



January 31, 2023

Michael Schroeder, Project Manager  
Applied Environmental  
2990 W. Grand Blvd, M-18  
Detroit, MI 48202

RE: Section 106 letter report, remediation and remodeling, former WWJ transmitter, 12700 W. 8 Mile Road, Oak Park, Oakland County

Dear Mr. Schroeder,

Thank you for contacting me to prepare this report assessing the historic properties and the effect of the above project. My education and experience meet the qualifications required in 36 CFR 61 for an architectural historian. On January 9, 2023, I visited the project site to evaluate the project site and surrounding area. This written report will (1) define the area of potential effects (APE); (2) identify Historic Properties within the APE; (3) evaluate the historic significance of identified properties as appropriate; and (4) assess the effects of conducting remediation and renovating a former radio transmitter building, including adding a new building, parking lots, and driveways, to the site on any historic properties within the APE.

## **DESCRIPTION OF THE PROJECT**

The proposed project is comprised of remediating environmental hazards in the basement of the existing building as well as removing an area of contaminated soil to 2' deep in the lawn area west of the existing building. Once remediation is complete it is proposed to pursue one of two options. 1) Construct a new one-story tall 34' by 284' building and a 20-space parking lot in the northwest portion of the site, including new driveways to 8 Mile Road and to Meyers Road to the east, and then in the future renovate and construct an addition to the existing building and construct a 120-space parking lot on the east portion of the property. 2) Construct a new one-story tall 72' by 144' building and a 20-space parking lot on the west edge of the site, including new driveways to 8 Mile Road and to Meyers Road to the east, and then in the future renovate and construct an addition to the existing building and construct a 120-space parking lot on the east portion of the property. No elevations or details of the new building are available.

The remediation in the building will take place in the basement. Non-loading bearing masonry walls will be removed. The remaining concrete floor and brick walls will have the surfaces containing the contaminants removed, and the masonry will then be sealed with an epoxy coating. New wall or floor surfaces may be applied over the coating.

The future addition and building renovations include removing the rear loading dock area and demolishing the north wall of the building in order to construct a one-story tall addition behind the center of the building and the west wing. Patios are proposed to the west side and rear of the new addition. A barrier free ramp is proposed behind the east wing. The new addition behind the center of the building will be clad in metal panels, while the portion of the addition behind the west wing will have glass "nana" walls that can be opened. The finishes for the interior of the building are unknown.



**Photo 1 Looking northeast at WWJ building proposed for remediation and renovation, January 2023**



**Photo 2 Looking southeast at rear of building at location of proposed addition, January 2023**



**Photo 3 Detail of loading dock area and north wall proposed for demolition, January 2023**



**Photo 4 Looking south at area for proposed barrier free ramp and north wall where addition is proposed, January 2023**



**Photo 5 Looking east across front of property toward proposed parking lot location, January 2023**



**Photo 6 Looking north at west edge of property, Google Earth, August 2022**



**Photo 7 Looking south in basement where remediation is proposed, January 2023**



**Photo 8 Looking east in main lobby, January 2023**

### **INDIRECT AREA OF POTENTIAL EFFECT (APE)**

The APE for indirect effects includes the 4.59-acre property at 12700 West 8 Mile Road in Oak Park. Due to the large size of the parcel, there is limited potential to affect any properties beyond the property itself. The proposed new building, driveways, addition and parking lots are the only proposed exterior changes and they do not have the potential to affect the setting, views, or feeling of properties outside of the parcel. This area of 8 Mile Road has a mix of post-war industrial properties and newer commercial properties. The indirect APE is shown on the attached street map and aerial map which also contains a photo key for this report.

## HISTORIC PROPERTIES WITHIN THE APE

The SHPO records for the indirect APE were requested, the *National Register of Historic Places*, and *Michigan State Register of Historic Sites* were all reviewed. There is one above-ground historic property within the area of potential effect. The project takes place at the former WWJ transmitter building which is eligible for listing in the National Register of Historic Places.

According to a report prepared by Ron Campbell, Oakland County Historic Preservation Technical Assistance, the WWJ transmitter building was constructed in 1936 and was designed by Detroit architect Clarence Day. Designed in the Art Deco style, the building was constructed for radio station WWJ, which began broadcasting on August 20, 1920, and was created by the Detroit News. It became a full-time radio station in 1927 and was the fourth radio station to be licensed in the United States. The transmitter building was constructed to house the most up-to-date broadcasting equipment at the time and had an emergency power supply. The building was used by the station until 1995.



**Photo 9 Looking southwest across 8 Mile from project location, January 2023**



**Photo 10 Looking southeast across 8 Mile from project location, January 2023**

## ASSESSMENT OF EFFECTS

The proposed remediation and renovations of the former WWJ transmitter building will have No Adverse Effect on the WWJ transmitter building which is eligible for listing in the National Register of Historic Places. The proposed remediation, renovation and additions will not destroy any character defining features of the property and will meet *The Secretary of the Interior's Standards for Rehabilitation*. The proposed new building at either the north or west edge of the parcel, related parking and driveways, as well as the proposed parking lot on the east portion of the property will not change the setting of the property. The proposed building is far enough away from the historic building to not change the setting or views of the historic building.

