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Bonnie Sontag, Chair
City of Newburyport
Planning Board
60 Pleasant Street
Newburyport, MA 01950

Re: Institution for Savings – 93 State Street

Dear Chair Sontag and Members of the Planning Board:

The purpose of this letter is to document my¹ professional opinion that the related new construction proposed by the Institution for Savings and designed by Architectural Resources Cambridge (drawings December 30, 2020, presented to Newburyport Historical Commission meeting January 14, 2021) conforms to the Secretary of the Interior's Standards for Rehabilitation (Standards) as required by Newburyport's Downtown Overlay District. The Standards include several categories of treatment – Preservation, Rehabilitation, Restoration and Reconstruction. Rehabilitation is the only treatment under the Standards that allows for related new construction or additions. Therefore, this project must be reviewed under the Rehabilitation Standard.

The Standards for Rehabilitation

There are only ten Standards for Rehabilitation (Standards); they are shown in full in an attachment to this report. They are necessarily general as they are intended to be applied to buildings of all types, location, size and age. In 2017 the latest edition of the revised National Park Service (NPS) guidelines for interpretation of the Standards was published to provide guidance in applying the Standards. That document provides additional information with regard to considerations such as changes in building codes and handicapped access, categories affecting rehabilitation not included in earlier editions. That said, much of the text repeats earlier editions, and much of the text is, in fact, repetitive within the document. Frequent references are made to terms including *compatible* and *subservient*; these are relative terms requiring evaluation for each project.

¹Dr. Judith E. Selwyn of Preservation Technology Associates, LLC has served as preservation consultant for the historic State Street building of the Institution for Savings for ten years. Dr. Selwyn has over forty years of experience consulting on preservation issues, with an emphasis on materials conservation. Dr. Selwyn has a PhD. from the Massachusetts Institute of Technology and has been recipient of the Massachusetts Historical Commission's 25th anniversary award, the Lifetime Achievement Award of the Boston Preservation Alliance and is Preservation Massachusetts Paul E. Tsongas Profiles in Preservation Honoree.

No mathematical or other formulaic definitions are provided to evaluate words such as “smaller”, “larger”, “higher”, “further”, etc., all guidance is, by necessity, generic. NPS Preservation Brief #14² states “Every historic building is different and each rehabilitation project is unique. Therefore, the guidance offered here is not specific, but general, so that it can be applied to a wide variety of building types and situations.”

In fact, there are no numbers used anywhere in the guidelines to measure or determine if a proposal is consistent with the Standards.³ The guidelines state “There is no formula or prescription for designing a compatible new addition.”

The first steps in evaluation if a project meets the Standards are the *identification of the subject historic building* and determination of the *priorities to be considered in evaluating* the process.

Identification of the Subject Historic Building

- *It is my opinion that the 93 State Street building must be considered the “subject historic building” with reference to this project.*

The State Street building is, by any standard, one of the most architecturally and historically significant buildings in Newburyport. The Institution for Savings has had continuous banking operations in the original banking building since 1872. The original building was designed in 1872 by Rufus Sargent in the Italianate Style and the 1903 addition, designed by Edwin S. Dodge, continues in the same style. The extension of the building in 1903 enlarged both the center and side wings of the building to the east. The original upper roof was a simple gable roof; the 1903 extension provides the east hip section and extended the flat roofs on both sides and to the east. The building also has a 1980’s addition designed by Newburyport architect Jonathan Woodman of Woodman Associates.

The 1984 National Register Nomination (NR) for Newburyport describes most of the surrounding houses as “vernacular” and specifically cites the three structures at #11-13, 15-17 & 19-21 Prospect Street (ca. 1875) as typical lodging/tenement houses found around the City. The Massachusetts Historical Commission “Form G Streetscape” prepared for Prospect Street in 1984 notes that, except for the first block from State Street to Otis Place/Fair Street, the street has buildings on both sides of the street. The form shows the corner lot at Prospect and Fair as vacant and used for parking; until sometime in the first half of the twentieth century it contained a large church building that had a

² The Preservation Briefs are a series of documents, issued periodically by NPS, to provide additional guidance for the treatment of specific materials or project types.

³ Planning and zoning documents are filled with equations and methods of measurement for different building and site attributes, and depending on which attribute is chosen, the results of a comparison may be different. For example take two typical houses, each containing the same number of gross square feet, as defined by the Newburyport Assessor. Building A is one standard story high and Building B is two stories high; Building B is therefore taller than Building A. But, Building A has a larger footprint on its lot than Building B to contain the same number of square feet. If each building is centered on the same size lot, Building B has greater setbacks from the lot line than Building A. But if, Building A is on a lot that is twice as large as the lot for Building B, Building A has half of the FAR (floor area ratio is an often-used planning equation which divides the gross square footage by the size of the lot). Each of these comparisons are based on a well-defined equation or standard; perceived height has no standard.

substantial tower. There was also a large building, described as a rooming house, on the Bank's side of the street.

Priority in Evaluation Process

- *It is my opinion that the relationship between the new construction and the historic Bank takes priority over the relationship between the new construction and the residential homes.*

Both 93 State Street and the surrounding residential buildings derive their historic status by virtue of inclusion in an historic district. While it is acknowledged that it is necessary to look beyond the Bank building itself in evaluating the new construction, relevant guidance about the priority for review comes from 36 CFR Part 67.6 (b)(6), of the National Park Service regulations and these regulations make it clear that all aspects of a rehabilitation, including new additions or related new construction, will be reviewed first as they affect the (subject) historic building and second as they affect the district in which the building is located.

