



6 March 2023 (Via E-mail)

Janice Talley, PP/AICP
Director of Planning and Community Development
Township of Montclair
205 Claremont Avenue
Montclair, NJ 07042

Re: *Nomination Report for Local Landmark Status for the Label Street
Manufacturing District*
Montclair, Essex County, NJ

Dear Janice:

Connolly & Hickey has reviewed the *Nomination Report for Local Landmark Status for the Label Street Manufacturing District* (District Report) prepared in December 2022 for the Montclair Historic Preservation Commission by Kathleen M. Bennett and the *Landmark Nomination Report Review* (Review Report) prepared March 2, 2023 by E2 Project Management, LLC (E2PM) for 34 Label Street Association; we also refamiliarized ourselves with the *Historic Preservation Element of the Township (Montclair) Master Plan* (HP Element) prepared in 2016 by Building Conservation Associates. Unfortunately, all three documents have flaws and inconsistencies, but the arguments made in the District Report coupled with the HP Element outweigh those in the Review Report.

MLUL and the HP Element

The Review Report states that the HP Element does not include the area of Label Street as a potential historic district, which is incorrect. The area is clearly listed as part of the potential Walnut Street Business Area district, and the District Report clearly states its association with this potential district. Because the Montclair HPC in 2022/2023 is seeking to address this area alone and not with the Walnut Street Business Area should not preclude designation as there are provisions in the same statute that states:

The governing body may, at any time, adopt, by affirmative vote of a majority of its authorized membership, a zoning ordinance designating one or more historic sites or historic districts that are not based on identifications in the historic preservation plan element, the land use plan element or community facilities plan element, provided the reasons for the action of the governing body are set forth in a resolution and recorded in the minutes of the governing body.

Under 6.2 Potential Historic Resources, it is stated that “the goal of the survey was to assess areas within the Township that had never been formally surveyed, but which include historic resources that are potentially eligible for landmark recognition at the local and/or State and National levels. The 2016 field survey was not an intensive-level building-by-building survey. Instead, the survey was designed to broadly assess the architectural characteristics of the proposed areas for possible inclusion within the 2016 HP Element.” Each potential district in the HP Element provides a map, a one-paragraph summary, and a few photographs. The HP Element has a summary paragraph and a map for the Walnut Street Business Area showing that Parcels 1, 2, and 3 as referenced in both reports have the potential to be more formally recognized by the Township through the key map provided (page 86). The firm agrees that the background on each potential district noted is wanting

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but as noted previously was not meant to be inclusive and cover all aspects of every potential district. When the HP Element is looked at as a whole, there are clear recommendations that bolster the HPCs efforts to recognize districts and individual properties called out in the HP Element and are consistent with the Master Plan based on the following:

- *8.2. Historic Preservation Goal and Objectives* (page 97) states that the historic preservation goal is twofold:
 - “To advance the preservation of Montclair’s distinct community character through the identification, designation, and appropriate rehabilitation of historically and/or architecturally significant resources; and
 - To ensure new growth and development aligns with the character of the community.”
- *9. Recommendations* (page 99) outlines six recommendations that “provide a framework for historic preservation in shaping the future of the Township” and that “Local designation of individual landmarks and historic districts is the strongest level of protection for historic resources within Montclair. The Township should expand the quantity and quality of locally designated historic resources.” Two of the six relevant to the subject at hand are:
 - “Conducting a Township-wide survey to assess the eligibility of historic resources for local designation. This survey should target historic resources identified in this HP Element;
 - Promoting the identification, documentation, designation, and preservation of landscapes, objects, and non-residential structures significant at the local level.”

As such, the short summaries provided in the HP Element are just that, short summaries, and the HP Element outlines the next steps for designating these areas. The MLUL allows municipalities to identify, evaluate, designate, and regulate historic resources based on identifications in the historic preservation plan element of the Master Plan. The Label Street Historic District nomination focuses on one of several areas denoted in the Master Plan Element just at a smaller scale than shown, similar to the listing of an individual property denoted in a proposed district. According to an interpretation of the MLUL by the New Jersey Historic Preservation office, a historic preservation plan element is defined as:

- A. indicating the location and significance of historic sites and historic districts;
- B. identifying the standards used to assess worthiness for historic site or district identification; and
- C. analyzing the impact of each component and element of the master plan on the preservation of historic sites and districts”

https://www.nj.gov/dep/hpo/hpo_article.pdf

As previously noted, although N.J.S.A 40:55D-65.1 states historic districts are required to be based on identifications in the historic preservation plan element of the Master Plan, the same statute states that areas not explicitly identified in the HP Element can be considered for local designation with good reason, which is provided in the Nomination Report.

