

June 2, 2022

To the honorable Chair and Commissioners:

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The Milwaukee Preservation Alliance urges thoughtful consideration of the request for a COA for the demolition and reconstruction of the Edmund Gustorf Boat House Lighthouse. If the commission grants the request, we encourage it to be done with conditions including the reuse of all usable original materials and the use of approved materials that are in-kind or following the Guidelines for Rehabilitation in 320-21-12-f: "If replacement is necessary, the new material shall match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features shall be based on accurate duplications of features, substantiated by historic, physical or pictorial evidence rather than on conjectural designs or the availability of different elements from other buildings or structures."

If the COA is granted, we would urge the commission to make explicit that the approval is for a rehabilitation under 320-21-3-j: "improving property through repair or alteration, making possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural and cultural values." The decision would then be made under 320-21-11-g, "Certificates to Allow Alteration, Reconstruction, Rehabilitation or New Construction."

Likewise, we would urge the commission to make explicit that the approval would not be for a demolition under 320-21-11-h in order to not set a dangerous precedent legitimizing demolition by neglect, defined in 320-21-3-d as "the failure of a building owner to maintain a historic structure or a structure or improvements on a historic site or within a historic district." 320-21-11-h-6 specifically disallows granting a COA for demolition when the deteriorated condition of the building is a result of demolition by neglect, as evidence suggests is the case here. This section of the ordinance stipulates: "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" for demolition. Therefore, we do not believe it is possible to grant a COA for demolition under the ordinance in this case.

Therefore, if the commission grants the requested COA, we urge that it be done as suggested above, as a rehabilitation, in order to ensure a very close reproduction and in order to not set a precedent allowing for demolition by neglect.

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