



HISTORIC  
SALEM INC

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📍 Preservation at work

December 11, 2018

Salem City Council and  
Planning Board  
93 Washington Street  
Salem, MA 01970

Dear City Council and Planning Board Members,

Historic Salem, Inc., is supportive of tools that encourage the successful reuse of large historic buildings. We have a long record of supporting historic reuse through well planned and appropriate permitting, for example, through our support of the conversions to housing of the Salem Jail and the Salem Police station. Even now, many Salem neighborhoods feature former school buildings successfully preserved through conversion to housing.

We support the proposed Adaptive Reuse Overlay ordinance sections that apply to the reuse of older buildings and of the goal to “minimize impacts to surrounding neighborhoods”. We find that the sections of the ordinance that permit substantial new construction have potential for negative impacts on unique historic neighborhoods and recommend that new construction, whether free standing or additions, simply comply with the underlying zoning of each site. This would be consistent with the language in a model adaptive reuse ordinance published by the National Trust for Historic Preservation.

The ordinance allows new construction heights of 50 feet; and for an addition to a building, the height can be as high as the attached building (not including certain features). In most cases, these churches and schools are already the tallest and largest buildings in their neighborhood. This height allowance, combined with a proposed density that is fifteen times that of the allowed density in R-2 zoning and the minimal setbacks, creates the potential to introduce new buildings overwhelmingly out of scale with surrounding historic neighborhoods, most of which are currently zoned R-1 or R-2. This type of development could have highly detrimental impacts on historic residential neighborhoods that would be allowed by-right, leaving neighbors little ability to affect permitting.

In return for this very permissive zoning we do not find that a simple request for comments from the Historic Commission and/or Design Review Board sufficiently offsets the potential negative impacts. There is no requirement to adhere to those comments nor does the Overlay language clearly delineate what standards those boards should apply.

HSI asks the Councilors and Planning Board members to review the ordinance language for clarity so that implementation of the zoning is not left open to variable interpretation.

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We have attached a Memorandum of Technical Comments that identifies sections of the ordinance that could be confusing. We note, however, that if new construction were to comply with existing zoning many of these clarifications would be unnecessary.

The draft of the Overlay District is highly permissive of new large-scale construction. It introduces a zoning very similar to the downtown business district (B5) into small-scale residential neighborhoods without the associated constraints found in virtually all other B5 zones as outlined in the Salem Downtown Renewal Plan.

We also ask the Planning Board and City Council to consider whether this Overlay should be applied to parcels on a case-by-case basis as determined by the City Council rather than by applying new zoning to nearly thirty properties across the city as a matter of right. We believe it is a valid concern that this proposed zoning might unnecessarily accelerate the abandonment of a current use for a new one.

We have provided these comments to the Planning Department staff and remain committed to work to craft an ordinance that can achieve broad support within the preservation community. We look forward to the continued community conversation about this ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Jenkins". The signature is fluid and cursive, with a large initial "T" and "J".

Tim Jenkins, President

Cc: Mayor Driscoll  
City Planner