Period of Significance

The District Report provides a well-researched background on the Crump Label Company, its moving to Montclair, its longevity, its influence in bringing various types of paper manufacturing to Montclair, and the ties this manufacturing had to Toney’s Brook. The Review Report does a better job of laying out the chronology of construction particularly after the Crump Label Company evolved into other paper manufacturing enterprises on

the same site, the last of which was the New Jersey Coated Paper Company. This company left New Jersey in 1927, ending an over fifty-year presence of paper product manufacturing at the property bounded to the southwest by Label Street, southeast by Erie Street, northeast by Oak Place, and northwest by Forest Street. The Review Report confirms that the building located at 2 Erie Street and the building located at 6-10 Erie Street remain from within the Period of Significance, outlined below.

Industrial history in most areas is not a point on a timeline but a linear progression from the original manufacturer, in this instance the Crump Label Company, to subsequent interrelated and evolved companies and manufacturing processes. Industry changed rapidly in the last quarter of the 19th century into the early-20th century and companies not only adapted to embrace the ever-changing technologies but also that of the consumer. It is not uncommon, almost a given, that the original manufacturer in 1876 would not be the same company nor producing the exact same product fifty-years on. However, it is more common and reflects a strong pattern of events in industry for the origin company to be bought out, to change the type of product, but in essence to remain in the same line of business, such as paper manufacturing, which is seen in the Label Street properties.

When in 1927 the Township of Montclair purchased the former Crump Paper Company site, a series of recessions after World War I led to a decline in the U.S. economy, which is stated as the reason for the shutting down of the New Jersey Coated Paper Co. This occurred on the heels of the Great Depression, and the site was then used by the Montclair Department of Public Welfare during the depression to help those families that lost their jobs in places like the New Jersey Coated Paper Company. For years after the Great Depression there were several schemes to engage the other businesses, the state, and the federal government to use the property none of which really took hold or had longevity except for the lease and construction of a new Automobile Inspection Station in 1937 by the state at the corner of Label and Forest Streets. The property was used briefly by the Oiljak Manufacturing Company beginning in 1940, whose main operations were located on an adjacent site, and the property was sold at auction to Oiljak in 1946. Oiljak sold portions of the property beginning in 1950, made other changes and left Montclair in 1960.

The Review Report makes a better argument on the age of the concrete block building located at 18 Label Street as 1953/1954 than the Nomination Report.

As stated in both reports, the former Inspection Station was deemed eligible for the New Jersey and National Registers of Historic Places in 1998 by the New Jersey Historic Preservation Office and would be significant for its architecture and for its association with the need to regulate the use of the automobile and institute safety measures at a time when the automobile had gained in significant popularity, which presented problems not seen before.

Neither report states a Period of Significance for the three parcels in question. The broad patterns of development within Montclair inclusive of the ramifications of the loss of industry and manufacturing into the mid-20th century when Montclair became primarily a commuter suburb should form the basis of the Period of Significance. The railroad brought manufacturing, residential, and commercial development to Montclair but by the mid-20th century the residential and commercial development won the day and by 1960, manufacturing had all but disappeared after being the main thrust of development along Toney's Brook beginning in the early-19th century. As such, the recommended Period of Significance is 1876, the year paper manufacturing arrived along

the Toney's Brook to at least 1946 when Montclair sold the property to Oiljak, but could, with additional research not part of this letter, be extended to 1960.

Architectural Integrity

Connolly & Hickey disagrees with the Review Report that says the 2 Erie Street and 6-10 Erie Street buildings lack architectural integrity and neither reflect the history and development of manufacturing on the former Crump Label Company property. The National Park Service states the following about integrity:

Integrity is the ability of a property to convey its significance. There are seven aspects of integrity—setting, location, design, materials, workmanship, and feeling—but a property does not need to present all seven aspects. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.

