

# **BLUE CROSS BLUE SHIELD BUILDING**

## **BOSTON LANDMARKS COMMISSION STUDY REPORT**



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

# DRAFT

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

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Rosanne Foley, Executive Director

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Date

Approved by:



November 20, 2023

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Bradford C. Walker, Chair

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Date

Draft report posted on *November 20, 2023*

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 Street, colloquially known as the Blue Cross Blue Shield Building, is significant for its associations with the urban renewal movement that took place in Boston's core downtown area in the 1950s and 1960s. It was the first new building to be 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, and it is especially notable as his first tall building and an early prototype of the idiosyncratic design philosophies that would then 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.<sup>1</sup> Ultimately, that proposal was not selected, but the threat of demolition remains. The exterior maintenance has recently been neglected, with precast concrete cladding falling off the retaining wall along the north edge of the property. The recent threats to Rudolph's diminishing body of work, combined with the 2009 Boston Landmarks Commission's survey update of cultural and architectural resources in Boston's Central Business District which determined that the Blue Cross Blue Shield Building was eligible for listing on the National Register of Historic Places, inspired the petition for designation.<sup>2</sup>

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

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<sup>1</sup> 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>

<sup>2</sup> Boston Landmarks Commission, Landmark Petition Form, Petition No. 255.16, Boston Landmarks Commission Archive.

## **Boston Landmarks Commission**

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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 Street in the Boston Proper zoning district, with Federal Street bordering the parcel to the east. Federal Court, a small parking alley, borders the property to the north and west, and Milton Place bounds the property to the south. The property is closely surrounded by commercial buildings on all sides, with Winthrop Center across Federal Court to the north and west, 100 Summer Street to the southwest, 155 Federal Street across Milton Place to the south, and 160 Federal Street (The United Shoe Machinery Corporation Building, which is a designated Boston Landmark) across Federal Street to the west. A small outdoor plaza creates open space on the south end of the property, with a concrete fountain serving 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 (1960) was designed to provide office space for the Blue Cross Blue Shield Corporation's eight hundred clerical workers.<sup>3</sup> 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 lobby contains two restaurant spaces and a bank. 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 thirteen-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 which had become common in the 1950s. The building is set above street level on a raised podium that contains the basement-level of the building, framed by concrete retaining walls. Approximately one third of the raised platform is dedicated to serving as a public plaza on the west 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**).<sup>4</sup> Wind bracing is accomplished by means of full-height interior concrete shear walls.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup> A third column floats between each set of twin columns, providing additional servicing ducts for the

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

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

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

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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 which extend just past the tops of the panels.

Rudolph used a precast concrete containing a large white quartz aggregate known by the trade name, Mo-Sai (named for the mosaics it resembled). This concrete mix glittered in the sun, aged like traditional masonry, and was very similar to the precast panels that Auguste Perret used in his design of Le Havre.<sup>8</sup> These concrete panels were manufactured off site and attached to the steel frame of the building with clamps. Flat concrete panels of the same texture provide cladding for the single-story loading dock off the west side of the building, and create the retaining 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 European-style plaza to the west of the building is intimately and carefully scaled to fit into the Central Business District's historic surroundings and cramped and angular streets. A fountain wall borders the plaza's western edge, and metal railings (replacements, not original) top the plaza's concrete retaining walls. 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 the plaza's visitors and natural lighting for the basement-level cafeteria below (See **Figure 19**). These have been replaced with rectangular brownstone pavers and round, raised planters, each containing a single tree. Diagonal bluestone paving originally led from the plaza, through two pairs of double-leaf glass doors, and into the two-story-high lobby interior, seamlessly sweeping visitors into the building and making the plaza appear as an extension of the interior space. The lobby houses two restaurant spaces and the entrance 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 Blue Cross Blue Shield Building's exterior has not been significantly altered since its completion in 1960, though the plaza has undergone some major renovations. New pole lights were added to the plaza; however, the original lights suspended from the ceiling above the Federal Street entrance remain. An additional egress from the basement level to the street was added at the southeast corner of the raised plaza. Additional glass doors were added to the east entrance on Federal Street.

