



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

December 29, 2023

Sharon Sharry
Jones Library, Inc.
43 Amity Street
Amherst, MA 01002

RE: Massachusetts Historic Rehabilitation Tax Credit Application,
Jones Library, 43 Amity Street, Amherst, MA; MHC# HRC.1250

Dear Ms. Sharry:

The Massachusetts Historical Commission (MHC) has reviewed your application for the Massachusetts Rehabilitation Tax Credit for the above referenced property.

Regrettably, the MHC is unable to assign second certification (830 CMR 68.38R.1(4)(b)) and allocate credit to your project (830 CMR 63.38R.1(3)(c)) at this time because the proposed project does not meet the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (830 CMR 63.38R.1(5)(b)and(f)) as presented. Specifically, the proposal violates Standards 2, 5, 6, 9, and 10.

Standard 2 states the following:

- "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."

Standard 5 states the following:

- "Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved."

Standard 6 states the following:

- "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."

Standard 9 states the following:

- "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."

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Standard 10 states the following:

- “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.”

The historic structures report, submitted to MHC under separate cover, provides information on the design and existing historic materials that still exist. The historic 1928 library is composed of three parts- the “formal” center portion, flanked on the east and west sides by smaller wings, with an ell running forth off the east wing. “The east elevation is the secondary façade of the building and is evocative of the rambling ells found on early dwelling houses of the area, spaces that originally house kitchens, wood sheds, carriage, and so on...” The historic structures report also states that the historic 1928 building remains fairly intact and “much of the interior finishes (surfaces, flooring, ceilings, cornices), along with nearly all of the millwork (stairs, doors, mantels, wainscoting and paneling, building-in cabinetry), have been retained and are in very good condition considering their age.” The natural wood finishes are of Philippine mahogany. The 1993 addition expanded the library but made only minor alterations to the original historic building.

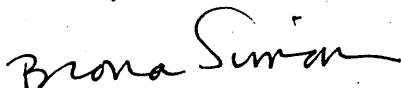
The proposed project includes the demolition of portions of the original 1928 historic building and the 1993 addition. A significant portion of the west façade, the north façade and east façade on the Children’s wing (west wing) will be demolished to accommodate the new addition. The north elevation of the 1928 building ell will be completely covered with the proposed new addition. The new addition will also be visible from the south elevation, which is the front façade. The project as proposed does not meet the Standards (Standards 2, 9, 10)

The Buckingham slate on the highly visible gambrel roof is proposed to be replaced with a synthetic slate, even though the historic structures report states that Buckingham slate is still quarried and available as a roofing material. The removal of historic slate roof, which is highly visible and a character-defining feature of the building, and replacement with a synthetic slate does not meet the Standards (Standards 2 and 6).

The applications proposes that two sets of historic wood stairs in the original 1928 building are proposed to be removed changing the circulation of the historic 1928 building. Additionally, other floor plan modifications will be made, causing the removal and loss of historic fabric. The reconfiguration of the historic 1928 building circulation patterns and the removal and loss of historic fabric does not meet the Standards (Standards 2 and 5).

We encourage you to reapply in the next application cycle if the project can be redesigned to meet the Secretary of the Interiors Standards for Rehabilitation. Please note that the MHC will require the following updated information to supplement your application: newly completed application form cover pages for Part 1 and Part 2, updated letters of support, an updated estimated project budget which includes a new pro forma detailing overall project costs and qualified rehabilitation expenditures, and any additional information with which the existing application may be supplemented. Please be as detailed as possible in your application about the above referenced items. The next application deadline is January 16, 2024.

Sincerely,



Brona Simon
Executive Director
State Historic Preservation Officer
Massachusetts Historical Commission

xc: Erin Doherty, Epsilon Associates