International Trust Company Building
45 Milk Street, Boston
Boston Landmarks Commission Study Report
Report of the Boston Landmarks Commission

on the potential designation of

The INTERNATIONAL TRUST COMPANY BUILDING

as a Landmark under Chapter 772 of the Acts of 1975

Revised February 28, 1978 and
April 25, 1978
CONTENTS

1.0 Location of Property
2.0 Description of Property
3.0 Significance
4.0 Economic Status
5.0 Planning Context
6.0 Alternative Approaches
7.0 Recommendations
8.0 Bibliography
9.0 Standards and Criteria
1.0 LOCATION OF THE PROPERTY

1.1 Address: 39-47 Milk Street, Boston, Ward 3. The assessor's parcel number is 4662.

1.2 Area in which the Property is located:

The building is located on Milk Street near the heart of the Downtown Financial District. It is in close proximity to Washington Street and the Old South Church, Post Office Square, and two major new bank buildings, and is within five minutes of Park Street, Government Center, and the Washington Street shopping area. The immediate area is characterized by a mix of 4 and 5 story post-fire commercial buildings, 8 to 15 story turn-of-the-century elevator office buildings, and modern high-rise office towers.

1.3 Map showing location: attached
2.0 DESCRIPTION OF THE PROPERTY

2.1 Type and Use:

The parcel is 7,200 square feet in extent, and contains a 9 story elevator office building which occupies the entire site on the south side of Milk Street between Arch and Devonshire. The building is now vacant.

2.2 General Description:

The International Trust Company Building is a nine-story office building, five bays wide and deep, measuring approximately 100 feet on each side and 125 feet from sidewalk to cornice line. It is constructed of load-bearing masonry piers and walls set into a reinforced concrete foundation, with floors supported on steel I-beams. This proto-skeleton frame is faced with buff-colored Indiana limestone and has plinths of polished Quincy granite and a flat, composition roof.

Designed by the prominent Boston architect, William G. Preston, the building was built in two stages. The original portion, completed in 1893, was 8 stories high and 2 bays wide on Milk Street, extending the full five bays back along Devonshire. Built by the noted Boston firm of Gooch & Pray, this earlier building used portions of the foundation and internal structure of its predecessor, the five-story 'Iron Building'.

Preston enlarged the 1893 building substantially in 1906, by extending it along Milk to Arch Street (adding a central bay and two end bays which duplicated the two originals) and adding a story to the top. In the process, he converted the originally offset arched entrance on the Milk Street facade to a window, and replaced the earlier heavy, bracketed stone cornice with a lighter copper one (which is now missing). This addition matched the original scrupulously, in terms of material, style, and ornament, so that there are now no noticeable seams separating old from new construction. The addition did, however, alter the building's overall proportions, making it appear blockier and less columnar.

Contemporary references to the building's style describe it as "a combination of Renaissance and Romanesque", or, more simply, "Roman Renaissance", although to the modern eye the 'Renaissance' or Beaux-Arts elements clearly predominate. The five arcaded two-story window bays on the bottom floors of each of the three dressed facades form the building's base. These are separated by modified Corinthian pilasters and punctuated at the top with baroque cartouches, and the section is topped with a projecting, molded string course. Due to a sloping grade towards Devonshire Street, the basement floor along that facade is at street level. Low entranceways decorated with ornate cast-iron grillwork at the Milk/Devonshire corner lead directly to this basement floor, where the safe deposit vaults were originally located.
The rectangular central entrance on Milk Street is topped by a heavy projecting Baroque pediment supported on paired consoles, flanked by large, arched windows with voluted keystones and relief-carved griffins in the spandrels. The oxeye windows in the center of the Arch and Devonshire Street facades are surrounded by foliate carving, and framed by large allegorical figures carved by the noted New York sculptor Max Bachman (whose most notable work was the series of allegorical figures on the Pulitzer Building in New York.)

