

**From:** Andi Heseltine  
**To:** [Historic Survey](#)  
**Cc:** [Adam Heseltine](#); [anatolasesi@gmail.com](mailto:anatolasesi@gmail.com)  
**Subject:** 248 Linden: Historic Survey Designation  
**Date:** Monday, September 24, 2018 5:03:50 PM  
**Attachments:** [Screen Shot 2018-09-24 at 4.54.25 PM.png](#)

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September 24th, 2018

Dear Historic District Study Committee,

We are the owners of 248 Linden in the Northville Historic District. We'd like to respectfully move that our property be considered a non-contributing resource within the current Historic District Report. Both our home as well as the garage are currently being identified as contributing, and the report considers them significant as it relates to National Register Criterion A for their role in Northville's community development and under Criterion C for architecture. We'd like to dispute that this home is significant under these criteria based on the information below.

***National Register Criterion A:*** *Buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, **AND** that are associated with events that have made a significant contribution to the broad patterns of our history.*

We've researched the property and the property's history within Mill Race Village & the Northville Historical Society. There is little that is actually recorded about the property beyond what's noted in the survey. It was built in 1928 and resided in by a pressman for the Northville Record and his wife until 1951. At that time, a blacksmith from Ford obtained the property along with his wife. There is little additional information about these residents that would suggest they made a significant contribution to Northville's history, nor that the property itself made any significant contribution to Northville's history. By all research, this

was just a standard home during the time of construction, built by regular residents of Northville, and has continued along that same course throughout the history of the home.

**National Register Criterion C: Design/Construction**

*This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet at least one of the following requirements:*

- *Embody distinctive characteristics of a type, period, or method of construction.*
- *Represent the work of a master.*
- *Possess high artistic value.*
- *Represent a significant and distinguishable entity whose components may lack individual distinction.*

We do not believe this property meets any of these requirements.

Per the National Register Criterion, "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, ***a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.*** The survey itself does not identify any distinctive architectural style for the home, and in fact the survey identifies a number of ways the home has been stripped of any distinctive characteristics of the time period. The porch has been enclosed, the siding has been updated to aluminum, the windows have been replaced with vinyl.

"Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology. A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. ***A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.*** We recognize that not many 1 story homes remain in the Historic District, and that ours is one of the only left. However, per these



guidelines, we don't believe that demonstrates significance, and in fact shows that it had little impact on later buildings.

"Represents the works of a Master" - A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. **The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.** There is no information related to the original builder of the home, and therefore cannot be found to be significant under this criteria.

"Possess high artistic value" - High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. ***A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.*** Our property is lacking in any specific design concept and is surrounded by properties with much greater emphasis on aesthetic ideals.

"Represent A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction" - A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historical context. ***In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.*** We do in fact believe that our home lacks individual distinction. By removing our home as contributing, we also don't believe we are sacrificing the overall historic character or integrity of the district, but are in fact improving the identity of the district by creating a stronger interrelationship of its truly historical resources.

Based on this criteria, we do not believe that 248 Linden is significant as suggested in the proposed Historical Survey. We have the utmost respect for the Northville Historic District as well as the Commonwealth Heritage Group, however we do believe this particular property was identified in error and we'd like to ask the Committee to reconsider the designation of 248 Linden as contributing, and move it to be a non-contributing building in the final report. If the property is unable to be reclassified, we'd sincerely appreciate the specific elements of the National Register Criterion that does deem this property significant so we can have a clear understanding of the classification.

We greatly appreciate your time, attention, and consideration to this matter and look

forward to a clear resolution based on the specific details of this property.

Best,

Andi Heseltine, Adam Heseltine, and Anatola Sesi  
Property Owners of 248 Linden

--

Andi Heseltine

O: 810-510-0667

C: 734-891-1299

[www.hesspropertysolutions.com](http://www.hesspropertysolutions.com)



## Dianne Massa

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**From:** PATRICIA THULL <PTHULL@msn.com>  
**Sent:** Monday, September 24, 2018 11:52 AM  
**To:** Historic Survey  
**Subject:** Comments for Public Hearing - Historic District Study Report

City of Northville  
Historic District Study Committee  
Public Hearing  
215 W. Main Street  
Northville, Michigan 48167

September 22, 2018

Dear Historic District Study Committee,

My family has had a stake in the City of Northville since the 1960's. I purchased my first property there in 1984 and my second in 1993, both on Randolph Street. (588, lot 456...002) and 572 Randolph (lot 456...001).

