

SOUTH MARKET BUILDING

BOSTON LANDMARKS COMMISSION STUDY REPORT



Petition # 178.94
Boston Landmarks Commission
Environment Department
City of Boston

Report on the Potential Designation of

South Market Building
100-199 Faneuil Hall Marketplace, Boston, Massachusetts

As a Landmark under Chapter 772 of the Acts of 1975, as amended

Approved by:

Rosanne Foley, Executive Director

Date

Approved by:

Lynn Smiledge, Chair

Date

Draft report posted on September 7, 2021

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INTRODUCTION

The designation of the South Market Building was initiated in 1994 after a petition was submitted by registered voters to the Boston Landmarks Commission asking that the Commission designate the property under the provisions of Chapter 772 of the Acts of 1975, as amended. The purpose of such a designation is to recognize and protect a physical feature or improvement which in whole or part has historical, cultural, social, architectural, or aesthetic significance.

Summary

Designed by Alexander Parris in consultation with Asher Benjamin, South Market (1825-1826, BOS.1713, NHL, NRDIS) is the southernmost range of stores in a complex of three detached granite blocks with Faneuil Hall Market (currently known as Quincy Market) at the center and North Market on the north. In the late 1820s, some Bostonians began to describe the three blocks collectively as “Quincy’s Market” and later “Quincy Market,” though in contemporary usage, the term Quincy Market tends to be reserved for the central Faneuil Hall Market building.¹ The complex constitutes one of the most impressive and large-scaled market complexes built in the United States during the first half of the 19th century. The blocks are significant as early examples of the Greek Revival style and monumental granite construction in Boston, encompassing Boston’s first substantial civic improvement project following its incorporation as a city in 1822, and for their association with influential early 19th century architects. Recognition of South Market’s historic and architectural significance, and its importance to the three-block complex, accelerated during the urban renewal era of the 1960s and early 1970s, when local, regional, and national organizations mobilized to ensure preservation of the complex in a restoration and adaptive reuse project completed to national acclaim. After some ambiguity in the 1966 National Historic Landmark designation, which implied that all three commercial blocks were so designated, the landmark boundary was formally defined in 1970 to confirm South Market and North Market were integral components of the complex with the central market building.² South Market retains integrity of location, setting, design, materials, workmanship, feeling, and association.

This study report contains Standards and Criteria which have been prepared to guide future physical changes to the property in order to protect its integrity and character.

¹ The three buildings occupy a single Clinton Street parcel with no street number, per current assessors’ records. Faneuil Hall Market (Quincy Market) was designated a Boston Landmark in 1996. For an account of how Faneuil Hall Market came to be known as Quincy Market, see *Report on the Potential Designation of Quincy Market as a Landmark under Chapter 772 of the Acts of 1975, as Amended*, Boston Landmarks Commission (Boston, 1996), 23.

² Per the National Historic Landmark/National Register addendum prepared for Quincy Market by Charles W. Snell (June 29, 1970), “[t]he Quincy Market ... was designated a National Historic Landmark in Theme XVII-b “Commerce and Industry,” by press release dated November 13, 1966. The description of the site is hereby enlarged to include within the designation the two flanking buildings.” See also National Park Service, U. S. Department of the Interior, “Fifty-Seven Sites Recommended for Historic Landmark Status by Parks Advisory Board,” Press release (November 13, 1966), 5, which refers to market buildings. Both documents accessed September 2020 at https://catalog.archives.gov/OpaAPI/media/63793849/content/electronic-records/rg-079/NPS_MA/66000784_NHL.pdf.

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1.0 LOCATION

1.1 Address

According to the City of Boston's Assessing Department, the South Market Building is located at Clinton Street, Boston, Mass., 02109; its address was identified in the original petition to the Boston Landmarks Commission as 100-199 Faneuil Hall Marketplace. The parcel on which it stands contains multiple buildings, foremost of which are Quincy Market (known historically as Faneuil Hall Market) and the multi-building blocks known as North Market and South Market. Only South Market is under consideration for landmark designation in this study report.

1.2 Assessor's Parcel Number

The Assessor's Parcel Number is 0303670000.

1.3 Area in which Property is Located

Located in the Government Center area of downtown Boston, South Market is the southernmost block in a three-block composition east of Faneuil Hall known collectively as "Quincy's Market" from the late 1820s and Faneuil Hall Marketplace since 1976. The complex comprises the Quincy Market National Register District. This three-part complex encompasses a central market building, originally known as Faneuil Hall Market and now Quincy Market, flanked by parallel rows of store and warehouse buildings on the north (North Market) and south (South Market). South Market is bounded by Clinton Street on the north, Chatham Street on the south, and on the east and west by pedestrianized sections of Commercial Street and Merchants Row, respectively. Historically, the plaza on the north side of South Market was a vehicular thoroughfare known as South Market Street.

1.4 Map Showing Location

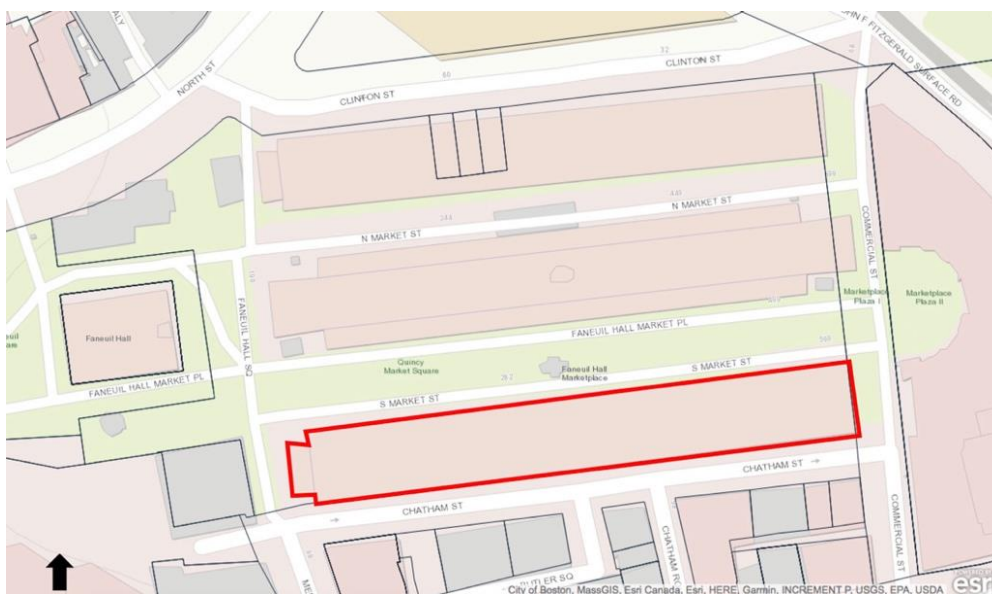


Figure 1. Map showing the location of the South Market within parcel 0303670000.

2.0 DESCRIPTION

2.1 Type and Use

Since it was completed in 1826, South Market has been in continuous commercial use. The multi-building block was originally occupied by wholesale and retail storefronts on the ground floor and warehouse storage and small offices on the upper floors. It presently has retail stores and restaurants on the ground floor and offices on the upper floors. It is located in the Markets Protection Area zoning district.

2.2 Physical Description of the Resource

South Market occupies a generally flat site on filled land located at what was originally the Town Dock. Measuring 530 feet long and 65 feet wide, the rectangular block rises four full stories above grade to a side gable roof, which contains an additional two stories in the attic (Figure 2). The block contains 22 structurally-distinct building units, typically with four window bays (Figure 6). A center unit with five window bays (Figure 7) is flanked by 11 four-bay buildings on the east and 10 four-bay buildings on the west. In addition, the first and third building units from each end are slightly wider than the other units with four openings. The window openings also vary slightly in width; the outer bays in each structural unit are typically slightly narrower than the middle two window openings.

The center building unit has, on its first floor, an open, vaulted passageway connecting South Market Street with Chatham Street (Figure 8). The bay in which this passageway is situated forms the exact center of the South Market. Three entrances to the upper story offices also run front-to-back through the block, featuring recessed, glass and metal entrances. Windows typically contain modern, one-light, pivoting sash; they originally displayed multi-pane sash.

The entire façade (north elevation) and the first floors of the side and back walls are constructed of granite from the Chelmsford area. The façade is distinguished by post-and-lintel construction on all floors, including granite storefronts on the ground floor, semi-circular arched windows at the second floor, and rectangular windows on the third and fourth floors (Figures 3 - 6). A granite cornice punctuated by terra cotta corbels at the party walls lines the eave on the facade (Figure 9). On the unpretentious side and back elevations, trabeated granite storefronts occupy nearly all of the ground floor, while the walls above are constructed of brick. Fenestration on the side and back walls consists of rectangular window openings trimmed with sandstone at their rectangular sills and flared lintels (Figure 17). Tie rods with star-shaped face plates are prevalent on the brick elevations; they occur singly on the end walls and in pairs at the location of the party walls on the rear elevation. Brick dentil courses line the eave on the back (south) elevation (Figure 18).

The entire roof is clad with slate shingles, interrupted by brick party walls rising above the roofline to a raised parapet with a chimney positioned at the ridgeline. A slate-clad, hip-roofed dormer is centered in each building unit on both roof slopes (Figures 3, 4, 6). Galvanized steel gutters and downspouts drain the roof slopes.

Historically framed with granite posts and lintels, the first-floor storefronts are complemented by granite block at all four building corners and in panel sections at the center of the side elevations. On the façade (north elevation), the trabeated arched windows on the second floor are set within granite block walls, while strictly post-and-lintel construction reappears on the third and fourth floors to frame their rectangular windows (Figure 6).

