

The Flour and Grain Exchange

Boston Landmarks Commission Study Report



THE FLOUR AND GRAIN EXCHANGE



Boston Landmarks Commission
Environment Department
City of Boston

Report on the Potential Designation of the

FLOUR AND GRAIN EXCHANGE

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

Approved by: Ellen J. Long 10/5/93
Executive Director Date

Approved by: Alan Schwarz 10/5/93
Chairman Date

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1.0 LOCATION OF PROPERTY

1.1 Address

The address of the property is 177 Milk Street. The assessor's parcel number is 3940 in Ward 3.

1.2 Area in Which Property is Located

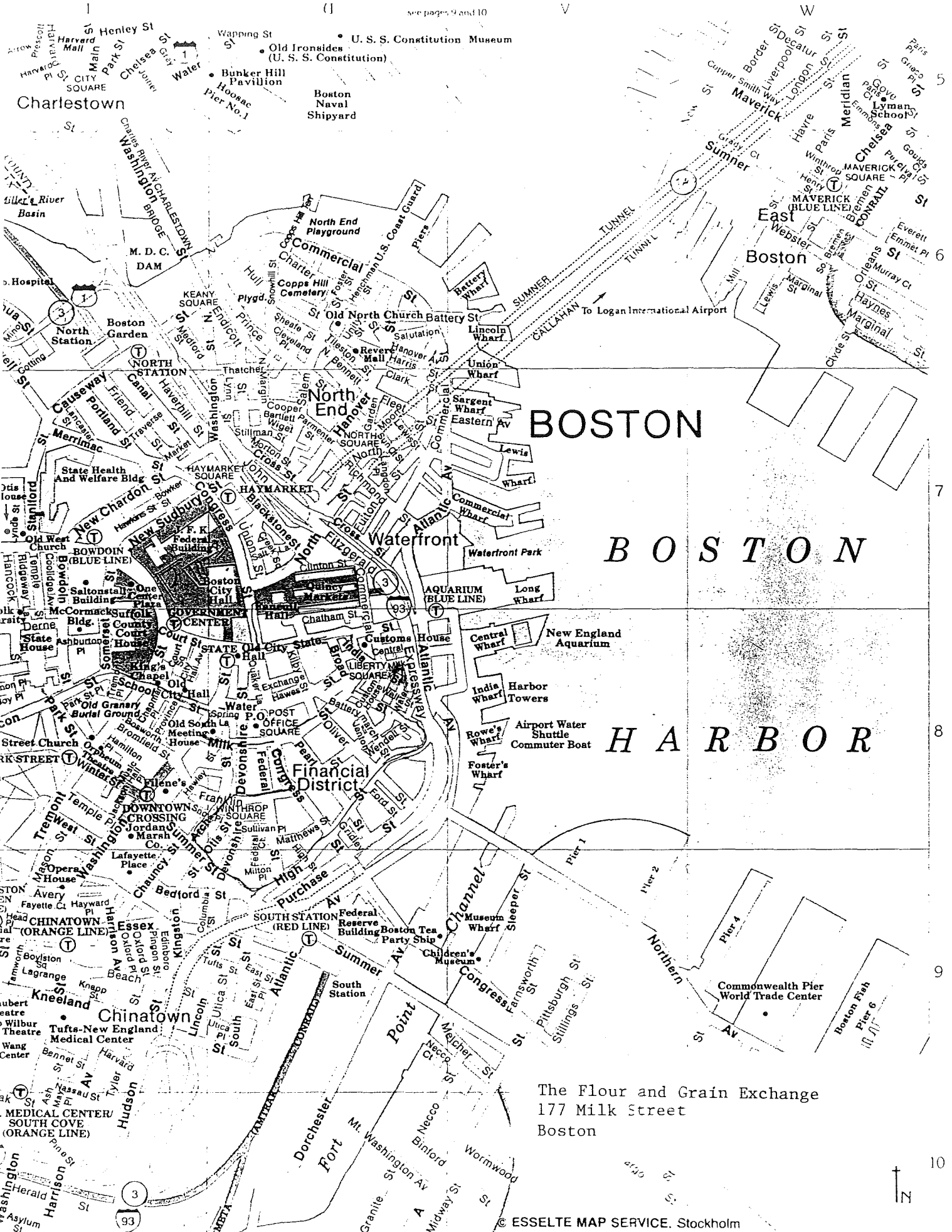
The Flour and Grain Exchange is located on a triangular lot at the intersection of Milk Street and India Street, in the Central Business District. The building faces Central Wharf to the northeast.

The property is a contributing structure to the Custom House National Register District, an area characterized by 19th century commercial architecture. Noteworthy structures in the district include: the Broad Street Associates buildings, built in the Federal Style in c.1805; Central Wharf at 146-176 Milk Street, built in 1819; the State Street Block, designed by Gridley J.F. Bryant and completed in 1858, and the Custom House, a designated Boston Landmark.

1.3 Map Showing Location:

Attached

see pages 9 and 10

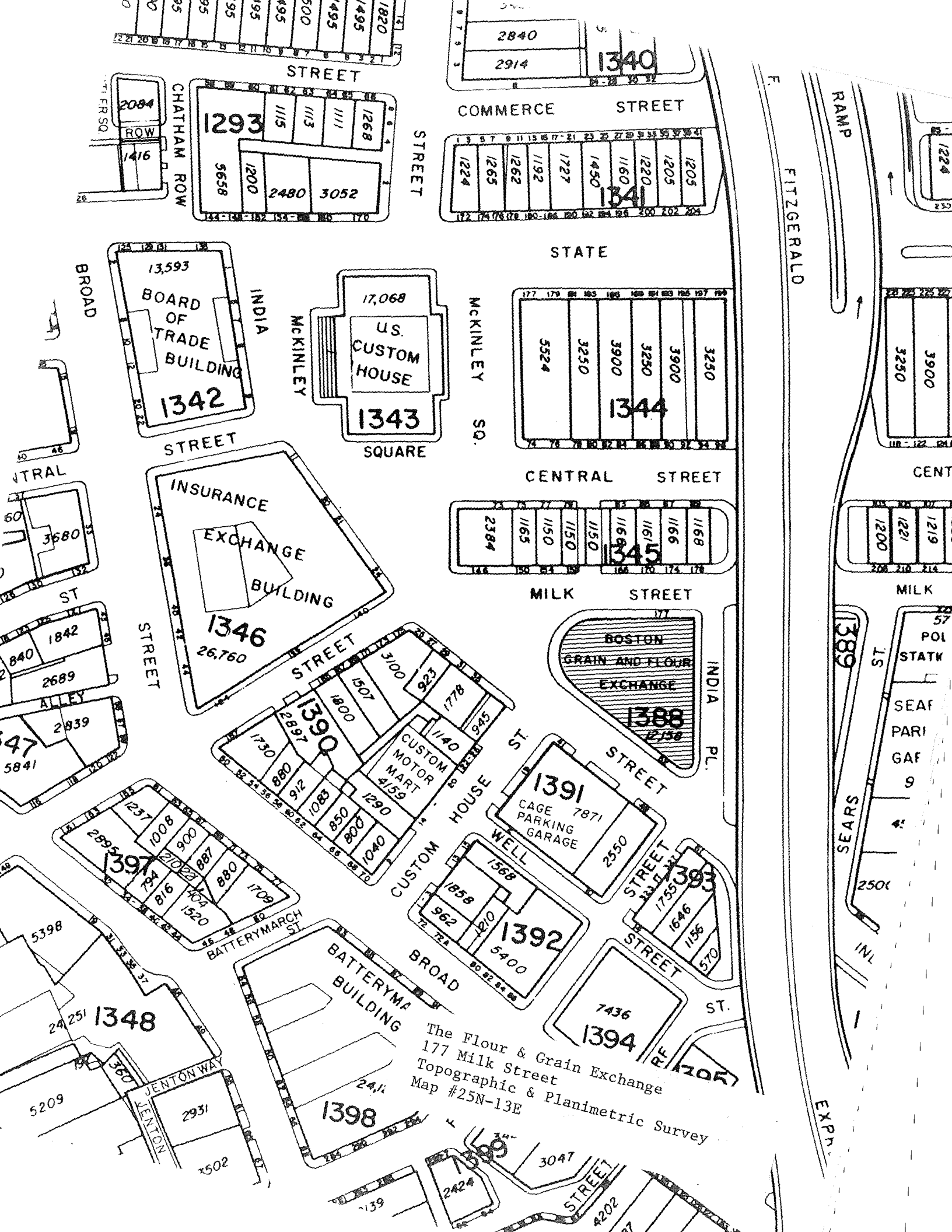


BOSTON

B O S T O N

H A R B O R

The Flour and Grain Exchange
 177 Milk Street
 Boston



The Flour & Grain Exchange
 177 Milk Street
 Topographic & Planimetric Survey
 Map #25N-13E

