## Staff Comments, August 24, 2007 1470 W. Tienken Road, Rochester Hills

We do not concur that the changes made to this house are significant enough to have destroyed the historic integrity of the resource. Screening in a side porch cannot be considered a significant change. Many resources that have been covered in aluminum siding have been approved for listing on the National Register; siding of itself does not destroy historic character. In our opinion, that is the case for this house, where detailing was always minimal. The addition of a second story on the pre-1916 ell in 1987 or the addition of a one-story wing in 1995, both of which should have been approved by the historic district commission, would not, in our opinion, be considered significant enough to change the determination for this resource from historic to non-historic. Regarding the demolition of the farm buildings, the house was determined to be significant for its "farmhouse architecture" not as a farmstead. The report does not state when the farm buildings were demolished—before or after Mr. McCullough purchased the property? Before or after the resource was designated as a local historic district?

It is alarming that that the study committee is using changes that occurred to historic resources AFTER they were designated as local historic districts, and therefore it is presumed the work received the approval of the historic district commission, as the basis for eliminating historic districts in Rochester Hills. As a Certified Local Government, the city of Rochester Hills has signed an agreement to uphold the Secretary of the Interior's Criteria and Standards and Guidelines for historic properties. If the historic district commission is approving work that does not meet the Secretary of the Interior's Standards, the city is not meeting its responsibility under the agreement. If work is being done without a permit, then the city needs to address how it is enforcing its historic district ordinance. As a CLG, the city of Rochester Hills is expected to provide its designated historic resources with the fullest protection allowable under the law.