The five-story shaft or main section of the building is divided into three horizontal segments. A bottom story of arcaded, round-arched windows with deep reveals and molded extrados is clearly derived from the work of H. H. Richardson. The middle three-story segment is composed of three bays of multiple windows separated by foliate relief-carved spandrels, and framed within carved, molded surrounds. A top story of rectangular windows separated by paired colonettes has wider, panelled divisions which continue the lines of the bay separations below. The entire section is capped with a rinceau-carved frieze, and is framed in on the Arch and Devonshire facades by small, rectangular windows set into wide stone piers at the ends of each floor.

The bottom story of the two-story section repeats the arcaded floor of round-arched windows below, except that the intermediate pilasters are fluted and, again, wider separations continue the window bay divisions below. The added top story is composed of small, rectangular windows divided by paired consoles which mirror those in the entrance pediment. The window bay divisions are marked on this floor by high relief cartouches which, like much of the carved decoration, derive from the Beaux-Arts tradition. The light color, smooth finish, and tight mortar joints of the stone facing are also evocative of Beaux-Arts monumentality and classicism.

2.3 Photographs: attached
INTERNATIONAL TRUST CO. BUILDING
North and East Facades
BRA Photo by Pierce Pearmain, July '77
2.4 Typical Floor Plan

45 Milk Street  7TH FLOOR - SEMI-TYPICAL
3.0 SIGNIFICANCE

3.1 Historical Associations

The building's historical significance derives from its origin as the home office of a major New England trust company. As such, it reflects the growth of banking and finance in late 19th Century Boston, and the growth of the downtown business district, with consequent changes in land use.

The International Trust Company was founded in 1879, in the wake of Boston's rapid recovery from the Panic of 1873. Originally housed in a five-story building built shortly after the 1872 Fire, the firm's steady growth in the boom years of the 1880's and early 90's caused it to undertake the construction of a new home office on the same site, in 1893. By this time, the firm was among the four or five largest in New England, boasting combined assets of about 7 million dollars.

The firm's decision to build a major office building on Milk Street, three full blocks from the pre-fire financial center along State Street, was characteristic of the gradual southward movement of the Financial District in the last quarter of the 19th century. Milk Street had formerly marked the approximate northern boundary of the dry-goods district, which was now forced southward and westward toward the present-day Garment District.

Following the building's construction, the firm continued to grow, finding it necessary to enlarge its building by 1906. A series of mergers with smaller trust companies in the years following World War I placed it as New England's second largest trust company by 1923. In that year, a merger was announced with First National Bank (then, as now, New England's largest) in order "to provide the city with a banking institution comparable with the largest banks in the country". The consolidation, though it made First National the nation's fourth largest bank led to the extinction of the International Trust Company as an independent entity.
3.2 Architectural Significance

The International Trust Company building has significance in three areas:

1. As a major work of a prominent Boston architect.
2. As an early Boston example of Beaux-Arts office architecture.
3. As an early example of proto-skeleton frame construction.

1. The building's architect, William Gibbons Preston (1844-1910) studied for a short time at the Ecole des Beaux-Arts in Paris. At first in association with his well-known father Jonathan, and later on his own, Preston designed major Boston buildings in the French Academic, Romanesque, Queen Anne and Renaissance Revival manners, including the Museum of Natural History (now Bonwit Teller), the oldest portion of the Hotel Vendome, the First Corps of Cadets Armory, and the Chadwick Lead Works. He also designed numerous Back Bay residences, demonstrating his facile command of the eclectic architectural vocabulary of the late 19th Century.

In addition, Preston is responsible for numerous notable New England residents and vacation houses in Brookline, Marshfield, Falmouth, Narragansett Pier, Rhode Island, and Rye New Hampshire, as well as others in Ohio, New York, South Carolina, and New Mexico. He also designed several important public and commercial buildings in Savannah, Georgia, including the 1886 Cotton Exchange, the Chatham County Courthouse and the Hotel DeSoto (both in 1889), and the Guards Armory, in 1892.