1820
1495
495
500
95
95
95
17
18
19
20
21

2840
2914
1340

2084
ROW
1416
1293
1115
1113
1111
1268
1200
2480
3052
5658
CHATHAM ROW
STREET

COMMERCE STREET
1205
1205
1220
1160
1450
1727
1192
1262
1265
1224
1341

13,593
BOARD OF TRADE BUILDING
1342
INDIA STREET
MCKINLEY SQUARE
17,068
U.S. CUSTOM HOUSE
1343

STATE STREET
3250
3900
3250
3900
3250
3524
1344

INSURANCE EXCHANGE BUILDING
1346
26,760
STREET

CENTRAL STREET
1168
1166
1164
1162
1150
1150
1150
1165
1165
2384
1345

1390
1730
880
912
1083
850
800
1040
1290
1140
1778
923
3100
1507
1800
2897
CUSTOM MOTOR MART
4159
CUSTOM HOUSE ST

MILK STREET
BOSTON GRAIN AND FLOUR EXCHANGE
1388
12,158
INDIA PL.

1398
BATTERY MARCH BUILDING
24,111
BATTERY MARCH ST
JENTON WAY
2931
3502

1391
CAGE PARKING GARAGE
7871
2550
1392
1568
1858
962
1210
5400
1393
1755
1646
1156
570
7436
1394
1706

FITZGERALD
RAMP
1224
3250
3900
CENTRAL STREET
1219
1221
1200
MILK STREET
POL
STATK
SEAF
PARI
GAF
9
SEARS
2500
INL
EXPN.

2.0 DESCRIPTION

2.1 Type and Use

The Flour and Grain Exchange is a granite commercial office building. It is occupied by several architectural firms and other professional businesses.

2.2 Physical Description

The Flour and Grain exchange is a three-sided, free-standing building. A small triangular park, with street trees and benches, is located directly in front of the entrance. The immediate area is characterized by the four story brick buildings of Central Wharf and late 19th century buildings ranging in height from five to twelve stories.

Filling the small block bounded by Milk Street on the north, India Street on the south, and India Place on the east, the building is three sided, with a rounded corner at the intersection of Milk and India Streets. The building measures 144 feet along India Street, 112 feet along Milk Street, and 136 feet along India Place. The parcel on which it stands is triangular as well, and covers an area of 12,166 feet.

The building is seven stories high with two additional stories enclosed in a cylindrical turret at the corner of Milk and India Streets. The building structure is steel and masonry, while the walls and foundation are constructed of rock-faced, Worcester quarry granite from Milford, Massachusetts.

The first through fifth floor facades are organized vertically into six bays at the corner, six bays facing Milk Street, and four bays facing India Street. In the sixth story, each of these bays is subdivided into three narrow, roundheaded bays. Horizontally, the main block of the building is organized into four levels by progressively deeper string courses. The first, second and sixth floors are treated individually, while the third, fourth and fifth floors are grouped into a single horizontal unit. The six roundheaded corner bays are each comprised of paired narrow roundheaded windows which are divided by engaged colonettes and topped by oculi. This section once defined the original three-story trading hall, since divided into two floor levels.

Building entrances are defined by clustered colonettes and low arched openings, with a short flight of steps onto the sidewalk. The corner entrance is further accentuated by a pavilion of shallow projection with

triangular pediment whose peak is filled by foliate carving. Ground and second floor window openings are broad and rectangular between masonry piers which are uniformly coursed with the exception of the heavier and wider stone of the lintel courses. Above the second floor, masonry courses are alternately wider and narrower, giving the upper portion of the facade both a finer grain and a horizontal emphasis in counterpoint to the verticality of the large and small arches of the window openings.

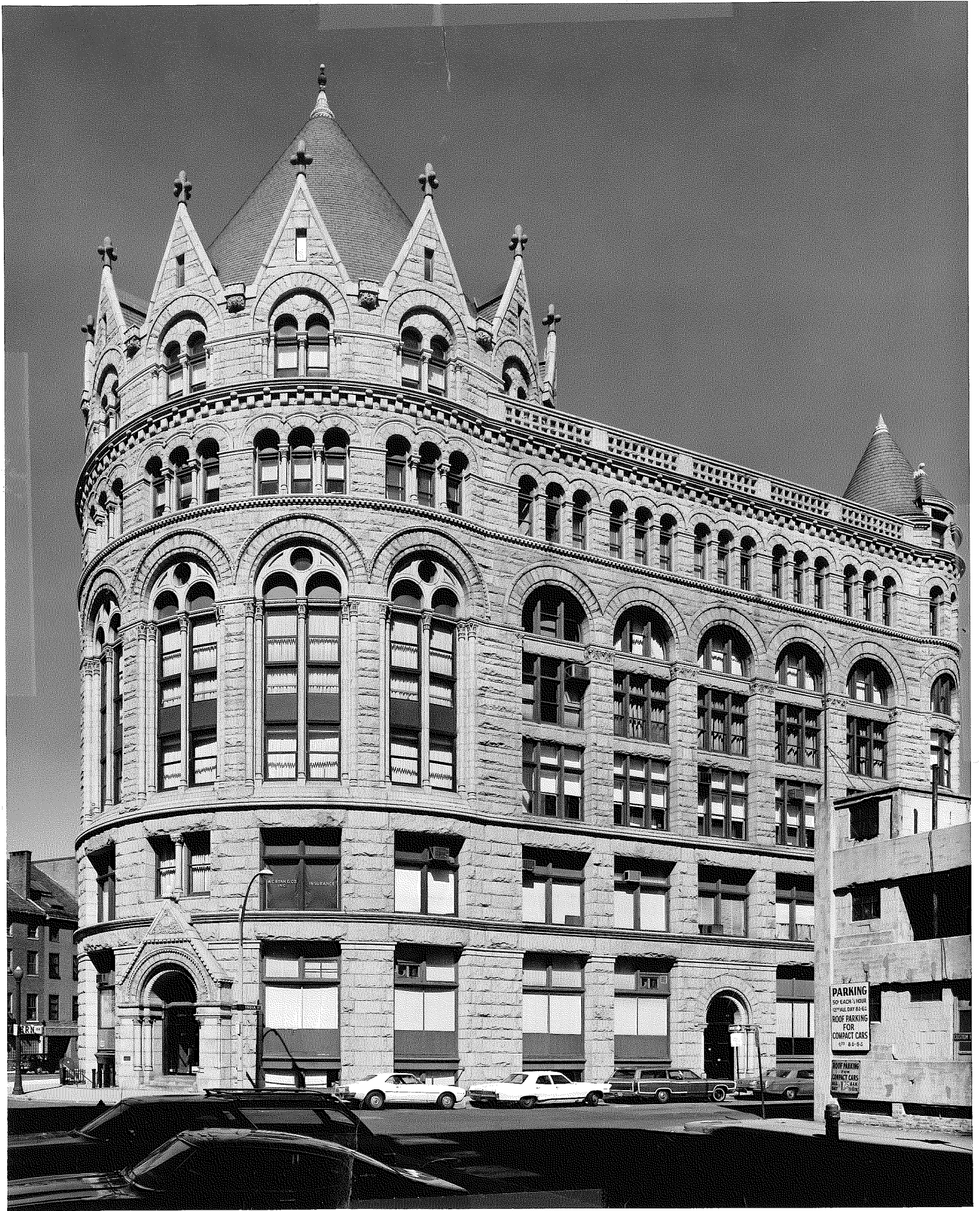
The entire composition is surmounted by a row of crocket-finial, triangular attic dormers which encircle the cornice like the teeth of an upturned saw blade. The turret is topped by a conical slate roof. The remaining portion of the roof is flat.

