



STATE OF MICHIGAN

RICK SNYDER
GOVERNOR

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
LANSING

EARL J. POLESKI
EXECUTIVE DIRECTOR

August 27, 2018

Ms. Sara Roediger, AICP
Director of Planning & Economic Development
1000 Rochester Hills Drive
Rochester Hills, MI 48309



Dear Ms. Roediger:

Enclosed is the Certified Local Government evaluation report prepared by Outreach Coordinator Laura Ashlee based on your written responses to our questions.

We thank you for your thorough responses and the inclusion of the city's expansive list of goals and objectives. We are pleased to know that Rochester Hills is including historic preservation planning in the master land use plan that will be completed this year.

We identified two issues needing attention, one of which addresses the need for ongoing survey. As stated in the report, current information about the city's historic resources is critical to successful historic preservation planning and credible and consistent decision-making. We would be happy to discuss the report if you have questions.

Please advise this office within ninety days after the date of this letter as to how these deficiencies have been or will be corrected. Also, please provide copies of this letter and the report to the members of the Rochester Hills Historic District Commission.

Feel free to contact Laura Ashlee at 517-335-2725 or ashleel@michigan.gov if you have any questions.

Sincerely,

Brian D. Conway
State Historic Preservation Officer

BDC:lra

cc: Bryan Barnett, Mayor of Rochester Hills

Enclosure (Evaluation Report)

**CERTIFIED LOCAL GOVERNMENT EVALUATION REPORT
EVALUATION PERIOD 2015-2018
City of Rochester Hills
August 24, 2018**

State Historic Preservation Office outreach coordinator Laura Ashlee sent Sara Roediger, the Rochester Hills director of planning and economic development, the 2018 evaluation form on June 13, 2018. The completed application was received in SHPO on July 2, 2018. Ms. Ashlee asked for additional information via email on July 6, 2018, and the information was received on July 31, 2018.

Basic Requirement #1: A local government shall “enforce appropriate state or local legislation for the designation and protection of historic properties.”

A) *Did the local government keep its ordinance in effect during the entire period 2015-2018?*
YES.

B) *Did the local government amend or revise the Historic District Commission bylaws during the evaluation period?*
NO.

Did the local government amend or revise the local historic preservation ordinance during the evaluation period?
NO.

C) *Are the new ordinances, amendments, bylaws, etc. consistent with the requirements of the CLG program?*
N/A
There were no new ordinances, amendments, or bylaws passed during the evaluation period.

Basic Requirement #2: A local government shall “establish by state or local law an adequate and qualified historic preservation review commission composed of professional and lay members.”

A) *Did the local government maintain a fully staffed commission during the entire time period?*
YES.

B) *Were all vacancies on the commission filled within sixty days?*
YES.

The city anticipated vacancies due to term endings and appointed new commissioners prior to the positions being vacated. When one position was vacated due to the death of a commissioner, the appointment was made immediately to fill the position.

C) *Was an effort made to find qualified professionals to fill vacancies?*

YES.

The commission has a contract with Kidorf Preservation Consulting to serve as HDC staff and to advise the commission. The CLG does not appear to be advertising specifically for people meeting the professional qualifications. Individuals meeting the qualifications are preferred, but not required.

Recommendation:

- SHPO recommends that the local government include a statement in the vacancy notice that persons meeting professional qualification standards for archaeologist, architect, architectural historian, historian, or historic architect are encouraged to apply.

D) *Did the commission maintain records and operate in accordance with its written guidelines, including conflict of interest rules?*

YES.

The commission maintains excellent meeting records, and the conflict of interest policy for the city is consistent with the requirements of the National Park Service.

E) *Did the commission respond to 100 percent of the applications for Certificates of Appropriateness within the time frame specified in the ordinance?*

YES.

The city's ordinance requires that a Certificate of Appropriateness be issued within 60 days. The average response time for each year of the evaluation period was 30 days.

F) *Were fewer than 20 percent of the commission's design review decisions appealed and then overturned?*

YES.

Of 15 decisions made during the evaluation period, one application was denied, and it was not appealed.

G) *Was the required training information from the SHPO distributed to all commissioners?*

YES.

Each new commissioner received a copy of the required training information. In addition, the city provided training for new HDC members as well as annual training for all members. Training was provided by Kristine Kidorf of Kidorf Preservation Consulting, an architectural historian meeting 36CF61 qualifications, who has a contract with the City of Rochester Hills to advise and staff the historic district commission and the historic district study committee.

Basic Requirement #3: A local government shall "maintain a system for the survey and inventory of historic resources."

A) *Did the local government maintain its system for the survey and inventory of historic resources during the entire time period?*

NO.