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<sup>8</sup> 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 elevation, June 2023. Photo credit: Building Conservation Associates.

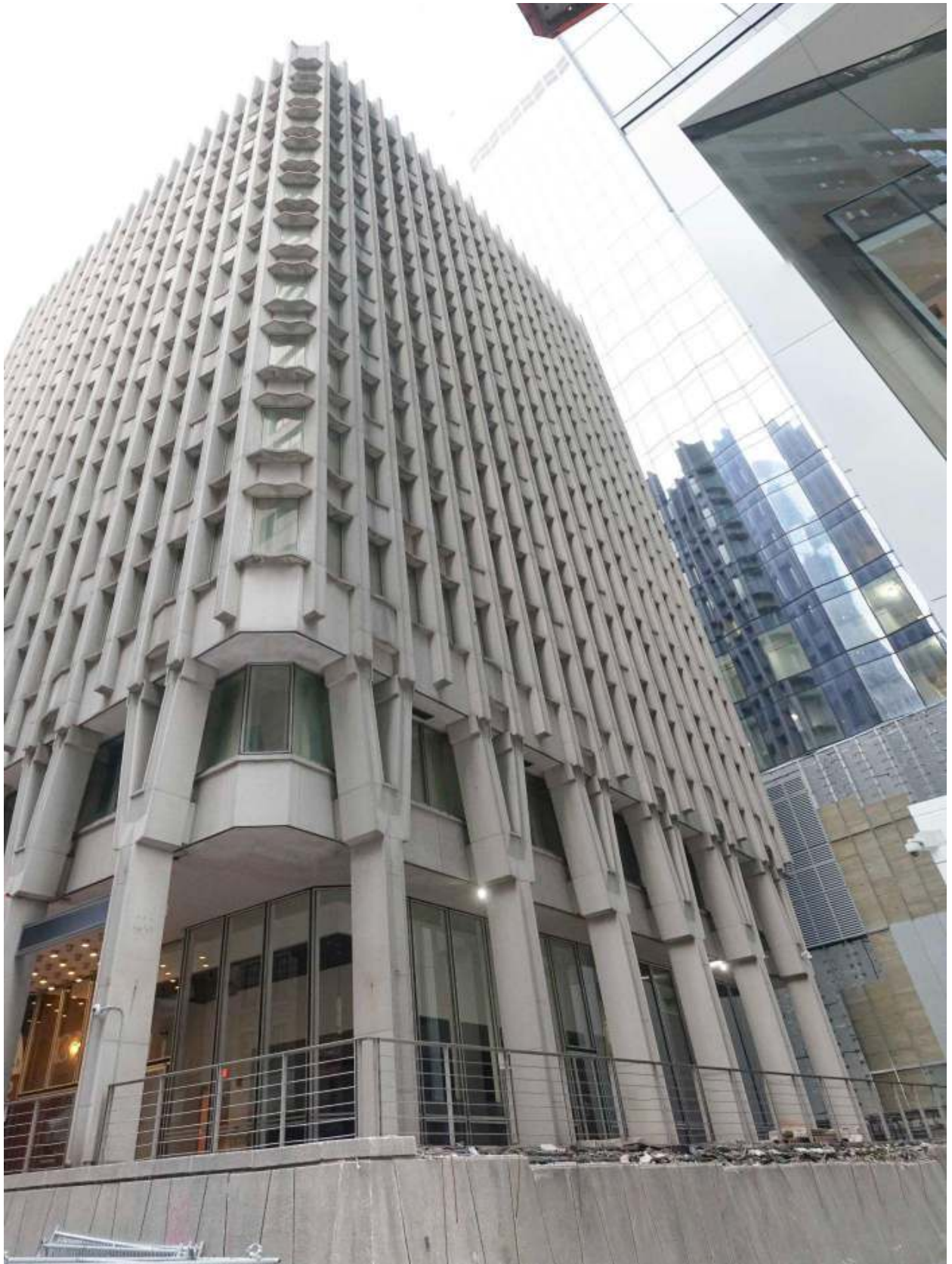
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**Figure 3.** South elevation, June 2023. Photo credit: Building Conservation Associates.



