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The Honorable William Francis Galvin  
Secretary of the Commonwealth  
State House, Room 340  
Boston, MA 02133  
Phone: 617.727.7030  
Email: [cis@sec.state.ma.us](mailto:cis@sec.state.ma.us)

Mr. Michel J. Heffernan  
Secretary, Executive Office for Administration and Finance  
24 Beacon St.  
State House, Room 373  
Boston, MA 02133  
Phone: 617.727.2040  
Email: [contactanf@state.ma.us](mailto:contactanf@state.ma.us)

2 February 2022; By email

Re: Jones Library Renovation, Demolition, New Addition; 43 Amity Street, Amherst, MA; MHC #RC.60731

Dear Secretary Galvin and Secretary Heffernan,

This letter is a last-ditch effort:

- (1) To obtain the legally-required historic preservation review by the Massachusetts Historical Commission (MHC) of designs for a more than **\$35,623,103** demolition/expansion project ("Project") on Amherst's Jones Library, which is listed on the State Register of Historic Places as AMH.259, and
- (2) To get the Massachusetts Board of Library Commissioners (MBLC) to enforce (a) the MBLC's own regulations concerning compliance with the Massachusetts Historic Preservation Law,<sup>1</sup> as well as (b) the terms of its **\$13,871,314** grant contract<sup>2</sup> for this Project with the Town of Amherst ("Town") and the Trustees of the Jones Library ("Jones Trustees"). The MBLC disbursed **\$2,774,263**<sup>3</sup> of this grant to the Town in or about early December 2021.<sup>4</sup>

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<sup>1</sup> Massachusetts General Laws ("M.G.L.") Chapter 9, §§ 26 through 27C.

<sup>2</sup> <https://mblc.state.ma.us/news/news-releases/2021/nr210506.php>.

<sup>3</sup> Title 605, Code of Mass. Regulations ("CMR"), Section 6.09, "Grant Disbursements," subsection (b) 1: "**20%** will be [paid] upon execution of a grant agreement ...." The second **20%** is to be paid in the next fiscal year, after the MBLC "staff accepts the final plans and specifications...." 605 CMR 6.09 (b) 2.

<sup>4</sup> [www.masslive.com/news/2021/12/amherst-town-manager-updates-council-on-municipal-building-projects.html](http://www.masslive.com/news/2021/12/amherst-town-manager-updates-council-on-municipal-building-projects.html).

**I. Request for Your Assistance in Urging the MBLC and MHC to Enforce Massachusetts Historic Preservation Law as to Amherst's Historic Jones Library**

We are past Presidents of the Jones Library Board of Trustees.<sup>5</sup> The Trustees of the Jones Library, Inc., a 501 (c)(3), own the Jones Library's building and land. The Jones Library is nonetheless Amherst's principal public library.

**In light of this matter's public importance, we would greatly appreciate a prompt acknowledgement of this letter.** We appreciate that any consultation with the MBLC and MHC would probably require additional time.

The original Jones Library was built in 1928. It was a revolution in American library architecture. Instead of an Andrew Carnegie "temple of learning" design, it was meant to look and feel like a capacious and elegant home. Despite additions in the 1960s and 1990s, much of the original building still looks and feels that way.<sup>6</sup> Like many Jones Library patrons, we care deeply that this demolition/expansion project preserve its unique and irreplaceable historic features to the greatest possible extent.

We also care that our Commonwealth's public funds of every kind<sup>7</sup> be expended only in accordance with applicable law. It is however fair to say that neither is happening with this Project at present. On the contrary, the Town and Jones Trustees appear to have no plans as of yet to fulfill their contractual obligations to comply with that law, and to submit their current schematic designs to the MHC for its historic preservation review under 950 CMR 71.00, "Protection of Properties Included in the State Register of Historic Places."

We are therefore asking you, Secretary Galvin, and you, Secretary Heffernan, to use your good offices with the MHC and the MBLC, respectively, to protect this irreplaceable architectural treasure of our Commonwealth. These state agencies must ensure that this Project complies with the applicable statutes, and with the applicable MHC and MBLC historic preservation and financial regulations.

