

**MINUTES**

**188th MEETING**

**NEW YORK STATE BOARD FOR HISTORIC  
PRESERVATION**

**June 9, 2022**

**Meeting held by WebEx  
Based at Peebles Island  
Waterford, New York**

<https://youtu.be/oxH3U7pQ2DI>

The meeting was held remotely via WebEx video conferencing because the Open Meetings Law has been suspended due to COVID.

The following participants were present:

SRB Members

Carol Clark, Acting Chair  
Wint Aldrich  
Bryan Erwin  
Wayne Goodman  
Kristin Herron  
Jennifer Lemak  
Erika Krieger  
Gretchen Sorin  
Chuck Vandrei

Absent

Doug Perrelli, Chair  
Jay DiLorenzo

Division for Historic Preservation Staff (DHP)

\*Daniel Mackay, Deputy Commissioner for Historic Preservation  
Dan McEneny, Director, Division for Historic Preservation  
\*Kathy Howe, board secretary  
Virginia Bartos  
Jennifer Betsworth  
Daniel Boggs  
Olivia Brazee  
Erin Czernecki  
James Finelli  
Kathleen LaFrank  
Cordell Reaves  
\*Chelsea Towers  
Jennifer Walkowski

*\*Participated in the WebEx from Peebles Island*

Guests

Alexis Abernathy  
Clinton Brown  
Shanleigh Carrallo  
Robert Carrao  
Chris Cirillo  
Domonique Griffin  
Colin Knoer  
Robert Knoer  
Michael LaFlash  
Leigh Melander  
Catherine Mikic  
Larry Moss  
Angelo Natale

Michael Radlick  
Brett Walters  
Crystal Walters  
David Witt

### **Call to Order**

The meeting was called to order at **10:03 AM** by Carol Clark who served as Chair in Doug Perrelli's absence.

### **Roll Call**

The roll was called, during which the following responded as present and briefly described their role or function as it relates to their service on this board.

- Wint Aldrich: Historian, former Deputy Commissioner for Historic Preservation
- Carol Clark: former Deputy Commissioner at NYS Parks, Adjunct Professor of Historic Preservation at Columbia University, Pratt Institute, and the NYU School of Professional Studies
- Bryan Erwin: Chair of the State Council of Parks and Long Island State Park Commissioner
- Wayne Goodman: Executive Director, Landmark Society of Western New York
- Kristin Herron: Program Director for Architecture + Design | Museums, New York State Council on the Arts
- Erika Krieger, Registered Architect representing the NYS Department of State
- Jennifer Lemak: Chief Curator of History, New York State Museum, State Education Department
- Gretchen Sorin: Director of the Cooperstown Graduate Program in Museum Studies
- Chuck Vandrei: Archaeologist, Agency Preservation Officer, Department of Environmental Conservation

There being **nine** members participating, a quorum was confirmed.

Acting Chair Carol Clark reminded all that the voting method for online meetings is that following a motion and second, there will first be a call for any "opposed" or "abstaining" votes. If there are none, the motion is carried by unanimous consent.

### **Deputy Commissioner's Report**

Daniel Mackay

Daniel Mackay thanked Carol Clark for stepping into the acting chair role at this meeting in Doug Perrelli's absence. Daniel reported that it has been a very busy quarter at the Division for Historic Preservation, having completed a full transition of the senior staff team, including the recent promotion of Kathy Howe as Director of the Community Preservation Services Bureau. This promotion completes the full transition of a new senior staff team at DHP including Dan McEneny Director of DHP, Nancy Herter, Director of the Technical Preservation Services Bureau, and Greg Smith, Director of

Historic Sites and Parks Services Bureau. The senior team works well together, they are forward-thinking, and they are eager to expand the capabilities and extend the accomplishments of this agency. He noted, however, that we have not yet backfilled the vacated unit manager positions from which they were promoted and so there is quite a workload on these four staff at this point in time. It is a priority to address the backfills at the unit management level so that DHP can advance the next generation of unit leadership. Two long unfilled positions in the conservation labs have been filled by Lauren Ross, formerly of the Baltimore Museum of Art, who has been hired as the Framing and Gilding Conservator, and Paige Schmidt, formerly of the Mariners Museum in Newport News, who is the new Furniture Conservator. They will start in a few weeks. We had permission to fill these positions in February 2020, but these were rescinded when Covid struck. Daniel is grateful that the Commissioner and executive staff restored these positions for hire this past fall and have made a new commitment to the extraordinary and unique capabilities of the conservation team in the east wing.

