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May 5, 2010

Via First Class Mail

Ms. Jill Thatcher
City of Ann Arbor
Planning Department
100 N. Fifth Street
Ann Arbor, Michigan 48104

Re: Comments on the Preliminary Report of the Proposed Fourth and Fifth Avenue Historic District Study

Dear Ms. Thatcher:

This letter is submitted on behalf of the Fifth Avenue Limited Partnership to highlight the deficiencies of the Preliminary Report, Proposed Fourth and Fifth Avenue Historic District Study, dated February 16, 2010 ("Report") prepared by the Study Committee regarding the proposed historic district. In summary the Report fails to provide a legitimate basis on which to establish a historic district for three general reasons:

- (1) There is no credible justification of the suggested boundary.
- (2) There is no analysis of the many prior studies of resources that are located in the proposed historic district. Those prior studies rejected historic designation of resources in the study area, and the Report provides no explanation of what has changed so as to determine the study area as historic.
- (3) The Report lacks a credible analysis and evidence of the required evaluation criteria to establish a historic district.

These failings highlight the one clear conclusion that can be made: the Report is designed to impose Historic District Commission review over all work, including construction, addition, alternation, repair, moving, excavation or demolition, on the real property in the proposed historic district. This includes the Heritage Row properties. The proposed historic district is designed to prevent the Heritage Row project, not to preserve any historic quality of the structures in the proposed historic study area.

Ann Arbor City Ordinance, Ord. No. 4-07, Sec. 3, 3-19-07, Ch. 103, Sec. 8:405 *et. seq.* requires that the Study Committee prepare the Report which shall address, at a minimum, the following:

C o u n s e l o r s A t L a w

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- (1) To determine the total number of historic and non-historic resources within a proposed historic district and the percentage of historic resources of that total. In this regard, the Report must follow the Secretary of Interior standards set forth in 36 CFR part 60 and any other criteria established by the State Historic Preservation Office ("SHPO").¹ Sec. 8:408.
- (2) "The historic district or districts studied;" and
- (3) "The significance of each district as a whole, as well as a sufficient number of its individual resources to fully represent the variety of resources found within the district, relative to the evaluation criteria."

It should be first noted that the proposed historic district extends into areas that were not authorized by the Ann Arbor City Council in its resolution dated August 17, 2009 charging the Study Committee with the task of producing the Report. The boundary recommended impermissibly extends to include properties on Packard Street. Without such authority, the Report does not comport with the legal requirements and cannot serve as a basis to adopt a historic district ordinance.

The Report failed to determine the total number of historic and non-historic resources within a proposed historic district and the percentage of historic resources of that total.

The Report does not determine the total number of resources in the proposed historic district. A resource is a publicly or privately owned historic or non-historic building, structure, sites, objects, features, or open spaces located within a historic district. Sec. 8:407. No where in the Report is there such an inventory. The Report identifies, apparently, all 47 buildings in the proposed historic district, but does not identify all resources as required by ordinance and statute. The Report also apparently identifies non-buildings as historic resources, acknowledging that such items are resources, but, again, fails to identify all resources. Consequently, it is impossible for the report to comply with the percentage of historic resources. Therefore, the Report cannot serve as a basis to establish a historic district.

¹ The Michigan State Historic Preservation Office requires the following:

"The criteria that a historic district study committee must apply when determining the historic significance of historic resources and the boundaries of historic districts are the criteria and considerations developed by the U.S. Secretary of the Interior for the creation of historic districts, as set forth in National Register Bulletin 15: How to Apply the National Register Criteria" ("Bulletin 15")

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The Report failed to address prior "historic district or districts studied."

The Report acknowledges that portions of the study area were part of other "surveys" in the following years 1973, 1975, 1976, 1978, 1982, 1988, and in 1990. In fact, the entire City of Ann Arbor had been exhaustively studied over the years to determine historic resources and proposed historic districts. Beyond the literal one sentence about these prior studies, nothing was addressed, and consequently, the Report fails to meet the legal requirements in this regard. For example, the Individual Historic Properties Historic District Study Committee studied a multitude of properties in the 1994 timeframe for their historic nature. The Report fails to mention or discuss any of these prior studies, the inventory, the analysis, and the conclusions. It is remarkable that with the significant historical study that was conducted, none of the resources mentioned in the Report were determined to be sufficiently historic to warrant the establishment of a historic district. It is also remarkable to note that only ten of the 46 claimed historic resources in the Report were identified in the prior studies as having any historic value. And, interestingly, the ten were identified as having architectural significance, and not having any association with any historically significant event. The obvious question arises of "what has happened since then." The answer, of course, is nothing. Therefore, the result should be the same. There is no justification for a historic district.

The Report fails to address the "significance of each district as a whole, as well as a sufficient number of its individual resources to fully represent the variety of resources found within the district, relative to the evaluation criteria."

This is a lengthy aspect of this letter. First, it should be noted that the Report simply summarizes the evaluation criteria but only provides two pages of analysis regarding 46 alleged historic resources to demonstrate compliance with the referenced criteria – an incredibly weak and short analysis which is reflective of the lack of evidentiary support for a historic district.

There is no principled basis for the suggested boundary

The boundary justification in the Report has no cohesive rationale which, upon closer examination, is logical because there is no historical significance to this area and the structures. Even the fact that the buildings are relatively old is not particularly significant because so are many, many others in Ann Arbor. Even the fact that the buildings can be described architecturally as having a certain style (e.g. Queen Anne) is not significant because there are hundreds of such similarly aged homes and of a similar style in Ann Arbor.

Historic districts are typically a concentrated area of contiguous resources. Historic district boundaries should be based on three factors: (1) historic significance,

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(2) physical integrity of the resources, and/or (3) the location of significant geographic features. While boundaries based on integrity and geography are determined by observation, boundaries based on historic significance are identified on the basis of research. The boundaries for this proposed historic district do not follow the standards because buildings located on immediately adjacent streets were also built during the same time period and in the same varied architectural styles found in the proposed historic district. The buildings located in the proposed district cannot be distinguished from the surrounding properties and the proposed boundaries are, thus, completely arbitrary. The Report also fails to reflect the fact that large areas in the proposed historic district are asphalt parking lots. (This is reflective of the Report failing to identify all resources in the proposed historic district). The fact that the district boundaries were defined by the Ann Arbor City Council in its resolution dated August 17, 2009 is not justification for the boundaries. The Report must justify each individual directional boundary of the proposed district according to the guidelines developed by the U.S. Secretary of the Interior. The boundary justifications should include a concise explanation of why the boundaries were chosen based on geography, integrity and/or significance, and address any irregularities in the boundaries and why they are there. The Report does not.

Moreover, the Report fails to tie any historic event or even theme to the boundaries. It references three "themes" as being "Yankee settlement," "German settlement," and "University of Michigan settlement," but these are not historically significant events, individually, and the Report is devoid of any significance of the interrelationship of the three to justify a period of significance as spanning 1838 to 1941. Interestingly, why 1941 was picked as the end date is a mystery in light of the fact that the Report states that German immigrant and descendents lived in the area until the 1960s. It uses phrases such as the area to the south are "marked by residential areas illustrating contextual theme separate from those of the proposed district" without explanation. Simply stated, the Report provides no reasons as to why this area as opposed to any other area in Ann Arbor that has similarly aged structures is historic.

The National Register, Bulletin 15: How to Apply the National Register Criteria for the creation of an historic district states:

A district must have a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

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The Report also fails to document the three themes referenced property through any accepted means of historical or archeological research, to have existed at the time of the event or pattern of events and to have been associated with those events. Importantly, there is no respected reporting of such themes as being tied to the proposed historic district area. The criteria clearly establish that a building is not historic if its "associations are speculative.