According to the evaluation response, "Surveys of individual properties are typically undertaken at property owner's request." There were no requests from property owners during the evaluation period. In addition, the CLG has not undertaken survey since an intensive level survey was completed in 2002. The city cites budget constraints as the reason why no city-initiated surveys were undertaken during the evaluation period. [See corrective action under Basic Requirement #5.]

- B) *If the survey work within the CLG's jurisdiction is not yet complete, have architectural and/or archaeological surveys been initiated?*
NO.
- C) *If archaeological surveys have been initiated, was the State Archaeologist contacted prior to the commencement of work?*
N/A
- D) *Does all survey work meet with the Secretary of the Interior's Standards for Identification?*
N/A

Basic Requirement #4: A local government shall "Provide for adequate public participation in the Historic Preservation program, including the process of recommending properties to the National Register of Historic Places."

- A) *Have all commission meetings been publicly announced and held in accordance with the Open Meetings Law, P.A. 267 of 1976?*
YES.
The meetings are typically held on a regular schedule of the second Thursday of each month. (Meetings are cancelled if no applications are submitted for review.) The agendas and packet materials are posted on the city's website.
- B) *Do the minutes of commission meetings include all decisions and actions of the commission, including the reasons for those decisions?*
YES.
The Historic District Commission keeps excellent minutes. The minutes provide a detailed account of the discussion with attributions of statements to the appropriate commissioner. The motions contain the appropriate decision language from P.A. 169: Certificate of Appropriateness, Notice to Proceed, Denial. In two of the three examples of minutes provided, the appropriate Secretary of the Interior's Standards for Rehabilitation were cited.
- C) *Have all procedures, guidelines, criteria, standards, etc. been available to the public for review and comment in accordance with the Freedom of Information Act, P.A. 442 of 1976?*
YES.
The materials are posted on the city's website.

D) *Has the CLG maintained an accurate record of all national register nominations from within the jurisdiction?*

NO.

The city's historic preservation consultant maintains a list.

Corrective recommendation: Maintain a record of all National Register-listed properties in the City of Rochester Hills

- Create and maintain a list of Rochester Hills properties in the National Register of Historic Places, retain copies of the nominations and make them available upon request from citizens. Downloadable copies of nominations for properties listed through 2013 are available through the National Park Service at <https://catalog.archives.gov/id/20812803>. Upon request SHPO will provide scans of the remaining nominations.

E) *Were complete reports submitted to the SHPO within the sixty-day period for 90 percent of all national register nominations from within the CLG's jurisdiction?*

N/A

No National Register nominations were submitted for properties in the city of Rochester Hills.

F) *Did 100 percent of the reports on National Register nominations objectively evaluate the properties in relation to the National Register criteria?*

N/A

Basic Requirement #5: A local government that has been certified shall "Satisfactorily perform the responsibilities delegated to it under the Act."

A) *Did the local government meet one or more of the goals that were identified at the time of certification or at the last evaluation?*

YES.

Rochester Hills established five broad goals with thirty objectives and related action steps at the time of its CLG application in 2009. Based on information provided with the evaluation response, the goals and objectives—and even action steps--appear to be ongoing. Many are relationship-based as the HDC works with other parts of local government to raise awareness of historic districts.

Perhaps the most significant achievement is the incorporation of historic preservation planning efforts in the city's master plan, which will be completed in fall 2018.

B) *Has the local government identified goals for the upcoming three-year period?*

YES.

The city will continue to use its expansive list to guide activities. The establishment of a local plaque program for properties in the district was noted in the evaluation response as the highest priority.

Having historic preservation planning as part of the master land use plan will go far to preserving historic resources. Up-to-date survey data is necessary for sound preservation planning and decision-making.

Corrective Action: Develop a plan for ongoing survey

Although Rochester Hills has conducted survey in the past, it needs to have a plan in place for keeping that information current. The goals table submitted with the evaluation response indicates that the last surveys were completed in 2002.

- The city should consider whether there are areas that may not have been surveyed or may not have met the criteria for listing in the past but have reached fifty years of age since the survey was completed (e.g. a mid-twentieth-century neighborhood that reflects modern design).
- Within existing districts, some buildings may have been noncontributing due to age in 2002, but may be contributing sixteen years later. Existing districts may need to be resurveyed.
- Establish the priority for each area to be surveyed and determine time frames.
- How will survey be accomplished? Volunteers? A consultant? The city may want to apply for a CLG grant to accomplish this goal.

Reminder regarding Annual Reports

Per the certification agreement, the city is required to submit an annual report to SHPO. Annual reports are due March 1 of each calendar year.

Evaluation completed by Outreach Coordinator Laura Ashlee on August 24, 2018.



Laura Rose Ashlee, Outreach Coordinator