2.3 Photographs

Attached.



The Flour and Grain Exchange (1973)
From the corner of India and Milk Streets, looking southeast



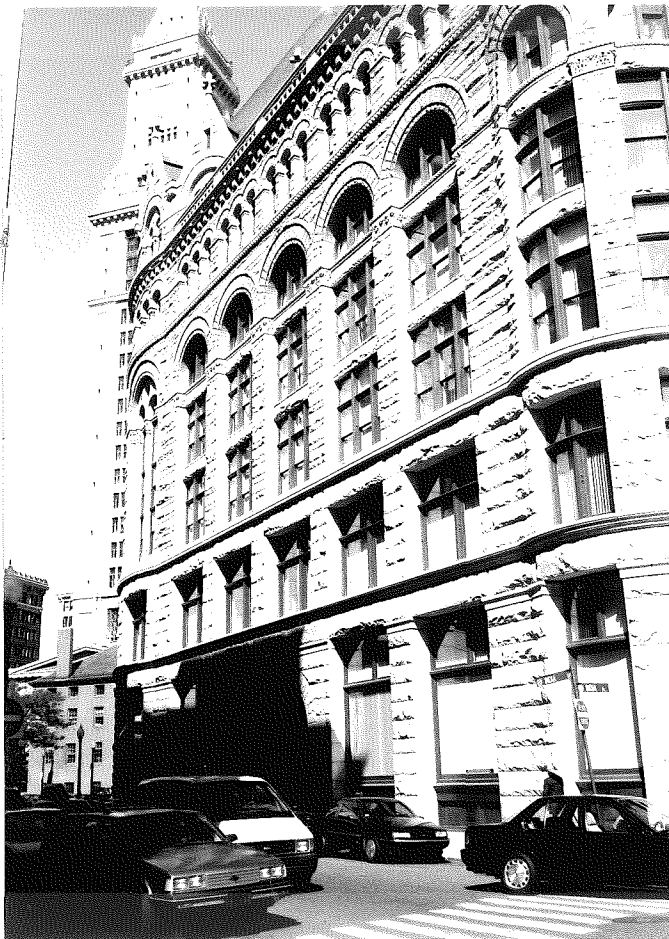
The Flour and Grain Exchange
From India Street looking northeast (date unknown)

(Right)
The Flour and Grain Exchange
October, 1993
From corner India and Milk Streets,
looking east.



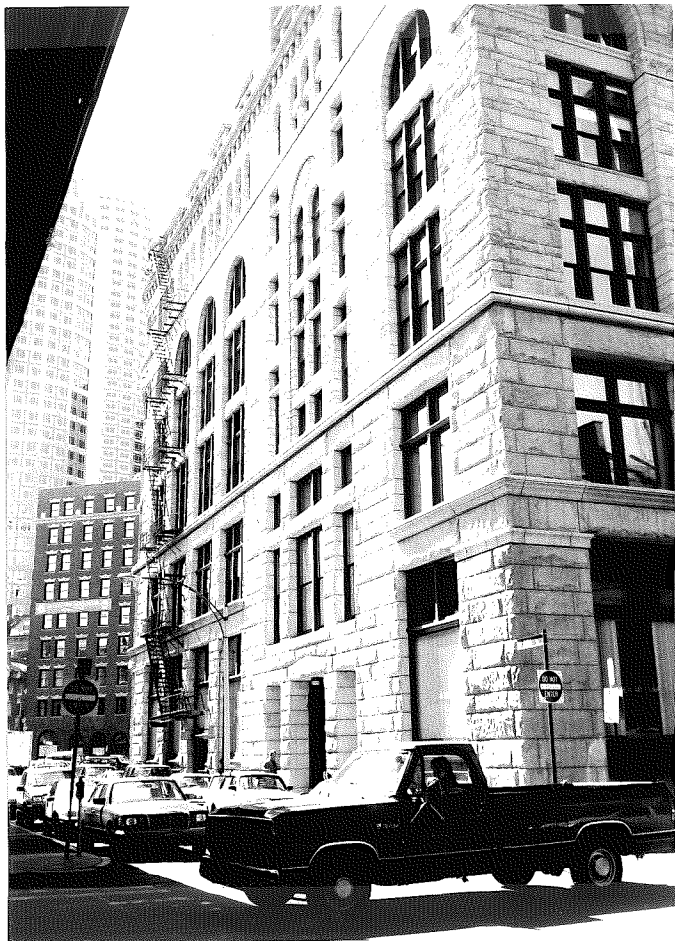
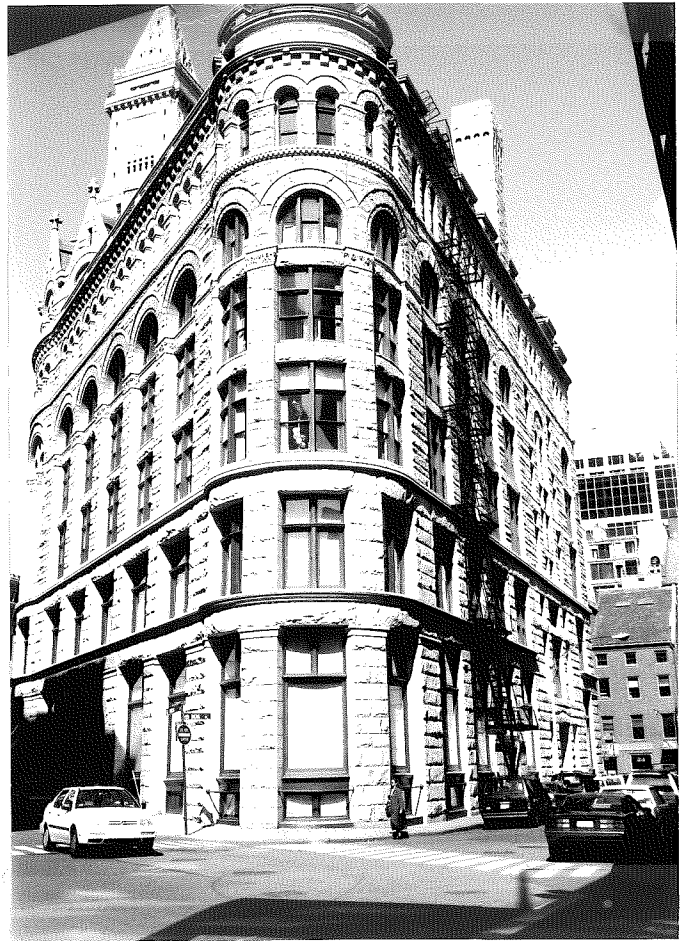
(Left)
The Flour and Grain Exchange
October, 1993
From corner India and Milk Streets,
looking east.

(Right)
The Flour and Grain Exchange
October, 1993
Milk Streets elevation.



(Left)
The Flour and Grain Exchange
October, 1993
India Streets elevation.

(Right)
The Flour and Grain Exchange
October, 1993
Corner of India Street and India Place.



(Left)
The Flour and Grain Exchange
October, 1993
India Place elevation
corner of India Place and Milk Street.

