



HISTORIC BREWERS HILL
NEIGHBORHOOD ASSOCIATION

December 15, 2017

Sent via U.S. mail and email to hpc@milwaukee.gov

City of Milwaukee Historic Preservation Commission
City Hall
200 E. Wells St., Room B-4
Milwaukee, WI 53202

RE: New home construction in Historic Brewers Hill
File No. 170945

Dear Commissioners,

We write to inform the Commission of the position taken by the Historic Brewers Hill Association relative to the above file number. For the reasons set forth below, we ask the Commission to follow the written guidance in both the Historic Preservation Ordinance and the 2001 “Historic Designation Study Report on the Brewers Hill Historic District”¹ when approving the materials for the applicants.

I. BREWERS HILL NEIGHBORHOOD

Milwaukee’s Historic Brewers Hill neighborhood is a socially, racially, economically, and culturally diverse neighborhood just north of downtown Milwaukee. The Brewers Hill neighborhood is bounded by Holton to the east, Pleasant to the south, Dr. Martin Luther King Drive to the west, and North Avenue to the north. Our neighborhood is one of two primarily residential areas from the City of Milwaukee’s original settlement period in the mid-1800s. Today, Brewers Hill is an urban, residential neighborhood comprised of over 900 household units. Our residents are equally proud of our rich history and diversity. We also pride ourselves as being incredibly involved in our neighborhood and City affairs.

II. BREWERS HILL HISTORIC DISTRICT

In 1985, a portion of the neighborhood was officially bestowed with an historic designation, the “Brewers Hill Historic District”. The Brewers Hill Historic District generally is bounded by Hubbard to the east, Vine Street to the south, Dr. Martin Luther King, Jr. Drive to the west, and Lloyd Street to the North. It is within these boundaries that all property owners must comply with the City of Milwaukee Historic Preservation Ordinance (s. 320-21). The ordinance,

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which has been on the books for over 35 years, is enforced by you, the Commissioners of the Historic Preservation Commission (HPC). If a property owner is within the historic boundaries, then he or she must apply to the HPC for a Certificate of Appropriateness, whether the structure was built in 1875 or 1995 or is even non-existent at the time of application.

III. THE HISTORIC BREWERS HILL ASSOCIATION

The Historic Brewers Hill Association is a voluntary association, a 501(c)3 not-for-profit that was established over 30 years ago. The Historic Brewers Hill Association serves to advance the wellbeing and general interest of persons living within our geographic boundaries, meaning we serve to elevate all within our neighborhood boundaries. We are a member and volunteer-driven organization, comprised of anyone who is committed to our goals, which include promoting property rehabilitation, eliminating blight, improving the family environment, developing an increased sense of community concern, advancing racial harmony, providing an effective voice in governmental affairs, and encouraging local home ownership. To accomplish these lofty goals, HBHA's members devote an incredible amount of time to advancing our goals and cultivating a safe, prosperous, and beautiful neighborhood for all.

Members of the Historic Brewers Hill Association elect a board of directors to guide our organization. The Board of Directors volunteer their time and resources to serve our neighborhood. Our ten-member Board of Directors includes a President, Vice-President, Secretary, Treasurer, and five at-large directors.

IV. HBHA POSITION RE: FILE NO. 170945

File No. 170945 is an application for a new single-family home to be built on a vacant lot at the northwest corner of North 1st and West Brown Streets. This property is one of few vacant parcels within the Brewers Hill Historic District. Contrary to staff testimony at the November 6 HPC meeting, immediate neighbors have informed us that the prior structure was not demolished due to fire. Rather, the structure was condemned and razed by the City in 2010. Since the existing structure was razed, the lot has sat vacant.

This application for constructing a new single-family home is supported by the Historic Brewers Hill Association. Consistent with the HPC, we find the renderings appropriate for our neighborhood and historic district.

In addition, this application fills a need in our neighborhood: construction of single-homes that are owner-occupied. Per the HPC Staff Report, it has been ten years since a new single-family home was built within the historic district and 15 years since the second-most recent structure (condominiums) was built. The Historic Brewers Hill Association has advocated before other City Commissions that our optimum vision for our neighborhood's vacant parcels includes single-family homes, designed to complement the historic nature of our neighborhood. We firmly believe that additional owner-occupied homes strengthen our neighborhood and our city. The Historic Brewers Hill Association supports this application.

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V. RESPONSE TO NOVEMBER 6, 2017 HPC STAFF REPORT PTS #114399

On November 6, the HPC staff distributed a Staff Report at the HPC's November 6 meeting. This report states support for the applicant's design, but lists four areas of concern regarding the applicant's proposed materials: windows, siding, porch, and trim.

For the reasons stated below, we respectfully ask the Commission to deem appropriate some or all of the applicant's proposed materials.

