

# City of Detroit

## CITY COUNCIL

### HISTORIC DESIGNATION ADVISORY BOARD

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December 7, 2021

Mr. Robb McKay  
Historic Architect  
State Historic Preservation Office  
300 North Washington Square  
Lansing MI 48913

RE: Draft Rules Comments

Dear Mr. McKay,

Thank you for the opportunity to review the proposed rulemaking for the State Historic Tax Credit program. On behalf of the Detroit City Council Historic Designation Advisory Board, please accept these comments for consideration:

- Revise the proposed fee structure for owner-occupied residential properties pending public comments from large municipalities such as Detroit, Flint, Pontiac, Saginaw, etc. Recommend reducing to \$50 per application, regardless of anticipated qualified expenses.
- Recommend inserting specific language that bars individual property owners from receiving simultaneous tax credits for multiple projects at different locations.
- Recommend specifying the photograph quality that will be accepted as part of the application(s) rather than current "deemed sufficient" language.
- Will applications be able to be submitted directly via the SHPO website? Otherwise, recommend specifying how applications will be submitted (i.e. whether or not it will be permissible to submit electronically or only by mail).
- Recommend shortening the Part 1 Application (certification of historic significance) timeline for review to 60 days of receipt of complete application. The current 120 days (i.e. 4 months) might have the unintended consequence of delaying successful applications beyond the calendar year.
- Please specify the deadline to issue the certification letter after a complete Part 2 Application is submitted to the SHPO. Recommend 60 days.

If you require any additional information, you can reach out to Janese Chapman, Director of HDAB, directly at [chapmanj@detroitmi.gov](mailto:chapmanj@detroitmi.gov).

Sincerely,



Dr. Carolyn Carter  
Chair, Historic Designation Advisory Board