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City of Newburyport
Planning Board
60 Pleasant Street, P.O. Box 550 Newburyport, MA 01950
ATTN: Andy Port, Planning Director

Dear Chairman Sontag and Members of the Board:

On behalf of my client, the Institution for Savings (IFS), I am pleased to provide the following comments in response to the Downtown Overlay District (DOD) Supplemental Report of the City of Newburyport Historical Commission (NHC). Dated 28 January 2021, that document is the fourth issued over the past year by the NHC relating to IFS's planned addition at 93 State Street in Newburyport's central business district. The addition is proposed along the Prospect Street and Otis Place frontages of the IFS parcel, immediately to the rear of an existing, circa-1980 addition rather than directly to the historic, circa-1870 brick and brownstone bank building.

As a trained architectural historian and preservation planner with a long career in regulatory design review, including more than two decades with the Boston Landmarks Commission (*c.v. attached*), I appreciate and respect the NHC's mandate. I certainly admire its interest in promoting the historic visual character of Newburyport. Unfortunately, however, its report demonstrates not only a faulty understanding of both the DOD guidelines and the Secretary of the Interior's Standards but also insufficient attention to the National Park Service (NPS) guidelines intended to aid in their interpretation.

In the 28 January report's Executive Summary, the NHC acknowledges that the most recent project iteration reflects "significant and laudable efforts to reduce the impression of size, scale and/or massing." It also acknowledges the challenge of introducing an architecturally appropriate addition to a commercial building within an otherwise residential context. Nevertheless, the NHC finds that the addition is excessive both in its height and footprint and that its commercial architectural expression is discordant with its setting. For those reasons, NHC concludes—erroneously, in my view—that the proposed design does not conform to the Secretary of the Interior's Standards.

While the Standards themselves are admittedly broad, running to little more than a single page of text, the NPS has also promulgated extensive supplementary criteria. The most recent NPS treatment guidelines document, issued in 2017, runs to more than 250 pages. Expanding upon the Standards themselves by offering examples of potentially appropriate and inappropriate treatments, these guidelines are intended to promote the sound interpretation of the Standards by local regulatory entities.

Despite the ready availability of this material, however, the NHC report demonstrates little cognizance of the guidelines; indeed in many instances, it disregards them altogether. This failure reflects a glaring oversight for as you are aware, the DOD ordinance (XXVI-F -3.a) requires compliance with “*any relevant provisions of the United States Secretary of the Interior’s Standards as they may be amended from time to time, including all related guidelines, bulletins and other official guidance promulgated by the National Park Service* [emphasis added].”

Thus, the NHC’s contention that the eave height is excessive is both misleading and mistaken. Specifically, although the cornice line of the original building’s central pavilion (its most volumetrically prominent feature) is 30 feet, 8 inches, the NHC cites the 22 ft., 10 in. cornice height of the flanking wings as a more significant metric. Terming this the “perceived eave height,” the report equates that dimension with the dominant, 23 ft., 5 in. cornice line of the adjacent Prospect Street houses and the dominant 21 ft., 5 in. cornice line of those along Otis Place.

The NHC’s citation of a “perceived” height significantly lower than that of the actual building is whimsical in itself, and is not supported by either the Standards or the supplementary guidelines. This contrivance is compounded by the NHC’s disregard of the fact that the 33 ft., 4 in. ridge height of the addition would be lower than those of the adjacent houses, which range from 35 to 40 feet above grade.

NHC’s concern about the apparent height of the addition’s ground floor, which is not reflected by the regularity of its fenestration, is similarly misplaced. Necessitated by municipal parking requirements that the NHC acknowledges and that IFS is obliged to follow, the inclusion of a parking level will have no discernible visual impact on the building’s exterior appearance.

While the eave heights of the adjacent buildings of Prospect Street and Otis Place may give an impression of some regularity, the dominant eave height of the context is not uniform. In fact, the NHC acknowledges that the height differential between the addition and its adjacent buildings is a matter of mere inches. As such, adherence to an arbitrary consistent height is unnecessary. Given the addition’s location opposite the Prospect Street and Otis Place houses, its setbacks from those streets and its placement to the rear of a freestanding object building, any dimensional discrepancy will be so readily absorbed by the context as to prove imperceptible.

Moreover, the receding planes of the current iteration’s traditional, slate-clad hip roof will serve to reduce the addition’s apparent height still further. Similarly, the roof’s geometrically neutral hipped configuration will relate well to the flat roof expression the bank’s front-facing central pavilion and the gabled roofs of the adjacent houses. By replicating neither form, the hip roof (which is itself a familiar and historic form, abundantly present within the DOD) will appear neutral and subordinate to both while at the same time responsive to the larger context.