Remember, “integrity” is NOT “condition.” And integrity is not assessed on a sliding scale: places either retain integrity—that is, convey their significance—or they do not. Try this test: Would a person from the past recognize the property as it exists today? If so, the property retains integrity.

(<https://www.nps.gov/subjects/nationalregister/sample-nominations.htm>)

There is no question that both 2 Erie Street and 6-10 Erie Street were once part of a larger industrial complex from the early-20th century despite changes made and would be considered contributing resources in the Label Street Historic District. Key elements that someone from 1927 would recognize at 2 Erie Street include its fenestration pattern, the corbelled segmental arched heads at the windows, the brick (which is mostly original about the first floor), the corbelling of the cornice, its location at the corner and in direct relationship to the railroad, and the two towers detailed with tall narrow windows with corbelled surrounds. Even the first floor cladding appears to be just that cladding and more than likely reversible. 6-10 Erie Street retains similar characteristics at its Erie Street and Oak Place façades including its brick masonry, fenestration patterns on the two primary elevations, segmental arched brick masonry openings, the shallow parapets finished with terra cotta copings, and the lantern at the roofline, which extends from parapet to parapet. The various additions are subservient to the main building and are simply adorned. For industrial buildings during a period of significant change and transitions in technologies, it is not unusual for only portions of the site to remain intact but the huge complex shown in the historic photographs can be difficult to adaptively reuse. However, the loss of fabric does not make those buildings that remain any less significant or diminish their ability to show that they are some of the only remaining vestiges that speak to a period of important industrial development in Montclair. Even the loss of fabric itself speaks to a period of transition in Montclair during the Great Depression into the mid-20th century when Montclair fully made the transition from a light industrial and agricultural community to a commuter suburb and commercial center serving its commuter base.

Keeping with an end date of 1946 for the Period of Significance, 18 Label Street would be a non-contributing resource since it was constructed c. 1953. The Inspection Station, which also retains a high degree of architectural integrity, was recently sympathetically rehabilitated and would also be a contributing resource in the Label Street Historic District.

Conclusions and Recommendations

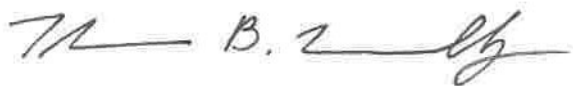
The Nomination Report, which was reviewed first and independent of the Review Report, has some noted deficiencies including the chronology of construction is not fully flushed out and is missing some historical components noted in the Review Report. The Nomination Report also does not clearly state a Period of Significance. It places an emphasis on the Crump Label Company, which is needed in order to show the significance of the site with regard to paper manufacturing, but should be revised to better show the evolution of the industrial buildings in the context of the later paper manufacturing companies. There are also a number of typographical errors and inconsistencies in the language that should be addressed.

The historical overview provided in the Review Report presents a strong argument in the reiteration of the site's historical evolution that the Period of Significance should be 1876, the year paper manufacturing arrived along the Toney's Brook, to at least 1946 when Montclair sold the property to Oiljak. The historical overview should be used by the HPC to update the Nomination Report.

However, the Review Report fails to justify why the Label Street Historic District should not be considered for designation by Montclair Township. As noted above, the portion of the district presented is denoted in the Historic Preservation Master Plan Element, albeit as part of a larger geographic area, and the site and its remaining buildings are some of the last remaining vestiges of Montclair's industrial past and continue to portray this history through their architecture. The history of this site is not viewed in isolation; the activities here impact the adjoining residential areas, the commercial and residential development along Walnut Street, and speak to the importance of Toney's Brook on Montclair's industrial heritage. As such, the Label Street Manufacturing District would meet Criteria 1, 3, and 5, at a minimum, as set forth in the Montclair Township Municipal Code Section 347-135A.

Please do not hesitate to contact Margaret Hickey, AIA, Historic Preservation Specialist or me should you have any questions or concerns regarding the above. Thank you for your consideration and the opportunity to review the Nomination and Review Reports for the Label Street Historic District.

Sincerely,

A handwritten signature in black ink, appearing to read "T. B. Connolly". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas B. Connolly, AIA
Principal Architect