

Dianne Boisvert

From: cmsmailer@civicplus.com on behalf of Contact form at Newburyport MA
<cmsmailer@civicplus.com>
Sent: February 08, 2020 3:38 PM
To: Katelyn E. Sullivan
Subject: [Ext][Newburyport MA] Institution for Savings addition 2/13/2020 meeting (Sent by Barbara Oswald , pelwald@comcast.net)

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Hello kesullivan,

Barbara Oswald (pelwald@comcast.net) has sent you a message via your contact form (<https://www.cityofnewburyport.com/user/3863/contact>) at Newburyport MA.

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Message:

Dear Mr. Richards, (Chair) and Ms. Sullivan,

I attended the informational meeting at the Newburyport Public Library on 2/5/2019 when the Institution for Savings presented their proposed drawings for a new addition to their historic building at 93 State State Street. This proposed addition clearly overwhelms the historic building built in the late 1800's. The proposed addition is too high, too large, too close to the sidewalk and basically...just too much! Although the addition they constructed in the 1980's did not match the historic building in any way, aside form the use of brick, at least it was hidden behind the original structure. What they are proposing now ,as a second addition, would be very visible from State Street and does not fit into the historic structures on Prospect or Otis Street in any way. It is basically a very large brick box.

Please do not let this DOD go forward in this present state.

Sincerely,

Barbara Oswald
158 State Street
Newburyport, MA 01950



February 10, 2020

Newburyport Historical Commission

BY EMAIL

Re: DOD Advisory Review for 93 State Street

Dear Chairman Richards and members of the Historical Commission,

In your Advisory Review and report to the Planning Board, we hope you will address the 93 State Street application's adherence to the "U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties."

The "Standards for Rehabilitation" say: "New additions, exterior alterations, or related new construction will not destroy...spatial relationships that characterize the property. The new work...will be compatible with the historic...size, scale and proportion, and massing to protect the integrity of the property and its environment." Related guidelines emphasize that additions be subsidiary to the historic building. An addition that is "as large as or larger than the historic building, which visually overwhelms it" is not recommended.

We believe the proposed addition does not meet this standard. We also believe it does not meet the DOD requirement that new construction in the DOD be compatible with the size, scale, height, material and character of the subject historic building and its setting within the DOD (Section XXVII-F-5.a.)

The proposed building is too tall, too long, and too overwhelming for the scale, materials, and progression of the related streetscapes. It is massive, flat, and dull.

The wall on Prospect Street is very disproportionate to both the original building and the existing addition. It is too long and too heavy for the neighborhood, which is made up of mainly lower wood dwellings of a smaller scale. The Otis Place side is totally insensitive to the dwellings right up against it, in scale, material use, and height.

The original building is beautifully proportioned and scaled, and of warm natural materials. It is a prominent feature of the upper State Street area of the Newburyport Historic District, which we believe will be diminished by what is proposed.

Respectfully,

Newburyport Preservation Trust, Inc.

Thomas Kolterjahn, Co-President
64 Federal Street, Newburyport, MA 01950

Linda Miller, Co-President
20 Ship Street, Newburyport, MA 01950



THE SECRETARY
OF THE INTERIOR'S
**STANDARDS FOR
THE TREATMENT
OF HISTORIC
PROPERTIES**

WITH
**GUIDELINES FOR
PRESERVING,
REHABILITATING,
RESTORING &
RECONSTRUCTING
HISTORIC
BUILDINGS**



U.S. Department of the Interior
National Park Service
Technical Preservation Services

New Exterior Additions and Related New Construction

A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for a new or continuing use cannot be successfully met by altering non-significant interior spaces. If the existing building cannot accommodate such requirements in this way, then an exterior addition or, in some instances, separate new construction on a site may be acceptable alternatives.

A new addition must preserve the building's historic character, form, significant materials, and features. It must be compatible with the massing, size, scale, and design of the historic building while differentiated from the historic building. It should also be designed and

constructed so that the essential form and integrity of the historic building would remain if the addition were to be removed in the future. There is no formula or prescription for designing a compatible new addition or related new construction on a site, nor is there generally only one possible design approach that will meet the Standards.

New additions and related new construction that meet the Standards can be any architectural style—traditional, contemporary, or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility to maintain the historic character and the identity of the building being enlarged.

New additions and related new construction that are either identical to the historic building or in extreme contrast to it are not compatible. Placing an addition on the rear or on another secondary elevation helps to ensure that it will be subordinate to the historic building. New construction should be appropriately scaled and located far enough away from the historic building to maintain its character and that of the site and setting. In urban or other built-up areas, new construction that appears as infill within the existing pattern of development can also preserve the historic character of the building, its site, and setting.



