



United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240



March 24, 2021

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Re: **Coronado Apartments, 275 Merton Road, Detroit MI**  
Project Number: **25701**

Dear [REDACTED]

I have concluded my review of your appeal of the January 28, 2020 Decision of Technical Preservation Services (TPS), denying the Part 3 – Request for Certification of Completed Work application regarding the rehabilitation of the property cited above (the Decision). The appeal was initiated and conducted in accordance with Department of the Interior regulations [36 C.F.R. part 67] governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you and [REDACTED] for meeting with me via videoconference on August 11, 2020, and for providing a detailed account of the project.

After careful review of the complete record for this project, including the information presented during and subsequent to the appeal meeting, I have determined that the completed rehabilitation does not comply with the Secretary of the Interior's Standards for Rehabilitation (the Standards) and the proposed remedial treatments do not adequately resolve the denial issues. Accordingly, I affirm the TPS January 28, 2020 Decision to deny certification of the Part 3 application.

The ca. 1928 Coronado Apartments is a four-story building, a C-shaped garden court in plan, constructed in a Spanish/Moorish Revival Style. It features multi-colored yellow and orange brick walls, clay tile roof trim, and iron balconies. On the ground floor, an entrance lobby is at the center of the building and connects to double-loaded corridors on either side. A central double-loaded corridor connects the units on the upper floors. Significant historic interior features include wood paneling, arched doorways with spiral-carved columns, ceramic tile floors, and other ornamentation in the lobby area, as well as vaulted ceilings and textured plaster finishes with wood base moldings along the corridors. Within the individual units, many retained their historic features such as plaster walls and ceilings, wood window trim, base boards, ceiling moldings, and wall and panel moldings in the living

and dining rooms, and distinctive features such as arched openings above half-height cabinets between the dining rooms and kitchens, and uncased corbelled openings in the living rooms.

The written descriptions in the Part 2 – Description of Rehabilitation application stated that the wood windows would be removed and replaced with aluminum windows, but without a survey justifying their removal and replacement. The application stated that the interior plaster was deteriorated beyond repair and would be removed and replaced with dry wall and that there would be “*minor reconfigurations to the floor plans, primarily in the kitchens.*” However, the demolition drawings showed the removal of small portions of the existing walls as well as the removal of kitchen and bathroom fixtures, cabinets, and appliances. And, the demolition specifications called for the removal of all existing wall finishes in the individual units. TPS consequently issued a conditional approval of the Part 2 application, stipulating two conditions:

1. *The proposed replacement window system does not appear to adequately reproduce the appearance of the full variety of historic windows found in the building. Please provide detailed profile and section drawings for each type of historic windows found in the building, including photos of all units that contain decorative and/or colored glass detailing. Comparative detail of each type of existing window and the proposed replacement product, including details of how the decorative glass patterning and coloring will be recreated, shall be submitted for review and approval before the historic units are removed or replacements are ordered.*
2. *The existing window and other decorative wood trim must be replaced with new trim that matches the dimensions and profiles of the existing trim. Photographic documentation showing the profiles of the existing and new decorative trim must be submitted with the Request for Certification of Completed Work.*

A subsequent amendment provided some additional information describing the proposed replacement windows as well as photographs and drawings showing existing and proposed sections of wood base trim and window casings. TPS determined that the amendment did not have enough information to evaluate and consequently did not review the amendment. In the amendment, you asserted that the walls between the living and dining rooms and kitchens “*must be removed*” in order to meet Department of Housing and Urban Development (HUD) minimum property requirements. You also stated that, “*it is impractical to replicate the wood molding creating ‘panels’ as well as the coved ceiling and picture molding due to the proposed unit configuration.*” Note that in this instance you chose to prioritize the HUD requirements over the Standards governing this program. The regulations state, “*The Secretary’s Standards for Rehabilitation take precedence over other regulations and codes in determining whether the rehabilitation project is consistent with the historic character of the property and, where applicable, the district in which it is located.*” [36 C.F.R. § 67.7(e)].