3.0 SIGNIFICANCE

3.1 Historic Significance

The Flour and Grain Exchange was originally built for the Boston Chamber of Commerce in 1892, at a cost of \$400,000. This organization was the third such body to exist in the city. The first Chamber of Commerce originated in 1793 and continued until 1804. The second body succeeded the original in 1836, but was dissolved by 1843. The third Chamber of Commerce was incorporated in 1885, a consolidation of two corporate trade bodies, the Boston Commercial Exchange and the Boston Produce Exchange. This new organization took possession of the quarters of the produce exchange under the dome of Quincy Market. Originally organized as a "grain exchange" the early chamber members were representatives of the grain and produce trades, as well as transportation and manufacturing interests.

The objectives of the association were to promote just and equitable principles of trade, to establish and maintain uniformity in commercial usage; to correct abuses which may exist; to acquire, preserve, and disseminate valuable business information; and, to adjust controversies and misunderstandings between its members. There was, however, a feeling among the members that the organization could not attain its full stature until it had a building of its own, one that would be both an ornament to the city and a credit to itself.

The site was donated in 1889 by the Central Wharf and Wet Dock Corporation and Henry M. Whitney, a member of the Chamber and the founder of Boston's electrified local transit system. The site was donated with the condition that a suitable building be erected on it, one which would fulfill the purpose of providing suitable room for commercial exchange in the city. A special building committee was appointed and construction began in May, 1890. In January, 1892 the building was formally dedicated at a grand ceremony where the audience included chamber of commerce members from across the country.

At the time of the dedication, the first floor was occupied by banks and steamship companies. The second floor and upper floors contained large offices. The third floor housed the Chamber of Commerce and included a board room, secretary's room, committee rooms, a reading room, director's rooms, parlors, lavatories and a telegraph office. Support services in the basement included a large restaurant, kitchens, a barber shop and the boiler and engine rooms.

The early Chamber of Commerce was influential, devoted and active in furtherance of the commerce and promotion of Boston. The Flour and Grain Exchange Building itself is historically significant as an expression of the financial growth of Boston and a desire to advance the interests of trade and commerce in the city.

3.2 Architectural Significance

The Flour and Grain Exchange is architecturally significant as a major work of the nationally prominent Boston architectural firm, Shepley, Rutan and Coolidge. The firm is the successor to Henry Hobson Richardson, a nationally renowned 19th century architect and designer of Trinity Church. The principals of the firm, George Foster Shepley, Charles Hercules Rutan and Charles Allerton Coolidge worked for H.H. Richardson until his death in 1886.

George Foster Shepley (1860-1903), was born in St. Louis. He graduated from MIT in 1882, and joined Richardson's office as a draftsman. Charles Hercules Rutan (1851-1914) was born in Newark, New Jersey and began his architectural training with the firm of Gambrell & Richardson in 1869. He was promoted to draftsman and eventually became one of Richardson's chief designers. Charles Coolidge (1858-1936), a native Bostonian, attended Harvard College and M.I.T. Coolidge received his early training in the Richardson's office. Each had increasing responsibilities in the latter years of the firm when Richardson's health failed. After Richardson's death, the three architects formed a partnership to complete the 25 projects left in Richardson's office. Unfinished projects turned over to the firm include the Allegheny County Courthouse in Pittsburgh and the Marshall Field Warehouse in Chicago, two designs which are noted as among Richardson's best.

The Romanesque massing and detail of the Flour and Grain Exchange owe much to Richardson's own Frederick L. Ames warehouse constructed in 1882 (now demolished) and the Cincinnati (Ohio) Chamber of Commerce Building. The Ames Warehouse stood at the corner of Bedford and Kingston Streets and, like the Flour and Grain Exchange, featured a curved facade organized into a succession of superimposed arched window openings, surmounted by a row of triangular dormers.

The architects and builders of the Flour and Grain Exchange employed innovative techniques for the construction of the building. According to the book issued at the dedication, "the floors and ceiling of the offices in the sixth and seventh stories over the Board Room are suspended from the roof."

The list of the firm's commissions is long and distinguished; their most significant works include: the original buildings of Stanford University (1890); the University of Chicago; the Chicago Art Institute and Public Library (1893-97); and the New York Hospital. Their work in the Boston area include the Ames Building (1892), the tallest building in the city at

the time of its completion, the First Parish Church in Brookline (1892), South Station Terminal (1899) and, numerous buildings at Harvard University and the Harvard Medical School (1903-07). Other Boston works include 17-23 Beach Street (1906) and the Boston Safe Deposit and Trust Company Building at 86-102 Franklin Street (1908-11)

Shepley, Rutan and Coolidge designed numerous lesser known buildings in Boston's neighborhoods such as the Rotch Memorial Hospital at 55 Shattuck Street and the Harvard Dental School at 188 Longwood Avenue, both completed in 1910, in the Longwood Medical Area. The firm also designed the Robert Breck Brigham/New England Baptist Hospital at 125 Parker Hill Avenue (1912-14) and the Jefferson School at 240 Heath Street (1903-04) on Mission Hill, and the Boston YMCA at 312-320 Huntington Avenue (1911-12) in the Fenway. Coolidge completed the Peter Brent Brigham Hospital, units at Massachusetts General Hospital and Children's Hospital.

Shepley, Rutan and Coolidge (1896-1915) was known subsequently as Coolidge and Shattuck (1915-1924) and then Coolidge, Shepley, Bulfinch and Abbot (1924-52). The firm is currently known as Shepley Bulfinch Richardson and Abbott. The 100 year lineage makes the firm the second oldest continuing architectural practice in the country.

The Grain Exchange also represents the work of a notable construction firm, the Norcross Brothers. This firm is associated with many of Boston's most significant late-19th century buildings, and with almost all of H.H. Richardson's best known designs. Well known in the industry for their innovative construction techniques, the firm was among the earliest builders to become general contractors, and was without question among the most important construction companies in America in the late nineteenth and early 20th centuries. The Norcross Brothers provided building materials from their own granite, slate and marble quarries, kilns, mills and ironworks. They provided services as engineers, consultants, estimators, suppliers of materials and skilled craftsmen. The Norcross Brothers built more than fifty percent of Richardson's designs and most of the major commissions. The builders had offices in Providence, New York, Pittsburgh, Chicago and St. Louis, and their clients included McKim Mead and White, Van Brunt and Howe, and Peabody and Stearns. Their most significant work includes the New York Public Library, the Rhode Island State House, The Corcoran Gallery and Scottish Rite Temple in Washington, and the remodeling of the White House.

3.3 Relationship to Criteria for Landmark Designation

The Flour and Grain Exchange meets the criteria for Landmark designation found in section 4 of Chapter 772 of the Acts of 1975, as amended. The Flour and Grain Exchange is:

- ◆ A contributing building to the Custom House National Register District;
- ◆ A structure identified with and representing an important aspect of the economic history of the city, the commonwealth and the New England region;
- ◆ A structure representative of elements of architectural design which embody distinctive characteristics of a type inherently valuable for study of a style of construction or development, and a notable work of an architect and builder whose work influenced the development of the city and the nation.

4.0 ECONOMIC STATUS

4.1 Current Assessed Value

According to City of Boston assessor's records, the Flour and Grain Exchange has an assessed value of \$5,533,500.00 The land is assessed at \$2,354,000 and the building is assessed at \$3,179,500. Taxes paid on the property in fiscal year 1993 were \$221,284.67.

4.2 Current Ownership

The Flour and Grain Exchange is owned by Bruce A. Beal.

5.0 PLANNING CONTEXT

5.1 Background

The Custom House District was at one time the heart of Boston's waterfront activity, centered along the shores of the Great Cove, the innermost section of Boston Harbor. In the early 18th century, the harbor was cluttered by small wharves, and in 1710, Long Wharf was constructed to accommodate larger vessels. By the end of the century, Boston was the undisputed leader in the China trade. These circumstances made further development of the Boston waterfront an attractive business venture. Central Wharf and the Broad Street Associates buildings, designed and planned by Charles Bulfinch, are remnants of the major development which occurred in the area between 1800-1820.