**II. This Project Will Predictably Have "Adverse Effects" on Two State Register Properties**

The Jones Library is not only a State Register property. Since 1991 it has been on the National Register of Historic Places as a contributing structure within the Amherst Central Business District.<sup>8</sup>

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<sup>5</sup> N.B.: All links in this letter were verified on or about 30 January 2022. All bold font is supplied.

<sup>6</sup> <https://www.amherstindy.org/2022/01/14/opinion-photo-essay-an-obituary-for-an-old-friend-or-a-celebration-of-the-unique-connecticut-valley-aesthetic/>; see particularly photo frames 4 through 10. Unfortunately, this recent draft Jones Library Historic Structure Report has failed thus far to document the respective current states of the 1928 Library's original rooms. It never even mentions the stunning Director's Office. See also, <https://www.amherstma.gov/DocumentCenter/View/59747/Jones-Library-HSR-Presentation-to-Historical-Commission-and-Library-Trustees-12Jan2022>.

<sup>7</sup> The Jones Trustees also intend to apply for a grant of up to **\$650,000** from the Massachusetts Cultural Facilities Fund. Grant Application to MBLC, <https://www.joneslibrary.org/DocumentCenter/View/1960/Jones-Library-2016-2017-MBLC-Construction-Grant-Round-Application-January-26-2017-PDF>, Additional Funding Sources Attachment, 1<sup>st</sup> unnumbered page.

<sup>8</sup> file:///Users/sarah/Downloads/91001859-2.pdf

This Project will have multiple “adverse effects” on the exterior and interior of the Jones Library’s 1928 Colonial Revival structure. “Adverse effects” include the destruction or alteration of all or part of a State Register property, interior as well as exterior, and alteration of its setting.<sup>9</sup> “Adverse effects” on a State Register property are legally significant. Where state money is to be spent on a project, they trigger an obligation on the part of a project proponent, in consultation with the MHC, to “eliminate, minimize, and mitigate” them.<sup>10</sup> At times, we understand, this can require changes in a project’s design.

The Project’s most recent schematic designs, from October 2020, show that almost all interior walls of the 1928 Jones Library will be removed and/or moved, demolishing original stairs, fireplaces, fireplace surrounds, Philippine mahogany paneling, hand carved woodwork, and room configurations.<sup>11</sup> Founding Jones Library Director Charles Greene’s stately office, where Robert Frost used to present Greene with his signed first editions,<sup>12</sup> will be almost completely demolished. These are all “adverse effects.”

This Project will also alter the Jones Library’s setting by adding two curved, graded walkways from the Amity Street sidewalk to the Jones Library’s main entrance.<sup>13</sup> It will alter the 1928 Library’s Amity Street façade by installing a glass or Plexi-glas type canopy, bolted into the native stonework. This will protrude from the second floor, over the Jones Library’s iconic Connecticut Valley, split curved-pedimented main entrance.<sup>14</sup>

This Project will furthermore affect the setting and possibly the structural integrity of the fragile Strong House, built circa 1754. The Amherst Historical Society owns the Strong House. This, also, is a State Register property (AMH.1000).<sup>15</sup> It occupies the abutting Amity Street parcel to the Jones Library’s west.

The Town and Jones Trustees have never afforded the MHC the opportunity to identify these or any of this Project’s other “adverse effects.” Nor, accordingly, has the MHC conducted its regulatory

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<sup>9</sup> 950 CMR 71.05 (a) – (e): “Criteria of Adverse Effect.”

<sup>10</sup> 950 CMR 71.00, “Protection of Properties Included in the State Register of Historic Places,” Section 71.02, “Scope, Purpose and Participants,” subsection (1).