The Report provides some history of the buildings but there is no significant event related in the report, no reference to significant and important historical persons, and limited architectural history. It seems as if the Study Committee looked at the history of the individual buildings and cobbled together three themes to justify a period of significance to make up the entire timeline of construction of the buildings in the proposed historic district.

The Report provides the history of certain persons who lived in the proposed district but does not describe how those persons are historical figures, and how the building contributes to the narrative for the person or any significant historical event.

For a property to qualify as being historic, it must meet the following criteria from the National Register Criteria for Evaluation:

- (1) Being associated with an important historic context; and
- (2) Retaining historic integrity of those features necessary to convey its significance.

The Study Committee is required to assess the following to determine historic integrity:

- (a) Define the essential physical features that must be present for a property to represent its significance.
- (b) Determine whether the essential physical features are visible enough to convey their significance.
- (c) Determine whether the property needs to be compared with similar properties. and,
- (d) Determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.

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And, historic resource must have at least one of the following criteria to be significant, but none of these criteria are explained in the Report:

- (1) Criterion A: that are associated with events that have made a significant contribution to the broad patterns of our history

The Report does not identify any specific events that have any historic significance other than that they occurred. The report speaks to the early settlement by American Yankees, residency by ethnic Germans and then residency by persons who studied or worked at the University of Michigan.

The Report also references the immigration of ethnic Germans but acknowledges that the most significant German immigrant settlement was actually in the Old West side. There is no explanation as to why German residents in the study area is significant. The report only makes assertions of fact with no references or evidence to back up the claim that this immigration event is significant to the City of Ann Arbor history.

- (2) Criterion B: that are associated with the lives of persons significant in our past.

The Report claims that there were three homes that were the residences of three mayors and a superintendent of Ann Arbor Public schools. But, there is no explanation as to why those persons were significant other than the statements of the offices held; what they accomplished; why they are historically significant, and, most importantly, why and how the structures are connected to such history.

According to Bulletin 15 section VI,

The persons associated with the property must be individually significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

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Not Eligible

A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgment can be made because either research has not revealed specific information about the person*s activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

The Report fails to provide any historically significance references specific to the accomplishments of the persons identified in as homeowners or residences of the buildings.

- (3) Criterion C: that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Nothing the Report suggests the work of a master or high artistic value of a vast majority of the structures in the district. In fact, the Report only provides evidence that only one house was actually designed by an architect the house at 438 South Fifth designed by Herman Pipp (of an Arts & Crafts design).² While alluded to in the Report, there is no evidence that Henry Richardson had any involvement in the Bethlehem Church (or any other buildings in the proposed historic district), and there is no explanation of how Richard Rasemann (the architect for the Bethlehem Church) was patterned after any Richardson design. These are statements made in the Report adjacent to each other to given the impression that there is some relationship, but there is not detailed in the Report. Similarly, there is no evidence provided of any connection between the Rail Depot and the Bethlehem Church design.

² Moreover, simply because a building was designed by a noted architect does not mean it is historic. "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. A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although It might meet other portions of the Criterion, for instance as a representative of the Prairie style." Bulletin 15.

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The Report covers at length the styles of the houses but provides no connection between the housing styles and any sense of history. For example there is no connection between Greek Revival, Queen Anne, Italianate, or Colonial Revival design and why that may have been important to German immigrants. The Report fails to establish how the design and construction of each building is significant.

The Report tries to make a connection between nearby lumber mills and the construction of the various architectural style, but there is no evidence provided that any of the materials used for the buildings came from the Kerrytown lumber mills. Additionally, there is no credible reporting that the buildings are substantially similar to their original appearance.³

The Study Committee prepare survey sheets for each building which listed the style of the house and the materials of the foundation, walls and roof, but there is no analysis as to why such features are historically significant. The Report does not explain whether any of the materials are original or important, or not. Street level inspection reveals that many buildings have been altered and have vinyl or aluminum siding, non-original windows, back staircases, and other non-original features. In this regard, Bulletin 15 states.

Properties eligible must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.

³ According to Bulletin 15, sec. VIII

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style. In terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

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If the historic exterior building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured.

There is no principled way gleaned from the Report to determine why all buildings were determined to be historic which begs the question of what would it take for the Study Committee to determine that a building was not historic? The Report does not provide any reasons why most of the houses are historic other than its basic style and its age. Bulletin 15 also provides that the Report must define essential features that must be present for the property to be considered historic. There is no explanation of why claimed features are historic. For example, there is no explanation of why a chicken wire fence is significant to German immigrants. Was chicken wire (apparently a historic feature), a symbol or especially important to such residents? Or was it run of the mill that is just old.

This is especially the case where the house have been modified from single family occupancy to multiple family rental units. This also raises the question of whether the Report truly asserts that the rental units on Fourth and Fifth Avenue are historic. Many of the structures have been modified to include front porches, back stair cases and the like. The Report disregards the impacts of these which generally are disqualifying features. See Bulletin 15, which states as follows:

If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

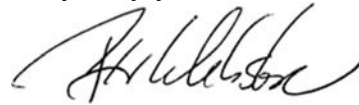
Lastly, the methodology of the Study Committee must be questioned and investigated. During its review, the Study Committee used panoramic maps of Ann Arbor to somehow verify the age of homes, determine if there were any changes to the homes or structures over the years, and to verify the historic integrity. The Report fails to provide any authenticity or accuracy of such maps. There is no evidence to suggest that they are accurate for the purposes used. Additionally, the Study Committee did not undertake a photographic array study of the structures. That is, they did not document historical (i.e. old) photos of the structures against the new photographic inventory. Further, the commentary at Study Committee meetings was replete with admission that

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much of the information was guess-work and speculation. Examples of improper and unsupported conclusions can be seen in the Report itself (e.g. the conclusion that Uri Bassett **probably** built the house located at 450 South Fifth Avenue). This did not occur because it is likely that such photos do not exist. This, further, is evidence that the structures are not historic – they were not significant enough to document them in any pictorial history or remembrance.

Also, while the Study Committee meetings were open to the public, the Study Committee failed to keep meeting minutes of its meetings, failed to make a record of its decision making, including a record of the reasons why a district should not be established. And, while not required, it certainly could have sought input from the property owners in the proposed historic district. In light of the fact that a majority of the property owners as depicted on the property tax rolls oppose the establishment of a historic district, the Study Committee would have been well served by an effort to include them in the process beyond the minimum mandatory requirements which is limited to the public hearing which is being held tonight. In that regard, I ask that this letter be included in the hearing record. Thank you for your kind attention to this matter.

Very truly yours,



Peter H. Webster

PHW/mal

BLOOMFIELD 29488-8 1053268

C o u n s e l o r s A t L a w

DETROIT NASHVILLE WASHINGTON, D.C. TORONTO PHOENIX
BLOOMFIELD HILLS ANN ARBOR LANSING GRAND RAPIDS

May 14, 2010

Dear Members of the Germantown Historic District Study Committee:

Thank you for your work in helping to protect the historic neighborhood of Germantown. Before the public comment period closes, I would like to take this opportunity to make a few suggestions regarding the themes and boundaries of the historic district. These ideas are inspired by: (1) my familiarity with the neighborhood as a long-term resident (since 1988), (2) my research into the history of the neighborhood, (3) the letter to you from Alex de Parry's attorney, and (4) the Secretary of the Interior's Guidelines regarding boundaries.

