

The Commonwealth of Massachusetts

March 8, 2016

William Francis Galvin, Secretary of the Commonwealth Massachusetts Historical Commission

Norman J. Orrall Chief, Division of Planning & Engineering DCR 251 Causeway St. Suite 600 Boston, MA 02114

RE: Charles River Speedway Complex, 1420-1440 Soldiers Field Road, Boston MHC#RC.31960

Dear Mr. Orrall:

Thank you for submitting project materials for the proposed reuse of the Charles River Basin Upper Reservation Headquarters (Speedway Complex) property through DCR's Historic Curatorship Program, which were received at this office February 24, 2016, in response to Massachusetts Historical Commission's (MHC) comments dated January 26, 2016.

Review of the information you submitted indicates that the proposed reuse project will demolish two historic Speedway buildings, Maintenance Garage B and Front Gabled Garage C, which are both listed in the National and State Registers of Historic Places, will rehabilitate the remaining historic Speedway buildings, and will construct a new 75-foot tall (with rooftop mechanicals extending to 89 feet) residential building at the northern portion of the historic property abutting Soldiers Field Road, which is also listed in the National and State Register of Historic Places.

I have reviewed the information you submitted and have determined that the proposed reuse of the Speedway Complex through the curatorship program will have an "adverse effect" (950 CMR 71.05(a)) on the Speedway Complex through the complete demolition of Maintenance Garage B and Front Gabled Garage C, both of which are listed in the National and State Registers of Historic Places and (950 CMR 71.05(c)) through the introduction of visual elements (the new residential building) that are out of character with and alter the setting of the Speedway Complex.

The MHC hereby initiates MHC's consultation process pursuant to 950 CMR 71.07(3) to explore project alternatives that would eliminate, minimize or mitigate the "adverse effect" of the proposed project on the historic Speedway Complex.

Please submit an alternatives analysis of prudent and feasible alternatives that would avoid, minimize, or mitigate the adverse effect to the MHC for review and comment.

The demolition of a State Register-listed property triggers the filing of an Environmental Notification Form (ENF). If demolition of a State Register-listed property is the only anticipated ENF threshold, the proponent may consult with the MHC and change the project to result in a "no adverse effect" determination, or, as a result of consultation, seek to enter into a Memorandum of Agreement with the MHC in lieu of filing an ENF. If an ENF is not filed, the project review process must involve and take into account public comment prior to the development of any Memorandum of Agreement (301 CMR 11.03(10)).

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Please note that these comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00), and MEPA (301 CMR 11.03(10)), and do not serve as comments or approval regarding any applications for State or Federal Historic Rehabilitation Tax Credits.

MHC's comments regarding historic rehabilitation tax credit applications are submitted separately under those program regulations. To be eligible for historic rehabilitation tax credits the project must meet the Secretary of Interior's Standards.

Sincerely,

Brona Simon

State Historic Preservation Officer

Executive Director

Massachusetts Historical Commission

xc: Patrice Kish, DCR

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