<sup>11</sup> [Schematic Sustainability Study---Updated Presentation by Finegold-Alexander Architects-October-8-2020-PDF \(joneslibrary.org\)](https://www.joneslibrary.org/files/2020/10/Schematic-Sustainability-Study---Updated-Presentation-by-Finegold-Alexander-Architects-October-8-2020-PDF.pdf) pp. 14-18.

<sup>12</sup> In 2009, the Jones Library was designated as a National Literary Landmark, in honor of Robert Frost’s long association with the Jones Library and his friendship with Charles Greene. See [https://www.ala.org/united/products\\_services/literarylandmarks/landmarksbystate/landmarksbystate#massachusetts](https://www.ala.org/united/products_services/literarylandmarks/landmarksbystate/landmarksbystate#massachusetts)

<sup>13</sup> See Grant Application to MBL, footnote 2, frame 506 of 526 (Site plan G003).

<sup>14</sup> See October 2020 Schematic Designs, footnote 11 above, Second Floor Plan, frame 16 of 30. Note: In 2017, the Jones Trustees executed a Historic Preservation Restriction Agreement on the Jones Library’s exterior, in exchange for **\$140,000** in Community Preservation Act historic preservation funds received in 2010 – 2011. These funds paid to restore the Jones Library’s original slate roof, and original six chimneys. We understand that this Restriction Agreement is nearly ready for final submission to the MHC. That the Project’s alterations to the Jones Library’s Amity Street exterior comport with this Restriction Agreement seems unlikely in the extreme. That alone would require the Project’s redesign.

<sup>15</sup> Some of the basement walls of the Strong House are of unmortared sandstone. In the early 1990s, vibratory damage from demolition of the Jones Library’s wood frame 1960s addition required bracing the Strong House foundation. There are neither plans nor financing for bracing the Strong House foundation to protect it from vibratory damage caused by this Project’s intended demolition of the Jones Library’s 1993 brick addition.

consultation process with the Town, Jones Trustees, and members of the Amherst area public about ways to “eliminate, minimize, and mitigate” them.<sup>16</sup>

### III. The Amherst Town Manager, Jones Library Director, and MBLC Have Been on Notice Since 2016 that the Jones Library is a State Register Property and is on the National Register

The Amherst Town Manager, the Jones Library Director, and the MBLC have been on notice since 2016 that the Jones Library is a State Register property. They have likewise been on notice of the information that the MHC therefore requires as to this Project. In a letter dated 23 December 2016 (“2016 MHC Letter”), with courtesy copies to the MBLC, the Jones Library Director, and others,<sup>17</sup> the MHC informed the Amherst Town Manager:

**[T]he Jones Library is located within the Amherst Central Business District and listed in the National and State Registers of Historic Places.**<sup>18</sup>

This MHC letter notes that, on the MBLC’s and MHC’s required “Project Notification Form,” the Trustees reported the Project as “**involving limited demolition of the original 1928 library structure, the demolition of the 1993 addition, and construction of a new addition....**” This 2016 MHC Letter further states:

**The MHC requires complete photographic coverage of proposed work locations on the exterior and the interior ... keyed to sketch maps or floor plans.... a detailed project description along with an indication of what exterior and interior sections of the building will be removed and whether they will be stored for future reuse.... existing and proposed perspective illustrations of the project, keyed to a sketch map.**<sup>19</sup>

*For more than five years, the Town, the Jones Library Director, and the Jones Trustees have failed to provide any of this information to the MHC. Instead, in their grant application to the MBLC in January 2017, they said: “We now propose to renovate the 1928 structure....”<sup>20</sup> This implied that the Project would leave the 1928 structure intact. Nonetheless, their schematic designs included in that grant application showed that the Project would still produce “adverse effects” on the 1928 Jones Library.<sup>21</sup>*

Further, the Jones Trustees’ grant application wrongly represents that the 1928 Jones Library is on neither the National nor the State Register of Historic Places. Item 8 on the MBLC’s grant application

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<sup>16</sup> 950 CMR 71.02 (1).