Policy and fiscal updates: The enacted state budget agreement increased the agency fill level. Over the winter months the agency has met that fill level. There was an increase in the agency's operational budget in the enacted budget agreement and an increase in the agency's capital budget. The legislature added 50 million dollars to the Chamber's proposal and the agency now has 250 million dollars in the capital budget allocation to undertake capital projects across the parks and historic sites system in state fiscal year 2022-2023. This is an extraordinary development for the agency. The agency will spend that money quickly and effectively and it's nice to see the agency's ability to meet long unaddressed capital improvement needs across the system. The Environmental Protection Fund was passed with the funding allocation of 400 million dollars; this is a hundred million dollars over the statutory mandate. This will increase the amount of funding available for agency grant programs and open space acquisition, and we expect to see continued progress in acquiring buffer lands and additional properties for the state park system as well as additional funds to re-grant to local and regional partners. The Bond Act proposal was also authorized; this 4.2 billion dollar proposal for environmental funding will be on the November ballot and there are a number of programs in that proposal that will also benefit the agency.

Daniel made note of two master planning efforts that are underway in the historic site system. The agency is launching master planning efforts at both John Brown Farm State Historic Site, outside of Lake Placid, and at Grant's Cottage in Wilton. Additionally, it has finally been announced publicly that a new visitor orientation center will be built at Olana State Historic Site. That facility is undergoing final permitting and planning and site construction will begin in late fall. The Olana Partnership has undertaken all fundraising efforts for that project and the new visitor center will be a significant amenity that will be carefully sited on that property. The board has heard past references to the transformative investment underway at Phillips Manor Hall State Historic Site in Yonkers. The restoration of and improvements to the Manor Hall are complete, including a new elevator tower which has been beautifully executed. The finishing touches are now being done on the landscaping and the caretaker's house

upgrades. The exhibit installation will begin this summer, with a planned opening in September 2022, and we will look forward to inviting this board to that ribbon cutting.

The Historic Business Preservation Registry that Christina Vagvolgyi briefed you on at the December 2021 meeting was publicly launched in late March 2022 to highlight New York State businesses that have been in operation for at least fifty years and have contributed to their community's history. This program debuted with 100 listings from across the state and the launch of a new agency web page featuring the registered businesses. The link to the website is <https://parks.ny.gov/historic-preservation/business-registry/>. The launch of that program has generated the next wave of interest in nominations and we'll be updating the webpage on a rolling basis.

Before Daniel handed off the presentation of the revamped Historic Barn Rehabilitation Tax Credit program to Olivia Brazee, he acknowledged Senate sponsor Michelle Hinchey and Assembly sponsor Didi Barrett and their respective staff, who consulted extensively with DHP office regarding reviving and revising this tax incentive program. They provided staff, including Olivia Brazee and Bill Krattinger, ample attention to inform the next iteration of this most needed incentive. DHP is very pleased with the input we had with the legislative staff and the members, and we have a great new barn tax credit as a result. DHP is certainly pleased that the legislation earned the support of Governor Hochul. Daniel Mackay gave special thanks to Olivia Brazee and her work. In the four and a half years between the unintentional loss of the former barn credit program and the revival in this current format, Olivia maintained a very detailed file of barn owners across the state who were upset to have lost the incentive and eager for its return. When this program was relaunched this spring Olivia had 150 inquiries in a contact file that we could immediately notify to let them know that the incentive was newly available and newly enhanced.

### **NYS Historic Barn Rehabilitation Tax Credit**

Olivia Brazee

Olivia Brazee, Historic Site Restoration Coordinator in the Technical Services Unit of DHP, reported on the specifics of the NYS Historic Barn Rehabilitation Tax Credit program. She noted that we had a barn tax credit program starting in 1997 but that program went away when the new federal tax code took effect in 2018. There was great support and leadership for new barn tax credit legislation, as previously noted by Daniel, by Senate sponsor Michelle Hinchey and Assembly sponsor Didi Barrett. The Hinchey/Barrett bill revives this tax incentive by placing it in state tax law and expanding eligibility so that more historic barns throughout the state may qualify. The legislation was signed by Governor Hochul on December 21, 2021.

Owners of barns may qualify for the New York State Historic Barn Rehabilitation Tax Credit, which is a state income tax credit equal to 25 percent of Qualified Rehabilitation Expenditures. The barn tax credit aligns with one of the goals in the Statewide Preservation Plan by providing financial incentives for rural and agricultural buildings. Olivia discussed the major requirements of the program. To qualify for the credit the