The Historic District signs that used to be on Randolph Street began with my property line at 588 Randolph, which was always considered to be the beginning of the Historic District. In my years in Northville, whenever I had an improvement, I went before the Historic District Committee for permission. Now, I cannot locate any mention of 588 Randolph whatsoever. And, if I am looking correctly, the boundary line that you show for the historic district looks like it cuts through the middle of my 588 Randolph house! The house at 572 Randolph is listed and described as having a very large lot, however, it is really 588 Randolph that has the larger lot. I am not sure why this is the case, however, I feel that there must be an error.

I am informed that sometime in the past, lot 456 was sub-divided. Thus, the lot designations 456...001 (572) and lot 456...002 (588). They were at one time one lot, one property. Both homes are circa 1822. 588 Randolph also has some significant historic elements.

How is it that the Historic District Study Committee can just eliminate part of a property from the Historic District? I am also concerned that the Historic District map does not properly reflect the actual properties or property lines. Also, what hardship will you have place upon me as the homeowner of both properties by suddenly splitting off part of one property? What if I wanted to again split the property into a third segment? How would that work within the historic district? What if I wanted the two properties to revert to one property? How would all of this be accomplished? It seems that you have restricted me as the homeowner. And, all without any notification.





I respectfully request that you maintain lot 456...001 and lot 456...002 (588 and 572 Randolph) as properties within the Historic District as has been the case for as long as my family has been in the community. Thank you for your consideration.

Respectfully,

Patricia A. Thull  
Historic District Homeowner  
248-345-3457  
pthull@msn.com





**From:** Elaine Robinson  
**To:** Janice Johns  
**Cc:** [arnolda@michigan.gov](mailto:arnolda@michigan.gov) ([arnolda@michigan.gov](mailto:arnolda@michigan.gov)); Dianne Massa; "Sally Elmiger" ([selmiger@cwaplan.com](mailto:selmiger@cwaplan.com)); Brandon Gabler  
**Subject:** RE: Objections  
**Date:** Tuesday, September 25, 2018 11:06:23 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hello Janice,

Commonwealth was contracted to advise the city the eligibility of the properties in Northville to meet the requirements of the NR and Local Historic District from the standpoint of historic preservation.

I have added Amy Arnold, SHPO, to this message since she and her colleagues are much more able to address any and all issues related to legality of the National Register and property owner rights. I've also included city representatives so they can be sure that the Study Committee is aware of your concerns and that they may come up during the Local District hearing.

Elaine

Elaine H. Robinson, Senior Architectural Historian  
3215 Central Street, Dexter, MI 48130  
p: (517) 262-3502  
e: [ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)

**From:** Janice Johns <[janice8175@gmail.com](mailto:janice8175@gmail.com)>  
**Sent:** Tuesday, September 25, 2018 10:56 AM  
**To:** Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)>  
**Subject:** Re: Objections

Thanks Elaine. I'll preface the following comments by saying I am an attorney but have never worked in historic preservation law. Still I am confident in finding and comprehending any applicable laws. How the laws are being interpreted in actual application, however, is the knowledge I'm lacking for these preservation laws.

The federal law I quoted does not make a distinction between types of nominations to the Federal Register (new or updates). I still believe property owners may object to inclusion on the FR and have the Sect'y evaluate eligibility. This matters because there are time limits for objections and appeals. Also because Federal Register listing is not only honorific, it qualifies the property, or district, for federal funding through grants and tax incentives. These grants are distributed through SHPO. The local governing unit makes the decisions on spending such funds in the historic district. Let me just say that the local governing unit's decisions on preservation have led to what we have today. I hope you can inform affected property owners at the meeting tonight what procedure to follow if they are objecting to the proposed historic district.

Thanks

Janice Johns

On Tue, Sep 25, 2018 at 9:13 AM Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)> wrote:

Hello Janice,

Let me preface my comments by saying I am not an attorney – so what I say is either how I have been advised by those who are, or by the SHPO, who work closely with an attorney.