The gable end elevations (Figures 2 and 12) are virtually identical. At the ground level, trabeated granite storefronts at the outer bays are separated by a center panel of granite block; all four building corners are rounded and feature chamfered tops (Figures 13 and 14). On the west elevation, a modern metal and glass greenhouse structure covers all but the outermost bays of the first floor (Figure 2). The second through fourth floors have six windows each, arranged with a single window at the outer bays and two sets of loosely paired windows in the middle. The fifth story of both side elevations has two pairs of windows centered about the midpoint of the wall, and the attic story has two small, quarter-circle windows centered about the midpoint.

While most of the South Market's storefronts retain granite post and lintel construction, the framing elements of numerous storefronts have been altered over time. Ornamental cast iron piers replace granite posts at four storefronts on the façade and two on the rear elevation (Figure 10). More boldly, two building units near the center of the façade display two-story high, metal storefronts with a pointed arch spanning the entire width of the unit. A more intact example, at 4 South Market Street, has a channeled frame and a decorative, circular metal plaque above the peak of the arch (Figure 11). Two subterranean storefronts have been added to the façade, accessed by granite stairways with metal railings.

The design and materials of storefront infill vary throughout the South Market. Modern metal and glass fenestration occurs at several storefronts on the façade. Many storefront openings on the back (south) elevation of the block have been infilled with wood, a few with brick. All of the existing storefront fenestration appears to be modern (1976 and later).

2.3 Contemporary Images



Figure 2. Façade (north) and west elevations, looking southeast.



Figure 3. Façade (north) elevation: Mid-section of block.



Figure 4. Façade (north elevation): East end of block, looking southeast.



Figure 5. Façade (north elevation): East end of block, looking southwest.



Figure 6. Façade (north elevation): Typical four-bay building unit.



Figure 7. Façade (north elevation): Five-bay unit in center of block (includes Entrance 2 to upper levels of the block).

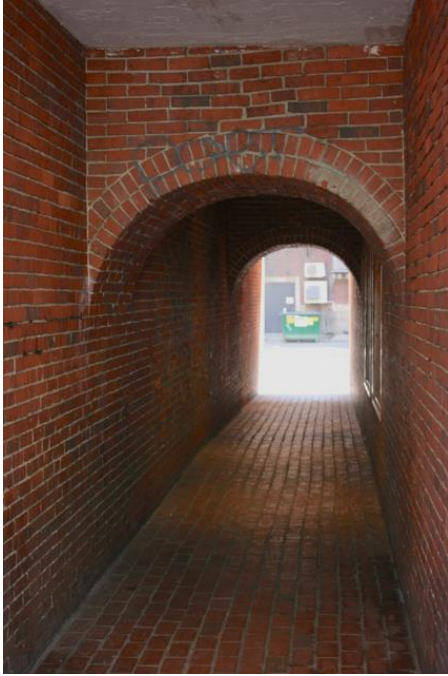


Figure 8. Open passageway from South Market Street to Chatham Street in center building unit, looking south.



Figure 9. Façade (north elevation): Detail of roof edge.



Figure 10. Façade (north elevation): Detail of storefront with cast iron piers.



Figure 11. Façade (north elevation): Detail of storefront with two-story arched frame.



Figure 12. East elevation.



Figure 13. East elevation: Detail of first floor.



Figure 14. Back (south) elevation: East end of block with typical granite storefront.



Figure 15. Back (south) elevation: Mid-section and west end of block.



Figure 16. Back (south) elevation, looking east.



Figure 17. Back (south) elevation: Typical building unit with atypical cast iron pilasters at storefront.



Figure 18. Back (south) elevation: Detail of windows and roof edge.

2.4 Historic Maps and Images



Historic Image 1. View west toward Faneuil Hall of South Market (left), Faneuil Hall Market (center), and North Market (right), 1827. Note proximity of waterfront. Courtesy of Boston Public Library.



Historic Image 2. South Market Street, ca. 1855-1899 (likely closer to 1855-1860 because rooftop additions are not yet present). View west toward Faneuil Hall, showing South Market (left), Faneuil Hall (center), and Faneuil Hall Market (right). Courtesy of Boston Public Library.



Historic Image 3. South Market Street, ca. 1915-1925. View east from Merchants Row, showing Faneuil Hall Market at left, and fifth and sixth-story additions on South Market buildings at right, with Custom House behind. Image source: Historic New England.



Historic Image 4. South Market undergoing rehabilitation, 1975. View east.
Courtesy of U.S. Department of the Interior, National Park Service.

3.0 SIGNIFICANCE

Designed by Alexander Parris in consultation with Asher Benjamin, South Market (1825-1826, BOS.1713, NHL, NRDIS) is the southernmost range of stores in a complex of three detached granite blocks with Faneuil Hall Market (currently known as Quincy Market) at the center and North Market on the north. In the late 1820s, some Bostonians began to describe the three blocks collectively as “Quincy’s Market” and later “Quincy Market,” though in contemporary usage, the term Quincy Market tends to be reserved for the central Faneuil Hall Market building.³ The complex constitutes one of the most impressive and large-scaled market complexes built in the United States during the first half of the 19th century. The blocks are significant as early examples of the Greek Revival style and monumental granite construction in Boston, encompassing Boston’s first substantial civic improvement project following its incorporation as a city in 1822, and for their association with influential early 19th century architects. Recognition of South Market’s historic and architectural significance, and its importance to the three-block complex, accelerated during the urban renewal era of the 1960s and early 1970s, when local, regional, and national organizations mobilized to ensure preservation of the complex in a restoration and adaptive reuse project completed to national acclaim. After some ambiguity in the 1966 National Historic Landmark designation, which implied that all three commercial blocks were so designated, the landmark boundary was formally defined in 1970 to confirm South Market and North Market were integral components of the complex with the central market building.⁴ South Market retains integrity of location, setting, design, materials, workmanship, feeling, and association.

3.1 Historic Significance

Josiah Quincy (1772-1864), mayor of the newly incorporated City of Boston from 1823 to 1828, was most influential in devising a solution to Boston’s inadequate market facilities, then centered at Faneuil Hall, Dock Square (1742/1761/1805-1806, BOS.1712; NHL, NRIND/DIS, LL). Mayor Quincy undertook a major city planning effort, proposing construction of a new market house immediately east of Faneuil Hall, on a site to be created by filling in and building over the Town Dock and adjacent wharves extending south to Long Wharf.⁵ At a public meeting held January 13, 1824, the proposal was approved despite some opposition, and shortly thereafter endorsed by the General Court. The Mayor and City Council retained Boston architect Alexander Parris to develop the plan

³ The three buildings occupy a single Clinton Street parcel with no street number, per current assessors’ records. Faneuil Hall Market (Quincy Market) was designated a Boston Landmark in 1996. For an account of how Faneuil Hall Market came to be known as Quincy Market, see *Report on the Potential Designation of Quincy Market as a Landmark under Chapter 772 of the Acts of 1975, as Amended*, Boston Landmarks Commission (Boston, 1996), 23.

⁴ Per the National Historic Landmark/National Register addendum prepared for Quincy Market by Charles W. Snell (June 29, 1970), “[t]he Quincy Market ... was designated a National Historic Landmark in Theme XVII-b “Commerce and Industry,” by press release dated November 13, 1966. The description of the site is hereby enlarged to include within the designation the two flanking buildings.” See also National Park Service, U. S. Department of the Interior, “Fifty-Seven Sites Recommended for Historic Landmark Status by Parks Advisory Board,” Press release (November 13, 1966), 5, which refers to market buildings. Both documents accessed September 2020 at https://catalog.archives.gov/OpaAPI/media/63793849/content/electronic-records/rg-079/NPS_MA/66000784_NHL.pdf.

⁵ Subsequent land-making in the 1950s, prior to construction of the elevated John F. Fitzgerald Expressway (1951-1954, demolished), extended the harbor line to its present position, about three blocks east of Quincy Market.

further. While Mayor Quincy envisioned a market house comparable to the New Market (1804–1811) in Philadelphia, with a long roof on brick columns, Parris designed a much grander and more radical scheme, proposing construction of a long, central two-story market house built of granite, flanked on the north and south by equally long, 4½-story ranges of store and warehouse buildings, constructed of granite and brick.

Construction began April 27, 1825 with the laying of the Faneuil Hall Market cornerstone. The City of Boston built Faneuil Hall Market, but the South Market and its companion, North Market, were developed under private ownership with city-imposed deed restrictions that dictated the design specifications, ensuring integration of design for the entire complex and yielding an outstanding early example of city planning.