owner of the barn must be a New York State taxpayer. The barn must have been constructed before 1946 or it must be a contributing building to a property listed in the State or National Register of Historic Places. The barn must have been used as an agricultural facility or for related purposes. Qualified rehabilitation expenditures must amount to \$5,000 or more. The rehabilitation project must not alter or change the historic appearance of the barn. The barn must not have been used as a residence within one year prior to applying for the credit. The project must not convert the barn to a residence. The credit may be applied to certain work that has already been completed. Olivia Brazee noted that one of the great things about the program is the five-year look back allowing people who file for the credit to claim work that was done within a five-year period immediately prior to filing. She showed a slide of the application, which is similar to our homeowner tax credit application form in that it comprises three parts. The Part 1 provides the baseline information about the applicant and barn. This helps the DHP establish that the barn meets the qualifications for the program. The Part 2 establishes the proposed work and breaks down the work items into categories. It also includes a brief description of the barn's existing condition, the proposed rehabilitation, estimated costs, and references to images. The Part 3 includes photographs showing the work after completion. The credit is claimed for the tax year in which the Part 3 is approved. She stressed that the application is quite simple and easy for the applicant. The application with instruction sheet, FAQs, and a list of qualifying rehabilitation expenditures versus non-qualifying rehabilitation expenditures were posted on DHP's website in early May. So far DHP has received five applications, but at least 150 people expressed interest in applying for the program since the fall when word started getting out about the new barn tax credit. Olivia has started giving workshops on the new tax credit program in-person and via webinars.

Carol Clark thanked Olivia for her report and Daniel for the Deputy Commissioner's Report. Daniel added that we are very pleased that the barn tax credit has been reestablished here in New York State. He added that we have already heard from advocates that ideally would like to make this credit refundable for people with lower annual incomes, a provision already available under the state homeownership tax credit program.

### **Nomination Reviews**

Kathy Howe, Introduction/Acknowledgement of Guests.

Kathy noted that for this meeting the nominations are being organized by historic themes or architectural typology rather than geographically.

### *Commemorative*

#### **Nomination 1: Fancher World War II Memorial, Murray Vicinity, Orleans County**

Presented by: Virginia Bartos

Discussion: none

Motion to approve: Wayne Goodman

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

*Black Social History*

**Nomination 2: Buffalo Public School # 32 (PS 32) aka B.U.I.L.D. Academy, Buffalo, Erie County**

Presented by: Jennifer Walkowski

The nominations for the Buffalo Public Schools #32 and # 92 as well as the New Skateland Arena intensive level documentation represent the culmination of DHP's African-American civil rights project funded by a Civil Rights grant from the National Park Service. These three properties have associations with the B.U.I.L.D. organization (Build, Unity, Independence, Liberty, and Dignity) in Buffalo.

Discussion: none

Motion to approve: Kristin Herron

Second: Gretchen Sorin

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 3: Buffalo Public School # 92 (PS 92) aka B.U.I.L.D. Academy, Buffalo, Erie County**

Presented by: Jennifer Walkowski

Discussion: none

Motion to approve: Kristin Herron

Second: Gretchen Sorin

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**New Skateland Arena, Buffalo, Erie County**

Presented by: Jennifer Walkowski

Discussion: Kathy Howe pointed out that this is an informational presentation only and not a nomination proposal. Our attempts to connect with the owner of the building have not been successful so the property cannot be nominated at this time.

After the presentation, Kathy introduced two scholars who have done extensive research on B.U.I.L.D.'s history - Shanleigh Corrallo and Dominique Griffin. Shanleigh Corrallo thanked the SHPO and said that it was exciting to see buildings associated with

B.U.I.L.D get preserved as they are such important parts Buffalo's Black Power history. Domonique Griffin said that being from Buffalo and seeing the recognition of B.U.I.L.D.-associated properties is really powerful; she is excited about the prospect of these being preserved and recognized as cultural landmarks for the community.

Gretchen Sorin said that New Skateland Arena inventory form represents a terrific amount research that is very well done but clarified that roller skating is not just an exclusive African-American entertainment but that it is an American form of popular culture. She said that African-Americans were a part of American culture but due to segregation they had to identify places where they could be safe and welcome and so they had separate skating rinks where they could enjoy this all-American form of recreation.

Kristin Herron asked if the staff's unsuccessful attempts to contact the owner of New Skateland Arena was the reason preventing this from moving forward as a nomination. Kathy Howe responded that a letter was sent to the owner that mentioned the potential rehabilitation tax credits. She also left phone messages for the owner and had Preservation Buffalo Niagara and the City of Buffalo's community liaison for that neighborhood stop by the arena (which appears to have been closed due to Covid) but, despite our best faith efforts to have a conversation, we never heard back from the owner. For now, staff wanted to share with the Board this important research done as part of the NPS Civil Rights grant.

#### **Nomination 4: Philip Schuyler Mansion Additional Documentation, Albany, Albany County**

Presented by: James Finelli

As part of his presentation, James Finelli explained that additional documentation can be added to properties that are already listed. He noted that many of our older nominations from the 1960s and 1970s are brief, may have factual errors, are often architecturally focused, and overlook the histories of underrepresented people such as African enslaved individuals. He said that this additional documentation is the first of a series of nomination amendments that our agency hopes to make to some of our state historic sites. As part of this initiative, we have been working with Cooperstown graduate students and staff at the Bureau of Historic Sites to conduct research and prepare documentation.