The meeting on September 25<sup>th</sup> is regarding the updates to the Local Historic District, not the National Register (NR) nomination. They are two different documents that inform each other, but have very different purposes. The NR is an honorific listing that provides some protections to the historic resources, but this is relative to federal projects. Once listed on the NR, a property owner can do anything from changing the building to demolishing it without recourse. We hope they won't do that, but there is nothing in the legislation that will stop it. In contrast, the Local Historic District carries the protective measures, such as review of changes to a building by the Historic District Commission (HDC). It is at the local level that changes are approved or denied. The local historic district materials prepared by Commonwealth were done in part to provide additional material to the HDC so they could make informed decisions when approached with potential alterations to the historic fabric of a contributing building.

As you know, the Northville nomination was first made in 1972, when it was listed in the Register. The current project only updates that nomination with additional information on these resources and slightly modifies the boundary. Amy Arnold's statement that to protest inclusion in the NR the property owner would have had to do so in 1972 is correct. This is not a new nomination simply an update to the 1972 document.

If sufficient property owners object to their inclusion in the NR district, the district can be delisted. That would go through roughly the same process and would require a finding that the district no longer meets the requirements of the NR for inclusion. Having just completed this review process, I can confidently tell you that the district does still meet the requirement for inclusion. I hope this helps,

Elaine



Elaine H. Robinson, Senior Architectural Historian

3215 Central Street, Dexter, MI 48130

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e: [ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)

[commonwealthheritagegroup.com](http://commonwealthheritagegroup.com)



**From:** Janice Johns <[janice8175@gmail.com](mailto:janice8175@gmail.com)>

**Sent:** Monday, September 24, 2018 6:25 PM

**To:** Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)>

**Subject:** Objections

Hello Elaine

I'm hoping you can clarify something before tomorrow's meeting. The historic district survey was expected from its onset to result in modification of the historic district. The procedure for modification of a historic district follows the same local, state and federal law for establishment of an historic district. It appears to have all the same requirements, including publication of process, recommendation of proposed district, SHPO review, nomination to Federal Register. The National Historic Act Amendments of 1980, which became Public Law 96-515, and 36 CFR part 60 both provide that before any property or district may be included in the National Register, "the owner

of such property, or a majority of the properties within the district in the case of an historic district, shall be given the opportunity to object to the nomination of the property or district for such inclusion or designation."

I've just been told that Amy Arnold at SHPO has unequivocally advised that such objections cannot be made to nomination of the proposed historic district. She says the proposed historic district is the established existing historic district and the only time such objection could be made was at its nomination in 1972.

This does not sound right to me. If property owners Historic National Register listing must remain unobjected to regardless of new nomination for a changed historic district listing, there would be no need for the new nomination. Can you shed any light on this?

Thank you.

Regards

Janice Johns





**From:** Walsh, Todd (MSHDA)  
**To:** Sally Elmiger  
**Cc:** Arnold, Amy (MSHDA); Dianne Massa; Brandon Gabler; Elaine Robinson  
**Subject:** RE: Objections  
**Date:** Tuesday, September 25, 2018 4:34:23 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hi Sally,

Thanks for your email.

After reading through the previous emails attached to yours, I have identified several points made in that discussion that should be addressed:

1. What is the need for a "new" or updated nomination.
2. What is the status of the 2018 nomination in relation to the 1972 nomination.
3. How and when were property owners provided notice of the National Register nomination.
4. As far as the National Register is concerned, what is meant by the term, "property."
5. What is the process for objecting to National Register designation (also called "listing" or "listed in").
6. Can individual property owners "opt out" of a historic district.

Item 1

Earlier National Register nominations, such as the 1972 nomination for the Northville Historic District were created in a different time and environment and with different expectations. It is not uncommon in such nominations that a selection of resources were addressed in any length, and quite often only those that would have been considered "pivotal" to the district. Moreover, resources were often not classified as "contributing" or "non-contributing." Further, every resource within the boundaries of a National Register historic is considered to be listed in the district, however not every resource contributes to the significance of the district. Such documentation does not meet the current standards of the field, thus necessitating the need to differentiate between contributing and non-contributing resources. The grant project between the State Historic Preservation Office (SHPO) and the City of Northville sought to address these deficiencies. That is, provide additional documentation on all resources within the district at a level acceptable by contemporary standards.