The International Trust Company Building, designed in the latter part of his career, may be his earliest Beaux-Arts design and is certainly a major work of a prominent Boston architect.

2. As an early example of Beaux-Arts facade treatment on a commercial structure, the International Trust Company Building anticipates the popularity of that style, especially for large-scale or public buildings, following the World's Columbian Exposition in Chicago in 1893. Though it retains some elements of the previously popular Romanesque Style, the building possess a monumentality, a formality of facade organization, and an ornateness of detail which derive from the Beaux-Arts tradition and which mark it as an example of the 'mercantile classicism' which was soon to predominate in office architecture.

3. The new method of building construction based on the steel skeleton frame, developed by the so-called 'Chicago School' of architects in the 1880's and in wide use there by 1893, had an enormous impact on the scale and design of American commercial architecture. Nevertheless, these advances were slow to catch on in traditionally-minded Boston. Thus the construction of the International Trust Company Building, combining the use of traditional load-bearing masonry walls with 'modern' (and
still somewhat daring) reinforced concrete and steel framing, stands as an early Boston example of the use of these new methods and materials.

3.3. Relationship to the Criteria for Landmark Designation

The International Trust Company Building clearly meets the criteria for Landmark designation as established by Section 4 of Chapter 772 of the Acts of 1975 in that it is of distinguished architectural design, embodying distinctive characteristics of construction and style which make it inherently valuable for study, and as a notable work of an architect whose work influenced the development of the city.
4.0 **Economic Status**

4.1 **Current Ownership:**

The building is presently owned by Frank Sawyer under the title of Sixty-Five Bedford Street, Inc. The owner's application for a 57-space parking permit for the site was denied in early 1977.

4.2 **Assessed Value:**

The total assessed value of Parcel #4662, which includes the adjacent buildings numbered 4-36 Arch Street and 153-173 Devonshire, is $1,175,000.00, of which $760,000.00 is for the land and $414,000.00 for the buildings. At the current tax rate, annual taxes are $297,157.50. (45 Milk Street occupies slightly under half of the total site area of this assessor's parcel.)

During the last four years (1974-1977), the owner has received a tax abatement amounting to 45% of his tax bill; the 1973 abatement was 34%.

4.3 **Development Factors:**

a. **Condition** - Vacant since 1973, the building is open to the weather, due to broken or missing windows, skylights, and flashing, and has been stripped of much of its plumbing and hardware. Although there is increasing damage to upper floors and rusting of framing members as a result of this situation, the building is presently considered to be basically structurally sound. (See P. Folkins memorandum to Pauline Chase Harrell September 27, 1977).

b. **Area** - The building is constructed with load-bearing masonry exterior walls supporting an interior steel structural frame, and is built to the lot lines of its 7,200SF parcel. Each of its 9 floors is thus approximately 7,000SF, yielding a gross floor area of 63,000 SF.

c. **Assembly** - The availability of two adjacent parcels (at #159 and 161-173 Devonshire Street), which are under common ownership with 45 Milk, is regarded as a favorable influence for re-use development.

d. **121A Agreement** - The re-use of the building has recently been cited by Mayor White as a suitable project for eligibility for tax benefits under Chapter 121A, thus providing further development incentives.

e. **Market Factors** - The building is located in an area alleged to have a strong demand for prime office space. Its proximity to the Washington Street retail district and downtown location also make it suitable for mixed retail/residential development.
5.0 PLANNING CONTEXT

5.1 Relationship to Current Zoning

The International Trust Company Building is within a B-10 zone, permitting all standard commercial uses up to an allowable physical density (measured by the Floor Area Ratio, or FAR) of ten times the total site area. The present structure is near the ceiling of this FAR limit.

