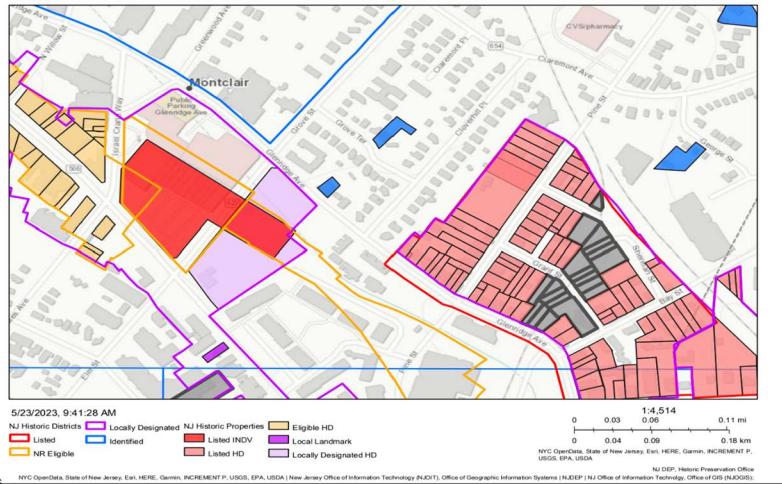


205 Claremont Avenue, Montclair, NJ 07042
Telephone: 973 509-4955 Fax: 973 509-4943

TO: Montclair Township Mayor and Council
FROM: Montclair Historic Preservation Commission
DATE: October 6, 2023
**RE: Comments of the Montclair Historic Preservation Commission to Revised
*Lackawanna Plaza Redevelopment Plan***

The Historic Preservation Commission of Montclair recognizes the historic significance of the Lackawanna Plaza as being an important architectural and engineering resource reflective of the expansion of the American railroad system at the turn of the 20th century. The significance of the site is viewed in its entirety including the station, the adjoining train platforms, the train sheds, and the various entrance points for both pedestrians and the trains, as an important cultural resource. Mr. Jack Chance, former township historian, in a letter dated 1981, in the collection of the Montclair History Center, highlighted the architectural significance of the site, the architectural genius of the architect, William Hull Botsford, and the importance of the site as a transportation center in the history of the township of Montclair.

The Planning Board of the Township of Montclair adopted an *Historic Preservation Element of the Master Plan* which identified the Lackawanna Plaza Redevelopment Area as being within the *Town Center Historic District and Historic District Expansions* (2002, 2003, and 2004) and includes structure(s) listed in the *New Jersey Register of Historic Places* (August 7, 1972), the *New Jersey Office of Historic Preservation Historic Sites Inventory of 1980*, the *National Register of Historic Places Inventory* (January 8, 1973), and designated as a "key" building within the *Town Center Historic District* (May, 2003); and is deemed a "key" resource in the *Thematic listing of Operating Passenger Railroad Stations* (October 14, 1977) and is identified in the *NJ CRGIS online viewer* of the NJ DEP, Historic Preservation Office. In totality, these listings indicate that the Lackawanna Plaza Train Station, with accompanying structures is the most significant historic site in the Township of Montclair.



<https://njdep.maps.arcgis.com/>
Lackawanna Plaza. Montclair. NJ DEP, Historic Preservation Office.

On January 27, 2023, the Historic Preservation Commission reviewed the October 2022 *Lackawanna Plaza Redevelopment Plan* prepared by Phillips Preiss Grygiel Leheny Hughes, LLC and Smith & Maran Architects. The HPC memorialized the revised resolution which reads: "... in order to bring the Lackawanna Plaza Redevelopment Plan (dated December 2022) into conformance with the *Historic Preservation Element of the Master Plan*, the entire project be scaled down in order to conform to the historic character of the Town Center Historic District".

The revised resolution of the Historic Preservation Commission (January 27, 2023) states:

WHEREAS, the Commission finds that the Plan - which permits the demolition and/or disturbance of all existing historically designated structures, aside from the Terminal Waiting Room - is inconsistent with the established polices for preservation of all of the existing historic structures native to the Lackawanna Plaza Redevelopment Area, as set forth in the *Historic Preservation Element of the Master Plan*, Section 347-126, et seq., of the Township Code, and the *2004 Nomination Report* which includes the entirety of the Lackawanna Plaza Redevelopment Area within the Town Center Historic District; and

WHEREAS, the Commission finds that the current Plan does not connect to the surrounding neighborhood in a significant manner and does not integrate with the eclectic styles of the *Town Center Historic District* as described in 347-127, which advocates that "new construction within or near historic districts ensure compatibility with the existing built environment and the Master Plan of Montclair; and

WHEREAS, the Commission finds that the buildings, masses (height, width, and depth) are out of scale and disproportionate to the historic scale of the immediately surrounding neighborhood and that the massive buildings will dominate and minimize the historic significance of the train station and the historic Redevelopment Area.