The completed three-part complex officially opened August 26, 1826, offering an extensive selection of food products; within a short time, it became the food distribution center for Boston – population then about 55,000 – and most of New England. The entire improvement project, including land-making, creation of six new streets, and expenditure of more than \$1.1 million, was accomplished without any special taxes or debt on the part of the city. Following the opening of the granite buildings, the mid-18th century Faneuil Hall on the west was discontinued for market purposes, and used as city offices and a public meeting hall. A covered walkway built in the 1840s and removed by 1855 briefly connected an upper story of Faneuil Hall with the upper story of the Faneuil Hall Market.⁶

South Market Development (1825–1826)

To build the block of attached buildings known as South Market, the City of Boston sold twenty-two building lots on South Market Street at auction in April 1825, for a total cost of \$403,853, or an average of approximately \$11.92 per square foot. Boston importers, ship owners, and manufacturers with substantial financial resources were among the far-sighted individuals who purchased lots. At South Market, purchasers included Israel Thorndike, whose success in the East India and China trade led him to relocate in 1810 from Beverly to Boston, where he maintained extensive real estate holdings; Robert Gould Shaw, one of the early Boston millionaires whose wealth grew from successes in maritime trade, finance, and real estate; and Samuel Train and Enoch Train, whose small fleet of East Boston-built clipper ships traded with South American and Cuban ports. William Phillips, a merchant, shipping investor, and former Lieutenant Governor of the Commonwealth (1812–1823), was involved in establishment of the Massachusetts Bank in 1784 and served as bank president in 1825. John Bellows, who purchased a South Market lot after acquiring a lot in the North Market range, was head of Bellows, Cordes and James, importers of British dry goods, and the president of the Manufacturers and Mechanics Bank. While most purchasers acquired one or two building lots, John D. Williams, a Washington Street wine merchant and director of both the New England Bank and the Union Insurance Company, purchased five lots at South Market.

⁶ Philip Bergen, *Old Boston in Early Photographs, 1850–1918, 174 Prints from the Collection of The Bostonian Society* (New York, NY: The Bostonian Society and Dover Publications, Inc., 1990), 23.

Deeds to the twenty-two building lots detailed the conditions of development and sale.⁷ Building lots were somewhat larger than those at North Market, ranging in width from 22 feet 6 inches to 28 feet, with a uniform depth of 65 feet. Front and rear walls of each store or warehouse were to be constructed within sixty days of lot purchase and the buildings to be ready for occupancy by July 1, 1826, one year after those at North Market. Each store or warehouse was to be constructed “of brick and stone, four stories high, which shall cover the whole of said lot, with a cellar under the same and a slated roof” as well as brick party walls twelve inches thick. The facade (north elevation) was to be of “hammered granite of uniform colour ... on a line with the front of the adjoining stores ... [and] in all respects in strict conformity with the plan and elevation of the stores or warehouses drawn by Alexander Parris, and exhibited at the sale of said lots.”⁸ Buyers of South Market lots were also required, as soon as they built cellar walls, to “effectually box out the sea water from the said lot of land” or the Mayor and Aldermen would authorize the proprietor of any other lot to accomplish the task at the expense of the negligent owner.

Constructed of Chelmsford-area granite, the trabeated structural system of monolithic granite piers and lintels employed in the market buildings is the oldest of its kind extant in Boston. Earlier warehouse and market buildings were timber-framed or constructed of brick. The trabeated stone facade “became the new fabric of the city, superseding Bulfinch’s brick; this predominance of granite endured throughout the 19th century.”⁹

Since the South Market and North Market ranges were privately owned and constructed, occupancy began as individual buildings were completed, ahead of the official opening of the three-part complex in August 1826.

When individual stores opened to the public, most warehouse merchants sold dry goods. A sampling included feather merchants, candle makers and lamp oil vendors, brass and copper dealers, tanners and sellers of leather goods, tobacconists, cobblers, vendors of curiosities, and sellers of West Indies goods. There were also pewter shops, upholstery and clothing stores, and fashionable boot and shoe shops.¹⁰

Buildings in each range typically housed wholesale and retail sales activity on the ground floor, with warehouse storage and offices above.

⁷ See for example City of Boston to David Rice, Suffolk County Registry of Deeds, 300:270 (April 1, 1825). By contrast, North Market (developed first) was more irregular in layout, encompassing twenty-five building lots ranging in width from 21 feet 6 inches to 25 feet, and in depth from 50 feet 11½ inches to 57 feet. Deed transactions for South Market and North Market sales are itemized with an accompanying graphic of building lots in Elizabeth Reed Amadon, Abbott Lowell Cummings, Christopher P. Monkhouse, and Roger S. Webb, *The Faneuil Hall Markets. An Historical Study*, a volume of *Faneuil Hall Markets Report*, prepared for the Boston Redevelopment Authority by Architectural Heritage, Inc. and the Society for the Preservation of New England Antiquities under the direction of William Endicott, Frederick Stahl, Roger Webb, and Walter Whitehill (Boston: Architectural Heritage, Inc. and the Society for the Preservation of New England Antiquities, 1968), Appendix A.

⁸ Architectural Heritage, Inc. and the Society for the Preservation of New England Antiquities. *Faneuil Hall Markets Report*.

⁹ Amadon, Cummings, Monkhouse, and Webb, 22.

¹⁰ John Quincy, Jr., *Quincy’s Market. A Boston Landmark* (Boston: Northeastern University Press, 2003, reprinted 2019), 102.

Alexander Parris, Architect

Alexander Parris (1780-1852) was one of the most prominent architect-engineers working in Massachusetts in the first half of the 19th century.¹¹ Born in Halifax, Massachusetts, Parris trained as a carpenter's apprentice before relocating upon marriage to Portland, Maine, where he designed and built a number of Federal-style houses for the town's elite. Residing in Richmond, Virginia from 1809 to 1811, Parris is said to have built a number of fine residences for prominent citizens, including the Governor's House. His drawings from this period show "a growing concern for the reduction of classical forms to their cubistic common denominators," showing the indirect influence of English Regency architect Joan Soane, and the direct influence of English immigrant Benjamin Latrobe (1764-1820), the first fully trained professional architect working in the United States, who was active in Richmond at the same time. Parris served as an army engineer during the War of 1812, settling in Boston in 1815.

Parris emerged as Boston's leading architect by 1827, when Federal engineering projects began to dominate his practice to the exclusion of private clients. The earliest buildings attributed to Parris in Boston are located on Beacon Hill: the Federal-style David Sears House, 42-43 Beacon Street (1816, BOS.4095), later the Somerset Club, and the Nathan Appleton House, 39-40 Beacon Street (1818, BOS.4086), later the Women's City Club. Parris also served as superintendent for construction of the Bulfinch Building, Massachusetts General Hospital (1818-1821, BOS.4201; NHL, NR), designed by Charles Bulfinch. Alexander Parris impressed upon Boston "the latter phase of Neoclassicism to which the Federal genre gave way in the 1820s—the Greek Revival."¹² With his design of St. Paul Episcopal Church, 136 Tremont Street (1819, BOS.2082; NHL, NR), he introduced to Boston the monumental, temple-front Greek Revival form in granite, which is seen again in his design for Quincy Market-Faneuil Hall Market, 200-299 Faneuil Hall Marketplace (1824-1826, BOS.1714; NHL, NR, LL). Within two years of completing the Quincy Market commission, Parris limited his practice to engineering pursuits, working primarily for the Federal government until his death, including as chief civil engineer of the Boston Naval Shipyard at Charlestown, where he designed a number of substantial granite buildings over a period of twenty years. Parris concluded his career as chief engineer of the Portsmouth Navy Yard in New Hampshire.

Asher Benjamin, Consulting Architect

As former Mayor Josiah Quincy reported in his *Municipal History of Boston* (1852), Boston architect Asher Benjamin (1773-1845), from his position as a city Alderman and member of the Mayor's Special Committee on the extension of Faneuil Hall, had "in every stage of the building of the new market house, joined in council with Alexander Parris, the employed architect, in devising and improving its original plan."¹³ Benjamin resigned from the committee in February 1825, by which point it appears the plan was fully developed, though it remains unclear whether Benjamin was also involved in the

¹¹ Unless noted otherwise, sources for this section include Amadon, Cummings, Monkhouse, and Webb, 16-20; "Alexander Parris Digital Project," State Library of Massachusetts, et al., accessed September 2020 via Internet Archive Wayback Machine,

<https://web.archive.org/web/20050407020828/http://www.parrisproject.org/About>; Quincy Market Landmark Study Report, 26; and Henry F. Withey and Elsie Rathburn Withey. *Biographical Dictionary of American Architects, Deceased* (Detroit, MI: Omnigraphics, 1996), 458.

¹² Douglass Shand-Tucci, *Built in Boston: City and Suburb 1800-1950*, 2nd ed. (Amherst: The University of Massachusetts Press, 1978, 1988), 11.

¹³ Quincy, 136. Benjamin's involvement in designing the market project with Parris is emphasized in Amadon, Cummings, Monkhouse, and Webb, 12.

design of the South Market and North Market ranges. Asher Benjamin's influence on New England architecture derives principally from his authorship of builders' guides and handbooks published continuously from 1794 to 1841. He adapted the latest European styles to American building conditions, disseminating the Federal and Greek Revival styles to country carpenters throughout New England. Born in Greenfield, Massachusetts, Asher Benjamin worked as a country builder in Connecticut, Vermont, and western Massachusetts before moving to Boston by 1803. His institutional work in Boston ranges from Old West Church, 131 Cambridge Street (1806, BOS.4182; NHL, NRIND, NRDIS), and Charles Street Meeting House, 70 Charles Street (1807, BOS.4074, NHL, NRDIS, LHD), to the Fifth Universalist Church, 76-78 Warrenton Street (later the Charles Playhouse, 1838, BOS.2319, NRIND/MRA). The First African Baptist Church in Boston, 8 Smith Court (African Meeting House, 1806, BOS.4085, NHL, NRDIS, LHD) has been attributed to Benjamin due to the building's similarities with a townhouse plan in his book, *The American Builder's Companion* (1806). In addition to his own Greek Revival house at 9 West Cedar Street (ca. 1833, BOS.15181, NHL, NRDIS, LHD) and adjacent dwellings on the same block, Benjamin's residential work in Boston includes several other dwellings on Beacon Hill.¹⁴

Maturing Marketplace (mid-19th to mid-20th centuries)

The demand for wholesale and retail space at Quincy Market through the early 20th century contributed to a relaxation of the original design guidelines and construction of additions on more than half of the buildings at South Market. Of the original twenty-two buildings comprising the South Market block, at least one dozen buildings were expanded with upper-story additions. At the block's western end, a mansard roof was added to 2-3 South Market Street about 1865, while twelve more buildings were raised from 4½ stories to six full stories between ca. 1880 and 1914. One of the six-story buildings, at 49-50 South Market Street, was constructed in 1938 after a fire destroyed the original.¹⁵ These modifications were reversed beginning in 1972, when the South Market's original gabled roofline was restored.