The criteria for Adverse Effect are not met as the proposed remediation and renovations meet *The Secretary of the Interior's Standards for Rehabilitation*. Therefore, it is my opinion that the remediation and renovation project as proposed, including either option for new construction, will have No Adverse Effect on the WWJ transmitter building which is eligible for listing in the National Register of Historic Places.

If you have any questions or require additional information, please contact me at 313-300-9376 or at [kristine@kidorfpreservationconsulting.com](mailto:kristine@kidorfpreservationconsulting.com).

Sincerely,



Kristine M. Kidorf  
Kidorf Preservation Consulting

Attachments



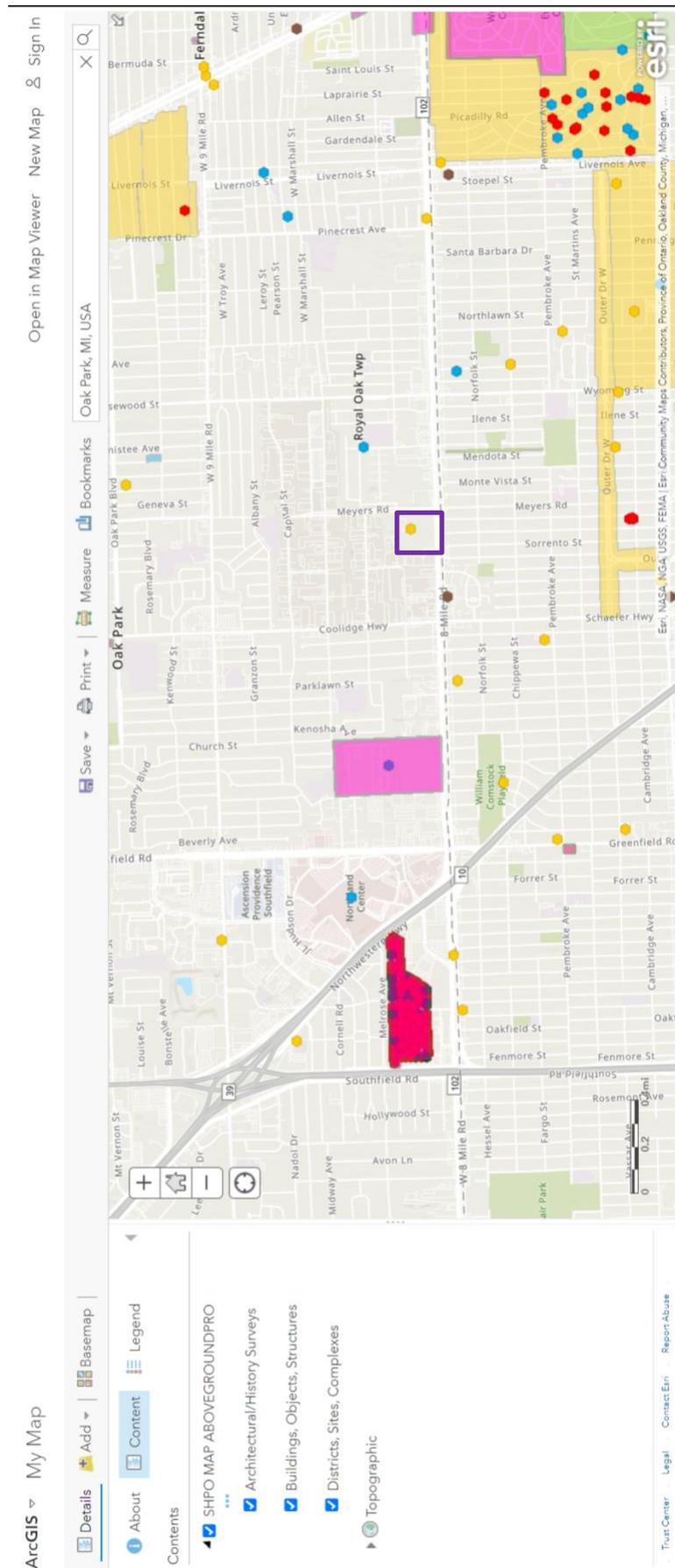
**ATTACHMENT B –AERIAL MAP WITH REPORT PHOTO KEY**



Oak Park, Oakland County  
 — = 100 feet  
 □ Project location and indirect APE



# INDIRECT APE ON SHPO PROVIDED ARCHITECTURAL PROPERTIES MAP (purple box)





## **Arbre Croche Cultural Resources LLC**

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**Misty M. Jackson, Ph.D., Proprietor and Principal Investigator**

*ACCR is certified as an Economically Disadvantage Woman-owned Small Business*

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February 8, 2023

Jason Vertrees

President

Curtis Chapman

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Michael Schroeder

Project Manager

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Corporate Office

1210 N. Maple Road

Ann Arbor, MI 48103

### **Archaeological Records Review and Recommendation for the Section 106 Review Application for the Proposed WWJ Transmitter Building Remediation, 12700 8 Mile Road, Oak Park, (Historically Royal Oak Township) Oakland County, Michigan**

#### **Project Location and Description**

The project proposes remediation of the WWJ Transmitter Building and property located at 12700 8 Mile Road, Oak Park, Oakland County, Michigan. The federally funded portion of the project involves the remediation of PCBs in the basement of the building and remediation of contamination of a section of the property west of the building. Work is in preparation to renovate the existing building and property including constructing an addition, parking lot, and new drives to access the building. A new building with functions/businesses listed as Commissary Kitchen, Mom's Spaghetti, Cowless Ice Cream, and Tin Canning is also proposed. Four development plans for the grounds exterior to the transmitter building are currently under consideration.