The commercial vigor of the area was intensified by the development of Quincy Market in the 1820s and the Custom House in the 1830s. This commercial prosperity sparked a building boom in the 1840s, during which large granite loft warehouses were constructed and from which a wide variety of goods were sold. The golden age of the Port of Boston lasted until about 1850. As the country began to expand westward, it became important to have railroad lines connected with the ports to move goods to the new frontier. Boston was usurped as the leading port by New York when it established a means of moving goods west by the Erie Canal. Boston lagged behind in its construction of railroads, and for a number of years, Boston's railroads reached only as far as Albany. Still, at the turn of the century, Boston was the second ranking port in the nation.

After the Great Fire of 1872, rebuilding transformed the area into an extension of the Financial District. Growing demand for office space led to the construction of ten-to-fifteen story structures, many of which remain today and contribute to the architectural diversity of the area.

5.2 Current Planning Issues

The Flour and Grain Exchange was surveyed by the Boston Landmarks Commission in 1980 as part of the Central Business District Preservation Study. The Flour and Grain building was evaluated as a building of "Major Significance" and recommended for listing as an individual landmark.

Numerous building rehabilitation projects and some new construction occurred in the 1980s in the area surrounding the Flour and Grain

Exchange. One major project, adjacent to the subject property, is the Jaymont development at 20 and 21 Custom House Street. Other new construction includes the developments at 75 State Street, the Market Place Center Project, and the Limited Building at Faneuil Hall.

The Flour and Grain Exchange is adjacent to the elevated Central Artery. Construction of a new, depressed Central Artery has begun and is expected to continue for approximately ten years. The project conservator for the Central Artery project has determined that the construction could have a medium impact on the property. This is mainly due to the proximity of the building to the project and the fact that the building is constructed on filled land.

The Flour and Grain Building is located in the Government Center/Markets Zoning District. This zoning, Article 45, was approved by the mayor on April 1, 1991.

The Government Center/Markets District Plan states as its development strategy:

The process of managing growth focuses primarily on measures to humanize less successful components of the original Government Center Urban renewal plan by improving underutilized or ill-defined areas with forms related more to the pedestrian rather than the auto.

The district plan goes on to state:

The Government Center District contains monuments of great importance to the history of the city, the Commonwealth and nation, as well as more modest structures which lend scale, interest, and dignity to the area. With areas developed during the 18th and 19th centuries, as well as the Urban Renewal era, Government Center provides a common setting for history and tradition on the one hand and progress and change on the other.

These concerns stated in the District plan area mirrored in the Statement of Goals of the Zoning Article which state a desire to "preserve Boston's historic resources and public spaces which are a vital component of Boston's heritage. The Zoning Article creates "Protection Areas" in an attempt to protect existing scale, quality of pedestrian environment, and concentrations of historic buildings within and abutting the protection areas. The design review procedures for protection areas within this zoning district call for the Boston Landmarks Commission to review

certain work, in an advisory capacity to the Boston Redevelopment Authority.

5.3 Current Zoning

The Flour and Grain Exchange is located in an area currently zoned for office and commercial use. It is within a 65' protection area, with an allowed Floor Area Ratio of 4.

6.0 ALTERNATIVE APPROACHES

6.1 Alternatives

Both the significance of the structure and the language of the Commission's enabling statute, which precludes all but Landmark designation in the central city, indicate designation as a Landmark.

The Commission also retains the option of not designating the building as a Landmark.

6.2 Impact of Alternatives

Landmark designation under Chapter 772 would require the review of physical changes to the building exterior in accordance with the standards and criteria adopted as part of the designation. It would not, however, affect the use or treatment of the building interior.

The building is located within the Custom House National Register District. This listing provided protection from federal, federally-licensed or federally assisted actions. National Register listing also provides federal income tax incentives for rehabilitation. Properties within a National Register district are eligible to take advantage of these provisions once it is determined that the rehabilitation can be certified according to the Tax Act and that the building contributes to the historic character of the district.

Similar protection from state-sponsored activities is achieved by the concurrent listings of all National Register properties in the State Register of Historic Places under Chapter 152 of the General Law of Massachusetts.

Failure to designate the building as a Landmark would mean the City could offer no protection to the structure or guidance to present or future owners.

7.0 RECOMMENDATIONS

The staff of the Boston Landmarks Commission recommends that the exterior of the Flour and Grain Exchange at 177 Milk Street be designated as a Landmark under Chapter 772 of the Acts of 1975 as amended. The boundaries of the designation should correspond to the boundaries of parcel 3940.

The standards for administering the regulatory functions provided for in Chapter 772 are attached.

8.0 GENERAL STANDARDS AND CRITERIA

8.1 Introductory Statement on Standards and Criteria to be used in evaluating Applications for Certificates

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 Landmark designation which shall be applied by the Commission in evaluating proposed changes to the property. 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 Standards and Criteria established thus note those features which must be conserved and/or enhanced to maintain the viability of the Landmark designation.

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 insure 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.

As intended by the statute a wide variety of buildings and features are included within the area open to Landmark designation, and an equally wide range exists in the latitude allowed for change. Some properties of truly exceptional architectural and/or historical value will permit only the most minor modifications, while for some others the Commission encourages changes and additions with a contemporary approach, consistent with the properties' existing features and changed uses.

In general, the intent of the Standards and Criteria is to preserve existing qualities that cause designation of a property; however, in some cases they have been structured as to encourage the removal of additions that have lessened the integrity of the property.

It is recognized that changes will be required in designated properties for a wide variety of reasons, not all of which are under the complete control of the Commission or the owners. Primary examples are:

- ◆ Building code conformance and safety requirements;
- ◆ Changes necessitated by the introduction of modern mechanical and electrical systems;
- ◆ Changes due to proposed new uses of a property.

The response to these requirements may, in some cases, present conflicts with the Standards and Criteria for a particular property. The Commission's evaluation of an application will be based upon the degree to which such changes are in harmony with the character of the property.

In some cases, priorities have been assigned within the Standards and Criteria as an aid to property owners in identifying the most critical design features.

The Standards and Criteria have been divided into two levels:

- ◆ Those general ones that are common to almost all landmark designations (subdivided into categories for buildings and landscape features); and,
- ◆ Those specific ones that apply to each particular property that is designated. In every case the Specific Standards and Criteria for a particular property shall take precedence over the General ones if there is a conflict.

8.2 General Standards and Criteria

A. Approach

1. The design approach to the property should begin with the premise that the features of historical and architectural significance described within the Study Report must be preserved. In general, this will minimize the exterior alterations that will be allowed.
2. Changes and additions to the property and its environment which have taken place in the course of time are evidence of the history of the property and the neighborhood. These changes to the property may have developed significance in their own right, and this significance should be recognized and respected. ("later integral features" shall be the term used to convey this concept.)
3. Deteriorated material or architectural features, whenever possible, should be repaired rather than replaced or removed.
4. When replacement of architectural features is necessary is should be based on physical or documentary evidence of original or later integral features.
5. New materials should, whenever possible, match the material being replaced in physical properties and should be compatible with the size, scale, color, material and character of the property and its environment.
6. New additions or alterations should not disrupt the essential form and integrity of the property and should be compatible with the size, scale, color, material and character of the property and its environment.
7. Contemporary design is encouraged for new additions; thus, they must not necessarily be imitative of an earlier style of period.
8. New additions or alterations should be done in such a way that if they were to be removed in the future, the essential form and integrity of the historic property would be unimpaired.
9. Priority shall be given to those portions of the property which are visible from public ways or which it can be reasonability inferred may be in the future.

