



September 21, 2002

City of Hartford
Historic Preservation Commission
c/o Planning Division
260 Constitution Plaza
Hartford, CT 06103

RE: 251 Maxim Road
Proposed demolition of the former Hartford-Brainard Airport Administration Building

Dear Chair Jahnke and commissioners:

On behalf of the Hartford Preservation Alliance, I am respectfully requesting that the Hartford Preservation Commission deny the above referenced application for the demolition of the former Administration Building of the Hartford-Brainard Airport.

The applicable section of the Municipal Code is as follows:

**City of Hartford Municipal Code
Sec. 28-219 (e)**

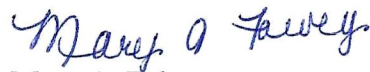
Demolition of a protected property shall be approved by the commission only if the applicant establishes, to the satisfaction of the commission, that (1) there is no economically feasible alternative to demolition or (2) the property, through no fault of any owner of the property after the effective date of this chapter, does not contribute to the architectural or historic character of the district.

The Municipal Code clearly states that the burden of proof for demolition is on the applicant to show either "no economically feasible alternative" or no contribution to the historic character of the district (i.e., the applicant must show both no architectural contribution AND no historical contribution). If the applicant claims no feasible alternative, it must prove what efforts they have made to find alternatives and why they were rejected. This should include proof that applications for financial assistance were made and rejected. Mere assumptions of no feasibility are insufficient under the ordinance. If the applicant claims no significance, mere architectural insignificance is not sufficient. It must also show the absence of historical significance.

The application before this commission contains no proof of the lack of an economically feasible alternative to demolition. As per the letter dated August 10, 2002, from the Connecticut State Historic Preservation Officer, and submitted by the applicant, "its demolition adversely impacts historic resources, namely the Subject Property." For these reasons, we request the denial of the application. A copy of the state inventory form for the Hartford-Brainard Airport is attached for your reference.

The City's Department of Licenses and Inspections maintains a list of individuals and organizations that are notified whenever a demolition request not requiring historic review is submitted to them. We respectfully request that the Historic Preservation Commission direct the Planning Division to likewise notify, in a timely manner, the members of the public on this list whenever an application is submitted to their department for a demolition requiring historic review.

Respectfully submitted,



Mary A. Falvey
Executive Director

encl.

STATE-OWNED BUILDINGS LISTED ON THE STATE REGISTER OF HISTORIC PLACES

Agency Number: 5000
 Department of Transportation (continued)

<u>Street Address</u>	<u>Building Name</u>
GREENWICH Strickland Road Route 15 Northside Route 15 Southside	Passenger Station Gas Station North Gas Station South
GROTON Groton	New London Hangar 2 PE
HADDAM Route 82 Route 82	Garage Maintenance Garage
HARTFORD Brainard Airport Brainard Airport	Headquarters Building Hangar
LITCHFIELD Russell Street Route 202 Route 202 Route 202	Storage Building Garage Salt Shed Jet Hangers (5-Bay)
MILFORD 49 Clark Street	House #83-156-6

From: Rafie Podolsky <rpodo1898@aol.com>
Sent: Wednesday, September 21, 2022 12:32 PM
To: Hartford Planning Division
Subject: Historic Preservation Commission hearing -- Brainard Airport Administrative Building

Follow Up Flag: Follow up

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To: Historic Preservation Commission

From: Raphael Podolsky

I am writing you in support of the position of the Hartford Preservation Alliance in opposition to the demolition of the Brainard Airport Administrative Building. You may know that I was one of the authors of the to the Hartford Preservation Ordinance in 2005. The ordinance simply does not allow the demolition of this building based on the evidence presently available. The two key parts of that ordinance are Section 28-219(e) and Section 28-221. The preconditions for demolition contained in the ordinance are not met by this application.