Based on the above, I conclude that it is essential that the Germantown Historic District include the streets that are most intact: namely, the 500 block of S. 5th Ave between Packard and E. Madison as well as E. Jefferson between S. 5th Ave and Division. The boundary in the draft report is arbitrary and is not based on themes that withstand scrutiny. The hill on S. 5th is not a strong enough topographic feature (like a mountain or a river) to be a dividing line, especially since many of the houses south of Packard are on approximately the same elevation as the other houses in the district.

I respectfully suggest that you revise the boundaries so as to include the entire Germantown Neighborhood as defined by the neighborhood association on the registration form that was added to the City's website on 2/23/09. In addition to the area within the association's boundaries, I recommend that you include the 4 houses on the south side of E. Madison across from Walter Spiller's properties. These houses have historical significance and one is the R. Wallenberg house. Omission of the Wallenberg house is inappropriate as his contribution had a direct connection to Germany: helping to save the lives of Jewish people in the Nazi era. Also, it would be odd to end the historical time period just prior to his work, given that it is crucial that the whole story be told. According to the Secretary of the Interior's Guidelines, the 500 block of S. 5th Ave must be included because it is more intact than the 400 blocks of S. 4th and S. 5th (which lost houses for the creation of the Detroit Edison substation as well as for parking lots). As the guidelines strenuously insist on the inclusion of the most intact historical resources, E. Jefferson between S. 5th and Division must also be included. Aside from a wonderful set of houses, please note the iron grille fence at #318 E. Jefferson.

The following themes unite the blocks north and south of Packard and are good candidates as the core themes for the historic district:

(1) Early German settlement, especially the arrival of Jonathan Henry Mann and his family in 1830 and the numerous houses they came to occupy in Germantown: 3 houses on S. 5th including the yellow and beige Victorians (#528 and #526) and the Italianate house (#532), 3 unmarried Mann sisters lived at

319 E. Jefferson, and Mann's also lived on Packard and in the 400 block of S. 5th. The Mann's still own #532 S. 5th and there are 8 generations of Mann's associated with this block from the earliest German settlement in Ann Arbor up until the present day. This is a unique and important connection. The first Mann wrote the letter to Basel that requested a pastor and this led to a long association between the Mann's and the Schmid's who intermarried. It was clearly one neighborhood, with family members on both sides of Packard. The Schmid and Mann story shows that the south side of Packard cannot be omitted from the historic district.

(2) Another important theme is the fact that the people who lived in the area outlined above were the owners of the businesses on such downtown streets as Main and Liberty. This is true for both the 500 and the 400 blocks of S. 5th. For example, the Mann's and Eberbach's owned drug stores, and there were numerous other businesses as the committee doubtless recognizes. This was a neighborhood that housed the early entrepreneurs of Ann Arbor. My research shows that the social and economic divide mentioned in the draft report is illusory. There is no evidence that this side of Packard housed the mill workers. Instead there are many examples of people who were doctors, lawyers, engineers, and owners of important businesses such as Mann Brother's Druggists, Fiegels, and so forth. The committee report also missed the fact that an important mayor and alderman, William G. Doty, elected in 1891 and 1892, owned the Greek Revival at 538 S. 5th. It is important that the report not make selective mention of individuals and properties in order to support an incorrect theory—otherwise it will be strenuously contested. The theory that the area to the North differed from the area to the South of Packard in regard to its social fabric is such a theme. Both areas have been an economic and social mix, but the area to the south of Packard probably has more homes from the 1860s—I can think of several on the 500 blocks of S. 4th and S. 5th. (The paucity of deed research by the committee is a serious weakness in the report.)

(3) In reviewing the directories, it is clear that many houses had both "residents" and "boarders" and the boarders were not only students but also dressmakers and bookkeepers and others who did not own their own homes. This pattern connects the blocks north and south of Packard as it was true even for the Grand homes now owned by Alex de Parry. There was also upward mobility, with renters later becoming homeowners. This pattern is very similar to what we have today and connects the neighborhood to its history. (For example, my husband and I started out as renters at #545 S. 5th and lived here for 7 years before purchasing our home.). Many students and young professionals continue to rent in this area and many of us have "boarders."

(4) The neighborhood still retains important historic landmark buildings that are larger than the rest and that played a major role in local history and culture. The boundaries should be anchored by these landmark buildings: Bethlehem Church, Perry School, and 109 E. Madison (whose historic significance was the

topic of a thesis or report by Tom Whitaker for E. Michigan University). Cutting any of these buildings out of the neighborhood does not make sense.

Thank you for your consideration of these points. I am also sending you my notes on my interview with John Mann.

With cordial regards,

Beverly I Strassmann



The Mann Family of the 500 Block of S. 5th Ave (between Packard and E. Madison) (as told on May 5, 2010 to Beverly I Strassmann by John Bates Mann, who resides at 2700 N. Parker Rd, Dexter 48103, tel: 734 426 4039)

Mann Genealogy (photos are on display in the Mann home):

(1) Jonathan Henry Mann

b. 1784 in Ludwigsberg, (in Wurtemberg) Germany
m. Julianne Haller

Came to Ann Arbor in 1830. He and Allmendinger met in Reading Pennsylvania and were the two first German settlers in Ann Arbor. After a few years, Allmendinger moved to Lodi township, but the Mann family remained in A2. Both men were brought here by John Allen, one of the two founders of A2 (the other was Rumsey). Jonathan Henry Mann was the person who wrote the letter to request the pastor (Frederick Schmid) for the first German Church. Schmid married Jonathan Mann's daughter and was President of TCF Bank. Jonathan Henry Mann's profession was tanning and he traveled the world setting up tanning factories in the 1810s, including a factory in Mexico City, among others. He had a tannery in A2 at 1st and Liberty (Blind Pig).

(2) Emmanuel Ernest Mann

b. 1814 in Stuttgart, Germany (prior to his parent's emigration)
m. 1841

He probably worked with his father in the tannery as a boy. Later he established the Emanuel Mann Druggist on Main Street. He had ~11 children, including 3 unmarried daughters who lived in the house on the West corner of Jefferson and Hamilton Place. He raised his children in a small house that still stands on the SE corner of Division and Liberty that was built in 1840 and has an historic plaque. Emmanuel had a farm across from the U of M Press Box. It was a large tract encompassing Main St., Stadium, S. 7th, and Pauline. The huge farm house was white with a large porch and is clearly visible on the 1874 County Atlas. The AAA tore the house down for their parking lot at the time that historic preservation began to be discussed in A2. John feels that this is deeply regrettable.

(3) Eugene George Mann.

Died in 1920 or so, his wife died around 1940 roughly.

Graduated from High School in 1874 and received a degree in Engineering from the U of M in 1878. He moved out West and wrote letters home that the family still has in its possession. He had a hearing problem and was mistreated for it during his travels. After his return he got a degree in Pharmacy. He worked with his brothers in the drug store and it became Mann Brothers Druggists. The family still has bottles with the original and later name of their store. Eugene George built #528 S. 5th Ave in 1893 or 1894. He purchased the land in 1893 from Frederick Blake and his wife. One of his daughters was Anna Mann who was born in 1888 and died in 1986 (98 years old). She always said that the "pine tree" behind the house was planted the year she was born. She lived in #528 her whole life, save the last two, which she spent in a retirement home. Shortly after

graduating from high school she went deaf and her boyfriend broke up with her. In photos one can see her standing on the front porch of #528 in a white blouse and long dark skirt. Cynthia Kokkales lived in the neighborhood (#544) in the 1960s and described Anna as reserved and not entirely comfortable that Greeks had interloped into this staunchly German neighborhood. Anna inherited #528 and #532, the latter she remodeled in the 1940s. #532 was built in 1860 and the family still has the title and abstract for these properties going all the way back to Rumsey who cofounded A2 with the purchase of 160 acres in 1824 during the presidency of James Monroe. These 160 acres included the present S. 5th Ave and S. 4th Ave. By 1825, Rumsey had already sold 8 acres to Benjamin H. Packard. Later owners of the property now designated #532 included William R. Thompson (1836), and Charles Thayer, Morgan, Maynard, and Denton (also 1836). The other children of Eugene George Mann were Hugo and Erwin. Erwin started the Big 10 Party Store.