The overall property comprises 4.59 acres and is approximately 799.97 ft east-west and 250 ft north-south. Locations proposed for ground disturbance include removal of PCB-impacted soils in an area estimated to measure no more than 100 ft by 100 ft to a depth of 2 feet below grade and replacement with new topsoil. Given that four development plans are currently under consideration, the entire property must be treated as potentially undergoing ground disturbance. The new structure it will be slab on grade with no basement with footings 4 feet deep. There also will be trenching for utilities for the new building (water service, gas, sanitary sewer) from the new building to the south

along the 8 Mile road right-of-way. The deepest ground disturbance will extend to 4 ft for footings. Shallower disturbance will occur for the parking lot(s) and landscaping, as well as the 2 ft depth of soil removal for hazardous waste.

The project is located in the S ½ SE ¼ SW ¼ Section 32, T1N R11E, Oak Park, Oakland County on the 1996 USGS 7.5 minute Royal Oak Quadrangle.

### **Previously Recorded Archaeological Sites and Surveys**

No previously recorded archaeological sites and no previously conducted archaeological surveys lie within the proposed project property.

No previously recorded archaeological sites and no previously conducted archaeological surveys lie within one mile of the proposed project property.

One previously conducted survey lies a little over one mile south of the proposed project, ER00-7.15.141211. The ER number and diminutive size of the parcel suggests the location of a telecommunications tower. No archaeological site was found.

### **Parcel Land Use History**

The project area can be classified as upland. No major drainages lie in the vicinity. The Detroit River lies ca. 10.5 miles (ca. 16.5 k) to the south/southeast. Pre-American settlement vegetation of the project location and surrounding area consisted of wet prairie, which are described as “grass dominated communities, often occurring in wet soils on which shallow flooding occurred seasonally,” (Albert and Comer 2008:xiv-xv,18). Immediately adjacent the east side of the subject project lay Hubbard Marsh as depicted on the 1905, 1924, and 1934 USGS 15 minute Detroit quadrangles. Channelized drains lie at the marsh’s north and south extremities. The area remained un-platted and rural at those dates. The 1936 USGS 7.5 minute Royal Oak Quadrangle indicates the much of the surrounding area had been platted, that Hubbard Marsh apparently had been drained, and a north-south channelized drain not present on the previous quadrangle maps appears along the west boundary of the subject property.

The project traverses two soil types. The majority of the subject property consists of soils classified as Midtown gravelly-artifactual sandy loam, 0 to 2 percent slopes, classified as somewhat poorly drained. The east one-quarter of the proposed project property consists of Urban land - Fortress family complex, 0 to 4 percent slopes, with loamy sand over “gravelly-artifactual sand.” No drainage classification is provided for Urban land. Fortress Family is classified as moderately well drained (Soil Survey Staff 2023).

The first land patent purchase from the U. S. government of the project location occurred 8/14/1937 of the E ½ of the SW ¼ of Section 32 by Henry G. Hubbard, Thomas H. Hubbard and Douglass Houghton. The original American land survey occurred in 1818. The township plat created from the surveyors’ notes includes no cultural data but notes swamp on the south border of Section 32 (United States Department of the Interior 2023).

The above referenced USGS quadrangle maps indicate that Oak Park did not extend south to the subject property until sometime between 1934 and 1936. The area remained rural until then and probably largely agricultural. The 1896 and 1908 atlases

indicate that the village of Royal Oak occupied portions of Sections 15, 16, 21 and 22 to the north. In 1896 William McGee owned the 80 acres in the S ½ SW ¼ of Section 32, and in 1908 Margaret McGee owned the 80 acres within which the subject property resides (Kace Publishing Company 1896:45; Ogle and Co. 1908:64). Two residences are depicted on both of the atlases, one of which appears to be that present on the 1905, 1924, and 1934 USGS 15 minute Detroit quadrangles west of the subject property's west boundary. By 1936 per the USGS 7.5 minute Royal Oak Quadrangle of that date the residence no longer existed, and a structure at the location of the existing WWJ transmitter building appears. The historic quadrangle maps are included with this assessment

In regard to the existing a brochure provided by developer Union Joints, LLC, states that "This historical building was once used for the studios of radio station WWJ. The building was built in 1936 for the Scripps family, which owned WWJ and The Detroit News, from whose offices the station originally aired its broadcasts. The station went on the air on Aug. 20, 1920 and was known by the call signal 8MK until 1921. The transmitter building shuttered in 1995," (Thakady n.d.).

### **Evidence of Previous Disturbance**

Past and current disturbance and use of the project location relates to the existing (vacant) radio transmitter building and driveway. The developer has also indicated hazardous waste (asbestos, lead paint, and/or PCBs associated with PCB-contaminated transformer fluid which has contaminated the building's basement) must be removed from an area of the property outside of the building. Historically the area likely served agricultural purposes based on the 1896 and 1908 county atlases.