**Figure 4.** South and east elevations, June 2023. Photo credit: Building Conservation Associates.



**Figure 5.** North elevations, June 2023. Photo credit: Building Conservation Associates.



**Figure 6.** East entrance, June 2023. Photo credit: Building Conservation Associates.



**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 credit: 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 credit: 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.

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**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.





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**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.



↑N

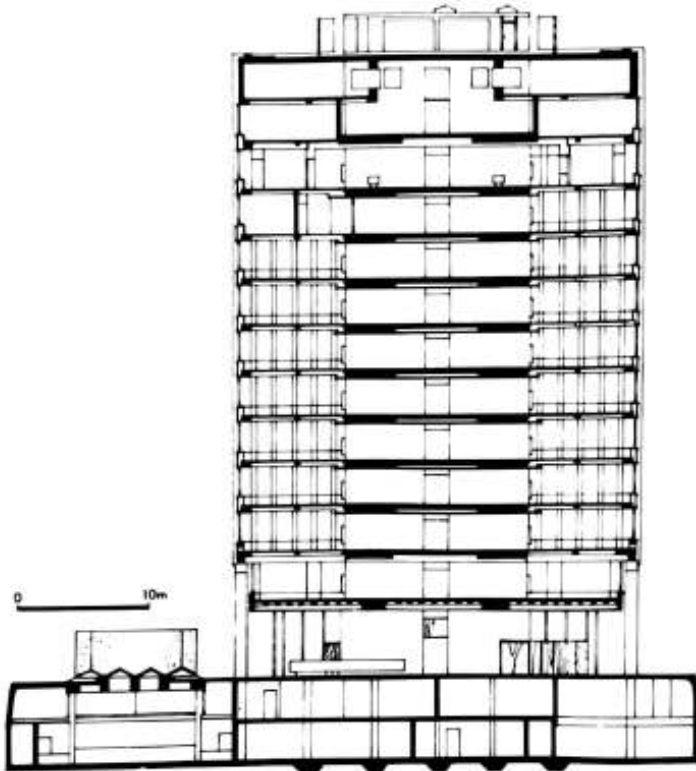
**Figure 13.** 1938 Boston Atlas showing Hunnewell, Du Blois, and Webster as property owners.

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



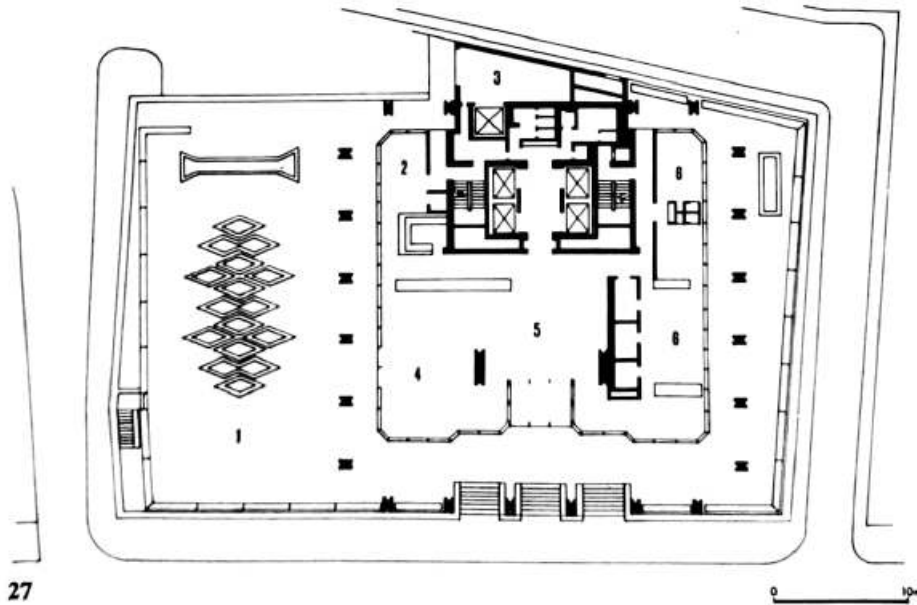
**Figure 14.** Blue Cross building under construction, Financial District, Boston, MA, 1958-1960.