By the late 19th century, produce vendors began appearing at South Market (as well as North Market), replacing many dry-goods shops. Some fruit and vegetable dealers established wholesale businesses in their individual stores while others retained retail stalls inside the Faneuil Hall Market.¹⁶ A concentration in wholesale provisions tenants included businesses specializing in tea, poultry, meats, and butter, with the introduction of a broader range of businesses, including an awnings wholesaler, farm supplies store, harness manufacturer, and shoe manufacturer.

Many buildings at South Market had long-term owners, some of whom maintained businesses here and others who held the real estate as an income-producing property. Brothers Henry H. Atkins and John E. Atkins of Henry Atkins & Company, wine importers, owned 8-9 South Market from the second quarter of the 19th century until ca. 1910. James Egerton owned 52-54 South Market as early as 1855, and his heirs retained title until at least the late 1930s. Egerton operated a restaurant in the cellar and a provisions warehouse upstairs. His son, Wales L. Egerton of Somerville, continued the enterprise under his own name and that of M. J. Copeland Company provisions, in association with local restaurateur John D. Gilman, who also operated a popular restaurant at 46 Summer Street.

¹⁴ Inventory form for Fifth Universalist Church, 76-78 Warrenton Street (BOS.2319) and other forms as noted.

¹⁵ Roofline and other modifications recorded in 1967 are itemized in Amadon, Cummings, Monkhouse, and Webb, Appendix F.

¹⁶ Quincy, Jr., 129.

Clark Brewer & Sons, tobacconist, owned and occupied 37-38 South Market until the property was sold in the 1930s. Faneuil Hall National Bank occupied the northern end of the block, at 3 South Market, for much of the 19th century. Nathan Robbins of Arlington, a prominent poultry and game merchant who occupied Stall 33 at Faneuil Hall Market, was influential in establishing the bank and served as its second president. Beacon Trust Company operated its branch here until at least 1921. Historic addresses noted here were eliminated with the renumbering of South Market buildings in the late 1970s.

The *Boston Register* shows businesses at South Market in 1921 still tended to be food wholesalers, many specializing in butter, cheese, and eggs, as well as beef, poultry, fruit and produce, candy, coffee and tea, extracts, and macaroni. Others were devoted to food-related supplies, such as canned goods and dairy and creamery supplies, or operated as food brokers or grocers. The block offered two lunch counters and a restaurant, a cigars and tobacco dealer, and three seed stores. Businesses not associated with food were devoted to road machinery, gasoline engines, woolens, and a pump and engine works; a tailor and a typewriter ribbon renewer also operated here.

Decline and Renewal (ca. 1950-1975)

While commercial spaces in the South Market, like most of the other buildings, remained in active use, changing patterns in commerce and transportation precipitated a slow deterioration of the area after World War II. Construction of the John F. Fitzgerald Expressway (1951-1954, former Central Artery, demolished), which carried Interstate 93, U. S. Route 1, and State Route 3 in a three-mile, largely elevated corridor through downtown Boston, practically severed the physical connection between the wholesale food dealers at Quincy Market and the wharves and warehouses on the waterfront. Boston's decline as a seaport and increasing reliance on trucking to move goods had already overwhelmed the market streets twenty years prior, leading some wholesalers to gradually relocate to other areas. In 1950, the U. S. Department of Agriculture, citing obsolete and unsanitary conditions, recommended that Boston establish a new food distribution center at South Bay and close Quincy Market, though the complex still housed half of the city's wholesalers.¹⁷

At the request of Mayor John Collins, in 1960 the Greater Boston Chamber of Commerce established its Waterfront Redevelopment Division to plan for clearance and redevelopment, leading to distribution of the *Downtown Waterfront-Faneuil Hall Urban Renewal Plan* (final draft 1964). The plan drew on a *Market and Land Use Study* (1962) already completed for the target area, for which consultants Brown, Harris, Stevens, Inc. of New York enlisted the help of historians Walter Muir Whitehill and Abbott Lowell Cummings to compile a list of "certain historic buildings and those older buildings of unusual architectural value," among them the South Market.¹⁸ Recognized for their historic and architectural significance, the South Market, North Market, and Faneuil Hall Market (Quincy Market) blocks were recommended for a special rehabilitation study to explore reuse options.¹⁹ Inclusion of the entire market complex in the federally approved Urban Renewal Area also allowed the Boston Redevelopment Authority (BRA) to seek federal funds for the

¹⁷ Quincy, Jr., 141.

¹⁸ Brown, Harris, Stevens, Inc., *Market and Land Use Study Relating to the Planning of Downtown Waterfront Faneuil Hall Renewal Plan*, Boston, Massachusetts, Prepared for the Waterfront Redevelopment Division, Greater Boston Chamber of Commerce (Boston: 1 June 1962), 72.

¹⁹ Brown, Harris, Stevens, Inc., 74.

acquisition and reconstruction of the privately owned South Market and North Market ranges, as part of a larger city project for rehabilitation and reuse.²⁰

In 1966, the BRA contracted with Architectural Heritage, Inc. and the Society for the Preservation of New England Antiquities, now Historic New England, to conduct a feasibility study for the market complex. Submitted in 1968, the five-volume *Faneuil Hall Markets Report* outlined an approach and financial model for adaptive reuse of the three granite blocks, provided detailed research on their history, and served as a prototype for subsequent historic property reports undertaken by preservation groups.

Roger S. Webb (1934-2019) founded Architectural Heritage, Inc. to conduct the feasibility study. A graduate of Harvard College (1958) and Harvard Business School (1961), Webb undertook the historic rehabilitation of Old City Hall, 41-45 School Street (1862, BOS.1977) for commercial office space. He helped establish the Architectural Conservation Trust, a nonprofit revolving fund that evolved into Preservation Massachusetts, the statewide advocacy group for historic preservation.²¹

Frederick A. “Tad” Stahl, FAIA (1930-2013) was instrumental in the adaptive reuse project, co-authoring the report and overseeing the planning for and restoration of the historic buildings into the 1970s. Stahl graduated from Dartmouth College (1952) with a degree in art and architecture, and completed graduate work in architecture at Harvard University and the Massachusetts Institute of Technology (1955). In 1960 he opened his architecture firm, which became F. A. Stahl and Associates Inc., later a division of Stahl-Bennett Architects Inc. Stahl’s career was distinguished by prominent contributions to both historic preservation and innovative modern design. In Boston, his preservation work included adaptive reuse of the Sears Block, 70-72 Cornhill Street (1848, BOS.1673), and restoration of the Old South Meeting House, 308 Washington Street (1729, BOS.2113). Stahl also designed a group of exceptional office buildings in the Central Business District in the 1960s and 1970s, articulating the sculptural qualities of concrete as a building material, among them the State Street Bank Building, 209 Franklin Street (with Pearl Street Associates, 1964, BOS.1745); Loeb, Rhodes, Hornblower and Company Building, 70 Federal Street (1965, BOS.1719); City Bank and Trust Company Building, 25 Court Street (1967, BOS.1680); and Park Street Church Ministries Building, 1 Park Street (1971, BOS.1932). From 1976 to 1982, Frederick Stahl was a partner in Perry Dean Stahl and Rogers before returning to an independent practice.²²

Under the supervision of Frederick Stahl, restoration of the South Market exterior to its 1826 appearance began in October 1972 as part of Phase I of the construction work. For Phase II construction, which included renovation of the interior of South Market among myriad tasks, on March 22, 1973 the BRA designated the Maryland-based Rouse Company as the developers and

²⁰ Quincy, Jr., 152-153.

²¹ “Roger S. Webb,” Legacy.com, [https://www.legacy.com/obituaries/name/roger-webb-
obituary?pid=193189319](https://www.legacy.com/obituaries/name/roger-webb-obituary?pid=193189319), accessed September 3, 2020; and “Description, Architectural Heritage Foundation Collection (CC006),” Historic New England, [https://www.historicnewengland.org/explore/collections-
access/gusn/203700](https://www.historicnewengland.org/explore/collections-access/gusn/203700), accessed September 3, 2020.

²² Kathleen McKenna, “Frederick Stahl, 82; architect with touch for preservation,” *The Boston Globe*, October 1, 2013, [https://www.bostonglobe.com/metro/obituaries/2013/09/30/frederick-stahl-boston-architect-was-
educator-and-mentor/tUNRF2HjlydbpamIgrbxSJ/story](https://www.bostonglobe.com/metro/obituaries/2013/09/30/frederick-stahl-boston-architect-was-educator-and-mentor/tUNRF2HjlydbpamIgrbxSJ/story); Central Business District survey; AIA Historical Directory (1970).

management company, Benjamin Thompson and Associates as architects and planners, and George B. H. Macomber Company as builders.²³

Benjamin C. Thompson, FAIA (1918–2002) earned a bachelor of architecture degree at Yale University (1941). He was a founding member of The Architects Collaborative of Cambridge in 1946, where he was involved with both new construction and adaptive reuse projects, and later chaired the Department of Architecture at Harvard’s Graduate School of Design (1963–1967). In 1953, Thompson established the influential retail shop Design Research, opening stores in Cambridge, New York City, and San Francisco, and designed the company’s headquarters building at 48 Brattle Street, Harvard Square (1969). He formed Benjamin Thompson and Associates (BTA) in 1966, which became known for reinventing vibrant public spaces across the country, among them Harborplace in Baltimore (1980); Ordway Music Theatre in St. Paul, Minnesota (1984); South Street Seaport in New York City (1985); and Union Station in Washington, DC (1988). Thompson was awarded the American Institute of Architects Gold Medal in 1992.