5.2 Current Planning Issues

Current planning philosophy for the Downtown Financial District is directed toward preservation and selective development; that is, toward promoting new economic and physical growth through conversion or redevelopment, designed in such a way as to be compatible with existing uses and structures. Specific planning objectives and planned activities for the area consist of the following:

1) Mixed-Use Development -- Development of the district as a 24-hour use area mixing residential, cultural, and other non-commercial activities with commercial uses is an objective for the area both to contribute to its vitality and to relieve pressure on the housing market in areas such as the North End and Chinatown.

The feasibility of creating new mixed-use space in currently under-utilized commercial buildings as well as in several potential development sites in the CBD is currently being explored. The BRA is currently involved in a study entitled, New Neighborhoods Downtown which is looking at the opportunity for converting Class C commercial space in older Downtown buildings to residential use.

2) Preservation -- Numerous precedents exist for the preservation of tax-exempt historic shrines in the downtown, such as the Old State House and the Old South Meeting House. However, beginning with the privately-financed restoration of the Old Corner Bookstore for office and retail use, increasing emphasis has been placed on generating revenue-producing adaptive re-uses for the CBD's significant historical and architectural assets. Recent examples of this include the Old City Hall and One Winthrop Square, which have been converted to Class A office use. Downtown buildings currently receiving such attention are 15 State Street, a Beaux-Arts office building being adapted for office and visitor center use by the National Park Service, and the old Shawmut Bank Building (designed by Shepley, Rutan, and Coolidge in 1921) which is being renovated into Class A office space. The BRA's New Neighborhoods Downtown study is a further reflection of the concern for saving older downtown buildings through tax-producing re-uses.
3) New Office Construction -- New office construction on appropriate sites and of appropriate scale, height, and setback is being encouraged. Incentive zoning and design review are two tools used to insure compatibility of new construction with existing buildings. The limited availability of sites as well as a surplus of downtown office space have generally restricted the development options to several sites such as the Old Federal Reserve Building, which offer potential for conversion or new construction.

4) Revitalization of the Retail District -- Public improvements and private investment are being undertaken to support and reinforce the downtown shopping area. These improvements are designed to increase the volume of pedestrian and retail activity, and to minimize the impact of vehicular traffic in the area.

The BRA's $12 million Downtown Public Improvement Program is designed to improve pedestrian and vehicular circulation systems in the area, through a network of street re-alignments and resurfacing, sidewalk widening and re-paving, new lighting and street furniture, landscaped pedestrian plazas, and MBTA station improvements, as well as the planned construction of additional off-street parking.

In addition, the proposed mixed-use, Jordan Marsh/Lafayette Place development will provide new retail space which will reinforce the pedestrian-related retail character of the area.

Pedestrian improvements most directly affecting 45 Milk Street will be the planned sidewalk improvements along Arch Street adjacent to the building, and a new pedestrian plaza in Post Office Square.
6.0 ALTERNATIVE APPROACHES

6.1 Alternatives

Both the significance of the structure and the language of the Commission's enabling statute, which precludes all but landmark designations in the central city, limit the designation category to that of Landmark.

The only alternative protection device would be inclusion on the National Register of Historic Places, which would, if successfully pursued, afford a limited degree of protection.

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

6.2 Impact of Alternatives

Inclusion on the National Register of Historic Places, though it does not prevent a private owner from demolishing a building with his or her own funds does provide tax incentives for re-use or existing historic structures. The Tax Reform Act of 1976 prohibits both the deduction of demolition costs from Federal Income Taxes, and the use of accelerated depreciation for a new structure built on the site of former National Register property.
7.0 RECOMMENDATIONS

The staff of the Boston Landmarks Commission recommend that the International Trust Company Building be designated a Landmark under Chapter 772 of the Acts of 1975, and that the property be nominated to the National Register of Historic Places.

The standards and criteria recommended for administering the regulatory functions provided for in Chapter 772 are attached.
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INTRODUCTORY STATEMENT ON STANDARDS AND CRITERIA

Boston Landmarks Commission

Per Sections 4, 5, 6, 7 and 8 of the enabling statute (Chapter 772 of the General Laws of the Commonwealth of Massachusetts for 1975), Standards and Criteria must be adopted for each Landmark Designation which shall be applied by the Commission in evaluating proposed changes to the property. Before a Certificate of Design Approval or Certificate of Exemption can be issued for such changes, the changes must be reviewed by the Commission with regard to their conformance to the purposes of the statute.