STANDARDS FOR REHABILITATION & GUIDELINES
FOR REHABILITATING HISTORIC BUILDINGS

Rehabilitation

Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.



Standards for Rehabilitation

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. 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.
10. 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.

Sustainability

Sustainability should be addressed as part of a **Rehabilitation** project. Good preservation practice is often synonymous with sustainability. Existing energy-efficient features should be retained and repaired. Only sustainability treatments should be considered that will have the least impact on the historic character of the building.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*.

New Exterior Additions and Related New Construction

Rehabilitation is the only treatment that allows expanding a historic building by enlarging it with an addition. However, the **Rehabilitation** guidelines emphasize that new additions should be considered only after it is determined that meeting specific new needs cannot be achieved by altering non-character-defining interior spaces. If the use cannot be accommodated in this way, then an attached exterior addition may be considered. New additions should be designed and constructed so that the character-defining features of the historic building, its site, and setting are not negatively impacted. Generally, a new addition should be subordinate to the historic building. A new addition should be compatible, but differentiated enough so that it is not confused as historic or original to the building. The same guidance applies to new construction so that it does not negatively impact the historic character of the building or its site.

Rehabilitation as a Treatment. *When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed.*

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
New Additions	
Placing functions and services required for a new use (including elevators and stairways) in secondary or non-character-defining interior spaces of the historic building rather than constructing a new addition.	Expanding the size of the historic building by constructing a new addition when requirements for the new use could be met by altering non-character-defining interior spaces.
Constructing a new addition on a secondary or non-character-defining elevation and limiting its size and scale in relationship to the historic building.	Constructing a new addition on or adjacent to a primary elevation of the building which negatively impacts the building's historic character.
Constructing a new addition that results in the least possible loss of historic materials so that character-defining features are not obscured, damaged, or destroyed.	Attaching a new addition in a manner that obscures, damages, or destroys character-defining features of the historic building.
Designing a new addition that is compatible with the historic building.	Designing a new addition that is significantly different and, thus, incompatible with the historic building.
Ensuring that the addition is subordinate and secondary to the historic building and is compatible in massing, scale, materials, relationship of solids to voids, and color.	Constructing a new addition that is as large as or larger than the historic building, which visually overwhelms it (i.e., results in the diminution or loss of its historic character).

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED

NOT RECOMMENDED

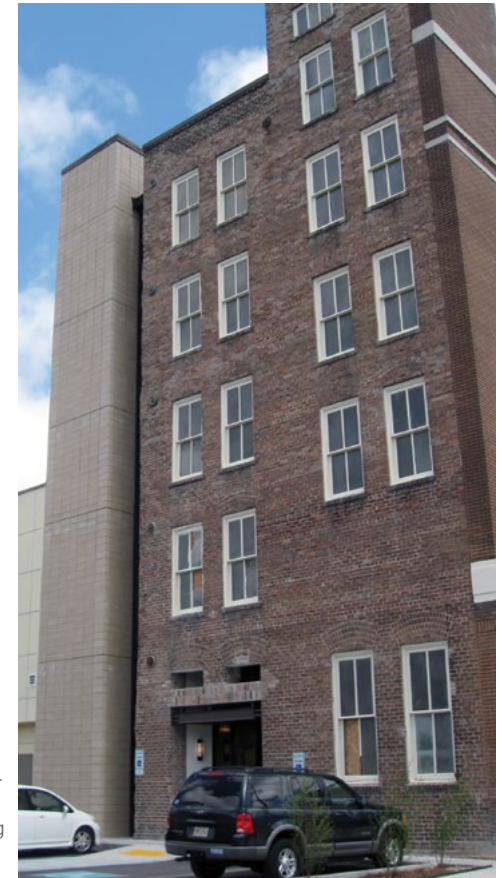
Using the same forms, materials, and color range of the historic building in a manner that does not duplicate it, but distinguishes the addition from the original building.	Duplicating the exact form, material, style, and detailing of the historic building in a new addition so that the new work appears to be historic.
Basing the alignment, rhythm, and size of the window and door openings of the new addition on those of the historic building.	
Incorporating a simple, recessed, small-scale hyphen, or connection, to physically and visually separate the addition from the historic building.	
Distinguishing the addition from the original building by setting it back from the wall plane of the historic building.	

[61 a-b] The materials, design, and location at the back of the historic house are important factors in making this a compatible new addition. Photos: © Maxwell MacKenzie.



NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Ensuring that the addition is stylistically appropriate for the historic building type (e.g., whether it is residential or institutional).	
Considering the design for a new addition in terms of its relationship to the historic building as well as the historic district, neighborhood, and setting.	



[62] The stair tower at the rear of this commercial building is a compatible new addition.

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED

NOT RECOMMENDED

Rooftop Additions

Designing a compatible rooftop addition for a multi-story building, when required for a new use, that is set back at least one full bay from the primary and other highly-visible elevations and that is inconspicuous when viewed from surrounding streets.

Constructing a rooftop addition that is highly visible, which negatively impacts the character of the historic building, its site, setting, or district.

[63] (a) A mockup should be erected to demonstrate the visibility of a proposed rooftop addition and its potential impact on the historic building. Based on review of this mockup (orange marker), it was determined that the rooftop addition would meet the Standards (b). The addition is unobtrusive and blends in with the building behind it.



NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
<p>Limiting a rooftop addition to one story in height to minimize its visibility and its impact on the historic character of the building.</p>	<p>Constructing a highly-visible, multi-story rooftop addition that alters the building's historic character.</p> <p>Constructing a rooftop addition on low-rise, one- to three-story historic buildings that is highly visible, overwhelms the building, and negatively impacts the historic district.</p> <p>Constructing a rooftop addition with amenities (such as a raised pool deck with plantings, HVAC equipment, or screening) that is highly visible and negatively impacts the historic character of the building.</p>



[64] Not Recommended:
It is generally not appropriate to construct a rooftop addition on a low-rise, two- to three-story building such as this, because it negatively affects its historic character.

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED

NOT RECOMMENDED

Related New Construction

Adding a new building to a historic site or property only if the requirements for a new or continuing use cannot be accommodated within the existing structure or structures.

Adding a new building to a historic site or property when the project requirements could be accommodated within the existing structure or structures.

Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.

Placing new construction too close to the historic building so that it negatively impacts the building's character, the site, or setting.

[65] (a) This (far left) is a compatible new outbuilding constructed on the site of a historic plantation house (b). Although traditional in design, it is built of wood to differentiate it from the historic house (which is scored stucco) located at the back of the site so as not to impact the historic house, and minimally visible from the public right-of-way (c).



new addition

NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

RECOMMENDED	NOT RECOMMENDED
Designing new construction on a historic site or in a historic setting that it is compatible but differentiated from the historic building or buildings.	Replicating the features of the historic building when designing a new building, with the result that it may be confused as historic or original to the site or setting.
Considering the design for related new construction in terms of its relationship to the historic building as well as the historic district and setting.	
Ensuring that new construction is secondary to the historic building and does not detract from its significance.	<p>Adding new construction that results in the diminution or loss of the historic character of the building, including its design, materials, location, or setting.</p> <p>Constructing a new building on a historic property or on an adjacent site that is much larger than the historic building.</p> <p>Designing new buildings or groups of buildings to meet a new use that are not compatible in scale or design with the character of the historic building and the site, such as apartments on a historic school property that are too residential in appearance.</p>
Using site features or land formations, such as trees or sloping terrain, to help minimize the new construction and its impact on the historic building and property.	
Designing an addition to a historic building in a densely-built location (such as a downtown commercial district) to appear as a separate building or infill, rather than as an addition. In such a setting, the addition or the infill structure must be compatible with the size and scale of the historic building and surrounding buildings—usually the front elevation of the new building should be in the same plane (i.e., not set back from the historic building). This approach may also provide the opportunity for a larger addition or infill when the façade can be broken up into smaller elements that are consistent with the scale of the historic building and surrounding buildings.	

February 12, 2020

To: Glenn Richards, Chairman of the Newburyport Historic Commission

Re: Comments on the Building Design for the Proposed Addition at the Institute for Savings

Dear Chairman Richards,

As a practicing urban planner with hands-on experience in urban design and historic preservation I offer these comments to the Historic Commission in an effort to encourage further consideration for exploring alternative building designs for the proposed addition at the Institute for Savings Bank in Downtown Newburyport. Although I have not fully reviewed the proposed site plan and architectural elevations for the project, I understand many of the site constraints and opportunities and have reviewed the building renderings posted on-line for the project. Generally speaking, I fully support the expansion and transformation of the surface parking lot into a new built form but I also concur with many of the design-related concerns expressed from abutting property owners and historic preservation organizations. As currently designed, I believe that the proposed building design is likely to have an adverse impact on the surrounding historic setting and character and I believe that alternative design approaches should be explored prior to approval.