In its January 28, 2020 Decision regarding the Part 3 – Request for Certification of Completed Work application, TPS summarized the denial issues, stating, “*The removal of historic features and finishes on the apartment units, the overall alteration of the historic character of the apartment units, and the lack of details needed to evaluate the new replacement windows cause the overall rehabilitation to fail to meet the Secretary of the Interior standards for Rehabilitation.*” TPS determined that the completed rehabilitation does not meet Standards 2, 5, and 6 of the Secretary of the Interior's Standards for Rehabilitation. Standard 2 states, “*The historic character of a property shall be retained and preserved.*



*The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.” Standard 5 states, “Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.” Standard 6 states, “Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.”*

In my review, I first examined the Part 2 – Description of Rehabilitation application, drawings and photographs to determine the conditions of the building’s interiors prior to the rehabilitation. The Part 2 demolition floor plans show that there are eleven units on floors 1-4 with five being mirror-image plans: 1 and 10, 2 and 9, 3 and 8, 4 and 7, and 5 and 6. Unit 11 is on floors 2-4, above the first-floor entrance lobby. There are Part 2 photographs for five of the six plan types; the only ones lacking photographs are unit plans 2 and 9, the courtyard-facing units on the front of each wing. Consequently, since the plans stack from floor to floor, there is photographic evidence of likely pre-rehabilitation conditions in 35 of the 43 units. Living and dining rooms had the most elaborate trim details, varying from unit to unit; bedrooms had only a crown molding at the ceiling; and entrance halls had no wall or ceiling trim above the baseboards. The pre-rehabilitation conditions in the living rooms and dining rooms documented in the Part 2 photographs are summarized below (photo numbers are in parentheses).

#### Apartment 106 (unit plans 5 and 6)

- The front hall (44) has no wall or ceiling trim above the baseboard. There was a telephone alcove in the side wall, probably no longer extant.
- The living room (45, 46) has a small crown molding below a large cove molding and tall wall panels defined by two unequal-sized crown moldings. The window surrounds interrupt the panel moldings. Above each door head is a panel that matches the height of the adjacent wall panels, outlined by the larger of the two moldings around the wall panels.
- The dining room (48) has similar trim but has a chair rail that divides the wall panels into an upper and a lower panel.
- The kitchen (47) was separated from the dining room by a full-width elliptical-arched opening springing from a pair of low bookcases/dish shelves. I believe this was removed; there is no evidence of it in the Part 3 photographs. The same opening would have been in mirror-unit 5; the demolition plans show a same-sized kitchen opening to be removed in units 4, 7, and 11.

#### Apartment 208 (unit plans 3 and 8)

- The entrance vestibule (57, 59) has no wall or ceiling trim above the baseboard. There are two uncased rectangular openings with curved corbels, one leading into living room and the other to the back hall.
- The living room (58, 59) has a small crown molding below a large cove molding and tall wall panels defined by two unequal-sized crown moldings. The window surrounds interrupt the panel moldings. There are two rectangular openings with curved corbels in the living room, one leading to the front hall and the other into the dining room. Above each corbelled opening is a rectangular panel that matches the height of the adjacent wall panels, outlined by the larger of the two moldings around the wall panels.
- The dining room (60) and both bedrooms (61, 62 and 64, 65) have small crown moldings at the ceiling but no wall trim above the baseboard.

#### Apartment 210 (unit plans 1 and 10)

- The entrance vestibule (67) has no wall or ceiling trim above the baseboard. There appears to have been a telephone alcove in the side wall, probably no longer extant. There are two uncased rectangular openings with curved corbels, one leading into living room and the other to the bedroom and bathroom.
- The living room (67, 68) has a large decorative cornice above a small crown molding but no wall paneling. The paired living room windows are set in a splayed reveal.
- The dining room and kitchen (67, 69) have a chair rail but no wall paneling. Photos do not show if there had been any trim at the ceiling.

#### Apartment 211 (unit plan 11)

- The living room (75, 77) has a large decorative cornice above a small crown molding but no wall paneling. There is an uncased rectangular opening with curved corbels (77) leading to the entrance vestibule.
- The dining room (76) has a chair rail with wall panels below it defined by a single crown molding and a small crown molding at the ceiling.

#### Apartment 303 (unit plans 3 and 8)

- The living room (85, 85A, 86) has a small crown molding below a large decorative cornice and tall wall panels defined by two unequal-sized crown moldings. The window surrounds interrupt the panel moldings. There is a wide uncased rectangular opening (85) with curved corbels leading into the dining room.
- The dining room (87) has a chair rail and a small crown molding at the ceiling.

#### Apartment 304 (unit plans 4 and 7)

- The living room (91, 92, 93) has a small crown molding below a large decorative cornice and tall wall panels defined by two unequal-sized crown moldings. The window surrounds interrupt the panel moldings. There are two uncased rectangular openings (92) with curved corbels one leading into the front vestibule (with a telephone alcove visible) and the other leading to the bedrooms. Above each corbelled opening is a rectangular panel that matches the height of the adjacent wall panels, outlined by the larger of the two moldings around the wall panels.