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

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

In general, the intent of the Standards and Criteria is to preserve existing qualities that cause designation of a property; however, in some cases they have been so structured as to encourage the removal of additions that have lessened the integrity of the property.
It is recognized that changes will be required in designated properties for a wide variety of reasons, all of which are not under the complete control of the Commission or the owners. Primary examples are:

a) Building code conformance and safety requirements.

b) Changes necessitated by the introduction of modern mechanical and electrical systems.

c) Changes due to proposed new uses of a property.

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

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

The Standards and Criteria have been divided into two levels: (1) those general ones that are common to almost all landmark designations (with three different categories for buildings, building interiors and landscape features); and (2) those specific ones that apply to each particular property that is designated. In every case the Specific Standards and Criteria for a particular property shall take precedence over the General ones if there is a conflict.
GENERAL STANDARDS AND CRITERIA FOR BUILDINGS AND STRUCTURES DESIGNATED AS LANDMARKS by the Boston Landmarks Commission

A. APPROACH

1. The design approach to the property should begin with the premise that the features of historical and architectural significance described within the Study Report must be preserved. In general this will minimize the exterior alterations that will be allowed.

2. Changes and additions to the property and its environment which have taken place in the course of time are evidence of the history of the property and the neighborhood. These changes to the property may have developed significance in their own right, and this significance should be recognized and respected. ("Later integral features" shall be the term used to convey this concept.)

3. Deteriorated material or architectural features, whenever possible, should be repaired rather than replaced or removed.

4. When replacement of architectural features is necessary it should be based on physical or documentary evidence of original or later integral features.

5. New materials should, whenever possible, match the material being replaced in physical properties, design, color, texture and other visual qualities. Imitation replacement materials are not allowed.

6. New additions or alterations should not disrupt the essential form and integrity of the property and should be compatible with the size, scale, color, material and character of the property and its environment.

7. New additions should be contemporary in design, not imitative of an earlier style or period.
8. New additions or alterations should be done in such a way that if they were to be removed in the future, the essential form and integrity of the historic property would be unimpaired.

9. Priority shall be given to those portions of the property which are visible from public ways or which it can be reasonably inferred may be in the future.

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

B. EXTERIOR WALLS

I. MASONRY

1. Whenever possible, original masonry and mortar should be retained.

2. Duplicate original mortar in composition, color, texture, joint size, joint profile and method of application.

3. Repair and replace deteriorated masonry with material which matches as closely as possible.

4. When necessary to clean masonry, use gentlest method possible. Do not sandblast. Doing so changes the visual quality of the material and accelerates deterioration. Test patches should always be carried out well in advance of cleaning (including exposure to all seasons if possible).

5. Avoid applying waterproofing or water repellant coating to masonry, unless required to solve a specific problem. Such coatings can accelerate deterioration.

6. In general, do not paint masonry surfaces. Painting masonry surfaces will be considered only when there is documentary evidence that this treatment was used at some point in the history of the property.
II  NON-MASONRY

1. Retain and repair original or later integral material whenever possible.

2. Retain and repair, when necessary, deteriorated material with material that matches.

C. ROOFS

1. Preserve the integrity of the original or later integral roof shape.

2. Retain original roof covering whenever possible.

3. Whenever possible, replace deteriorated roof covering with material which matches the old in composition, size, shape, color, texture, and installation detail.

4. Preserve architectural features which give the roof its character, such as cornices, gutters, iron filigree, cupolas, dormers, brackets.

D. WINDOWS AND DOORS

1. Retain original and later integral door and window openings where they exist. Do not enlarge or reduce door and window openings for the purpose of fitting stock window sash or doors, or air conditioners.

