

# BOSTON PRESERVATION ALLIANCE

February 21, 2020

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## Executive Director

Gregory J. Galer, Ph.D.

Brona Simon, Executive Director  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston MA 02125

Re: Charles F. Hurley Building PNF

Dear Ms. Simon:

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 142 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character.

I write today in regard to the January 24, 2020 Project Notification filing by the Mass. Division of Department of Capital Asset Management Maintenance (DCAMM) regarding the Charles F. Hurley Building within the Boston Government Services Center (BGSC). The history, significance, and condition of this National Register eligible mid-century complex is well represented in the filing, although we differ with some of the conclusions of the filing, which I will detail below. As noted in the PNF as well its appendix material including the MHC Survey Form and the "fiche" documentation from the modernist preservation organization DOCOMOMO, the architectural significance of the BGSC is well established. We appreciate DCAMM's recognition of such in this filing as well as in our previous engagement with DCAMM (and MHC and the Boston Landmarks Commission) on safety upgrades to the Hurley Building completed last year. Through that lengthy process we built a positive, collaborative relationship that we hope will continue in this much larger project. With that goal we were pleased to join other preservation leaders in a presentation, conversation, and site tour before this PNF was filed.

The Alliance agrees with a variety of basic assumptions and establishing descriptions within the PNF. However we disagree with the disparate weight the report places on the significance of the Lindemann Mental Health Center building while diminishing the importance of the of the Hurley Building itself as an integral component of Rudolph's master plan and his principles for the entirety of the BGSC. The full extent of Rudolph's role in the Hurley Building's development appears to be somewhat in dispute, with the Rudolph Foundation claiming evidence of a more active role than that outlined in the PNF. Regardless, undisputed is the fact that the entire complex is a reflection of Rudolph's master plan vision and guidelines, well-described in the

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filing. The narrative builds a case for significant adverse impacts to Hurley from the outset, minimizing its significance and focusing on the building's flaws and the negative impact on the entire composition from the lack of construction of Rudolph's tower. The report recommendations read as a pre-determined conclusion from the outset.

Furthermore, it's disappointing that the filing, while placing praise upon the significance of the Lindemann as "the site's primary historic resource" and that "the Lindemann Center's character-defining features are largely intact," the PNF largely uses Lindemann as a foil to justify demolition of portions, or all of, the Hurley. Yet the PNF nowhere matches the admitted importance of Lindemann with any sort of commitment to restoration, repair or in any other way undoing the damage done to this remarkable piece of architecture through disinvestment by the Commonwealth. Although the report honestly acknowledges that state of disrepair, e.g. deterioration of concrete, changes to circulation patterns, a plaza "deteriorated nearly beyond recognition" and that cars park "without regard for adjacent architecture or interior uses." The report notes this to be "the most significant and powerful remaining expression of Rudolph's design intent" yet nowhere do we see commitment to remedy the situation.

While all the options presented spare the Lindemann itself from the partial or complete demolition of Hurley, several would alter character-defining features such as the monumental stair landing. Whatever sort of redevelopment proposal moves forward to facilitate reinvestment in this complex, we would insist that restoration of the Hurley and adjustments to use (such as removal of the parking on the plaza on Merrimac Street) be necessary requirements of mitigation.

Some aspects of the Design Guidelines outlined in page 43 of the Preservation Report (Attachment A) present a good starting point for discussion of any future use and potential alterations to the BGSC. The commitment to follow *the Secretary of the Interior's Standards for Rehabilitation* (#1) and to keeping with Rudolph's original design intent (#3), for example, represent thoughtful preservation practice. The reference to the Constantino Nivola murals (#14) is an important gesture, although an insufficient commitment to maintain this artwork on site. Past experiences have demonstrated that once large artworks such as this are removed from their original site, relocation and any return to public display is highly unlikely, despite all the best intentions. A commitment to continued public display of these murals, preferably in their current location is needed.

While other elements of the Guidelines represent appropriate ways to frame the fact that modifications and changes to Brutalist buildings such as these are necessary, the assumptions of drastic changes and loss ("significant demolition," "radically reconfigured," "removal of sections of Hurley," etc.) are premature.

We certainly recognize that buildings such as these have their flaws and that changes are in order. However, issues such as poor climate control, inefficient glazing, minor spalling, and some level of concrete degradation are all addressable (as has been demonstrated by other sites of this vintage with great success.) These are issues that individually or in aggregate are insufficient to justify significant or wholesale demolition. Alternatives to the rather dramatic options presented are omitted from the analysis. None presented explore a more full commitment to the entirety of Hurley, even with potential significant changes. None explore a change in use that may be more suitable to the existing building, such as conversion of Hurley to a residential program in consort with new construction somewhere on site to generate additional usable FAR and revenue required by DCAMM.

As near-neighbors to the BGSC we regularly engage with the building and have been pleased with the positive change in building use since fall protection and other life safety upgrades were made. Public use has visibly increased with this one intervention, a good example of what turning the tide of disinvestment could do for the entirety of the complex with more creative thinking that embraces a larger portion of the Hurley building.

While we would agree that the “most significant loss of integrity is the incomplete realization of Rudolph’s design” because the HEW tower was never built, we feel that dismissal of a more serious attempt at preservation and adaptation of the Hurley building without such significant adverse effects as proposed is a failure of the options presented. For example, the courtyard is criticized as underutilized yet it is also recognized as “establishing the sense of spatial enclosure Rudolph desired.” A quiet, enclosed space isolated from the noise and disruptions of traffic is rare in the city’s downtown core and should be embraced and cherished, and the focus should be on attracting people to it. While we would agree that the Hurley appears “uninviting and even inaccessible from the courtyard” we believe more restrained interventions could solve this and other problems highlighted. The growing public engagement and activity at Boston City Hall demonstrates the potential. Like the state, the city had long-neglected the building and plaza, but with a change of attitude and investment the new public interest has been remarkable and continues to benefit the community.

The Alliance embraces the DCAMM’s desire to remedy long-standing problems on this site and the opportunity to reimagine the site through modifications and sympathetic new construction. However, we refuse to reward disinvestment which has led to deterioration and exacerbation of that fundamental design challenge (and to a public perception that focuses on the challenges rather than the opportunity) by supporting demolition on site without additional justification. If we had been convinced by such arguments with Boston City Hall we very well could have lost that world-renowned building.

We look forward to continued collaborative work with DCAMM toward a more positive outcome at Hurley, embracing some change and evolution without the drastic options

proposed. Additional information is clearly in order to better understand why other alternatives may not be viable as well as how new construction and the existing building will interface in ways that enhance the function and public engagement with Rudolph's designs. We insist that any plans include robust investment in the repair and restoration of the Lindemann Mental Health Center.

Sincerely,



Greg Galer  
Executive Director

Cc:

Carol Meeker, DCAMM  
Abigail Vladeck, DCAMM  
Rosanne Foley, Boston Landmarks Commission  
Doug Kelleher, Epsilon  
Drew Leff, Stantec  
Henry Moss, Bruner/Cott  
Gary Wolf, DOCOMOMO New England  
Kelvin Dickinson, Paul Rudolph Heritage Foundation  
Mark Pasnik, OverUnder, Wentworth Institute