



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

October 5, 2021

William Joyce
Executive Director
Massachusetts Architectural Access Board
1000 Washington Street, Suite 710
Boston, MA 02118

RE: Great Blue Hill Observation Tower, Summit Road, Blue Hills Reservation, Milton, MA;
MHC# RC.61435

Dear Mr. Joyce:

The Massachusetts Historical Commission (MHC) is in receipt of information from the Department of Conservation and Recreation (DCR) regarding the project referenced above, received on August 26, 2021 and September 27, 2021. The staff of the MHC have reviewed the information submitted and have the following comments.

The DCR proposes to make site improvements to the Great Blue Hill Observation Tower to improve access to the historic site. DCR proposes to construct an interior ramp in the west end of the pavilion and by raising the level of the terrace through installation of new flagstone pavers to provide an accessible route to the interior of the tower pavilion. The DCR also proposes to replace damaged historic railings at the east tower stair with compliance railings and replace the interior railing at the Observation Level above the stairwell opening with a new railing that meets modern codes. DCR also proposes to repoint the existing rubble stone floor in front of the fireplace to minimize vertical reveal, with some taller stones replaced with flatter stones. DCR proposes to resurface the pavilion terrace with new bluestone pavers to improve access to this area.

The Great Blue Hill Observation Tower is listed in the National and State Registers of Historic Places. The 35-foot tall tower stands to the northeast of the summit of Great Blue Hill in the Blue Hills Reservation. The tower and connected pavilion were built between 1937 and 1938 by the Civilian Conservation Corps (CCC) as part of a summit landscape dedicated in honor of landscape architect Charles Eliot. Its rubble stone walls combined with heavy timber construction and overhanging slate roofs is very characteristic of CCC and Works Progress Administration rustic "parkitecture" of the era. The tower, pavilion, and pavilion terrace blend seamlessly into the exposed, undulating stony ledge of the summit through the use of native stone in the structure's walls, retaining walls, and rough-cut steps.

The MHC supports DCR's proposed plan. If granted, a MAAB variance would allow a level of compliance without removal or alteration of historic features and significant changes to the iconic tower, pavilion, and terrace. MHC understands that the Milton Historical Commission and the Milton Commission on Disability also support this project.

The MHC believes that if the MAAB variances are not granted, the removal of the original stone stairs and replacement with new, modern stairs would significantly detract from the tower's architectural integrity and its historic rustic character. The addition of numerous handrails to the exterior stairs to meet code would detract from

the simple, rustic architectural character of the pavilion and pavilion terrace. Installing handrails would also irreversibly impact the historic granite walls and steps, exposing the stone to potential freeze-thaw damage. Finally, modifying the area in front of the fireplace would require the removal of this substantial original, distinctive feature of the pavilion that visually emphasizes the interior architectural focal point of the fireplace.

The proposed project will have "no adverse effect" (950 CMR 71.07(2)(b)(2)) on the Great Blue Hill Observation Tower. The MHC respectfully requests that the Massachusetts Architectural Access Board grant the variance requests.

Your consideration of this matter is greatly appreciated. Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Jeffrey Harris, DCR
Milton Historical Commission
Diane DuTillio Agostino, Milton Commission on Disability