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**TO:** Detroit City Council

**FROM:** David Whitaker, Director  
Legislative Policy Division

**Date:** January 21, 2025

**RE:** Renaissance Center Historic Designation Eligibility

The Legislative policy Division (LPD) has been requested by Council Member Angela Whitfield Calloway to provide a report regarding whether the Renaissance Center is eligible for historic designation.

LPD notes that the designation of historic districts in the city of Detroit is governed by the Detroit City Code, Chapter 21, *History*, Article II, *Historic Districts and Landmarks*, Division 2, *Historic Designation Advisory Board*, Section 21-2-31 *Establishment of historic districts*. The procedure to determine eligibility and establishment of a historic district in accordance with the City Code is as follows:

Section 21-2-31

- (a) Upon the receipt of a request to City Council from any person residing, doing business, or owning property in the City to designate an area, a resource, or resources as an historic district, the City Council, after making a determination that there are reasonable grounds for such a request, may adopt a resolution directing that the Historic Designation Advisory Board make a study to determine whether the proposed district meets the criteria for designation under the provisions of this article.

Pursuant to subsection (a), upon request, the City Council after making a determination that reasonable grounds exist, may adopt a resolution directing the Historic Designation Advisory Board to make a study to determine whether a proposed Renaissance Center District meets the criteria for a designation.

The Historic Designation Advisory Board shall conduct the study as set forth under Subsection (d) which provides in pertinent part:

The Historic Designation Advisory Board shall survey and research the proposed historic district and prepare and transmit a preliminary report to the City Council, the Historic District Commission, the Planning and Development Department and the City Planning Commission. The survey, research, and report shall satisfy the requirements of the Michigan Local Historic Districts Act, being MCL 399.201 *et seq*<sup>1</sup>.

Additionally, in establishing the eligibility of the Renaissance Center as a proposed historic district, subsection (f) provides in pertinent part:

In evaluating the significance of resources to be included in the historic district, the Historic Designation Advisory Board and the City Council shall be guided by the criteria for inclusion in the National Register of Historic Places, as published at 36 CFR Part 60, and criteria established or approved by the Michigan State Housing Development Authority, if any.

As set forth in the Michigan Local Historic Districts Act, and the City Code, criteria for a historic designation shall include the requirements set forth in the Code of Federal Regulations Section 36 CFR 60.4 *Criteria for evaluation*, which provides:

National Register criteria for evaluation. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

(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

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<sup>1</sup> Pursuant to MCL 399.203(1)(c) Determine the total number of historic and nonhistoric resources within a proposed historic district and the percentage of historic resources of that total. In evaluating the significance of historic resources, the 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 C.F.R. part 60, and criteria established or approved by the department, if any. As well as 399.203(1)(d) Prepare a preliminary historic district study committee report that addresses at a minimum all of the following:

- (i) The charge of the committee.
- (ii) The composition of the 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 a sufficient number of its individual resources to fully represent the variety of resources found within the district, relative to the evaluation criteria.

- (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.
- (g) A property achieving significance within the past 50 years if it is of exceptional importance.

If the Renaissance Center meets the criteria for historic designation as set forth under the City Code and Michigan Local Historic Districts Act as determined by a study conducted by the Historic Designation Advisory Board, then it will be eligible for such designation.

Please let us know if we can be of further assistance.