

To: Milwaukee Historic Preservation Commission
Re: Request to defer COA for 229 E. Wisconsin Avenue Mural
From: Zachary Lifton, M.S. Historic Preservation, Columbia University

Commissioners Bauman, Clendenen-Acosta, Jarosz, Peltz, Pieper-Eisenbrown and Kahn [abstaining]:

I am writing today, as a fellow preservationist, to respectfully urge you to defer granting a COA for the mural at 229 E. Wisconsin Avenue. This COA request has now emerged as a complex one on several levels, and only further flags the need for comprehensive mural policy and management across city boards: yours being only one.

I would strongly suggest reviewing, *Managing Community Murals in an Urban Preservation Framework*, a 2019 study coming out of UPenn's Historic Preservation Program. I will include it as an official submission along with this letter. It states:

As murals increasingly appear in cities across the country, almost no guidelines exist for their management and care nor their relationship with existing cultural resource management practices. This thesis examines how community mural programs interact with other public and private entities to achieve preservation-oriented management practices.

As for this specific instance and COA request here in Milwaukee, I write from a unique place of experience and understanding. My background is in both arts management and preservation practice: my passion is how the two interact. I am a local historic/arts business owner, and close colleagues with Milwaukee muralists I admire. I believe in the beautification and civic pride these works can bring to a neighborhood and city as a whole.

With a Masters Degree in Historic Preservation from Columbia University, however, I also write with a vast understanding and appreciation for the field itself: the complex visions, frameworks, and nuances involved, including your roles and the standards of practice you must adhere to.

All of the above is why I am writing with a collegial reminder of your important—yet hyper-focused—role in what has now become the broad, contentious issue of the mural being proposed on The Railway Exchange Building. I again urge for a deferment to allow more time for your commission to carefully consider this COA request as guardians of the East Side Commercial Historic District.

I fear the project is a tempting one to quickly approve for a host of reasons *outside of the scope of the preservation commission*. The request is one that involves not only “supporting the arts,” but the tempting sparkle of Shepard Fairey’s fame, the pull of increased tourism, a powerful message about voting, and—to be frank—the increased desire to approve a project involving a building owned by one of your team, Ms. Patricia Keating Kahn.

None of these reasons are, however, indicators that the COA should be granted.

They are, in fact, the exact opposite: all cause for extra care and scrutiny. It is the job of the HPC to assess appropriateness based on your regulatory duties and to do so even in the face of the low-hanging fruits of fame, funding, and owner-benefit. This is exactly why the preservation process exists: your duty now is to put Mr. Fairey’s notoriety and Ms. Kahn’s familiarity 100% aside. I am writing to remind you of this.

As commissioners, you are not tasked with assessing the value of a public art piece, nor the process by which it was decided upon—no matter how many arts organizations, big funders, or staff in Madison approve. You are not art critics, a tourism board, nor the deciders of political messaging. In your own bylaws it is stated plainly and simply:

The Commission’s concern in reviewing applications for a Certificate of Appropriateness is the preservation and enhancement of those features that caused the site, structure or area to be designated.

When reviewing this COA request, I urge the commission to uphold this duty by focusing on assessing this mural as a modern insertion into a Nationally recognized historic district—just as you would any other insertion of this scale.

To do so it is thus imperative to first understand why the East Side Commercial Historic District was designated by your predecessors in the first place. To simplify, the designation report touts this district for three main reasons:

- 1) The collection of distinct commercial architecture bracketed in the period of 1854 to 1900 is unique downtown.
- 2) The visual cohesiveness of these structures together, as a whole, is impactful within a tightly-bounded area, and
- 3) The distinctness of the district from the much more modern areas that immediately surround it helps separately preserve these decades of architectural language.

Stripping away the pomp and circumstance of Fairey’s mural, the HPC is simply tasked with asking whether the proposed project is appropriate when it comes to the *preservation and enhancement of [these] features* as listed above.

This COA involves a 12-story modern insertion by a 21st Century creator on a wall that massively out-scales its neighbors in height. It is an insertion in which the sole purpose is to be visually impactful. While the focus has been on the building itself, this is a mistake: the HPC’s role is to assess impact on the district as a whole. 229 E. Wisconsin Avenue is one of the northern-most buildings in the East Side Commercial Historic District meaning its southern wall (the proposed mural location) faces the vast majority of the other 44 Nationally-Registered buildings around it.

Again, as a collegial reminder, I urge you to ask the questions you are tasked to investigate in these instances by your own code of ordinances (section 320-21). Items such as:

- **Is the project “sensitive to the mass and proportions of existing structures on the site or within the district in which the subject property is located?”**

- **Does the proposed work “adversely affect the external appearance of other improvements on the site or within the district?”**
 - **Does the project “conform to the objectives of the historic preservation plan for the district as duly adopted by the common council?”**
 - **Are we remembering that, “Alterations that have no historical basis and which seek to create an earlier or later appearance shall be discouraged?”**
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I’d like to respectfully propose a thought experiment to the commission given all of the above and ask the board to contemplate whether a 21st Century-*anything* of this scale, on that particular wall, is appropriate.

Meaning, in a district that is specifically designated for, 1) its bracketed age range prior to 1900, 2) its visual cohesiveness due this age bracket, and 3) its distinctness from the modern downtown that has arisen around it: is a large-scale modern addition that is purposefully meant to be visually impactful in keeping with this district’s character?

More specifically, the thought experiment would be:

- **If a COA was requested to cover that entire wall with vinyl siding, would that COA be granted? (or)**
- **A COA request for a modern, glass, exterior elevator shaft up that wall?**
- **If a COA request came in to put up a 12-story modern billboard on that wall to advertise modern products—how would this be reviewed?**

Essentially, as our city’s HPC you are commissioned to assess, sans-bias, foundational preservation questions, regardless of whether the modern insertion is siding or mechanicals or art or advertising. Will the proposed mural be in keeping with the mid-19th Century visuals, and distinct, non-modern grouping of this district’s 44 Nationally Registered buildings...

—or not?

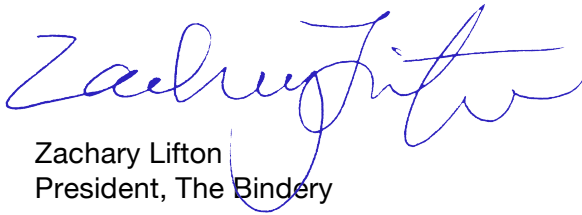
In summary, as further actions in this matter I urge you to:

- **Defer this COA request to allow time for further investigation and discussion.**
- **Much like other cities, work to develop overarching policy regarding how Milwaukee’s mural arts and historic preservation interact—with both each other and the community at large—before accidentally setting [or confirming] precedent with this particular case.**

- **Focus on your scope and duties to assess appropriateness using un-biased procedures (rather than assessing the art, artist, or messaging— all of which are outside your commission’s purview).**
 - **Consider the visual impact of this modern insertion across the district as a whole, rather than focusing on the building alone.**
 - **Consider this 21st Century insertion into a 19th Century district just as you would assess any other modern insertion.**
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I thank you for your time in reviewing this letter—and thank you, in general, for the hard work you each do to keep Milwaukee vibrant and humming with the historic character we all adore.

With great collegial respect,



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President, The Bindery

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Included as part of official submission:

Back, Margaret, "Managing Community Murals in an Urban Preservation Framework" (2019).
Theses (Historic Preservation). https://repository.upenn.edu/hp_theses/683