On August 15, 2023, the Township of Montclair introduced the *Revised Lackawanna Plaza Redevelopment Plan*, prepared by Phillips Preiss Grygiel Leheny Hughes, LLC, and Smith & Maran Architects.

On September 15, 2023, Montclair Planner Janice Talley, P.P., AICP, composed a memorandum addressing the comments of the Historic Preservation Commission in their resolution dated January 27, 2023, and the way these concerns were addressed in the *Revised Lackawanna Plaza Redevelopment Plan*.

On September 29, 2023, The Historic Preservation Commission convened a special meeting as per *Township of Montclair Historic Preservation Commission: Official Rules of Procedure/By Laws Article IV.*, Sections 3, 4 and 5. Five members of the HPC were present, including Thomas Connolly, HPC Historic Preservation Consultant; Janine Bauer, HPC attorney; and Janice Talley, acting assistant secretary.

Under discussion was the *Revised Lackawanna Plaza Redevelopment Plan* introduced on August 15, 2023, and comments offered by Janice Talley, addressing the concerns of the Historic Preservation Commission relating to the *Lackawanna Plaza Redevelopment Plan* and whether these changes adequately reflect the goals of historic preservation objectives within the *Revised Lackawanna Plaza Redevelopment Plan*.

The special meeting and subsequent discussion were consistent with N.J.S.A. 40:55D-110, as stated on page 106 in the *Revised Lackawanna Redevelopment Plan* and in accordance with Montclair Ordinance 347-134, which states under the heading of the Powers and duties of the Commission:

- F. To make recommendations to the Planning Board and the Township Council on the historic preservation implications of any proposed or adopted zoning or development ordinance or proposed or adopted elements of the Township's Master Plan
- G. To advise and assist Township officers, employees, boards, and other bodies, including those at the county, state, and federal levels, on all matters which have potential impact on the historic buildings, structures, objects, sites, or districts in the Township or on the physical character and ambience of any portion of the Township or region.

The Historic Preservation Commission's discussion centered on the relevant changes updated in the *Revised Lackawanna Redevelopment Plan*, as outlined in the memorandum dated September 15, 2023 and whether these changes were consistent with the goals of the *Historic Preservation Element of the Township Master Plan: Montclair* and the inherent purposes of the Historic Preservation Ordinance, Section 347-134, which are as follows:

- Safeguard the heritage of Montclair by preserving resources within the Township which reflect elements of its cultural, social, economic, and architectural history.
- Encourage the continued use of historic and/or noteworthy buildings, structures, objects, and sites and to facilitate their

- appropriate reuse.
- Maintain and develop an appropriate and harmonious setting for the historic and architecturally significant buildings, structures, sites, and district with the Township.
 - Stabilize and improve property values within the Township.
 - Foster civic pride in the history and architecture of the Township.
 - Encourage proper maintenance of and reinvestment in buildings and structures within the Township.
 - Regulate appropriate alteration of historic sites as well as new construction within or near historic districts to ensure compatibility with the existing built environment and the Master Plan of Montclair.

In addition, The *Revised Lackawanna Redevelopment Plan* states on page 42 that “management of historic elements and all such work shall be performed in accordance with the *Rehabilitation Guidelines of the US Secretary of the Interior Standards for the Treatment of Historic Properties*”. Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” This is consistent with N.J.S.A. 40:55D-110 and Section 347-142 of the Township code.

The Planning Department’s memorandum dated September 15, 2023, included twelve points concerning the historic preservation concerns reflected in the *Revised Lackawanna Plaza Redevelopment Plan*. These discussion points and the Historic Preservation Commission’s consensus and responses are as follows:

1. I.I.B. INTRODUCTION – Plan Overview

Elimination of the word “viewshed” from the recommended sentence: “Preservation and adaptive reuse of historic buildings, viewshed and historic structures on the site is required. The design should incorporate the historic structures, features, and preserve the site’s heritage as a railroad terminal and gateway to Montclair.”