Festival Marketplace (1976–present)

The revitalized and renamed Faneuil Hall Marketplace formally opened August 26, 1976, exactly 150 years after the opening of the three-part complex realized by Mayor Josiah Quincy. South Market re-opened one year later (1977), following completion of an interior redesign that yielded 80,000 square feet of retail space on the basement, ground, and second floors. Fashionable clothing, accessory, jewelry, gift shops, and restaurants filled the spaces once occupied by dry goods merchants and produce wholesalers. Another 80,000 square feet on the upper stories were divided into office suites, retaining granite window frames, wooden beamed ceilings, and exposed brick walls. As an eating and shopping destination that celebrated a historic place while attracting city workers, city residents, suburban visitors, and tourists, the development helped define the “Festival Marketplace” concept of urban – and especially waterfront – development that gained greater popularity nationwide into the 1980s.²⁴

3.2 Architectural (or Other) Significance

The South Market represents an iconic example of the Boston Granite style, an innovative local variant of the Greek Revival style that was typically reserved for commercial buildings. The building is distinguished by its elegantly restrained, full white-granite façade with arched and rectangular windows; post and lintel granite construction on the storefronts on all four elevations and on upper levels of the facade; and a rhythmically articulated roof edge with regularly repeating brick party walls, chimneys, and dormers.

Architecturally, in the words of the *AIA Guide to Boston*, South Market (like the other two buildings in the complex) employed significant construction innovations, including “the first large-scale use of granite and glass in the manner of post-and-beam construction.”²⁵ The Quincy Market buildings are Boston’s oldest surviving buildings using this technique, and Shand-Tucci calls them the finest.²⁶

²³ Quincy, Jr., 172–173, 181, 185.

²⁴ Quincy, Jr., 203, 211–212. North Market reopened August 26, 1978.

²⁵ Susan and Michael Southworth, *AIA Guide to Boston*, 3rd edition (Guilford, CT: Globe Pequot Press, 2008), 54.

²⁶ Shand-Tucci, *Built in Boston*, 14.

The trabeated construction method employed at the South (and North) Market allowed an unprecedented amount of fenestration. Although not the earliest example of this building technique in Boston, it was the most prominent. The construction method was also distinctive for the use of larger pieces of granite than had previously been employed in New England.

The Quincy Market complex as a whole is significant on the local, state, New England, and national levels as an early example of bold urban planning, creating new land and streets to support a radical commercial development that is monumental in scale and austere but sophisticated in its composition and detailing. As described by Walter Muir Whitehill, the trio of Quincy Market buildings

“provided Faneuil Hall with an approach from the harbor of extraordinary dignity and beauty... Although one can no longer see them from the harbor, with the bowsprits of square riggers projecting across Commercial Street—which was their finest vantage point—they remain one of the principal ornaments of Boston, and perhaps the finest architectural composition of the period surviving in the United States.”²⁷

The Quincy Market complex, of which the South Market is an essential part, is also significant for its associations with several exceptional architects of the early 19th and late 20th centuries, who were prominent on the local, state, and national levels. The ensemble is the best-known work of architect Alexander Parris, who designed many of the seminal Greek Revival period buildings of his time in Boston. The South Market is also significant for its associations with Benjamin Thompson Associates (BTA) and Frederick A. Stahl, architects for the 1976 adaptive re-use project. Stahl was specifically responsible for renovations of the South and North Market buildings.

3.3 Archaeological Sensitivity

Downtown Boston is archaeologically sensitive for ancient Native American and historical archaeological sites. It is possible for the survival of ancient Native and historical archaeological sites in the rare areas where development has not destroyed them. As the ancient and historical core of Shawmut, now Boston, any surviving archaeological deposits are likely significant. Any historical sites that survive may document 17th-19th century history related to Boston’s colonial, Revolutionary, early Republic history especially yard spaces where features including cisterns and privies may remain intact and significant archaeological deposits. These sites represent the histories of home-life, artisans, industries, enslaved people, immigrants, and Native peoples spanning multiple centuries. Downtown’s shoreline may contain early submerged ancient Native archaeological sites, shipwrecks, piers, and other marine deposits that may be historically significant.

²⁷ Walter Muir Whitehill and Lawrence W. Kennedy, *Boston: A Topographical History* (Cambridge: Belknap Press, 2000), 97-98.

3.4 Relationship to Criteria for Designation

The South Market Building meets the following criteria for designation as a Boston Landmark as established in Section 4 of Chapter 772 of the Acts of 1975, as amended:

A. Inclusion in National Register of Historic Places as provided in the National Historic Preservation Act of 1966.

B. Structures, sites, objects, man-made or natural, at which events occurred that have made an outstanding contribution to, and are identified prominently with, or which best represent some important aspect of the cultural, political, economic, military, or social history of the city, the commonwealth, the New England region or the nation.

C. Structures, sites, objects, man-made or natural, associated significantly with the lives of outstanding historical personages.

D. Structures, sites, objects, man-made or natural, representative of elements of architectural or landscape design or craftsmanship which embody distinctive characteristics of a type inherently valuable for study of a period, style or method of construction or development, or a notable work of an architect, landscape architect, designer, or builder whose work influenced the development of the city, the commonwealth, the New England region, or the nation.

4.0 ECONOMIC STATUS

4.1 Current Assessed Value

According to the City of Boston's Assessor's Records, the property at Clinton St., Boston, MA, 02109 (parcel 0303670000) where the South Market Building is located has a total assessed value of \$169,832,700, with the land valued at \$116,931,800 and the buildings valued at \$52,900,900 for fiscal year 2021.

4.2 Current Ownership

The entirety of parcel 0303670000 is owned by BPDA and leased by Ashkenazy Acquisition Corporation, 433 Fifth Avenue, Suite 200, New York, NY 10016.

5.0 PLANNING CONTEXT

5.1 Background

From its construction in 1825-1826 to the present, South Market has been in continuous commercial use, with storefronts at the ground-floor spaces. In 1968, the City selected leaders from Boston's business, legal, real estate, and preservation community to serve on the Faneuil Hall Markets Advisory Council. Their mission was to develop a real estate and marketing strategy for the City's underutilized and rapidly deteriorating markets. If salvaged, the markets could serve as "a counterweight and foil to the new Government Center," and an important pedestrian link connecting Beacon Hill to the waterfront. The advisory council sought inspiration from other early market rehabilitation projects, most notably that of San Francisco's Ghirardelli Square. The BRA commissioned two preservation consultants - the Society for the Preservation of New England Antiquities and Architectural Heritage, Inc. - to prepare a market analysis and adaptive reuse feasibility study. This exhaustive report provided a conceptual blueprint for subsequent restoration efforts.

In 1969, the Department of Housing and Urban Development awarded the City approximately two million dollars for market stabilization and restoration of roof lines and facades back to their 1826 appearance. The restoration project team consisted of: Architectural Heritage, Inc., Roger Web; Stahl/Bennett Architects, Frederick A. Stahl, Principal in Charge; Roger Lang, Project Manager; James H. Ballou, Consulting Architect; and William LeMessurier, Structural Engineer. Interior renovations began in 1973 under the direction of the Project Developer, the Rouse Company, of Columbia, Maryland. Benjamin Thompson & Associates were appointed Architects in Charge for the building's conversion into a festival marketplace.

The development strategy respected the architectural integrity of all three markets, while also creating spaces tailored to specialty shops, boutiques, local artisans, and restaurants. Reopened on August 26, 1976, 150 years after the original opening, the new Faneuil Hall Marketplace housed one hundred fifty shops and restaurants, and 140,000 square feet of office space.

Design issues associated with the Marketplace were revisited by the Boston Redevelopment Authority and Faneuil Hall Marketplace, Inc., as part of the 1989 Marketplace Revitalization Program. This initiative focused on ground plane improvements, building improvements, the construction of a free-standing information center in the South Market Street pedestrian area, and signage and lighting issues for the entire complex.

5.2 Zoning

Parcel number 0303670000 is located in the Government Center/Markets zoning district, a Markets Protection Area subdistrict, and the following overlay districts: Greenway Overlay District; Groundwater Conservation Overlay District; Restricted Parking District.

5.3 Planning Issues

The entirety of parcel 0303670000 is owned by BPDA and leased by Ashkenazy Acquisition Corporation, 433 Fifth Avenue, Suite 200, New York, NY 10016. Development within the vicinity of Faneuil Hall Marketplace is subject to Article 45 of the Boston Zoning Code, as established under Chapter 665 of the Acts of 1956. Approved by the Mayor of Boston on April 1, 1991, Article 45 created nine "Protection Areas" within the Government Center/Markets district "in order to protect the existing scale, the quality of the pedestrian environment, and concentrations of historic buildings within and abutting the protection areas." The South Market Building is situated within the "Markets Protection Area."

