



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

April 26, 2024

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.”

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 MHC has reviewed your response to our comments, received on February 9, 2024. Some responses directly state that the portions of the proposed project scope are based on response to Massachusetts Board of Library Commissioners (MBLC) requirements. Additionally, the response stated that the project had been reviewed and approved by the Amherst Historical Commission under the terms of a preservation restriction. Finally, the response makes mention of where certain portions of the proposed new construction will be visible from public ways, including Amity Street.

The MHC is reviewing the proposed Jones Library expansion project under the Massachusetts Historic Rehabilitation Tax Credit program (830 CMR 63.38R.1) and must determine if the proposed project is... “consistent with the standards established by the Secretary of the United States Department of the Interior for rehabilitation of historic properties.” This review extends to the entire interior of a building, and entire exterior of a building, including all facades and site work, regardless whether it is visible from a public right-of-way.

As stated before, 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, carriages, 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 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.

Guidance regarding the Secretary of the Interior Standards for the Rehabilitation of Historic Properties provided by the National Park Service is detailed below:

“In accordance with Standard 9, a new addition must preserve the historic building’s form/envelope, significant materials and features; must be compatible with the historic building’s massing, size, scale, and architectural features; and must be differentiated from the historic building to preserve its character. Standard 10 calls for new additions to be constructed in such a manner that the essential form and integrity of the historic property be

unimpaired if the new work were to be removed in the future. Limiting the the removal of historic materials and utilizing existing doors or enlarging windows to transition to the new addition may accomplish this.”

“The size, scale, and massing of a new addition all pertain to the addition’s overall volume and three-dimensional qualities. Taken together, size, scale and massing are critical elements for ensuring that a new addition is subordinate to the historic building, thus preserving the historic character of a historic property. Typically, a compatible addition should be smaller than the historic building in both height and footprint. However, there are other considerations that may allow moving away from this basic concept.”

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. In some cases, 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. Another way of minimizing the impact of a new addition to an historic building is to offset it or step it back from the mass of the historic building.

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).

The MHC does not assign second certification because the project is violation of the Secretary of the Interior’s Standards for Rehabilitation. Additionally, it is the opinion of MHC staff that the proposed project, as presented, does not meet the Criteria as outlined in 830 CMR 63.38R.1.

Sincerely,



Brona Simon
Executive Director
State Historic Preservation Officer
Massachusetts Historical Commission

xc: Erin Doherty, Epsilon Associates