The building is a protected property under the ordinance. Section 28-221 requires every department and agency of the city (which, of course, includes the Commission itself) to treat demolition of a protected property as "an alternative of last resort" to be utilized "only when other reasonable alternatives do not exist." This means that a protected property cannot be demolished without a full and complete examination of alternatives. The burden of proof under the Ordinance is on the applicant for demolition, which must identify what alternatives have been explored and why each one is unreasonable. In dealing with protected properties, alternatives must include not only

immediate alternative uses but also interim alternatives, such as boarding a building. This is especially important if a protected property is not in immediate danger of collapse, as could be the case, for example, after a fire or other catastrophic event.

In regard to Commission decisions, Section 28-221 is supplemented (but not supplanted) by Section 28-219(e), which reinforces the burden of proof on the applicant and requires proof of either no economically feasible alternative or no detracting from architectural or historic character. In light of the documented history of Brainard Airport, demolition at the very least would detract from its historic character. Proof of no economically feasible alternative requires, as does 28-221, of documented proof that all feasible alternatives have been actually explored and rejected. For example, a claim of infeasibility based on the cost of repair would require the applicant to provide the Commission with a list of all potential funding sources identified (including state and federal programs) and applied for, accompanied by a report as to the result of each application. This would be a necessary element of the applicant's burden of proof and would allow the Commission to make its own determination as to whether the applicant had pursued all such paths to retention. The Ordinance intends that proof justifying demolition should be difficult, not easy.

If these preconditions for demolition are not met, it seems to me that the Commission has no alternative but denial of the application, at least at this time.

Thank you very much for the opportunity to comment.

Raphael Podolsky

104 Beacon St.

Hartford, CT 06105

860-836-6355

From: Chambers, Aimee
Sent: Wednesday, September 21, 2022 3:15 PM
To: alyssa.peterson@att.net
Cc: Mary Falvey; Hartford Planning Division
Subject: Re: Hartford Historic Preservation Commission - Objection to Demolition of 251 Maxim Road
Attachments: Exhibits for Objection to 251 Maxim.pdf

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Received. Thank you.

—

Aimee Chambers, AICP
Director of Planning
City of Hartford

On Sep 21, 2022, at 2:35 PM, Alyssa Peterson <alyssa.peterson@att.net> wrote:

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My name is Alyssa Peterson, 297 Grandview Terrace, Hartford, and I will be appearing to object to the demolition application at 251 Maxim Road.

Almost 6 months ago, I filed a Freedom of Information request with the CT Airport Authority (CAA), seeking the bid documents for the proposed demolition project. They later claimed no bid was awarded, thus I was not allowed to see specifics. Now I see that the CAA has chosen instead to seek the permit themselves before re-proposing demolition.

I am sorry to be adversarial here, however, there are glaring errors in the application relative to your Commission's enabling ordinance, especially Section 28-219, para(e). This uses the directive of "shall" which is mandatory in Connecticut by settled case law, but ONLY if the applicant has met certain critical criteria. Because the current submission fails in achieving the requirements to obtain your approval, this application should be quickly denied. Examples of errors are as follows.

1. As an active supporter of Brainard Airport, I am aware of no public outreach or call for possible re-use, to determine an economically feasible alternative to demolition. This is a public structure owned by the State of CT and its residents, and controlled by the Legislature through its oversight of the airport authority or CAA.

2. Hartford Jet, the field-based operator, has a second story conference room of photos showing how the subject building complements the small cluster of hangar and office buildings on this historic 103-year old airfield, including the original Pratt & Whitney hangar next door. I have attached a few photos to this letter. Any demolition would absolutely detract from the character of such a cluster of yellow brick and metal buildings that do not exist anywhere else in the state because of other prior demolition or dereliction at airfields (especially Bridgeport).

3. I can represent that as one of several people making changes at Brainard, we are finally launching a non-profit idea from last year that was originally intended to include ALL supporters of Brainard Field. This will include a coalition of area residents, history buffs, non-profits, South End businesses, pilots, hangar owners, flying schools, CT Aero Tech and its students – all whom value what this airport has done and can do for Hartford and the region going forward.

