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November 15, 2012

The Historic District Study Committee
City of Rochester Hills
1000 Rochester Hills Drive
Rochester Hills, MI 48309

**Re: 6841 North Rochester Road, Rochester, MI
Parcel Identification No. 70-15-02-300-015
Your File No. HDSC 08-002**

Dear Committee Members:

Our office represents Corporate Park of Rochester Hills, Inc., which owns the above-referenced property that is up for consideration at your public hearing on November 15, 2012. As I am sure you are aware, our client and the adjoining property owner to the south strongly object to the City's attempt to designate their properties as a historic district. Their objections are supported by the unanimous vote of the City's Planning Commission on September 18, 2012 objecting to the historic designation stating that such a designation would have a detrimental impact on the properties.

There is nothing in the Preliminary Historic District Study Committee Report dated September 6, 2012 or the Final Report date November 1, 2012, that justifies designating this property as historic or otherwise preserving the buildings located there. The Report states that the property should be designated as historic since National Twist Drill and Tool Company has "tremendous historical significance" to the City as it was "Rochester area's largest industrial enterprise and represents Avon Township's contribution to the World War II effort." It further states that the art deco styled "office buildings are one of Rochester area's architectural treasures." These statements lack substance and do not justify designating this property as historic.

State statute and local ordinance provide that the criteria by which a historic district is considered shall be as codified for inclusion in the national register of historic places in the Code of Federal Regulations (CFR) Title 36, Part 60, Section 60.4. It should be noted that the National Historic Preservation Act of 1966, which authorizes 36 CFR

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60, states that if the owners of the property under consideration for historic district object to the designation, the property shall not become historic district:

If the owner or owners of any privately owned property, or a majority of the owners of such properties within the district in the case of an historic district, object to such inclusion or designation, such property shall not be included on the National Register or designated as a National Historic Landmark until such objection is withdrawn

16 USC 471, Section 101(a)(6)

Thus, with the Property owner's objection, this property cannot be designated as a historic district. Moreover, the Report does not meet the criteria for establishing a historic district.

National Register Criteria for Evaluation. 36 CFR 60.4

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

The Report does not provide any argument that the property has any qualities of significance in American history, architecture, archeology, engineering or culture.

(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or

The Report's sole argument in sub-paragraph (a) is that National Twist Drill was the area's largest employer for a period of 3 decades, which is now the same amount of time that it have absent from the premises. The mundane reality for National Twist Drill is that it:

- was founded in Detroit, not Rochester;
- manufactured metal cutting tools, which are essentially transacted at a commodity level, meaning there is nothing unique to any particular tool and for all intents are purchased at the lowest price;
- at one time was a vendor to the US Navy during World War II, along with tens of thousands of other vendors; and

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- is no longer in business as a stand-alone company, as Regal Cutting Tools now owns the brand name and merely markets some tools as being "National".

These facts do not establish historical significance or justify preserving the buildings.

(b) that are associated with the lives of persons significant in our past; or

While Howard McGregor, Jr. was a successful businessman and ostensibly very generous, he is merely one of thousands successful American manufacturers of the mid-twentieth century. Nobody is going to mistake Mr. McGregor for Henry Ford, Thomas Edison and others of that ilk, whose achievements and contributions are well known.

It should also be noted that once Mr. McGregor sold his company in 1968 that he sold off his lands for future development and that he and his family soon vacated the area. There is no evidence that Mr. McGregor or his family took action to serve the community or create a family legacy to the area.

If the committee wishes to acknowledge Mr. McGregor's contributions, this goal would be best served by placing placards on the land for the elementary schools and Crittendon Hospital.

(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

The Report states the office buildings on site are distinguished examples of Art Deco style. However, the State Historic Preservation Office calls these structures "early International". This disagreement over the architectural style undermines the Report's conclusions regarding the building's significance.

There is no evidence of innovation or novelty in design or construction in the buildings. The mere fact that a building was designed by a local architect who focused on designed homes does not make the buildings significant. The mere fact that the buildings were constructed by a well-regarded contractor, known for innovation in factory construction, does not make the buildings significant.

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(d) that have yielded, or may be likely to yield, information important in prehistory or history.

The Report does not provide any argument for this sub-paragraph (d).

In many instances the Report makes factual statements without providing for depth or context. For example, the Report states that "The landscaped grounds were an attraction for sightseers." That statement in a vacuum could make one think that this was like Meijer Gardens in Grand Rapids. This is one of many statements made in the report without any context, such as why were the grounds an attraction, how many people came and from how far away did people come?

Currently, these building are used for the lowest form of use for industrial zoned property, warehouse. As a result, this property is currently generating the lowest form of revenue possible, when there is great opportunity based upon demographics in the area to provide a modern and aesthetic use that would better serve the community. Hypothetically, if you were to zone this land right now, one of the last uses one would consider is industrial. Therefore, it lacks logic to preserve it as such. Designating this property as historic will only chill future re-development of this property and more than likely keep it in its status quo indefinitely, rendering the Flex Business Overlay District moot, which is not something the owners, the City, or the community desires.

In light of the foregoing, we respectfully request that the Study Committee make a recommendation to City Council to not designate our client's property as a historic district and that the property be removed from the City's "potential" list of properties to be designated historic.

Thank you for your consideration.

Very truly yours,

Carson Fischer, PLC


Gregory T. Obloy

GTO/hrk