

Dianne Boisvert

Subject: FW: [Ext]FW: forwarding transcript of NHC remarks at the request of a member of the public
Attachments: Peknik NHC remarks from June 25 meeting.docx
Importance: High

From: Patricia Peknik <ppeknik@berklee.edu>
Sent: Monday, June 29, 2020 1:47 PM
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Subject: forwarding transcript of NHC remarks at the request of a member of the public

Dear Chair Bonnie Sontag,

At the request of a member of the public, I am forwarding my remarks from the NHC meeting of June 25, and architect Joe Morgan's calculations as presented during the Commission's discussion of the revised Institution for Savings plans. Mr. Morgan's comments are indented.

Best,

Patricia

Scale and Subordination

A strong tenet in all *Department of Interior* guidance is the concept that an addition needs to be subordinate to the historic building. ('New Exterior Additions to Historic Buildings: Preservation Concerns,' Preservation Brief 14, U.S. Department of the Interior)

According to NHC member Joe Morgan, in its volume and height, the proposed addition makes the historic bank building subordinate to *it*, as illustrated by the following calculations of relative above-grade volume:

"The 1871 building footprint is 3,642 GSF. Most of the building is only about 24 feet high, but steps to about 35 at the center ridge line. We averaged it at 30 feet high for the sake of this calculation. At 3,642 GSF x 30 ft. high, the historic structure is 109, 260 cubic feet above grade.

The numbers provided by the applicant on June 8 show an addition of a total of two floors of building area with a GSF of 16,102 GSF. As an approximation, we split that GSF between two floors, since it wasn't broken down by floor. There's a 2nd floor overhang above the emergency generator, so that might in some tiny way affect net square feet, but that means the footprint of the proposed addition is 8,051 GSF.

Building volume is 8,051 x 30 feet nominal height, so 241,530 cubic feet. If we were to use the real average height of the original building, instead of averaging it at 30, we might find that the mass of the addition is close three times the original. But even using that 30 foot average height, the proposed addition is over twice the volume-above-grade of the 1871 building.

Were we to include the 1980 addition in the calculations of the ratio of historic building to additions, then clearly the non-historic additions to the building will be three times the volume of the historic structure."

The Secretary's Standards call for the comparison to be made between the historic structure and the proposed new additions, and not between the historic structure, along with its non-historic recent additions, and the proposed new structure. Otherwise, new additions could be added incrementally and then figure into the calculation of the historic structure's "size," whereas the intent of the Standards is to protect historic structures, not their non-historic new additions. Therefore, for the purposes of calculating above-grade volume of the historic structure against above-grade volume of the proposed addition, we did not consider the 1980 addition to be a protected historic addition.

Coordination with the Neighborhood Context

Inherent in preservation theory, and explicit in all official Department of Interior guidance and each of the bulletins and technical publications, is the requirement that a new addition on an historic building be compatible with the scale, massing and design of the subject building, and also harmonious with the context buildings surrounding its site:

Standard 1 of the *Secretary of the Interior's Standards for Rehabilitation* references the building's "site and environment"; Standard 9 refers to the "historic integrity of...the environment."

The Department of the Interior's guidance on "*New Additions to Mid-size Historic Buildings*" likewise refers to "the historic setting," advising that "additions to historic buildings must be evaluated not only by how they affect the building itself, but by how they affect the district in which the building is located." ('Planning Successful Rehabilitation Projects, New Additions to Historic Buildings,' National Park Service, U.S. Department of the Interior)

Reading broadly across all National Park Service briefs on preservation and rehabilitation, we find that the Department of the Interior continually emphasizes the need to "protect the historic setting and context of a property"; states that "the historic relationship between buildings must be protected"; and explains that "The Standards also encompass the building's site and environment," and "other surrounding historic buildings in the district."

The *Standards*, therefore, are not just about the individual historic building as subject to alteration through new construction. They are about that subject building, but they also speak to, as the Department of the Interior explains: “the sense of time and place, feeling and association, the historic setting and context.”

The design, therefore, has to be coordinated with the setting, and respond to the neighborhood context by making the Otis and Prospect Street facades compatible with the residential character of those streets; the 1894 Sanborn Fire Insurance map illustrates the extent to which 93 State Street was historically embedded within a lot surrounded by wood-framed dwellings:

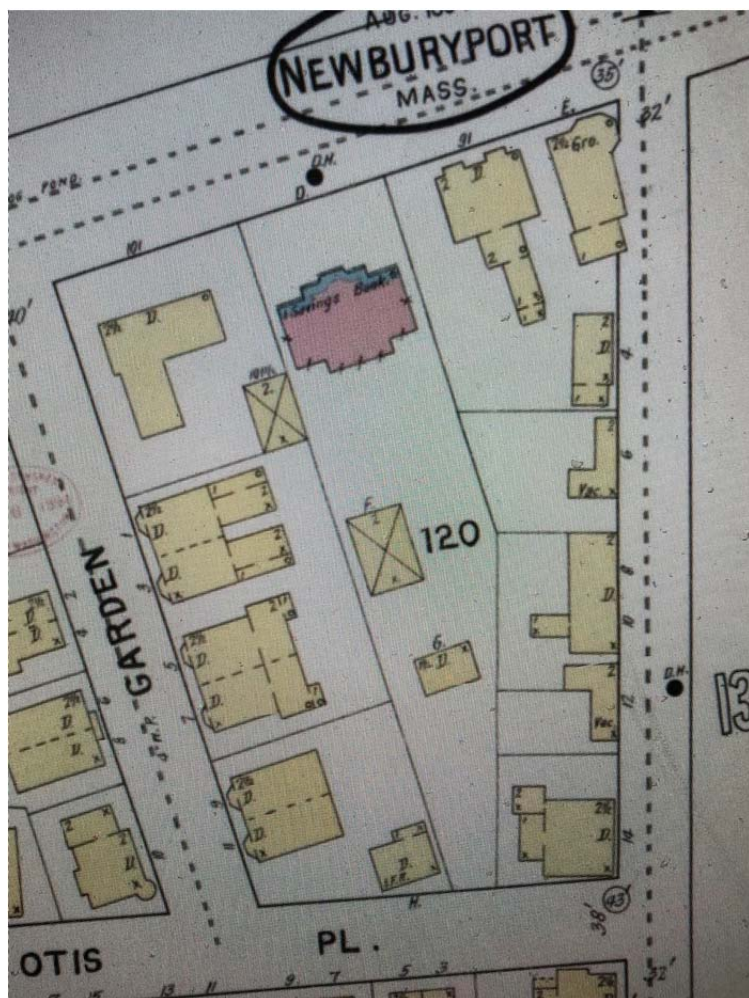


Image 12 of Sanborn Fire Insurance Map of Newburyport, Essex County, Massachusetts

From an historic preservation perspective, of course the ideal solution would be to restore the historic land use pattern and build two smaller buildings on the lot, with some green space between them, rather than a suburban-scaled office complex. That would be the highest-level preservation response in an historic district. But a single building of a lesser volume can comport with the *Secretary's Standards* and the DOD ordinance if its design engages with its neighbors; the NHC has the responsibility to encourage development that is sympathetic to the context buildings and setting, and that will preserve “the sense of time, place, and community” that is expressed by the coherent architectural aesthetic of downtown.

The surrounding streetscape has its own Form G that describes the historic houses on Prospect Street, including the 18th-century houses at 9 and 18-20; part of this neighborhood is in the R-3 district, including Otis Place and half of the first block of Prospect Street.

The applicant presents photos (p. 25 of the presentation) of the way houses and mill buildings coexist outside the DOD in other parts of the city, i.e. houses were built on the empty lots around the James Steam Mill on Charles and Salem in the DCOD. But this is the DOD. The photo taken in the DOD behind the Tracey Mansion indeed illustrates the way such massive new construction can convert neighboring streets into mere alleys: the houses along Hales Court were torn down, and a parking lot built, so the view from State down Prince Place is hardly persuasive evidence of how large-scale new construction in the dense DOD can avoid disrupting the context.

The tall, rectangular vertical window openings and aluminum-clad windows are incompatible with the context buildings on Otis and Prospect. Fenestration should be sensitive to the neighborhood in scale and materials. The height and rhythm of the windows on the State Street-facing elevation should be coherent with those on the 1871 building, and, along Prospect and Otis Streets, coherent with the height and rhythm of the windows of the residential buildings.

Preservation guidelines emphasize the total impression new construction will make in the neighborhood setting and in the historic district setting. Windows are a critical element in that total impression.

The Secretary's Standards are unexceptionable: they call for conforming to and preserving the “character” and “scale” of the existing neighborhood context buildings.

Designing a subordinate and compatible addition, on an historic building, in an historic district, is so challenging, that the Secretary's first piece of advice in the guidelines for “New Exterior Additions to Historic Buildings” is to consider whether it is even possible to do so at all; but we do welcome an addition that will be responsive to its context and not subvert the character of the neighborhood setting.

The Department of the Interior brief on building additions to historic structures in densely-built neighborhoods states that it's important to design an addition that will have “the least impact on the historic building and the district...” There is not a no-effect option, but the current proposal is a high-impact plan.

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Looking at how other Massachusetts cities with preservation ordinances have approached such new construction projects, we see that our Newburyport standards for neighborhood compatibility aren't even as high.

The standard in some other cities is that the addition “should make a real contribution to the setting,” so that the historic district is better off. That's not our standard: We just want to do no harm, or minimize impact.

The *National Alliance of Preservation Commissions Standards and Criteria* warn strongly against the potential for additions and new construction to “disrupt the essential form and integrity...of the historic district.” We, however, did not even consider the entire historic district, but only the DOD, and asked whether this particular addition as proposed comports with the *Standards* and DOD ordinance. It does not.

To quote the historical architect in the Office of Historic Preservation at the National Park Service, Steven Semes: “To the degree that the existing

neighborhood context has a positive, consistent, and valued character, and to the degree that the proposed design would substantially alter that character, the proposed design must bear the burden of proof for demonstrating that the benefits to the neighborhood context and to the city as a whole will outweigh the residual unavoidable harm that would be done harm to the sense of place. The location of the burden of proof is upon the architects who propose the change.”

Applying the *Standards* and DOD ordinance to this plan as new construction to an historic building in an historic neighborhood in an historic district, the recommendation has to be for less height, less overall volume, improvements to fenestration, and proper contextualization of the addition along Prospect and Otis streets. All of those things could ease the assimilation of the addition into the context.