On August 9, 1994, a petition was submitted to Landmark the South Market Building. At a public hearing on August 23, 1994, the Boston Landmarks Commission voted to accept the petition for further study.

6.0 ALTERNATIVE APPROACHES

6.1 Alternatives available to the Boston Landmarks Commission

A. Designation

The Commission retains the option of designating the South Market Building as a Landmark. Designation shall correspond to the portion of Assessor's parcel 0303670000 that is occupied by the South Market Building, and shall address the following exterior elements hereinafter referred to as the "Specified Features":

- The exterior envelope of the building.

B. Denial of Designation

The Commission retains the option of not designating any or all of the Specified Features.

C. National Register Listing

The Commission could recommend that the property be listed on the National Register of Historic Places, if it is not already.

D. Preservation Plan

The Commission could recommend development and implementation of a preservation plan for the property.

E. Site Interpretation

The Commission could recommend that the owner develop and install historical interpretive materials at the site.

6.2 Impact of alternatives

A. Designation

Designation under Chapter 772 would require review of physical changes to the South Market Building in accordance with the Standards and Criteria adopted as part of the designation.

B. Denial of Designation

Without designation, the City would be unable to offer protection to the Specified Features, or extend guidance to the owners under chapter 772.

C. National Register Listing

The South Market Building is listed on the National Register of Historic Places as part of "Quincy Market." Listing on the National Register provides an honorary designation and limited protection from federal, federally-funded or federally assisted activities. It creates incentives for preservation, notably the federal investment tax credits and grants through the Massachusetts 19 Preservation Projects Fund (MPPF) from the Massachusetts Historical Commission. National Register listing provides listing on the State Register affording parallel protection for projects with state involvement and also the availability of state tax credits.

National Register listing does not provide any design review for changes undertaken by private owners at their own expense.

D. Preservation Plan

A preservation plan allows an owner to work with interested parties to investigate various adaptive use scenarios, analyze investment costs and rates of return, and provide recommendations for subsequent development. It does not carry regulatory oversight.

E. Site Interpretation

A comprehensive interpretation of the history and significance of the South Market Building could be introduced at the site.

7.0 RECOMMENDATIONS

The staff of the Boston Landmarks Commission makes the following recommendations:

1. That the South Market Building be designated by the Boston Landmarks Commission as a Landmark, under Chapter 772 of the Acts of 1975, as amended (see Section 3.4 of this report for Relationship to Criteria for Designation);
2. That the boundaries corresponding to a portion of Assessor's parcel 0303670000 consisting of the footprint of the South Market Building be adopted without modification;
3. And that the Standards and Criteria recommended by the staff of the Boston Landmarks Commission be accepted.

8.0 STANDARDS AND CRITERIA, WITH LIST OF CHARACTER-DEFINING FEATURES

8.1 Introduction

Per sections 4, 5, 6, 7 and 8 of the enabling statute (Chapter 772 of the Acts of 1975 of the Commonwealth of Massachusetts, as amended) Standards and Criteria must be adopted for each Designation which shall be applied by the Commission in evaluating proposed changes to the historic resource. The Standards and Criteria both identify and establish guidelines for those features which must be preserved and/or enhanced to maintain the viability of the Designation. The Standards and Criteria are based on the Secretary of the Interior's Standards for the Treatment of Historic Properties.²⁸ Before a Certificate of Design Approval or Certificate of Exemption can be issued for such changes, the changes must be reviewed by the Commission with regard to their conformance to the purpose of the statute.

The intent of these guidelines is to help local officials, designers and individual property owners to identify the characteristics that have led to designation, and thus to identify the limitation to the changes that can be made to them. It should be emphasized that conformance to the Standards and Criteria alone does not necessarily ensure approval, nor are they absolute, but any request for variance from them must demonstrate the reason for, and advantages gained by, such variance. The Commission's Certificate of Design Approval is only granted after careful review of each application and public hearing, in accordance with the statute.

Proposed alterations related to zoning, building code, accessibility, safety, or other regulatory requirements do not supersede the Standards and Criteria or take precedence over Commission decisions.

In these standards and criteria, the verb **Should** indicates a recommended course of action; the verb **Shall** indicates those actions which are specifically required.

8.2 Levels of Review

The Commission has no desire to interfere with the normal maintenance procedures for the property. In order to provide some guidance for property owners, managers or developers, and the Commission, the activities which might be construed as causing an alteration to the physical character of the exterior have been categorized to indicate the level of review required, based on the potential impact of the proposed work. Note: the examples for each category are not intended to act as a comprehensive list; see Section 8.2.D.

- A. Routine activities which are not subject to review by the Commission:
 - 1. Activities associated with normal cleaning and routine maintenance.

²⁸ U.S. Department of the Interior, et al. *THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES WITH GUIDELINES FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS*, Secretary of the Interior, 2017, www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

- a. For building maintenance, such activities might include the following: normal cleaning (no power washing above 700 PSI, no chemical or abrasive cleaning), non-invasive inspections, in-kind repair of caulking, in-kind repainting, staining or refinishing of wood or metal elements, lighting bulb replacements or in-kind glass repair/replacement, etc.
 - b. For landscape maintenance, such activities might include the following: normal cleaning of paths and sidewalks, etc. (no power washing above 700 PSI, no chemical or abrasive cleaning), non-invasive inspections, in-kind repair of caulking, in-kind spot replacement of cracked or broken paving materials, in-kind repainting or refinishing of site furnishings, site lighting bulb replacements or in-kind glass repair/replacement, normal plant material maintenance, such as pruning, fertilizing, mowing and mulching, and in-kind replacement of existing plant materials, etc.
 2. Routine activities associated with special events or seasonal decorations which do not disturb the ground surface, are to remain in place for less than six weeks, and do not result in any permanent alteration or attached fixtures.
- B. Activities which may be determined by the staff to be eligible for a Certificate of Exemption or Administrative Review, requiring an application to the Commission:
1. Maintenance and repairs involving no change in design, material, color, ground surface or outward appearance.
 2. In-kind replacement or repair.
 3. Phased restoration programs will require an application to the Commission and may require full Commission review of the entire project plan and specifications; subsequent detailed review of individual construction phases may be eligible for Administrative Review by BLC staff.
 4. Repair projects of a repetitive nature will require an application to the Commission and may require full Commission review; subsequent review of these projects may be eligible for Administrative Review by BLC staff, where design, details, and specifications do not vary from those previously approved.
 5. Temporary installations or alterations that are to remain in place for longer than six weeks.
 6. Emergency repairs that require temporary tarps, board-ups, etc. may be eligible for Certificate of Exemption or Administrative Review; permanent repairs will require review as outlined in Section 8.2. In the case of emergencies, BLC staff should be notified as soon as possible to assist in evaluating the damage and to help expedite repair permits as necessary.

- C. Activities requiring an application and full Commission review:

Reconstruction, restoration, replacement, demolition, or alteration involving change in design, material, color, location, or outward appearance, such as: New construction of any type, removal of existing features or elements, major planting or removal of trees or shrubs, or changes in landforms.

- D. Activities not explicitly listed above:

In the case of any activity not explicitly covered in these Standards and Criteria, the Landmarks staff shall determine whether an application is required and if so, whether it shall be an application for a Certificate of Design Approval or Certificate of Exemption.

- E. Concurrent Jurisdiction

In some cases, issues which fall under the jurisdiction of the Landmarks Commission may also fall under the jurisdiction of other city, state and federal boards and commissions such as the Boston Art Commission, the Massachusetts Historical Commission, the National Park Service and others. All efforts will be made to expedite the review process. Whenever possible and appropriate, a joint staff review or joint hearing will be arranged.

8.3 Standards and Criteria

The following Standards and Criteria are based on the Secretary of the Interior's Standards for the Treatment of Historic Properties.²⁹ These Standards and Criteria apply to all exterior building alterations that are visible from any existing or proposed street or way that is open to public travel.

8.3.1 General Standards

1. Items under Commission review include but are not limited to the following: exterior walls (masonry, wood, and architectural metals); windows; entrances/doors; porches/stoops; lighting; storefronts; curtain walls; roofs; roof projections; additions; accessibility; site work and landscaping; demolition; and archaeology. Items not anticipated in the Standards and Criteria may be subject to review, refer to Section 8.2 and Section 9.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alterations of features, spaces and spatial relationships that characterize a property shall be avoided. See Section 8.4, List of Character-defining Features.

²⁹ U.S. Department of the Interior, et al. *THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES WITH GUIDELINES FOR PRESERVING, REHABILITATING, RESTORING & RECONSTRUCTING HISTORIC BUILDINGS*, Secretary of the Interior, 2017, www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, shall not be undertaken.
4. Changes to a property that have acquired historic significance in their own right shall be retained and preserved. (The term “later contributing features” will be used to convey this concept.)
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new material shall match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, shall be undertaken using the gentlest means possible. Treatments that cause damage to historic materials shall not be used.
8. Staff archaeologists shall review proposed changes to a property that may impact known and potential archaeological sites. Archaeological surveys may be required to determine if significant archaeological deposits are present within the area of proposed work. Significant archaeological resources shall be protected and preserved in place. If such resources must be disturbed, mitigation measures will be required before the proposed work can commence. See section 9.0 Archaeology.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials, features, and spatial relationships that characterize a property. The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of a property and its environment.
10. New additions and adjacent or related new construction shall 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.
11. Original or later contributing signs, marquees, and canopies integral to the building ornamentation or architectural detailing shall be preserved.
12. New signs, banners, marquees, canopies, and awnings shall be compatible in size, design, material, location, and number with the character of the building, allowing for contemporary expression. New signs shall not detract from the essential form of the building nor obscure its architectural features.
13. Property owners shall take necessary precautions to prevent demolition by neglect of maintenance and repairs. Demolition of protected buildings in violation of Chapter 772 of the Acts of 1975, as amended, is subject to penalty as cited in Section 10 of Chapter 772 of the Acts of 1975, as amended.