Discussion: Cordell Reaves of the Bureau of Historic Sites (BHS) provided background on the research and interpretive work of Historic Sites and how that fits into the current initiative of nomination amendments. He said that this process of looking closely at the lack of presence among people of African descent and the stories we were telling began years ago. At that time an interpretive and exhibit research project by Travis Bowman of BHS and the staff at Crailo State Historic Site resulted in the *Dishonorable Trade* exhibit which was quite successful. When James Finelli brought up this opportunity to incorporate the work that has been going on for years at our historic sites, including Schuyler Mansion, he thought it was a wonderful project because this allows us an



opportunity to correct the record. It also helps to establish the foundation for improved scholarship going forward. As researchers use amended nominations, they are seeing the presence of people of African descent, free and enslaved, at these historic sites. The story of how they were treated and regarded as property has been left out of most of American history but especially in the colonial period.

Motion to approve: Wayne Goodman

Second: Jennifer Lemak

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

### *Industrial*

#### **Nomination 5: Boardman and Gray Piano Company, Albany, Albany County**

Presented by: James Finelli

Discussion: none

Motion to approve: Erika Krieger

Second: Wint Aldrich

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

#### **Nomination 6: Hickey-Freeman Company Building, Rochester, Monroe County**

Presented by: Virginia Bartos

Discussion: none

Motion to approve: Gretchen Sorin

Second: Wayne Goodman

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

#### **Nomination 7: Goff, Way, and Brand Leaf Tobacco Warehouse, Elmira, Chemung County**

Presented by: Daniel Boggs

Discussion: none

Motion to approve: Wint Aldrich

Second: Jennifer Lemak

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 8: H. M. Quackenbush Factory, Herkimer, Herkimer County**

Presented by: Erin Czernecki

Discussion: Erika Krieger asked what development project is planned for this property. Erin Czernecki answered that she did not know what project might be planned for the former factory at this time. Gretchen Sorin added that it is a gorgeous building that meets the criteria and that it is located in a very depressed area of the state, so it is important that it be rehabilitated.

Motion to approve: Gretchen Sorin

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 9: Illinois Alcohol Company Building, Buffalo, Erie County**

Presented by: Jennifer Walkowski

Discussion: Wint Aldrich remarked that the historic owners showed extraordinary *hutzpah* to call themselves an alcohol company.

Motion to approve: Wint Aldrich

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 10: Aldrich & Ray Manufacturing Company Building, Buffalo, Erie County**

Presented by: Kath LaFrank and Jennifer Walkowski, SHPO staff  
Michael LaFlash, Heritage Consulting

Kath LaFrank:

Kath LaFrank began her part of the presentation by introducing Michael LaFlash of Heritage Consulting, owners Bobby Corrao and Angelo Natale, and the owners' representative, Robert Knoer. She stated that most of the board members were familiar with the property, but for those who were not on the board in 2019, or for those who may have forgotten the sequence of events, she would provide a brief project history. She noted that following her remarks, Jennifer Walkowski will give a presentation followed by a presentation by the consultant, Michael LaFlash, and that she would then sum everything up before board discussion.

Kath said that in 2019, a proposal to nominate this building was brought before the board. Staff gave a presentation, as did the owner's original consultant; and, after substantial discussion, the board rejected the proposal based on the building's lack of integrity.

The owner then appealed the board's rejection to the National Park Service, which, after reviewing the nomination and board minutes, rejected the appeal. The owners then sued NPS and won in the sense that NPS was directed to prepare a more thorough report on why the building did not meet the criteria. The court did not make any comment on the building's eligibility.

Before NPS responded, the owner withdrew the nomination and turned it over to a new consultant, Heritage Consulting, which is representing the owners today.

In 2021, Heritage submitted a revised nomination to the SHPO, asking for a preliminary determination of significance in order to qualify for the federal tax credit program. The nomination was substantially different from the previous one because it suggested a period of significance *only* from 1888-1893, before the fire of 1893 that destroyed the original Aldrich and Ray Building. We sent it to NPS without a recommendation, but we outlined several concerns in our cover memo.

NPS denied the request for certification in October 2021. NPS's letter both questioned the specific argument that the building had survived the fire and reiterated the reason that the nomination had originally been rejected by the SRB and the Keeper: that the building's significance is related to the *entire* history of the Aldrich and Ray Company and that the surviving fragment lacks the integrity to represent that history. Kath noted that the board members had received a copy of the NPS letter before this board meeting, along with the *third*, most recent draft nomination (discussed below).