HPC RESPONSE: The Historic Preservation Commission strongly recommends that the *Revised Lackawanna Plaza Redevelopment Plan* maintain the term “viewshed” in the list of historic features and structures to be preserved. A viewshed is the area or locations visible from one or more specified points or lines, i.e., sightline. *The Secretary of Interior’s Standards for Rehabilitation* maintain that historic landscapes and significant viewsheds must be preserved. As the entire site of the Lackawanna Train Station is within the local landmark Town Center district, disruption of any viewshed affects the entire site. The Historic Preservation Commission strongly recommends that the viewshed from Bloomfield Avenue and the corner of Grove Street towards the historic Waiting Room building and the row of historic train sheds be maintained. This viewshed is a significant aspect to the historic integrity of the site and any changes to the sightlines to the building and adjoining structures would be detrimental to the integrity of the site.

2. III. D. Bulk and Yield

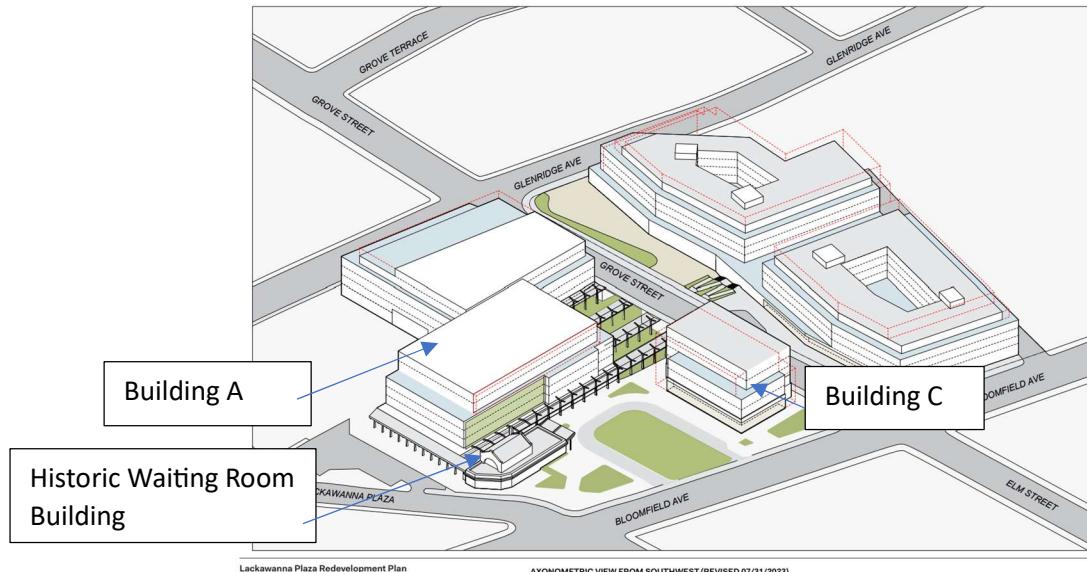
The HPC requested the replacement of the first sentence with: "Separation of upper floors to permit narrower towers in order to preserve the viewshed" with "The upper story step back of Building A must be at the 3rd floor (versus the 4th floor) to reduce its perceived scale relative to the train station and the neighborhood buildings."

The Planning Department response: Elimination of the viewshed will negate this recommendation. A new first-floor setback requirement of 22 feet has been added between Building A and the Historic Waiting Room. The historic skylight and passageway, measuring 22 feet, was uncovered during examination of the Historic Waiting Room and the Terminal Shed. It will be rehabilitated.

HPC RESPONSE: The Historic Preservation Commission supports the rehabilitation of the 22-foot-wide passageway between the Historic Waiting Room building and the new setback and step back requirements for Building A. However, while these additions are helpful, they are not sufficient to mitigate the massing of Building A which overwhelms the Historic Waiting Room building. The Secretary of Interior Standards recommends:

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.

The Historic Preservation Commission requests that Building A be reduced in height and the setback and step-back requirements be increased to diminish the sense of dominance of Building A over the historic Waiting Room.



July 31, 2023. Image. Presentation of Planning Board showing the massing of proposed buildings in the *Revised Lackawanna Plaza Redevelopment Plan* in relation to the historic waiting room building and the viewshed from Bloomfield Avenue.

3. Section III.F., Historic Features and Structures

The Historic Preservation Commission requested that eight historic elements be identified and illustrated in an Appendix.

Planning Board response: The Revised plan includes an inventory with images of the site's historic features and structures except for the Viewshed and the Copper Dome.

