

November 23, 2022

To the honorable chair and commissioners:

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The Milwaukee Preservation Alliance encourages the Commission to reject the proposed demolition of the historically significant building at 1101 W. Historic Mitchell St., which is a contributing property to both a local and National Register historic district. To demolish the building, which according to city assessment records has stood sentinel over the important commercial thoroughfare since 1891, would set an untenable precedent that would be counter to the aims of the City's preservation ordinance declaring that the "use of improvements of special architectural character or special historical interest or value is a public necessity and is required in the interest of health, prosperity, safety, and welfare of the people" (320-21-1).

While we appreciate the applicant's intention to spur economic growth and provide important services to the neighborhood as well as their efforts to nod to the district's historic character in new construction, the proposed demolition nevertheless does not meet the criteria established under 320-21-11-h for the demolition of a historic structure. We urge the commission to consider section h-2: "Whether the structure, although not itself an individually-designated historic structure, contributes to the distinctive architectural or historic character of the district as a whole and should be preserved for the benefit of the people of the city." While such would by definition be the case with most properties within a local historic district, it is certainly the case here, as the large building commands a strong presence within the district, and its loss would significantly alter the district's character. Further, it is worth noting that the historic character of this district is so noteworthy and essential to the area that the official name of the street itself, Historic Mitchell Street, includes "historic" in its name. Here especially, demolitions which could affect an area so intimately tied to its history much be considered with special care.

Additionally, the applicant's proposal notes the condition of the building, leaning on section 320-21-11-h-6 criterion to justify demolition: "Whether the structure is in such a deteriorated condition that it is not structurally or economically feasible to preserve, restore or use it, provided that any hardship or difficulty claimed by the owner which is self-created or a result of demolition by neglect cannot qualify as a basis for the issuance of a certificate of appropriateness." However, no verification by a qualified contractor with experience in historic buildings regarding the claimed "dilapidated" condition of the building or its inability to be

restored accompanies the proposal. For this criterion to be met, conclusive evidence that rehabilitation has been thoroughly explored and determined infeasible and that this condition was not self-created would be necessary.

We would suggest that many preservation options exist for the property that allow the applicant's intention to be met, including new construction above or behind the current building or on adjacent vacant lots. Historic Tax Credits would also be available to lessen the financial burden of restoration.

Finally, it is important to consider the precedent that would be set by allowing for the demolition of a building both locally and nationally designated for its historic significance. To allow the demolition would send an unfortunate message regarding the value and importance of properties determined through public process to "reflect elements of the city's cultural, social, economic, political and architectural history" (320-21-1-a) and run counter to the purpose of the ordinance to "Safeguard the city's historic and cultural heritage, as embodied and reflected in landmarks and historic districts" (320-21-1-b). For these reasons, we encourage the commission to reject the proposed demolition.

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

Respectfully,

Jeremy Ebersole
Executive Director
Milwaukee Preservation Alliance