### **Summary and Recommendations for Section 106 Application Part VI. Determination of Effect: No Historic Properties Will Be Affected**

ACCR recommends a determination of No Historic Properties Affected Will Be Affected. In regard to the potential for Native American sites, the location of the proposed project was likely attractive for hunting and gathering given that the wet prairie setting overlooked Hubbard Marsh immediately to the east of the subject property. Bison inhabited wet prairie, and the last one in Michigan was shot in 1865 on prairie near the Detroit Metropolitan Airport. Settlers, including the French harvested wet prairie grasses for "marsh hay" "and the remnants of the shallow ditches created by these early farmers can still be seen," (Albert and Comer 2008:xv). However the seasonally wet nature of the project area may have limited the subject property's use by Native Americans for habitation including camping for any extended period. Short term camps might exist, leaving little or no evidence. No known historic structures stood within the subject property except for the existing transmitter building constructed in 1936. Also, to date no sites have been recorded within the subject property or within one mile of it.

## References Cited

Albert, Dennis A. and Patrick J. Comer. 2008. *Atlas of Early Michigan's Forests, Grasslands, and Wetlands*. Michigan State University Press, East Lansing.

Kace Publishing Company, The. 1896. *Illustrated Atlas of Oakland County, Michigan*. The Kace Publishing Company, Racine, Wisconsin.

Ogle, Geo. A. and Co. 1908. *Standard Atlas of Oakland County Michigan Including a Plat Book of the Villages, Cities, and Townships of the County*. Geo. A. Ogle and Co., Chicago.

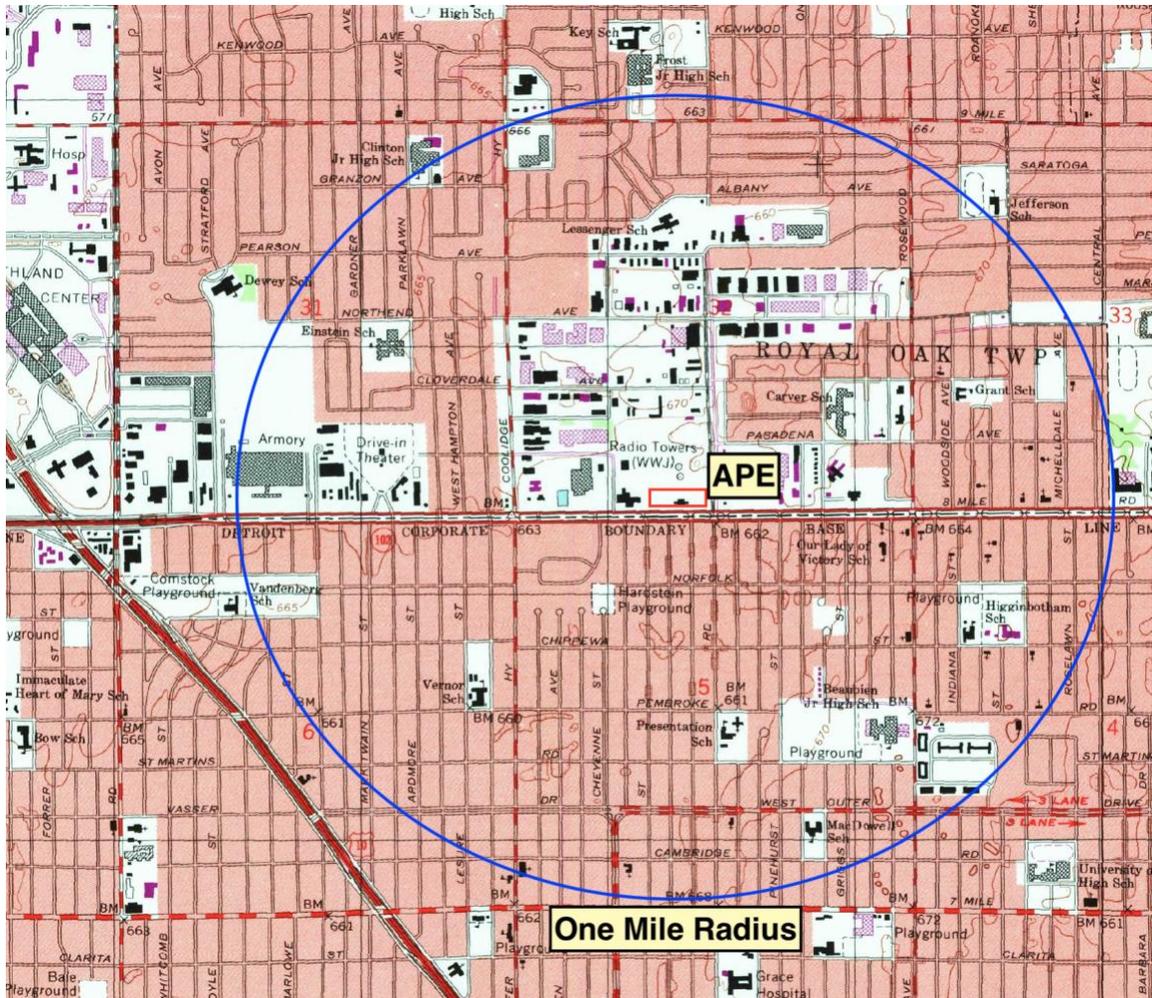
Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. 2022. Web Soil Survey. Electronic document

<http://websoilsurvey.sc.egov.usda.gov/>, accessed January 16, 2023.

