



CITY OF FRANKFORT

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March 31, 2009

Dena Sanford, Architectural Historian
United States Department of Interior
601 Riverfront Drive
Omaha, Nebraska 68102-4226

Re: Portion of Station Frankfort
100 Coast Guard Road, Frankfort, Michigan 49635
1-U-MI-582A

Dear Ms. Sanford:

I have received your letter dated March 2, 2009 concerning the review made by SHPO and the NPS regarding the adaptive re-use of the former Coast Guard Station in the City of Frankfort, Michigan.

I appreciate the review and the due diligence associated with maintaining the maritime heritage connected with the presence of this United States Coast Guard facility in our community. At the time the site was deemed as excess surplus property by the GSA, many in the community believed the facility should have been renovated by the Department of Homeland Security in lieu of constructing a new structure less than 200 feet away. Nonetheless, as the property was made available, the City of Frankfort was committed to procuring the site for the purpose of establishing a new recreational and cultural center for the community. Initially, we believed the facility would have made a wonderful maritime museum, however, the Benzie Historical Museum was not interested and no other local group was willing to take the project on. The vision for the viability of the site was immediately transferred to the utilization of the facility as an arts and cultural center fulfilling a niche in the community as we transition into the "new economy". After much deliberation it was determined by the City of Frankfort that the highest and best use of the facility was to conduct an adaptive re-use through a partnership with the Crystal Lake Art Center (CLAC). At the time discussions were underway with CLAC, they were in the process of conducting a fundraising feasibility study and preliminary designs for a new facility and/or expansion at their existing site. Immediately, the concept of utilizing the former Coast Guard facility for the long term home of CLAC sparked a tremendous amount of interest as a project such this would contribute so much to the community in so many ways. This partnership generated excitement in the community because the CLAC was, and still is, experiencing an increase in membership and services offered to the community. The community was confident that the adaptive re-use of the facility would improve economic development opportunity while preserving and enhancing the architectural and historic integrity of the structure.

I believe the major challenge we face toward utilization of this facility is the adaptive re-use of the existing boat room. This space is the largest open space within the facility and would be ideal to meet the needs of a gallery space. I do appreciate the fact that this space is the most intact representation of a boat room of this type of facility in the State of Michigan. However, the majority of the structure has been renovated and modernized, both the interior and exterior, throughout the years of operation by the United States Coast Guard. The "original" character of the facility has already been compromised under the management of the United States Coast Guard in order to meet ever changing needs and budget constraints. Due to recent changes to the boat basin made by the United States Coast Guard the boat room will never be able to be utilized as it once was, serving as a means of storage and maintenance of Coast Guard marine vessels. The site was severely compromised as the result of the Federal Lands to Parks program, thus limiting opportunities for positive re-use of the site and facility.

Historically, the community associates the conservation of this facility to predominately consist of exterior preservation. Other than a few field trips and other special occasions have the public viewed the interior of this facility or any other facility owned and operated by the United States Coast Guard. Even if we reached a compromise to add on additional space, the site cannot efficiently support the increased intensity and we believe the historic integrity of the structure and site will be significantly compromised. The City of Frankfort has been supportive of this process and is in full agreement with Quinn Evans that Scheme F provides a compromise to meet the needs of CLAC, the community, and historic preservation to this facility.

Adaptive re-use of the boat room has proved to be a challenge and I believe all creative solutions may have been exhausted. The design is flexible, thus enabling conversion back to the existing condition at a time in the future, if necessary. The defining features of this facility lies with the exterior. Also, even if we were able to preserve the boat room in an as-is condition it would not meet ADA requirements, thus minimizing public exposure due to safety.

The Frankfort Life Boat Station was used as an example to achieve character-defining features. I am assuming this relates to the recently renovated Elberta Life Saving Station. If this is the case, this facility achieved historic preservation to the exterior, however, the interior does not at all look like what this facility resembled when it was constructed and operated as a life saving station.

