



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

August 10, 2017

Katherine J. Marcopul
Administrator
Department of Environmental Protection
Natural & Historic Resources
Historic Preservation Office
PO Box 420
Trenton, NJ 08625-0420

RE: Sale of 90 Main Street, Flemington, New Jersey

Dear Ms. Marcopul:

I am writing on behalf of the National Trust for Historic Preservation to provide input on the proposed sale of 90 Main Street in downtown Flemington, New Jersey. It has been brought to our attention that Hunterdon County is considering sale of the publicly-owned property to a for-profit developer to facilitate a private mixed-use development.

The National Trust for Historic Preservation is a non-profit membership organization bringing people together to protect, enhance and enjoy the places that matter to them. By saving the places where great moments from history and the important moments of everyday life took place, the National Trust for Historic Preservation helps revitalize neighborhoods and strengthen communities, our work helps to spark economic development and promote environmental sustainability. With headquarters in Washington, DC, 9 regional and field offices, 29 historic sites, and partner organizations in all 50 states, the National Trust for Historic Preservation provides leadership, education, advocacy and resources to a national network of people, organizations and local communities committed to saving places, connecting us to our history and collectively shaping the future of America's stories. The buildings still at risk in downtown Flemington are a great example of the kinds of historic resources that the National Trust works to protect; they embody the importance of saving significant places.

As you know, in 2016, historic downtown Flemington was listed on the National Trust for Historic Preservation's *America's 11 Most Endangered Historic Places* list due to a proposal to demolish four important 19th century commercial buildings, including 90 Main Street, to make way for a 4-acre, 6-story mixed use complex. The National Trust's *11-Most* List is an annual call-to-action that highlights the most endangered historic

New York City Field Office

350 Fifth Avenue Suite 5240 New York, NY 10118

✉ info@savingplaces.org 📞 212.522.1208 SavingPlaces.org

resources across the entire United States. In its 30-year history, more than 270 sites have been listed, yet only about a dozen have ultimately been lost to demolition. Through the enlightened action of countless municipalities and with the support of diverse communities across the country, the remaining nearly 260 sites have been protected, preserved, and revitalized to help current and future generations understand significant moments in our collective history and allow them to experience, use, contemplate, and enjoy the historic building fabric in which consequential events have taken place.

We understand that the original mixed-use development proposal has been revised recently to retain the facades of both the Union Hotel and 90 Main Street. While this is a step in the right direction, the proposed modifications do not go far enough to ensure that the resources identified in our 11-Most list are protected and preserved for future generations. Instead, we strongly recommend that the private developer and the elected leadership of Flemington devise an alternative plan that would retain these vital historic structures in their entirety and incorporate all four of the existing buildings into any redevelopment plan approved for the site.

Specifically, the four endangered buildings include the Union Hotel, famous for its association with the Lindbergh trial, 78, 80, and 90-100 Main Street. All are part of the local historic district and are listed on the National and State Registers of Historic Places as part of the Flemington Historic District. The state and national listed district includes 600 buildings and is one of the largest and most architecturally rich districts in the entire state of New Jersey. Should the proposed full demolition of 78 Main Street, and 80 Main Street and partial demolition of 76 Main Street (Union Hotel), and 90-100 Main Street move forward, it would have a devastating impact on the town's historic core.

The National Trust recognizes there is a desire by town officials to redevelop and reinvigorate downtown Flemington to encourage much needed economic growth. We wholeheartedly support the town's efforts to revitalize and reinvigorate the community. However, we strongly recommend that Historic Preservation can and should play a critical role in any revitalization effort. While the current proposal to retain the facades of both the Union Hotel and the 90 Main Street is progress, it is not enough. It is our understanding that the four threatened structures occupy approximately 10-15% of the proposed development's footprint; the remaining development area contains parking lots or non-historic structures allowing ample space for appropriate and thoughtful new construction that could complement the restored buildings. We encourage the developer to fully restore these important historic structures – perhaps by taking advantage of the Federal Historic Tax Credit as so many successful restoration projects have across the country and throughout New Jersey. A total of 151 Federal Historic Tax Credit projects received Part 3 certifications from the National Park Service between fiscal year 2002 through 2016, resulting in over \$1 billion in total development.

Through our decades of on-the-ground experience and national advocacy, the National Trust has found that maintaining a community's historic assets has proven time and again to create jobs, increase property value and attract investment and enhance tourism. We have seen countless examples of disinvestment and abandonment that leave communities with vacant or rundown buildings. Public officials sometimes seek a quick or "easy" solution by razing the deteriorated structures – either themselves or via transfer to private development interests – in order to encourage or facilitate new development and/or investment. Unfortunately, demolition of historic buildings is rarely a change for the better, especially when they are associated with significant events in our nation's history. Decades of experience in the wake of urban renewal have proven this repeatedly across the United States in our largest cities, but also in our small villages and historic downtowns.

In a ground-breaking report produced by the National Trust's Preservation Green Lab, research demonstrated that established neighborhoods with a mix of older, smaller buildings perform better than districts with larger, newer structures when tested against a range of economic, social and environmental outcome measures. For example, areas with high "character scores" (i.e. those with smaller, older, and more mixed age buildings) tend to have a higher concentration of small businesses, women and minority-owned businesses, start-ups, and popular bars and restaurants. In Newark, for example, areas of the city that have older, smaller, and mixed-age buildings have 23% more jobs in small businesses and 40% more women and minority-owned businesses than areas that have larger newer buildings. The full *Older, Smaller, Better* report as well as our Atlas of ReUrbanism is available on our website at www.savingplaces.org.

In conclusion, based on decades of experience, years of research, and our 2016 identification of downtown historic Flemington as one of the nation's most endangered historic places, the National Trust does NOT recommend approval of this application to transfer 90 Main Street from Hunterdon County to a private developer to facilitate a mixed-use development that will result in the partial and full demolition of important historic buildings. This will result not only in an encroachment on the Flemington Historic District, but the loss of a vital piece of American history and demolition of a significant community asset for Flemington.

Sincerely,

Seri Worden

Seri Worden
Senior Field Officer
New York City Field Office
National Trust for Historic Preservation