



United States Department of the Interior

National Park Service
Midwest Regional Office HNRP: KS, NE, MI, MN
c/o Agate Fossil Beds National Monument
301 River Road
Harrison, NE 69346



IN REPLY REFER TO:

September 2, 2011

H34 (MWR/NHRP-CR)

Mr. Kenneth W. Jendryka, Chairman
Hospital and Neighborhood Committee
c/o Marshall Town Hall
323 West Michigan Ave.
Marshall, MI 49068

Dear Mr. Jendryka,

Thank you for providing the National Park Service (NPS) documentation regarding the proposed Hospital Campus Overlay District (HCOD), for Oaklawn Hospital (the hospital) in Marshall, MI. The NPS appreciates the time and effort involved in developing these documents, in addition to the information regarding the hospital's projected growth needs for the next 20 years. Reflective of that need, the documents emphasize accommodation of new hospital construction within the proposed overlay district, located within the larger Marshall Historic District National Historic Landmark (NHL). From the perspective of providing for continuing consideration and protection of historic resources within the proposed overlay, the documents fall short of goals established in the city of Marshall's Master Plan. Our office therefore strongly encourages revisions to portions of the draft text.

Given that the goal is to accommodate hospital expansion that is satisfactory to both the community of Marshall and the hospital, the NPS suggests that text be revised to more accurately reflect the city's Master Plan intent to "maintain and enhance the unique, historic character of the community," and "ensure the long term stability of Marshall's neighborhoods." More specifically, the NPS suggests text that directly incorporates *Secretary of the Interior's Standards for the Treatment of Historic Properties*, that allows for serious discussion and consideration of preservation treatment of historic properties within the proposed overlay district, and that ensures a level of design review that benefits both the hospital and the greater community.

Regarding draft text in the proposed HCOD ordinance, the HCOD Subcommittee provided confusing information in the August 5, 2011 "Executive Summary and Recommendations". Text on page 3 states that inclusion of specific requirements regarding historic structures and their treatment by individuals or individual businesses was "inappropriate" in a city ordinance. Please be aware that work on historic resources can be regulated through the proposed overlay zone by including an historic component. Indeed, a great deal of text in the proposed overlay provides specific requirements for new construction, which could apply equally to individuals and individual businesses. The HCOD Subcommittee should be aware that local governing bodies have created overlay districts across the country specifically to protect, preserve and enhance the particular qualities of the districts, in order to achieve the purpose of the overlay district. This can and often does include design standards and guidelines that apply to individuals and businesses within the overlay district. Other than Section 156.188 "Application of Regulations," for the proposed ordinance, it is unclear how regulatory review and approval of standards and guidelines of new construction would be undertaken. We recommend that to be universally applicable to the overlay

district, review of proposed actions on historic resources be included, that it apply to all owners, and include a level of regulatory review.

The proposed solution to treatment of historic resources is the draft Development Agreement. While the NPS agrees with the statement in the HCOD Subcommittee's "Executive Summary and Recommendations" page 3 that "... having a process and plan for Hospital growth is in keeping with the National Park Service's recommendations regarding the preservation of Marshall's NHL status..." is correct, this draft Development Agreement does not establish a process to adequately consider such treatment. The draft Development Agreement establishes a hospital-controlled procedure for consultation with the community regarding treatment of historic resources owned by the hospital. Should this Development Agreement move forward, and revisions not be made to the overlay district to include an historic component, then this document should be revised. In order to comply with the goals of Marshall's Master Plan, the proposed Neighborhood Historic Advisory Committee (NHAC) should consist of community members chosen by the mayor and the city council. We further suggest that the contents of the minutes of the proposed NHAC be available for city review of permits for demolition, relocation, or other site development.