8.3.2 Masonry at exterior walls (including but not limited to stone, brick, terra cotta, concrete, adobe, stucco, and mortar)

1. All original or later contributing masonry materials shall be preserved.
2. Original or later contributing masonry materials, features, details, surfaces and ornamentation shall be repaired, if necessary, by patching, splicing, consolidating, or otherwise reinforcing the masonry using recognized preservation methods.
3. Deteriorated or missing masonry materials, features, details, surfaces, and ornamentation shall be replaced with materials and elements which match the original in material, color, texture, size, shape, profile, and detail of installation.
4. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
5. If the same material is not technically or economically feasible, then compatible substitute materials may be considered.
6. Sound original mortar shall be retained.
7. Deteriorated mortar shall be carefully removed by hand raking the joints.
8. Use of mechanical hammers shall not be allowed. Use of mechanical saws may be allowed on a case-by-case basis.
9. Repointing mortar shall duplicate the original mortar in strength, composition, color, texture, joint size, joint profile, and method of application.
10. Sample panels of raking the joints and repointing shall be reviewed and approved by the staff of the Boston Landmarks Commission.
11. Cleaning of masonry is discouraged and should only be performed when necessary to halt deterioration.
12. If the building is to be cleaned, the masonry shall be cleaned with the gentlest method possible.
13. A test patch of the cleaning method(s) shall be reviewed and approved on site by staff of the Boston Landmarks Commission to ensure that no damage has resulted. Test patches shall be carried out well in advance. Ideally, the test patch should be monitored over a sufficient period of time to allow long-range effects to be predicted (including exposure to all seasons if possible).
14. Sandblasting (wet or dry), wire brushing, or other similar abrasive cleaning methods shall not be permitted. Doing so can change the visual quality of the material and damage the surface of the masonry and mortar joints.
15. Waterproofing or water repellents are strongly discouraged. These treatments are generally not effective in preserving masonry and can cause permanent damage. The

Commission does recognize that in extraordinary circumstances their use may be required to solve a specific problem. Samples of any proposed treatment shall be reviewed by the Commission before application.

16. In general, painting masonry surfaces shall not be allowed. Painting masonry surfaces will be considered only when there is documentary evidence that this treatment was used at some significant point in the history of the property.
17. New penetrations for attachments through masonry are strongly discouraged. When necessary, attachment details shall be located in mortar joints, rather than through masonry material; stainless steel hardware is recommended to prevent rust jacking. New attachments to cast concrete are discouraged and will be reviewed on a case-by-case basis.
18. Deteriorated stucco shall be repaired by removing the damaged material and patching with new stucco that duplicates the old in strength, composition, color, and texture.
19. Deteriorated adobe shall be repaired by using mud plaster or a compatible lime-plaster adobe render, when appropriate.
20. Deteriorated concrete shall be repaired by cutting damaged concrete back to remove the source of deterioration, such as corrosion on metal reinforcement bars. The new patch shall be applied carefully so that it will bond satisfactorily with and match the historic concrete.
21. Joints in concrete shall be sealed with appropriate flexible sealants and backer rods, when necessary.

8.3.3 Wood at exterior walls

1. All original or later contributing wood materials shall be preserved.
2. Original or later contributing wood surfaces, features, details, and ornamentation shall be retained and, if necessary, repaired by patching, piecing-in, consolidating, or reinforcing the wood using recognized preservation methods.
3. Deteriorated or missing wood surfaces, features, details, and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, and detail or installation.
4. When replacement of materials is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
6. Cleaning of wood elements shall use the gentlest method possible.
7. Paint removal should be considered only where there is paint surface deterioration or excessive layers of paint have coarsened profile details and as part of an overall

maintenance program which involves repainting or applying other appropriate protective coatings. Coatings such as paint help protect the wood from moisture and ultraviolet light; stripping the wood bare will expose the surface to the effects of weathering.

8. Damaged or deteriorated paint should be removed to the next sound layer using the mildest method possible.
9. Propane or butane torches, sandblasting, water blasting, or other abrasive cleaning and/or paint removal methods shall not be permitted. Doing so changes the visual quality of the wood and accelerates deterioration.
10. Repainting should be based on paint seriation studies. If an adequate record does not exist, repainting shall be done with colors that are appropriate to the style and period of the building.

8.3.4 Architectural metals at exterior walls (including but not limited to wrought and cast iron, steel, pressed metal, terneplate, copper, aluminum, and zinc)

1. All original or later contributing architectural metals shall be preserved.
2. Original or later contributing metal materials, features, details, and ornamentation shall be retained and, if necessary, repaired by patching, splicing, or reinforcing the metal using recognized preservation methods.
3. Deteriorated or missing metal materials, features, details, and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, and detail or installation.
4. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
6. Cleaning of metal elements either to remove corrosion or deteriorated paint shall use the gentlest method possible.
7. The type of metal shall be identified prior to any cleaning procedure because each metal has its own properties and may require a different treatment.
8. Non-corrosive chemical methods shall be used to clean soft metals (such as lead, tinplate, terneplate, copper, and zinc) whose finishes can be easily damaged by abrasive methods.
9. If gentler methods have proven ineffective, then abrasive cleaning methods, such as low pressure dry grit blasting, may be allowed for hard metals (such as cast iron, wrought iron, and steel) as long as it does not abrade or damage the surface.

10. A test patch of the cleaning method(s) shall be reviewed and approved on site by staff of the Boston Landmarks Commission to ensure that no damage has resulted. Test patches shall be carried out well in advance. Ideally, the test patch should be monitored over a sufficient period of time to allow long-range effects to be predicted (including exposure to all seasons if possible).
11. Cleaning to remove corrosion and paint removal should be considered only where there is deterioration and as part of an overall maintenance program which involves repainting or applying other appropriate protective coatings. Paint or other coatings help retard the corrosion rate of the metal. Leaving the metal bare will expose the surface to accelerated corrosion.
12. Repainting should be based on paint seriation studies. If an adequate record does not exist, repainting shall be done with colors that are appropriate to the style and period of the building.

8.3.5 Windows (also refer to Masonry, Wood, and Architectural Metals)

1. The original or later contributing arrangement of window openings shall be retained.
2. Enlarging or reducing window openings for the purpose of fitting stock (larger or smaller) window sash or air conditioners shall not be allowed.
3. Removal of window sash and the installation of permanent fixed panels to accommodate air conditioners shall not be allowed.
4. Original or later contributing window elements, features (functional and decorative), details, and ornamentation shall be retained and, if necessary, repaired by patching, splicing, consolidating, or otherwise reinforcing using recognized preservation methods.
5. Deteriorated or missing window elements, features (functional and decorative), details, and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration, and detail of installation.
6. When replacement is necessary, it should be based on physical or documentary evidence.
7. Replacement sash for divided-light windows should have through-glass muntins or simulated divided lights with dark anodized spacer bars the same width as the muntins.
8. Tinted or reflective-coated glass shall not be allowed.
9. Metal or vinyl panning of the wood frame and molding shall not be allowed.
10. Exterior combination storm windows shall have a narrow perimeter framing that does not obscure the glazing of the primary window. In addition, the meeting rail of the combination storm window shall align with that of the primary window.

11. Storm window sashes and frames shall have a painted finish that matches the primary window sash and frame color.
12. Clear or mill finished aluminum frames shall not be allowed.
13. Window frames, sashes, and, if appropriate, shutters, should be of a color based on paint seriation studies. If an adequate record does not exist, repainting shall be done with colors that are appropriate to the style and period of the building.

8.3.6 Entrances/Doors (also refer to Masonry, Wood, Architectural Metals, and Porches/Stoops)

1. All original or later contributing entrance elements shall be preserved.
2. The original or later contributing entrance design and arrangement of the door openings shall be retained.
3. Enlarging or reducing entrance/door openings for the purpose of fitting stock (larger or smaller) doors shall not be allowed.
4. Original or later contributing entrance materials, elements, details and features (functional and decorative) shall be retained and, if necessary, repaired by patching, splicing, consolidating or otherwise reinforcing using recognized preservation methods.
5. Deteriorated or missing entrance elements, materials, features (function and decorative) and details shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
6. When replacement is necessary, it should be based on physical or documentary evidence.
7. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
8. Original or later contributing entrance materials, elements, features (functional and decorative) and details shall not be sheathed or otherwise obscured by other materials.
9. Storm doors (aluminum or wood-framed) shall not be allowed on the primary entrance unless evidence shows that they had been used. They may be allowed on secondary entrances. Where allowed, storm doors shall be painted to match the color of the primary door.
10. Unfinished aluminum storm doors shall not be allowed.
11. Replacement door hardware should replicate the original or be appropriate to the style and period of the building.
12. Buzzers, alarms and intercom panels, where allowed, shall be flush mounted and appropriately located.

13. Entrance elements should be of a color based on paint seriation studies. If an adequate record does not exist, repainting shall be done with colors that are appropriate to the style and period of the building/entrance.