10. Color will be considered part of specific standards and criteria that apply to a particular property.

B. Exterior Walls

Masonry

1. Retain whenever possible, original masonry and mortar.
2. Duplicate original mortar in composition, color, texture, joint size, joint profile and method of application.
3. Repair and replace deteriorated masonry with material which matches as closely as possible.
4. When necessary to clean masonry, use gentlest method possible. Do not sandblast. Doing so changes the visual quality of the material and accelerates deterioration. Test patches should always be carried out well in advance of cleaning (including exposure to all seasons if possible).
5. Avoid applying waterproofing or water repellent coating to masonry unless required to solve a specific problem. Such coatings can accelerate deterioration.
6. In general, do not paint masonry surfaces. Painting masonry surfaces will be considered only when there is documentary evidence that this treatment was used at some point in the history of the property.

Non-Masonry

1. Retain and repair original or later integral material whenever possible.
2. Retain and repair, when necessary, deteriorated material with material that matches.

C. Roofs

1. Retain original roof covering whenever possible.

- a. Location shall be selected where the penthouse is not visible from the street or adjacent buildings; setbacks shall be utilized.
- b. Overall height or other dimensions shall be kept to a point where the penthouse is not seen from the street or adjacent buildings.
- c. Exterior treatment shall relate to the materials, color and texture of the building or to other materials integral to the period and character of the building, typically used for appendages.
- d. Openings in a penthouse shall relate to the building in proportion, type and size of opening, wherever visually apparent.

H. Landscape Features

1. The general intent is to preserve the existing or later integral landscape features that enhance the landmark property.
2. It is recognized that often the environment surrounding the property has character scale and street pattern quite different from that existing 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 feature between the landmark and its newer surroundings.
3. The exiting landforms of the site shall not be altered unless shown to be necessary for maintenance of the landmark or site. Additional landforms will only be considered if they will not obscure the exterior of the landmark.
4. Original layout and materials of the walks, steps, and paved areas should be maintained. 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 landmark.
5. Existing healthy plant materials should be maintained as long as possible. New plant materials should be added on a schedule that

will assure a continuity in the original landscape design and its later adaptations.

6. Maintenance of, removal of and additions to plant materials should consider maintaining existing vistas of the landmark.

I. Exterior Lighting

1. There are three aspects of lighting related to the exterior of the building
 - a. Lighting fixtures as appurtenances to the building or elements of architectural ornamentation.
 - b. Quality of illumination on building exterior
 - c. Interior lighting as seen from the exterior.
2. Wherever integral to the building, original lighting fixtures shall be retained. Supplementary illumination may be added where appropriate to the current use of the building.
3. New lighting shall conform to any of the following approaches as appropriate to the building and to the current or projected use:
 - a. Accurate representation of the original period, based on physical or documentary evidence.
 - b. Retention or restoration of fixtures which date from an interim installation and which are considered to be appropriate to the building and use.
 - c. New lighting fixtures which are contemporary in design and which illuminate the exterior of the building in a way which renders it visible at night and compatible with its environment.
4. If a fixture is to be replaced, the new exterior lighting shall be located where intended in the original design. If supplementary lighting is added, the new location shall fulfill the functional intent of the current use without obscuring the building form or architectural detailing.

5. Interior lighting shall only be reviewed when its character has a significant effect on the exterior of the building; that is, when the view of the illuminated fixtures themselves, or the quality and color of the light they produce, is clearly visible through the exterior fenestration.

J. Removal of Later Additions and Alterations

1. Each property will be separately studied to determine if later additions and alterations can, or should, be removed. It is not possible to provide one general outline.
2. Factors that will be considered 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; and,
 - d. Functional usefulness.

9.0 SPECIFIC STANDARDS AND CRITERIA

The Flour & Grain Exchange 177 Milk Street

9.1 Introduction

1. The intent of these standards and criteria is to preserve the overall character and appearance of the building, including its exterior form, its mass, and its richness of detail.
2. The standards and criteria acknowledge that there will be changes to the exterior of the building and are intended to make the changes sensitive to the architectural character of the building.
3. In these guidelines the verb "Should" indicates a recommended course of action; the verb "Shall" indicates those actions which are specifically required to preserve and protect significant architectural elements.
4. **The Milk Street, India Street and India Place Elevations; and the roof** are subject to the terms of the exterior guidelines herein stated.
5. Items under Commission review include but are not limited to the following.

9.2 Exterior Walls

A. General

1. No new openings shall be allowed.
2. No original existing openings shall be filled or changed in size.
3. No exposed conduit shall be allowed on any elevation.

B. Masonry (Brick, Stone, Terra Cotta, Concrete, Stucco and Mortar)

1. The Boston Landmarks Commission recommends that the masonry work outlined below be executed with the guidance of a professional building materials conservator.

2. All granite elements and detailing; such as string courses, engaged colonettes, pediments, decorative foliate carvings, crocket-finials, balustrade and rock-face finish shall be preserved.
3. Original or later contributing masonry materials, features, details, surfaces and ornamentation shall be retained and, if necessary, repaired by patching, piecing-in, or consolidating the masonry using recognized preservation methods.
4. Deteriorated or missing masonry materials, features, details, surfaces and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile and detail of installation.
5. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
6. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
7. Original mortar shall be retained.
8. Deteriorated mortar shall be carefully removed by hand-raking the joints.
9. Use of mechanical saws and hammers shall not be allowed.
10. Repointing mortar shall duplicate the original mortar in strength, composition, color, texture, joint size, joint profile and method of application.
11. Sample panels of raking the joints and repointing shall be reviewed and approved by the staff of the Boston Landmarks Commission.
12. Cleaning of masonry is discouraged and should be performed only when necessary to halt deterioration.
13. If the building is to be cleaned, **the mildest method possible** shall be used.
14. A test patch of the cleaning method(s) shall be reviewed and approved on site by staff of the Boston Landmarks Commission. Test patches should always be carried out well in advance of cleaning (including exposure to all seasons if possible).

15. **Sandblasting (wet or dry), wire brushing, or other similar abrasive cleaning methods shall not be permitted.** Doing so changes the visual quality of the material and accelerates deterioration.
16. Waterproofing or water repellents are strongly discouraged. These treatments are generally not effective in preserving masonry and can cause permanent damage. The Commission does recognize that in extraordinary circumstances their use may be required to solve a specific problem. Samples of any proposed treatment shall be reviewed by the Commission before application.
17. 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 point in the history of the property.

C. Wood

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

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

D. Architectural Metals (Cast Iron, Steel, Pressed Tin, Copper, Aluminum and Zinc)

1. All metal materials, features, details and ornamentation such as; metal finials shall be preserved.
2. Original or later contributing metal materials, features, details and ornamentation shall be retained and, if necessary, repaired by patching, splicing or reinforcing the metal using recognized preservation methods.
3. Deteriorated or missing metal materials, features, details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile and detail of installation.
4. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
6. Cleaning of metal elements either to remove corrosion or deteriorated paint shall use **the mildest method possible**.
7. Abrasive cleaning methods, such as low pressure dry grit blasting, may be allowed as long as it does not abrade or damage the surface.
8. A test patch of the cleaning method(s) shall be reviewed and approved on site by staff of the Boston Landmarks Commission. Test patches should always be carried out well in advance of cleaning (including exposure to all seasons if possible).

9. 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.
10. Repainting should be based on paint seriation studies. If an adequate record does not exist repainting shall be done with colors that are appropriate to the style and period of the building.

9.3 Windows

Refer to Sections 9.2, B, C, D regarding treatment of materials and features.