Thakady, Anil. N.d. *Project: 8MK*. Brochure. Union Joints, LLC.  
thakady@unionadworks.com

United States Department of the Interior, Bureau of Land Management. 2023. General Land Office Records. Land Patents. Michigan, Oakland County, Section 32, T1N R11E. Electronic document,

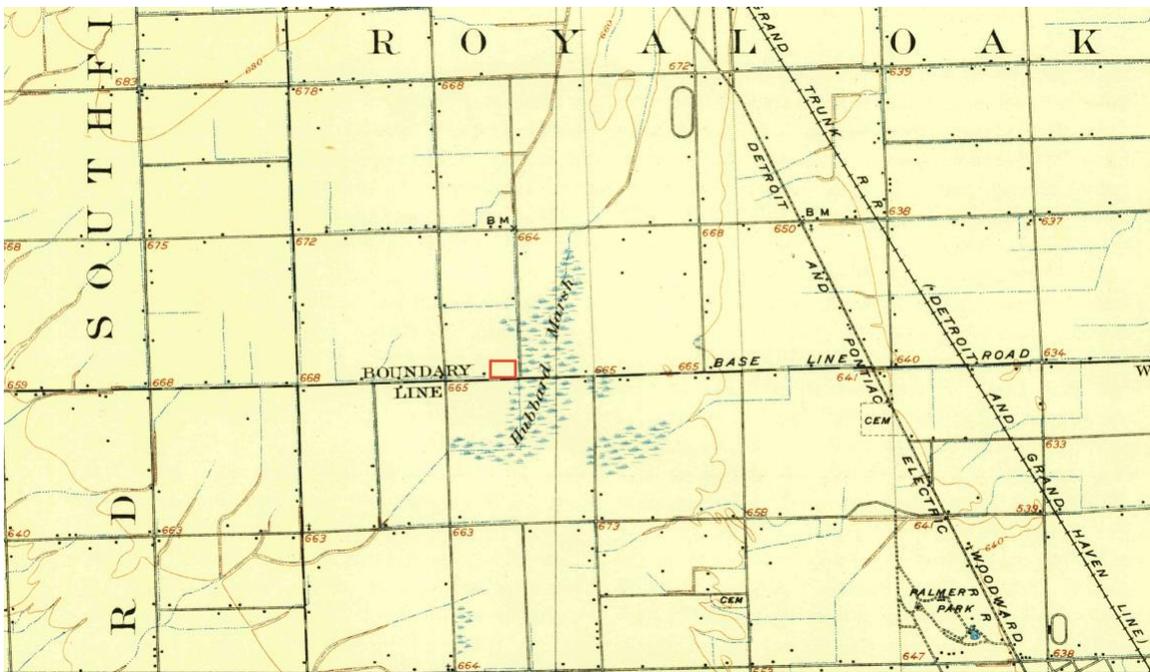
[https://glorerecords.blm.gov/results/default.aspx?searchCriteria=type=patent|st=MI|cty=125|twp\\_nr=1|twp\\_dir=N|rng\\_nr=11|rng\\_dir=E|sec=32|sp=true|sw=true|adv=false](https://glorerecords.blm.gov/results/default.aspx?searchCriteria=type=patent|st=MI|cty=125|twp_nr=1|twp_dir=N|rng_nr=11|rng_dir=E|sec=32|sp=true|sw=true|adv=false), accessed January 17, 2023.



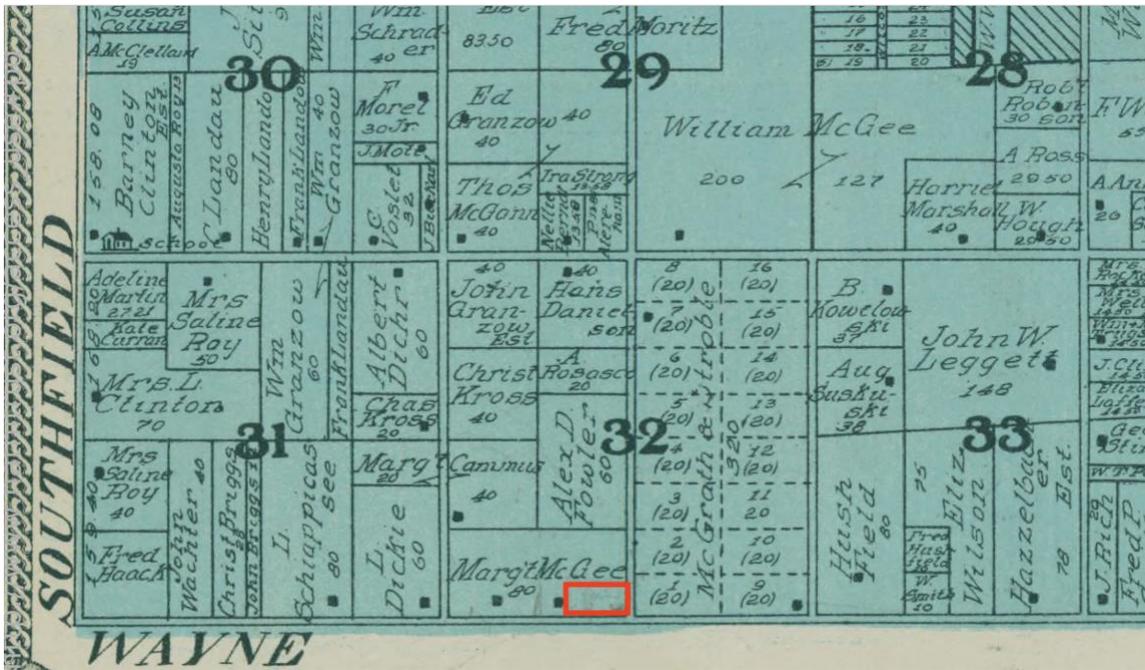
**Archaeological sensitivity map.**  
**1996 USGS 7.5 minute Royal Oak Quadrangle.**  
**No archaeological sites have been recorded, and no archaeological surveys have been conducted in the direct APE (subject property) or within one mile of it.**



