewer lines in alleys/public right-of-way, installation of associated equipment, and work related to the restoration of the impacted sites. As the existing sewer equipment itself is not significant, its repair or replacement will not detract from historic districts. However, the associated sitework does have the potential to impact areas within the public right-of-way and where the work ties into sewerage infrastructure within private property. 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 does note that the replacement of mature/historic landscape features damaged/required for removal by the project with the same species is possible under the current program. However, any new replacement plantings will not replicate the scale, character, and age of the mature plantings. Therefore, it is staff's opinion that this work specific work item should be reviewed on a case-by-case basis by the Commission according to their regular application process. Similarly, while the program will propose an in-kind replacement of standard fencing, sidewalks, curbs, gutters, and roadway pavement as described above, historic districts do include a range of "non-standard" historic, character-defining fencing, walls, and hardscape which, if impacted by the project, will not be replaced in kind by the city. It is therefore staff's opinion that work which will not result in the in-kind replacement of historic, character defining fencing, walls, and hardscape 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
- Staff notes that the primary area of the project's impact will be public alleyways. As such, the project has the potential to impact historic-age hardscape/brick pavers which are currently extant within occasional alleys in local historic districts. Staff does not have a full accounting of all brick alleys within the city's local historic districts as these resources are not consistently documented or addressed during the historic district designation process, but are documented in the Elements of Design for certain districts. However, it is staff's opinion that remaining brick alleys do have the potential to contribute to the historic character of local historic districts and therefore any work which might impact these resources must meet the Standards, which in this case would require the following:
  - Where work shall be undertaken within brick alleys in historic districts, the brick within the affected project area should be salvaged if possible and re-installed upon the restoration of the project area

- Where existing brick is deteriorated to an extent that it cannot be salvaged and reinstalled and/or if new brick is necessary, the new brick should match the existing as closely as possible.
- Staff does note that the current project scope does speak to the “...surface restoration of pavement.” However, the application does not specifically state how the work will address the replacement of brick pavers which might be impacted by the project. In cases where the project will impact existing brick alleys, staff recommends that the Commission issue a programmatic approval only when the existing brick can be salvaged and reinstalled. In cases where the city determines that new brick and or a different material must be installed in existing brick alleys under the current program, it is HDC staff’s opinion that a new application should be submitted to the HDC for review according to their regular process.



**Historic brick alley, located within the Cass Henry Historic District. Photo by HDC staff. Facing northeast**



**Historic brick alley, located within the Brush Park Historic District. Photo by HDC staff. Facing west**



**Historic brick alley, located within Hubbard Farms Historic District, Behind 355 W. Grand Boulevard. Photo by HDC staff, facing northeast**

- Staff concludes that the proposed repair/replacement of sewer lines 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
  - The removal/replacement of brick pavers in alleys
  - The removal of fencing, walls, and hardscape which the program will not replace in kind

## ISSUES

- Significant landscape features which might be damaged as a result of the project cannot be replaced with new landscaping that replicates the original in scale and character.
- Areas of “non-standard” historic fencing, walls and hardscape, to include brick alleyway pavers which might be damaged/destroyed by the project not proposed to be replaced in kind by the current project

## 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 Elements of Design within affected historic districts, with the condition that:

- 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 city 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.
- If the project will damage or require the removal of any historic/significant landscape 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 project will impact historic hardscape elements, to include brick pavers, stone curbs, etc. such elements shall be salvaged and reinstalled upon the restoration of the site if possible. If salvage is not possible and new hardscape is required, 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