1. All window elements, details and features such as; single light single sash and transom on the second floor, single light double hung sash at the third and fourth floors, single light double hung sash and single light arched transom at the sixth and seventh floors, single light oculi, mullions and transom bar shall be preserved.
2. The original window design and arrangement of window openings shall be retained.
3. Enlarging or reducing window openings for the purpose of fitting stock (larger or smaller) window sash or air conditioners shall not be allowed.
4. Removal of window sash and the installation of permanent fixed panels to accommodate air conditioners shall not be allowed.
5. Original or later contributing window elements, features (functional and decorative), details and ornamentation shall be retained and, if necessary, repaired by patching, splicing, consolidating or otherwise reinforcing using recognized preservation methods.
6. Deteriorated or missing window elements, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
7. When replacement is necessary, it should be based on physical or documentary evidence. Reinstallation of wood sash is encouraged.

8. Vinyl, or vinyl clad replacement sash shall not be allowed.
9. Simulated muntins, including snap-in, surface-applied, or between-glass grids shall not be allowed.
10. Tinted or reflective-coated glass (i.e.: low "e") shall not be allowed.
11. Metal or vinyl panning of the wood frame and molding shall not be allowed.
12. Only clear single-paned glass shall be allowed in multi-light windows since insulating glass in multi-light windows will exaggerate the width of the muntins.
13. Exterior combination storm windows may be allowed provided the installation has a minimal visual impact. However, use of interior storm windows is encouraged.
14. Exterior combination storm windows shall have a narrow perimeter framing that does not obscure the glazing of the primary window. In addition, the meeting rail of the combination storm window must align with that of the primary window.
15. Storm window sashes and frames shall have a painted finish that matches the primary window sash and frame color.
16. Clear or mill finished aluminum frames shall not be allowed.
17. Exterior storm windows shall not be allowed for arched windows, leaded glass, faceted frames, or bent(curved) glass.
18. Window frames, and sashes should be of a color based on paint seriation studies. If an adequate record does not exists repainting shall be done with colors that are appropriate to the style and period of the building.

9.4 Storefronts

Refer to Sections 9.2, B, C, D regarding treatment of materials and features; and Sections 9.3, 9.5, 9.11, 9.12 for additional Standards and Criteria that may apply.

1. All storefront materials and features such as; display windows, transom bulkhead windows shall be preserved.

2. Original or later contributing storefront materials and features (functional and decorative) shall be retained and, if necessary, repaired by patching, splicing, consolidating or otherwise reinforcing using recognized preservation methods.
3. Deteriorated or missing storefront materials, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
6. Original or later integral storefront materials, features (functional and decorative), details and ornamentation shall not be sheathed or otherwise obscured by other materials.
7. Roll-down metal grates or grilles shall not be allowed on the exterior of a storefront. All security devices should be located in the interior.
8. Removal of transoms and installation of permanent fixed panels to accommodate air conditioners shall not be allowed.
9. Storefront 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/storefront.
10. The removal of the exhaust fans from the bulkhead windows on India Street is encouraged.

9.5 Entrances/Doors

Refer to Sections 9.2, B, C, D regarding treatment of materials and features; and Sections 9.4, 9.6, 9.11, 9.12 for additional Standards and Criteria that may apply.

1. All entrance elements, materials, details and features such as; three panel wood doors on the side elevations, granite steps shall be preserved.
2. The original entrance design and arrangement of door openings shall be retained.

3. Enlarging or reducing entrance/door openings for the purpose of fitting stock (larger or smaller) doors shall not be allowed.
4. Original or later contributing entrance materials, elements, details and features (functional and decorative) shall be retained and, if necessary, repaired by patching, splicing, consolidating or otherwise reinforcing using recognized preservation methods.
5. Deteriorated or missing entrance elements, materials, features (functional and decorative) and details shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
6. When replacement is necessary, it should be based on physical or documentary evidence.
7. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
8. Original or later contributing entrance materials, elements, features (functional and decorative) and details shall not be sheathed or otherwise obscured by other materials.
9. Only paneled doors of appropriate design, material and assembly shall be allowed.
10. Flush doors (metal, wood, vinyl or plastic), sliding doors and metal paneled doors shall not be allowed.
11. In general, 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.
12. Unfinished aluminum storm doors shall not be allowed.
13. Replacement door hardware should replicate the original or are appropriate to the style and period of the building.
14. Entry lighting shall be located in traditional locations (e.g., suspended from the vestibule ceiling, or attached to the side panels of the entrance.).
15. Light fixtures shall not be affixed to the face of the building.

16. Light fixtures shall be of a design and scale that is appropriate to the style and period of the building. Contemporary light fixtures will be considered, however, not imitate styles earlier than the building.
17. Buzzers, alarms and intercom panels shall be flush mounted inside the recess of the entrance and not on the face of the building.
18. Entrance elements, such as doors, fanlights sidelights, surrounds, etc., 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.

9.6 Porches and Stoops

Refer to Sections 9.2, B, C, D regarding treatment of materials and features; and Sections 9.5, 9.8, 9.12, 9.13 for additional Standards and Criteria that may apply.

Non Applicable

9.7 Ironwork (includes balconies, window grilles, fire escapes)

Refer to Section 9.2.D regarding treatment of materials and features.

1. New balconies shall not be permitted on primary elevations.
2. Fixed diagonal fire stairways shall not be allowed.
3. The installation of security grilles may be allowed.
4. Window grilles shall be mounted within the window reveal and secured into the mortar joints rather into the masonry or onto the face of the building.
5. Window grilles shall have pierced horizontal rails or butt-welded joints. Overlapping welded joints shall not be allowed.
6. Window grilles shall not project beyond the face of the building.
7. Ironwork elements, such as balconies, window grilles, fire escapes etc., 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. The removal of the fire escape at the India Place elevation is encouraged.

9.8 Roofs

Refer to Section 9.2 B, C, D regarding treatment of materials and features; and Sections 9.9 for additional Standards and Criteria that may apply.

1. The flat roof and the two cylindrical turrets and all roofing materials, elements and features such as; slates metal finials shall be preserved.
2. Original or later contributing roofing materials, elements, features (decorative and functional), details and ornamentation shall be retained and, if necessary, repaired by patching or reinforcing using recognized preservation methods.
3. Deteriorated or missing roofing materials, elements, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute materials 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..
8. No external gutters and downspouts shall be allowed.
9. Satellite dishes, antennas and other communication devices shall be located so that they are unobtrusive and not visible from public ways.
10. Additional roof projections (such as penthouses, roof decks, mechanical or electrical equipment) may be allowed provided that they are located out of view from public way and conform with **SECTION 9.9**.

11. New skylights may be allowed if they have a flat profile or have a traditional mullion shape. In addition, skylights shall be located so that they are not visible from a public way.
12. Skylights shall not be allowed in the cylindrical turrets.
13. Replacement of the schooner weathervane as depicted in early images of the building is encouraged.

9.9 Roof-top additions/Penthouses/Headhouses

Refer to Section 9.8 for additional Standards and Criteria that may apply.

1. The objective of preserving the integrity of the original or later contributing roof shape shall provide the basic criteria in judging whether an addition/penthouse/headhouse can be added to a roof. Height of a building, prominence of roof form, and visibility shall govern whether an addition/penthouse/headhouse will be approved.
2. Minimizing or eliminating the visual impact of the addition/penthouse/headhouse is the general objective and the following guidelines shall be followed:
 - a. Location shall be selected where the addition/penthouse/headhouse is not visible from the street or adjacent buildings; setbacks shall be utilized.
 - b. Overall height or other dimensions shall be kept to a point where the addition/penthouse/headhouse is not seen from the street or adjacent buildings.
 - c. Exterior treatment shall related to the materials, color and texture of the building or to other materials integral to the period and character of the building, typically used for appendages.
 - d. Openings in a addition/penthouse/headhouse shall relate to the building in proportion, type and size of opening, wherever visually apparent.
3. Because of the prominent roof shape no additions to the height of the building shall be allowed.

2. Preserve the integrity of the original or later integral roof shape.
3. Whenever possible, replace deteriorated roof covering with material which matches the old in composition, size, shape, color, texture and installation detail.
4. Preserve architectural features which give the roof its character, such as cornices, gutters, iron filigree, cupolas, dormers and brackets.

