STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

GRETCHEN WHITMER
GOVERNOR

Quentin L. Messer, Jr.
PRESIDENT

September 29, 2023

Ms. Jennifer MacDonald
Planning Specialist
City of Rochester Hills
1000 Rochester Hills Drive
Rochester Hills, Michigan 48309

Dear Ms. MacDonald:

State Historic Preservation Office (SHPO) staff members have reviewed the preliminary historic district study committee report for the Winkler Pond local historic district boundary change. Comments on the report are 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 provide a strong legal basis for protecting historically significant resources. These comments and recommendations are based on our experiences working with local historic districts. The SHPO lacks authority to give legal advice to any person or agency, public or private.

The report was presented to the State Historic Preservation Review Board at their September meeting, and they had no additional comments. We have received no comments from the Michigan Historical Commission.

We appreciate the city of Rochester Hills' efforts to protect its historic resources. If we can assist you further, please contact me at ArnoldA@michigan.gov.

Sincerely,

Amy L. Arnold
Preservation Planner

The report needs to be clearer on the resource counts. How many total properties were originally in the district? How many actual resources are being eliminated? What will the total count of historic and non-historic resources be once these resources are eliminated.

Why is the non-contributing resource at 1725 Washington Road still being included in the district? The report indicates that the reason is for "boundary continuity," but the boundary should be based on the significance and integrity of the resources. Per the National Register bulletin *Defining Boundaries for National Register Properties* (p.12), discontiguous elements can be included in a district, "When a portion of a district has been separated by intervening development or highway construction and when the separated portion has sufficient significance and integrity to meet the National Register Criteria." Is there a reason the boundary can't follow along the mill pond to the southwest property line of 1725 then down the property line to the middle of Washington Road and east to the eastern property line of 1740 Washington and then down? That way the non-contributing resource at 1725 Washington is excluded and the contributing resource at 1740 Washington is included. The boundary justification would address the issue. It seems odd to include one non-contributing resource in a line of 11 non-contributing resources just to make the boundary line neater.

Typically, the focus of a boundary modification study report is on the resources that are being eliminated, not those being retained. The information on the historic resources was already included the original study report. The modification report can be viewed as an addendum to the original report. Kept together they then provide the complete picture of the evolution of the district. Thus, this report should focus on the non-contributing resources being eliminated. While the report does include a general statement about the non-contributing resources, it should also include some documentation. In this case, that might be a short discussion of what the land was like when the district was created to explain why it was included in the district first place. A second short discussion about how and when things changed that enabled the construction of the modern homes would also be in order. The inclusion of construction dates and photographs for each house being eliminated from the district would be in order. The photographs included in the report are not useful. We recommend that photographs be taken in fall when foliage is less dense.