In December 2021, the consultant submitted a third, slightly revised draft, requesting a hearing by the SRB. This is the draft that is being reviewed by the board at the current meeting. This draft still begins the period of significance with the initial construction of the building in 1888 and states that the building "remains *fully intact* to its period of construction," even though it allows that at least *some* part of it was destroyed and rebuilt after the fire. The new draft also expands the period of significance to 1953, now recognizing that the full history of the company is important, without acknowledging that at least half of the complex that represents the company's operation in the twentieth century no longer survives.

Note: The pre-SRB memo to the board from Kath LaFrank and NPS letter from Roger Reed are appended to these minutes.

Jennifer Walkowski:

Jennifer Walkowski showed an image of what the building looked like when it was initially presented to the board. Since this time, rehabilitation work has proceeded, and the building has received its Certificate of Occupancy. Jennifer then briefly summarized the building's history:

The Aldrich and Ray Company was an important manufacturer of copper and brass products in Buffalo during the late 19th and early 20th centuries. The company was

founded in 1879 by Schuyler Aldrich. In its early years, it operated at 2 different locations, at 14-20 Perry and 74 Washington. In 1884 Isaac A. Aldrich entered the firm, and in 1886 George A. Ray was admitted as a partner. The company moved to 1491 Niagara Street in 1888 and, shortly thereafter, Aldrich and Ray built its first manufacturing facility on the current site.

An 1889 Sanborn map showed the original 4-story factory. Jennifer pointed out to the board members that they should also note the neighboring 2-story police station on the right-hand side of the map images. As she discussed in the last presentation in 2019, Sanborn maps were developed for fire insurance purposes, which relied on precise accuracy. Less than a year later, in 1893, the Aldrich and Ray factory was destroyed by fire. While most reports on the extent of the damage of the fire indicate heavy damage, it would appear that - at the very least - substantial interior damage was done to the Aldrich and Ray building, as well as the police station nearby, although some brick walls may have survived. Some reports indicate the total loss and collapse of the Aldrich and Ray plant. After the fire, the company rebounded and purchased the adjacent site to the north, the location of the police station, which was seriously damaged in the same fire. Following the 1893 fire, the company did not close up or relocate, instead, it rebuilt and substantially enlarged.

Jennifer showed a ca. 1900 rendering that indicated that by 1900 Aldrich and Ray had constructed a U-shaped building more than twice the size of the original. While the board had previously had some discussion on how accurate this rendering may have been, new information shows that it was, in fact, quite accurate. The rendering shows that the factory had expanded significantly after the 1893 fire, incorporating at least a portion of the remnants of the police station, and adding a substantial rear wing. The new building was 3 stories tall and thirteen bays wide. Two wings, eleven and nineteen bays deep, extended back from the main block on either side of a drive-through from Niagara Street. A 4th floor was added to the south wing in 1904.

The rendering is supported by the 1900 Sanborn map, which shows the same configuration and also shows the offices in the northwestern quadrant, while the rest of the building was laid out for manufacturing and storage spaces.

This revised nomination presents one of the most exciting discoveries about this building; a historic photo of the front elevation dating to 1908. Here, the exact appearance and size of the building during the Aldrich and Ray and George A. Ray era can be understood. The Aldrich and Ray company integrated some portions of the former police station, and you can see the 4th-floor addition that was made in 1904. Note the carriageway that provided internal access to the property, created in the gap between the remnants of the original building and the police station. Also note the prominent cornices on the building and the painted signage which spans the entire front of the building, unifying the façade. This photo is largely consistent with the information in the ca. 1900 rendering.

The Aldrich and Ray Company and its successor firm, the George A. Ray Manufacturing Company, occupied the U-shaped building until 1953. One can see in the 1950 Sanborn map that the George A. Ray Company still occupied most, but not all of the building; and a series of Sanborn maps indicate that the building remained entirely intact to its construction period. The same U-shaped configuration remained as built until 1954 when a one-story gantry crane wing was added at the southeast corner by a subsequent company, shown on the 1961 Sanborn. The maps show that until well into the mid-20th century all of Aldrich and Ray and its successor company's functions were carried out in the U-shaped complex and the building retained its architectural integrity as a typical late 19th-century industrial factory.

In 1976, while under the ownership of the S.A. Day Company, the entire north half of the building was destroyed by fire, leaving only the south wing of the former Aldrich and Ray Company building and the 1954 addition added by a later company.

Jennifer showed some current photos of the building. She noted that the paint has been removed from the front elevation, revealing the original brick and exposing some of the historic painted signage that was seen in the 1908 historic photo.

At the interior, the ground floor houses modern medical offices, while the upper floors are being converted to apartment housing.

