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March 31, 2020

Capital Programs Department
Attn: Dara Callender
One Penn Plaza East, 8th Floor
Newark, NJ 07105

Re: Lackawanna Records Building

Dear Ms. Callendar,

Preservation New Jersey (PNJ), a statewide non-profit historic preservation education and advocacy organization, respectfully submits comments regarding the proposed demolition application of Lackawanna Records Building in Hoboken.

The Records Building was built in 1904 and is the earliest extant structure within the Hoboken Terminal Complex. New Jersey Transit has identified both this building's significance and deteriorated condition since at least 1997. In various reports and assessments NJ Transit has identified the need to stabilize and rehabilitate the Records Building but has not done so. This is not a new condition or awareness, but rather a clear example of neglect.

PNJ presumptively concedes the NJ State Historic Preservation Office (NJHPO) stance that the Records Building is potentially individually eligible on the New Jersey and National Registers of Historic Places and is definitively a contributing resource to multiple designated historic districts. PNJ further concurs with NJHPO that potential demolition of the Records Building would be in direct conflict with the existing 2001 Programmatic Agreement among the Federal Transit Administration, the New Jersey State Historic Preservation Officer, and New Jersey Transit Regarding the Implementation of the Hoboken Terminal and Yard Master Plan.

The most recent assessment and recommendations for demolition were conducted by consultants who do not meet the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, and consequently these analyses should not be used in making a determination on future or immediate action. The issue with use of an unqualified professional can be seen throughout the report, all of which have already been outlined in a letter dated March 23, 2020 by Donald Friedman, P.E., (a historic preservation specialist). In general, we defer to said letter. In summary, 1) many of the presumed structural defects are not documented in sufficient detail to allow for a proper third-party opinion, 2) the report claims that much of the damage is beyond repair, whereas typical restoration work (e.g. pointing and bracing) would be sufficient, and 3) there are instances where a misinterpretation of the building's original engineering (e.g. related to expansion joints) resulted, again, in a determination that structure could not be restored. We recommend that the structural analysis be redone by a qualified professional in accordance with Secretary of the Interior Standards.

PNJ further finds that, from a planning perspective, some of the site constraints listed in the report are not extraordinary in nature. Rather, they are typical to urbanized communities adjacent to a tidal waterway. To claim contextual constraints are insurmountable for one particular building is disingenuous at best. There are innumerable examples of similar size/shape structures, many within proximity to critical infrastructure, that have been

PRESERVATION NEW JERSEY

successfully adaptively reused. Moreover, we are unsure as to why potential future storm surge is an insurmountable constraint for this particular building, while the Central Railroad Terminal in Jersey City was restored with measures to mitigate surge and efforts to restore the Lackawanna Terminal continue. Why is the Records Building considered less resilient? It has survived past flooding and can continue to do so with proper restoration and maintenance.

PNJ is further perplexed why stabilization has not occurred to date. We understand that certain stabilization measures could possibly have an adverse impact on the historic integrity of the structure; however, given the health and safety impacts, it appears to be prudent to pursue a minimal level of stabilization. In a rehabilitation alternative, said stabilization is presumptive, and would cause a level of adverse impact anyway. Moreover, any adverse impact from stabilization would not be worse than the adverse impacts of relocation/reconstruction (Alternative 5) or demolition (Alternative 6).

These facts indicate either an intent plan or organizational misfeasance at demolition by neglect. This case is the very definition of the term – the practice of allowing a building to deteriorate to the point that demolition becomes necessary or rehabilitation becomes cost prohibitive. This attempt, whether intentional or not, of sidestepping law regarding the proper stewardship of our collective historic resources is unacceptable and should not be tolerated. As a statewide entity with numerous significant historic resources under its ownership, NJ Transit should have an organizational affirmative maintenance provision it operates under.

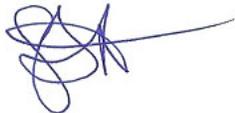
Preservation New Jersey strongly urges NJ Transit to pursue a stabilization/rehabilitation alternative, which will have the least adverse impact on the historic integrity of the structure. In light of the significant redevelopment plans for the area, it is likely that a private entity will find it financially feasible to pursue an adaptive reuse at some time in the future. We further urge NJ Transit to reevaluate its cost estimates in light of Mr. Friedman’s findings.

Thank you for the opportunity to comment on this matter. We hope you will pursue this matter in a manner that properly recognizes the value of NJ’s historic resources, and weighs the financial “savings” of past neglect with the potential current cost to do the right thing now.

Sincerely,



Matthew Pisarski, PP, AICP
Vice President



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