

BLUE CROSS BLUE SHIELD BUILDING

BOSTON LANDMARKS COMMISSION STUDY REPORT



Petition # 255.16
Boston Landmarks Commission
Office of Historic Preservation
City of Boston

Report on the Potential Designation of

Blue Cross Blue Shield Building
133 Federal Street, Boston, Massachusetts

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

Approved by:



November 20, 2023

Rosanne Foley, Executive Director

Date

Approved by:



November 20, 2023

Bradford C. Walker, Chair

Date

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Cover image: South and east elevations, Blue Cross Blue Shield Building, June 16, 2023, Laura Lacombe

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INTRODUCTION

The designation of the Blue Cross Blue Shield Building was initiated in 2016 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

The building at 133 Federal St., colloquially known as the Blue Cross Blue Shield Building (1960), is significant for its associations with the urban renewal movement in Boston's core downtown area in the 1950s and 1960s. It was the first new building erected in the Central Business District since the 1920s and was one of the earliest buildings erected in Boston in the Brutalist style. It is one of three buildings in Boston designed by Paul Rudolph; it is especially notable as his first tall building and an early prototype of the idiosyncratic design philosophies that would influence the remainder of his impactful career. Its distinctive form with Y-shaped, precast-concrete piers and columns, large white quartz aggregate, and an innovative engineering and HVAC system hidden within the nonstructural columns were all a direct challenge to the glass curtain wall and pushed the boundaries of contemporary architectural discourse. The building contributes to Boston's collection of Brutalist architecture, which transformed the city in the 1960s and 1970s, and represents the resulting shift in the design idiom of Boston and the United States from the International style to postmodernism.

In 2016, Trans National Properties proposed the demolition of the Blue Cross Blue Shield Building as part of its proposal to redevelop Winthrop Square.¹ Ultimately, that proposal was not selected, but the threat of demolition remains. The exterior of the building recently suffered some damage in connection with adjacent construction, with several precast Mo-Sai concrete panels falling off the skirt wall along the north edge of the property. This has been repaired. Recent threats to Rudolph's diminishing body of work, combined with a 2009 Boston Landmarks Commission's survey update of cultural and architectural resources in Boston's Central Business District that determined the Blue Cross Blue Shield Building was eligible for listing on the National Register of Historic Places, inspired the petition for designation.²

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

¹ Tim Logan, "Developers pitch for chance to build Winthrop Square tower," Boston Globe, April 21, 2016. <https://www.bostonglobe.com/business/2016/04/21/developers-pitch-bra-for-chance-build-winthrop-square-tower/OQNICnQFY8xVyGncSmfzTK/story.html>

² Boston Landmarks Commission, Landmark Petition Form, Petition No. 255.16, BLC Archive.

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1.0 LOCATION

1.1 Address

According to the City of Boston's Assessing Department, the Blue Cross Blue Shield Building is located at 133 Federal Street, Boston MA 02110.

1.2 Assessor's Parcel Number

The Assessor's Parcel Number is 0304206000.

1.3 Area in which Property is Located

The Blue Cross Blue Shield Building is located at 133 Federal St. in the Boston Proper zoning district, with Federal Street bordering the parcel to the east. Two private ways, Federal Court and Milton Place, border the parcel. The property is closely surrounded by commercial buildings, with Winthrop Center on the north and west, 100 Summer Street on the southwest, 155 Federal St. to the south, and 160 Federal St. (The United Shoe Machinery Corporation Building, a designated Boston Landmark) across Federal Street to the east. A small outdoor plaza creates open space on the south side of the property and a concrete fountain serves as the only independent building feature within the property boundaries of the Blue Cross Blue Shield Building.

1.4 Map Showing Location

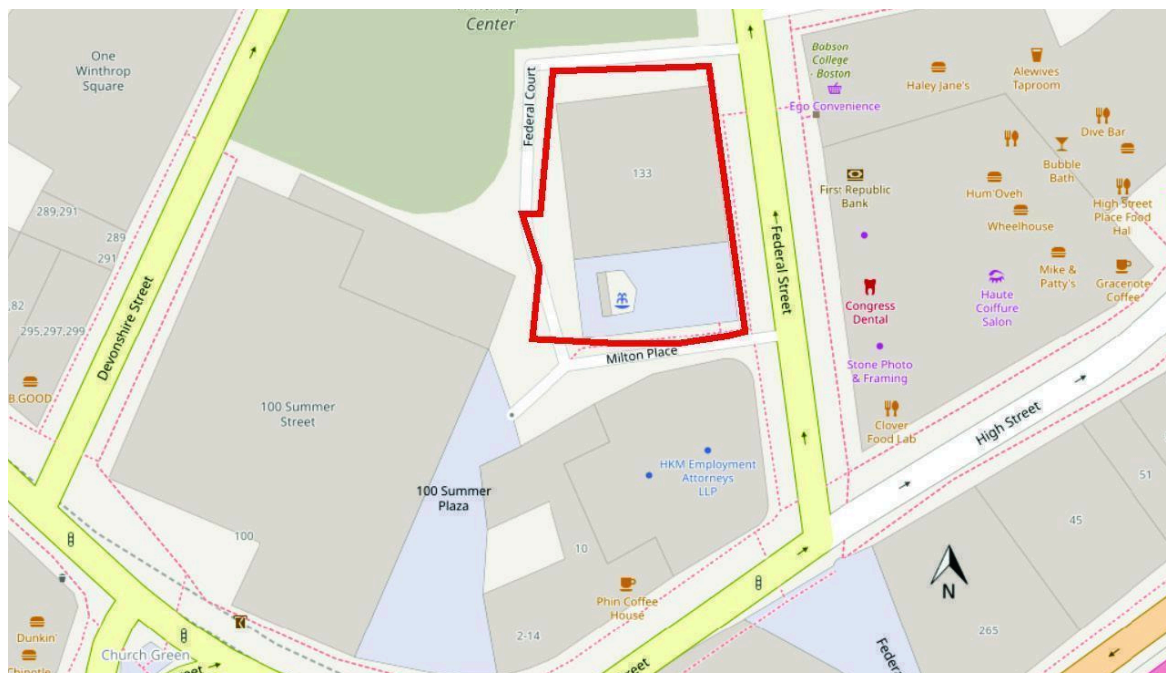


Figure 1. Map showing the boundaries of parcel #0304206000 (MassMapper).

2.0 DESCRIPTION

2.1 Type and Use

The Blue Cross Blue Shield Building was designed to provide office space for the Blue Cross Blue Shield Corporation's 800 clerical workers.³ When it was completed, the area where it is located was already known as the Central Business District and it has remained a dense commercial area up to the time of this study report in 2023. In 1975, the architectural firm Sasaki designed a renovation to the first floor to accommodate a bank. In 1979, a health club was placed in the basement, and in the 1980s an art gallery was added. Today, the building's ground floor contains two retail spaces, one occupied by a restaurant and one vacant. The property is zoned to allow for a Planned Development Area and is within a Restricted Parking District.

2.2 Physical Description of the Resource

The Blue Cross Blue Shield Building is a 13-story commercial building in Boston's Central Business District, designed by Paul Rudolph in the Brutalist style and completed in 1960. The building is noteworthy for its experimental use of precast concrete employed in a three-dimensional façade with a rationalist construction approach, a clear departure from the glass curtain wall skyscrapers that had become common in the 1950s. The building is set above street level on a raised podium that contains the sub-basement and basement levels, framed by concrete retaining walls. Approximately one-third of the raised platform is dedicated to serving as a public plaza on the south side of the building, providing an exterior space for social interaction in an otherwise crowded commercial area.

The structure consists of a complete reinforced concrete frame bearing on caissons (see **Figure 2**).⁴ Wind bracing is accomplished by means of full-height interior concrete shear walls.⁵ The floors and roof are framed with concrete beams and flat or pan-type concrete slabs. The offset, compact, service core, which houses elevators and egress stairs, was designed by renowned structural engineer Paul Weidlinger. The exterior facing consists of precast, reinforced concrete panels anchored to, and supported by, the structural frame.⁶

The building features a double-height ground level of deeply recessed glass walls, and a second level of continuous glass windows set above a concrete spandrel. The recessed first two stories are set behind Y-shaped precast concrete columns. The twin concrete columns that spring from the arms of the Y-shaped supports carry heating and cooling ducts up the entire height of the building, reducing the need for ductwork between floors. Although this ingenuity of system treatment permitted Rudolph to incorporate two additional stories into the original height limit of the building, the novel approach also was likely the impetus of the controversy surrounding the building.⁷ A third column floats between each set of twin columns, providing additional servicing ducts for the

³ City of Boston Application to the Building Commissioner for Permit, Permit no. 525, May 7, 1958.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Massachusetts Cultural Resources Information System (MACRIS), BOS.1725, Blue Cross-Blue Shield Building - Union Warren Bank.

building. The columns serve a dual purpose as faceted mullions framing single-pane vertical windows, with concrete spandrels below each window alternating between flat and recessed angled panels. Projecting window sills with V-shaped cutouts carry the thin horizontal lines of the building around its chamfered corners. The crown of the building is accentuated in its verticality by a tall band of solid concrete panels at the roofline, broken only by the precast concrete columns that extend just past the tops of the panels.

Rudolph designed specially textured precast concrete cladding panels with large-scale exposed white quartz aggregate; this product is known by the trade name, Mo-Sai (named for the mosaics it resembled). The exposed aggregate is intended to glitter in the sun and age like traditional masonry and was very similar to the precast panels that French architect Auguste Perret used in his design to rebuild the city of Le Havre after World War II.⁸ These concrete panels were manufactured off site and attached to the steel frame of the building with clamps. Mo-Sai panels of the same materials and texture provide cladding for the single-story loading dock off the west side of the building and clad the skirt walls around the base platform of the building. Rudolph's combination of rough and reflective textures mixed with strong geometric forms results in a complex interplay of light and shadow across the building throughout the day (see **Figure 9**).