<sup>17</sup> See Attachment A, “2016 MHC Letter.” Its courtesy copy to the Jones Library Director should certainly have sufficed to put the Jones Library Trustees on notice, as well. Courtesy copies went also to Collier’s International, which is still the Owner’s Project Manager, and to past Trustee President Sarah McKee.

<sup>18</sup> MHC 2016 Letter, Attachment A.

<sup>19</sup> *Id.*

<sup>20</sup> <https://www.joneslibrary.org/DocumentCenter/View/1960/Jones-Library-2016-2017-MBLC-Construction-Grant-Round-Application-January-26-2017-PDF>, page 5.

<sup>21</sup> *Id.*, pages 512 – 516. These schematic designs have since been modified. E.g., the space occupied by Founding Director Charles Greene’s office is no longer to be used for an automatic book-sorting machine. Now much of its party wall with the adjoining original room is to be demolished, and the space used for a Circulation Work Area. [Schematic Sustainability-Study--Updated-Presentation-by-Finegold-Alexander-Architects-October-8-2020-PDF \(joneslibrary.org\)](#), page 15.

form requires this information. Nonetheless, the Jones Trustees' and Town's grant application left these mandatory fields blank:

8. The existing building to be renovated is:

On the National Register of Historic Places

On the Massachusetts Historical Commission's Inventory of Historic and Archaeological Assets [Includes State Register of Historic Places]

In an historic district.<sup>22</sup>

True, the Jones Library is in an historic district. But it is also on both the National and State Registers of Historic Places.<sup>23</sup> Whether this misrepresentation was in good faith, in error, or something else is irrelevant. Likewise irrelevant is whether this misled the MBLC into thinking that the MHC's involvement was no longer required.

The Jones Trustees and the Town had, and still have, a regulatory and contractual obligation to provide the MHC with the information required for the MHC's historic preservation review.

#### **IV. The Jones Trustees and Town Have a Contractual Obligation to Provide the MHC with the Historic Preservation Information That It Requires**

The MBLC regulations provide:

To be eligible to sign a grant contract and agreement with the [MBLC], the Applicant will...agree to the following assurances set forth in the construction grant agreement ...

that **the Applicant will comply with** M.G.L. c. 9, §§ 26 and [sic] 27C and 950 CMR 71.00: ***Protection of Properties Included in the State Register of Historical [sic] Places*** and any additional [MHC] legal and regulatory requirements, including that which affords the [MHC] the opportunity to review and comment as early as possible in the planning stages of the project.<sup>24</sup>

"As early as possible in the planning stages of the project" was in 2016, more than five years ago. Yet the current Building Project timeline on the Jones Library website shows no schedule for submission to the MHC of the required information. Instead, it shows "Schematic Design and Development (22 weeks)" starting November 2021; "Construction Documents (30 weeks)" starting March 2022"; etc.<sup>25</sup>

This schedule has obviously slipped by several months, as construction project schedules frequently do. Yet it is clear that this schedule allots no time whatsoever for the MHC's mandatory historic preservation review. If that takes fewer than 12 weeks, starting from when the Town and Jones Trustees begin to assemble the information that the 2016 MHC Letter requires, it will be remarkable.

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<sup>22</sup> Id., page 9.

<sup>23</sup> <https://mhc-macris.net/#!/queryresults>; AMH-249.pdf.

<sup>24</sup> 605 CMR 6.05: "Conditions of Eligibility," subsection (2)(d) 21.

<sup>25</sup> <https://www.joneslibrary.org/ImageRepository/Document?documentID=7553n>

## V. The MHC Requires Adequate Documentation of “Adverse Effects,” Public Participation

The MHC has “30 days from receipt of an adequately documented Project Notification Form” in which to determine the Project’s “adverse effects” on a State Register property.<sup>26</sup> We are unaware even of any start at assembling the detailed data essential for such “adequate document[ation].”