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



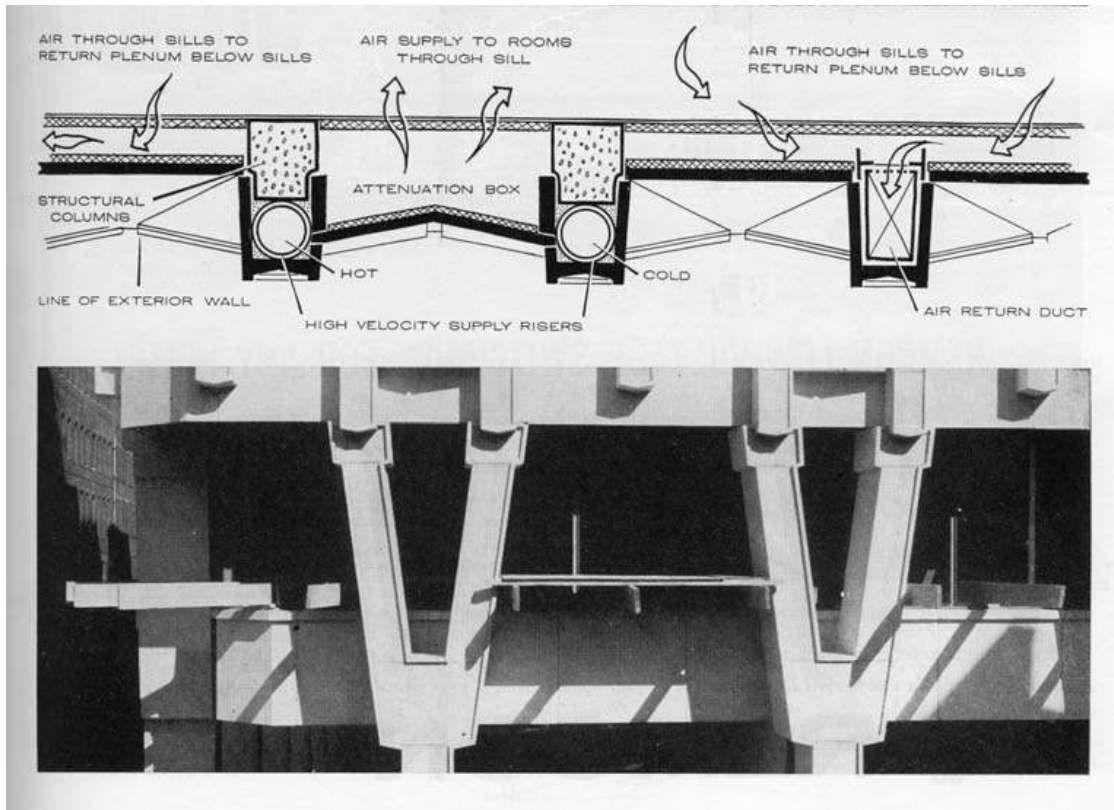
**Figure 15.** Section showing exceptionally thin floor slabs and pyramidal skylights over the cafeteria.

**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, exterior, entrance, Paul Rudolph. Photo credit: Fay Foto Service, 1960.