In short, the relationship of the proposed construction to the Bank takes precedence over the relationship to the houses.

Meeting Standards 9 and 10

Review of this project has centered upon Standards 9 and 10 and this paper is therefore limited to discussion of those.

Standard 9 provides:

“New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”

Standard 10 provides:

“New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”

Primary Review – Impact on 93 State Street

- The new construction does not destroy any of the historic materials or features of 93 State Street. It could be removed in the future with no impact on the property or its environment and therefore conforms to Standard 10.
- The new construction has a compatible size relationship with 93 State Street. The footprint of the existing and new construction is roughly comparable, and

the height of the single story monumental historic building is roughly comparable to the two story new construction. Additionally, since the new construction is a considerable distance (+/- 180') from the historic Bank building, the proposal satisfies the guidelines that states that the size of new construction becomes less important when located at a distance from the subject building.⁴

- The simplified design of the new construction ensures that it is visually subordinate to the more detailed historic building and the guidance allows “Depending on its location, it may be possible that an addition slightly taller or slightly larger than the historic building may be acceptable, as long as it is visually subordinate to the historic building.” “The limitations on the size, scale, and design of new construction may be less critical the farther it is located from historic buildings.”⁵
- The new construction retains the existing open, landscape space around the historic building and conforms with NPS Guidance “to maintain its character and that of the site and setting”.
- The new construction removes the existing open parking lot. NPS Guidance requires “Designing new onsite features (such as parking areas, access ramps, or lighting), when required by a new use, so that they are as unobtrusive as possible” . The existing open parking lot is not consistent with the historic property and enclosed less visible parking, meeting the current City requirements, is provided while landscaped features of the site are retained.
- The new design is differentiated from the old; it is much more simplified in detail while continuing the use of a masonry façade typical of City-based financial institutions buildings. This is consistent with NPS Guidance to “Respect the architectural expression of the historic building type. For example, an addition to an institutional building should maintain the architectural character associated with this building type rather than using details and elements typical of residential or other building types.” The guidance requires that it not look like a house.
- The new construction meets the NPS Guidance that “The materials need not be the same as those in the historic building, but they should be harmonious; they should not be so different that they stand out or detract from the historic building.” The use of wood siding would not be harmonious with the State Street building.
- The large windows on the first level of the new construction are compatible with the monumental windows of the historic Bank building and reflect the institutional business use.
- The proposed building protects the historic setting and context of the historic Bank building “including the degree of open space and building density ... on

4. All quotes are taken from the 2017 Interpretation of the Standards or from the latest edition of Preservation Briefs #14.

5. Examples where buildings clearly much larger and directly connected to historic buildings have recently been allowed by local historic review and the Massachusetts Historical Commission include: Fairhaven High School, Cambridge Public Library and the Salem District Court.

an historic site.” Existing landscaping is maintained, and additional landscaping is provided.

Secondary Review – Impact on Residential Properties

In conformance with 36 CFR 67.6(b)(6), once the proposal is reviewed as to its affects on the subject historic building, the review secondarily includes the district in which it is located. To that end:

- Additional setbacks have been provided on Prospect Street and a landscaped garden is provided at the corner of Prospect and Otis Place allowing additional separation and distance between the commercial use and the residential properties thereby reducing the impact on those homes.
- As suggested by the guidelines, the new construction has been broken up into several smaller sections compatible to the residential construction. The proposed construction is appropriately scaled with respect to the impact on the residential properties.
- The brick color has been varied between sections of the building and distinct roof shapes provided to further define the smaller sections.
- Hipped roofs have been used to lower the overall height of the proposed building, while respecting the pitched roofs and varied roof forms of the residential structures. Hipped roofs are noted on the second block of Prospect Street, along State Street and most of Fruit Street; the original section of the Library and the rear section of the historic bank building also have hip roofs.⁶
- It is typical of Prospect Street to have buildings on both sides of the street, as described in the Streetscape form. Buildings on both sides of the street are typical of the historic district and this new building continues that relationship between existing buildings. This is consistent with guidelines.
- The proposed design provides windows that have a relationship between the spacing and general arrangement of the openings similar to the residential properties.
- The residences on the odd numbered side of Prospect Street, across from the Bank, as well as the directly adjoining building on Otis Place, are closely spaced and their footprints occupy a large proportion of each lot. The new construction does not increase the building density or crowding in the area. This is consistent with the guidelines⁷

⁶See 37 Prospect Street;1,2, 3,7,8,9,10,15,20 Fruit Street; 37,61,88,100,101-3,102,105,114,121,123 State Street.

⁷ The lot size for the Prospect/Otis properties ranges from 0.04 to 0.09 acres; the total of all lots that have been considered the impacted abutters is 0.48 acres or 20,909 square feet. The gross square footage of construction, per the assessor, is 20,755 sf. This represents a FAR (floor are ratio) of 0.99. The bank land total is 0.88 acres and the FAR with the new construction, using the assessor’s gross square footage, is 0.38. The assessor assigns no square footage to basements or parking. If we add all interior parking to the bank’s gross square footage, the FAR is .58. Even with the parking fully counted, the bank’s property will be substantially less dense than the residential properties.

CONCLUSION

In summary, taking all factors into consideration, it is my professional opinion that the Institution for Savings' proposed new construction conforms to the Secretary of the Interior Standards for Rehabilitation.

Respectfully submitted,

Judith E. Selwyn

Dr. Judith E. Selwyn