D. Windows and Doors

1. Retain original and later integral door and window openings where they exist. Do not enlarge or reduce door and window openings for the purpose of fitting stock window sash or doors, or air conditions.
2. Whenever possible, repair and retain original or later integral window elements such as sash, lintels, sills, architraves, glass shutters and other decorations and hardware. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.
3. On some properties, consideration will be given to changing from the original window details to other expressions such as to a minimal anonymous treatment by the use of a single light, when consideration of cost, energy conservation or appropriateness override the desire for historical accuracy. In such cases, consideration must be given to the resulting effect on the interior as well as the exterior of the building.

E. Porches, Steps and Exterior Architectural Features

1. Retain and repair porches and steps that are original or later integral features including such items as railings, balusters, columns, posts, brackets, roofs, ironwork, benches, fountains, statues and decorative items.

F. Signs, Marquees and Awnings

1. Signs, marquees and awnings integral to the building ornamentation or architectural detailing shall be retained and repaired where necessary.
2. New signs, marquees and awnings shall not detract from the essential form of the building nor obscure its architectural features.
3. New signs, marquees and awning shall be of a size and material compatible with the building and its current use.
4. Signs, marquees and awnings applied to the building shall be applied in such a way that they could be removed without damaging the building.
5. All signs added to the building shall be part of one system of design, or reflect a design concept appropriate to the communication intent.
6. Lettering forms or typeface will be evaluated for the specific use intended, but generally shall be either contemporary or relate to the period of the building or its later integral features.
7. Lighting of signs will be evaluated for the specific use intended, but generally illumination of a sign shall not dominate illumination of the building.
8. The foregoing notwithstanding, signs are viewed as the most appropriate vehicle for imaginative and creative expression, especially in structure being reused for purpose different from the original, and it is not the Commission's intent to stifle a creative approach to signage.

G. Penthouses

1. The objective of preserving integrity of the original or later integral roof shape shall provide the basic criteria in judging whether a penthouse can be added to a roof. Height of a building, prominence of roof form, and visibility shall govern whether a penthouse will be approved.
2. Minimizing or eliminating the visual impact of the penthouse is the general objective and the following guidelines shall be followed:

9.10 Additions

Refer to Sections 9.6, 9.7, 9.8 and 9.9 for additional Standards and Criteria that may apply.

1. No additions to the elevations shall be allowed.

9.11 Signs, Marquees and Awnings

Refer to Sections 9.3, 9.4, 9.5 and 9.12 for additional Standards and Criteria that may apply.

1. Signs, marquees and awnings integral to the building ornamentation or architectural detailing shall be retained and repaired where necessary.
2. New signs, marquees and awnings shall not detract from the essential form of the building nor obscure its architectural features.
3. New signs, marquees and awning shall be of a size and material compatible with the building and its current use.
4. Signs, marquees and awnings applied to the building shall be applied in such a way that they could be removed without damaging the building.
5. All signs added to the building shall be part of one system of design, or reflect a design concept appropriate to the communication intent.
6. Lettering forms or typeface shall be evaluated for the specific use intended, but generally shall be either contemporary or relate to the period of the building or its later contributing features.
7. Lighting of signs shall be evaluated for the specific use intended, but generally illumination of a sign shall not dominate illumination of the building.
8. The foregoing notwithstanding, signs are viewed as the most appropriate vehicle for imaginative and creative expression, especially in structure being reused for purpose different from the original, and it is not the Commission's intent to stifle a creative approach to signage.
9. Signage, directory and other locating devices including installation details must be reviewed by the Commission.

10. The design and material of new signs should reinforce the architectural character of the building.
11. No back-lit or plastic signs shall be allowed on the exterior of the building.
12. The placement and configuration of awnings should relate to the facade openings so as not to obscure architectural details.
13. Continuous awnings across multiple windows or wrapping the surfaces of a bay shall not be allowed.
14. Individual awnings shall be mounted within the masonry window opening.
15. Shed-roofed awnings are preferable to those with quarter-round or bull-nosed profiles.
16. Valances shall be flexible, i.e., their bottom edges shall hang free rather than be attached to a horizontal framing member. Rigid valances tend to impart an excessively permanent architectural quality to a fabric-clad building element.
17. Approval of a given sign or awning shall be limited to the owner of the business or building and shall not be transferable; signs shall be removed or resubmitted for approval when the operation or purpose of the advertised business changes.

9.12 Exterior Lighting

Refer to Sections 9.5 and 9.11 for additional Standards and Criteria that may apply.

1. There are three aspects of lighting related to the exterior of the building
 - a. Lighting fixtures as appurtenances to the building or elements of architectural ornamentation.
 - b. Quality of illumination on building exterior
 - c. Interior lighting as seen from the exterior.
2. Wherever integral to the building, original lighting fixtures shall be retained. Supplementary illumination may be added where appropriate to the current use of the building.
3. New lighting shall conform to any of the following approaches as appropriate to the building and to the current or projected use:

- a. Accurate representation of the original period, based on physical or documentary evidence.
 - b. Retention or restoration of fixtures which date from an interim installation and which are considered to be appropriate to the building and use.
 - c. New lighting fixtures which are contemporary in design and which illuminate the exterior of the building in a way which renders it visible at night and compatible with its environment.
4. If a fixture is to be replaced, the new exterior lighting shall be located where intended in the original design. If supplementary lighting is added, the new location shall fulfill the functional intent of the current use without obscuring the building form or architectural detailing.
 5. Interior lighting shall only be reviewed when its character has a significant effect on the exterior of the building; that is, when the view of the illuminated fixtures themselves, or the quality and color of the light they produce, is clearly visible through the exterior fenestration.
 6. Lighting fixtures shall be reviewed. As a Landmark, architectural night lighting is recommended.

9.13 Landscape/Building Site (Includes Handicap Access and Archeology)

Refer to Sections 9.2 B, C, and D regarding treatment of materials. Refer to Sections 9.5, 9.6, 9.10, 9.11 and 9.12 for additional Standards and Criteria that may apply.

1. The general intent is to preserve the existing or later contributing landscape features that enhance the landmark 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 feature between the landmark and its newer surroundings.
3. Original or later contributing site features shall be retained and, if necessary, repaired or otherwise reinforced using recognized preservation methods.
4. Deteriorated or missing site features shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile and detail of installation.

5. When replacement is necessary, it should be based on physical or documentary evidence.
6. If using the same material is not technically or economically feasible, then compatible substitute materials may be considered.
7. New additions/alterations to the site (such as: parking lots, loading docks, ramps, etc.) shall be as unobtrusive as possible and preserve any original or later contributing site features.
8. Removal of non-historic site features from the existing site is encouraged.
9. The exiting landforms of the site shall not be altered unless shown to be necessary for maintenance of the landmark or site. Additional landforms will only be considered if they will not obscure the exterior of the landmark.
10. Original layout and materials of the walks, steps, and paved areas should be maintained. 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 landmark.
11. Existing healthy plant materials should be maintained as long as possible. New plant materials should be added on a schedule that will assure a continuity in the original landscape design and its later adaptations.
12. Maintenance of, removal of and additions to plant materials should consider maintaining existing vistas of the landmark.
13. Disturbance of the terrain around the building or site shall be kept to a minimum so as not to disturb any unknown archeological materials
14. The building site should be surveyed for potential archeological sites prior to the beginning of any construction project.
16. Known Archeological sites shall be protected during any construction project.
18. All planning, any necessary site investigation, or data recovery shall be conducted by a professional archeologist.
19. 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 required level of accessibility;
 - c. Evaluate accessibility options within a preservation context.
20. Because of the complex nature of accessibility the commission will review proposals on a case by case bases. The commission recommends consulting with Preservation Brief 32 "Making Historic Properties Accessible" which is available from the commission office.

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