The intimate, European-style plaza to the south of the building is carefully scaled to fit into the Central Business District's historic surroundings and cramped and angular streets. A non-original fountain wall borders the plaza's western edge and metal railings (replacements, not original) edge the plaza. Originally, benches also surrounded the plaza and provided a barrier from the street below, creating a semi-private outdoor respite for workers and visitors. Although no longer extant, diagonally positioned pyramidal crystalline skylights erupted from the center of the plaza and provided both visual interest for plaza visitors and natural lighting for the basement-level cafeteria (see **Figure 19**). These have been replaced with rectangular brownstone pavers and round, raised planters, each containing a single tree. Diagonal bluestone paving originally continued from the plaza through two pairs of double-leaf glass doors and into the two-story-high lobby, seamlessly sweeping visitors into the building and making the plaza appear as an extension of the interior space. The lobby has two retail spaces and access to the upper levels of offices. A service core through the center of the building provides elevator shafts and stairs within load-bearing reinforced concrete walls, providing interior support to each floor in addition to the steel structure around the perimeter of the building.

The building's exterior has not been significantly altered since its completion in 1960. While an additional egress from the basement level to the street at the southeast corner of the raised plaza is original and retains original Mo-Sai panels on its walls (see **Figure 16**), new pole lights were added to the plaza; however, the original lights suspended from the ceiling above the Federal Street entrance remain. Two additional glass door entrances were added to the east façade on Federal Street. A double-door egress on the south elevation is original, although the configuration has been changed so the right-side door is now a window. An egress on the north elevation has been added. A rear service entrance extension off the west elevation is original (see **Figure 16**), as are two flanking egresses.

⁸ Timothy M. Rohan, "Challenging the Curtain Wall: Paul Rudolph's Blue Cross and Blue Shield Building," *Journal of the Society of Architectural Historians*, Vol. 66, No. 1 (March 2007), 101.

2.3 Contemporary Images



Figure 2. East façade, January 2024. Photo by Boston Landmarks Commission staff.



Figure 3. South elevation, June 2023. Photo by Building Conservation Associates.



Figure 4. South and west elevations, June 2023. Photo by Building Conservation Associates.



Figure 5. East façade (left) and north elevation (right), January 2024. Photo by Boston Landmarks Commission staff.



Figure 6. East entrance, January 2024. Photo by BE Realty.



Figure 7. View from below south elevation showing Y-shaped columns, V-cutouts in sills, and concrete columns rising to the cornice, June 2023. Photo by Building Conservation Associates.



Figure 8. Plaza with round planters (which replaced original pyramidal skylights) and fountain wall in background, looking west, June 2023. Photo credit: Building Conservation Associates.



Figure 9. Closeup of Mo-Sai concrete mixture, June 2023. Photo by Building Conservation Associates.

2.4 Historic Maps and Images



Figure 10. 1867 fire insurance map showing clothing factory built of masonry construction at the site of the future Blue Cross Blue Shield Building.

Source: Insurance Map of Boston, Vol. 1 (D.A. Sanborn, 1867), Boston Public Library, Norman B. Leventhal Map Center.

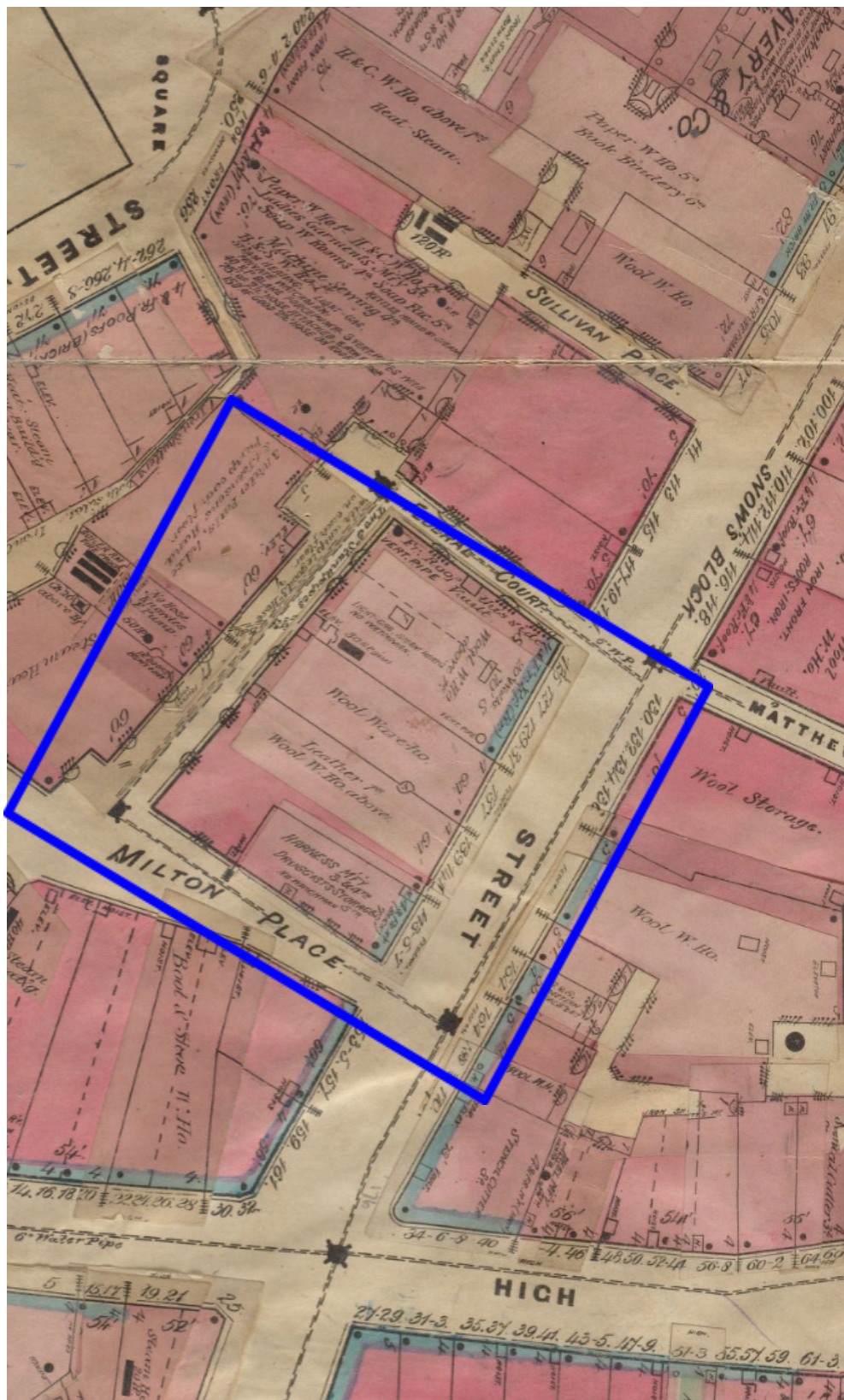


Figure 11. 1882 fire insurance map showing additional masonry construction since 1867—wool and leather factories and storage.

Source: Insurance Map of Boston, Vol. 1 (D. A. Sanborn, 1882), Boston Public Library, Norman B. Leventhal Map Center.



Figure 12. 1883 Boston Atlas showing Hunnewell and Torrey as owners of leather and wool factories, and D. L. & J. G. Webster as owners of the pharmacy.

Source: Bromley, G. W., Atlas of the City of Boston : city proper, Vol. 1 (Philadelphia : G. W. Bromley & Co., 1883). Atlascope.

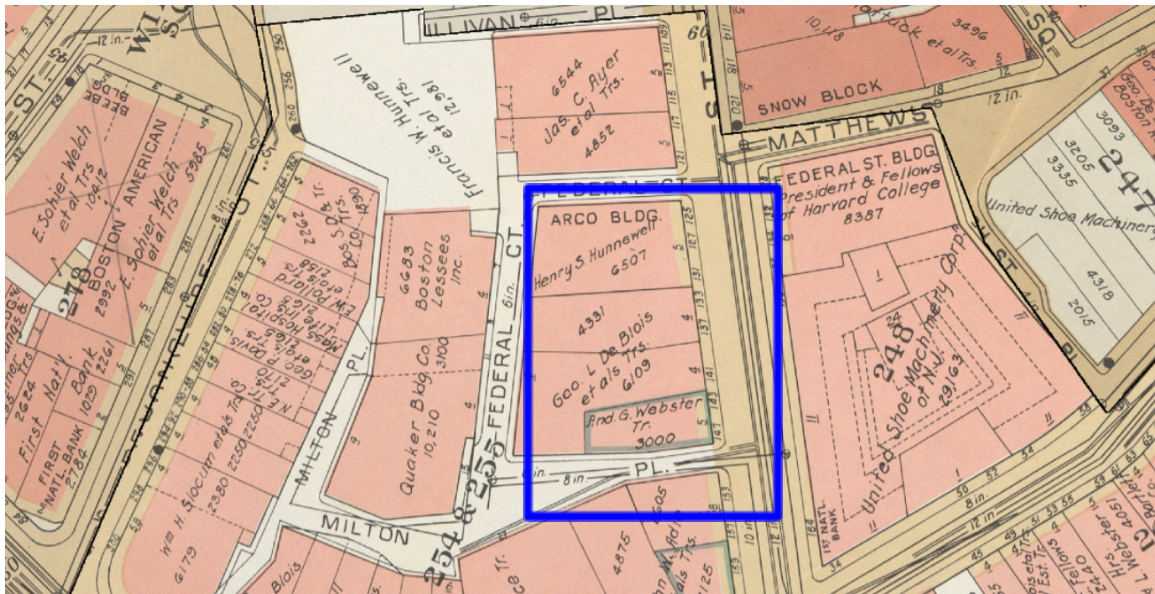


Figure 13. 1938 Boston Atlas showing Hunnewell, Du Blois, and Webster as property owners.