Item 2

This project was conceived as providing additional documentation for both the existing (1972) National Register nomination and to the Local Historic District commission. This is stated clearly in the Scope of Work of the Certified Local Government grant between the SHPO and the City of Northville. As originally devised, the National Register work was simply that, "additional documentation." It was adding historical information to the existing nomination. However, as the consultants from Commonwealth Heritage Group (CHG) went about their work, they observed that significant changes had taken place within the boundaries of the existing National Register historic district. Their observation led them to suggest to SHPO to consider a boundary decrease. SHPO staff evaluated the information and concurred that the boundaries should be modified, which in this case meant a decrease. Coincidentally, this kept the NR district boundaries and the local historic district boundaries the same. The action of modifying the boundaries resulted in the 2018 additional documentation becoming a new nomination, as specified in 36 CFR Part 60 § 60.14, which states, "A

boundary alteration shall be considered as a new property nomination. All forms, criteria and procedures used in nominating a property to the National Register must be used."

#### Items 3 and 5

The SHPO is required to provide notice to both property owners and to the chief elected official. In the case of a nomination with more than 50 owners, 36 CFR Part 60 § 60.6(d) provides that "The State shall provide general notice to property owners concerning the State's intent to nominate. The general notice shall be published at least 30 days but not more than 75 days before the State Review Board meeting and provide an opportunity for the submission of written comments and provide the owners of private property or a majority of such owners for districts an opportunity to concur in or object in writing to the nomination. Such general notice must be published in one or more local newspapers of general circulation in the area of the nomination." The SHPO, through its agent (not CHG), published a notice in the *Northville Record* on August 16, 2018, which is 30 calendar days prior to the meeting of the State Historic Preservation Review Board on September 14, 2018. The notice appeared on page 6A.

Additionally, 36 CFR Part 60 § 60.6(g) lays out how property owners can object to listing. Specifically, "upon notification, any owner or owners of a private property who wish to object shall submit to the State Historic Preservation Officer a notarized statement certifying that the party is the sole or partial owner of the private property, as appropriate, and objects to the listing." SHPO received no objections to the National Register nomination, notarized or otherwise.

#### Items 4 & 5

Ms. Johns included in her email of 9/24/2018, a paraphrase of 36 CFR Part 60 relative to owner objections, writing "the owner of such property, or a majority of the properties within the district in the case of an historic district, shall be given the opportunity to object to the nomination of the property or district for such inclusion or designation." As noted above, the exact language of 36 CFR Part 60 § 60.6(g) states, "upon notification, any owner or owners of a private property who wish to object shall submit to the State Historic Preservation Officer a notarized statement certifying that the party is the sole or partial owner of the private property, as appropriate, and objects to the listing." This language and the nature of Ms. Johns inquiry raises the question of what is meant by "property." Relative to the National Register, "property" can mean any of the five property types as spelled out in the National Historic Preservation Act, 36 CFR Part 60, and section 5 of the National Register of Historic Places Registration Form: district, site, building(s), structure, and object. In the case of the Northville Historic District, the "property" is the historic district, and the individual buildings, sites, structures, and objects within the district boundaries are resources (contributing or non-contributing) within in the district, and not a "property" in the common, singular parlance. Additionally, 36 CFR Part 60 § 60.6(g) goes on to state that, "in nominations with multiple ownership of a single private property or of districts, the property will not be listed if a majority of the owners object to listing... Each owner of private property in a district has one vote regardless of how many properties or what part of one property that party owns and regardless of whether the property contributes to the significance of the district." All owners are provided a voice in the designation/listing process, and, as stated in 36 CFR Part 60 § 60.6(g), "the property will not be listed if a majority of the owners object to listing." The converse of that statement is if less than a majority of property owners object to the nomination, the district will be listed. What all of this means is that the individual resources of a historic district, whether contributing or not, cannot be and are not excluded from a National Register historic district based on owner preference or contributing/non-contributing status.