(4) Hugo Emmanuel Mann.

He was a banker who died at age 36 before the advent of Penicillin.

(5) Eugene John Mann

Worked for Michigan Bell as a supervisor and owned about 10 houses in A2. He bought the beige Victorian from Christian Rayer who had a farm on Packard Rd. The number of this beige house may be #526 and together with #528 these two houses make a matching pair, though only #528 has the lovely 2nd story balcony. Their lots used to be #10 and #11. At this time the Mann family also owned #532 so they had 3 houses on the 500 block of S. 5th Ave. Eugene John had a farm on Ellsworth Road where he grew soy, corn, hay, and raised steers. His children are John, Robert, Julie, and Barb.

(6) John Bates Mann

He is the Mann whom I spoke with and who gave me this genealogy. He taught auto mechanics at Washtenaw Community College for many years and also helped his father on the farm. He built a beautiful Victorian house on 5 acres at 2700 N. Parker Rd in Dexter, Michigan. The grounds are scenic with a recirculating stream and pool. The great blue herons were eating all the fish and stabbing at chipmunks so they had to float a plastic alligator in the pond. The herons are no longer a problem. This property was inherited from his maternal side, the Bates, another old family in this area. John and his wife, June, have a daughter named **(7) Erin Garcia** who has recently lived in #532 S. 5th Ave (Garcia is her husband's last name). Her son by her first husband is named **(8) Maverick Bret Leshack**. Maverick is the 8th generation, counting from Jonathan Henry Mann and also lived at #532, an Italianate house built in 1860. This property still belongs to the Mann family. This is a unique story in which we see that one of the two original German families in Ann Arbor still maintains property on the 500 block of S. 5th Ave. This kind of historic continuity is why the 500 block is part of "Germantown." The property next door to #532 to the south is a Greek Revival (with a roof gable that was added later). It was also built in 1860 and was owned by a doctor.

From: Richard Jacobson [richardjacobson@comcast.net]
Sent: Monday, May 17, 2010 1:00 PM
To: Thacher, Jill
Subject: Photo of Eugene Mann's Drug store -- Forward to Historic Committee
Attachments: MANN DRUGGIST SHOP PIC.jpg

To Members of the 4th and 5th Avenue Historic Committee

care of Jill Thatcher:

I will be forwarding later this afternoon a large body of evidence I have compiled indicating that the uninterrupted line of historic homes on S. Fifth Avenue, south of Packard, should be included in the historic district. In the meantime, I thought I would forward this extraordinary photo of Eugene Mann in front of his drug store on S. Main. I obtained the photo from John Mann of Dexter. He also supplied me with a detailed family tree, which shows the exact association of the Mann family with the Schmid family. As the committee already knows, Eugene Mann built 538 S. Fifth Avenue, migrating from the Old West side.

This photo is intended to draw attention to what unites the uninterrupted line of historic homes, on 5th Avenue south of Packard, with those in the currently proposed district -- the extraordinary density of early business owners who lived there. I discovered that 69% (9 out of 13) of the houses on our block of 5th Ave., south of Packard, were occupied by proprietors of businesses on S. Main, Liberty, and State streets. Some conducted businesses out of their homes or garages or carriage houses. I also discovered that these owners lived in close proximity to many of their workers, sometimes even renting rooms to them. Business leaders served as alderman or on standing committees, alongside mayors who lived on 5th north of Packard, connecting our block politically to those north. Moreover, members of certain business families in the proposed district lived on our block, and vice versa, underscoring the shared social, as well as commercial and political, fabric.

One of the earliest professionals conducting business out of her home was Lucy Wilcox, a homeopathic physician. An 1868 directory indicates she lived on the west side of S. Fifth Avenue -- between Packard and Fifth. I will conduct further research to determine if she is Lucinda Wilcox, a homeopathic physician who made her mark in Detroit as a leader of the women's suffrage movement. As I will relate later today, data tends to connect her to our home at 538 S. Fifth Avenue, or its immediate vicinity.

Lucy's absence in the report is suggestive of another missing theme: the emergence of women in the workplace in the neighborhood. In scrutinizing directories, I was surprised at the number of women working as seamstresses, clerks, and stenographers. Some were university students.

I am submitting this material at this late date, because I only learned that the committee had studied our block, for possible inclusion in the historic district, just days

ago. I have discovered significant errors and omissions in the survey sheets for the homes on our block. In particular, I have found earlier references in directories, than those cited by the committee. Also missing were the connection of the homes to business owners.

The density of historic structures is greatest on our block of 5th, south of Packard, and on E. Jefferson. It appears the center of the district should be those two streets. Interruptions of two large parking lots on the west side of 5th Ave, north of Packard, and the later 20th century dates of some homes, argues against that area as the focus. One home demolished by the parking lots was that of mayor William G. Doty, who served two terms (1891-1893). Eugene Mann served as an alderman during his administration.

Even William Doty took in a boarder, as so many did in the neighborhood, regardless of the social standing of the owner. This proximity of business and political leaders to those who worked for them, in Germantown, argues against the social distinctions the committee erroneously advanced as a basis for the committee's southern boundary.

Marianne Zorza
538 S. Fifth Avenue
Ann Arbor, MI 48104
richardjacobson@comcast.net

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
CYNTHIA C. KOKKALES	<i>Cynthia C. Kokkales</i>	09/25 2009	544 S. 7 th Ave.	663-5987	NA
JOHN B. MANN	<i>John B. Mann</i>	05/05 2010	532 S. 5 th Ave	4264939	N/A


Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
Paul H. Domin		9-26-09	213 Buena Vista 220 Packard Rd.		



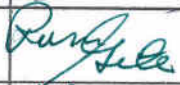
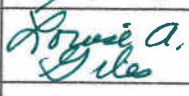
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545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
Beverly Strassmann		10/7/09	545 S. 5 th Ave	734 6681388	bistrassmann@gmail.com
Claudius Vincenz		10/7/09	545 S. 5 th Ave	734 6681388	vincenz@umich.edu
ROBERT GILES		3/6/10	541 S. Fourth Ave	248 302-2222	BOB@GILES@WOWWAY.CO
Louise A. Giles		3/6/10	541 S. Fourth Avenue	248- 224-3369	louise.giles@wowway.com.

Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

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Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
WALTERS	<i>Walters</i>	10/1	548 S. 5th		
SPILLER	<i>Spiller</i>	2009	Avenue		
			owner of 549, 551 S. 5th Ave		
			" " 303, 309, 311, E. Madison		


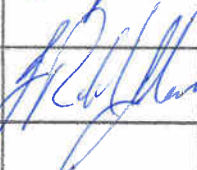
Please return this petition to:

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 545 S. 5th Ave. No 2
 Ann Arbor, MI 48104

Tel: 734 668 1388
 Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
F. RICHARD JACOBSON		2-25-10			
F. RICHARD JACOBSON		2-25-10	538 SOUTH FIFTH AVE	734 358 3416	

Please return this petition to:

Beverly I. Strassmann
 545 S. 5th Ave. No 2
 Ann Arbor, MI 48104

Tel: 734 668 1388
 Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
ZAKI ALAWI	<i>Z. Alawi</i>		200 PACKARD 510. S 4th Ave.	734 260 7215	Zakialawi58@yahoo.com
SAMAHER KARIM	<i>Samaher Karim</i>		314 E. WILLIAM	48104	

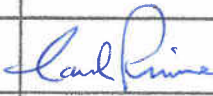

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PETITION

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Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
CARL RINNE		9-28-09	522 S. 4TH AVE.	717-1023	Carl.Rinne@gmail.com
TAMARA REAL (W)		9-28-09	522 S. 4TH AVE	—	—

Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
GRAHAM MILES	<i>Graham Miles</i>	9-24-09	526, 528 SO. FIFTH AVE	734-662-7121	GPMILES@YAHOO.COM
			517, 521, 523 & 525 SO. FOURTH AVE.		
Bonnie Miles	<i>Bonnie Miles</i>	9-24-09	SAME AS ABOVE	662-7121	---


Please return this petition to:

Beverly I. Strassmann
 545 S. 5th Ave. No 2
 Ann Arbor, MI 48104

Tel: 734 668 1388
 Email: bistrassmann@gmail.com

PETITION

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Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
ROHIT PATEL		9/28/09	524 S. 4th Ave Ann Arbor MI 48104	734 207 3520	

Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

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Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
Mustafa Ali	<i>Mustafa Ali</i>	9/28/09	537 & 430 S. Fourth Ave	734 891 4167	Info@CareOneRental.com
Areej Abdulhussein	<i>Areej Abdulhussein</i>	9/28/09	//	/	Areej34@yahoo.com

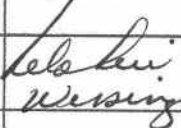
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Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)
LELAHNI WESSINGER		9/28/09	314 PACKARD		lelahniw@aol.com

Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

PETITION

We, the undersigned, support the Historic District for S. 5th Avenue and S. 4th Avenue and ask that it extend south of Packard Road to E. Madison Street, Ann Arbor, Michigan.

Printed Name	Signature	Date	Address of Property	Phone (optional)	Email (optional)

Please return this petition to:

Beverly I. Strassmann
545 S. 5th Ave. No 2
Ann Arbor, MI 48104

Tel: 734 668 1388
Email: bistrassmann@gmail.com

Oct 17, 09

Mrs Strassmann:

My husband and I own 2 houses near the proposed building project on Madison. We rent them out to students. I do have concerns about how this will effect us. Presently my son manages these houses as my husband is no longer able to work. I help with the bookkeeping end of the

business and mainly take care of my husband.

We own a house accross from you at 507 S. Fifth. If you have concerns about the property, please give me a call. at the moment the apartments are rented out to graduate students, who seem to be more responsible.

Sorry we can't be of much assistance in helping you. I would be in favor of this area becoming a Historic District.

Von Schnegelsberg
429-2089 (Saline)

vschnegel@aol.com

From: Richard Jacobson [richardjacobson@comcast.net]
Sent: Monday, May 17, 2010 5:58 PM
To: Thacher, Jill
Subject: M. Zorza's comments to 4th/5th historic committee

To Members of the 4th/5th Ave. Historic Committee:

I. Introduction and Overview

My husband has owned the property at 538 S. Fifth Avenue for almost 25 years. Our property, and the entire block of 5th Ave. south of Packard, was inappropriately excluded from the proposed district, in the preliminary report, due to the committee's inadequate research and flawed rationale in drawing the southern boundary of the proposed district. The following comments on the committee's preliminary report are based on my own research. I begin below with the report's specific errors and omissions regarding our particular property, and then provide evidence which challenges some of the report's statements of fact, conclusions, and historical analyses. My research, which is only conveyed here in part, strongly indicates that S. Fifth Avenue, between Packard and E. Madison, belongs within the boundaries of the historic district.

The committee's preliminary report is fundamentally flawed in excluding S. 5th Avenue, south of Packard, on the basis that it was a working class area associated with a mill. In fact, the committee never describes the mill or where its workers lived. Presumably, the committee is referring to a saw mill, located at State and Hill, which appears on a 1865 plat map. The mill seems rather remote from our block. I have not yet discovered any inhabitants on our block, when perusing numerous historical directories, who were described as mill workers.

My research indicates that the committee missed the major historic theme of the district – that this neighborhood was occupied by the movers and shakers of nearby downtown Ann Arbor. There is an extraordinary density of home owners on 5th, south of Packard, and in the committee's proposed district, who were the proprietors of businesses on Main, Liberty, S. Ashley, and State streets. In fact, even with limited time, I was able to confirm that 9 of the present 13 historic homes on our block housed business owners.

The data I collected demonstrate that business owners formed partnerships with nearby neighbors, lived with their employees, or in close proximity, and sometimes conducted businesses in their own homes. There is evidence of social mobility: tradesmen became business owners, business clerks who rented became homeowners. Businessmen rose to political position as aldermen, or filled standing committees. The taking in of boarders was itself a pervasive business in the neighborhood. Prominent businessmen and professionals engaged in the practice, as well as widows and new homeowners. The commercial and social trends I mention here unite our block with the currently proposed district.

Another theme missed by the committee was the increasing role of women in the workplace in Germantown. The earliest female professional in the neighborhood was Lucy Wilcox, a physician, who, according to the 1868 directory, lived on the south side of Fifth,

between Packard and E. Madison – an area inappropriately excluded by the committee. I did not have time to verify if this might be Lucinda S. Wilcox (1820-1884), who practiced as a homeopathic physician in Detroit, and wrote about women's suffrage and her own practice. I also need to complete research to try to determine which home on our block she might have inhabited. My research indicates that women who resided in the neighborhood entered the workforce in increasing numbers, with time, particularly as seamstresses, milliners, clerks, stenographers, and domestics. At least one seamstress conducted her business from her home on 5th Ave. Some early female inhabitants are described as students.

Our block also cannot be separated, on any reasonable basis, from the district the committee proposes, because members of the same families inhabited different parts of the Germantown neighborhood, including some scattered between the north and south sides of Packard – underscoring the common social fabric.

On the basis of my preliminary results, I propose that shared commercial and social networks, between our block and those to the north, indicate that the current southern boundary cannot be justified. In fact, if anything, it appears that our block, and E. Jefferson have the greatest density of intact historic structures, and should be the focus of the district from which other houses may be included. The west side of 5th Ave, north of Packard, in particular, is interrupted for a major share of its expanse by two huge parking lots. One missing home, now occupied by a parking lot, is that of William G. Doty, a mayor of Ann Arbor between 1891-1893. Eugene Mann was an alderman during his term.

My research time was limited by lack of notice, so this is by no means a comprehensive analysis. I only have time to quickly relate a small portion of my data below. I intend to conduct further research into the facts and patterns I explore here, and present a full analysis with appended documentation. Until just over a week ago, I had no notice that the committee was undertaking a survey of houses south of Packard, on 4th and 5th Avenues, for possible inclusion in the historic district.

As I quickly studied old directories last week, I conveyed to Beverly Strassmann results and historical patterns I deduced about our block of 5th Ave, south of Packard, and about the greater Germantown neighborhood. In an email to the committee, in the interest of time, she conveyed some of the preliminary results and patterns I discovered, without providing the supporting data I compiled. The limited data below, which is all I can relate in the limited time frame, fills only some of the gap. Unfortunately, there were two errors of fact in Beverly's letter: William G. Doty, a mayor, did **not** reside at 538 S. Fifth Avenue, and he was **not** an alderman. The first was an early error of mine; the second was Beverly's.