Upon receiving your letter, I met with representatives of the CLAC and engaged in a conference call with the Architect, Michael Quinn, to determine what options we have to continue toward an effective utilization of this facility while meeting the standards of SHPO. To meet the standards of SHPO it was all agreed that the remaining useable area of the site comprised with an increase in building footprint will drastically compromise the integrity of the site and will negatively impact the most noticeable attribute to the historic preservation of this structure. This option will significantly increase the cost associated with the adaptive re-use and may not meet the needs of the CLAC. Also, it was determined that parking, adequate exhibit space, and sufficient educational space is essential to the efficient operation of this facility. Without some assurance that these objectives will be met within a suitable budget, CLAC may have to abandon the goal of utilizing this site for the purpose of an arts and cultural center. CLAC is prepared to invest \$2.2 million into this facility, which will insure short term sustainability and long term

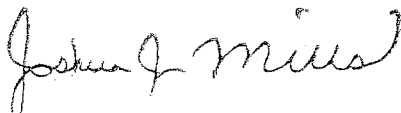
preservation of this historic structure. As far as parking standards go, regardless of use, on-site parking is essential and a must to meet any demand placed on the utilization of the structure. There is no other group willing to perform this activity or invest the necessary funds to neither preserve all of the exterior components of the structure nor perform on-going maintenance to insure the useful life of the facility is expanded beyond our generation. Also, we cannot overlook the social and economic development impact this will have on our community which I am confident will exceed all expectations.

We have to ask ourselves this question: Is a plan to completely renovate the exterior to replicate the structure, as-built, with a viable use a better plan than performing a complete or partial re-design of the structure through an addition and further compromising the site to insure that the boat basin remains in tact? Now, it is my opinion that the majority of people would suggest an adaptive re-use of the interior and performing a complete renovation of the exterior would be a better solution toward preservation and economic sustainability than further compromising the site and destruction to the historic exterior to achieve preservation of the un-useable boat room.

With the American Recovery and Reinvestment Act in full swing I believe it is in everyone's best interest to support the City of Frankfort and CLAC to achieve a desired adaptive re-use for this facility. This project will create jobs and provide an enhanced service, thus enabling us to improve the social and economic well-being of this community and keep in the spirit and intent of the economic stimulus program. With an already achieved budget of \$2.2 million, short term construction jobs will become available, area suppliers will benefit, and overall local commerce will experience a positive economic trickle down effect. I am pleading with SHPO and the United States Department of Interior to enable this project to come to fruition through approval of Scheme F. Utilization of the boat room as a useable gallery space is critical to the success of this project. As I have stated above, we are in full support of historic preservation of this facility, however if a suitable resolution or compromise cannot be met and accepted by CLAC, the City of Frankfort will have no choice but to revert the property back to the Department of Interior.

I believe we are at a point that "we can agree to disagree" with the standards placed upon this project and the major obstacles associated with achieving these unachievable standards. I hope we could continue deliberations to meet a compromise with SHPO and the Department of Interior in order to achieve a *win-win* scenario that will enable a historic structure to be preserved while enhancing economic development opportunity for the community.

Sincerely,



Joshua J. Mills
City Superintendent

Cc: Brian Conway, State Historic Preservation Officer
Lee Harper, Executive Director of Crystal Lake Art Center
Michael Quinn, Quinn Evans Architects
Elyse LaForest, Federal Lands to Parks Program



United States Department of the Interior

National Park Service
Midwest Region
601 Riverfront Drive
Omaha, Nebraska 68102-4226



H30 (MWR-CR/HNRP)

March 2, 2009

Joshua J. Mills, City Superintendent
City of Frankfort
412 Main Street, PO Box 351
Frankfort, MI 49635-0351

Reference: Portion of Station Frankfort
100 Coast Guard Road, Frankfort, Michigan 49635
1-U-MI-582A

Dear Mr. Mills:

The National Park Service (NPS) Federal Lands to Parks Program deeded the referenced property to the City of Frankfort in July 2006. It was deeded at no cost, provided the property was used for park and recreational purposes, in perpetuity. Because the property was eligible for the National Register of Historic Places, a covenant was placed in the deed which required consultation with the Michigan State Historic Preservation Office (SHPO) prior to any alternation to the building. Subsequently, the SHPO has determined that the Frankfort property is the most intact example of this property type in the state.