Newburyport's National Historic Register District

As you know, the Newburyport's National Register Historic District varies greatly in character, so no single set of design guidelines is likely to fit all districts or neighborhoods within the city. Accordingly, any new building design needs to recognize the historic character that is unique to each neighborhood. Moreover, experience suggests that achieving good design in a historic context is often more the result of a process or dialogue than strict adherence to any specific design guidelines. What's often needed is a process of meaningful collaboration that includes the community, preservation interests, neighbors, and the project architect.

To that end, I believe that most residents and local historic preservation groups seek to preserve and protect Newburyport's historic buildings and their surrounding neighborhood character through contextual building and site design. This is particularly the case in areas of the city designated as within the National Register Historic District and its sub-areas that have a consistent or distinctive physical character or history. Like most infill projects, many residents have expressed a preference for a design that reflects and relates to the context in which the new development is located versus designs whose architectural style and character tries to be distinctly different and in contrast to the historic setting (like the rear addition on the Garrison Hotel). This does not mean to suggest that contemporary design is not supported but rather, that contemporary designs should be carefully developed with serious and well-executed attempts to relate new buildings to their historic context.

The Secretary of the Interior's Standards and the DOD

The Downtown Overlay District (DOD) references the Secretary of the Interior's Standards (Standards) when reviewing new buildings or additions. The Standards are typically used to assess and determine whether the overall effect of the proposed building or addition is consistent with the property's historic character. The amount of change to features and spaces on the property that can be accommodated within the Standards will vary according to the role they play in establishing the character of the property. The Standards use language that suggests that all features and spaces do not carry the same weight in determining the character

of historic properties. Thus, determination that a project meets the Standards is based on the cumulative effect of the proposed work in the context of the existing conditions of the property and the surrounding neighborhood.

Although the Standards encourage that new additions or construction be added in such a way that the new is distinguishable from the historic fabric, my experience and review of outcomes suggests that the level of differentiation should usually be subtle and directed toward informed observers or trained professionals versus the general public. As a rule of thumb, differentiation should not be applied when it would result in an incongruous appearance. From experience, de-emphasizing differentiation and prioritizing compatibility would allow historic buildings in historic districts to grow and change in accordance with their historic patterns and styles, thereby assuring a continuity of character through time. This seems like a prudent and proper manner to protect our historic buildings and settings.

In fairness to the project design team, the design guidelines referenced in the DOD should not be construed to explicitly support the acceptance or rejection of any proposed project solely on the basis of style. New construction within historic settings that improves or strengthens the pre-existing character should be welcomed, regardless of style. The new construction should have consistent typology, composition, scale, proportion, ornament, materials and craftsmanship typical of the surrounding context. Loss of these attributes for the sake of a preference for differentiation inevitably leads to the loss of historic character and thereby, the gradual loss to the historic value of the district.



Proposed New Addition at the Institute for Savings, State Street, Newburyport, MA

The Problem with Differentiation over Compatibility

In review of the submitted renderings, the proposed addition design appears to make some reference to the previous 1980 addition as it consciously avoids any literal resemblance to the historic bank building or working within a particular historic style. This design approach seeks to balance differentiation and compatibility, but with the balance tipped toward the former. This is a very difficult strategy to accomplish because it requires an artistry and skill that are often very difficult to execute; especially, in this case, when the bank's program demands ground-floor parking and a large second floor addition. Like the 1980s addition, this approach is characterized as an abstract referencing of historic architecture with a modernist innovation in which compatibility of the new and old is suggested by the reduction of historic form, details, and character. As a result, the proposed addition appears top-heavy with an oversized cornice, a horizontal (versus vertical) orientation, overly-simplified single-pane window openings, and a glass atrium that resembles the 1980 addition.

The 1980s addition placed an emphasis on differentiation by utilizing a modernist style. Expansion of this prior design to the proposed new addition will likely have an adverse impact on the adjacent existing historic

buildings and the district as a whole as these new modernist additions would be in direct contrast to the local historic patterns and typologies of this neighborhood. Unfortunately, when consistently applied over time, this design approach leads to the gradual erosion of Newburyport's historic character that many of us are seeking to protect and enhance.

The Advantage of Compatibility over Differentiation

While not attempting to replicate the original design of the historic bank building on State Street, I would suggest that the design team consider the compatibility of the building design over differentiation as it stands a better chance of sustaining the character of the surrounding historic neighborhood. New building elements should be in the same of closely-related style, sustaining a sense of overall continuity in architectural language. The intention is to achieve balance between differentiation and compatibility, but weighed in favor of the latter. This strategy has a long history. In fact, this approach is what most architects and builders have always done for centuries.