The NHC believes that the proposed design does not adhere to the Standards due to incompatibility with the neighborhood context and insufficient “subordination” to both the historic building and its settings. In

making this observation, the NHC notes the DOD ordinance stating that “[n]ew construction within the DOD shall not disrupt the essential form and integrity of the subject historic building...structure, the lot where it is located, or its setting within the DOD. New construction shall be compatible with the size, scale, height, color, material and character of the subject historic building...lot where it is located, and its setting within the DOD.”

These are odd criteria by which to find the design inappropriate; the addition does not disrupt the essential form and integrity of the historic building, because it is not attached directly to it and is hence inherently reversible. As stated within the DOD criteria, “***New additions and other alterations to an historic building, structure or exterior architectural feature shall be designed so that if they were to be removed or reversed in the future, the essential form and integrity of the original historic building or structure would be unimpaired*** [emphasis added].”

Furthermore, the addition is to stand at the extreme rear of the parcel, at a considerable distance from the original building from which it is separated by an earlier addition. Moreover, the red brick and slate-clad hip-roofed exterior design is compatible with the size, scale, height, color, material and character (in this case, commercial) of the historic building.

In observing that the introduction of an addition suitable to both the bank and the neighborhood is inherently challenging, NHC fails to note that the IFS building and the adjacent houses have co-existed alongside each other throughout their existence. Thus, the proximity of the bank, a distinguished work of 19th-century commercial architecture, and its vernacular residential neighbors of the same period is itself a historic condition. Thus, the proposed addition does not represent an intrusion within the context but rather, the continuity of a historic circumstance.

Further, the NHC’s suggestion that the addition is inappropriate because its footprint exceeds that of the original building is under-informed. Many buildings outgrow their original functional capacity, requiring volumetric expansions in order to remain useful. (The Massachusetts State House in Boston and the U. S. Capitol in Washington, D.C., are but two well-known examples of distinguished historic buildings whose aesthetically sympathetic additions now far exceed their original envelopes.)

To this point, National Park Service (NPS) guidelines state that “[d]epending 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. In some cases,” the guidelines continue, “***separating the addition from the historic building with a small hyphen can reduce the impact of an addition that is larger than the historic building*** [emphasis added].” Thus, the offset position of the proposed addition, immediately to the rear not of the original bank volume itself but rather, to that of an earlier, circa-1980 addition is entirely consistent with that direction. The distance of the addition from the historic building’s primary State Street elevation will further ensure its subordinate visual role.

Also, the NHC opines that the most recent redesign’s brick expression is out of keeping with its context. This assertion is also inconsistent with NPS guidance, which states in part, “*the materials used in the addition need not be the same as those on the historic building however new materials that highly*

contrast with the historic building should be avoided.” Hence, the clapboard-sided exterior of the previous iteration, for which the NHC now expresses a preference, would not be appropriate but rather, highly problematic. While an acceptable addition to the bank need not be brick, the introduction of clapboard (a material wholly out of character with the historic building) is plainly inappropriate.

NPS guidelines go on to affirm that a “*new addition should also 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* [emphasis added].” By this standard then, the wood siding and gabled roof of the second design are utterly incongruous for an addition to a historic, flat-roofed bank of masonry construction. Any attempt to quote from the forms and materials of the adjacent residential buildings may be well intentioned but is an inherently ill-suited and false to a commercial purpose.

Similarly, while the relationship of an addition to a building within a historic district should consider its context, NPS guidelines clearly state, “*All aspects of a rehabilitation project, including a new addition, will be reviewed first as they affect the historic building and second as they affect the historic district in which they are located* [emphasis added]. Ultimately then, the primary aesthetic obligation of any addition must not be to reflect the character of unrelated contextual conditions but rather, that of the original building itself.

While praiseworthy in itself, the NHC’s commitment to the historic visual character of Newburyport would be far more valuable if it demonstrated a familiarity with the interpretive criteria provided by the NPS. These are promulgated for the very purpose of applying the Secretary of the Interior’s Standards in an appropriately informed and judicious manner.

The IFS addition project is, as the NHC notes, inherently challenging. Not only must the proposed addition complement the historic masonry bank building, it must also respecting the surrounding residential neighborhood of nineteenth-century single- and two-family frame houses. Attempting to resolve the inevitable dissimilarity between adjacent commercial and residential building types, materials and forms is necessarily a sensitive and subjective enterprise. This effort is compounded by other regulatory requirements, relating to parking, accessibility and other issues unforeseen at the time of the bank’s original construction or even when the previous addition was constructed 40 years ago.