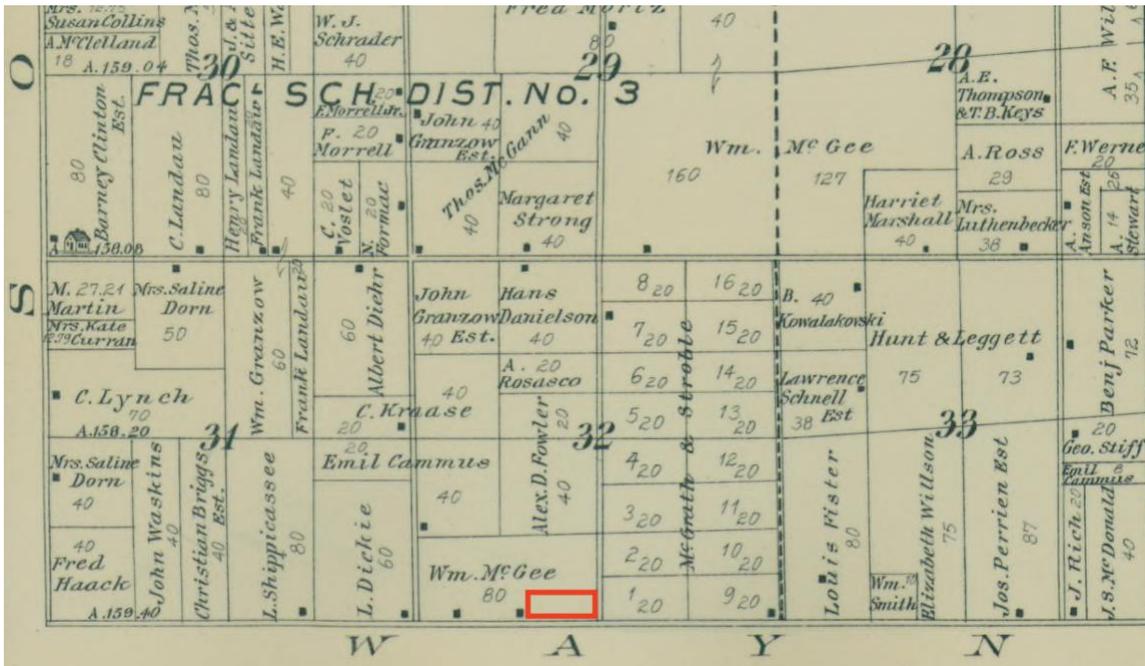
**Google Earth Aerial Imagery, 6/2022.  
The red polygon approximates the direct APE/subject property.**



**USGS 1905 15 minute Detroit Quadrangle.  
The red polygon delineates the direct APE. Note Hubbard Marsh to the east of it.**



Kace Publishing Company (1896:45).  
The red polygon delineates the direct APE/subject property.



Ogle and Co. (1908:64).  
The red polygon delineates the direct APE/subject property.



