



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

November 1, 2024

Robert Peirent  
Amherst Special Capital Projects Coordinator  
Town of Amherst  
4 Boltwood Avenue  
Amherst, MA 01002

RE: Jones Library Renovation and Expansion, 43 Amity Street, Amherst, MA; MHC# RC.60731

Dear Ms. Peirent:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the information that was received at this office on August 23, 2024, October 1, 2024, and October 2, 2024, for the project referenced above. The staff of the MHC have the following comments.

The letter received at this office on August 23, 2024 from the Town of Amherst invited the MHC to be consulting party in the Section 106 process and goes on to state, "If the Massachusetts Historical Commission chooses to be a consulting party to the Section 106 process, please notify me in writing within 30 days of receipt of the letter."

The MHC is the office of the State Historic Preservation Officer. As you know may know, the State Historic Preservation Officer (SHPO) does not need to "opt-in" to be a consulting party in the Section 106 process (36 CFR 800.2(c)(1)).

The information provided to the MHC, hand delivered by Sharon Sharry, on October 2, 2024 includes a letter from the Town of Amherst that identifies the proposed project, identification of consulting parties, identification of the Area of Potential Effects (APE), and a determination of effect.

The October 2, 2024 letter states, "The Town has defined the undertaking's APE as the Project site and immediate surrounding properties within approximately 300 feet from which there may be views of the Project. The APE boundary is defined to include properties on the west side of North Prospect Street, the south side of Amity Street, the east side of North Pleasant Street, and runs along the south side of Cowles Lane." The MHC concurs with the APE.

The October 2, 2024 submission states, "The Town has determined that the Project will have an "adverse effect" on historic properties through the physical destruction of part of the Jones Library, alterations to the interior circulation and historic materials, and construction of a rear addition, and changes to the visual setting of the Amherst Central Business Historic District and the Strong House (36 CFR 800.5(a)(2)(i), (ii), (iv), and (v))."

The MHC concurs with the "adverse effect" finding for the proposed destruction and alteration of significant historic architectural features of the Jones Library and proposed replacements that are not consistent with the Secretary of the Interior's Standards for Rehabilitation; and the introduction of a new

addition which will diminish the setting of the historic Library and the Amherst Central Business Historic District (36 CFR 800.5(a)(2)(i), (ii), (iv), and (v)).

The October 2, 2024 submission also states, "A Consulting Parties Meeting, which the public is invited to attend and will have an opportunity to comment, will be held October 9, 2024." An email was sent from Robert Peirent to Elizabeth Sherva at MHC on October 1, 2024, informing her of the hard copy submission to be delivered on to MHC on October 2, 2024. This email stated, "As noted on the last page of this letter, a Consulting Parties Meeting will be held on October 9, 2024. Additional information regarding this meeting will be provided to all Consulting Parties in the next day or two." The MHC was never notified of the time or place of the Consulting Parties meeting, and therefore could not attend.

The MHC looks forward to consulting with the Town of Amherst, as the responsible agent for HUD, and the National Endowment for the Humanities to explore alternatives that would eliminate or minimize the adverse effect of the proposed project. An alternatives analysis should be provided to the MHC and the consulting parties for review. At a minimum, the alternatives study should include an alternatives analysis of the following topics: roof materials, staircases and circulation, woodwork, and the size, scale, and massing of the proposed addition.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
Massachusetts Historical Commission

xc: Sharon Sherry, Jones Library, Inc.  
Ann Piesen, National Endowment for the Humanities (NEH)  
Martha Curran, HUD  
Rachael Mangum, ACHP  
Maxwell Sickler, ACHP  
Massachusetts Board of Library Commissioners  
Amherst Historical Commission  
Amherst Historic Preservation Coalition