



**PLANNING AND
DEVELOPMENT DEPARTMENT**

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SR-2 – ADVISORY STAFF REPORT (03-06-2026)

This advisory report, prepared by staff, represents the opinion and advice of professional staff, and does not represent nor direct the separate review and decision of the Historic District Commission. This report serves as an addendum to SR-1, an objective staff summary of the proposal and property.

ADDRESS: 465 W MIWAUKEE (AKA 460 W BALTIMORE)

MEETING DATE: 03-11-2026

APPLICATION NUMBER: HDC2025-00731

ADVISORY STAFF REPORT PREPARED BY: E. THACKERY

SCOPE: REMOVE FIRE ESCAPES

STAFF OBJECTIONS TO APPROVAL:

This first section describes itemized conclusions/concerns, which, in staff's professional opinion, would prevent the issue of an unconditional Certificate of Appropriateness (COA). "None" means staff has no objections and believes a COA is warranted, with no conditions. The Historic District Commission is not required to accept staff opinions or recommendations.

1. The original fire escapes are distinctive, historic, character-defining features that date to the resource's original construction.
2. The proposal, which seeks to remove the original fire escapes from the building, does not demonstrate that the historically distinctive, character-defining fire escapes are beyond reasonable repair.
3. Standard 2 requires that the removal of historic materials, like the historic fire escapes in this case, will be avoided.
4. Standard 5 requires that distinctive features that characterize a property, like these fire escapes, will be preserved.
5. Standard 6 requires that if a historic feature is deteriorated beyond repair, the distinctive feature, like the fire escapes, will be replaced with a new feature that matches the old in design, color, texture, and, where possible, materials.
6. The proposal stated that the continued presence of the fire escapes poses a fall hazard and a potential liability, but did not provide any data or reports to support that claim.

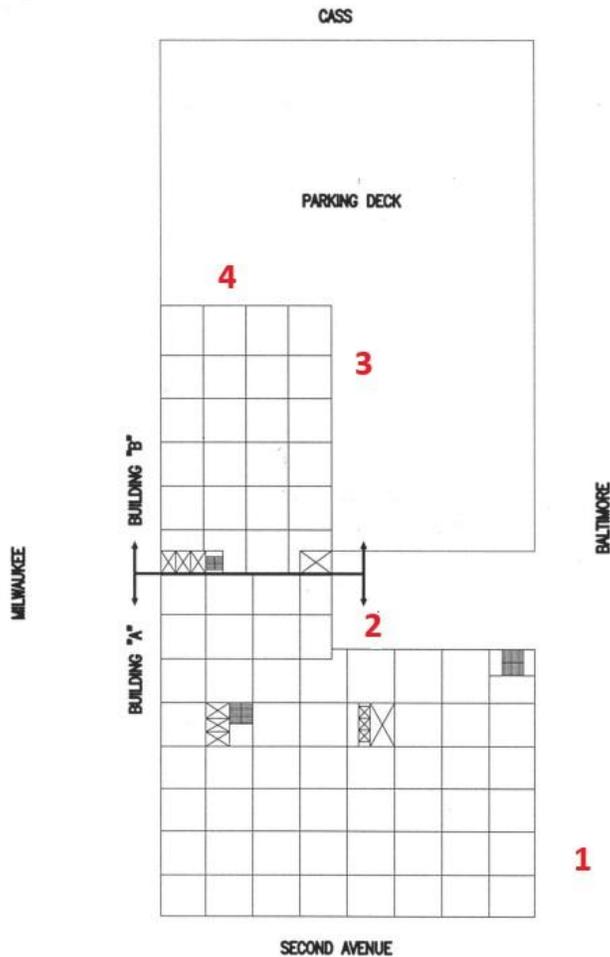
STAFF ANALYSIS AND DISCUSSION:

This second section expands on the reasoning and analysis leading to staff's conclusions given in the first section above. The Historic District Commission is not required to accept staff opinions or recommendations.

The General Motors Research Laboratory Building is also known as the Argonaut Building. It occupies almost the entire city block, bounded by between Milwaukee, Baltimore, Second,

and Cass. It has had several addresses.

- It was built in two phases: Building A was built in 1928 at what was known as 421 Second Avenue and Building B was built in 1936 at what was known as 485 W Milwaukee.
- It was listed on the National Register of Historic Places in 2005 and established as a single-resource local historic district in 2006.
- This application's proposed scope of work is the removal of four metal fire escapes. They are located on the Baltimore and Cass sides of the building.



The approximate locations of the fire escapes are shown.. This black-and-white diagram was included in the National Register nomination for the building, and the parking deck pictured has since been demolished. Staff added the red fire escape labels.



Fire escape on Baltimore near Second, labeled as #1 in the diagram above. (Staff photo, February 2026)



