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June 19, 2020

Pat Sullivan, City Manager
City of Northville
215 West Main Street
Northville, Michigan 48167

Re: Local Historic District Study Report (Historic District Survey)

Dear Mr. Sullivan:

On June 6, 2019, the Local Historic District Study Committee (LHDSC) held its final public hearing regarding the Northville Local Historic District Study Report (or Historic District Survey), and has recommended the final draft to City Council for adoption, as revised.

The purpose of this letter is to describe the Study Report review process. This letter also describes two changes to the Report made by the Study Committee:

- 1. Changes to the Historic District Boundary:** This letter describes the reasons behind modifications (or no modifications) to the Historic District boundary. Noted in particular is a difference between the consultant's recommendation and the LHDSC's final decision on the location of the boundary on the south side of E. Cady St. As City Council will be making the final decision on the Study Report and the boundary, we thought it important that Councilmembers understood the rationale behind the decisions made.
- 2. Adding an explanatory statement to the introduction of the Study Report:** In the Local Historic District Study Committee's motion, they added a disclaimer that this report is presented as a living document with the information available at press time. The meeting minutes further describe the intent of this statement. This statement has been added to the introduction of the Study Report.

Study Report Review Process

Northville retained the services of Commonwealth Heritage Group (consulting architectural historians) to survey the properties within the existing Historic District, and draft a Study Report that describes the survey results and makes recommendations for changes to the District boundary. The LHDSC was appointed by the City Council to review Study Report drafts, collect resident comments on the draft, and provide input to the consultant. The LHDSC held seven public meetings, three of which were Public Hearings. Residents were encouraged to provide input at all meetings, and comments were also collected via a dedicated e-mail address on the project webpage. The State Historic Preservation Office (SHPO) and State Historic Preservation Review Board have also reviewed and commented on the draft. The Committee members reviewed four drafts of the report before the final report was prepared. All drafts incorporate comments made by residents, the Committee, and SHPO.

The next step in the process is for City Council to review the draft document, consider it, and adopt it if you choose. The associated Historic Preservation Ordinance also needs to be approved at the same time. The Ordinance has been revised with the new District Boundary. Regarding timing of adoption, Council moved to extend the deadline for adopting the Study and approving the ordinance with the new boundary description by 90 days, or to September 6, 2020.

Historic District Boundary

The final draft of the Study Report includes a revised Historic District boundary, as shown on the accompanying map. The consultant recommended specific changes to the District boundary. The LHDSC considered each recommendation, but didn't agree with all. These recommendations/changes are shown on the map titled "Northville Historic District Map – Illustration of Recommended and Confirmed Changes" as follows:

- The blue lines represent the consultant's recommendation to remove non-contributing or vacant properties from the Historic District boundary.
- The red lines represent the areas where the LHDSC agreed with the consultant's recommendation to remove the properties from the District boundary.
- The green lines represent slight adjustments to the boundary to include the entire property in the Historic District.

Consultant's Boundary Recommendations:

The consultant's rationale to remove non-contributing/vacant properties from the Historic District boundary was to ensure that the district had more "contributing" properties than "non-contributing properties." We provide the following definitions as background:

A "contributing" building, site, structure, or object adds to the historic associations, architectural qualities, or archeological values for which a property is significant because:

- a. It was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity or is capable of yielding important information about the period; or
- b. It independently meets the National Register criteria.

A "noncontributing" building, site, structure, or object does not add to the historic associations, architectural qualities, or archeological values for which a property is significant because:

- a. It was not present during the period of significance or does not relate to the documented significance of the property;
- b. Due to alterations, disturbances, additions, or other changes, it no longer possesses historic integrity or is capable of yielding important information about the period; or
- c. It does not independently meet the National Register criteria.

(Note: The "period of significance" identified in the Study Report is 1830 – 1968.)

The consultant stated that a higher ratio of contributing structures would create a district that was more defensible in court. She also stated that the Historic District boundary needs to be identical to that boundary registered with the National Park Service, who requires that properties in the District have rational justification to include them (based on their guidelines); vacant lots are hard to justify. Lastly, she stated that a lower ratio of contributing resources could lead to losing the Historic District and/or the Certified Local Government status.