The MHC regulations then require a consultation process to “to consider project alternatives that could eliminate, minimize, or mitigate adverse effects” on the two State Register properties at issue here.<sup>27</sup> In addition, the MHC’s regulations encourage “the views of the public” as part of its consultation process.<sup>28</sup>

**Notice to the public** under 950 CMR 71.11 **should adequately inform the public** of preservation issues **in order to elicit informed public views on issues that can be considered and resolved, when possible**, in the decision making process.<sup>29</sup>

The COVID during the past two years would have required creative ways to conduct this process . Before that, however, this Project had already been under way for more than three years. We would know if there had been any attempt at any time to involve the Amherst area public in such a process. There has been none. This, also, shows that there has been no MHC process.

If and when there is one, it will almost certainly result in modifications of the project’s schematic designs. This is because the Town and Jones Trustees “must adopt all prudent and feasible means to eliminate, minimize, or mitigate adverse effects.”<sup>30</sup> Only then will it be appropriate to schedule “Schematic Design and Development” and the ensuing stages of the Project.

At the meeting of the Jones Trustees’ Building Committee on 27 January 2022, the Library Director noted that conferring with the MBLC should be done ASAP: “They have some concerns.”<sup>31</sup> One can hope that these “concerns” refer to the need for the Town and Jones Trustees to provide the MHC with the information specified in the 2016 MHC Letter, and to participate in good faith in the MHC’s process to “eliminate, minimize, and mitigate” this Project’s many “adverse effects.”

## VI. Colliers International, the Owner’s Project Manager, Has Failed Thus Far to Ensure the Project’s Compliance with Historic Preservation Law

One big disappointment in following this Project since March 2016 has been the failure of Colliers International, the OPM, to see that the Town and Jones Trustees comply with applicable historic preservation law. As you know, the OPM is “a professional who meets state qualifications to represent the Applicant from predesign through post-construction phases by providing independent and competent advice on all aspects of a building project. Responsibilities include ... monitoring all phases of design and construction.”<sup>32</sup>

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<sup>26</sup> 950 CMR 71.07, “Review of Projects,” subsection (2)(a), “Identification of State Register Properties”

<sup>27</sup> 950 CMR 71.07, “Review of Projects,” subsection (3), “Consultation Process.”

<sup>28</sup> Id.

<sup>29</sup> 950 CMR 71.02 (2)(d), “The Public.”

<sup>30</sup> 950 CMR 71.02 (1), “Scope and Purpose.”

<sup>31</sup> <https://www.amherstindy.org/2022/01/28/jones-library-building-committee-chooses-officers-recommends-field-trip/>

<sup>32</sup> 605 CMR 6.02, “Definitions.”

"[A]ll aspects of [this] building project" necessarily include its compliance with the MBLC and MHC historic preservation requirements. We understand that any OPM must be licensed by the Commonwealth. Presumably the OPM on a project concerning a State Register property, and more than **\$13 million** in Commonwealth funding, should therefore make sure that the project proponents are aware of the applicable Massachusetts law and abide by it.

It would have taken Colliers International just a quick check of the Secretary of the Commonwealth's MACRIS data base to see that the Jones Library is a State Register property. In addition, the MHC copied Colliers International specifically on its 2016 MHC Letter.<sup>33</sup> So Colliers International was on notice, for that reason, of the Jones Library's State Register status, as well as being on notice of the detailed information that the MHC requires from the Town and Jones Trustees.

Furthermore, a Colliers International representative attended meetings in the Jones Library that one or the other of us attended. He was quite competent to read the schematic designs submitted to the MBLC with the Town's and Jones Trustees' MBLC grant application, and to compare them with the 1928 Jones Library building as it is. He could therefore have seen that these schematic designs involved "adverse effects" on this State Register property, and that these designs accordingly required MHC historic preservation review. The OPM's failure so far to ensure the Project's compliance would seem to be a dereliction of the OPM's responsibility.