Source: Atlas of the City of Boston : Boston Proper and Back Bay (G. W. Bromley & Co., 1938). Atlascope.



Figure 14. Blue Cross building under construction, Financial District, Boston, 1958-1960.

Source: Northeastern University Library, Archives and Special Collections (M221), FayFoto A99-1201.
<http://hdl.handle.net/2047/D20396307>

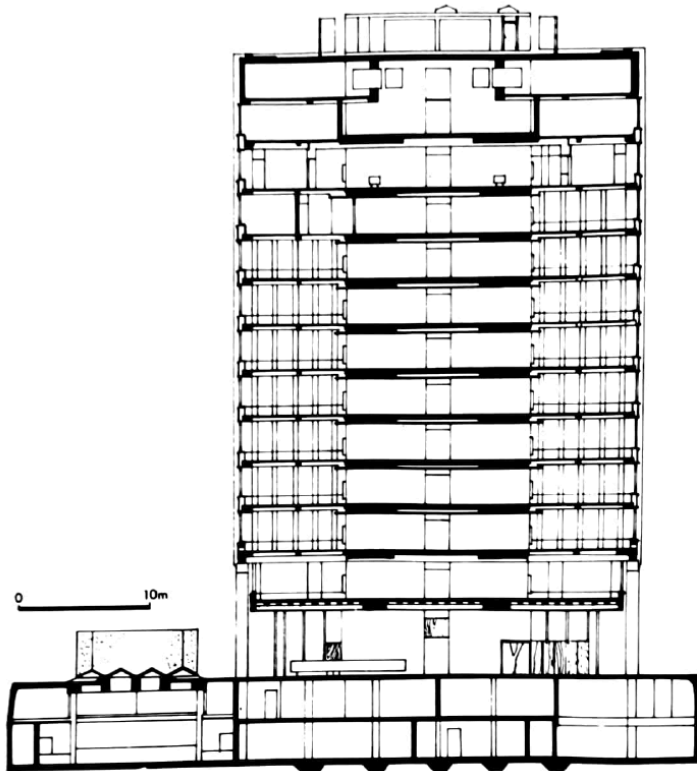


Figure 15. Section showing exceptionally thin floor slabs and pyramidal skylights over the cafeteria.

Source: Library of Contemporary Architects, *Paul Rudolph*, Simon and Schuster, New York, 1971.

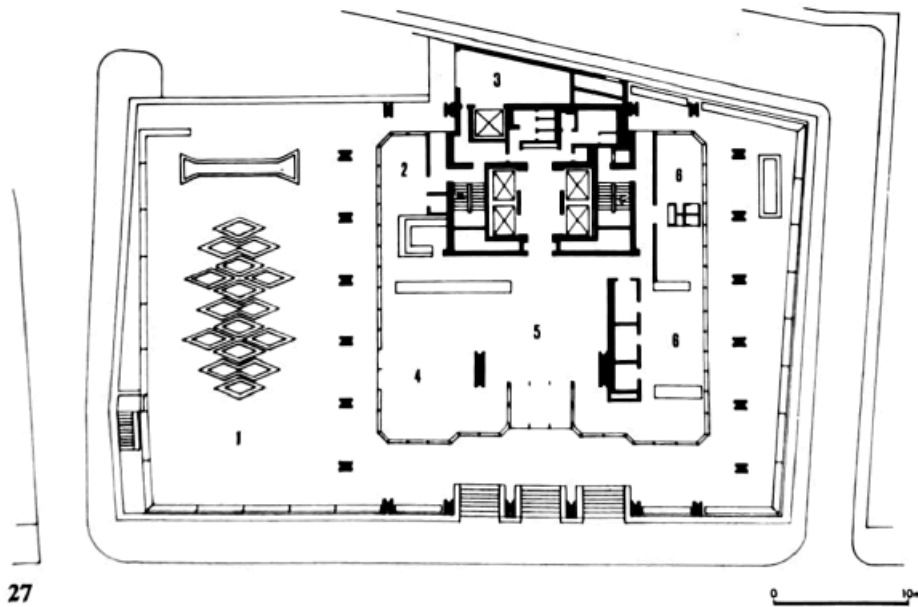


Figure 16. Ground plan showing: 1. public open space; 2. foyer; 3. goods entrance; 4. reception area; 5. entrance hall; and 6. shop units.

Source: Library of Contemporary Architects, *Paul Rudolph*, Simon and Schuster, New York, 1971.

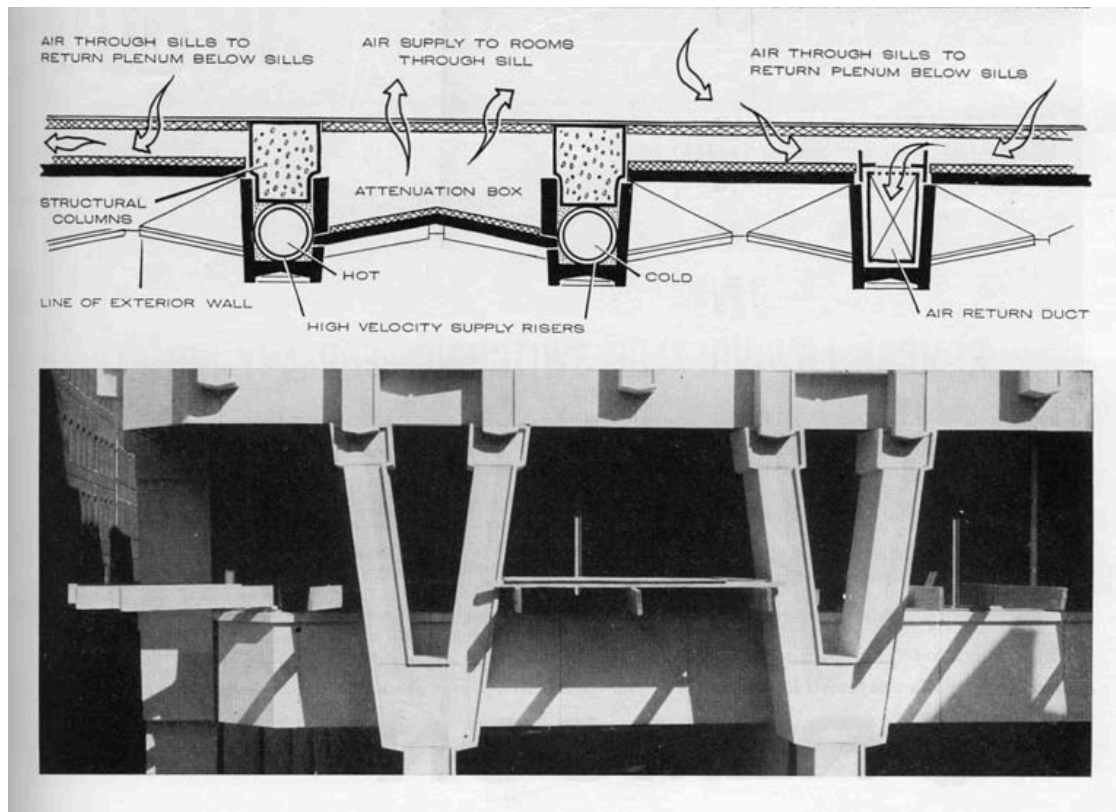


Figure 17. Diagram explaining the integration of heating and cooling services within structure.

Source: *Progressive Architecture*, April 1960.



Figure 18. Boston, Blue Cross Blue Shield Building entrance, Paul Rudolph. Fay Foto Service, 1960.

Source: Boston Public Library, Boston Pictorial Archive.
<https://ark.digitalcommonwealth.org/ark:/50959/p841cb410>



Figure 19. View of exterior plaza showing pyramidal crystalline skylights for the cafeteria below. Photo by Joseph Molitor.

Source: Avery Architectural and Fine Arts Library, Columbia University



Figure 20. Boston, Blue Cross Blue Shield Building, exterior, Paul Rudolph. Fay Foto Service, 1960.

Source: Boston Public Library, Boston Pictorial Archive.
<https://ark.digitalcommonwealth.org/ark:/50959/63960042p>



Figure 21. Blue Cross Blue Shield Building entrance. Fay Foto Service, ca. 1957-1961.

Source: Boston Public Library, Boston Pictorial Archive.
<https://ark.digitalcommonwealth.org/ark:/50959/1v53nq60r>



Figure 22. Blue Cross Blue Shield Building exterior. Fay Foto Service, ca. 1957-1961.

Source: Boston Public Library, Boston Pictorial Archive.
<https://ark.digitalcommonwealth.org/ark:/50959/n5841j898>

3.0 SIGNIFICANCE

3.1 Historic Significance

The Blue Cross Blue Shield Building at 133 Federal St. was commissioned by the Blue Cross Blue Shield Corporation (BCBSC). Blue Cross, established in 1937, was the first Massachusetts insurer to allow its patients to prepay for hospital care. Blue Shield, established 5 years later, became the first Massachusetts insurer to offer prepaid coverage for physician visits. By the 1950s, BCBSC had over 2 million subscribers and was in need of larger office space for clerical workers to support its growing network of subscribers.⁹ BCBSC had decided against moving to the suburbs and opted to move from its previous location on Milk Street to a larger site on Federal Street, citing tax benefits and staffing needs as reasons to remain in Boston. The majority of its 800 clerical workers were unmarried, city-dwelling women who required public transportation and retail options nearby, making the property on Federal Street attractive.

