October 2, 2013

Ms. Trudy Coxe, Executive Director
The Preservation Society of Newport County
424 Bellevue Avenue
Newport, RI 02840

Re: The Breakers Welcome Center

Dear Ms. Coxe:

On July 10, 2013 the Rhode Island Historical Preservation Commission (RIHPHC) approved the proposal of the Preservation Society of Newport County (PSNC) to construct a Welcome Center on the grounds of The Breakers. The approval is subject to ongoing technical review by RIHPHC staff. This letter summarizes RIHPHC’s findings and conclusions in reviewing the Welcome Center project; however, the definitive record of RIHPHC’s review and approval is the Minutes of RIHPHC meetings held on June 12, 2013 and July 10, 2013 (approved at RIHPHC’s September 11 meeting).

Background

The Welcome Center structure would consist of four connected 1-story components: a southern ticketing pavilion, a central vestibule pavilion, a northern refectory pavilion, and a western restroom wing. The three pavilions feature steel-framed glass walls and copper-shingled pavilion roofs with glass skylights. The restroom wing is a flat-roofed structure with cement panel siding. The plan also includes stone paved paths and a patio area.

RIHPHC review and approval of the Welcome Center project is required by the terms of a historic preservation easement signed in 2003. The easement generally provides for review of exterior alterations to the historic property. In relation to the Welcome Center project, the easement grants RIHPHC the right to review and approve:

- construction of additional buildings on the premises;
- changes to the landscape features and improvements;
- alteration of the topography and removal or cutting down of specimen trees; and
- materials, methods, and cleaning substances and colors to be used in any such work.

RIHPHC’s review considered information that was provided by the PSNC and its consultants, the National Historic Landmark nomination, the Historic Designed Landscape Assessment prepared by Patricia O’Donnell, observations during several site
visits, the comments of the Bellevue-Ochre Point Neighborhood Association and numerous public comments.

The Building Site

The proposed Welcome Center would be located on a portion of the northwest quadrant of the property north and east of the historic Gate House/Caretaker’s Cottage and adjacent to a section of the Garden Path. This location is a significant distance away from The Breakers mansion in an area that has traditionally been characterized by dense landscape plantings and has little visibility from The Breakers mansion. The area has historically been thickly planted with trees and shrubs that screen views from all directions. In particular, the view toward the Welcome Center site from The Breakers porte cochere is filled by specimen trees and other vegetation. The Welcome Center site will remain screened from view from The Breakers mansion by the existing and planned additional vegetation.

Architectural Design

The architectural design of the proposed new pavilions is a contemporary reference to park pavilions and greenhouses of the late 19th century. The building’s largely transparent walls, curved forms and complex massing are compatible with the historical character of The Breakers and its landscape setting without creating a false sense of historic development. It is important that the Welcome Center design should be differentiated from the original historic components of The Breakers estate. RIHPHC approves of the use of appropriate materials and design that differ from the heavy masonry and neo-classical detail of the historic mansion and the Gate House/Caretakers Cottage and the fanciful Children’s Play House while harmonizing with the proposed site within a heavily planted landscape.

The Gate House/Caretaker’s Cottage

The Welcome Center location is immediately adjacent to the Gate House/Caretaker’s Cottage, but a physical and visual separation has been established to insure the physical fabric and historic character of the Cottage are maintained intact. Given this close proximity, the use of appropriate materials and design that differ from the heavy masonry and neo-classical detail of the historic Gate House/Caretakers Cottage is particularly desirable to differentiate between historic and new construction. RIHPHC review gave close attention to the siting and scale of the Welcome Center pavilions and their landscaping in relation to the Gate House. This issue was reviewed on site with the construction footprint marked with stakes in the ground and construction tape. Existing dense historic landscaping that will be preserved together with additional landscaping will effectively screen the southern face of the pavilion. As a result of RIHPHC review, the southern pavilion of the Welcome Center has been shifted and rotated several additional feet back from the Gate House in order to further protect the existing plant material and to protect the primary view of the Gate House.
RIHPHC accepts that there is a functional need to separate the public Welcome Center from staff operations functions in the Gate House/Caretaker’s Cottage. RIHPHC approves of the revised design for an open metal lattice covered in ivy to address this issue. Additional information about historic rehabilitation work to the Gate House/Caretaker’s Cottage and its landscape treatment will be provided for RIHPHC review in the future.

Underground Boiler House

The Welcome Center project site includes a portion of the underground Boiler House. The underground boiler house is a historic feature, and RIHPHC supports PSNC plans for its repair and preservation. The existing rhododendrons and other shrubs on top of the Boiler House may be transplanted to allow repair work on the Boiler House roof and then replanted. Two copper beech trees with root systems that cannot be avoided by the Boiler House repair work will be removed. PSNC will provide detailed plans for RIHPHC review at a future time. PSNC’s engineer has reviewed plans for the Welcome Center construction and found it will not affect the structural stability of the Boiler House.

