

OPEN LETTER TO THE HISTORIC DISTRICT COMMISSION

DISTRICT: Old Fourth Ward

DATE: April 11th, 2019

RE: 530-532 North Division Street – Contributing vs. Non-Contributing Status

At issue is whether the residential building at 530-532 North Division retains historic significance as a contributing structure or is an historic resource in the Old Fourth Ward Historic District or whether the designation could be amended to Non-Contributing.

HISTORY:

The first home on this lot was built in 1866 by John Goetz, the owner of a saloon in the railroad depot. Between this time and 1925, the building underwent a major change twice, being added onto and then having that addition move. Several of the structures on the lot moved or changed in that period as well.

In the years between 1929-1931, another home was added to this structure, and a new low-slung roof was extended over both structures to create a new and inexpensive roofline. The structure was re-built to be a tenement house.

In the period from 1866 to 1931, a total of 65 years, this structure underwent three major changes to its form. There are no visible defining historical features remaining that one can discern from any of those incarnations with the exception of the present form, a radically different style, shape and massing from the original incarnations. If there is one defining historical feature of this building, it is change over the years.

APPLICABLE REGULATIONS:

From the Secretary of the Interior and the State Historic Preservation Office, and included in the City of Ann Arbor Historic District Design Guidelines:

CONTRIBUTING RESOURCES:

A contributing (historic) resource is one that adds to the historic association, historic architectural quality, or archaeological values for which a property is significant because it was present during the period of significance, relates directly to the documented significance, and possesses historic integrity.

The definition of a Contributing Resource can be broken down into a series of questions; according to the staff report, **ALL** of the following **MUST** be answered with a yes:

1. Was the resource present in the period of significance (prior to 1944)? **YES**
2. Does the resource relate directly to the documented significance of the historic district?
Based on the definitions of these words and the documentation that exists, we do not believe this can be answered unequivocally yes. We respectfully disagree with the

conclusion that this property relates DIRECTLY to the documented significance of the Historic District.

- a. A contributing resource should **ADD** to the to the historic association or historic architectural quality or archeological values for which the **significant** properties are significant. We do not believe this property actively adds to these qualities, in fact at present we believe it detracts from it.
 - b. In addition to the property's place in time, to achieve this character the property must also relate directly to the values listed above.
 - i. The only documented significance of the property as a "complementary structure" as almost every non-historically significant structure in the OFW was designated in 1982. From that report: "they contribute to the **overall** historic character of the district by providing a complementary setting for the more outstanding structures...**they establish the basic neighborhood characteristics of style, mass and scale**"
 - ii. By this documented significance, the structure does not relate **DIRECTLY** to the documented significance of the historic district, only **INDIRECTLY** by place in time, and the mass and scale of the building. **By contributing to the OVERALL significance as a collection of homes, it is not unequivocally that complimentary structures DIRECTLY relate – only the features that keep the neighborhood in scale with other structures.**
 - c. None of the proposed changes to the structure do so in a manner that is inconsistent with the other homes in the neighborhood. If anything, it would become closer to them in style.
3. Does the resource possess historic integrity? **Only if the definition of Historic Integrity can be based on place in time, scale and massing as its sole historic features - there are no other defining historic elements. We respectfully disagree that this particular resource possesses historic integrity simply by being a house in the OFW that was there in 1944.**
- a. What is the historic integrity of this home? The staff report lists footprint and massing, and possible wood clapboard siding under layers of siding (this has not been confirmed).
 - i. It is our contention that these features make the house contribute to the **CONTEXT** of the neighborhood, but do not in themselves make this home have historic integrity
 - ii. The latest incarnation of this house actually removed any historic integrity that earlier versions may have had – no other house on the block has this type of massing, and the house's roofline does not line up with those on either side of it.
 - iii. The home was not combined or renovated to be of any particular architectural theme or significance. It was simply the cheapest roofline and roof that could be applied.
 - b. This home has undergone three major alterations in the period of significance. Few (or none at all) clearly historic features that have defined this property remain. There is no evidence of what prior versions of this resource looked like when they were built.