To be eligible for the State and National Registers, a resource must be significant and intact enough to convey that significance. It must retain those features, spaces, details, which define the character of the resource. Both nomination versions have described the importance of the Aldrich and Ray company to the industrial history of Buffalo. But the concern here has always been a lack of integrity. The company continued operations after the 1893 fire, expanding and growing its business and its building. It did not become less important after the fire, in fact, it became even more prominent and successful, continuing in business for some 60 years. We cannot discount the company's history after the 1893 fire. But as it is currently, the building stands in a form that only existed after the 1976 fire. A fire that occurred well after the era during which Aldrich and Ray and its subsequent iterations were operating within the building from 1893 to 1953. This fire caused the loss of the office, the heart of the company's operations, and substantial areas of manufacturing. The building has lost more than half of its historic fabric from the era during which it housed Aldrich and Ray and has gained a non-historic addition. The building that stands presently is a fragment of the once-thriving metal works and no longer conveys that company's significance.

Michael LaFlash:

Michael LaFlash of Heritage Consulting stated that the project team applied for the tax credits a few years ago and that the owners have done their best to preserve the historic integrity based on the Secretary of Interior's Standards. He stressed the tax credits are a big part of the financial component of this rehabilitation project. There was

significant local political support for the project as shown by letters of support that were submitted to SHPO and were, hopefully, shared with the board.

Michael LaFlash offered a brief recap to the board, as Jennifer Walkowski and Kath LaFrank had previously provided an extensive overview of the property's history. He then outlined the salient points of the most recent nomination proposal submitted by Heritage. He stated that the building was significant under Criterion A under the category of Industry as an excellent example of a stamped pressed copper and brass manufacturing facility. He stated that it was a rare surviving example of a copperworks building in Buffalo, which was once a huge industry in that city around the turn of the century, and noted a period of significance of 1888 to 1953. As previously noted by Jennifer, Aldrich and Ray and later the George A. Ray Company was very significant in the pressed copper and brassware industry as one of the largest manufacturing concerns of that type in the state, selling their products on a national level. Michael generally reiterated the same timeline of events that Kath and Jennifer previously presented; however, he disagreed on several points. He agreed that the original building was constructed in 1888 and that by 1892 the owners had constructed a fourth-story addition. However, he held that the 1893 fire had resulted only in the removal of the fourth story, rather than demolition of the entire building, and that in 1904, the fourth story was reconstructed. He also held that the police station was connected to an existing building, not a new one. In referencing a photo, he said that one can see the former police station, the 1893 connector, and the subject building. He suggested that the subject building could be said to stand alone, proud of the police station, indicated by its setback and foundation lines. He noted that this was further explained in the nomination. However, after asserting that the building survived from 1888, he reiterated the argument that it was an intact example of a late nineteenth century industrial building.

He concluded by stressing the importance of the discussion of integrity, noting that National Register Bulletin 15 identifies a certain component where rare examples of a building type can be considered significant or can retain integrity so long as they retain enough of it or are a rare surviving example. As noted in Bulletin 15 comparative information is particularly important when evaluating the integrity of a property that is a rare surviving example of its type. As such the property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alterations or fewer features, provided that enough of the property survives for it to be a significant resource.

Michael stated that Aldrich and Ray retains key elements of a purpose-built late 19th and early 20th century copperworks as shown by the open floor plan, hardwood flooring, and the exposed wood structure throughout. One can see the simple brick exterior but most important are the rooftop chimneys, which resemble battlements and which distinguish this from other factories. This feature makes the building stand out as a representative example of its type. The chimneys also make the building stand out from a generic warehouse building from that same time period.

Again, he argued that the rarity and poor condition of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource. Buffalo was one of the largest copper-producing manufacturing centers in the U.S. The vast majority of this industry was situated in the area downtown along the riverfront in the Cobblestone District, which has been largely destroyed and lost. Aldrich and Ray was one of the most preeminent companies in this industry in all of Buffalo. They were originally in the Cobblestone District and then moved to a purpose-built facility in Black Rock. Exhaustive research undertaken through city directories, industry journals, historic maps, etc., indicates that the subject property is the sole known extant purpose-built example of its typology in the city.

Michael showed two side-by-side aerial photos: one from the 1930s and the other from a current-day Google map of the Cobblestone District where the Buffalo Sabers arena/Key Bank Center is now located. Buffalo's copperworks industry was historically located in this area, which largely consisted of Civil War-era warehouse buildings or factory buildings; these were simple brick buildings. Heritage Consulting's research did not reveal any purpose-built copperworks remaining in the Cobblestone District. There is an Aldrich building on Illinois Street, but that building is much later and from a different company and is itself only a small fragment of a formerly large complex.

To conclude, Michael stated that the Aldrich and Ray Company was significant to the local manufacturing of Buffalo's copperworks industry and remains a rare surviving example of that building type. It maintains the necessary integrity as defined by Bulletin 15 in that it is able to convey its historic association and, in addition, with the major loss of other copperworks examples in Buffalo this building is an important chapter in Buffalo's industrial history. Even with the loss of the north section the resource still conveys its full story through its extant features. It is important that the Aldrich and Ray Manufacturing Company be included in the National Register so that an industry integral to turn-of-the-century Buffalo is recognized. There are no other remaining resources in Buffalo that convey this story.