A. Written Policy Over Practice

At the November 6 HPC meeting, it was clear that the applicants relied on official documents from the City of Milwaukee to inform them of material standards: the Historic Preservation Ordinance and the Historic Designation Study Report Brewers Hill Historic District. That they relied upon these documents when selecting materials, settling on an offer with the City of Milwaukee that owns the property, and making overall design decisions, seems abundantly reasonable. These two documents are available on the HPC's website. They are also available on our website, www.historicbrewershill.com.

i. HPC Ordinance

Of course, with any issue relating to a City matter, one starts with the City of Milwaukee ordinances. As such, the HPC lists the Historic Preservation Ordinance prominently on its website. The Ordinance itself does not list appropriate materials to be used in the construction or alteration of properties within a historic district. Neither s. 320-21-11-g nor s. 320-21-12 expounds upon or suggests materials to be used. The ordinance is silent on materials to be used for siding, windows, trim, or porch.

ii. Historic Designation Study Report

The HPC website itself directs parties to visit the study report listed for each Historic District or Property. "The study report contains information on the historic significance of the property or district, and guidelines to follow when doing exterior alterations, additions, and new construction."ⁱⁱ The study listed for the Brewers Hill Historic District is the 2001 memorandum entitled "Historic Designation Study Report Brewers Hill Historic District" (hereinafter referred as the Brewers Hill Study Report).

This Brewers Hill Study Report clearly and plainly provides property owners, applicants, and others official information about the materials to be used on properties within the Brewers Hill Historic District. Relevant to the issue at hand, the memo distinguishes between alterations to existing structures and new constructionⁱⁱⁱ.

For alterations to existing properties, the Brewers Hill Study Report delineates materials for roofing, exterior finishes (it lists masonry, wood, and stucco and then expounds upon each of those finishes), windows, porches, trim, ornamentation, and streetscapes. For example, materials to be used for exterior finishes in wood on existing structures states the following in such specificity:

- i. Retain original material, whenever possible. Avoid removing architectural features such as clapboards, shingles, cornices, brackets, half-timbering, window architraves and doorway pediments. These are in most cases an essential part of a building's character and appearance that should be retained.
- ii. Repair or replace deteriorated material with new material that duplicates the appearance of the old as closely as possible. Avoid covering architectural features with new materials that are inappropriate or were unavailable when the building was constructed such as artificial stone, brick veneer, asbestos or asphalt shingles, vinyl or aluminum siding.^{iv}

In contrast, the Brewers Hill Study Report states the following for all materials to be used in the new construction's complete exterior of the structure:

The building materials that are visible from the public right-of-way should be consistent with the colors, textures, proportions, and combinations of cladding materials traditionally used in Brewers Hill. The physical composition of the materials may be different from that of the historic materials, but the same appearance should be maintained.^v

iii. Application of Policy

Because the written policy is so clear, the policy is what the applicants should be judged by. As noted above, the HPC shares the study reports to inform applicants of the guidelines to follow when doing exterior alterations, additions, and new construction. Therefore, applicants within the Brewers Hill Historic District absolutely should be expected to rely on the information within the Brewers Hill Study Report and the HPC absolutely should judge applications' materials by the policy standards clearly and plainly articulated in the Brewers Hill Study Report.

The guideline, relating to materials to be used in new construction, plainly refers to the building materials visible to the right of way. In this application, the right of way is the south- and east-facing facades of the home. Second, for these materials, the standard is only that they are consistent with the "colors, textures, proportions" of materials traditionally used and that the "physical composition may be different." As written, the guidelines are silent on the specific type of materials to be used in new construction. Based on the lack of a material standard, consideration should be given to defining material type for new construction, particularly in areas that are visible to the right of way.

VI. CONCLUSION

If the HPC intends to apply a different standard to new construction than the one plainly articulated in the Brewers Hill Study Report, then it should develop this standard and amend the Study Report accordingly. This amendment will allow applicants of new, single-family houses to have a clear and concise knowledge base from which to develop building plans, and for staff to not rely on a case-by-case basis and/or past precedent by utilizing handouts not readily available to the public or other City departments. In addition, HPC should share any written standards for materials with the Historic Brewers Hill Association. We post and/or link to all HPC materials on our website, www.historicbrewershill.com, which receives regular traffic and is a known repository for all Historic Preservation standards.

In sum, we respectfully ask that the HPC apply its own written standards for new construction materials when evaluating File No. 170945.

Sincere Regards,

Historic Brewers Hill Board of Directors

cc: Alderwoman Coggs (via email)
Tim Askins, Senior Planner (via email)
Carlen Hatala, Senior Planner (via email)

ⁱ The Study Report and occasionally other materials spell Brewers Hill with an errant apostrophe between the r and s of Brewers. However, there is no such apostrophe. Generally, American geographic places or monuments do not bear an apostrophe (i.e., Pikes Peak, Harpers Ferry, etc.). The Historic Brewers Hill Association long ago decided to adopt the American standard. This memorandum is consistent with the American tradition and will always change references from Brewer's to Brewers.

ⁱⁱ City Clerk's Office, "Historic Properties & Districts," available at <http://city.milwaukee.gov/cityclerk/hpc/HistoricPropertiesDistricts#.WiYAKGeWzmQ>, accessed 15 December 2017.

ⁱⁱⁱ *Compare*, Brewers Hill Study Report, pages 6, 7, and 8 (setting historic preservation guidelines when altering existing existing structures), *with* Brewers Hill Study Report, page 9 (setting historic preservation guidelines when building a new structure). Brewers Hill Study Report available at <http://www.city.milwaukee.gov/ImageLibrary/Groups/cityHPC/DesignatedReports/vtincf/HDBrewersHill.pdf>, accessed 15 December 2017.

^{iv} See Brewers Hill Study Report at 7.

^v See Brewers Hill Study Report at 9.

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