8.3.7 Porches/Stoops (also refer to Masonry, Wood, Architectural Metals, Entrances/Doors, Roofs, and Accessibility)

1. All original or later contributing porch elements shall be preserved.
2. Original or later contributing porch and stoop materials, elements, features (functional and decorative), details and ornamentation shall be retained if possible and, if necessary, repaired using recognized preservation methods.
3. Deteriorated or missing porch and stoop materials, elements, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute material may be considered.
6. Original or later contributing porch and stoop materials, elements, features (functional and decorative), details and ornamentation shall not be sheathed or otherwise obscured by other materials.
7. Porch and stoop elements should be of a color based on paint seriation studies. If an adequate record does not exist repainting shall be done with colors that are appropriate to the style and period of the building/porch and stoop.

8.3.8 Lighting

1. There are several aspects of lighting related to the exterior of the building and landscape:
 - a. Lighting fixtures as appurtenances to the building or elements of architectural ornamentation.
 - b. Quality of illumination on building exterior.
 - c. Security lighting.
2. Wherever integral to the building, original or later contributing lighting fixtures shall be retained and, if necessary, repaired by patching, piercing in or reinforcing the lighting fixture using recognized preservation methods.
3. Deteriorated or missing lighting fixtures materials, elements, features (functional and decorative), details, and ornamentation shall be replaced with material and elements

- which match the original in material, color, texture, size, shape, profile, configuration, and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
 5. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
 6. Original or later contributing lighting fixture materials, elements, features (functional and decorative), details, and ornamentation shall not be sheathed or otherwise obscured by other materials.
 7. Supplementary illumination may be added where appropriate to the current use of the building.
 8. New lighting shall conform to any of the following approaches as appropriate to the building and to the current or projected use:
 - a. Reproductions of original or later contributing fixtures, based on physical or documentary evidence.
 - b. Accurate representation of the original period, based on physical or documentary evidence.
 - c. Retention or restoration of fixtures which date from an interim installation and which are considered to be appropriate to the building and use.
 - d. New lighting fixtures which are differentiated from the original or later contributing fixture in design and which illuminate the exterior of the building in a way which renders it visible at night and compatible with its environment.
 9. The location of new exterior lighting shall fulfill the functional intent of the current use without obscuring the building form or architectural detailing.
 10. No exposed conduit shall be allowed on the building.
 11. Architectural night lighting is encouraged, provided the lighting installations minimize night sky light pollution. High efficiency fixtures, lamps and automatic timers are recommended.
 12. On-site mock-ups of proposed architectural night lighting may be required.

8.3.9 Storefronts (also refer to Masonry, Wood, Architectural Metals, Windows, Entrances/Doors, Porches/Stoops, Lighting, and Accessibility)

1. Refer to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Storefront section).

8.3.10 Curtain Walls (also refer to Masonry, Wood, Architectural Metals, Windows, and Entrances/Doors)

1. Refer to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Curtain Walls section).

8.3.11 Roofs (also refer to Masonry, Wood, Architectural Metals, and Roof Projections)

1. The roof shapes and original or later contributing roof material of the existing building shall be preserved.
2. Original or later contributing roofing materials such as slate, wood trim, elements, features (decorative and functional), details and ornamentation, such as cresting, shall be retained and, if necessary, repaired by patching or reinforcing using recognized preservation methods.
3. Deteriorated or missing roofing materials, elements, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute material may be considered.
6. Original or later contributing roofing materials, elements, features (functional and decorative), details and ornamentation shall not be sheathed or otherwise obscured by other materials.
7. Unpainted mill-finished aluminum shall not be allowed for flashing, gutters and downspouts. All replacement flashing and gutters should be copper or match the original material and design (integral gutters shall not be replaced with surface-mounted).
8. External gutters and downspouts should not be allowed unless it is based on physical or documentary evidence.

8.3.12 Roof Projections (includes satellite dishes, antennas and other communication devices, louvers, vents, chimneys, and chimney caps; also refer to Masonry, Wood, Architectural Metals, and Roofs)

1. New roof projections shall not be visible from the public way.
2. New mechanical equipment should be reviewed to confirm that it is no more visible than the existing.

8.3.13 Additions

1. Additions can significantly alter the historic appearance of the buildings. An exterior addition should only be considered after it has been determined that the existing building cannot meet the new space requirements.
2. New additions shall be designed so that the character-defining features of the building are not radically changed, obscured, damaged or destroyed.
3. New additions should be designed so that they are compatible with the existing building, although they should not necessarily be imitative of an earlier style or period.
4. New additions shall not obscure the front of the building.
5. New additions shall be of a size, scale, and materials that are in harmony with the existing building.

8.3.14 Accessibility

1. Alterations to existing buildings for the purposes of providing accessibility shall provide persons with disabilities the level of physical access to historic properties that is required under applicable law, consistent with the preservation of each property's significant historical features, with the goal of providing the highest level of access with the lowest level of impact. Access modifications for persons with disabilities shall be designed and installed to least affect the character-defining features of the property. Modifications to some features may be allowed in providing access, once a review of options for the highest level of access has been completed.
2. A three-step approach is recommended to identify and implement accessibility modifications that will protect the integrity and historic character of the property:
 - a. Review the historical significance of the property and identify character-defining features;
 - b. Assess the property's existing and proposed level of accessibility;
 - c. Evaluate accessibility options within a preservation context.
3. Because of the complex nature of accessibility, the Commission will review proposals on a case-by-case basis. The Commission recommends consulting with the following document which is available from the Commission office: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation Assistance Division; Preservation Brief 32 "Making Historic Properties Accessible" by Thomas C. Jester and Sharon C. Park, AIA.

8.3.15 Renewable Energy Sources

1. Renewable energy sources, including but not limited to solar energy, are encouraged for the site.

2. Before proposing renewable energy sources, the building's performance shall be assessed and measures to correct any deficiencies shall be taken. The emphasis shall be on improvements that do not result in a loss of historic fabric. A report on this work shall be included in any proposal for renewable energy sources.
3. Proposals for new renewable energy sources shall be reviewed by the Commission on a case-by-case basis for potential physical and visual impacts on the building and site.
4. Refer to the Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings for general guidelines.

8.3.16 Guidelines

The following are additional Guidelines for the treatment of the historic property:

1. Should any major restoration or construction activity be considered for a property, the Boston Landmarks Commission recommends that the proponents prepare a historic building conservation study and/or consult a materials conservator early in the planning process.
 - a. The Boston Landmarks Commission specifically recommends that any work on masonry, wood, metals, or windows be executed with the guidance of a professional building materials conservator.
2. Should any major restoration or construction activity be considered for a property's landscape, the Boston Landmarks Commission recommends that the proponents prepare a historic landscape report and/or consult a landscape historian early in the planning process.
3. The Commission will consider whether later addition(s) and/or alteration(s) can, or should, be removed. Since it is not possible to provide one general guideline, the following factors will be considered in determining whether a later addition(s) and/or alteration(s) can, or should, be removed include:
 - a. Compatibility with the original property's integrity in scale, materials and character.
 - b. Historic association with the property.
 - c. Quality in the design and execution of the addition/alteration.
 - d. Functional usefulness.

8.4 List of Character-defining Features

Character-defining features are the significant observable and experiential aspects of a historic resource, whether a single building, landscape, or multi-property historic district, that define its architectural power and personality. These are the features that should be identified, retained, and preserved in any restoration or rehabilitation scheme in order to protect the resource's integrity.

Character-defining elements include, for example, the overall shape of a building and its materials, craftsmanship, decorative details and features, as well as the various aspects of its site and

environment. They are critically important considerations whenever preservation work is contemplated. Inappropriate changes to historic features can undermine the historical and architectural significance of the resource, sometimes irreparably.

Below is a list that identifies the physical elements that contribute to the unique character of the historic resource. The items listed in this section should be considered important aspects of the historic resource and changes to them should be approved by commissioners only after careful consideration.

The character-defining features for this historic resource include:

- The South Market represents an iconic example of the Boston Granite style, an innovative local variant of the Greek Revival style.
- North façades constructed of Chelmsford granite, including first floors of the side and back walls.
- The façade is post-and-lintel, or trabeated construction on all floors, including granite storefronts on the ground floor, semi-circular arched windows at the second floor, and rectangular windows on the third and fourth floors.
- A vaulted passageway connecting South Market Street with Chatham Street.
- Two-story high, metal storefronts with a pointed arch.
- A granite cornice punctuated by terra cotta corbels at the party walls lines the eave on the façade.
- The brick gable end elevations at the ground level have trabeated granite storefronts at the outer bays that are separated by a center panel of granite block; all four building corners are rounded and feature chamfered tops.
- The slate shingled roof is interrupted by brick party walls rising above the roofline to a raised parapet with a chimney positioned at the ridgeline.
- A slate-clad, hip-roofed dormer on both roof slopes.
- Galvanized steel gutters and downspouts drain the roof slopes.
- Ornamental cast iron piers on some storefronts.

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9.0 ARCHAEOLOGY

All below-ground work within the property shall be reviewed by the Boston Landmarks Commission and City Archaeologist to determine if work may impact known or potential archaeological resources. An archaeological survey shall be conducted if archaeological sensitivity exists and if impacts to known or potential archaeological resources cannot be mitigated after consultation with the City Archaeologist. All archaeological mitigation (monitoring, survey, excavation, etc.) shall be conducted by a professional archaeologist. The professional archaeologist should meet the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

Refer to Section 8.3 for any additional Standards and Criteria that may apply.

10.0 SEVERABILITY

The provisions of these Standards and Criteria (Design Guidelines) are severable and if any of their provisions shall be held invalid in any circumstances, such invalidity shall not affect any other provisions or circumstances.

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