#### **VII. Continued Failure to Provide the MHC with Required Data and to Participate in its Review Process Will Place the Jones Trustees and Town in Breach of Their MBLC Grant Contract**

The MBLC's own regulations provide:

**Failure by the Applicant to comply with any of the assurances in the grant contract and agreement constitutes a breach of the agreement. No further disbursements will be made by the [MBLC], and all funds previously advanced to the Applicant, plus interest, must be returned.**<sup>34</sup>

As noted above, one of the assurances in the MBLC construction grant contract requires the Jones Trustees and Town to provide the information needed for the MHC's historic preservation review.<sup>35</sup> If they fail to do so, this "constitutes breach of the agreement," and the Town will have to return the **\$2,774,263** that the MBLC has already disbursed, plus interest.<sup>36</sup> Even if the Town and Trustees have already spent some of this money, they still must reimburse it all.

We understand that any such returned MBLC grant disbursements are paid into the General Fund, rather than to the MBLC.<sup>37</sup> *This appears to be a disincentive for the MBLC's enforcement of its own contracts.* For instance, the MBLC failed to require return of the Jones Trustees' and Town's Planning

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<sup>33</sup> See Attachment A. The MHC directed the OPM's courtesy copy specifically to Ed Alegre, then evidently head of Colliers International's Valuation and Advisory Services Business. See <https://www.prnewswire.com/news-releases/commercial-real-estate-industry-veteran-ed-alegre-joins-colliers-international-159410885.html>

<sup>34</sup> 605 CMR 6.05, "Conditions of Eligibility," subsection (2)(e).

<sup>35</sup> 605 CMR 6.05 (2)(d) 21.

<sup>36</sup> 605 CMR 605 (e).

<sup>37</sup> Comment by an unidentified MBLC staff member at a Zoomed MBLC Board Meeting, autumn 2021.

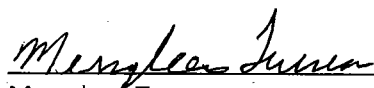
and Design Grant, awarded in 2014,<sup>38</sup> even though the Town and Jones Trustees failed to comply with the analogous Planning and Design Grant regulatory and contractual requirement as to the **Protection of Properties Included in the State Register of Historical [sic] Places.**<sup>39</sup>

The MBLC must not similarly countenance any breach, by the Town of Amherst and Jones Trustees, of their **\$13,871,314** construction grant contract.

We therefore urge those who can influence the MBLC and the MHC to urge:

- (1) That the MBLC not make the second or any subsequent grant disbursement until the Town and Jones Trustees provide the MHC with the data specified in the 2016 MHC letter; participate fully in the MHC's historical preservation review process; and, if necessary, modify their schematic designs for this Project accordingly; and
- (2) That the MHC not authorize any Historic Rehabilitation Tax Credits for this Project until the Town and Jones Trustees have complied fully as indicated in (1), above.

Sincerely,



Merrylees Turner  
Past President, Jones Library Board of Trustees  
30+ year member, Amherst Town Meeting



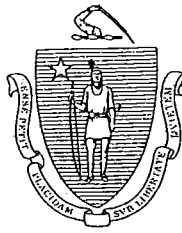
Sarah McKee  
Past President, Jones Library Board of Trustees  
D.C. Bar No. 954990

Cc: Brona Simon, Director, MHC ([mhc@sec.state.ma.us](mailto:mhc@sec.state.ma.us))  
James Lonergan, Director, MBLC ([james.lonergan@mass.gov](mailto:james.lonergan@mass.gov))  
Lynn Griesemer, Chair, and Amherst Town Council ([towncouncil@amherstma.gov](mailto:towncouncil@amherstma.gov))  
Austin Sarat, Chair, and Jones Library Board of Trustees ([trustees@joneslibrary.org](mailto:trustees@joneslibrary.org))  
Jones Library Director Sharon Sharry ([sharrys@joneslibrary.org](mailto:sharrys@joneslibrary.org))  
Jane Wald, Chair, and Amherst Historical Commission (via liaison Benjamin Breger, Senior Planner, Town of Amherst Planning Department: [bregerb@amherstma.gov](mailto:bregerb@amherstma.gov))  
Amherst Town Manager Paul Bockelman ([TownManager@amherstma.gov](mailto:TownManager@amherstma.gov))  
Jones Library Building Committee (via Angela Mills, Clerk: [millsa@amherstma.gov](mailto:millsa@amherstma.gov))  
Ellen Anselone, Finegold Alexander Architects ([eka@faainc.com](mailto:eka@faainc.com))  
David Goodhue, Executive Managing Director - Boston, Colliers International ([David.Goodhue@colliers.com](mailto:David.Goodhue@colliers.com))  
Michael J. Bobbitt, Executive Director, Mass. Cultural Council ([Michael.Bobbitt@art.state.ma.us](mailto:Michael.Bobbitt@art.state.ma.us))  
Jay Paget, Program Director, Mass. Cultural Council ([Jay.Paget@art.state.ma.us](mailto:Jay.Paget@art.state.ma.us))