Addressing specific text in the draft Development Agreement, we are concerned with what appears to be a misunderstanding of the *Secretary of the Interior's Standards*, the lack of definitions of certain terms, and the concept of a contributing versus a non-contributing building. While we appreciate the hospital's consideration of rehabilitation of some historic buildings, the procedures for NHAC review of such projects appears to misinterpret the *Secretary of the Interior's Standards*. This is most evident in Item 2.a, review criteria. Guidelines for rehabilitation begins with identifying the form and detailing of those architectural materials and features that are important in defining a resource's historic character and which must be retained in order to preserve that character. It does not begin with identifying the "relative importance in history [sic] of the individual structure." It would be important to note at this point that the Marshall NHL document identifies this area of the district in these terms:

"... it is the exceptionally intact collections and groupings of individual buildings that distinguish this quad, in particular, and the entire district, in general."

Moreover, this area includes some of the oldest residences in the district. Within any NHL district, or National Register of Historic Places district, a building is either contributing or non-contributing; or it has been unevaluated. All contributing buildings play a role in supporting the significance of the NHL district. Beyond this, evaluating the physical condition of a resource's materials and features is important in determining whether, as part of the rehabilitation work, repair or replacement of character-defining materials and features is warranted. Inclusion of Item 2.a.v. is unclear, as this section addresses rehabilitation. A more thorough and accurate application of the *Standards* to this section would strengthen the document's commitment to preservation planning.

There are a number of terms which are not defined in the draft Development Agreement. This includes "Appropriateness of available locations" (Item 2.b.i.1); what is meant here? Also, the term "sufficient significance/sufficient historic significance" (Items 2.b.ii.1. and 3.b.) are inappropriate. As mentioned above, the resources are either contributing or noncontributing to the significance of the NHL district. Finally, we encourage replacing the terms "adaptive reuse" with "rehabilitation", and "may" with "shall."

This office strongly agrees with recommendation 3 in the "Executive Summary and Recommendation" report, regarding the need for the city to consider studying a process for historic preservation outside the HCOD. The Marshall NHL was designated for its unusually high concentration of historic buildings—this includes both prominent commercial buildings in the downtown area, as well as the great variety of residences, large and small. At the time of its designation in 1991, Marshall could boast a very

impressing statistic of over 90 percent contributing buildings in the district. This is highly unusual for any community, even among NHL districts. Absent specific treatment recommendations for individuals or businesses in this overlay district, or elsewhere in the NHL historic district, it is important that the city of Marshall develop a method by which it can achieve the preservation goals established in its Master Plan. Unless this is undertaken, there is no assurance that the long-term "unique [and] historic character of the community," particularly the NHL district, can be maintained and enhanced.

Statement number 4 within the "Executive Summary and Recommendations" report references the "Downtown Area Parking Needs Assessment" by Walker Parking Consultants, and future parking needs for the hospital. We strongly encourage the city to consider a parking structure, rather than to allow continued loss of historic resources through creation of increasing expanses of surface parking. Regarding the cost of surface parking versus parking structure development, it is observed that the calculations did not include the possibility of charging parking fees, nor the cost of property acquisition. Given the importance of Madison's irreplaceable historic resources, it is also unfortunate that the assessment did not identify or address Marshall's NHL status, nor take it into consideration in the "Evaluation Matrix" on page 53. Additional intangibles that would have aided in an accurate assessment of impacts to the NHL include livability, property value, and sense of place/sense of community.

As you are probably aware, as Federal administrator of the NHL program, the NPS is responsible for monitoring NHLs, and submits to the Secretary of the Interior and the public biennial reports on the status of the NHLs, and identifies any known or potentially damaging threats to their integrity. The NHL status designations are "little/no threat," "watch," "threatened," or "emergency," based on increasingly serious levels of impending or actual damage. As I have mentioned in past correspondence with the city of Marshall and hospital staff, the NPS has been concerned about development pressures within and outside of Marshall's NHL historic district. The status of the Marshall NHL in past years has been "little/no threat," although development pressures have been noted. The NPS may consider changing the status to "watch", if the city cannot establish a process and plan that provides for the adequate review and consideration of actions that would impact the integrity of the NHL district.

The NPS greatly appreciates the continued stewardship and commitment of the Marshall community to the preservation of this unique American resource. If you have questions, please contact me at dena_sanford@nps.gov, or by telephone at 308-436-9797.

Sincerely,



Dena Sanford, Architectural Historian
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National Historic Landmarks Coordinator, Michigan

cc:

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