



HPC 100877

Historic Architecture • Preservation Education • Local History

November 15, 2010

Ms. Ann Pieper-Eisenbrown, Chair
Historic Preservation Commission
200 East Wells Street, Room 301-B
Milwaukee, WI 53202

Dear Ms. Pieper-Eisenbrown:

Re: File No. 100877
Marriot Milwaukee Proposal

This letter is in reference to the above captioned file regarding the application of Wave Development LLC ("WDL") to the City of Milwaukee's Historic Preservation Commission ("HPC") for a certificate of appropriateness ("COA") to demolish five buildings designated as part of the East Side Commercial Historic District and located at 327 East Wisconsin Avenue, 319-325 East Wisconsin Avenue, 629-631 North Milwaukee Street, 627 North Milwaukee Street, and 625 North Milwaukee Street.

On behalf of Historic Milwaukee, Inc., I would like to express our organization's opposition to the granting of the requested COA. This decision was not arrived at lightly and was made only after a careful review of WDL's application and plans, the Guidelines for Preservation provided in the Study Report for the East Side Commercial Historic District, the City's Historic Preservation Ordinance, and the Downtown Plan. I want to emphasize that HMI supports investment in downtown and believes we should actively build out Milwaukee and garner tax revenue from new development on available open spaces. HMI also wants to thank WDL for its desire to invest in Milwaukee and for generously taking the time to meet with us to answer our questions and walk us through its application.

Analysis of WDL's Application

The Study Report for the East Side Commercial District provides in Section X(D) six Guidelines for Demolition that HPC must consider when considering whether to approve demolition in the District. In addition, Section X(D) states that demolition in the District "is not encouraged and is generally not permissible." Based on that language, HMI reviewed WDL's application and plans with the understanding that there is a general presumption against demolition in the historic district. We therefore begin with the premise that it takes an unusual or unique situation for HPC to approve the demolition of a building in the district.

WDL's application does not specifically address any of the 6 Guidelines for Demolition. Instead, the application for a COA to raze 5 buildings within the district is based on the following argument:

- (1) Section X(D)(6) of the Study Report provides (as 1 of 6 guidelines HPC must consider) that *"consideration will be given to whether or not the building is to be replaced by a building that would fulfill the same aesthetic function in the district as the old structure (See New Construction Guidelines)"*; and
- (2) The proposed Marriot Project meets the New Construction Guidelines provided in Section X(C) of the Study Report.

While an argument may be made that the proposed Marriot Project meets the New Construction Guidelines, it does not logically follow that meeting the New Construction Guidelines alone equates to fulfilling "the same aesthetic function in the district" as the five buildings sought to be demolished. If that were correct, all that would be required to demolish a building in a historic district is to replace it with an entirely new structure of similar scale and of like-materials currently found in the district. This rather low standard is in conflict with the Study Report's general presumption against demolition. WDL's application



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provides no analysis for how meeting the New Construction Guidelines alone meets the "same aesthetic function" standard and provides no examples of HPC previously interpreting Section X(D)(6) in such a manner.

Conclusion

In our opinion, given the general presumption against demolition found in the Study Report and the City Code, the standard for fulfilling "the same aesthetic function in the district" is an extremely difficult one to meet – for good reason. We as a community have determined through a legislative process of passing a historic preservation code, designating a historic district, and adopting a Study Report of that district, that these buildings are a valuable piece of our City's history and heritage.

Therefore, we respectfully submit, that the aesthetic function of the district cannot be met by replacing a piece of our history with a building that could be found in any city. The built landscape in this district affects the identity and perceptions of Milwaukee, and therefore our economic future. Development must take this into consideration. East Wisconsin Avenue and North Milwaukee Street serve very important aesthetic functions, which are more than the material and dimensions of buildings. People must know they are in Milwaukee when they see this block. As currently submitted, WDL's proposal does not meet these high standards. Therefore, we respectfully submit that we do not support a Certificate of Appropriateness for File 100877.

Sincerely,

A handwritten signature in black ink, appearing to read "Anna Marie Opgenorth", written in a cursive style.

Anna-Marie Opgenorth
Executive Director
Historic Milwaukee, Inc.

cc: Evan Zeppos, Spokesman for Wave Development LLC