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STATE OF MICHIGAN MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY LANSING

EARL J. POLESKI EXECUTIVE DIRECTOR

January 24, 2019

Ms. Darcy C. Schmitt
Senior Planner
Department of Building, Planning and Development
City of East Lansing
410 Abbot Road
East Lansing, MI 48909

Dear Ms. Schmitt:

Staff members of the State Historic Preservation Office (SHPO) have reviewed the preliminary historic district study committee report to modify the boundaries of the Oakwood Local Historic District. Our 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 on January 18, 2019 and they concurred with the SHPO comments. The report was sent to the Michigan Historical Commission for their review and they provided us with no further comments.

We appreciate the city of East Lansing's efforts to protect its historic resources. If we can assist you further, please contact Amy Arnold at 517-335-2729 or ArnoldA@michigan.gov.

Sincerely,

Brian D. Conway

State Historic Preservation Officer

BDC: ALA

State Historic Preservation Office Michigan State Housing Development Authority

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Staff Comments, January 2, 2019 Oakwood Historic District Boundary Modification, East Lansing

Unfortunately, the quality of the historic maps included in the report is poor and they will only be less readable when copied. SHPO discourages the use of color on maps to indicate boundary changes. When copied, color distinctions become meaningless so recommend heavy, dark lines solid and dashed. Please see the *Manual for Architectural and Historic Surveys in Michigan* (2018) on the SHPO website, which study committees are required to follow, for information on mapping. The use of maps with an existing and different color key was also confusing.

On page 19, the page numbers referenced in the text don't match the actual page numbers in the report.

What is labeled as historic context in the report seems to be more of a description of the district—there is little history included in the report beyond plat dates and the general periods of the different architectural styles. For example, the history of the Ridgely Park subdivision is minimal. Just including historic maps is not sufficient for a historic context. Study committees are required to undertake intensive level survey when establishing or modifying local historic districts. Thus, information on the individual properties and their owners should be included in the report. The report should also include a general summary of the trends and patterns associated with the development of East Lansing, the university, etc. during the historic periods associated with the properties within the boundary modification—the Depression era, World War II, and the post war years should be included. Architectural style should not be the only basis for historic significance—there should also be information on the associations with significant people and events. Some questions to answer might be: Who built or purchased homes in this neighborhood? How do they compare with the owners in the earlier homes built within the original district boundaries? What architects worked in the district? (Homes on Wildwood and Westlawn look as if they were architect designed.) Are there kit homes in the neighborhood? Houses such as 351 Southlawn and 331 Southlawn, look like they might be Sears or Aladdin homes. Some houses in the district exhibit characteristics of the federal FHA Small House program promoted through the New Deal. A good resource for this is the NPS Bulletin Historic Residential Suburbs. The context should also include more information about the history and development of the East Lansing High School and how it served the adjacent neighborhoods and the overall community over the years. Sample questions might include: Was it the main school for the entire community? Who was the architect and are there other examples of his work? Were the 1936 additions the result of New Deal PWA funding? When did it close as a middle school?

What is the period of significance for the district? Why are properties that are now 50 years old, such as 644 Hillcrest or 240 Southlawn being determined as non-contributing? There needs to be more context and a period of significance to justify these determinations.

It is problematic when the preservation organizations in a community work at odds with each other. The historic district study committee is using the decisions of the historic district commission as justification for removal of two modern apartment complexes in the district. This is a red flag that something is amiss. SHPO does not agree with the study committee's recommendation to remove the modern apartment complex at 332-392 West Grand River from the district. The massing and scale of this development is in keeping with the historic resources in the district. If these properties are removed then there will be no review by the historic district commission of any changes or new construction undertaken at the complex or its site. This could negatively impact the historic resources in the 300 and 400 block of Hillcrest as well as the setting and feeling of the historic Valley Court Park. Proposed work to the West Grand River complex should be reviewed by the historic district commission, otherwise there could be further deterioration of the district. We also disagree with the recommendation to remove the properties at 404 Evergreen Avenue from the historic district. These resources are in the middle of a block and removing them would be against the Secretary of the Interior's criteria found in National Park Service Bulletin 16A. Work undertaken to these resources should be reviewed by the historic district commission.

The count of historic to non-historic resources should show the original number when the district was created and what they will be with added resources.

The contributing/non-contributing list should include the name of the district, the name of the community, and a date.

400 Wildwood – Symmetrical is not an architectural style.

350 Wildwood – The report says it was built in 1971—is that accurate? If so, why is it considered contributing?

English Garden and English Cottage are not accepted standard architectural styles. These should be Tudor Revival.

The windows and details of the house at 341 Southlawn suggest it was not built in 1955. The list says it is 1927 while the form says 1955.

What does the field "Existing Historic Property" refer to on the inventory? Seems like the forms all say "No" in this field when the property is historic, so the meaning is unclear. Perhaps a key is needed? Why is a contributing/non-contributing field not included on the form?