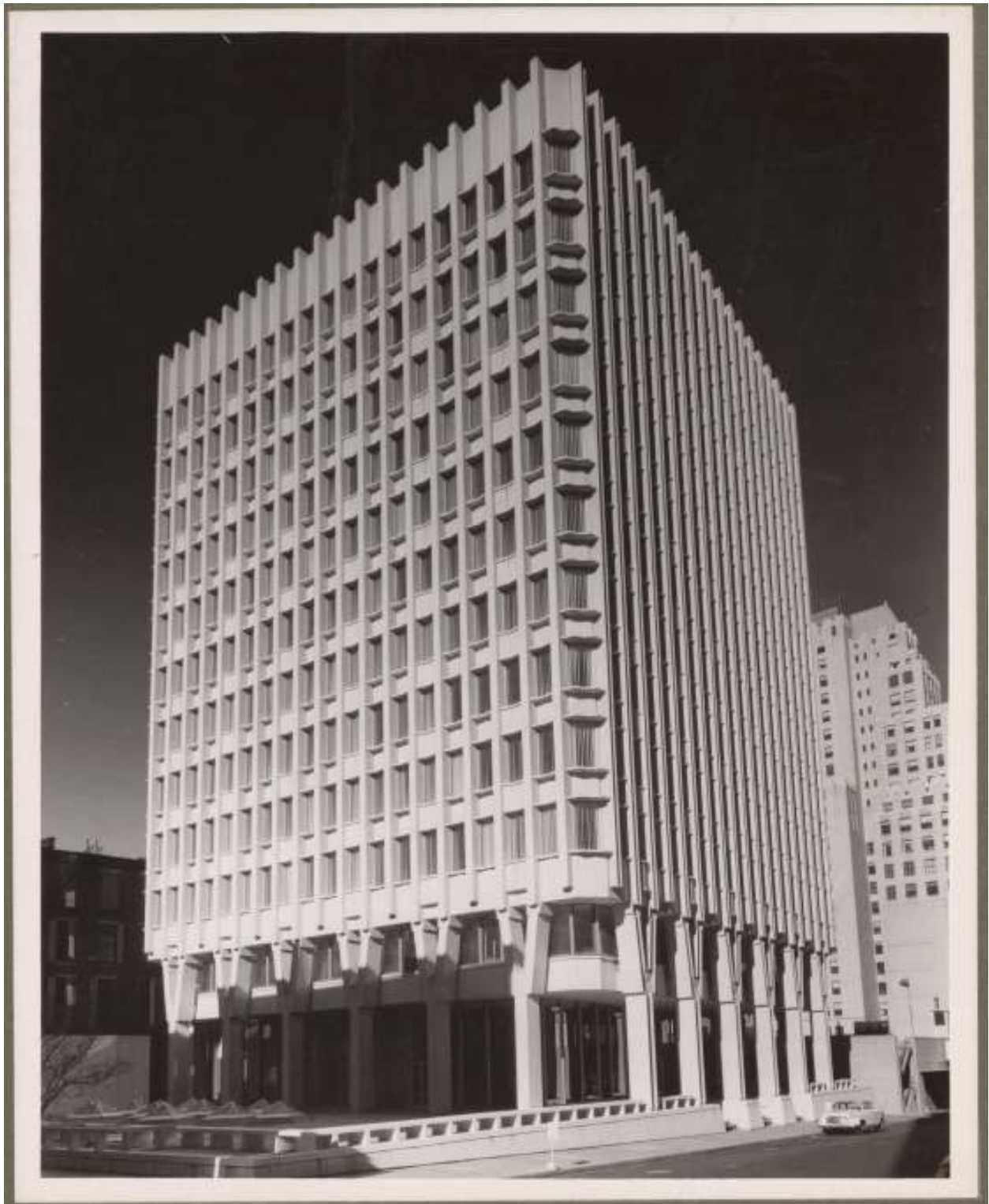
**Source:** Boston Public Library, Boston Pictorial Archive.  
<https://ark.digitalcommonwealth.org/ark:/50959/p841cb410>



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

**Source:** Avery Architectural and Fine Arts Library, Columbia University

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**Figure 20.** Boston, Blue Cross Blue Shield Building, exterior, Paul Rudolph. Photo credit: 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. Photo credit: 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. Photo credit: 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 Street was commissioned by the Blue Cross Blue Shield Corporation. 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, the corporation had over 2 million subscribers and were in need of larger office space for their clerical workers to support their growing network of subscribers.<sup>9</sup> The Blue Cross Blue Shield Corporation had decided against moving to the suburbs, and opted to move from their 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 their 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.<sup>10</sup> Given these challenges, Blue Cross Blue Shield'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 that sold, stored and manufactured wool and leather clothing. 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 Street) and the Edward Bass Electric Company (133 Federal Street).<sup>11 12</sup>

The 1950s were challenging for the City of Boston. With the migration of the city's middle-class families to Boston's suburbs in the aftermath of World War II, Boston saw a reduction in its population from approximately 800,000 to 700,000 from 1950 to 1960. Companies were also moving out of Boston to the suburbs, and Boston's jobs declined from 562,000 in 1947 to 537,000 in 1963. Boston's retail sales fell 5% in the 1950s. The city was forced to raise taxes due to this decline in revenue, creating a negative cycle that caused more residents to leave Boston, which further