Kath LaFrank:

Before the discussion, Kath LaFrank reminded the board that the sole question is, does this building, as presented in this nomination, meet the criteria? She stated that the staff position is best expressed in the letter by reviewer Roger Reed of the National Park Service (which the board had received). She and Jennifer had selected a few passages from Roger's letter that seem especially relevant and, even though this nomination differs just slightly from the one Roger reviewed, the salient points apply. SHPO staff agree with Roger that the historical significance of Aldrich and Ray is documented in the draft nomination. Roger added, however, that the subject property comprises just one component of a factory that is well documented in historic insurance maps, city maps, and photographs. He noted the loss of all components but the subject building. In addition, he wrote that the case for significance for the original building as a rare surviving example of a 19th-century copper mill is dependent on an argument, the very

basis of which is called into question by the extent of destruction caused by the 1893 fire. Roger concluded that the 1880 building was, at the very least, gutted; the interior is entirely wood and shows no evidence of fire damage. A narrow interpretation of the 1893 fire damage which treats the contemporary newspaper accounts as exaggeration must still conclude that all wood components were destroyed or damaged beyond salvation; therefore, he says, the interior reflects the integrity of the factory post-fire. More importantly, nothing appears to support an argument that the design of the mill is an exceptional representation of a type, period, or method of construction, and finally, he reiterated that the emphasis on the early factory avoids the issue of the extensive loss of the adjacent buildings that were critical in the operation of the factory during its most prosperous years after the 1893 fire. If, as the draft nomination claims, he says, the company became an industry leader this happened in the early 20th century, not in 1888-1893 and again he pointed out that everything that represented the operations of Aldrich and Ray during its most prosperous post-fire expansion and prosperity has been demolished except for the subject property. Thus, staff conclude that, first, the original building does not retain any integrity to the pre-1893 fire and, second, even if it did, the typology defined in the nomination is not rare but typical of all mill buildings. Brick exteriors, exposed wood structure, open floor plans, and chimneys are the most common elements of industrial architecture of the late 19th century. Finally, based on the extensive loss of components that were crucial to the operation of the company during its most prosperous years, the subject building does not appear to retain sufficient integrity for individual listing.

#### Discussion:

Carol Clark said that she has had over 40 years of experience working with National Register criteria and that this has been central to the teaching she has been doing over those four decades. She added that she has also worked on tax credit nominations of a variety of sorts so, in her opinion, she concurs with the finding of the Department of the Interior/National Park Service and SHPO staff that the building is not eligible for the National and State Registers. She reminded the board that their main role is to determine if a building has the significance that is indicated by the criteria. She then suggested that the board consider making a motion to reject this nomination and encouraged discussion on that motion.

Wayne Goodman commended the owners of this attractive building and he then shared in everyone's concern about the integrity. He asked when the building was put into service.

Michael LaFlash responded that it was put in service in 2021.

Gretchen Sorin expressed concern that the Secretary of the Interior's Standards fail to reflect local historical significance as opposed to simply architecture. She said that she understands that the SRB is an architectural preservation board but, as someone who's dealt with so many buildings that are key within the African-American community that are completely ignored because they may not have the required architectural integrity,



she finds it concerning that the board is only looking at this building for its architectural significance rather than its historical significance to the community. She noted that there are so many of these types of buildings that are just standing vacant and here is one being restored, and it would be a shame if the board couldn't support it. She said that she understands why the board would want to say that it's not eligible, but it pains her deeply.

Carol thanked both Gretchen and Wayne for their comments and asked if any other members of the board wished to comment.

Michael LaFlash commented on what SHPO staff had mentioned about the interior. He said that although the interior likely dates to that post-fire period, probably around 1900 or so, the interior wood structure is still evident and retains that turn-of-the-century industrial appearance.

Kath LaFrank noted that this is not what the nomination says. Rather, the nomination says that the building retains integrity from the 1890s. Even at the most generous, it is just the walls that remain though some of the newspaper accounts do say it was nothing but a hot heap of rubbish.

Carol made a motion to reject the nomination. She asked for a second. Wayne seconded the motion to reject the nomination. Carol then asked for anyone who is opposed or abstaining. Gretchen Sorin said that she abstained. Kathy asked Carol to call out each member of the board individually so that it is clear, for the record, how each is voting on the motion to reject the nomination on the basis that the building does not meet the National Register criteria.

Kristin asked for clarification if each member had to state their reasons for how they were voting or if a simple yes, no, or abstention is sufficient. Kathy responded that board members simply need to vote and do not need to provide their reasoning.

