



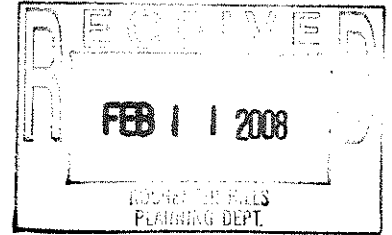
JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

January 29, 2008

Mr. Derek Delacourt  
City of Rochester Hills  
1000 Rochester Hills  
Rochester Hills, MI 48309



Dear Mr. Delacourt:

Staff members of the State Historic Preservation Office (SHPO) have reviewed the preliminary historic district study committee reports for the Stiles School Historic District and the Frank Farm Historic District. A copy of our comments is enclosed. We offer these comments in order to assist communities to prepare final study committee reports that meet the requirements of Michigan's *Local Historic Districts Act* and that provide a strong legal basis for protecting historically significant resources.

The report was presented to the Michigan Historical Commission and the State Historic Preservation Review Board. The State Historic Preservation Review Board did not concur with the SHPO that the Stiles School was ineligible for individual listing on the National Register of Historic Places. They stated that the majority of building's historic material was still in place and that while the windows had been altered, the openings themselves were still in tact. They also felt the massing of the original school building had not been lost when the inappropriate additions were constructed. The historic building can still be discerned and is distinct from the additions. They believed the school building itself would be eligible as long as the report indicates that the additions are non-contributing resources.

We look forward to working with the city of Rochester Hills in the protection of its historic resources. If we can assist you further, please contact Amy Arnold at 517-355-2729 or [ArnoldA@michigan.gov](mailto:ArnoldA@michigan.gov).

Sincerely,

Brian D. Conway  
State Historic Preservation Officer

BDC:ALA

Enclosure

**State Historic Preservation Office  
Michigan Historical Center**

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**Staff Comments, December 19, 2007  
Stiles School Historic District, Rochester Hills**

Unfortunately, after reviewing this resource using the Secretary of the Interior's Criteria for eligibility to the National Register of Historic Places, it is our opinion that it would not individually qualify for inclusion in the National Register due to the loss of its original windows, a significant design feature for this building. According to *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* "the property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style" (p. 46). The resource has also lost its historic setting and feeling due to insensitive additions. According to National Register Bulletin 15, "A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment." (p.46)