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<sup>9</sup> 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.>

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

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

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

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impacted the city's economy. To further 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.<sup>13</sup>

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.<sup>14</sup> John F. Collins succeeded Hynes as Mayor of Boston 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 Boston Redevelopment Authority, 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 short 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 which 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.<sup>15</sup> 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 70s. Many of these nascent philosophies were present in the Blue Cross Blue Shield Building, the design of which allowed

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

<sup>14</sup> *Ibid.*, 16-23.

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



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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 wall. Instead, Rudolph promoted exploring the use of concrete to create expressive exteriors 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.<sup>16</sup>

While he appreciated Walter Gropius's interest in the intersection between architecture, society, and technology, Rudolph found the Bauhaus focus on functionalism and machine-produced buildings to be unsatisfactory.<sup>17</sup> He was drawn to the expressive, regionally inflected modernism of Frank Lloyd Wright, who he would call "the greatest American architect," and he was interested in the ways that historic buildings related to each other and nature.<sup>18</sup> 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.<sup>19</sup> 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.<sup>20</sup> 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.<sup>21</sup>

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.<sup>22</sup> 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 aggregate in his concrete mix to echo the rough texture of the surrounding masonry buildings, and based the four-by-seven-foot window dimensions of the Blue Cross Blue Shield Building on the dimensions of existing windows in nearby buildings.<sup>23</sup> He returned to the Y-shaped support columns from the Doge's Palace, incorporating them into the façade as expressive symbols

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

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

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

<sup>19</sup> Library of Contemporary Architects, "Paul Rudolph," 13.

<sup>20</sup> 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.

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

<sup>22</sup> Timothy M. Rohan, "Challenging the Curtain Wall," 101.

<sup>23</sup> *Ibid*, 93.

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.<sup>24</sup> 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.<sup>25</sup> 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.”<sup>26</sup> 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 versus sculptural play with light and shadow. Rudolph himself was ambivalent on 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 throughout the following decade, across the country, becoming “a standard part of the American construction vocabulary.”<sup>27</sup> The partial and complete demolition of Rudolph’s Shoreline Apartments in Buffalo, NY; Orange County Government Center in Goshen, NY; and the Burroughs Wellcome corporate headquarters in 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 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.

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<sup>24</sup> Ibid, 104.

<sup>25</sup> Ibid, 98.

<sup>26</sup> “Boston Bucks a Trend,” *Architectural Forum* 113 (Dec. 1960), 64-69.

<sup>27</sup> Timothy M. Rohan, “Challenging the Curtain Wall,” 106.

## 3.4 Relationship to Criteria for Designation

The Blue Cross Blue Shield Building at 133 Federal Street 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 Street 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 which best represent some important aspect of the cultural, political, economic, military, or social history of the city, the commonwealth, the New England region or the nation.

The Blue Cross Blue Shield Building is an integral part of Boston's history of urban renewal and shift towards 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 Street (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, 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. In 1975, the building was sold to the State Street Bank and Trust Company, who immediately leased it to the Union Warren Savings Bank. In 1987 it passed to the First National Bank of Boston, and in 1997 to its current owner, BE Realty Limited Partnership.<sup>28</sup> Throughout the building's lifetime, it has remained in use as an office building, with commercial or restaurant space in the ground floor lobby.

### 5.2 Zoning

Parcel number 0304206000 is located in the Boston Proper zoning district, a B-10 General Business subdistrict, and these overlay districts: Planned Development Area (PDA); Restricted Parking District.

### 5.3 Planning Issues

On May 31, 2016 a petition to Landmark the Blue Cross Blue Shield Building at 133 Federal Street was submitted by a Boston Landmarks commissioner. At a public hearing on June 14, 2016 the Boston Landmarks Commission voted to accept the Blue Cross Blue Shield Building for further study.

