

March 1, 2021

To the honorable Chair and Commissioners:

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The Milwaukee Preservation Alliance acknowledges the especially difficult question File 201370 presents to the Commission regarding the removal of significant stained glass windows. Ultimately, we would suggest that the current plan as proposed does not represent the best use for the property from a preservation standpoint and support Staff's recommendation to give "decisive weight" to criterion 320-21-12-a. If the application is granted, we suggest a compromise not unlike the Commission's decision in File 161669 strongly encouraging onsite display.

We acknowledge the challenges this building has experienced in finding a new use and understand that functional apartments must have clear windows to the outside, thus making leaving the windows in their current location untenable as the project is designed. However, this fact, combined with the proposal to diminish the integrity of the interior auditorium by subdividing the space (while strictly outside the purview of the Commission as an interior change) suggest a project that would likely not qualify for Historic Tax Credits and that alternative uses would be preferable. An alternative program maintaining the auditorium as performance space while creating apartments out of other interior spaces might allow tax credits to be utilized and assist with financing. Alternatively, a rearrangement of the floor plan may allow the current windows to remain by pairing them in rooms with existing clear windows or utilizing them in situations, like bathrooms, where lower light is acceptable.

Given the specific question of window removal before the Commission, MPA acknowledges and supports Staff's concerns and does not support a decision that sets a precedent for the acceptable removal and lack of in-kind replacement of windows that contribute to a property's significance. In its purest form, preservation practice does not support the removal of character-defining features. In addition, while the windows may not be original, we believe they have gained significance over time and are old enough themselves to be considered a historic feature of the building.

However, we would also argue that this significance is primarily as an interior feature. While the windows are a visually integral component of the building's interior, they do not appear to be a dramatic or character-defining feature from the exterior, with the primary difference from the outside – thanks to a similar muntin pattern – being the darker and more opaque nature of the glass panes relative to other windows on the building. The Commission acknowledged this in File 161669 when it stated, "The windows don't read well from the outside as they're very dark." It could be argued that replacing these windows to match the building's other existing windows does not dramatically alter the building's character from the street.

Nonetheless, it would be very difficult to argue that the stained glass windows are not a significant feature of the building closely tied in with its history and significance, as has been noted. Thus, if the Commission decides to grant removal, we would suggest, using whatever powers are available to it to compel or encourage such action, that a compromise be struck so that the windows could remain on site, potentially as an art installation in the building or by relocating to window openings where they would not make interior space unusable (i.e. bathroom, hallway, large room with additional clear windows, etc.). The Commission's previous decision in File 161669 sets some precedent for such a decision when it allowed windows to be moved and kept on exterior display. The possible later addition of the windows

might be a justification for allowing removal of the windows to facilitate such a compromise. Distinguishing fraternal buildings from religious buildings may provide an avenue to prevent the establishment of precedent for other situations where stained glass windows are present. If such a decision were reached, we support Staff's four conditions.

In short, MPA recognizes the difficulty of the question and suggests that:

1. Alternative uses or arrangements would be more compatible with preservation of the significant features of the building and urge these to be thoroughly explored first.
2. If such alternatives are determined not to be feasible or prudent, a compromise might be reached that allows the proposed use to rehabilitate the building while requiring to the extent possible that all stained glass windows remain on the premises on display.

Thank you as always for your hard work on behalf of the people and places of Milwaukee.

Respectfully,

Jeremy Ebersole
Executive Director
Milwaukee Preservation Alliance