2. Whenever possible, repair and retain original or later integral window elements such as sash, lintels, sills, architraves, glass, shutters and other decorations and hardware. When replacement of materials or elements is necessary, it should be based on physical or documentary evidence.

3. On some properties consideration will be given to changing from the original window details to other expressions such as to a minimal anonymous treatment by the use of a single light, when consideration of cost, energy conservation or appropriateness override the desire for historical accuracy. In such cases, consideration must be given to the resulting effect on the interior as well as the exterior of the building.
E. PORCHES, STEPS AND EXTERIOR ARCHITECTURAL ELEMENTS

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

F. SIGNS, MARQUEES AND AWNINGS

1. Signs, marquees and awnings integral to the building ornamentation or architectural detailing shall be retained and repaired where necessary.

2. New signs, marquees and awnings shall not detract from the essential form of the building nor obscure its architectural features.

3. New signs, marquees and awnings shall be of a size and material compatible with the building and its current use.

4. Signs, marquees and awnings applied to the building shall be applied in such a way that they could be removed without damaging the building.

5. All signs added to the building shall be part of one system of design, or reflect a design concept appropriate to the communication intent.

6. Lettering forms or typeface will be evaluated for the specific use intended, but generally shall either be contemporary or relate to the period of the building or its later integral features.

7. Lighting of signs will be evaluated for the specific use intended, but generally illumination of a sign shall not dominate illumination of the building.

8. The foregoing not withstanding, signs are viewed as the most appropriate vehicle for imaginative and creative expression, especially in structures being reused for purposes different from the original, and it is not the Commission's intent to stifle a creative approach to signage.
G  PENTHOUSES

1. 'The objective of preserving the integrity of the original or later integral roof shape shall provide the basic criteria in judging whether a penthouse can be added to a roof. Height of a building, prominence of roof form, and visibility shall govern whether a penthouse shall be approved.

2. Minimizing or eliminating the visual impact of the penthouse is the general objective and the following guidelines shall be followed:

   a) Location shall be selected where the penthouse is not visible from the street or adjacent buildings; setbacks shall be utilized.

   b) Overall height or other dimensions shall be kept to a point where the penthouse is not seen from the street or adjacent buildings.

   c) Exterior treatment shall relate to the materials, color and texture of the building or to other materials integral to the period and character of the building, typically used for appendages.

   d) Openings in a penthouse shall relate to the building in proportion, type and size of opening, wherever visually apparent.

H  LANDSCAPE FEATURES

1. The general intent is to preserve the existing or later integral landscape features that enhance the landmark property.

2. It is recognized that often the environment surrounding the property has a character, scale and street pattern quite different from that existing when the building was constructed. Thus, changes must frequently be made to accommodate the new condition, and the landscape treatment can be seen as a transition feature between the landmark and its newer surroundings.
3. The existing landforms of the site shall not be altered unless shown to be necessary for maintenance of the landmark or site. Additional landforms will only be considered if they will not obscure the exterior of the landmark.

4. Original layout and materials of the walks, steps, and paved areas should be maintained. Consideration will be given to alterations if it can be shown that better site circulation is necessary and that the alterations will improve this without altering the integrity of the landmark.

5. Existing healthy plant materials should be maintained as long as possible. New plant materials should be added on a schedule that will assure a continuity in the original landscape design and its later adaptations.

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

I. EXTERIOR LIGHTING

1. There are two aspects of exterior lighting:
   a) Lighting fixtures as appurtenances to the building or elements of architectural ornamentation.
   b) Quality of illumination on building exterior.

2. Wherever integral to the building, original lighting fixtures shall be retained. Supplementary illumination may be added where appropriate to the current use of the building.

3. New lighting shall conform to any of the following approaches, as appropriate to the building and to the current or projected use:
   a) Accurate representation of the original period, based on physical or documentary evidence.
   b) Retention or restoration of fixtures which date from an interim installation and which are considered to be appropriate to the building and use.
c) New lighting fixtures which are contemporary in design, and which illuminate the exterior of the building in a way which renders it visible at night and compatible with its environment.

