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May 17, 2023

**Via Email to:**

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Conrad L. Mallett  
Tamara York Cook  
City of Detroit  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226

**Re: The City of Detroit v Urban Renewal Initiative Foundation  
Case No. 2023-004376-CH**

Dear Mr. Mallett & Ms. Cook:

I am writing on behalf of my client, Urban Renewal Initiative Foundation (“URIF”) which, as you know, owns the property at 14927 E. Jefferson Avenue, Grosse Pointe Park, Michigan, and the abandoned DPW building situated on the parcel (referenced as “Bldg 101” in Exhibit A, Parcel Viewer, attached hereto). The building on the property straddles the border of Grosse Pointe Park and the city of Detroit. As you are further aware, the city of Detroit has placed a “Stop Work” order on the property, which effectively prevents URIF from demolishing the abandoned DPW building; a building that our structural engineers and we believe constitutes an unsafe, hazardous, and attractive nuisance and presents a threat and potential harm to the safety and welfare of the public.

Over the last several weeks, we have been communicating with the city regarding the present lawsuit and what we believe may be a misunderstanding in terms of URIF’s rights to clear the site for future construction of The A. Paul and Carol C. Schaap Center for the Performing Arts and the Richard and Jane Manoogian Art Gallery (the “Project”). As you are well aware, the City of Detroit, Grosse Pointe Park, and URIF entered into a tripartite agreement in 2019 to develop land in and around the property where the abandoned DPW building now sits. This binding Memorandum of Understanding (“MOU”) between the parties requires that URIF “*position and construct the structure/building*” in “*substantial compliance with the Site Plan attached as Exhibit C to the MOU*” (the Site Plan is attached hereto as Exhibit B). URIF believes that it was fulfilling its contractual obligations to do just that when the city’s inspectors issued the “Stop Work” order halting demolition on site.

Nonetheless, the City’s actions constitute a larger threat to the public that we hope to avoid while we resolve the current misunderstanding between the parties in the lawsuit. As you know, URIF’s licensed structural engineer, John Sweda, PE, has concluded that the abandoned

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DPW building is “*an immediate danger and safety hazard*” due to the structural deficiencies described in his Report (Report attached hereto as Exhibit C). Mr. Sweda’s professional conclusions, as a licensed structural engineer, were based on his personal inspection of the building’s structural integrity and his years of practical experience. In addition, while the City may feel that it would be sufficient to brace the structure to prevent collapse of the building, this temporary measure is neither a permanent solution nor adequate to address the full measure of the safety concerns of this abandoned and deteriorating building. In point of fact, URIF’s project team has personally seen evidence of lewd and criminal conduct on the site, including vandalism, drug use, and immoral behavior. We believe the abandoned building continues to present an attractive nuisance to the public and constitutes a “dangerous building” within the City’s Ordinances. The only effective measure to mitigate these risks to the public is by demolishing the building.

It is also worth noting that, in addition to these present risks, it has always been contemplated by the City of Detroit that this building would be demolished as part of improving this site and constructing the Project. I believe this practical fact is undisputed, and the City’s refusal to allow this demolition to proceed is surprising under these circumstances. This is especially true since the City has made great strides in reducing blighted and abandoned buildings throughout the City, even filing lawsuits against property owners for failing to take appropriate steps to mitigate these risks to the public’s safety. Here, the property owner wants to proceed immediately with removing this hazardous site, as always contemplated by the parties.

Therefore, based on the conclusions and recommendations of Mr. Sweda in his Report, and given our hope that the Project will come to fruition in the future, we believe it would be appropriate to continue demolition of this abandoned building due to exigent circumstances; namely, that the structure is “unsound, unsafe, dangerous, ...” and meets the standard for immediate demolition as prescribed by Detroit’s ordinances. Not only is this building unsafe in its present abandoned condition, but it remains a blight to the area, and our hope is that the City has the same level of concern that we do to remove this dangerous condition.

