

## Comment on Proposal to Designate an Inglis House Historical District and the Study Committee Preliminary Report

William Burnham  
2303 Highland Rd  
Ann Arbor, MI 48104

As a resident next door to the Inglis House and amateur history and architecture buff, I support the proposed designation. The Study Committee has made the case for it in their draft report, and the sooner it is done the better.

My comments are by way of a response to comments submitted by one Diana Giannola urging that the designation be delayed and that the historic district be expanded to include other houses in the Highland neighborhood.

1. The Dept of the Interior's Bulletin on Defining Boundaries (p. 3) (available here <https://www.nps.gov/nr/publications/bulletins/pdfs/Boundary.pdf>) states a presumptive default position in favor of making the legal boundary the boundary of the historical district:

- Current Legal Boundaries: Use the legal boundaries of a property as recorded in the current tax map or plat accompanying the deed when these boundaries encompass the eligible resource and are consistent with its historical significance and remaining integrity.

The chosen boundary of the 9 acre parcel corresponds to historical and current legal descriptions, tax records and zoning districts. Absent some overwhelming reason for not using it, it should be used.

2. The Defining Boundaries Bulletin also states on p. 3 [emphasis added]:

### ALL PROPERTIES:

- Carefully select boundaries to **encompass, but not to exceed**, the full extent of the significant resources and land area making up the property. . . .

### BUILDINGS, STRUCTURES AND OBJECTS

- Select boundaries that encompass the entire resource, with historic and contemporary additions. Include any surrounding land **historically associated with the resource that retains its historic integrity and contributes to the property's historic significance.** [emphasis added]

Also relevant is this passage on p. 1 of the Defining Boundaries Bulletin:

Select boundaries that define the limits of the eligible resources. Such resources usually include the immediate surroundings and encompass the appropriate setting. However, **exclude additional, peripheral areas that do not directly contribute to the property's significance** as buffer or as open space to separate the property from surrounding areas.

Just how the other houses in the neighborhood “directly contribute to the [Inglis House’s] significance” as a historical property — except perhaps by way of contrast — is not explained by Ms. Giannola.

3. Ms. Giannola quotes from the State Preservation document: “a single resource historic district must be distinguishable from the surrounding resources in the immediate vicinity by virtue of geography, historic significance, or integrity.” She asserts that this requires inclusion of other homes and properties in the neighborhood. However, two sentences later, this broad statement is explained and refined by giving examples of impermissibly narrow boundary definitions: “**one bungalow in the middle of a neighborhood of bungalows, or one Queen Anne or Italianate house in a larger neighborhood of Victorian style homes.**” A casual glance at the houses in the surrounding neighborhood reveals that the Inglis House hardly could be equivalent to “one bungalow” among many. This is especially so when one compares houses, like ours at 2303 Highland, that are closest to the Inglis House. The Inglis House is indeed unique in the neighborhood, both in terms of historically, culturally and architecturally. There is, quite simply, nothing like it in the neighborhood.