In the years immediately preceding the creation of Medicaid and Medicare in 1965, the Massachusetts health services system was highly decentralized and people across the state often experienced inconsistencies when seeking state benefits.¹⁰ Given these challenges, BCBSC's decision to design a new Massachusetts headquarters in downtown Boston was also an opportunity for the company to promote itself as progressive and dedicated to providing much needed access to affordable healthcare. As a young architect who was part of the next generation of American modernists, following aging architectural giants including Mies van der Rohe and Walter Gropius, Paul Rudolph was an ascendent and cutting-edge choice. He was selected as architect for the building in 1956, together with Anderson, Beckwith & Haible, a firm he had recently collaborated with on the Wellesley College Jewett Arts Center in Wellesley, Massachusetts. Rudolph, who had been seeking a commission with the feel of a European piazza, was intrigued by the site's history, as the cramped and crooked Federal Street dated back to the 18th century and the dense urbanism of the area was as close to European as could be found in America. Documentation of the building site from 1867 shows it had been occupied by a row of five-story brick buildings where wool and leather clothing was manufactured, stored, and sold. By the 1930s, most of these buildings had been converted to office space, with the most recent tenants being George DeBlois and his heirs (137-141 Federal St.) and the Edward Bass Electric Company (133 Federal St.).^{11 12}

The 1950s were challenging for the city of Boston. With the migration of the city's middle-class families to the suburbs following World War II, Boston saw a population reduction from approximately 800,000 to 700,000 from 1950 to 1960. Companies were also moving out of the city to the suburbs, and Boston's jobs declined from 562,000 in 1947 to 537,000 in 1963. Retail sales fell 5 percent in the 1950s. The city raised taxes because of this revenue decline, creating a negative cycle that caused more residents to leave, which further impacted the city's economy. To exacerbate

⁹ Blue Cross, "About Us: More than 80 years of standing up for members," <https://www.bluecrossma.org/aboutus/company-history#:~:text=In%201937%20Blue%20Cross%20opens,to%20prepay%20for%20hospital%20care.>

¹⁰ National Study Service, *Meeting the Problems of People in Massachusetts: A Study of the Massachusetts Public Welfare System* (Boston, 1965), 43.

¹¹ City of Boston, Application for Permit to Alter Elevator, Building Permit No. 1297, Sept 2, 1952.

¹² City of Boston, Form 57A, Building Permit No. 3490, Oct 13, 1939.

Boston's challenges, the reputation for graft and corruption by the local political presence was affecting the city's ability to secure funding for renewal projects.¹³

Mayor John B. Hynes was elected in 1949 under the promise of a new, restructured Boston free from corruption. He improved the city government's relationships with the business community and began a series of urban renewal projects meant to improve the city's housing stock and "begin anew": the New York Streets Initiative in the South End, the creation of the Central Artery, and the West End development plan. Hynes formed the Boston Redevelopment Authority (BRA) in 1957 to oversee all the city's renewal projects, though the poor outcome from the West End project nearly caused the BRA to be terminated.¹⁴ John F. Collins succeeded Hynes as mayor in 1959 and continued the urban renewal goals set by his predecessor. In 1960, he hired planner Edward J. Logue as development administrator of the BRA and together they worked to rebuild Boston throughout the 1960s.

The Blue Cross Blue Shield Building was completed in 1960 as Boston's urban renewal program was beginning to solidify. While not a direct product of the initiative, its completion at the beginning of the movement, and its presence just a few blocks from Government Center, set the stage for the flurry of Brutalist buildings that would rise in Boston's civic center over the next decade. The John F. Kennedy Federal Building (Walter Gropius), Boston City Hall (Kallmann and McKinnell), Government Services Center (Paul Rudolph), and One Center Plaza (Welton Beckett and Associates) were just some of the hallmark projects of this formative period in Boston's architectural history.

3.2 Architectural (or Other) Significance

The Blue Cross Blue Shield Building was one of the first large-scale buildings in the Brutalist style designed by architect Paul Rudolph, and noteworthy as one of his large-scale, public, commercial commissions that served as an antecedent to the many high-rise buildings he would design later in his career, including those in Southeast Asia. It is also one of only three, and the oldest, Rudolph buildings in Boston. Rudolph was born in 1918 and studied Modernism under Walter Gropius at Harvard's Graduate School of Design in the 1940s. His early career was inspired by his experience using modern shipbuilding materials at the Brooklyn Navy Yards, resulting in creative designs for residences that pushed the boundaries of contemporary architecture and engineering.¹⁵ As his commissions became more significant in the late 1950s and early 1960s, Rudolph found new ways to advance modern architecture by reconciling structural rationalism with concern for historical and environmental context. These philosophies were employed in thoughtful and impactful ways in the Blue Cross Blue Shield Building.

Rudolph sought to redefine Modernism, renouncing the stark, angular façades common in the International Style and developing his own design philosophies that brought Brutalism to the forefront of American architectural discourse in the 1960s and 1970s. Many of these nascent philosophies were present in the Blue Cross Blue Shield Building, the design of which allowed

¹³ Brian Sirman, "Concrete Changes: Architecture, Politics, and the Design of Boston City Hall," Amherst: Bright Leaf, 2018, 8-9.

¹⁴ *Ibid.*, 16-23.

¹⁵ Library of Contemporary Architects, "Paul Rudolph" with introduction by Rupert Spade. New York: Simon and Schuster, 1971, 11-12.

Rudolph to begin developing solutions to the problems he saw in the Modern buildings of his contemporaries, joining architectural greats such as Auguste Perret, Le Corbusier, and Eero Saarinen in opposing the monotonous, ahistoric, reflective glass curtain walls. Instead, Rudolph promoted exploring the use of concrete, specifically customized Mo-Sai textured precast concrete cladding panels with exposed white quartz aggregate, to make legible the structural tactics of the building and to create depth, rhythm, and texture in an expressive exterior that connected with surrounding building fabric and stimulated the imagination of the pedestrian viewer. The consistent use of a limited material palette is a signature of Rudolph's architecture, as he felt that an excess of materials was a sign of a weak design.¹⁶

While he appreciated Gropius' interest in the intersection of architecture, society, and technology, Rudolph found the Bauhaus focus on functionalism and machine-produced buildings to be unsatisfactory.¹⁷ He was drawn to the expressive, regionally inflected modernism of Frank Lloyd Wright, whom he would call "the greatest American architect," and he was interested in the ways that historic buildings related to each other and nature.¹⁸ He began to experiment with these ideas during his time as an architect in Sarasota, Florida, in the early 1950s, where he worked with Ralph Twitchell to design regionally adapted houses for the tropical, and often harsh, climate. Twitchell and Rudolph's buildings made extensive use of concrete and new passive building technologies, including vented masonry walls and counterbalanced shutters, and their focus on ways to promote harmony between man, nature, and regional architecture in Sarasota became known as the "Sarasota School." Influenced by Perret's Le Havre, Rudolph began using concrete framing to integrate the structural and mechanical systems in his design of the Sarasota Senior High School, completed in 1958.¹⁹ Around this time, he was also inspired by the BBPR Architecture Group's Torre Velasca; Rudolph abstracted and refined the historic, archetypal architectural forms into a modernist vocabulary, using Y-shaped supports found in the Doge's Palace in Venice in one of his early designs of the Jewett Arts Center at Wellesley College (1958) in Wellesley, Massachusetts.²⁰ While this design iteration was ultimately rejected for that building, Rudolph returned to those Y-shapes throughout his career, referring to them as "symbols of structure," alluding to the way contemporary architectural theory was trending towards deception. Rudolph sought a design movement towards structural rationalism through the use of functional decorative elements that also expressed how the building was being supported.²¹

Rudolph would take all of these concepts and refine them to inform his design of the Blue Cross Blue Shield Building. He perfected the use of precast concrete framing, ultimately creating precast columns with a precision and elegance resembling traditional ashlar.²² He established a relationship between old and new by selecting and abstracting specific qualities from neighboring buildings, such as the chamfered corners adapted from the four-story building to the south. Rudolph also used a large white aggregate in his concrete cladding panels to echo the rough texture of the surrounding masonry buildings, and based the 4-by-7-foot window dimensions of the Blue Cross Blue Shield

¹⁶ Paul M Rudolph, "The Essence of Architecture Is Space," *House and Garden*, 1969, 31-32.

¹⁷ Paul Rudolph, "Six Determinants of Architectural Form," *Architectural Record* 120, October 1956, 183-90.

¹⁸ Paul Rudolph, "Excerpts from a Conversation," *Perspecta* 22, 1986, 102-7.

¹⁹ *Library of Contemporary Architects*, "Paul Rudolph," 13.

²⁰ Timothy M. Rohan, "Challenging the Curtain Wall: Paul Rudolph's Blue Cross and Blue Shield Building," *Journal of the Society of Architectural Historians*, Vol. 66, No. 1 (March 2007), 97-98.

²¹ Paul Rudolph, "The Changing Philosophy of Architecture," *Architectural Forum* 101 (July 1954).

²² Timothy M. Rohan, "Challenging the Curtain Wall," 101.

Building on the dimensions of existing windows in nearby buildings.²³ He returned to the Y-shaped support columns from the Doge's Palace, incorporating them into the façade as expressive symbols of structure that were also functional, carrying the heating and cooling ductwork for the building, and also denoting the locations of the structural steel beams behind them which form the true structural support for the building. Indeed, it was this interest in synthesizing references to architectural history and modern technology that led Philip Johnson to extol the Blue Cross Blue Shield Building as an early repudiation of the International Style.²⁴ While not true structural components, these Y-shaped piers helped Rudolph to develop his structural rationalism philosophy, becoming "a dialectical membrane of structure and meaning" that would inspire and inform future architectural works.²⁵ Rudolph would later employ these same philosophies in his designs of notable works such as the Art and Architecture Building at Yale University (1964) and the Boston Government Services Center (1967).

While many have lauded Rudolph's vision and the direct challenge it made to the status quo, he was heavily criticized for the building as well. Many misunderstood the nonstructural piers' efforts at structural rationalism as "purely aesthetic" and "lacking in structural clarity."²⁶ The building became one of the most controversial office structures in the United States at the time, sparking debates about the merits of reflective curtain walls vs. sculptural play with light and shadow. Rudolph himself was ambivalent about the building after it was completed, feeling it was ill-proportioned. However, the materials, principles, and integrated systems used in the Blue Cross Blue Shield Building would inspire other architects to design open-plan skyscrapers across the country throughout the following decade, becoming "a standard part of the American construction vocabulary."²⁷ The partial and complete demolition of Rudolph's Shoreline Apartments in Buffalo, New York; Orange County Government Center in Goshen, New York; and the Burroughs Wellcome corporate headquarters in North Carolina (the Elion-Hitchings Building in Research Triangle Park, North Carolina), increases the significance of the Blue Cross Blue Shield Building as an extant exemplar of his oeuvre.