In addition to sponsoring events at Brainard, a main focus will be saving the subject building for aviation education purposes. In conjunction with area tech and flight schools, we intend to host high school classes for future pilots and mechanics which is done now in New York and Florida, sponsor youth groups, feature history collection(s), and be the first home to electric aviation and repair in Connecticut.

Through the Hartford Preservation Alliance, we intend to submit our proposal to use the portion of funds already set aside by the CAA for requisite lead abatement and removal *prior* to demolition – as the funds to instead conduct lead abatement and removal for re-use of the structure. Rough cost estimates have been obtained and we are confident of the availability of other funds for building maintenance after said remediation and rehab.

Again, I really must insist that you quickly deny the application as submitted, as it completely fails the language of your enabling ordinance(s) relative to demolition.

From: Alyssa Peterson <alyssa.peterson@att.net>
Sent: Wednesday, November 16, 2022 2:00 PM
To: Berschet, Paige
Cc: Chambers, Aimee; Mary Falvey
Subject: Please give this letter and attachment to Historic District Commissioners re 251 Maxim Road
Attachments: Highlighted insurance doc and figures - Admin Building.pdf

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Historic District Commissioners:

I am in receipt of the insurance claim documentation on the 251 Maxim Road property from January 2019; the video created for the demolition bid; as well as rehab numbers created in October 2022 by the applicant's consultant. Please accept the following observations as part of your deliberation:

- 1) Insurance Claim: This document demonstrates that a building on the State Historic Properties Register since 1985 and transferred to the CT Airport Authority (CAA) from the CT Dept of Transportation, was then neglected and uncared for, thus invalidating insurance coverage.

- 2) Demolition Video: The video plus demolition application documents submitted to this commission do not reflect damage that was so terrible and described as a dangerous "hazmat" situation, thus preventing a tour of the inside of the building.

3) Rehab Costs: The "phone numbers" created by the consultant in October 2022 for repair estimates were outrageous. At the meeting held onsite, repair figures were requested *at the time of incident* (January 2019). Those figures would have driven the decision for recommendation to the CAA Board *not* to repair at that time, and would have later figured in presenting the decision to demolish to the CAA Board. It should be noted that the 2011 and 2014 planning documents for Brainard Airport do not call for demolition of this historic property. Those figures were NOT provided. Rather, others from October 2022 were substituted to possibly satisfy paragraph (c) of Sec. 28-219 **Review by Historic Preservation Commission**, i.e. the relationship of the cost of historic preservation recommendations to the cost of the proposed project as a whole -- are not attainable or fundable, therefore, demolition is the only option.

SOLUTION:

It is a shame that space at the subject building had not been offered to groups operating at the airport, so that the minimum 70% occupancy rate would have been satisfied for insurance reasons. Well, that can happen now. It is suggested that the agenda item be tabled or withdrawn, to give representatives of three (3) educational and/or service non-profits that are already operating at the airport as well as a new non-profit, to seek either CAA and/or legislative transfer of both the building and a certain portion of CAA funds for purposes of rehab and occupation. There is very much a feasible and prudent alternative to demolition here, that must be explored.

It is important for this commission to understand that pilot and/or aviation-related education was highly-favored during discussions this past year at the Legislature, relative to closure concerns at Brainard Airport. As recently as two weeks ago, House Speaker Matt Ritter confirmed there is NO broad legislative support or the tens of millions of taxpayer dollars that would be required to both buy the airport operator out and clean expected contamination. Brainard is thus expected to continue operating and the FAA is expected to begin construction on a new tower by year end 2023.

The opportunity to expand on regional educational and operational needs by rehabbing and re-using this historic building, is a rare one not to be missed. While I have already testified during hearing, please add this letter as a continuation of my public commentary against demolition of the Admin Building. The applicant clearly did not seek alternative uses prior to submission, was the cause for the negligence and damage, and does not qualify for demolition relative to City ordinance. There is a better and more sustainable solution within reach.

Respectfully,

Alyssa Peterson
297 Grandview Terrace
Hartford, CT 06114