Regarding vacant land, the consultant stated that the purpose of a Historic District was to protect historic structures, not vacant land, and vacant land did not add to the historic significance of the District. This is true even if a historic event occurred on vacant land. There needs to be evidence of the historic activity that occurred there to be considered “contributing.”

LHDSC’s Boundary Changes:

The map titled “Northville Historic District Map – Illustration of Recommended and Confirmed Changes” shows three areas where the LHDSC didn’t agree with the consultant’s recommendation to remove non-contributing/vacant properties from the District boundary:

- **Area #2 on the map (SW corner of W. Cady St. & S. Rogers St.):** These two properties were retained so that the contributing property at 521 W. Cady St. was not so isolated. This change would also preserve the boundary in this location to support the possible future expansion of the Historic District south along S. Rogers St.
- **Area #3 on the map (South side of Cady St., Between S. Wing & S. Center St.):** This area was retained to provide a buffer to the District.
- **Area #4 on the map (North and South side of E. Cady St., Between S. Center St. & Griswold):** This area was retained because:
 1. Future plans for the area, illustrated in the Master Plan, expected HDC review and approval. This would ensure design elements would complement the District along the south side of E. Cady St.
 2. Retaining these properties would help protect the contributing property at 201 S. Center St. (on the southern border of the District).

Boundary Change Summary:

The decision of the LHDSC is reflected in the final draft of the Study Report and shows the vacant parcels on the south side of E. Cady St. have been retained in the Historic District. The LHDSC has the final say of what is included in the Study Report. However, as expressed by the consultant, the Committee needs to provide justification to substantiate a change.

Per the consultant, the benefits of *removing* the vacant parcels include:

1. The Historic District is more defensible in court.
2. The new boundary would meet the National Park Service’s guidelines for inclusion in the National Register of Historic Places.
3. A lower ratio of contributing/noncontributing could threaten the eligibility of the Historic District, or Northville’s Certified Local Government status.

Per the LHDSC, the benefits of *retaining* the vacant parcels include:

1. New development would be subject to the HDC’s design guidelines, ensuring design elements would complement the District along E. Cady St.
2. Protection of the contributing property at 201 S. Center St.

City Council members will need to review the Study Report, and determine if they have enough information to adopt the document as presented. This decision will include a determination of whether the LHDSC’s rationale to retain the properties along E. Cady St. is justified by the reasons given.

Local Historic District Study Report:

As mentioned above, the Local Historic District Study Committee proposed to add an explanatory statement regarding the information in the Study Report. The proposed statement reads:

"This Report is a living document with the information available at press time. Access to all areas of all properties by the surveyors was limited by the fact that they could not enter private property, and were therefore unable to visually verify all details of all buildings and structures."

Attached is the language inserted into the Study Report introduction.

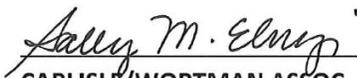
Additional Questions

The discussions of the Study Report brought up the following additional questions:

1. The Period of Significance for the Historic District is identified as 1830-1968. The end date is 50 years ago, which is a standard for considering whether a building is "historic." Concerns were raised that Northville's historic identity was centered more around the Victorian period, and not more modern times. Therefore, it was asked if the period of significance can be revised later (after the Study Report is adopted)?
2. Questions also arose about the "contributing" and "non-contributing" designation. Does this mean that a different standard is used to review exterior changes depending on if it is considered "contributing" or "non-contributing"?

City staff met to discuss these issues and has reached out to other historic consultants for additional information. Given the tight timeframe of the review and approval process, one approach would be for City Council to adopt the current Study Report and ordinance amendment as is, and refer these questions back to the Local Historic District Study Committee for additional research and analysis. Otherwise, the deadline will need to be extended again. We estimate that researching these additional questions, and revising and adopting the document would take an additional 6-8 months.

Very truly yours,



CARLISLE/WORTMAN ASSOC., INC.
Sally M. Elmiger, AICP, LEED AP
Principal

Cc: Dianne Massa