3.3 Archaeological Sensitivity

Downtown Boston is archaeologically sensitive for ancient Native American and historical archaeological sites. There are possibilities 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 to be 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.

²³ Ibid, 93.

²⁴ Ibid, 104.

²⁵ Ibid, 98.

²⁶ "Boston Bucks a Trend," *Architectural Forum* 113 (Dec. 1960), 64-69.

²⁷ Timothy M. Rohan, "Challenging the Curtain Wall," 106.

3.4 Relationship to Criteria for Designation

The Blue Cross Blue Shield Building at 133 Federal St. 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 the National Register of Historic Places as provided in the National Historic Preservation Act of 1966.

The Blue Cross Blue Shield Building is not on the National Register. However, as part of the Boston Landmarks Commission's 2009 survey update of cultural and architectural resources in Boston's Central Business District, 133 Federal St. is considered eligible for listing on the National Register of Historic Places under Criteria A and C at both the local and state levels. The building retains integrity of location, design, setting, materials, workmanship, feeling and association.

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 that 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.

The Blue Cross Blue Shield Building is an integral part of Boston's history of urban renewal and shift toward the construction of public architecture in the Brutalist style under the desire to create a "New Boston." As one of Boston's earliest Brutalist buildings, it helped to set the stage for a stylistic shift that helped revitalize Boston's downtown and create a more progressive city both politically and culturally.

C. 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.

The Blue Cross Blue Shield Building helped define Paul Rudolph's early design philosophies, which then guided his career, namely Structural Rationalism and Contextualism. Rudolph was a leading voice in the American Brutalism movement and the Blue Cross Blue Shield Building was conceived and received as a direct challenge to the competing International style of Modernism popular in the 1950s. Rudolph would go on to design the Boston Government Services Center less than a decade later, elaborating upon his previous studies on the psychology of space and the expressiveness of concrete as a building material to create one of his most renowned and monumental works.

4.0 ECONOMIC STATUS

4.1 Current Assessed Value

According to the City of Boston's Assessor's records, the property at 133 Federal St. (parcel #0304206000) where the Blue Cross Blue Shield Building is located has a total assessed value of \$43,190,200.00, with the land valued at \$14,278,400.00 and the building valued at \$28,911,800.00 for fiscal year 2023.

4.2 Current Ownership

According to the City of Boston's Assessor's records, the Blue Cross Blue Shield Building is owned by BE Realty Limited Partnership, with a mailing address at 89 Pleasant Street S, Natick MA 01760.

5.0 PLANNING CONTEXT

5.1 Background

The Blue Cross Blue Shield Building was originally built for the Blue Cross Blue Shield Corporation (BCBSC). In 1975, the building was sold to State Street Bank and Trust Company, who immediately leased it to the Union Warren Savings Bank. In 1987 it sold to the First National Bank of Boston, and in 1994 to its current owner, BE Realty Limited Partnership, an affiliate of Trans National Group, with a mailing address at 89 Pleasant Street S, Natick, MA 01760.²⁸ Throughout the building's existence, it has remained in use as an office building, with commercial space on the ground floor.

5.2 Zoning

Parcel number 0304206000 is located in the Boston Proper zoning district, in a B-10 General Business subdistrict allowing where Planned Development Areas (PDA) are allowed, and in the Restricted Parking Overlay District.

5.3 Planning Issues

On May 31, 2016, a petition to landmark the Blue Cross Blue Shield Building was submitted by a BLC commissioner. On June 14, 2016, the BLC voted to accept 133 Federal St. for further study.

The current owners of 133 Federal St. submitted an Article 85 application on February 14, 2007. On March 13, 2007, the Boston Landmarks Commission found the property to be significant and imposed a 90-day demolition delay until June 11, 2007. Subsequently, the owners, the Trans National Group, made the decision to preserve the building.

The building location is included in two current planning initiatives by the Boston Planning and Redevelopment Agency (BPDA). The first is an active BPDA program that offers significant tax credits to owners who convert vacant office space into housing. The office-to-housing-conversion pilot program opened in October 2023 to address a post-COVID-19 pandemic real estate glut that reduced downtown office space rentals; the program responds to the city's need for increased housing.²⁹

The second is a planning study called PLAN:Downtown, adopted by the BPDA Board in December 2023 "to develop a new framework for the preservation, enhancement, and growth of the Downtown area of the City of Boston, while balancing the importance of livability, daylight, walkability, climate change, access to open space, affordability, and a dynamic mix of uses, among others."³⁰

The recently completed 53-story Winthrop Square project adjacent to 133 Federal St. provides massing and scale contrast, and a snapshot of Boston building technology innovation spanning 70 years.³¹

²⁸ Suffolk County Registry of Deeds, <https://www.masslandrecords.com/suffolk/>

²⁹www.bostonplans.org/news-calendar/news-updates/2023/10/17/bpda-officially-launches-office-to-residential-con. Accessed November 13, 2023.

³⁰ Boston Planning and Development Agency: Plan Downtown

<https://www.bostonplans.org/planning/planning-initiatives/plan-downtown>. Accessed November 13, 2023.

³¹Boston Planning and Development Agency: 115 Winthrop Square

<https://www.bostonplans.org/projects/development-projects/115-winthrop-square>. Accessed November 13, 2023.

6.0 ALTERNATIVE APPROACHES

6.1 Alternatives available to the Boston Landmarks Commission

A. Designation

The Commission retains the option of designating the Blue Cross Blue Shield Building at 133 Federal St. as a Landmark. Designation shall correspond to Assessor's parcel #0304206000 and shall address the following exterior elements hereinafter referred to as the "Specified Features":

- The exterior envelope of the building.
- Certain landscape elements including: The plaza and its topography, and the fountain on the western edge of the plaza.

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.

D. Preservation Plan

The Commission could recommend development and implementation of a preservation and adaptive reuse 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 Blue Cross Blue Shield 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 Blue Cross Blue Shield Building could be listed on the National Register of Historic Places. Listing on the National Register provides an honorary designation and limited protection in cases when federal funds are involved in proposed physical changes. It also creates incentives for preservation, such as tax incentives for income-producing properties and possible eligibility for grants through the Massachusetts 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 Blue Cross Blue Shield Building could be introduced at the site.

7.0 RECOMMENDATIONS

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

1. That the exterior of the Blue Cross Blue Shield Building at 133 Federal St. 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 Assessor's parcel #0304206000 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.³² 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. The Commission will evaluate any proposals to adapt the property to contemporary needs according to guidelines set forth below to ensure compatibility with character-defining features.

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 that 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. Activities that are not subject to review by the Commission:

³² 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.

1. Activities associated with normal cleaning and routine maintenance. *Please note: this section does not include the character-defining exterior Mo-Sai precast cladding panels with exposed white quartz aggregate.*
 - 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 that 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 that 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.³³ 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.

³³ 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 original or later contributing materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved. This includes the character-defining exterior Mo-Sai precast cladding panels with exposed white quartz aggregate.
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 impact of the 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 minimize removal of 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 should be preserved. This is not intended to preclude replacement of signage identifying building tenants or occupants.
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 the stone, brick, terra cotta, concrete, and mortar)

1. All original or later contributing masonry materials shall be preserved. This includes the character-defining feature of the Mo-Sai precast cladding panels with exposed white quartz aggregate.
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 should be replaced with materials and elements which match the original in material, color, texture, size, shape, profile, and detail of installation. Alternative materials will be considered on a case-by-case basis.
4. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
5. Sound original mortar shall be retained.
6. Deteriorated mortar shall be carefully removed by hand raking the joints.
7. Use of mechanical hammers may be allowed on a case-by-case basis.
8. Repointing mortar shall duplicate the original mortar in strength, composition, color, texture, joint size, joint profile, and method of application.
9. Sample panels of raking the joints and repointing shall be reviewed and approved by the staff of the Boston Landmarks Commission.
10. Cleaning of masonry is discouraged and should only be performed when necessary to halt deterioration.
11. If the building is to be cleaned, the masonry shall be cleaned with the gentlest method possible.
12. 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).
13. 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.

14. Waterproofing or water repellents are discouraged. These treatments can cause permanent damage. The Commission does recognize that their use may be required to solve a specific problem. Samples of any proposed treatment shall be reviewed by the Commission before application.
15. 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.
16. 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.
17. 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.
18. Deteriorated adobe shall be repaired by using mud plaster or a compatible lime-plaster adobe render, when appropriate.
19. 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.
20. 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 should 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 should be replaced with material and elements which match the original in material, color, texture, size, shape, profile, and detail of installation. Alternative materials will be considered on a case-by-case basis.
4. When replacement of materials is necessary, it should be based on physical or documentary evidence.
5. Cleaning of wood elements shall use the gentlest method possible.
6. 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.

7. Damaged or deteriorated paint should be removed to the next sound layer using the mildest method possible.
8. 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.
9. 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 should be replaced with material and elements which match the original in material, color, texture, size, shape, profile, and detail of installation. Alternative materials will be considered on a case-by-case basis.
4. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
5. Cleaning of metal elements either to remove corrosion or deteriorated paint shall use the gentlest method possible.
6. 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.
7. 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.
8. 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.
9. 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).