Historic Landscape

The landscape setting contributes to the historic character of The Breakers. The historic landscape design of the western half of the Breakers estate of 1895-6 created an outer perimeter border of trees and evergreen shrubs to screen the property from the street, loosely paralleled by a serpentine Garden Path that had sections planted on one or both sides by a tiered succession of inner herbaceous border and two rows of outer mid-height evergreen shrubs. The inner grounds bounded by the entry drives and the Garden Path was designed as a bosque, i.e. lawn planted with specimen trees. This plan incorporated some existing trees and shrubs from the previous landscaping effort with new materials, including numerous sapling trees. In the decades following the 1896 planting, the trees matured as anticipated; their canopy spread, and filtered sunlight replaced the direct sunlight that characterized much of the 1896 landscape and would have affected the viability of lower-level plantings. The design of the western half of the property differed significantly from the eastern half which featured the imposing Breakers mansion at the center with its formal parterres, facing an open lawn out to Easton’s Bay.

The historic landscape received a serious blow from the 1938 hurricane which destroyed or severely damaged approximately 100 trees on the property. This was followed by an extended period of little or no landscape maintenance through the mid-20th century, during which time age and weather claimed more trees, shrubs became overgrown, and volunteer plants established themselves. The Preservation Society of Newport County initiated landscape restoration efforts in the 1990s, notably with the reintroduction of the allee of pin oaks along the western driveway.
Although the landscape in the northwest quadrant presently retains some elements of the historic landscape design of 1895-6, the overall integrity of the historic landscape in this quadrant of the property is poor. A number of specimen trees have survived, and they shade much of the area. The character of the Garden Path has evolved from the original layout of 1896 as growing conditions changed and the plantings matured: evergreen shrubs are now overgrown beyond the intermediate heights shown in the early photographs, and the herbaceous planting beds bordered by clipped hedges have long since disappeared. Due to these changed conditions, a return to the original 1896 design for a largely open setting would not be possible without removing many specimen trees.

In response to RIHPHC’s review, revised landscape plans for the project provide additional screening of the northern and southern pavilions, replacement/addition of specimen trees, and additional screening at the north lawn. The design along the Garden Path will provide more spatial definition and will recall the tiered hierarchy of the Path’s former landscape borders. These measures will protect the historic setting and landscape context of the property. In addition, PSNC has committed to preparation of a cultural landscape report for the property, and RIHPHC and PSNC will jointly develop a reasonable scope of work for landscape archaeology to evaluate a portion of the affected Garden Path in order to document its historic treatment.

Other proposed landscape work not directly associated with the Welcome Center will be reviewed by RIHPHC as plans are developed, including details to preserve the existing granite curbs at the western entrance drive where the Garden Path intersects and plans for disassembly and reconstruction of a section of the perimeter wall and fence at Sheppard Avenue to match its existing historic appearance.

Analysis of Preservation Standards

In exercising its review under the easement, RIHPHC applied the Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, issued by the Secretary of the United States Department of the Interior. The following Standards are most relevant together with the National Park Service guidelines for new construction within the boundaries of historic properties (enclosed):

Standard 1. “A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.”

In accordance with the Secretary of the Interior’s Standards #1, RIHPHC has concluded that the Welcome Center project requires minimal change to the defining characteristics of the historic buildings and site. The new building will be effectively screened from view from The Breakers mansion, and its design is compatible with but differentiated from the historic architecture on the site.
Standard 2. “The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.”

In accordance with the Secretary of the Interior’s Standards #2, RIHPHC has concluded that the Welcome Center project will not remove historic materials or significantly alter character-defining historic features. We find that the historic landscape features in the project area lack integrity and the project plans include rehabilitation of the landscape and Garden Path.

Standard 9. “New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.”

In accordance with the Secretary of the Interior’s Standards #9, RIHPHC has concluded that the Welcome Center project will not destroy the historic materials that characterize The Breakers property, and that the new work will be compatible but differentiated from the old and will not destroy the historic integrity of the property.

Standard 10. “New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”

In accordance with the Secretary of the Interior’s Standards #10, RIHPHC has concluded that the Welcome Center project is well separated from the historic buildings, and if removed in the future would leave the historic property unimpaired.

The National Park Service guidelines for new construction within the boundaries of historic properties are instructive in reviewing the Welcome Center project.

1. The project will not alter the historic character of The Breakers as an extraordinary 1890s mansion surrounded by broad lawns, specimen trees, and great lawn open to the Atlantic Ocean.