The City's the Program of Utilization (POU) submitted as part of the application for the property, prepared June 24, 2005, states in part:

The proposed use of the subject property is for a community recreational/cultural center. The property is developed with one main building, an attached two bay garage/boat storage area and a detached three bay garage with approach driveway off of Coast Guard Road. ... There are no plans to further develop the property at this time other than to increase available parking to accommodate public use.

The city stated that they and CLAC were committed to maintaining the structural and historical integrity of the buildings, and to complete *both* interior and exterior renovations over a period of four to five years in a manner that would ensure the building's architectural and aesthetic integrity. Other areas of the application similarly downplayed the need for extensive renovations, although it was mentioned that the Crystal Lake Art Center (CLAC) was in the process of completing a feasibility study.

The architectural firm of Quinn Evans produced a concept design for rehabilitation of the Frankfort Station in 2006. It appears that the firm did not consult with the SHPO until mid- to late 2008 when the plan was already well developed. By letters dated July 25 and October 27, 2008, the SHPO determined that the preliminary concept design and subsequent revisions failed to meet the *Secretary of the Interior's Standards for the Treatment of Historic Buildings (Standards)*. Many concerns were raised about the plan, included but not limited to:

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- the proposed treatment of the interior boat bay space—identified by the SHPO as the most important character-defining feature of the property;
- the second floor dormitory;
- major reconfiguration of spaces which visually impact the building;
- exterior renovation that are not in keeping with the character of the building;
- and extensive site changes including the installation of a pergola, parking areas and a vehicle turn around.

Quinn Evans/CLAC did not agree with the SHPO's recommendations, and accordingly the NPS was asked to review the plan, in keeping with section 4 of the property's Historic Preservation covenant.

We fully support SHPO's recommendations, but after reviewing the proposed renovation "Schemes" we found further areas where we feel the *Standards* will not be met. Because the Application prepared by the City was for a recreational program, little detail of the historic structure was included, or required. Accordingly, we have prepared a list of character-defining features, distinctive materials, finishes, construction techniques and examples of craftsmanship which characterize the property and which must be maintained according to the *Standards*. We have attached that list as enclosure one to the letter.

Our specific recommendations follow:

First Floor:

Treatment of the boatroom space is challenging -- CLAC's desire for optimum gallery space must be balanced with the importance of maintaining this important aspect of the building's character. Locating an elevator and staircase into this space would not meet the *Standards* as they would introduce strong vertical elements into the space. "Scheme D" is the least intrusive design as it moves the elevator into the east wing of the building.

Gallery B bisects the historic volume of the boatroom space and is not in keeping with the *Standards* as the SHPO has noted. We concur with the SHPO's guidance for limiting intrusions into the space, and considering such design concepts as a connecting bridge and transparent or minimal railings. Utilizing transparent flooring materials such as structural glass might also meet the *Standards* for a reduced-size Gallery B. It would appear that reducing the size of Gallery B would still meet CLAC's space needs, as the original estimate of Gallery B floor space offered roughly 700 more square feet than was calculated for a new building.

The pattern of a centrally-placed pedestrian door flanked by oversized doors should be retained for the north side of the building (Gallery A). Infilling the central door, or replacing it with a double door, or recessing the entrance do not conform with the *Standards*. Sensitively-designed new doors should reference the historic ones, considering materials, pane number, etc. Smaller pedestrian doors could be incorporated into a larger opening that mimics the historic panel and glass designs as shown on the historic Coast Guard drawings.

The proposed skylight over the center of Gallery A is acceptable as it will not be seen from the exterior, and will increase interior illumination.

Pursuant to electronic mail correspondence from Mike Quinn to Dena Sanford, installing a 4" concrete floor with radiant heating above the historic floor (Gallery A), meets the *Standards* in that it will retain the historic industrial character of the space.

Basement:

We do not support removing the sloping concrete floor to create a lower multipurpose room, one of the key distinguishing and intact features of the primary boat space. Instead, accommodating additional space needs through the construction of an addition at the northwest corner of the building could meet the *Standards*.