<sup>38</sup> Jones Library Award Letter from MBLC, 6 June 2014. See <https://www.joneslibrary.org/DocumentCenter/View/371/Jones-Library-Award-Letter-from-MBLC-June-6-2014-PDF>.

<sup>39</sup> 605 CMR 6.05, "Conditions of Eligibility," subsection (2)(c), "For planning and design projects," 13: "that **the Applicant will comply with** M.G.L. c. 9, §§ 26 and [sic] 27C and 950 CMR 71.00: **Protection of Properties Included in the State Register of Historical [sic] Places** and any additional [MHC] legal and regulatory requirements, including that which affords the [MHC] the opportunity to review and comment as early as possible in the planning stages of the project."





The Commonwealth of Massachusetts  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

December 23, 2016

Paul Bockelman  
Town Manager  
Town of Amherst, Massachusetts  
Town Hall  
4 Boltwood Avenue  
Amherst, MA 01002

RE: Jones Library Renovation, Demolition, New Addition; 43 Amity Street; Amherst, MA; MHC# RC.60731

Dear Mr. Bockelman:

The Massachusetts Historical Commission (MHC) has received information submitted from The Jones Library, received November 23, 2016, concerning the proposed project referenced above. As you are aware, the subject property at 43 Amity Street, historically known as the Jones Library, is located within the Amherst Central Business District and listed in the National and State Registers of Historic Places. After a review of the information submitted, MHC staff have the following comments.

The proposed project involving limited demolition of the original 1928 library structure, the demolition of the 1993 addition, and the construction of a new addition is described in the Project Notification Form that was submitted to this office, received November 23, 2016.

At this time, the MHC is unable to determine what effect the proposed project will have on the historic property and district listed above. The MHC requests the following information in a hard-copy format. The MHC requires complete photographic coverage of proposed work locations on the exterior and the interior of the library, keyed to sketch maps or floor plans. Please provide a detailed project description along with an indication of what exterior and interior sections of the building will be removed and whether they will be stored for future reuse. Please provide existing and proposed perspective illustrations of the project, keyed to a sketch map.

The MHC requests that a copy of the above requested information be submitted to Michael Hanke, Chairperson, Amherst Historical Commission, 4 Boltwood Avenue, Amherst, MA 01002. The MHC also requests that a copy of the above requested information be submitted to Sarah McKee, 9 Chadwick Ct, Amherst, MA 01002-2825 and Michael Burkart, Save Our Library Committee, 92 Aubinwood Road, Amherst, MA 01002. The MHC looks forward to receiving and reviewing the above requested information and any comments from the entities indicated above.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), and M.G.L. Chapter 9, Section 26-27C, as amended by Chapter 254 of the Acts of 1988 (950 CMR 71.00). Please do not hesitate to contact me at this office if you have any questions.

Sincerely,

Ryan T. Maciej  
Preservation Planner  
Massachusetts Historical Commission

cc: Sharon Sharry, Jones Library  
Dianne Carty, MBLC  
Anita Walker, MCC  
Michael Hanke, Amherst Historical Commission  
Ed Allegre, Colliers International  
Sarah McKee  
Michael Burkart, Save Our Library Committee