Ultimately, however, although the contextual considerations may be numerous, a harmonious result is nonetheless achievable if the Secretary of the Interior’s Standards are properly understood. As review of the supplementary interpretive criteria contained within the NPS guidelines clearly demonstrates, the IFS addition meets these Standards. Indeed, it exemplifies them. Therefore, in my opinion, the project merits the approval of the City of Newburyport Planning Board.

Very truly,

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Skills and Experience

Seasoned historic preservation professional with an extensive background in regulatory planning, architectural design review, community development, historic rehabilitation tax credits, policy innovation and implementation

Analyzing and articulating the significance of historic buildings and identifying successful strategies for their appropriate redevelopment

Managing multiple projects, ensuring that each remains on budget and on schedule and that public meeting/record requirements are followed.

Expediting project review by interacting with public agencies, community groups and other stakeholders, advocating preferred development objectives and building consensus for their effective realization

Enhancing project outcome through design consultation and technical assistance to property owners, developers, merchants and architects regarding regulatory process, criteria and best practices

Delivering spoken and written commentary to guide regulatory officials in their review of projects

Fielding public comment and providing official information/presentations to individuals, community groups and media outlets

Employment History

Independent Historic Development Consultant
2019-present

Epsilon Associates
Maynard, Massachusetts
Senior Consultant
2015-2019

City of Boston Landmarks Commission, Environment Department
2015 Director of Design Review
2013-2015 Assistant Director for Historic Districts
1997-2013 Senior Preservation Planner
1995-1997 Preservation Planner
1991-1995 Historic District Administrator

Town of Georgetown, Massachusetts
1990 Author, Historic Resource Survey

Town of Amesbury, Massachusetts
1989 Co-author, Historic Resource Survey

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Education

Attingham [U.K.] Summer School for the Study of the English Country House and its Collections
[Royal Oak Scholar]

Boston University, Boston, Massachusetts
Master's Program in Historic Preservation Studies, Dept. of American & New England Studies

Boston College, Chestnut Hill, Massachusetts
M. A., B. A., English (Phi Beta Kappa, magna cum laude)

Universite Laval, Quebec City, Quebec, Canada
Certificat, Programme d'ete en francais pour non-francophones

Honors

National Juror for Commercial Projects, Palladio Awards, Traditional Building Magazine, 2019

Paul & Niki Tsongas Preservation Award, Preservation Massachusetts, 2018

Fay Rotenberg Public Service Award, Newbury Street League, 2015

Heavy Lifting Award, Back Bay Association, 2010

Mary Natale Citizenship Award, Neighborhood Association of the Back Bay, 2009

Excellence in Service Award, Back Bay Association, 1998

Recent Public Presentations and Lectures

"Newbury Street and the Seven Lamps of Architecture," walking tour, Boston Art Week, May 2018

"Time and Materials: Newbury Street as a Work of Art," walking tour, Boston Art Week, May 2017

"Divine Interventions: Back Bay Churches," walking tour, City of Boston Preservation Month, 2015

"Recent Back Bay Buildings," walking tour, City of Boston Preservation Month, 2015

"The Architecture of Park Square," walking tour, City of Boston Preservation Month, 2015

"Boylston Street: the Abstract and the Concrete," walking tour, City of Boston Preservation Month, 2015

"When Charlesgate Was in Flower," walking tour, City of Boston Preservation Month, 2014

"A Green Colonnade: The Commonwealth Avenue Mall," walking tour, City of Boston Preservation Month, 2014

"Back Bay Decades, 1860-1900," walking tour series, Neighborhood Association of the Back Bay, 2013-2014

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“Access and Success in the Back Bay,” walking tour, City of Boston Preservation Month, 2013

“The Back Bay Work of Arthur Little,” lecture, Bayridge Residence Ayer Lecture Series, 2012

Selected Publications and Media Appearances

Contributor [54 entries], *Buildings of Massachusetts: Metropolitan Boston, Charlottesville*: University of Virginia Press for the Society of Architectural Historians, 2009

On-air interview, “Extraordinary Homes of Commonwealth Avenue,” *Dream Drives*, HGTV

Professional & Civic Activities

2018	Institute of Classical Architecture and Art, New England Chapter: Member of the Board
2005-2010	Institute of Classical Architecture and Art, New England Chapter, Vice President
1998-2001	Codman Square Main Street, Design Committee (Chair, 1999-2001)
1997-2001	Codman Square House Tour, chair, Site Selection Committee, guidebook author

Technical Photography, Microsoft Office Suite

References will be furnished upon request