4. If a fixture is to be replaced, the new exterior lighting shall be located where intended in the original design. If supplementary lighting is added, the new location shall fulfill the functional intent of the current use without obscuring the building form or architectural detailing.

J. REMOVAL OF LATER ADDITIONS AND ALTERATIONS

1. Each property will be separately studied to determine if later additions and alterations can, or should, be removed. It is not possible to provide one general guideline.

2. Factors that will be considered include:

a) Compatibility with the original property's integrity in scale, materials and character.

b) Historic association with the property.

c) Quality in the design and execution of the addition.

d) Functional usefulness.
SPECIFIC STANDARDS AND CRITERIA

INTERNATIONAL TRUST BUILDING

45 Milk Street

A. General

1. The intent is to preserve the overall character of the building; its mass in the definition of city block, street, and sidewalk; and its richness of detail.

2. Since the building is currently unoccupied, the Commission encourages exploration of uses, particularly a mixed use solution, that will contribute to the vitalization of the downtown in this prime location between the downtown shopping district and financial district.

3. Although the designation applies to the exterior of the building, the Commission encourages a use that will utilize the richness of materials and details that exist in the interior, and the retention of the existing light court.

4. The elevations along Milk, Devonshire and Arch Streets shall be subject to all the guidelines for the building exterior.

5. The structure shall be maintained so as to prevent damage from unnecessary exposure to the elements or unreasonable deterioration therefrom.

B. Walls

1. No new openings shall be allowed in the walls fronting on Milk, Devonshire and Arch Streets, nor existing openings removed or changed in size.

2. All detail, ornamentation and statuary shall be preserved.

3. Masonry should not be painted, cleaning of the facade shall not be done in a manner which, in the judgment of the Commission, may be destructive to the stone.

C. Windows

1. Existing window openings shall be retained. Existing sash may be replaced where required, but where replaced shall be consistent for all windows of one size or level. Single lights shall be permitted as an alternate to double-hung, but in no case shall any additional mullions be included in replacements.

2. Window frames shall be of a color similar to or darker than masonry walls. Cast iron trim around window openings at ground level shall be retained and painted consistent with the color of window frames.
3. Windows may be converted to louvers if required for air handling system, but only at openings on ninth floor.

4. Consideration should be given to removing the entrance and canopy with street number and name which is not original to the building.

D. Penthouses

1. New penthouses should not be visible from the streets adjacent to the building.

E. Ornamentation

1. All original ornamentation, such as stone carving and statuary shall be preserved. New signage and lighting shall not obscure original ornamentation.

2. If metal grills at basement windows are required, then existing grills shall be retained.
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1. No new openings shall be allowed in the walls fronting on Milk, Devonshire and Arch Streets, nor existing openings removed or changed in size.

2. All detail, ornamentation and statuary shall be preserved.

3. Masonry should not be painted, cleaning of the facade shall not be done in a manner which, in the judgment of the Commission, may be destructive to the stone.

C. Windows

1. Existing window openings shall be retained. Existing sash may be replaced where required, but where replaced shall be consistent for all windows of one size or level. Single lights shall be permitted as an alternate to double-hung, but in no case shall any additional mullions be included in replacements.

2. Window frames shall be of a color similar to or darker than masonry walls. Cast iron trim around window openings at ground level shall be retained and painted consistent with the color of window frames.
3. Windows may be converted to louvers if required for air handling system, but only at openings on ninth floor.

4. Consideration should be given to removing the entrance and canopy with street number and name which is not original to the building.

D. Penthouses

1. New penthouses should not be visible from the streets adjacent to the building.

E. Ornamentation

1. All original ornamentation, such as stone carving and statuary shall be preserved. New signage and lighting shall not obscure original ornamentation.

2. If metal grills at basement windows are required, then existing grills shall be retained.