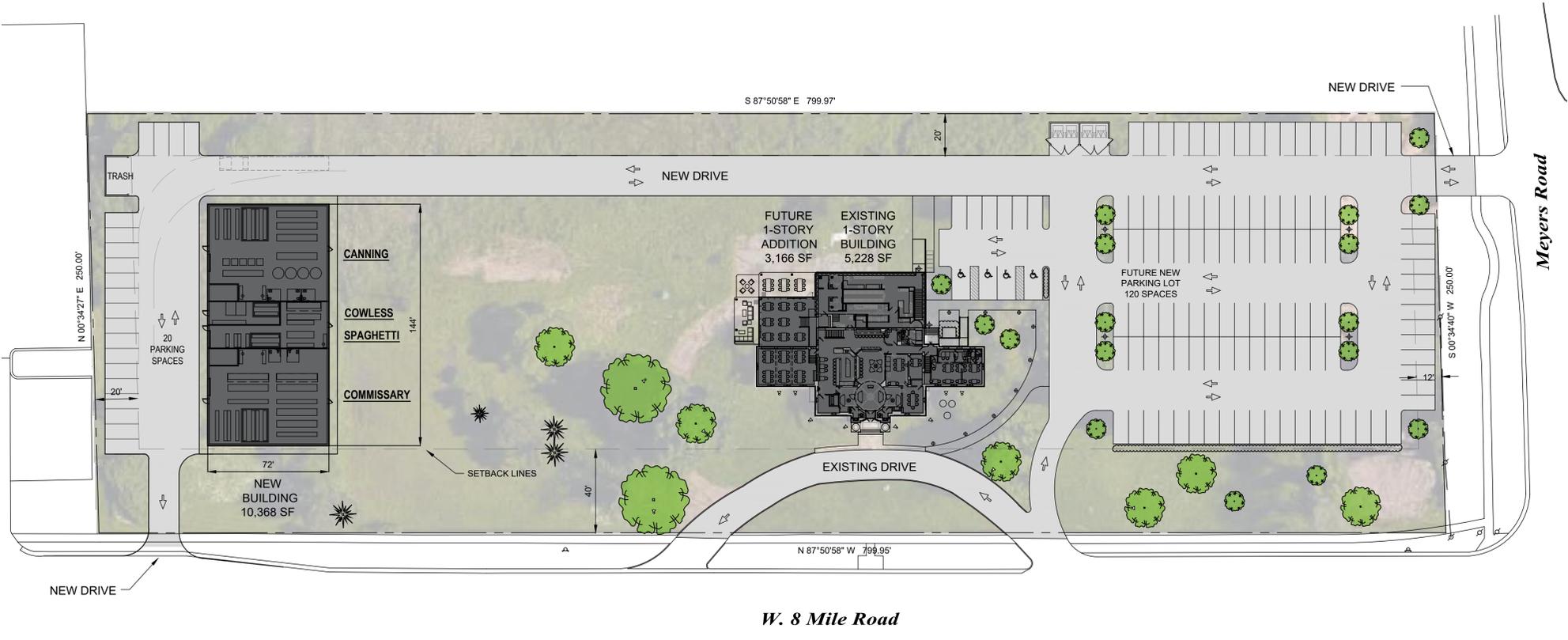
2 SITE PLAN - NEW BUILDING OPTION 1 - B  
SCALE: 1" = 40'

**NEW BUILDING FOOTPRINT - OPTION 1**

NEW BUILDING = 34' X 284'	9,656 SF
COMMISSARY KITCHEN	3,468 SF
TIN CANNING	3,468 SF
COWLESS ICE CREAM	680 SF
MOM'S SPAGHETTI	2,040 SF



1 SITE PLAN - NEW BUILDING OPTION 1 - A  
SCALE: 1" = 40'



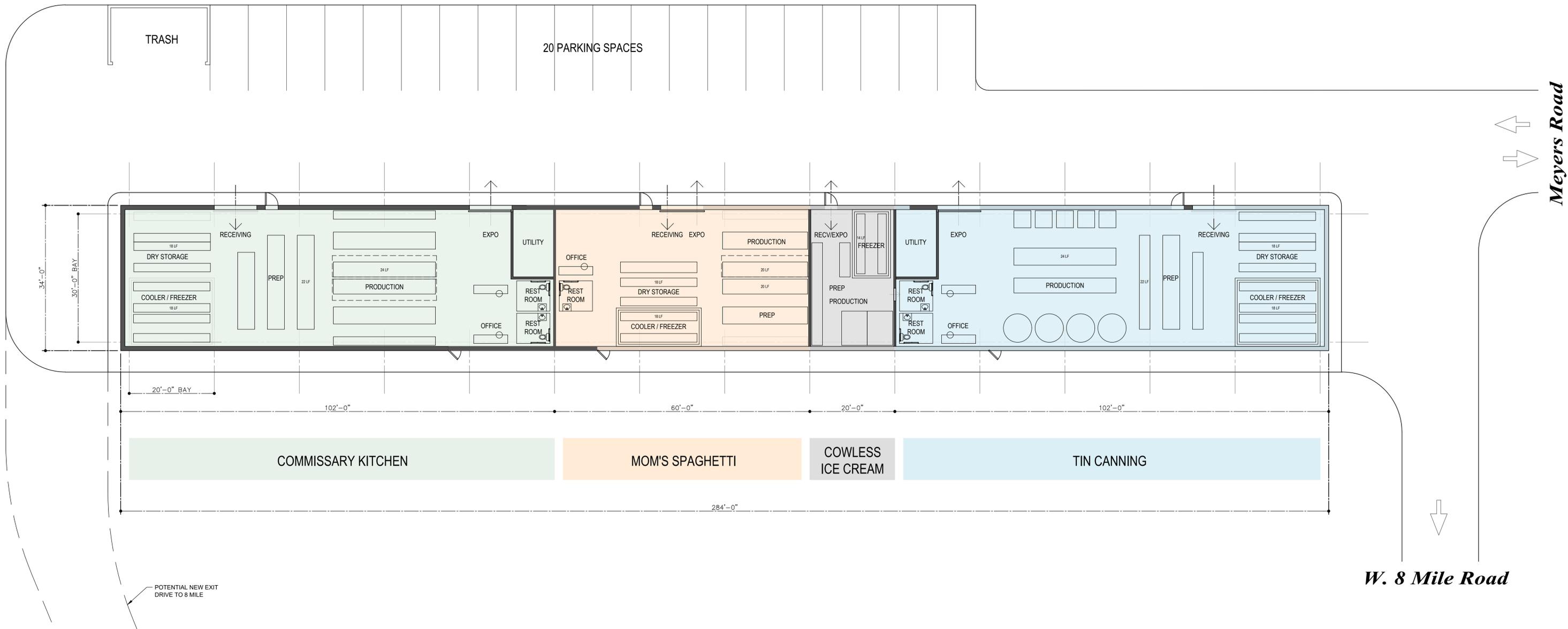
2 SITE PLAN - NEW BUILDING OPTION 2 - B  
SCALE: 1" = 40'