Consequently, URIF is requesting a Notice of Emergency Ordered Demolition for the abandoned DPW building and clearing of the property of all debris. The URIF will continue to assume the cost of this demolition work, and we have crews ready to take immediate action. We look forward to your positive cooperation.

Very truly yours,



Mark V. Heusel

MVH:jkt  
Enclosures

4857-7338-4292 v1 [100256-1]

# **EXHIBIT A**



# Parcel Viewer



14927 E Jefferson



Search by: address

Parcel ID: 21000614.

Address: **14927 E JEFFERSON**

## Ownership

Taxpayer	CITY OF GROSSE POINTE PARK
Taxpayer Address	15115 E JEFFERSON AVE, GROSSE POINTE PARK, MI
Last Sale Date	February 28, 1991
Last Sale Price	\$153,750
PRE %	0

West, 42 feet of Bldg 102 to be demolished per engineer's report

## Usage & classification

Property Class	201 - COMMERCIAL
Property Use	-
Zoning	B4
# of Buildings	3
Total Floor Area (sf)	5052

## Taxation

Tax Status	EXEMPT (211.7M)
Assessed Value	\$0



# **EXHIBIT B**

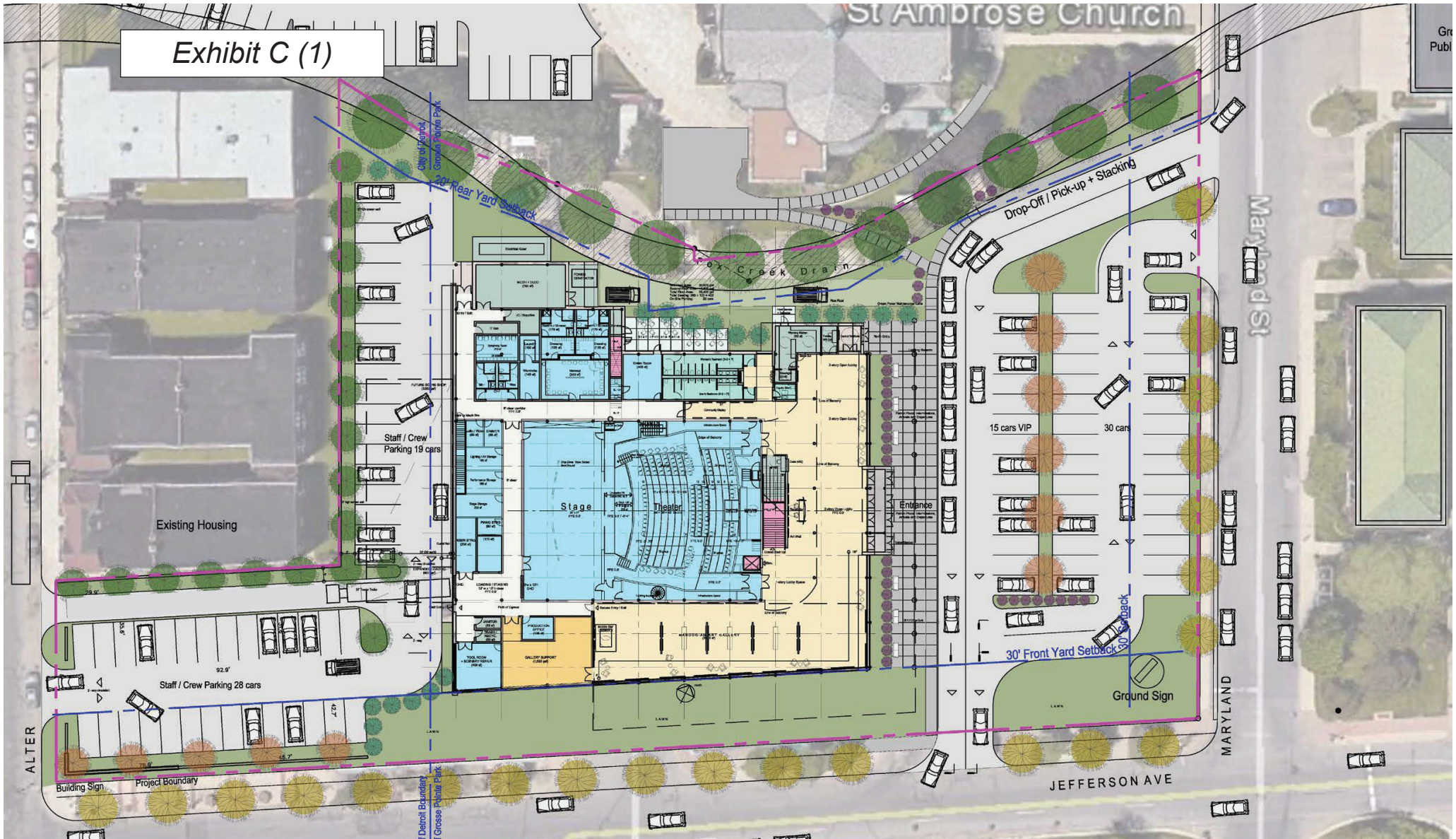


Exhibit C (1)

Exhibit C (2)



A. Paul and Carol C. Schaap Center for the Performing Arts and the Richard and Jane Manoogian Art Gallery

View of Building at Jefferson / Alter Intersection

Exhibit C (3)



A. Paul and Carol C. Schaap Center for the Performing Arts and the Richard and Jane Manoogian Art Gallery

View of Building Along Jefferson



# EXHIBIT C

Mr. John S. Sweda, P.E.  
574 E. Shore Drive  
Whitmore Lake, MI 48189-9444

Sheet 1 of 5