10. 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.
11. 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. Removal of window sash for HVAC ventilation panels shall not be allowed.
5. If the Commission approves of the replication of the historic appearance of the original windows, then replacement windows may be installed for the purpose of energy efficiency. The replacement window must be constructed of appropriate matching material, color, texture, size, shape, profile, configuration, and detail of installation. Alternative materials may be considered on a case-by-case basis.
6. If the Commission approves of the replication of the historic appearance of the original windows and the compatibility of the new proposed configuration, then the configuration of each individual original window may be altered for the purposes of operability. Changes to window configuration will be made on a case-by-case basis.
7. If and when presented, tinted or reflective-coated glass intended to improve energy efficiency shall be considered on a case-by-case basis.
8. Storm windows are not appropriate for application on this building.
9. Shutters are not appropriate for application on this 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 should 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 (functional and decorative), details, and ornamentation should be replaced with material and elements that match the original in material, color, texture, size, shape, profile, configuration and detail of installation. Alternative materials will be considered on a case-by-case basis.
6. When replacement is necessary, it should be based on physical or documentary evidence.
7. Original or later contributing entrance materials, elements, features (functional and decorative) and details shall not be sheathed or otherwise obscured by other materials.
8. 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.
9. Unfinished aluminum storm doors shall not be allowed.
10. Replacement door hardware should replicate the original or be appropriate to the style and period of the building.
11. Buzzers, alarms and intercom panels, where allowed, shall be flush mounted and appropriately located.
12. 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 should be replaced with material and elements that match the original in material, color, texture, size, shape, profile, configuration and detail of installation. Alternative materials will be considered on a case-by-case basis.
4. When replacement is necessary, it should be based on physical or documentary evidence.

5. 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.
6. 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 fixture materials, elements, features (functional and decorative), details, and ornamentation should be replaced with material and elements that match the original in material, color, texture, size, shape, profile, configuration, and detail of installation. Alternative materials will be considered on a case-by-case basis.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. 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.
6. Supplementary illumination may be added where appropriate to the current use of the building.
7. 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 that date from an interim installation and are considered to be appropriate to the building and use.
 - d. New lighting fixtures that are differentiated from the original or later contributing fixture in design and that illuminate the exterior of the building in a way that renders it visible at night and compatible with its environment.

8. The location of new exterior lighting shall fulfill the functional intent of the current use without obscuring the building form or architectural detailing.
9. No exposed conduit shall be allowed on the building.
10. Architectural night lighting is encouraged, provided the lighting installations minimize night sky light pollution. High efficiency fixtures, lamps and automatic timers are recommended.
11. 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 forms and, to the extent visible from public ways, 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 that 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. The visibility of new roof projections from the public way shall be minimized.
2. New mechanical equipment should be reviewed to confirm that its visibility is minimized to the extent possible.

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 updated 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 and its setting.

8.3.14 Accessibility

1. Alterations to the existing building and site 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 the following document: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation

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 Building Site

1. The general intent is to preserve the existing or later contributing site and landscape features that enhance the property.
2. It is recognized that often the environment surrounding the property has character, scale and street pattern quite different from what existed when the building was constructed. Thus, changes must frequently be made to accommodate the new condition, and the landscape treatment can be seen as a transition between the historic property and its newer surroundings.
3. All original or later contributing features of the building site that are important in defining its overall historic character shall be retained and, if necessary, repaired using recognized preservation methods. This may include but is not limited to walls, fences, steps, walkways, paths, roads, vegetation, landforms, furnishings and fixtures, decorative elements, and water features. (See Section 9.0 for subsurface features such as archaeological resources or burial grounds.)
4. Deteriorated or missing site features should be replaced with material and elements that match the original in material, color, texture, size, shape, profile, configuration and detail of installation. Alternative materials will be considered on a case-by-case basis.
5. When replacement is necessary, it should be based on physical or documentary evidence.
6. The existing landforms of the site shall not be altered unless shown to be necessary for maintenance of the designated property’s structure or site.
7. If there are areas where the terrain is to be altered, these areas shall be surveyed and documented to determine the potential impact to important landscape features.

8. The historic relationship between the building and the landscape shall be retained. Grade levels should not be changed if it would alter the historic appearance of the building and its relation to the site.
9. Building should not be relocated if it would diminish the historic character of the site.
10. When they are required by a new use, new site features (such as parking areas, driveways, or access ramps) should be as unobtrusive as possible, retain the historic relationship between the building and the landscape, and be compatible with the historic character of the property.
11. Original or later contributing layout and materials of the walks, steps, and paved areas should be retained to the extent possible. Consideration will be given to alterations if it can be shown that better site circulation is necessary and that the alterations will improve this without altering the integrity of the designated property.
12. When they are necessary for security, protective fencing, bollards, and stanchions should be as unobtrusive as possible.
13. Existing healthy plant materials that are in keeping with the historic character of the property shall be maintained. New plant materials should be appropriate to the character of the site.
14. Maintenance of, removal of, and additions to plant materials should consider restoration of views of the designated property.
15. The Boston Landmarks Commission recognizes that the designated property must continue to meet city, state, and federal goals and requirements for resiliency and safety within an ever-changing coastal flood zone and environment.

8.3.17 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. When reviewing an application for proposed alterations, the Commission will consider whether later addition(s) and/or alteration(s) can, or should, be removed on a case-by-case basis. 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:

1. **Architectural style:** Brutalist
2. **Ornamentation:** Precast concrete Y-shaped piers, upper columns and spandrels
3. **Building materials and finishes:** Precast Mo-Sai concrete panels with large white quartz aggregate
4. **Roof type, forms, and features:** flat roof surrounded by a concrete cornice and not visible from a public way.
5. **Cornices:** Concrete cornice punctuated by precast concrete columns, which ascend until they have just passed the top of the cornice
6. **Doors and windows:** The double-leaf glass doors of the main entrance in the façade are original; all-glass walls and windows on levels 1 and 2; single pane vertical glass windows, 183”h x 57”w, separated by the continuous 3” vertical precast steel channels and concrete columns acting as mullions
7. **Steps and/or stoops:** Three sets of eight steps leading up to plaza (ground) level at Federal Street entrance. Small stairway and ramp on the Milton Place side of the plaza.
8. **Lobby:** Two non-original commercial spaces exist inside the lobby, which was originally designed as a wide open space. Later non-character-defining improvements include the multiple non-original exterior entrances from the commercial spaces.
9. **Visible elements of structural systems (columns, beams, trusses, etc.):** Steel structural columns are hidden, but articulated by precast concrete columns in the spirit of Structural Rationalism
10. **Massing of building:** Rectangular verticality with chamfered corners.
11. **Relationship of building to lot lines, sidewalks, and streets:** Building sits on a raised platform supported by concrete skirt walls, maintaining the street wall that is common in the Central

Business District. The basement level of the building cover the entire lot and provide the platform for the 13-story tower above.

12. **Plaza:** Privately owned and publicly visible open space, which is set above the street level on a pediment located at the South side of the building facing Federal Street. The open space plaza was original to Pauls Rudolph's building design but the original glass pyramidal skylights have been removed. Currently, the plaza is paved in stone and contains large metal planters with small trees. There is an existing non-original exterior handicap ramp up to the plaza. The plaza area is defined by non-original metal railings which continue around the entire building at the lobby level. The Mo-Sai panels existing on three sides of the plaza vent wall are original; the water feature and granite panels are a later, non-original addition, as are the pavers and metal planters.
13. **Topography and landforms:** The precast panels covering the skirt walls were designed by Rudolph and made from the same Mo-Sai concrete as the main structure. The panels contain a subtle pattern that references the lines of the Y-shaped piers.
14. **Lighting:** The recessed ceiling lights outside of the first-floor entrance off Federal Street are original to Rudolph's design. However, the pole lights on the plaza are not original.

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 who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

Though the property has been in near-constant use since the 17th century, and likely many centuries before, the archaeological integrity and therefore archaeological sensitivity of the property remains uncertain. The presence of multiple large buildings with significant basements in the 19th century as well as the current building's sub-floors, which expand beyond the spaces visible on the first floor, may have erased previous archaeological sites in the area.

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.

11.0 BIBLIOGRAPHY

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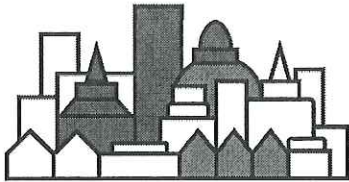
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12.0 ADDENDUM: See following pages for original petition.



Boston Landmarks Commission

LANDMARK PETITION FORM

FOR BLC USE ONLY
DO NOT WRITE OR STAMP IN THIS BOX

Petition number: 255.16

Received on: 05/31/2016

Attest:
Rozanne Foley
Executive Director

Schedule for preliminary hearing:
06/14/2016

City of Boston
The Environment
Department

Boston City Hall, Room 709
Boston, Massachusetts 02201
617-635-3850

Note: This petition must be completed in full in order to be accepted and scheduled for a preliminary hearing. *The petition may be returned if all questions have not been answered completely.* Type or print legibly. Please contact BLC staff if you have any questions regarding the petition process.

PETITION

We, ten undersigned voters of the City of Boston, petition the Boston Landmarks Commission as authorized by Chapter 772 of the acts of 1975 of the Commonwealth of Massachusetts, as amended.

TO DESIGNATE

TO AMEND THE DESIGNATION OF

TO RESCIND THE DESIGNATION OF

THE FOLLOWING:

133 Federal Street, Boston, MA 02110

(street address, neighborhood, and zip code, and street boundaries if District or Protection Area)

Blue Cross-Blue Shield Building

(name, historic and/or common)

PROPERTY OWNER'S NAME AND MAILING ADDRESS FROM ASSESSOR'S RECORDS:

NAME: B E Realty Limited Partnership

ADDRESS: 2 Charlesgate West, Boston, MA ZIP CODE: 02215

Ward 3, Parcel 0304206000

WARD AND PARCEL NUMBER FROM ASSESSOR'S RECORDS:

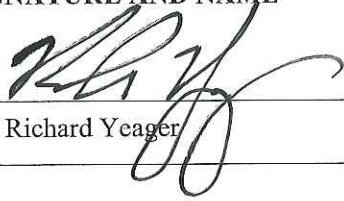
(The assessor's office is located on the 3rd floor of Boston City Hall. Assessing information is also available at <http://www.cityofboston.gov/assessing>, under the "Assessing On-line" option. A copy of the tax bill or list of owner(s) may be attached to the petition as necessary.)