Item 6

Simply put, no. There is not mechanism for a property owner (or a particular resource) to opt out of a historic district. Owners, as stated above, may object, and if a majority of property owners object the district will not be listed. However, it is important to understand that even if 51% of property owners in the historic district opposed this nomination, or if it were not accepted by the Keeper of the National Register, the 1972 nomination, and all resources contained within the 1972 boundaries are still listed in the National Register.

Hopefully you find this information helpful. If you have any questions, please let me know.

Sincerely,

Todd Walsh

Todd A. Walsh, National Register Coordinator  
Michigan State Historic Preservation Office  
Michigan State Housing Development Authority  
735 East Michigan Avenue  
PO Box 30044  
Lansing, Michigan 48909  
[www.michigan.gov/shpo](http://www.michigan.gov/shpo)

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**From:** Sally Elmiger <[selmiger@cwaplan.com](mailto:selmiger@cwaplan.com)>

**Sent:** Tuesday, September 25, 2018 11:27 AM

**To:** Walsh, Todd (MSHDA) <[WalshT@michigan.gov](mailto:WalshT@michigan.gov)>

**Cc:** Arnold, Amy (MSHDA) <[ARNOLDA@michigan.gov](mailto:ARNOLDA@michigan.gov)>; Dianne Massa ([dmassa@ci.northville.mi.us](mailto:dmassa@ci.northville.mi.us)) <[dmassa@ci.northville.mi.us](mailto:dmassa@ci.northville.mi.us)>; Brandon Gabler <[bgabler@chg-inc.com](mailto:bgabler@chg-inc.com)>; Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)>

**Subject:** RE: Objections

Hi Todd:

I work with the City of Northville's HDC, and am assisting as staff to the Historic District Survey, Study Report, and updated National Register Nomination that is being conducted by Commonwealth Heritage Group (Elaine Robinson).

A Northville resident states below that she believes that any time information is presented to the Federal Register, property owners have the ability of opting out of the District. Northville's Historic District has been on the National Register since 1972, and the new survey is simply updating this information. It is not a new nomination.

We are having a public hearing this evening on the Study Report, and I would like to know how to respond to someone at the meeting asking about opting out. I spoke with Amy Arnold this morning and she referred me to you.

Thanks,

Sally

*SALLY M. ELMIGER, AICP, LEED AP  
PRINCIPAL  
CARLISLE/WORTMAN ASSOCIATES, INC.  
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Please consider the environment before printing this email

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**From:** Elaine Robinson [<mailto:ehrobinson@chg-inc.com>]

**Sent:** Tuesday, September 25, 2018 11:06 AM

**To:** Janice Johns <[janice8175@gmail.com](mailto:janice8175@gmail.com)>

**Cc:** [arnolda@michigan.gov](mailto:arnolda@michigan.gov) ([arnolda@michigan.gov](mailto:arnolda@michigan.gov)) <[arnolda@michigan.gov](mailto:arnolda@michigan.gov)>; Dianne Massa ([dmassa@ci.northville.mi.us](mailto:dmassa@ci.northville.mi.us)) <[dmassa@ci.northville.mi.us](mailto:dmassa@ci.northville.mi.us)>; Sally Elmiger <[selmiger@cwaplan.com](mailto:selmiger@cwaplan.com)>; Brandon Gabler <[bgabler@chg-inc.com](mailto:bgabler@chg-inc.com)>

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Elaine

Elaine H. Robinson, Senior Architectural Historian

3215 Central Street, Dexter, MI 48130

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e: [ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)

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**From:** Janice Johns <[janice8175@gmail.com](mailto:janice8175@gmail.com)>

**Sent:** Tuesday, September 25, 2018 10:56 AM

**To:** Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)>

**Subject:** Re: Objections

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Elaine H. Robinson, Senior Architectural Historian

3215 Central Street, Dexter, MI 48130

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e: [ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)

[commonwealthheritagegroup.com](http://commonwealthheritagegroup.com)



**From:** Janice Johns <[janice8175@gmail.com](mailto:janice8175@gmail.com)>

**Sent:** Monday, September 24, 2018 6:25 PM

**To:** Elaine Robinson <[ehrobinson@chg-inc.com](mailto:ehrobinson@chg-inc.com)>

**Subject:** Objections

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