May 11, 2023

Mr. Kyle Knoll  
Vice President  
PCI-Dailey  
21717 Republic Ave  
Oak Park, MI 38237

RE: Water Department Building on East Jefferson  
Grosse Pointe Park DPW  
1005 Wayburn Street  
Grosse Pointe Park MI 48230

Kyle:

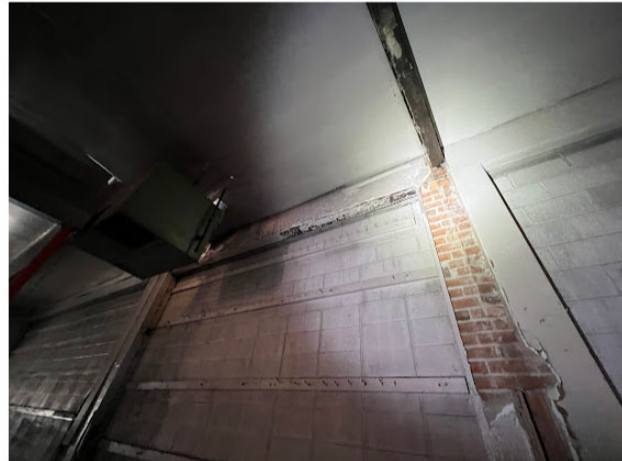
The Water Department Building on East Jefferson is a brick one-story garage facility, 93 feet in length by 48 feet in width. The roof height measured at the back of the building measures 15 feet.

The original brick walls are 3-wythe construction, and have no reinforcing steel. There are bond bricks every seventh course, on alternating sides, tying the bricks together.

The two sides facing East Jefferson and Wayburn Street originally had door openings for vehicles, and their exterior faces now have a combination of precast concrete panels with block, metal fascia covering the top half of wall and roof parapet. The original brick construction dates circa the period 1910 to 1920. The precast, block, metal fascia, and window infill most likely date from the 1980's as both an energy saving and security measure.



Exterior viewed from Wayburn entrance



Interior - precast concrete panel with block above

RE: Water Department Building on East Jefferson

Sheet 2 of 5

The other two sides of the building exhibit the original brick exterior, which has been painted. The upper walls at the side opposite East Jefferson originally had windows to admit natural light, and have all been infilled.