HPC RESPONSE: The Historic Preservation Commission strongly recommends that the term **viewshed**, identified as the open area from the corner of Bloomfield Avenue and Grove Street to the waiting room structure fronting Lackawanna Plaza, be restored to the list of historic elements. The Historic Preservation Commission supports the elimination of the Copper Dome on the Eastern parcel as one of the historic elements.

4. Section III, F., Historic Features and Structures

1.The Historic Preservation Commission requested that the word “shall” replace the word “should” regarding the standards of rehabilitation for the project. Additionally, the HPC requested: “If during excavation, original train tracks are uncovered, on either the west or east parcel, they should be adaptively integrated into the plaza.”

The Planning Department describes the treatment for each historic element as being individually “preserved”, “rehabilitated”, and “restored”, but does not identify which historic element will be addressed in each category. The watering trough and several steel stanchions are planned to be relocated.

2.The HPC requests that the sentence: “The Commission recommends that Building C be eliminated to protect and enhance the viewshed from Bloomfield Avenue to the historic waiting room. The Main Plaza and the Station Plaza should be a single coherent plaza to protect the viewshed and maintain the stanchions horse trough, and train sheds in their original locations. At a minimum, the Commission recommends that the base dimensions of Building C be substantially reduced, or the design of the building be otherwise altered so as not to interfere with the historic viewshed to the waiting room building and the identified historic structures and features”.

The Planning Department describes the treatment for each historic element as being individually “preserved”, “rehabilitated” and “restored”, but does not identify which historic element will be addressed in each category. The watering trough and several steel stanchions are planned to be relocated.

HPC RESPONSE: The HPC strongly recommends that an inventory of the number and the location of existing steel stanchions should be provided. Additionally, total documentation of all the historic elements, structures and buildings shall be required. This documentation should provide documentation of the architect, the buildings and their architectural significance, and a site-plan of the original train station, tracks, and various structures essential to its character as a transportation center. This would serve as documentation of the site as an important suburban railroad hub.

The HPC maintains that “all historic structures and features shall be retained in their original location.”

The HPC supports the incorporation of original train tracks into the plaza, if any should be uncovered during construction.

The HPC maintains its position on Building C: “The Commission recommends that Building C be eliminated to protect and enhance the viewshed from Bloomfield Avenue to the historic waiting room. The Main Plaza and the Station Plaza should be a single coherent plaza to protect the viewshed and maintain the stanchions horse trough, and train sheds in their original locations. At a minimum, the Commission recommends that the base dimensions of Building C be substantially reduced, or the design of the building be otherwise altered so as not to interfere with the historic viewshed to the waiting room building and the identified historic structures and features”.

The HPC concludes that the proposed set-back and the step backs of Building A do not adequately protect or enhance the viewshed. Reducing the base dimensions and increasing the set-back of Building C from Bloomfield Avenue is requested by the HPC to preserve and maintain the viewshed.

5. Section I.D. Context

The Historic Preservation Commission recommended that an additional paragraph be added to Section I.D. Context. This paragraph to read: “The Lackawanna Plaza Redevelopment Area is within the Town Center Historic District and Historic District Expansions (2002, 2003, and 2004) and includes structure(s) listed in the New Jersey Register of Historic Places (August 7, 1972), the Jersey Office of Historic Preservation Historic Sites Inventory of 1980, the National Register of Historic Places Inventory (January 8, 1973), and designated as a “key” building within the Town Center Historic District (May, 2003); and is deemed a “key” resource in the Thematic listing of Operating Passenger Railroad Stations (October 14, 1977) and is identified in the NJ CRGIS online viewer of the NJ DEP, Historic Preservation Office”.

The Planning Department amended the *Revised Lackawanna Redevelopment Plan* to include the above-mentioned paragraph.

HPC Response: The HPC agrees with the additional listing of the Lackawanna Plaza local, state, national and thematic listings, and the identification of the site in the NJ CRGIS online viewer of the NJ DEP, Historic Preservation Office.

6. Section I.D.1. Site

The Historic Preservation Commission requested that the graphic image of the historic site overlay be included in the *Revised Lackawanna Redevelopment Plan*.

The Planning Department added the requested image.

HPC Response: The HPC agrees with the addition of the image into the plan.

7. Access and Circulation III. D. 9

The Historic Preservation Commission requested “A meaningful pedestrian connection to Crane Park shall be provided”.

The Planning Department detailed problems associated with this request as involving an adjacent property owner.

HPC Response: The HPC acknowledges the problems associated with this request but encourages the creation or maintenance of a pedestrian connection.