**NEW BUILDING FOOTPRINT - OPTION 2**

NEW BUILDING = 72' X 144'	10,368 SF
COMMISSARY KITCHEN	4,176 SF
TIN CANNING	4,176 SF
COWLESS ICE CREAM	600 SF
MOM'S SPAGHETTI	1,416 SF



1 SITE PLAN - NEW BUILDING OPTION 2 - A  
SCALE: 1" = 40'

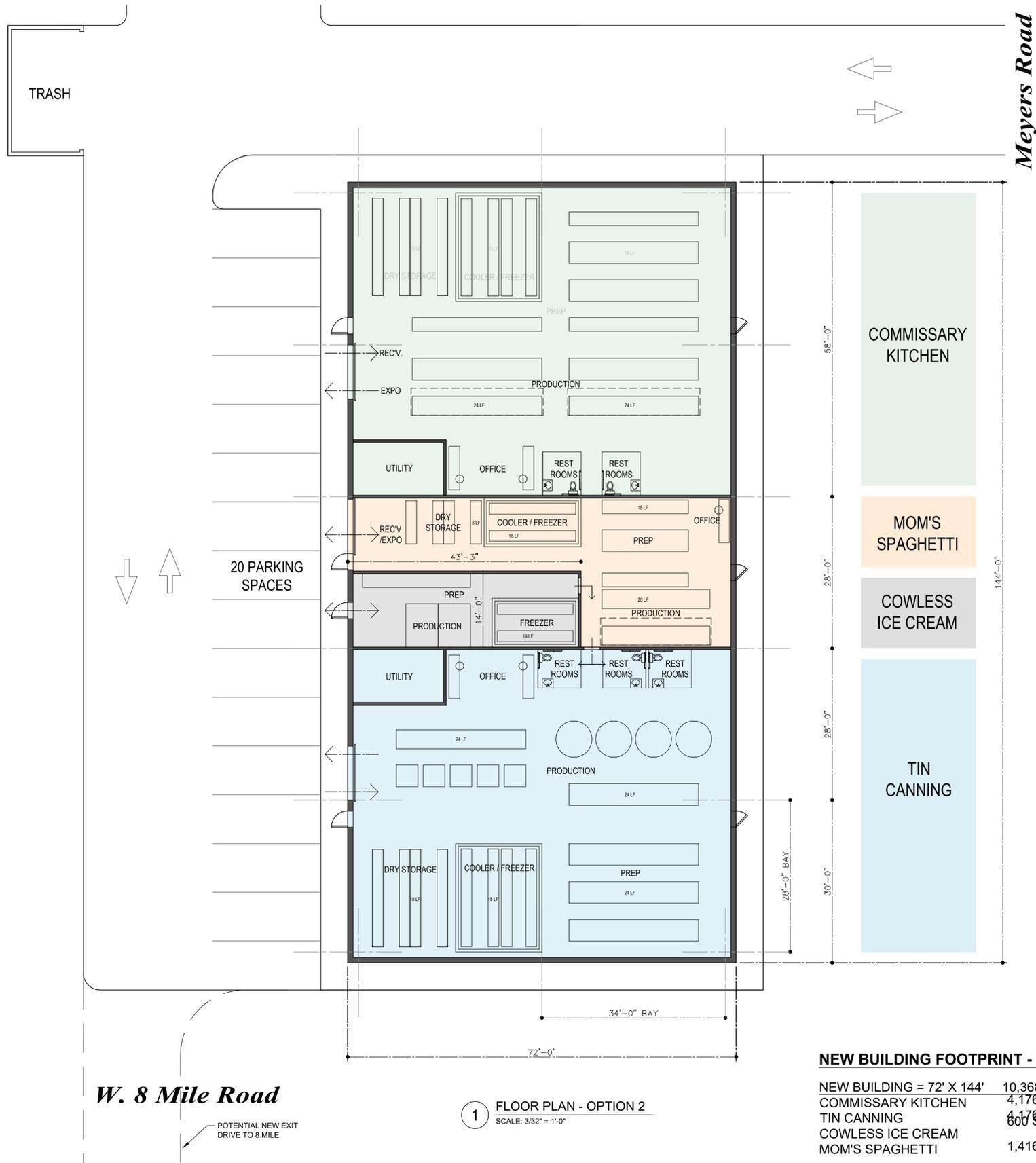


**NEW BUILDING FOOTPRINT - OPTION 1**

NEW BUILDING = 34' X 284'	9,656 SF
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COWLESS ICE CREAM	680 SF
MOM'S SPAGHETTI	2,040 SF

1 FLOOR PLAN - OPTION 1  
SCALE: 3/32" = 1'-0"





**W. 8 Mile Road**

POTENTIAL NEW EXIT  
DRIVE TO 8 MILE

1 FLOOR PLAN - OPTION 2  
SCALE: 3/32" = 1'-0"

**NEW BUILDING FOOTPRINT - OPTION 2**

NEW BUILDING = 72' X 144'	10,368 SF
COMMISSARY KITCHEN	4,176 SF
TIN CANNING	600 SF
COWLESS ICE CREAM	
MOM'S SPAGHETTI	1,416 SF