We recommend the designation category to be: (check one; see instructions for details)

- LANDMARK (check one of the following) Exterior only Interior only Exterior and Interior
- LANDMARK DISTRICT ARCHITECTURAL CONSERVATION DISTRICT PROTECTION AREA

PETITIONERS must be residents and registered voters of the City of Boston.

Home Address and e-mail address (if applicable) must be provided for each petitioner; the petition may be returned if this information is incomplete. Names must be typed or printed legibly under the signature. It is advised to include more than ten petitioners in the instance that a name is illegible or a petitioner is not a registered voter. Attach additional copies of this page as necessary.

SIGNATURE AND NAME	ADDRESS	ZIP CODE	E-MAIL ADDRESS
1.  Richard Yeager	36 Gerald Road, Apt. 3, Brighton	02135	richard.yeager@bc.edu
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____

Spokesperson for the petitioners: Richard Yeager
Phone number: (770) 331-3862 E-mail: richard.yeager@bc.edu

SURVEY RATING CATEGORY AND SIGNIFICANCE

City of Boston Building Inventory Form #: **BOS.** 1725

Survey Rating Category (from Building Inventory Form): (check one)

- National Significance (formerly I. Highest Significance)
- State Significance (formerly II. Major Significance)
- Local Significance (formerly III. Significant)
- Contributing to a Historic District & May Contribute to a Historic District (formerly IV. Notable & V. Minor)
- Non-Contributing (formerly VI. Non-Contributing)

The Building Inventory form can be accessed online through the Massachusetts Cultural Resource Information System (MACRIS) at <http://http://mhc-macris.net/>, or by contacting BLC staff. In the absence of a Building Inventory Form or Survey Rating Category, please contact BLC staff with a request for a National Register of Historic Places Criteria Statement and survey rating category. **The BLC shall not accept petitions for buildings rated Local Significance, Contributing to a Historic District or May Contribute to a Historic District, and Non-Contributing (formerly III, IV, V and VI, or unrated).** In lieu of accepting petitions for buildings rated Local Significance and lower, the BLC shall invite petitioners or other parties to submit a letter requesting the Commission to review the rating and consider changing it. It shall be the obligation of anyone requesting a rating change to submit information that will assist BLC staff and the Commission with its review.

RESEARCH CHECKLIST

Please fill out the checklist below to indicate sources of information, if applicable. Check which resources were reviewed and include a citation, or indicate "N/A" if unable to locate. For information and guidance on researching, please visit the BLC's website at <http://www.cityofboston.gov/landmarks/resources.asp>.

- Historical maps/atlasses _____
- Historical images _____
- Building permits _____
- Deeds _____
- Probate records _____
- City directories _____
- Census records _____
- Obituaries _____
- Manuscripts/diaries/journals _____
- Newspaper/magazine articles See bibliography in survey form (BOS.1725) _____
- Books See bibliography in survey form (BOS.1725) _____
- Other Boston Landmarks Commission survey form (BOS.1725), updated 2009 _____

We recommend this action for the following reasons: *(Include architectural and/or historical significance from the Building Inventory Form and/or additional research materials, if available. Attach additional sheets as necessary.)*

The Blue Cross-Blue Shield Building at 133 Federal Street in Boston's Central Business/Financial District is significant for its associations with the mid-20th century renewal of Boston's financial district. It is also significant in Boston and the surrounding region as an exceptional architectural approach to structural design and expression in concrete, and as an outstanding example of the work of nationally-prominent architect Paul Rudolph. The building is Rudolph's first tall building, as well as his first modernist building in downtown Boston. Furthermore, it is the first free-standing modern structure built within Boston's Central Business/Financial District.

133 Federal Street is a thirteen-story commercial building constructed between 1958 and 1960. It is one of the earliest modern buildings in the Central Business/Financial District, distinguished by its experimental use of pre-cast concrete and its site design. The three-dimensional facade is a striking contrast to the metal-and-glass curtain wall skyscrapers that were typical in the 1950s. The building features a two-story base that is deeply recessed, consisting of a double-height ground level with all-glass walls, and a second story with a continuous strip of windows above a concrete spandrel. The Y-shaped columns at the base extend the full height of the building as faceted mullions, which frame single-pane vertical windows; concrete spandrels alternate between flat and angled panels. Projecting window sills are V-shaped in the horizontal dimension. The facades culminate in a tall band of solid concrete panels at the roofline. A single-story loading dock located on the west side of the building is clad with exposed aggregate concrete panels.

The ground floor of the building currently houses two restaurants and the main entrance to the office space in the upper levels. The main entrance is located on Federal Street, containing two pairs of double-leaf glass doors. The building is set above street level on a concrete-paved platform with metal railings and exposed aggregate concrete retaining walls. A fountain wall borders the west side of the intimately-scaled plaza, which occupies approximately a third of the total site. The plaza is carefully articulated and unusually located to the side rather than the front of the building, providing a small but welcome open space in the otherwise crowded district, and allowing the building to maintain the street wall that is characteristic of the Central Business/Financial District.

As part of the Boston Landmarks Commission's 2009 survey update of cultural and architectural resources in Boston's Central Business District, 133 Federal Street was considered eligible for listing on the National Register of Historic Places under Criteria A and C at both the local and state levels. The building retains integrity of location, design, setting, materials, workmanship, feeling and association.

For these reasons, the Blue Cross-Blue Shield Building at 133 Federal Street and the adjacent plaza that together comprise parcel 0304206000 are worthy of Landmark designation. This petition recommends that the Landmark designation be limited to the exterior of the Blue Cross-Blue Shield Building and the plaza (including but not limited to the fountain, vegetation, topography, and furnishings and objects).

REQUIRED ATTACHMENTS:

- 1. A location map must be submitted with the petition form. The outline of the building, structure, or site and its property boundaries (for proposed Landmarks), or the proposed District boundaries or Protection Area boundaries, must be clearly delineated.** Maps may be obtained digitally, via an online mapping site, or through the City of Boston's "Assessing On-line" function, available at <http://www.cityofboston.gov/assessing>. City of Boston Topographic and 100" Survey maps, available at the Boston Redevelopment Authority (BRA) on the 9th floor of Boston City Hall, may also be submitted.
- 2. Include photographs of the property or district petitioned.** High quality, color photographs are preferred.

**Instructions for Completing
Boston Landmarks Commission Petitions**

Follow these instructions when submitting a petition for a Landmark, Landmark District, Architectural Conservation District, or Protection Area. All sections of the petition must be completed in order for the Commission to accept the petition. **Prospective petitioners should contact Boston Landmarks Commission staff for assistance when submitting a petition.** For further information, see the Boston Landmarks Commission enabling legislation, Chapter 772 of the Acts of 1975 (sections 1 and 4), at <http://www.cityofboston.gov/landmarks>.

1. Check the "To Designate" line unless you know that the building, site, or area to which you refer is already designated by the Boston Landmarks Commission. Any change to an existing designation, such as enlarging or reducing its size (short of outright rescission), is an amendment; in such a case check the "To Amend the Designation Of" line.
2. A proposed individual Landmark is identified by its address and street, in addition to any commonly used name. Ward and precinct are also required to confirm the exact location of the proposed Landmark, Landmark District, Architectural Conservation District, or Protection Area.
3. Owners' names and addresses are available at the City of Boston Assessing Department (Boston City Hall, 3rd floor) or online at <http://www.cityofboston.gov/assessing>, via the "Assessing On-line" function. This information is mandatory for Landmark petitions. The Commission does not require addresses for proposed Landmark Districts, Architectural Conservation Districts, or Protection Areas; however, providing this information may speed up the designation process. If ownership has changed within the last 12 months, fill in information for new owner, if known.
4. The designation category for an individual building or site is "Landmark." To be considered for a Landmark designation, a property must have significance at the local level *and* at the state, New England region, or national level. To be considered for "Landmark District" designation, a district must have significance at the local level *and* at the state, New England region, or national level. A district will be considered for "Architectural Conservation District" status if its significance is at the local level. A "Protection Area" must be contiguous with an individual Landmark, Landmark District, or Architectural Conservation District and be visually related to the Landmark, Landmark District, or Architectural Conservation District and constitute an essential part of the physical environment of the individual Landmark, Landmark District, or Architectural Conservation District. A petition for the designation of a Protection Area will be considered only if an adjacent Landmark, Landmark District, or Architectural Conservation District has already been designated, or if a petition to designate an adjacent Landmark, Landmark District, or Architectural Conservation District accompanies the Protection Area petition.
5. Provide the City of Boston Building Inventory Form number and Survey Rating Category, if available. This information can be accessed online through the Massachusetts Cultural Resource Information System (MACRIS) at <http://http://mhc-macris.net/>, or by contacting BLC staff. In the absence of a Building Inventory Form or Survey Rating Category, contact BLC staff with a request for a National Register of Historic Places Criteria Statement and survey rating category. BLC staff will draft a National Register of Historic Places Criteria Statement form and will assign a rating within 30 days of receiving a written request. Please provide staff with any relevant information available that might assist in the preparation of the Criteria Statement and survey rating category.
6. Explain briefly the architectural and/or historical merit of the proposed Landmark, Landmark District, Architectural Conservation District, or Protection Area. Attach additional pages as necessary, but note that petitions marked only "See Attached" in this area will be returned.
7. A location map must be submitted with the petition form. The outline of the building, structure, or site and its property boundaries (for Landmarks), or the District boundaries or Protection Area boundaries, must be clearly delineated. Maps may be obtained digitally, via an online mapping site, or through the City of Boston's "Assessing On-line" function, available at <http://cityofboston.gov/assessing>. City of Boston Topographic and 100' Survey maps, available at the BRA on the 9th floor of Boston City Hall, may also be submitted.