I. The Committee Made Significant Errors in Compiling Historical Information About our Property at 538 S. Fifth Avenue.

I am still undertaking research to more exactly date our property. The city assessor's office lists its building date as 1860. I do not know if that is an approximation. The Greek revival style and low ceilings suggest at least a date in the 1860's. As the committee notes,

an early plat map, 1854, show structures on the west side of 5th Ave., between Packard and Madison. However, these do not appear in the 1864 plat map. I feel my house is recognizable, in the 1880 bird's eye, as the second house from the corner house on Packard and S. Fifth., on the west side, although with a more simple front, without a porch. Our house has two internal chimneys, which appear in the drawing. The first house from the corner house, on the west side, bears a striking resemblance to 532 S. Fifth Ave. John Mann of Dexter has indicated that the Mann family documentation dates that home to the 1860's, as well. Hence, there may be two important founder's homes on our block. 549 S. Fifth Ave may be a third.

The 1868 directory lists several inhabitants on Fifth, south of Packard:

Christian Allmendinger, cabinet maker WF Muehling, res south end of Fifth
Miss Julia Brode, res sw corner Fifth and Packard
Miss Mary Lockland, res s e corner Fifth and Packard
Daniel Meyer, carpenter, res w s Fifth, bet Packard and S Madison
John M Reinhardt, boot and shoemaker 42 S. Main, res s e corner Fifth and Packard.
Mrs. Lucy Wilcox, s s Fifth bet Packard and Madison

As noted above, Lucy Wilcox is listed as a physician in the 1868 directory. It appears she did not live in a corner house, since corner dwellings were noted in the directory. Instead, she appears to dwell in one of the early houses inside the block of 5th, south of Packard. My husband claims to have seen documentation, when he purchased our property at 538 S. Fifth Ave, indicating that a physician built our home in the 1860's. We are undertaking a search for the documentation. I do not know if Lucy Wilcox is in any way connected to our home, but she is certainly connected to one of the early, internal dwellings on our block.

The committee states that Arthur E. Hawkes, a clerk at Stimson and Son, was the first directory listing found for our address, in the 1895 directory. This is an error in two regards. The first reference I could discover to 58 S. 5th, which is the address the committee identifies in the 1895 directory for our home, is in the 1886 directory. It is for Amelia Hauser, widow to Gottlieb Hauser. Residing at the address, as well, was a boarder, Arthur Roth, an apprentice at William Arnold.

I do not know if Gottlieb Hauser was the proprietor of G.F. Hauser's City Brewery, listed in the 1860 directory, at S. First Street. Interestingly, though, is the fact that, by 1868, that brewery became John Reyer's City Brewery. When Amelia died, the administrator of her will was her boarder, Arthur Roth, by a Dec. 1991 court order. The title abstract for the Rayer house at 526 S. Fifth Ave, indicates that Arthur Roth, acting as Amalie Hauser's executor, transferred the deed to the land for 526 S. Fifth Ave. in 1892 to Christian Rayer. The closeness of "Reyer" to "Rayer" and Amelia (Amalie) Haurser's possible connection to the G.F. Hauser Brewery, subsequently transferred to a Reyer, deserve further examination.

I also discovered that, in 1892, George G. Stimson, a proprietor of J. D. Stimson & Son, a grocery store on State Street, resided at our home. Arthur Hawkes, at clerk at the grocery store, also resided there, with his boss. Hence, our house, like so many on our block, was associated with a local business owner.

III. Owners of Businesses are Associated with Other Homes South of Packard on 5th Avenue.

Below is a list of just some of the businesses I discovered in association with other homes on our block of S. Fifth Avenue:

- 528 S. Fifth Ave – Eugene Mann, Mann Druggist, S. Main
- 532 S. Fifth Ave – Fredrick Blake, dental office on Main.
- 535 S. Fifth Ave – proprietor Capital Market
- 538 S. Fifth Ave – George Stimson, J.D. Stimson & Son, grocery, S. State
- 539 S. Fifth Ave – Frank H McFall, second-hand goods at 3 N 4th.
- 544 S. Fifth Ave – George Walker, Walker & Co, carriage works on w. Liberty and S. Ashley
- 545 S. Fifth Ave -- Michael Gauss, shoemaker with a shop on E. Liberty
- 548 S. Fifth Ave – Fiegel Family, Fiegel's Department Store, Main
- 558 S. Fifth Ave – Henry Otto, Henry Otto & Sons, blacksmith shop, S. Ashley

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5122
(20100517) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

From: Richard Jacobson [richardjacobson@comcast.net]
Sent: Monday, May 17, 2010 1:14 PM
To: Thacher, Jill
Subject: Correction to M. Zorza's earlier email to Historic Committee

To Members of the Historic Committee:

(in care of Jill Thatcher)

I just noticed a typing error in my email to you a few moments ago. Eugene Mann, of course, built **528 S. Fifth Ave.**, not 538 S. Fifth Ave. Sorry for the mistake, but I've had so little time to address issues of importance to me, that I wanted to send something out fast early this afternoon.

Marianne Zorza
richardjacobson@comcast.net

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5122
(20100517) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

From: Richard Jacobson [richardjacobson@comcast.net]
Sent: Wednesday, May 19, 2010 2:49 PM
To: Thacher, Jill
Subject: Additional info and Correction Regarding M. Zorza's Comments on Preliminary Report

To Members of the 4th/5th Ave Historic Committee:

I wanted to correct some errors in my email communication to you dated May 17, 2010, which arose over confusion regarding the changes in house numbers from two to three digits on Fifth Ave., and due to the fact that Arthur E. Hawkes lived at both 538 and 526 S. Fifth Ave. It appears that our house at 538 S. Fifth Ave. was numbered prior to 1895, for some years, as 60. The house at 526 S. Fifth Ave. was numbered 58.

With these numbers now properly assigned, the first owner appearing in city directories, for what is now 526 S. Fifth Ave., is Amelia (or Amelie) Hauser (widow of Gottlieb). When she died, the property was transferred to Christian Rayer. I have the records of the deed transfer, which I obtained from John Mann of Dexter.

For at least a year before the Rayer's moved in, George G. Stimson, proprietor of a grocery store on State St., lived there, along with his clerk Arthur E. Hawkes. Mr. Hawkes shows up in the directories as occupying our house at 538 S. Fifth Ave. for a short time with John Reinhart.

The proper assignment of numbers also made it possible for me to deduce that Christian Allmendinger resided at our home at 538 S. Fifth Avenue as early as 1868. He remained there for many years.

Marianne Zorza

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5129
(20100519) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

Introduction

I am very disappointed in the level of detail that the *Fourth and Fifth Avenue Historic District Study Report* contained. Considering this issue is so highly politically charged I would expect the report to have addressed more detail about the historical integrity in relation to the significance of the district. In particular, I was hoping for more detail in regards to the standard used for determining whether a house was contributing to the district or not and what logic/reasoning went into the decision that a specific house was contributing.

I would like to make clear at this point that I am not saying the recommendation that the study committee made is incorrect. I do, however, believe that more logic, fact based reasoning and data needs to be included in the report so that the community and city council understands what criteria were used for evaluating the district. The study committee's report relays the conclusion (recommendation for historic district), but provides little evidence or data to support the conclusion and in essence says, "trust us" on how we determined it.

