

Neighbors for Coolidge Corner  
Brookline, Massachusetts 02446

June 19, 2016

Mr. Jesse Geller, Chairman  
Brookline Zoning Board of Appeals

Re: 40 Centre Street

Dear Mr. Geller,

As members of a Steering Committee for a large group of concerned neighbors of the proposed 40 Centre Street development, we appreciate the opportunity provided by Ms. Morelli to respond to David King's June 15, 2016 letter to you concerning historic preservation.

We acknowledge and appreciate the effort of the Brookline Preservation Commission (BPC) and staff in reviewing a demolition application for this property submitted by the previous owner, Dr. Becker, in 2015. This resulted in the preparation of a BPC preliminary study report that determined the property met two criteria for an initial determination of National Register (NR) significance, Criteria C and D. Please note that under normal circumstances, a property needs to meet only a single criterion to be considered eligible for NR listing.

The record of the ZBA meeting of May 23, 2016 shows that one of our members asked why the BPC did not follow up on this initial determination of significance. It is acknowledged that BPC is short-staffed, and so it was pointed out that this may be appropriate work for a preservation consultant.

Mr. King's June 15 letter substantiates the point made by our group at the May 23 hearing: the BPC took no action determining NR eligibility for 40 Centre Street over the 10 months since the demolition stay was granted. Instead, it drew from past experience with two other 40B properties, Hancock Village and 21 Crowninshield Street, and concluded that there was no point in pursuing the NR eligibility question for 40 Centre Street. One reason given is that the MHC requires a letter of support from the property owner, which the BPC does not have for 40 Centre Street. The other reason is that these NR eligible and/or State Register listed properties were not protected in face of recent 40B challenges.

In support of the BPC's decision to take no action to determine NR eligibility, two attachments were provided. The first, a letter from the MA State Historic Preservation Officer to the Chief of the NRHP, refuses to respect a request from the Chief to review the NR nomination form for

Hancock Village prepared by the BPC. We hope that the BPC will share with us the Chief's reply to the MHC concerning their policy for reviewing NR nominations as this may influence the BPC's emerging new NR nomination policy in general, and 40 Centre Street in particular.

The second attachment, a memorandum from Town Counsel Jonathan Simpson, indicates that in fact the MHC will review the 40 Centre Street Project Notification Form (PNF) for possible adverse effects once the project has received a comprehensive permit. This memorandum indicates that "Town bodies involved in reviewing the design of the process, such as the ZBA..." will have the opportunity to provide input into this process. The ZBA has the old BPC preliminary study indicating that the property probably meets federal and state register criteria of significance. Will you bring this study, which Brookline taxpayers paid for, to the attention of the MHC during the review period? Have you determined what, if any, impact the demolition will have on nearby State Register properties, to bring to the MHC's attention?

Sincerely (in alphabetical order),



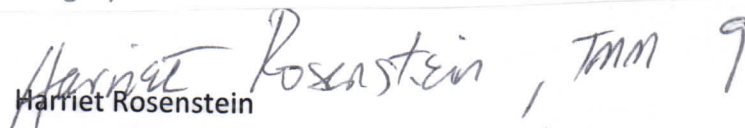
Derek Chiang



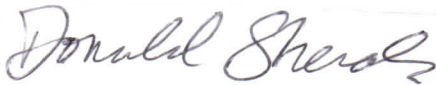
Steven Pender



Margery Resnick



Harriet Rosenstein



D. Sherak

Cc: David King, Chairman, BPC