8. II Goals and Objectives – Vision

The Historic Preservation Commission requested an additional sentence to read: “The Plan includes standards for high-quality, pedestrian-oriented design while respecting the historic character of the original Lackawanna Terminal waiting room, and additional features and structure of the entire site”.

The Planning Department agreed to this statement and incorporated it into the *Revised Plan*.

9. II Goals and Objectives – Land Uses

The Historic Preservation Commission requested this change:
Bullet 7 – Replace with “Adaptively reuse historic elements into the redevelopment project”.

The Planning Department agreed to this statement and incorporated it into the *Revised Plan*.

10. II. C. Goals and Objectives – Design

The HPC requested the following:
Bullet 1 – replace “reflect” with “complement”.
Bullet 8 – replace “recommended” with “required”.

The Planning Department agreed to these changes and incorporated them into the *Revised Plan*.

11. III C. Development Standards – III C. 1 Intent

1. The Historic Preservation Commission requested that Bullet 2 be replaced with: “Preserve the historic waiting room and terminal train shed. Any new building bordering these structures shall be set back and separate to accentuate the terminal train shed and the waiting room building”.

The Planning Department has changed the bullet to read: “As more specifically addressed in Section III.F., maintain and protect existing historic resources including the historic station Waiting Room and the Terminal Shed. Encourage reuse of historic features such as the illuminated perimeter Masonry Piers, Horse Water Trough and Train Platform Canopies with their distinctive concrete roofs and supporting steel columns (aka “stanchions”). Preserve all such elements in their current location or

relocate to other suitable locations on site as permitted in this Plan.”

HPC Response: The Lackawanna Plaza site is a Local, State and National Historic Site. As such, every effort to maintain the historic building and features is required. The Secretary of the Interior Standards maintain that a new use for an historic site requires minimal change to the defining characteristics of the building and its site and environment and that new work shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. As such, the HPC strongly feels that the new buildings, masses (height, width, and depth) are out of scale and disproportionate to the historic scale of the surrounding neighborhood and that the massive buildings will dominate and minimize the historic significance of the train station and the historic area.

2. The Historic Preservation Commission requested replacement of second sentence: “The retention in place of historic features such as the illuminated masonry piers, the horse trough, the steel stanchions which support concrete canopies known as ‘butterfly sheds’ over the train platforms, shall be applied”.

The Planning Department has agreed to incorporate this statement into Bullet 2.

HPC Response: The HPC strongly recommends that all the historic elements be maintained in their current location and not be relocated. The elimination of the horse trough from this sentence would allow the developer to create an alternative design. The addition of the following sentence should be included: “Every effort should be made to preserve the original location of the Horse Trough”.

12. VI Plan Consistency Review

The Historic Preservation Commission suggested that the Relevant preservation objectives, delineated on page 97 of the *Historic Preservation Element of the Master Plan* be included.

The Planning Department has agreed to add these objectives on pages 103 and 104 of the *Revised Lackawanna Plaza Redevelopment Plan*.

HPC Response: The HPC agrees that this is a beneficial addition to the Plan.

The Historic Preservation Commission looks forward to the development of the Lackawanna Plaza site. However, as designed, the *Revised Lackawanna Plaza Redevelopment Plan*, while encouraging and an improvement over the prior plan, overwhelms the site’s historic buildings, features, and the surrounding neighborhood. The changes incorporated into the *Revised Lackawanna Redevelopment Plan* are not compatible with the massing, size, scale, and rehabilitation of the historic architectural features which are significant to the integrity of the site and its environment.

The Historic Preservation Commission recognizes the cultural and historic legacy of the Lackawanna Plaza site. Based on our discussion, the HPC feels that important issues need to be further addressed within the context of the revised plan. It is hoped that a future *Lackawanna Plaza Redevelopment Plan* can be created which uphold the relevant preservation objectives as outlined in the *Historic Preservation Element of the Master Plan*:

1. Preservation and protection of historic fabric for present and future generations as a tangible link to the community's past and as a record of the Township history.
2. Promotion of sustainability through the retention of existing historic buildings.
3. Cultivation of civic appreciation of the Township's architectural, social, and cultural history and stewardship of its historic resources.
4. Safeguarding of the Township's distinctive visual character through the retention of existing resources and the discouragement of the demolition of historic structures.
5. Encouragement of contextually appropriate new design that contributes to a sense of cohesiveness and meets the Township's needs as a growing community.

Montclair Historic Preservation Commission
October 6, 2023.