

From: Linda Berauer <lberauer@umich.edu>
Sent: Thursday, September 09, 2021 1:38 AM
To: HDC <HDC@a2gov.org>
Subject: 415 W Washington - SmithGroup proposal

Dear Commissioners,

I've lived on the OWS since 1986 and bought my OWS house in 1991, on Third St. between William and Jefferson. I have followed the interminable discussions the City has had on what to do with 415 W Washington for more than 20 years.

Decades ago, the HDC, after serious study, deemed that the 1925 main building, along with the Depression-era accessory structures associated with the Works Progress Administration, were contributing structures to the OWS Historic District. There have been wonderful concepts for restoration and reuse over the years, especially the expressions of interest by Kiwanis and the Arts Alliance to acquire the historic building for adaptive reuse. Most recently, a local engineer/builder, who happens to live in the OWS and did a wonderful job rehabbing the beautiful Moveable Feast historic building on Liberty at Second St., has developed a plan for adaptive reuse. His plan would restore many of the functions that were lost to the OWS when the old Tech Center with its artist studios was torn down for the new Y, and when South Main Market with its small food and grocery shops was torn down to build The Yard on South Main between Madison and Mosley.

It's sad that the City was unable to act on any of these ideas. Over the years, the structures have been allowed to decline. In 2015, the City allocated funds to make repairs, including to the roof, but those funds were never used. The structures have deteriorated, perhaps through simple indecision, or perhaps through not-so-benign neglect. The HDC would not allow a private homeowner to engage in "demolition by neglect," and it's hard to understand why the City should be able to do so. And so it was distressing that, finding the buildings in poor condition, the HDC recently gave permission for all the structures to be demolished. But approval to demolish is not a mandate to demolish. Recent engineering studies have determined the main building at least is still in fairly decent shape and can be restored and reused, albeit at a price.

History is baked into the building, our history, the history of the neighborhood, and the history of the City. This structure is not like the three-story cinder-block apartment buildings that line my block of Third Street and Second Street and gave birth to the movement to designate the OWS a historic district to save what was left.

In addition to the historic value of the current structure, there are other reasons not to approve the SmithGroup concept, including the fact that SmithGroup wants to put up an edifice that would cover the entire footprint of the flood fringe, despite the fact that best practices in sustainable building preclude new construction in any portion of the floodplain. And the City still speaks of affordable housing at this site, despite the fact that federal regulations do not allow federal subsidies for residential structures in any part of the floodplain so that Low-Income Housing Tax Credits can not be used, making the financials for including even a small portion of affordable housing here untenable. Our Affordable Housing Millage also does not allow the funds to be used for building housing in any part of the floodplain. The six-story, 150-unit development will be market-rate housing. I do not think we as a community should forego best sustainable building practices and demolish historical structures in a historic district for six stories with 150 units of market-rate housing that directly abut and loom over modest historic homes.

There are many hundreds of units of new housing in the pipeline in the downtown area just east of this site, and many hundreds of new units of market rate housing that have gone up recently on the edges of the OWS. There is no defensible reason to put one up within the historic district itself.

As the HDC, I understand your purview is not the sustainability of building in floodplains, or how much City coffers can be enriched by taxes on a large market-rate development. Your purview is to decide on whether this large development is consistent with Historic District guidelines. And this six-story large-footprint building is clearly not. According to the Secretary of Interior's guidelines, "Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the setting" is "**not recommended.**"

We don't want a wall between downtown and the OWS. We'd like a reasonable transition between the historic neighborhood and downtown. Adaptive reuse of the historic building, removal of the surface parking and it's conversion into green and open space that includes a sizable anchor park for the Treeline Trail in the Floodway and space for public amenities and pop-up activities in the flood fringe would accomplish this. The site has the potential to preserve historical and cultural legacy, maintain meaning and texture as a bridge between the historic neighborhood and downtown. Another bland edifice will not do this.

Please follow historic district guidelines and advise "the Developer" and its consultant, the SmithGroup, to forego putting any further time and effort into a plan that is not consistent with historic district guidelines.

Thank you for carefully considering this matter.

Respectfully,

Linda Berauer