8. Include photographs of the building, structure, site, or area petitioned. High quality, color photographs are preferred.
9. Petitioners must be current residents and registered voters of the City of Boston. Type or print the names of the petitioners under their signatures. There must be at least 10 petitioners; attach additional pages as necessary. Address, ward, and precinct must be included for all petitioners. The Secretary of the Commission must verify that all signers are registered Boston voters; this information, including a legible printed or typed name, is essential.
10. One petitioner should be selected to speak for all and to be available for contact in case the petition requires clarification. A phone number and email address must be provided for the spokesperson.

Please submit the completed petition to:

**Executive Director of the Boston Landmarks Commission
Boston City Hall, Room 709
Boston, MA 02201**

Petitions may not be submitted via fax or email.

The Boston Landmarks Commission will not accept a petition that does not have all sections completed, as noted previously. Any incomplete petition will be returned to the petitioners' spokesperson, who may then complete and resubmit the petition.

The Commission will hold a preliminary hearing with the petitioners to hear their reasons for proposing the designation. The petitioner or spokesperson for the petitioners is expected to attend the preliminary hearing and is encouraged to present the petition to the Commission. This brief hearing is held within 30 days of the Executive Director of the Commission's acceptance of the petition, and the petitioners and owner(s) of the petitioned property will be notified of it. Ordinarily, preliminary hearings take place at regular Commission hearings, held on the 2nd and 4th Tuesday of each month.

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston

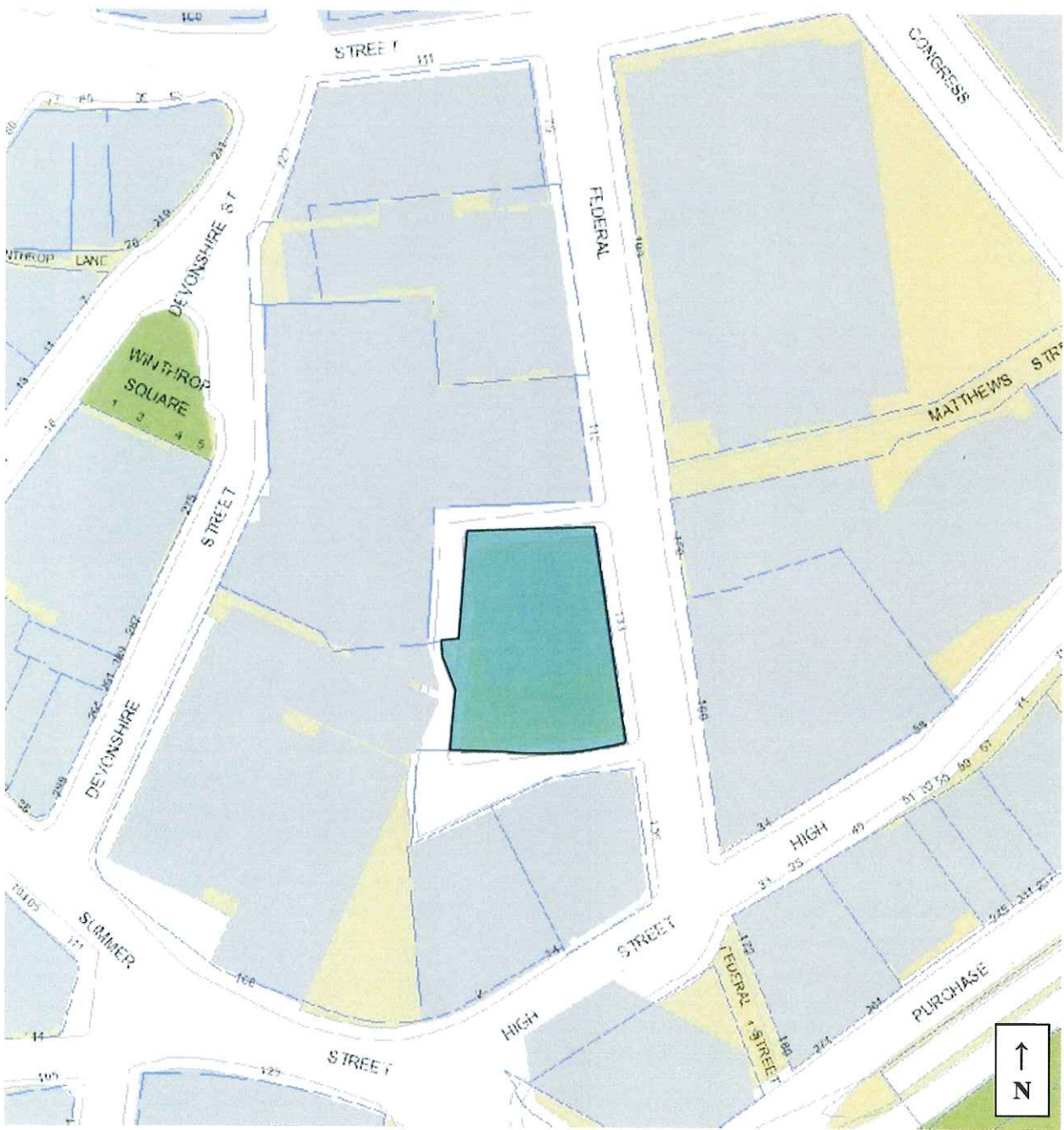


Figure # 1. Map showing the boundary of parcel 0304206000 at 133 Federal Street. The entire parcel is recommended for Landmark designation in this petition.

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston

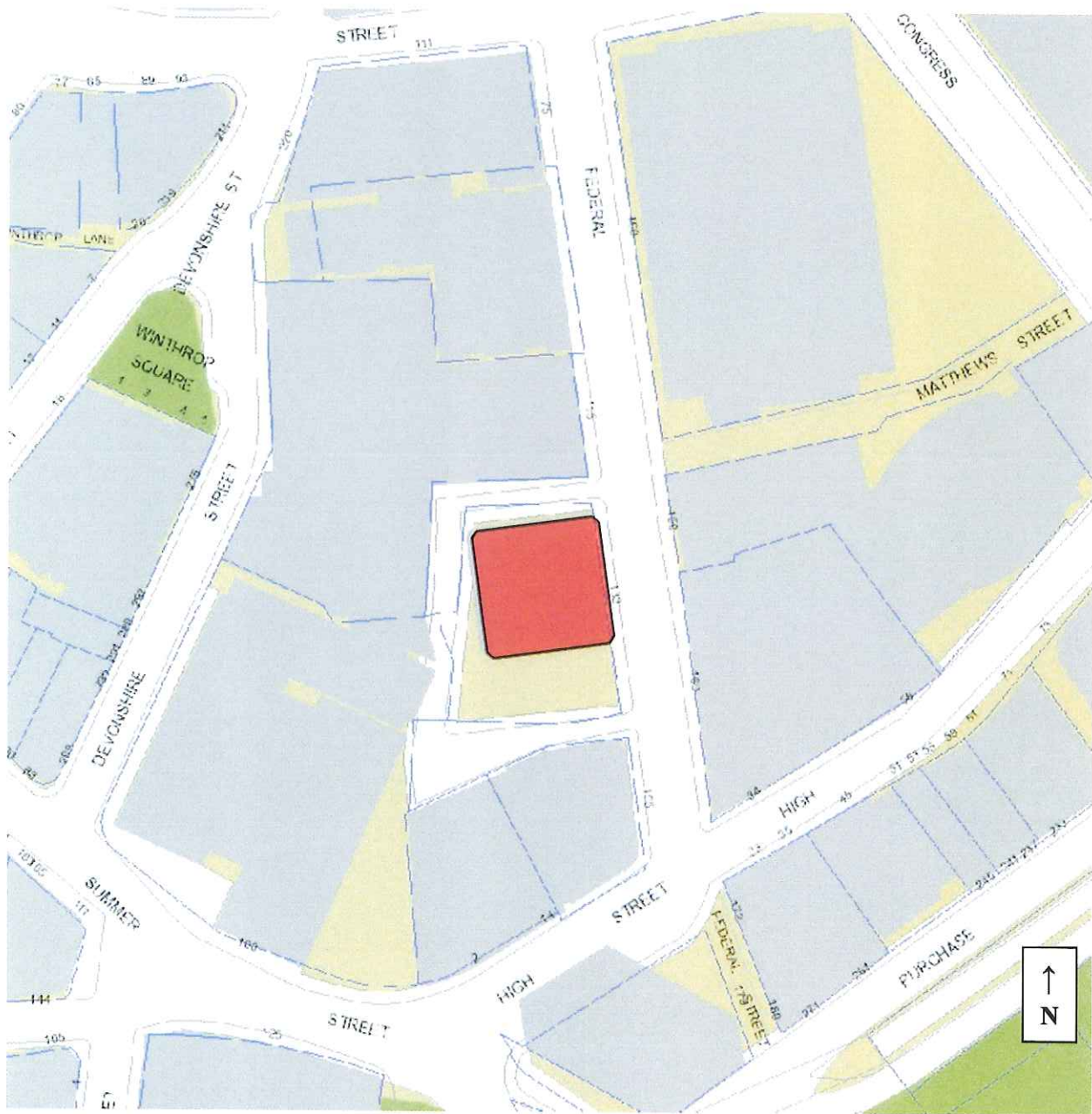


Figure # 2. Map showing the boundary of the Blue Cross-Blue Shield Building at 133 Federal Street, located on parcel 0304206000.

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston



Figure # 3. 133 Federal Street from Federal Street (view SW).

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston



Figure # 4. 133 Federal Street from Federal Street (view NW).

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston



Figure # 5. The west section of the plaza from Milton Place (view NW).

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston



Figure # 6. The east section of the plaza from Milton Place (view NE).

Landmark Petition Form – Attachments
Blue Cross-Blue Shield Building, 133 Federal Street, Boston



Figure # 7. 133 Federal Street from the corner of Federal Court and Milton Place (view NE).