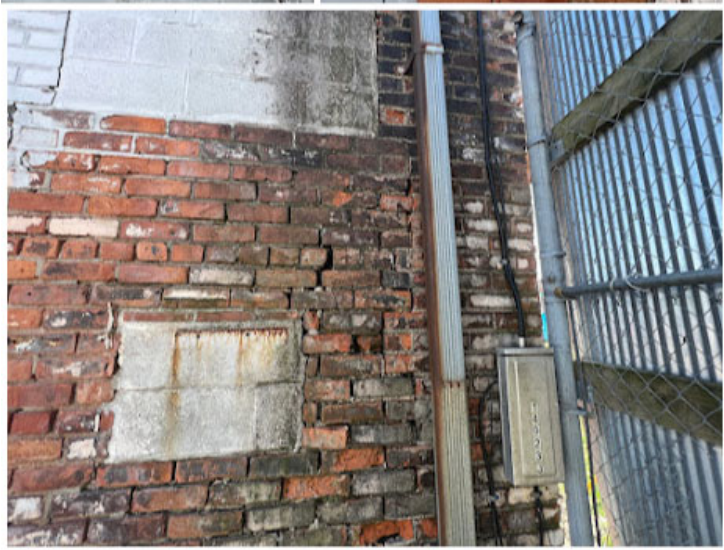
The lower half of the wall exhibits significantly more weathering and distress than the upper half.



RE: Water Department Building on East Jefferson

Sheet 3 of 5

The northwest corner of the building is in an advanced state of deterioration, with the west wall facing Alter pulling away from the rest of the building by 1 1/2 inch at the top corner of wall.



An interior view of this corner shows the roof joists are no longer bearing on the brick wall.



RE: Water Department Building on East Jefferson

Sheet 4 of 5

The west wall viewed from Alter Rd shows discoloration from water at the upper left corner and upper center.



Steel lintels over doors have significant rust, and would require further investigation and possible replacement.



Steel lintel angle - over door exterior



Steel lintel beam - over infilled vehicle door interior

RE: Water Department Building on East Jefferson

Sheet 5 of 5

**Structural Deficiencies**

- Critical Deficiencies
  - The most critical condition is the out-of-plumb brick wall on the side facing Alter Street.
  - Also, the roof joists at the northwest corner no longer bear on the wall.
- Serious Deficiencies
  - Wood roof framing (2x4 roof rafters and 2x10 ceiling joists) have water damage, most noticeable at a rooftop HVAC unit at the front of the building and in the northwest corner.
  - Brick exterior walls have deteriorated mortar joints and spalled brick.
  - Steel lintels over pedestrian doors and vehicle doors have severe rust.
- Minor Deficiencies
  - Concrete floor slab has sunk and is unlevel in several areas.

**Conclusions and Recommendations**

This building has suffered from a lack of proper maintenance over the years, leading to severe weathering and decay of its materials. As a result, the building now requires major repairs to ensure the safety of occupants and the public:

- The out-of-plumb west wall of the building needs to be taken down and rebuilt. This process involves shoring the roof, replacing rotted roof joists and decking boards as required, and installing new roofing adjacent to the rebuilt wall. Before any rebuild, the condition of the exposed wall foundation will need to be assessed, and made sound as required.
- Removal and replacement of any rotted roof joists, ceiling joists, deck boards, and new roofing at all leaking locations.
- Tuck pointing loose and missing mortar joints in the exterior brick walls, where evidence of failed mortar bonding is present.
- Replacement of all steel lintels, which involves shoring of roofs and/or walls.
- Removal and replacement of unlevel interior floor slabs as required.

An immediate danger and safety hazard exists at the wall facing Alter Street. Further shifting of the wall outward will cause additional roof joists to separate from the wall, eventually resulting in roof collapse, wall instability, and potential wall collapse.

Considering the extent of the damage and safety risks involved, it is my professional opinion that demolition should be considered as the most effective way and practical solution to address these structural hazards.

Respectfully submitted,

John S. Sweda, PE