Summary and Next Steps

In the end, compatibility in building design requires more than similarities of massing or abstract references. It should be a primary objective of building designers and an integral part of the design process for any project located within a historic setting. What makes buildings from different eras and styles compatible is that they share the same underlying principles of space, structure, elements, composition, proportion, ornamentation and character. If these principles are consistent among the buildings along a street they will be compatible and thereby successful. What's more, if we pay more attention to the historic context than to the individual buildings and move beyond an often obsessive concern with the chronology of construction, our choice of design approach can fulfill our collective obligation to make the city more beautiful, sustainable, and equitable. We need to seek less of the architecture of our time and more of the architecture of our place.

In closing, as you review this building design I would like to reiterate that I fully support the bank's expansion into this surface parking lot – itself incongruent with the surrounding context - provided the building and site design are consistent with a design approach that is based on the principles of compatibility over differentiation. Hopefully the Commission, the NPT, the neighbors, and the leadership at the Institute for Savings and their design team can engage in a meaningful dialogue to explore alternatives to the current building design. Alternatives that will strengthen and enhance the district through replacement of the unsightliness of the non-contributing parking lot with a building and street edge that will endure and stand the test of time. To that end, alternatives to ground-floor parking should also be explored as there are a wide array of automated parking systems that might offer opportunities for underground parking at the site.

I thank you in advance for consideration of these comments and appreciate your efforts to protect and enhance the city's historic resources.

Respectfully,

Nicholas Cracknell, AICP
13 Pickard Street, Amesbury, MA

Exhibit 1

Regardless of how the Commission falls on the compatibility-differentiation scale, I would suggest the Commission ask itself the following questions when evaluating the proposed design. Perhaps the answers will indicate that further study and exploration would benefit the proposed bank expansion.

- History – Does the proposed design appropriately incorporate or respond to any existing historic resources or would it adversely effect such resources?
- Continuity – Would the proposed development maintain or strengthen the existing street edge or would it create an interruption to the pattern of the built environment?
- Height – Would the height and form of the building have a positive relationship with the street and adjacent or nearby buildings?
- Massing – Would the massing of the building be an appropriate response to the context? Would the height and width of the building be appropriately subdivided into component parts?
- Style - Does the architectural style relate to the existing context or create a meaningful juxtaposition?
- Composition – Does the design of the façade form a sophisticated composition of component parts?
- Materials – Would the building material be attractive and appropriate to the surrounding context?
- Openings – Would the scale of entrances be appropriate to the neighborhood context? Would the scale and proportion of the window openings and their articulation form a positive relationship with the architectural character of the surrounding buildings?
- Roof – Has the roof edge been design to express the termination of the building in an attractive, balanced or meaningful manner?

If the Commission shares a preference for compatibility over differentiation within the DOD I would suggest the following guidelines be considered for further review of this application:

- General - New buildings should be compatible with the size, scale, color, material and character of the property and the surrounding neighborhood. New buildings may be designed in a variety of architectural styles provided the design reflects the sense of place of the specific district and creates a continuity of character.
- Height - The building height should be generally consistent with the surrounding buildings and should not exceed the height or cornice lines of their neighbors by a significant amount.
- Massing – Buildings should relate to the massing of the height and character of the adjacent buildings. The base or podium should relate to the scale of other buildings and the design of towers should include elements that reduce the overall scale and impact of the size of the building.
- Street Wall – New buildings should maintain the relationship to the street and property lines of the neighborhood.
- Continuity of Wall Surfaces – New buildings should maintain the continuity of the wall surface and texture of the buildings along the street with window and door openings appearing to be cut into the wall surface.
- Façade Composition - Buildings should have a tripartite façade with a base, middle and a top. There should be a vertical orientation to the façade. The top edge should be defined by a well-proportioned cornice detail. Window and door openings should have a pattern consistent with the historic building and surrounding context with particular emphasis on the ground-floor pedestrian experience. Blank, inactive or opaque facades should be avoided. The cornice, windows and doors should be generally aligned with the adjacent buildings. Garage doors and entryways should be avoided on the street-facing facades.
- Rhythm – New buildings should incorporate architectural elements that divide the façade into intervals that maintain a pedestrian-friendly scale. Windows and doors should be placed in a manner that is harmonious with the established rhythm of the context.
- Materials and Details – New buildings should use materials similar to those in the surrounding context; including color. Materials should be used in a manner that creates details, incorporates textures or small-scale elements that give buildings a three-dimensional character and a human scale at the ground level.