The previous owners of 133 Federal Street submitted an Article 85 application on February 14, 2007 for the Blue Cross Blue Shield Building at 133 Federal Street. At the hearing on March 13, 2007, the Boston Landmarks Commission found the property to be significant and imposed a 90-day delay until June 11, 2007. Subsequently, the building's owners, the TransNational Company, made the decision to preserve the building.

The Blue Cross Blue Shield Building is located within two PDAs, which means that it can be included in special zoning programs by the Boston Planning and Redevelopment Agency. The current PDAs in effect for this address: the first is an active BPDA program that offers developers and building owners significant tax credits to convert vacant office space into housing in the downtown area. The office-to-housing-conversion pilot program opened in October 2023, and applicants must be admitted to the program by June 2024. This program addresses the post-COVID pandemic real estate glut, which significantly reduced downtown office space rentals while at the same time answering the city's need for increased housing.<sup>29</sup>

The second is a draft PDA called PLAN:Downtown. This study program endeavors "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."<sup>30</sup> Any project occurring within this study area will be reviewed to make sure that it meets PLAN: Downtown goals and objectives.

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

<sup>29</sup> [www.bostonplans.org/news-calendar/news-updates/2023/10/17/bpda-officially-launches-office-to-residential-con](https://www.bostonplans.org/news-calendar/news-updates/2023/10/17/bpda-officially-launches-office-to-residential-con). Accessed November 13, 2023.

<sup>30</sup> Boston Planning and Development Agency: Plan Downtown <https://www.bostonplans.org/planning/planning-initiatives/plan-downtown>. Accessed November 13, 2023.

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Winthrop Centre is a recently completed development project at 115 Winthrop Square.<sup>31</sup> This new 21 story project, adjacent to 133 Federal Street along two sides of Federal Court, lends a massing and scale contrast. The close relationship of the new buildings and 133 Federal Street exhibits changes in Boston's building technology spanning 70 years.

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<sup>31</sup>Boston 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 Street 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 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

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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 Street 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.<sup>32</sup> Before a Certificate of Design Approval or Certificate of Exemption can be issued for such changes, the changes must be reviewed by the Commission with regard to their conformance to the purpose of the statute.

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

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

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

### 8.2 Levels of Review

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

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

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<sup>32</sup> 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](http://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf).

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

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

D. Activities not explicitly listed above:

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

E. Concurrent Jurisdiction

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

## 8.3 Standards and Criteria

The following Standards and Criteria are based on the Secretary of the Interior's Standards for the Treatment of Historic Properties.<sup>33</sup> 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.
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.

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<sup>33</sup> 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](http://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf).

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

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

1. All original or later contributing masonry materials shall be preserved.

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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 shall not be allowed. Use of mechanical saws 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 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.
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.

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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 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 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.

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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.



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

1. The original or later contributing arrangement of window openings shall be retained.
2. Enlarging or reducing window openings for the purpose of fitting stock (larger or smaller) window sash or air conditioners shall not be allowed.
3. Removal of window sash and the installation of permanent fixed panels to accommodate air conditioners shall not be allowed.
4. Original or later contributing window sash, elements, features (functional and decorative), details, and ornamentation shall be retained and, if necessary, repaired by patching, splicing, consolidating, or otherwise reinforcing using recognized preservation methods.
5. Deteriorated or missing window sash, elements, features (functional and decorative), details, and ornamentation should be replaced with material and elements which 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 of sash, elements, features (functional and decorative), details, or ornamentation is necessary, it should be based on physical or documentary evidence.
7. If replacement is approved, replacement sash for divided-light windows shall have through-glass muntins or simulated divided lights with dark anodized spacer bars the same width as the muntins.
8. Tinted or reflective-coated glass shall not be allowed.
9. Metal or vinyl panning of the wood frame and molding shall not be allowed.
10. Exterior combination storm windows shall have a narrow perimeter framing that does not obscure the glazing of the primary window. In addition, the meeting rail of the combination storm window shall align with that of the primary window.
11. Storm window sashes and frames shall have a painted finish that matches the primary window sash and frame color.
12. Clear or mill finished aluminum frames shall not be allowed.
13. Window frames, sashes, and, if appropriate, shutters, should be of a color based on paint seriation studies. If an adequate record does not exist, repainting shall be done with colors that are appropriate to the style and period of the building.