Currently the report has much detail in regards to the history of who lived there but it's insufficient in the following areas:

- The report does not go into detail regarding the significant events claimed in the report.
- The report does not go into detail regarding the significant persons claimed in the report.
- When it comes to the criteria used for the evaluation of the historic integrity it is sorely lacking in detail, yet the study committee concludes that 100% of the properties are contributing. What standard was used? Was the standard established by the by the U.S. Secretary of the Interior used in evaluating the properties? No standard was described.

If, however, a different standard was used, such as establishing that a house is contributing based upon its creation date (i.e. age) rather than evaluating the historic integrity or historic fabric of the house, then this non-conforming standard should be defined in the text of the report. Also, any data that would have been collected under the conforming standard of the NPS should also be included so that the city council and/or community has the option of evaluating the properties using the recommended standards set forth by the NPS.

- Most of the data collected to evaluate criteria were omitted from the report. I am assuming that each house was evaluated using the criteria suggested by the Michigan Historical Center State Historic Preservation Office and established by the U.S. Secretary of the Interior.

I am requesting that the data and evidence used by the committee to support the claims within the study report be inserted into the report.

The criteria that the study committee are required to use are referenced in the following:

According to Chapter 103 8:408.3 of the Ann Arbor city code (see appendix I):

*the study committee shall be guided by the selection criteria for evaluation issued by the United States secretary of the interior for inclusion of resources in the national register of historic places, as set forth in **36 CFR part 60**, as amended, **and criteria established or approved by the SHPO***

The Michigan State Historic Preservation Office says (see Appendix III):

*The criteria that a historic district study committee must apply when determining the historic significance of historic resources and the boundaries of historic districts are the criteria and considerations developed by the **U.S. Secretary of the Interior for the creation of historic districts, as set forth in National Register Bulletin 15: How to Apply the National Register Criteria***

Secretary of the Interior, National Register Bulletin 15: How to Apply the National Register Criteria states (see Appendix IV):

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- *Being associated with an important historic context **AND***
- *Retaining historic integrity of those features necessary to convey its significance.*

The steps in assessing integrity are:

- **Define the essential physical features that must be present** for a property to represent its significance.
- Determine whether the essential physical features are **visible** enough to convey their significance.
- Determine whether the property needs to be compared with similar properties. *And,*
- Determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.

Criteria for Evaluation

According to NATIONAL REGISTER OF HISTORIC PLACES TITLE 36 CFR 60 Sec 60.4 Criteria for evaluation (see Appendix II), an eligible property in the district must possess integrity and possess one of the following criteria to be significant, but none of these criteria are explained in the report:

(1) Criterion A: *that are associated with events that have made a significant contribution to the broad patterns of our history*

The report does not appear to identify any “events.” The report speaks to the immigration of the Germans into this area, yet specifically says that most of the German immigrants actually chose to live not in the proposed district, but instead in the Old West side. If the German immigration was significant to the City of Ann Arbor history, there is no language in this section that says “why” this immigration is important versus any other immigrant group in Ann Arbor. What makes this group stand out? Why is the German immigration important for any reason? The report only makes assertions of fact with no references or evidence to back up the claim that this immigration event is significant to the City of Ann Arbor history.

According to the **Secretary of the Interior** , National Register Bulletin section VI (see Appendix IV)

The property you are evaluating **must be documented**, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events. **A property is not eligible if its associations are speculative.**

If the immigration “event” was documented then this information needs to be inserted into the report.

(2) Criterion B: *that are associated with the lives of persons significant in our past.*

The people included in this section have their titles (i.e. Mayor) mentioned but the report does not explain what these people accomplished or their impact

upon the history of the city. An accomplishment – not a title – makes a person significant.

According to the National Park service Bulletin 15 section VI (see Appendix IV)

The persons associated with the property must be individually significant within a historic context. **A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.**

Eligible

The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgment can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

Language and references specific to the accomplishments of these Ann Arbor citizens needs to be inserted into the report to show that this claim is valid.

- (3) **Criterion C: that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction**

This section should presumably include the standard and reasoning used for the evaluation of the properties. The survey sheets should contain the data collected along with the analysis pertaining to the specific property.

According to the **Secretary of the Interior** , National Register Bulletin sect. VIII (see Appendix IV)

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that

constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. **The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.**

In other words if there is little original historic fabric remaining on the house, the house is not eligible for consideration. The data need to be collected for an accurate report to be filed.

Although there is a section dedicated to architectural styles within the district in the History section early in the report, that section merely summarized the architectural styles and why such styles are important. But Criterion C is supposed to establish how the design and construction of each property is significant. The report should therefore include detail along with the explanation of the standard used for contributing vs. non-contributing decision-making.

Criterion C in the study report lists two buildings that were architecturally designed.

According to the Secretary of the Interior , National Register Bulletin section VI (see Appendix IV)

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.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

Language needs to be included explaining why this particular house is important to the architect's career or the house needs to be included in other sections of Criterion C.

Determining contributing vs. non-contributing

The study committee prepared a survey sheet for each house which listed the style of the house and the materials of the foundation, walls and roof, but there is no language to what that means. Specifically, the report does not explain whether

these materials are original or important and should therefore be preserved. In fact many of the houses appear to have vinyl or aluminum siding and non-original windows (by looking at the pictures). Because the report should make the case that these particular houses are contributing architecturally, there should be some language dedicated to these issues. The report's descriptive notes section essentially reads like a realtor description with a few added notes about some of the architecture.

Above, I referenced the Secretary of the Interior's National Register bulletin 15 (see appendix IV) which provides that the steps in assessing integrity include defining the essential **features that must be present**, determining if they are **visible** and determining if these aspects are **vital to the property**. Considering that the study committee determined that 100% of the houses are contributing, the study committee should describe what went into their decision-making regarding whether something is contributing or non-contributing. The standard used along with the logic and reasoning needs to be spelled out. Should the house have 75% of the original materials or 50%? If the house had vinyl siding (non-original) and non-original windows, should it still be considered a contributing resource because of some other important element? Currently, neither the report nor the survey cards include any of these details.

The descriptive notes section of the survey cards should include a more detailed description of the historic fabric of the house, what materials are original, what has been replaced, when were the additions to the houses constructed, etc. Many of these houses have multiple additions added on to them, yet there is no mention of the historical significance of the later additions. When were the additions built? Are they historic in their own right?

Visibility

Special attention should be paid to physical features that are covered up with modern materials with more emphasis place on whether there is enough historical fabric that is visible. The NPS states (see Appendix IV).

*Properties eligible must not only retain their essential physical features, but the features must be **visible** enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.*

If the historic exterior building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured.

Language needs to be included that justifies a determination of “contributing” for all houses that have major physical features that are covered up.

Special attention should be paid to the additions that are added to the front of the original house. According to the NPS (see Appendix IV):

If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

If the addition that is added on to front of the house is modern (within 50 years) does that qualify as a false front? There are at least a couple of properties that have additions on to the front of the original house as stated on their survey sheets.

Properties owned by Religious institutions

The National Register of Historic Places (see Appendix II) clearly provides that:

properties owned by religious institutions or used for religious purposes.....shall not be considered eligible. However, such properties will qualify if they are integral parts of districts that do meet the criteria of if they fall within the following categories:

(a) A religious property deriving primary significance from architectural or artistic distinction or historical importance

Because the criteria clearly stipulate that religious institutions are ineligible, the report needs much more definitive language regarding why the church at 423 S. Fourth and the house at 437 S. Fourth, which is owned by the church, are considered eligible and are contributing resources to the district

Broadway Historic District Committee

I realize that the format for this study report is a template that was also used for the Broadway Historic District Study Committee. However, the Broadway study committee was different in an important way. Their report had 25% of the houses being non-contributing and they listed a reason for their disqualification as a contributing historic resource for the district for many of the houses (i.e. extensive remodeling) in the report. Although one did not know what standard was used to determine a contributing resource to the district, one knew that “a standard” was

used. When the Fourth and Fifth Avenue District Committee classifies everything as contributing, a reader of the report naturally wonders which standard was used or if any standard at all was used. This question can be easily clarified by including more detail on the survey sheets about the historic fabric and integrity of the house.

