

**State Historic Preservation Office
Michigan State Housing Development Authority**

**Staff Comments, October 31, 2012
National Twist Drill Local Historic District, Rochester Hills**

The photographs included in the report are between four to ten years old. Photos that show the district's current condition should be included.

Page 10, paragraph one states "The landscaped grounds were an attraction for sightseers." However there is no discussion of the landscape in the context or in the description. Are there any extant historic landscape features?

On page 11, the introductory paragraph to the "Significance of the District" section is somewhat misleading. The rules SHPO adopted in 2002 state that communities "must apply" the National Register of Historic Places Criteria when establishing districts. This makes the 1992 guide published by the MHPN, which states that communities "must be guided by" the criteria, obsolete. This paragraph should clearly state that communities must follow the National Register criteria.

The Criterion B significance statement is the place to make the case as to why the McGregor's were important to the community. Their activities, some of which are noted earlier in the report, should be specifically indicated here rather than the generalized statement "among other activities."

Under Criterion C, we consider the building's style to be early International rather than Art Deco.