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

1. All original or later contributing entrance elements shall be preserved.
2. The original or later contributing entrance design and arrangement of the door openings shall be retained.

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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 which 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 which 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.

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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 which 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 which date from an interim installation and which are considered to be appropriate to the building and use.

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- d. New lighting fixtures which are differentiated from the original or later contributing fixture in design and which illuminate the exterior of the building in a way which renders it visible at night and compatible with its environment.
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 original or later contributing roof material of the existing building shall be preserved.
2. Original or later contributing roofing materials such as slate, wood trim, elements, features (decorative and functional), details and ornamentation, such as cresting, shall be retained and, if necessary, repaired by patching or reinforcing using recognized preservation methods.
3. Deteriorated or missing roofing materials, elements, features (functional and decorative), details and ornamentation shall be replaced with material and elements which match the original in material, color, texture, size, shape, profile, configuration and detail of installation.
4. When replacement is necessary, it should be based on physical or documentary evidence.
5. If using the same material is not technically or economically feasible, then compatible substitute material may be considered.
6. Original or later contributing roofing materials, elements, features (functional and decorative), details and ornamentation shall not be sheathed or otherwise obscured by other materials.

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7. Unpainted mill-finished aluminum shall not be allowed for flashing, gutters and downspouts. All replacement flashing and gutters should be copper or match the original material and design (integral gutters shall not be replaced with surface-mounted).
8. External gutters and downspouts should not be allowed unless it is based on physical or documentary evidence.

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

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

### **8.3.13 Additions**

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

### **8.3.14 Accessibility**

1. Alterations to existing buildings for the purposes of providing accessibility shall provide persons with disabilities the level of physical access to historic properties that is required under applicable law, consistent with the preservation of each property's significant historical features, with the goal of providing the highest level of access with the lowest level of impact. Access modifications for persons with disabilities shall be designed and installed to least affect the character-defining features of the property. Modifications to some features may be allowed in providing access, once a review of options for the highest level of access has been completed.
2. A three-step approach is recommended to identify and implement accessibility modifications that will protect the integrity and historic character of the property:
  - a. Review the historical significance of the property and identify character-defining features;
  - b. Assess the property's existing and proposed level of accessibility;
  - c. Evaluate accessibility options within a preservation context.

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3. Because of the complex nature of accessibility, the Commission will review proposals on a case-by-case basis. The Commission recommends consulting with the following document which is available from the Commission office: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation Assistance Division; Preservation Brief 32 “Making Historic Properties Accessible” by Thomas C. Jester and Sharon C. Park, AIA.

## **8.3.15 Renewable Energy Sources**

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

## **8.3.16 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 which 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.

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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 buildings 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. Buildings 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 or buildings and the landscape, and be compatible with the historic character of the property. Historic rock outcroppings like puddingstone should not be disturbed by the construction of new site features.
11. Original or later contributing layout and materials of the walks, steps, and paved areas shall 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 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 which 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 encourages removal of non-historic fencing as documentary evidence indicates.
16. 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.

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- 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 with large white quartz aggregate
4. **Roof type, forms, and features:** flat roof, concrete with membrane
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:** Double-leaf glass doors; all-glass walls and windows on levels 1 and 2; single pane vertical glass windows separated by the continuous vertical precast concrete columns acting as mullions



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7. **Steps and/or stoops:** Three sets of eight steps leading up to plaza (ground) level at Federal Street entrance
8. **Storefronts:** Two commercial storefronts inside ground floor lobby
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 with chamfered corners
11. **Relationship of building to lot lines, sidewalks, and streets:** Building sits on a raised platform supported by concrete retaining walls, maintaining the street wall that is common in the Central Business District. The basement level of the building covers the entire lot and provides the platform for the 13 story tower above
12. **Topography and landforms:** The precast retaining walls were designed by Rudolph and made from the same Mo-Sai concrete as the main structure. The subtle pattern contained within references the lines of the Y-shaped piers
13. **Water features:** fountain wall on western edge of plaza, with polygonal fountain basin on the eastern edge of the fountain wall
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 subfloors, which expand beyond the spaces visible on the first floor, likely 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.

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