2. The project design places the new construction behind a dense screen of historic landscaping and is located a considerable distance away from the mansion. The relationship between the new construction and the historic Gate House/Caretakers Cottage has been protected by a screen of landscape planting and compatible architectural design that differentiates between old and new buildings.

3. The project has gone to great lengths to protect the historic setting and context of The Breakers through landscape design and architectural design.

4. The project does not affect the historic relationship between the Gate House at the edge of the property and the mansion at the center of the property.
5. The architectural design of the Welcome Center is evocative of park pavilions and greenhouses of the late 19th century and is compatible with the historical character of The Breakers and its landscape setting without creating a false sense of historic development. The new construction will not be highly visible because it will be screened by existing and new landscape planting.

6. The project is located a significant distance away from the historic mansion, and therefore the issues of size, scale, and design of the new construction are diminished.

7. The project has maximized the advantage of existing site conditions that include extensive landscape screening in order the limit the project’s visibility.

8. The Breakers’ historic landscape has been extensively documented and evaluated. All reviewers have noted that the project is located in an area where the historic landscape features have poor integrity and that it is an area that historically was screened from view. Significant viewsheds of the property will remain unaffected. The project includes measures to respect and rehabilitate the historic landscape character of the Welcome Center site, and in addition, PSNC is engaged in the preparation of a cultural landscape report as a step toward future historic landscape restoration projects.

For these reasons, the Rhode Island Historical Preservation Commission (RIHPHC) has approved the proposal of the Preservation Society of Newport County (PSNC) to construct a Welcome Center on the grounds of The Breakers. The approval is subject to ongoing technical review by RIHPHC staff.

Yours very truly,

Edward F. Sanderson, Executive Director
State Historic Preservation Officer

Enclosures: Secretary of the Interior’s Standards for Historic Rehabilitation

National Park Service Guidelines for New Construction within the Boundaries of Historic Properties
The Secretary of the Interior's Standards for Rehabilitation

The Secretary of the Interior's Standards for Rehabilitation (36 CFR Part 67) are ten basic principles created to help preserve the distinctive character of a historic building and its site, while allowing for reasonable change to meet new needs.

The Standards apply to historic buildings of all periods, styles, types, materials, and sizes. They apply to both the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment as well as attached, adjacent, or related new construction.

Rehabilitation projects must meet the following Standards, as interpreted by the National Park Service, to qualify for State Preservation Grants.

The Standards are applied to projects in a reasonable manner, taking into consideration economic and technical feasibility.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.
Planning Successful Rehabilitation Projects

New Construction

New Construction within the Boundaries of Historic Properties

It is possible to add new construction within the boundaries of historic properties if site conditions allow and if the design, density, and placement of the new construction respect the overall character of the site. According to the Secretary of the Interior's Standards for Rehabilitation – Standard 9 in particular – and the Guidelines for Rehabilitating Historic Buildings, new construction needs to be built in a manner that protects the integrity of the historic building(s) and the property’s setting.

In addition, the following must be considered:

- Related new construction – including buildings, driveways, parking lots, landscape improvements and other new features – must not alter the historic character of a property. A property’s historic function must be evident even if there is a change of use.

- The location of new construction should be considered carefully in order to follow the setbacks of historic buildings and to avoid blocking their primary elevations. New construction should be placed away from or at the side or rear of historic buildings and must avoid obscuring, damaging, or destroying character-defining features of these buildings or the site.

- Protecting the historic setting and context of a property, including the degree of open space and building density, must always be considered when planning new construction on an historic site. This entails identifying the formal or informal arrangements of buildings on the site, and whether they have a distinctive urban, suburban, or rural character. For example, a historic building traditionally surrounded by open space must not be crowded with dense development.

- In properties with multiple historic buildings, the historic relationship between buildings must also be protected. Contributing buildings must not be isolated from one another by the insertion of new construction.

- As with new additions, the massing, size, scale, and architectural features of new construction on the site of a historic building must be compatible with those of the historic building. When visible and in close proximity to historic buildings, the new construction must be subordinate to these buildings. New construction should also be distinct from the old and must not attempt to replicate historic buildings elsewhere on site and to avoid creating a false sense of historic development.

- The limitations on the size, scale, and design of new construction may be less critical the farther it is located from historic buildings.

- As with additions, maximizing the advantage of existing site conditions, such as wooded areas or drops in grade, that limit visibility is highly recommended.

- Historic landscapes and significant viewsheds must be preserved. Also, significant archeological resources should be taken into account when evaluating the placement of new construction, and, as appropriate, mitigation measures should be implemented if the archeological resources will be disturbed.