



## The Commonwealth of Massachusetts

February 25, 2020

William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

Carol Meeker  
Deputy General Counsel  
Division of Capital Asset Management and Maintenance  
One Ashburton Place, 15<sup>th</sup> Floor  
Boston, MA 02108

RE: Long Term Ground Lease of Hurley Building, Government Service Center Complex,  
19 Staniford Street, Boston (Downtown), MA; MHC# RC.56843

Dear Ms. Meeker:

The Massachusetts Historical Commission (MHC) is in receipt of a Project Notification Form (PNF) filed by Epsilon Associates on behalf of the Division of Capital Asset Management and Maintenance (DCAMM) for the Long Term Ground Lease of the Hurley Building, received at this office on January 27, 2020. The staff of the MHC have reviewed the information submitted and have the following comments.

DCAMM proposes to solicit redevelopment proposals and subsequently enter into a long-term ground lease for the redevelopment of a parcel of land at the Boston Government Service Center. The ground lease parcel includes approximately 3.25 acres of land containing the Charles F. Hurley Building at 19 Staniford Street. As proposed, the entire Hurley Building site will be ground-leased to a redevelopment partner who will lead the planning, permitting, financing, and construction for the site.

It has been MHC staff opinion for many years that the Boston Government Service Center, including the Lindemann Center, Hurley Building, and site features, meets the criteria of eligibility for listing in the State and National Registers of Historic Places under criteria C at the local, state, and national levels of significance for its extraordinary Modern Architecture and its association with master architect Paul Rudolph.

Highly respected architect Paul Rudolph was appointed the coordinating architect for the entire site, creating a single master plan and produced design guidelines for all three buildings along with public spaces. Rudolph designed the Garage Plaza and landscaping and also oversaw the design of the buildings. When the original architects for the HEW tower were dismissed, Rudolph then redesigned the tower. While the final tower component of the Government Service Center Complex was never realized, many important and significant features of the complex are retained today, including the Hurley Building, Lindemann Center, and associated site features.

The PNF outlines four site development alternatives for the Hurley Building site. The Preservation Report by Bruner/Cott Architects (January 2020), included as an Appendix to the PNF, provides additional information on these four site development alternatives. The report states, "These alternatives are not meant to be an exhaustive study of all of the ways that the site may be redeveloped but instead are meant as radically different scenarios that allow the testing of potential outcomes for a broad range of approaches." However, these four alternatives are quite prescriptive for demolition of the Hurley Building in whole or in part and do not explore other possible alternatives that would lead to substantial preservation of this historic building and site.

Specifically, the Site Development Alternatives do not consider (a) retention and rehabilitation of the Hurley Building, potentially leveraged by federal and/ or state historic rehabilitation tax credits, or (b) retention and rehabilitation of the Hurley Building with new construction.

220 Morrissey Boulevard, Boston, Massachusetts 02125  
(617) 727-8470 • Fax: (617) 727-5128  
[www.sec.state.ma.us/mhc](http://www.sec.state.ma.us/mhc)

The MHC requests a copy of the draft Request for Proposal (RFP) for review and comment. MHC requests that the RFP include additional options: (1) retention and rehabilitation of the Hurley Building; and (2) retention and rehabilitation of the Hurley Building with new construction, which should precede the options listed within the PNF (Options A – D) in importance. The RFP should promote retention of the Hurley Building and should consider impacts to the entire Government Services Center site.

The MHC recognizes the challenges of retrofitting aging buildings to meet current standards and code. Thousands of buildings in the Commonwealth have managed to accommodate modern services while retaining vast amounts of architecturally significant spaces and materials, proving that rehabilitation of historic buildings is a viable option.

The MHC also recognizes pedestrian challenges to the site. Different access points and passageway openings could be developed to promote cross site access and inviting public spaces.

After review of our files and the information submitted, MHC has determined that the proposed project will have an "adverse effect" ((950 CMR 71.05(a)), (950 CMR 71.05(e)), and (950 CMR 71.07(2)(b)(3))) on the Government Service Center through transfer or sale of the historic property without adequate conditions or restrictions regarding preservation, maintenance or use of the property; and the destruction of the Hurley Building.

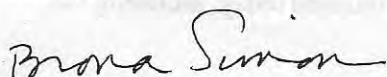
Pursuant to 950 CMR 71.07(3), the MHC looks forward to consulting with Massachusetts Division of Capital Asset Management and Maintenance (DCAMM) to seek ways to avoid, minimize, or mitigate the adverse effect of the proposed demolition. The MHC hereby initiates its consultation process.

The demolition of a significant historic property that is included in MHC's Inventory triggers the filing of an Environmental Notification Form (ENF). If demolition of an inventoried historic property is the only anticipated ENF threshold, the proponent may consult with the MHC and change the project to result in a "no adverse effect" determination, or, as a result of consultation, seek to enter into a Memorandum of Agreement with the MHC in lieu of filing an ENF (301 CMR 11.03(10)).

The MHC is concerned with the long term planning for the Government Service Center Complex. MHC staff participated in the life safety improvement projects at the Government Service Center, which took much time, effort, and state funds to implement. It is disheartening to have completed the project only to have DCAMM consider demolition of the architecturally significant features that the life safety improvement project took great care to preserve. The MHC is also concerned with the conditions of the Lindemann Center. The Preservation Report by Bruner/Cott Architects submitted with this PNF highlights the deteriorated concrete surfaces on the grand external stair and throughout the Merrimac Street plaza.

These comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00) and MEPA (301 CMR 11). 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: Doug Kelleher, Epsilon Associates, Inc.  
Rosanne Foley, BLC  
Gary Wolf, DOCOMOMO/US\_NE  
Greg Galer, BPA  
Kelvin Dickinson, Paul Rudolph Heritage Foundation  
Mark Pasnik, OverUnder