June 9, 2021

Secretary Kathleen Theoharides  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street  
Boston, MA 02114  

ATTN: Erin Flaherty, MEPA Office

RE: Massachusetts General Hospital (MGH) – 2019 IMP Projects, Boston (Downtown), MA; MHC# RC. 66152; EEA# 16012

Dear Secretary Theoharides:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Draft Environmental Impact Report (DEIR) submitted for the project referenced above and have the following comments.

Since the filing of the ENF, the MHC understands that the project has changed. The proposed project consists of the construction of the “Clinical Services Building” on the site bound by Parkman Street, Blossom Street, North Grove Street, and Cambridge Street. The “Clinical Services Building” consists of a five story podium that will span the project site. Above a five story podium, two towers are proposed. The western tower is proposed to be 7 floors over the podium and the eastern tower is proposed to be 8 floors over the podium. The DEIR states that the total height of the project will be 262 feet, not including mechanical penthouses and rooftop structures with heights of up to approximately 40 feet. The proposed project no longer includes the construction of the Campus Services Building.

The proposed project continues to propose the demolition of the three historic West End buildings: Sleeper Hall (24 Blossom Street/BOS.4159), historically known as the Winchell Elementary School, the West End Settlement House (16-18 Blossom Street/BOS.4158), and the West End Tenement House (25 North Anderson Street/BOS.4156). It is the opinion of MHC staff that the West End Settlement House, West End Tenement House, along with Sleeper Hall meet the criteria of eligibility for listing in the National Register of Historic Places as a contributing resources to a small historic district. These buildings are three of the few remaining buildings to have survived the destruction of the urban renewal program that leveled the vast majority of the West End neighborhood in the 1950s.

On May 14, 2019, the MHC determined that the proposed project will have an “adverse effect” (950 CMR 71.05(e) and 950 CMR 71.07(2)(b)(3)) on Sleeper Hall, the West End Settlement House, and the West End Tenement House through demolition of these historic buildings.

The MHC initiated its consultation process pursuant to 950 CMR 71.07(3) on May 14, 2019. The MHC requested that MGH explore alternatives that would eliminate or minimize the proposed demolitions,
including but not limited to moving the historic brick buildings to face Cambridge Street and constructing the new building behind the historic buildings.

MHC staff have reviewed the alternatives described within the DEIR. None of these alternatives eliminate or minimize the proposed demolitions. The MHC would like to note that retaining a façade of a building, but substantially demolishing the remainder of the historic building, does not minimize the adverse effect of demolition. Additionally, rebuilding facades of historic buildings does not eliminate or minimize the adverse effects of demolition as the reconstruction does not meet the Secretary of the Interior’s Standards as it would create a false sense of historical development.

The MHC requests that MGH continue to explore alternatives to demolition, specifically the relocation of any or all three of the historic buildings to other sites within the old West End neighborhood. These three historic West End buildings are visible reminders of the vibrant community that was the West End neighborhood. Their proposed demolition should be carefully and thoughtfully reconsidered. MGH had been careful caretakers of these buildings over the past decades. Other nearby sites owned by MGH or by others should be evaluated for moving one, two or all three of the buildings onto one or more sites. The preservation of the West End buildings would continue to be concrete, physical evidence of the late 19th-20th century history of this part of Boston. The former Winchell Elementary School is one of a few buildings to survive the destruction of the urban renewal program that leveled almost all of the West End neighborhood in the 1950s. It stands today as the only remaining school building that served the children of the West End. It also stands as a fine example of Romanesque Revival architecture by one of Boston’s leading designers, Arthur H. Vinal. The 1929 Colonial Revival style West End Settlement House was an important building within the West End neighborhood serving Jewish youth through the 1950s. The 1910 Classical Revival West End Tenement House is an important example of a West End tenement house. It is important to consider their unique historical importance and the need to explore ways that they can be preserved.

These comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C (950 CMR 71.00) and MEPA (301 CMR 11). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,

Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Steve Chilton, MDFA
Katherine Ronan, MWRA
Sally Mason Boemer, MGH
Boston Landmarks Commission
Boston Preservation Alliance
West End Museum