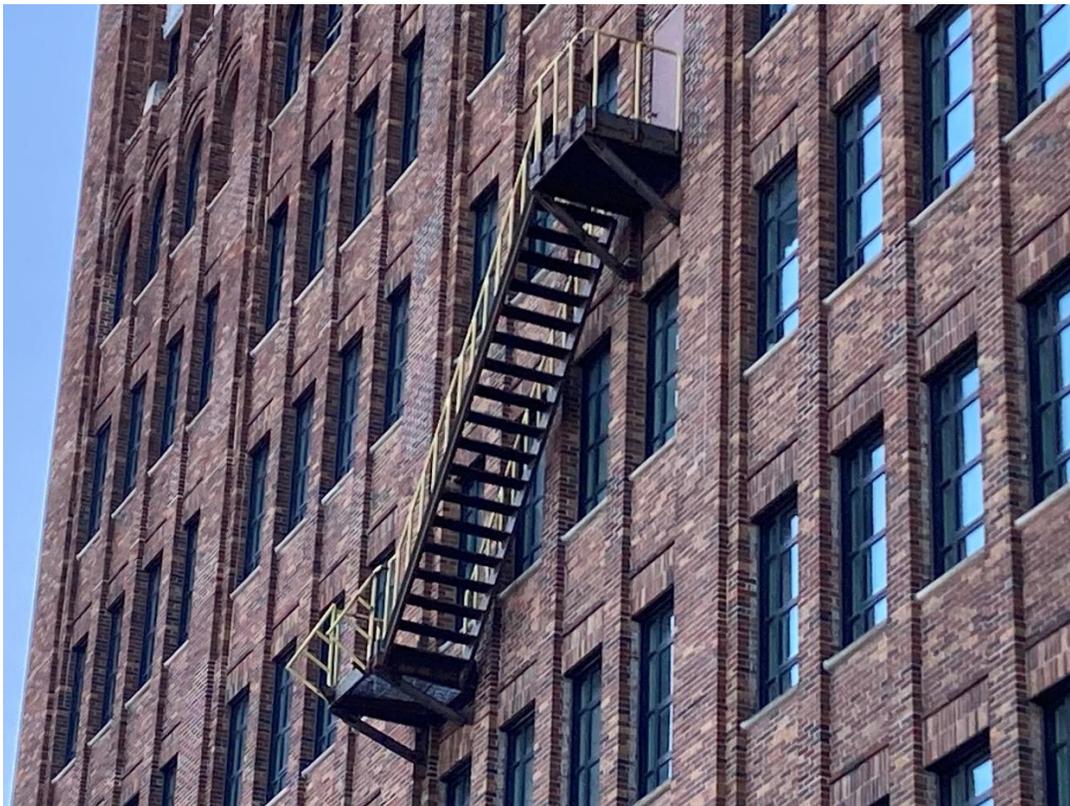
Fire escape on Baltimore, labeled as #2 in the diagram above. (Staff photo, February 2026)



Fire escape on Baltimore, labeled as #3 in the diagram above. (Staff photo, February 2026)



Fire escape on Cass, labeled as #4 in the diagram above. (Staff photo, February 2026)



Detail, fire escape on Cass, labeled as #4 in the diagram above. (Staff photo, February 2026)

According to the National Register nomination (downloadable at <https://catalog.archives.gov/id/25341156>), the fire escapes are original to the building, but the doors associated with the escapes are not original. The nomination and the local district designation report both document the fire escapes' existence, but neither provides additional detail about the escapes. The District's Elements of Design notably mention the fire escapes, indicating that they are significant to the appearance of this single-building district. Design Element 7 states, "*Relationship of materials.* The front (east) and south façades are brick and limestone with a polished granite base. Window sashes and frames are bronze anodized aluminum, as are pedestrian doors. There are shallow metal elements above the ground floor windows and metal fire escapes on the south elevations." In the City's Planning and Development Department's files, associated with the 2008 building rehabilitation are notes from a meeting that state, "Some sections of fire escapes will be retained for historic appearances only." (The notes go on to document that fire safety measures will no longer rely on these escapes.)

The 2008 rehabilitation of the building was a tax credit project, but the tax credit-related documents are no longer available in the State Historic Preservation Office. When HDC staff inquired about the fire escapes and whether they would have been considered historic features of the building at the time of the rehabilitation, SHPO staff confirmed that because the fire escapes are original to the building, it is likely that the National Park Service considered them historic and significant and they would have been required to remain on the building as part of the tax credit project.

This evaluation is similar to New York City's Landmark Preservation Commission's evaluation process regarding fire escapes. (See https://www.nyc.gov/assets/lpc/downloads/pdf/LPCPermitGuidebook_Chapter13_FireEscapes.pdf .) Their process is to determine whether the fire escape in question is original to the building, and/or whether the fire escape is located on a building within a historic district where fire escapes contribute to the special architectural and historic character. They also consider whether the fire escape in question has decorative qualities—some fire escapes have detailing that is intended to complement the building where they are located.

The fire escapes on this building have a distinctive design—three of the four have "X"-shaped guardrails on the landings and simple vertical balusters on the stairs. They are painted to stand out against the building and they are unusual in their placement in that they span floors, but don't reach roofs or the ground. They are original to the building and prominent. Staff considers the fire escapes on this building to be historic and character defining.

The Secretary of the Interior's Standards for Rehabilitation prioritize preserving historic and character-defining features on buildings.

STAFF RECOMMENDATION:

This third and final section takes staff's itemized "objections" identified in the first section, and presents them in the form of "conditions" in support of a proposed approval recommendation or "reasons" in support of a proposed denial recommendation, in the form required by Section 21-2-78 of the City Code. The Historic District Commission is not required to accept staff opinions or recommendations.

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 General Motors Research Laboratory/Argonaut Building 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 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*
- *Standard 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.*

- Element of Design 7

For the following reasons:

1. The original fire escapes are distinctive, historic, character-defining features that date to the resource's original construction.
2. The proposal, which seeks to remove the original fire escapes from the building, does not demonstrate that the historically distinctive, character-defining fire escapes are beyond reasonable repair.
3. Standard 2 requires that the removal of historic materials, like the historic fire escapes in this case, will be avoided.
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5. Standard 6 requires that if a historic feature is deteriorated beyond repair, the distinctive feature, like these fire escapes, will be replaced with a new feature that matches the old in design, color, texture, and, where possible, materials.
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