- c. The style retains no historic significance. The structure has been majorly altered multiple times and retains no definitive features of any time period. The home was altered to be an inexpensive tenement house just prior to the end of the period of significance.
- d. Any defining historic features are conjecture at best. The house has changed shape multiple times and many features of the various incarnations have been moved or changed.
- e. None of the proposed changes would alter the historical integrity of the house in terms of use, place, footprint, or massing outside the context of the rest of the neighborhood.

NON-CONTRIBUTING RESOURCES:

A non-contributing (non-historic) resource is one that does not add to the historic architectural qualities or historic association of a district because it was not present during the period of significance, does not relate to the documented significance, or due to alteration, additions, and other changes it no longer possesses historic integrity.

The definition of a Non-Contributing Resource can be broken down into a series of questions; according to the staff report, a resource is non-contributing if **ANY** of the following **CAN** be answered with a yes:

1. Was the resource built after 1944? **NO.**
2. Does the resource not relate to the documented significance? **NO.**
 - a. It is worth noting that the only items on the staff report that make it contribute to the neighborhood are style, scale and mass. The project as presented does not substantially change any of those items out of context with the rest of the neighborhood.
 - b. Also noted are that during the period of significance, this resource underwent three major changes in form in 65 years. Is it possible that change is a historic characteristic of this home?
3. Does the resource no longer possess historic integrity due to alteration, addition and other changes? **Respectfully, we disagree with the staff report on this point and believe this CAN be answered YES.**
 - a. During the period of significance, this resource underwent three major changes in form in 65 years. Is it possible that change is a defining historic characteristic of this resource?
 - b. The style retains no historic significance. The structure has been majorly altered three times and retains no definitive features of any time period. The home was altered to be the cheapest way to make a tenement house just prior to the end of the period of significance.
 - c. Any other defining historic features are conjecture at best. The house has changed shape multiple times and many features of the various incarnations have been moved or changed.

- d. None of the proposed changes would alter the historical integrity of the house in terms of use, place, footprint, or massing outside the context of the rest of the neighborhood.

CONCLUSION:

This structure has seen three major changes in the period of significance for the first 65 years of its life. There are no defining architectural features that make it significant other than its place in time. Even the scale and massing have undergone major change more than once, and most surrounding structures have changed as well. The structure's style is its least significant feature.

Since the last major change, the property became blighted and has had every surface changed. There are no defining historical features, materials or historic integrity that remain for this structure or any of its incarnations. Any statements about original or historical features are purely conjecture. Major change has defined this building from the start, and for most of its life.

As such, this structure in and of itself retains no historical character other than being a home in the OFW that existed for part of the period of significance. **We feel it is within the purview of the HDC and that there is ample latitude in the Secretary of the Interior and the State Historic Preservation Office guidelines to rule that this structure is a non-contributing structure, and for the HDC to still retain the rights to approve a project that adds more value and context to the OFW historic district.**

There are many truly historic and significant structures in the Old Fourth Ward that clearly contribute directly to the fabric of the neighborhood and its historic character as it has been preserved. This structure is not one of them.

Part of the richness and architectural diversity that define the Old Fourth Ward are in contrast to the idea that all structures should be frozen in time based on an arbitrary date. Change has defined this structure and surroundings from the start, and periodic change is much more in context with its history and the surroundings than a static building.

This home does create context for significant historical structures in that it is a residential home in the district of a certain size and scale, but we would argue that is an indirect relationship and it should not prevent the rehabilitation and redevelopment of the structure to be MORE in context with the neighboring homes and the OFW historic district.

We would ask the Ann Arbor Historic District Commission to consider a public hearing to determine if the resource at 530 & 532 North Division is of such direct historical importance as to deem that the shape of the roof in its current form can never change, or if the structure can be deemed non-contributing to allow re-development in a manner that the neighborhood supports and with sensitivity to the immediate area, the OFW historic district, the City of Ann Arbor, and to the gestalt of buildings and developments yet to come.