I was not able to look at the survey sheets for the Broadway Historic district because the link was broken on the city of Ann Arbor website.

Conclusion

A newly established Historic District in the area of Fourth and Fifth Avenue will have an impact on the entire community. I – and the entire community – expect the study committee to be fully transparent in their standards and criteria used when evaluating the proposed district.

Specifically the report needs to modify the following:

- Criterion A: Documentation and/or references need to be included to justify the significance of the German immigration as an “event” or to justify any other implied event that has made a significant contribution to the history of the city.
- Criterion B: Documentation and/or references need to be included to justify the accomplishments of the significant individuals named in this section. An accomplishment – not a title – makes a person significant.
- Criterion C: The study committee needs to explain the criteria used to determine if a property is contributing or non-contributing to the proposed historic district
- Criterion C: The survey cards need more detail related to what features are still present, which features are visible along with a more detail description of the history of the additions to the houses.
- Criterion C: More detail is needed explaining how the two buildings that were architecturally designed are unique in the architects career

I therefore request that the report be modified to include the missing information so that the community, the Historic District Commission, the Planning Commission and the City Council all have the relevant information available to them when making their recommendations for approval.

Appendix

I. Chapter 103 8:408.3 of the Ann Arbor City Code

The study committee shall do all of the following:

- a) Conduct a photographic inventory of resources within any proposed historic district following procedures established or approved by the SHPO.
- b) Conduct basic research of each proposed historic district and the historic resources located within that district.
- c) Determine the total number of historic and non-historic resources within a proposed historic district and the percentage of historic resources of that total. In evaluating the significance of historic resources, **the study committee shall be guided by the selection criteria for evaluation issued by the United States secretary of the interior for inclusion of resources in the national register of historic places, as set forth in 36 CFR part 60, as amended, and criteria established or approved by the SHPO**, if any.
- d) Prepare a preliminary historic district study committee report that addresses at a minimum all of the following:
 - I. The charge of the study committee.
 - II. The composition of the study committee membership.
 - III. The historic district or districts studied.
 - IV. The boundaries for each proposed historic district in writing and on maps.
 - V. The history of each proposed historic district.
 - VI. The significance of each district as a whole, as well as as sufficient number of its individual resources to fully represent the variety of resources found within the district, relative to the evaluation criteria.
- e) Transmit copies of the preliminary report for review and recommendations to the historic district commission, the planning commission, the SHPO, the Michigan Historical Commission, and the State Historic Preservation Review Board.
- f) Make copies of the preliminary report available to the public as required by section 8:408(7).

http://www.a2gov.org/government/communityservices/planninganddevelopment/historicpreservation/Documents/FINAL_ADOPTED_%20Chapter_103_09-28-07.pdf

**II. NATIONAL REGISTER OF HISTORIC PLACES
TITLE 36 CFR 60**

Sec 60.4 Criteria for evaluation

- a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b) that are associated with the lives of persons significant in our past; or
- c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) that have yielded, or may be likely to yield, information important in prehistory or history.

Criteria considerations.

Ordinarily cemeteries, birthplaces, or graves of historical figures, **properties owned by religious institutions or used for religious purposes**, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years **shall not be considered eligible** for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria of if they fall within the following categories:

- (a) **A religious property deriving primary significance from architectural or artistic distinction or historical importance**

<http://www.nps.gov/nr/regulations.htm>

**III. Michigan Department of History, Arts and Libraries Michigan
Historical Center State Historic Preservation Office (SHPO)**

Criteria for Evaluating Resources for Inclusion in Local Historic Districts

Page 2 Criteria for Historic District Boundary Determinations

The criteria that a historic district study committee must apply when determining the historic significance of historic resources and the boundaries of historic districts are the criteria and considerations developed by the U.S. Secretary of the Interior for the creation of historic districts, as set forth in ***National Register Bulletin 15: How to Apply the National Register Criteria***

http://www.michigan.gov/mshda/0,1607,7-141-54317_21884-59512--,00.html

**IV. U.S. Department of the Interior, National Park Service
National Register Bulletin 15: How to Apply the National Register Criteria
(excerpts, please see webpage for complete section)**

Section III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- Being associated with an important historic context **and**
- Retaining historic integrity of those features necessary to convey its significance.

Section VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

Historic properties either retain integrity (this is, convey their significance) or they do not.

SEVEN ASPECTS OF INTEGRITY

Location
Design
Setting
Materials
Workmanship
Feeling
Association

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- **Define the essential physical features that must be present** for a property to represent its significance.
- Determine whether the essential physical features are **visible** enough to convey their significance.
- Determine whether the property needs to be compared with similar properties. And,
- Determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both why a property is significant (Applicable Criteria and Areas of Significance) and when it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

Criteria A and B

A property that is significant for its historic association is eligible if it **retains the essential physical features that made up its character or appearance during the period** of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

Criterion C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

Historic Districts

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible

if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance or
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.

Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

Non-Historic Exteriors

If the historic exterior building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

<http://www.nps.gov/history/nr/publications/bulletins/nrb15/>

Section VI: HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

Criterion A: Event

Criterion B: Person

Criterion C: Design/Construction

Criterion D: Information Potential

**For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

- **Associative value (Criteria A and B):** Properties significant for their association or linkage to events (Criteria A) or persons (Criteria B) important in the past.
- **Design or Construction value (Criterion C):** Properties significant as representatives of the manmade expression of culture or technology.
- **Information value (Criterion D):** Properties significant for their ability to yield important information about prehistory or history.

CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

Understanding Criterion A: Event

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, **the property must have an important association with the event or historic trends, and it must retain historic integrity.** (See Part V: How to Evaluate a Property Within its Historic Context.)

Several steps are involved in determining whether a property is significant for its associative values:

Determine the nature and origin of the property,
 Identify the historic context with which it is associated, and
 Evaluate the property's history to determine whether it is associated with the historic context in any important way.

Applying Criterion A: Event

A property can be associated with either (or both) of two types of events:

A specific event marking an important moment in American prehistory or history and

A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

The property you are evaluating **must be documented**, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events. **A property is not eligible if its associations are speculative.** For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

Significance of the Association

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

(For further information on properties eligible under Criterion B, refer to National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons.)

Understanding Criterion B: Person

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. **The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements.** (The policy regarding commemorative properties, birthplaces, and graves is explained further in Part VII: How to Apply the Criteria Considerations.)

The persons associated with the property must be individually significant within a historic context. **A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.**

Eligible

The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Understanding 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.

The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources "that represent a significant and distinguishable entity whose components may lack individual distinction" are called "districts." **In the Criteria for Evaluation (as published in the Code of Federal Regulations and reprinted in Part II)**, districts are defined within the context of Criterion C. Districts, however, can be considered for eligibility under all the Criteria, individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in Part IV: How to Define Categories of Historic Properties. Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.

Applying Criterion C:

Distinctive Characteristics of Type, Period, and Method of Construction

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be

eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.
-

Distinctive Characteristics: "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.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Type, Period, and Method of Construction:

"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.**

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.**

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.