Second Floor:

The variety of second floor designs reflect the attempts of Quinn Evans to accommodate CLAC's desired educational spaces with a goal of retaining the second floor historic footprint. The building's dual service as a boat-launching facility and dormitory necessitates consideration of the character-defining elements of the second floor. As the *Standards* state, "An interior floor plan, the arrangement and sequences of spaces, and built-in features and applied finishes are individually and collectively important in defining the historic character of the building." While each of the various proposals has some positive attempts to retain the second floor footprint, the proposed layout of Schemes F and D show greater success. The placement of the elevator core outside of the boat room's volume as presented in "Scheme D" represents the best effort to comply with the *Standards* in that regard.

Regarding the desire for providing large volumes of space for classrooms, we suggest greater consideration for retaining historic fabric and referencing historic volumes. For example, several of the dormitory rooms could be combined into one space by removing most of the dividing walls, yet retaining stub walls and a slightly dropped archway. Representation of former walls could be incorporated on floor coverings. Consider retaining the presence and use of secondary spaces (storage rooms, utility closets, etc.) for their historic purpose or for accommodating other utilitarian functions such as restrooms.

The issue of "reversibility" (addressed in *Standard 10*) has been raised during the evaluation of these designs. The most significant concern is proposing to raise the ceiling height of Classrooms A and B, on the justification that this is reversible because original design documents exist. Any construction work might be considered reversible by its nature; however, such action is not in keeping with the *Standards*. Raising the ceilings does not retain the historic character or volume of the second floor space. Opening the ceilings to the above dormers is likewise not in keeping with the *Standards*. While design standards might suggest a specific volume relative to square footage for new construction, retention of historic fabric takes precedence for this resource.

Garage:

Pending confirmation that the SHPO determined the garage non-historic, we have no objection to the proposed treatment as described in the January 20, 2009 letter from Michael Evans, Quinn Evans Architects to Dena Sanford, NPS.

Site:

We concur with the SHPO comments of July 25 that hard surfaces should be minimalized.

The *Secretary of the Interior's Standards* frequently challenge our partners in preservation to develop creative solutions that will meet the needs of the occupant while ensuring preservation of an historic resource's character-defining features. The Frankfort Life Boat Station is such an example. While we have determined that the latest proposed design, "Scheme F," does not comply with the *Standards*, we are

confident that the City of Frankfort, CLAC, and Quinn Evans Architects will successfully meet this challenge.

We ask that you consult with your partner, the Crystal Lake Art Center and their contractors, Quinn Evans Architects, to address these comments and prepare a revised rehabilitation plan that meets the *Standards* and fulfills the recreational/cultural needs contained in the POU. If you have questions, please contact Dena Sanford at 402-661-1944 or via electronic mail at dena_sanford@nps.gov, or Elyse LaForest at (617) 223-5190 or elyse_laforest@nps.gov. If you would like to discuss further, we could also schedule a conference call at your convenience.

Sincerely,



Dena Sanford
Architectural Historian



Elyse LaForest
Program Manager
Federal Lands to Parks Program

cc:

- ✓ Brian D. Conway
State Historic Preservation Officer
Michigan Historical Center
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Lansing, Michigan 48909-8240
- ✓ Lee Harper, Executive Director
Crystal Lake Art Center
111 10th Street
Frankfort, MI 49635
- ✓ Michael L. Quinn, FAIA
Quinn Evans Architects
219 ½ N. Main Street
Ann Arbor, Michigan 48104

Enclosure 1

Character-Defining Features, Finishes, Construction Techniques and
Examples of Craftsmanship Which Distinguish the Frankfort Coast Guard Station Property

Because the PU does not identify such distinctive materials, features, finishes, etc., the NPS identifies the following:

- Site: The open, grassy location faces onto Frankfort Harbor. Other than a low concrete wall that defines a lawn area on the south, east and portions of the north, there are few landscape improvements. This is in keeping with the utilitarian nature of the station, and allows for clear views of the property from several vantage points. Various sidewalks connect the rear to the front of the building. The Coast Guard retains the property between the building and the water to the south and west; a developer to the east plans to demolish the east wall.
- Boat Channel: This feature is a primary character-defining feature of the property. It was critical to the operational success of the boat station, providing a link between the building and Frankfort Harbor, allowing deployment of the Coast Guard boats. Excavation necessary for its creation resulted in a “negative” space in front of the boat station. This channel appears largely intact, and is used by the Coast Guard.
- Massing: The symmetrical design and compact massing of the building reflects the utilitarian nature of the building. It is intact and is an important feature of the property. The hipped roof, attic dormers and small, harbor-facing entry porches do not appear to contain elaborate detail, and rather function as design elements necessary for the operation of the station. No major additions have been made to the building.
- Station Exterior Envelope: The historic materials apparently survive underneath the 1980s era aluminum cladding. The historic patterns of windows and door openings remain intact, important features of the property. However, individual items such as doors, garage doors, double-hung windows and roofing material have been replaced.
- Boat Channel Doors: These three doors served as the portal between the most functionally significant exterior and interior spaces: the Boat Channel and the Boatroom. While the original doors have been replaced, the openings are intact.
- Garage: This support structure is of secondary importance, but supports the story of the evolution of operations at the station. The massing, door and window openings appear intact, although the envelope materials are modern.
- Interior Space – Boatroom: This large, main interior space is the most important character-defining feature of the property, as the Coast Guard designed the building to house life boats and the people who operated them. Simple metal columns supporting the building’s upper stories enhance the openness of the space, and the lack of ornamentation expresses the utilitarian nature of the property. The sloped concrete boat room floor with integral steel boat rails are key features of this room, and are an intact and rare example of the historic function of this key space.
- Interior Space –Dormitories: The second floor is characterized by a double-loaded hallway, the rhythm and repetition of doors along the hall and the number of rooms reflective of the number of Coast Guard staff needed to operate the life boats. The arrangement of doors and spaces is similar to a hotel’s arrangement of guest rooms. A remodel in 1982 impacted integrity to some degree with the installation of a second bath and creation of a private suite. A staircase installed in the late 1980s or 1990s replaced an attic hatch access.
- Interior Space –Support rooms: These rooms provided a variety of service and administrative functions. Various wall coverings have been applied to the rooms. While important to telling the story of how the station operated, these spaces are of lesser importance than the central boat bay.



United States Department of the Interior



National Park Service

Midwest Region
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H30 (MWR-CR/HNRP)

March 27, 2009

Joshua J. Mills, City Superintendent
City of Frankfort
412 Main Street, PO Box 351
Frankfort, MI 49635-0351

Reference: Portion of Station Frankfort
100 Coast Guard Road, Frankfort, Michigan 49635
1-U-MI-582A

Dear Mr. Mills:

This letter serves as a follow-up to the March 2 letter regarding proposed work at the Frankfort Station. It is intended to clarify and avoid any misunderstandings as the rehabilitation of the project proceeds.

- Page 2: The National Park Service (NPS) is required to review and approve plans according to the property's Historic Preservation Deed Covenants, which state in part, "Plans of proposed rehabilitation ... shall be reviewed and approved by the Secretary in consultation with the SHPO [State Historic Preservation Office] for consistency with the *Secretary of the Interiors Standard's for the Treatment of Historic Property*." In 2008 the Michigan SHPO referenced the wording of the covenant and realized that the NPS, acting on behalf of the Secretary, was required to approve plans.
- Page 3: The addition mentioned at the top of the page was in the northeast corner, not the northwest corner. The northeast corner is the least visible portion of the site from the public right of way.
- Page 3: Regarding retention of the second floor footprint, "Scheme D" is the best approach regarding a goal of moving the elevator entirely out of the central hall. However, "Scheme D" is not successful in retaining the second floor footprint and a central, double-loaded hallway. That desirable condition is suggested to a greater extent in "Scheme F".

If you have questions, please contact me at 402-661-1944 or via electronic mail at dena_sanford@nps.gov, or Elyse LaForest at (617) 223-5190 or elyse_laforest@nps.gov.

Sincerely,

Dena Sanford
Architectural Historian

National Register Programs

cc:

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