#### Apartment 401 (unit plans 1 and 10)

- The entrance vestibule (101) has no wall or ceiling trim above the baseboard. There are two uncased rectangular openings with curved corbels, one leading into living room and the other to the bedroom and bathroom.
- The living room (102) has a small crown molding below a large decorative cornice but no wall trim above the baseboard.
- The dining room (104) interior walls have a chair rail with wall panels above and below it, each defined by a single crown molding. The exterior walls have no wall trim above the baseboard. There is a small crown molding at the ceiling. There is a panel above the door head that matches the height of the adjacent wall panel, outlined by the same molding as around the wall panels.
- The kitchen (104 and foreground of 103) is separated from the dining room by short wing walls and a pair of low bookcases/ dish shelves. The same opening would have been in mirror-unit 10; the demolition plans show a same-sized kitchen opening to be removed in units 2, 3, 8, and 9.

Although the Part 2 photographs show the typical deterioration caused by leaving buildings without heat, and some evidence of copper salvaging, they also confirm that there were remaining historic features and trim in sufficient quantity to allow for their repair, or replication and replacement where necessary.

Your appeal presentation by [REDACTED] included information on the exterior, lobby, and circulation corridors (which were not denial issues) and focused on new trim details inside the individual units. It did not address TPS's Part 2 condition regarding the lack of adequate information about the replacement windows or the removal of partitions in the living and dining rooms and kitchens described in the amendment. We discussed at the appeal meeting the possibility of restoring the interior trim to match the original configurations and replacing the non-matching balcony doors with doors that match the original doors that had been removed. You agreed to have [REDACTED] prepare a remediation proposal, and I agreed to review the proposal before issuing an appeal decision.

[REDACTED] proposed to reinstall interior trim in units 1, 3, 4, 5, 6, 7, and 8 on the first and fourth floors and unit 11 on the fourth floor (15 of the 43 units), and to replace the balcony doors in four locations (although there are ten balcony doors, one each in units 102, 103, 108, 109, 202, 203, 208, 209, 211, and 311). The proposal was mute on the restoration of the partition walls removed in the rehabilitation on which much of the original trim was located. The effect of removing these partition walls upon the character-defining spatial configuration of these units is itself an issue that merits denial for failure to comply with the Standards. In this case, removing these partition walls also has an impact on the effectiveness of remediating any lost interior trim located upon or contextually related to those now removed walls. When I asked [REDACTED] about the apparent limits of the proposed remediation, he responded that, "*It is not the intent of the owner to reconstruct walls already removed,*" but it is "*to install moldings to match what was removed insofar as the walls are available upon which to install the molding.*" He also stated that all ten balcony doors would be replaced. He further commented that the units suffered additional decay and demolition by vandalism between the time the Part 2 photographs were taken and the start of construction as justification for why not all units were proposed for remediation. However, I note that the building was under the owner's control and responsibility for that period.

The McConnel proposal would reinstall the trim in the now open-plan living/dining/kitchen spaces in four of the unit plan types (even though there are pre-rehabilitation photographs of five) on the first and fourth floors but does not describe how the trim would be reinstalled in the now open-plan spaces. To reinstall the trim, the walls between the living and dining rooms and the kitchens would have to be reconstructed because the trim types varied from room to room. Further, since the plan types stack from floor to floor, reinstalling trim on only two floors is not adequate; all four floors would require remediation.

After comparing the pre-rehabilitation Part 2 photographs with the Part 2 proposed floor plans and the Part 3 photographs of the completed work, I have determined that remediation of the interior trim is not practicable or even warranted. In every unit, the walls dividing the living rooms from the dining rooms and from the kitchens have been removed, destroying the character-defining spatial configuration of all six original unit plan types. All the corbelled openings have been squared off. The full-width elliptical-arched openings between the dining rooms and the kitchens in all units have been removed. One side of



the splayed window reveals was removed in units 1 and 10. Closets have been installed in the living rooms of unit types 2, 3, 8, and 9. And, HVAC soffits have been installed across one wall of every living room. The cumulative impact of these changes has severely compromised the historic character of every unit's interior contrary to the Standards and rendered impossible the recreating of the interior trim in a manner consistent with the Standards because three rooms with different trim types have been combined into a single large open space.

Finally, the TPS stipulation requiring justification of replacing the historic windows and details concerning how they are an appropriate match was never fully met. And, although some of the replacement windows appear to be a reasonable match to those removed, not all visible in the Part 3 photographs match the historic configurations.

Accordingly, I affirm the January 28, 2020 Decision by TPS denying the Part 3 – Request for Certification of Completed Work application.

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the January 28, 2020 Decision that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA, FAPT  
Chief Appeals Officer  
Cultural Resources

cc: MI SHPO  
IRS

[REDACTED]