Wayne said that he didn't disagree with Gretchen's comments and that this is one of those situations where he thinks all of us in the preservation community when we see buildings languishing that we try to encourage redevelopment. He said that he certainly wants to applaud the efforts to rehabilitate this building and that Gretchen's comments bring up a larger issue in the preservation profession regarding the Secretary of the Interior's Standards. The future of those standards and perhaps some revisions at the federal level are needed. He said what he is struggling with is the integrity of this building based on the application and the intersection with those standards.

Carol said that she appreciated Wayne's comment and thought that his point is very well taken. But, she said, the board has to look at the building as it stands today and make our judgment. Carol added that she respectfully applauds Gretchen's comments. She then took a vote on the motion to reject the nomination.

Motion to reject: Carol Clark

Second: Wayne Goodman

Board members voting to reject the nomination: Wint Aldrich, Kristin Herron, Jennifer Lemak, Bryan Erwin, Chuck Vandrei, Erika Kreiger

Opposed: none

Abstentions: Gretchen Sorin

**Vote: Recommended, 8 in favor, 0 opposed, 1 abstention**

Before a brief break, Wint Aldrich made some concluding remarks saying that was surely a difficult case. He emphasized that the board has to do whatever it can at all times to respect and enforce the wonderful process and system that has come into being since 1966 in identifying resources and encouraging preservation and reuse of those that merit listing. This is a case where the National Park Service has spoken very clearly, our staff has spoken clearly, and a great deal of thought has been put into this. It seems that, in the future, everything that we do could come under a fierce attack by those who don't feel as we do about the built environment and if we can point to examples like this one where the system worked, and a huge amount of time has been devoted to it then it strengthens our case and it will strengthen the case for those who follow us in this important work.

#### *Religious/Civic*

#### **Nomination 11: First Presbyterian Church of Lansingburgh, Troy, Rensselaer County**

Presented by: James Finelli

Discussion: Larry Moss, author of the nomination, former SHPO staffer, and member of the church, pointed out that the facility is a combination of five different buildings and four different styles of architecture. He said that it illustrates the development of a rural area into a busy industrial city.

Motion to approve: Erika Krieger

Second: Wint Aldrich

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

#### **Nomination 12: Schenectady Police Department, Schenectady, Schenectady County**

Presented by: James Finelli

Discussion: none

Motion to approve: Wayne Goodman

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 13: Fairview Cemetery, Naples, Ontario County**

Presented by: Virginia Bartos

Discussion:

Gretchen Sorin asked if this cemetery had a Native American history. Virginia Bartos said that yes, supposedly, but this history has not been sufficiently documented. Gretchen asked if anyone had talked to any Native American communities to find out whether that history is part of their tradition or culture. Virginia answered that that that is a very good question, and more research is needed. She remarked that many of the accounts are second-hand. She looked at a couple of bulletins from the State Museum and it is very vague if there was a Native American village nearby and if this site had been used as a Native American burial site. Gretchen recommended that we speak directly to the Native American community and stressed the need to do this kind of deep research, especially with sites such as this where we are trying to address underrepresented communities. Kathy suggested that we start with Nancy Herter, our Native American liaison, on how best to engage this community on this research.

Wayne Goodman recused himself on this nomination.

Motion to approve: Wint Aldrich

Second: Carol Clark

Abstentions: 0

**Vote: Recommended, 8 in favor, 0 opposed**

**Nomination 14: North Bergen Presbyterian Church, Bergen, Genesee County**

Presented by: Virginia Bartos

Discussion: none

Motion to approve: Wint Aldrich

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

*Mixed Use Commercial/Residential*

**Nomination 15: Buildings on Niagara Street at Fourth Street, Niagara Falls, Niagara County**

Presented by: Jennifer Walkowski

Discussion: none

Motion to approve: Wayne Goodman

Second: Kristin Herron

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 16: Central Naples Historic District, Naples, Ontario County**

Presented by: Virginia Bartos

Discussion: none

Wayne Goodman recused himself on this nomination.

Motion to approve: Carol Clark

Second: Erika Krieger

Abstentions: 0

**Vote: Recommended, 8 in favor, 0 opposed**

*Residential*

**Nomination 17: Naples South Main Historic District, Naples, Ontario County**

Presented by: Virginia Bartos

Discussion: none

Wayne Goodman recused himself on this nomination.

Motion to approve: Carol Clark

Second: Gretchen Sorin

Abstentions: 0

**Vote: Recommended, 8 in favor, 0 opposed**

**Nomination 18: Hall Apartments, Niagara Falls, Niagara County**

Presented by: Jennifer Walkowski

Discussion: none

Motion to approve: Gretchen Sorin

Second: Bryan Erwin

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 19: The Sagamore Apartments and Shops, Niagara Falls, Niagara County**

Presented by: Jennifer Walkowski

Discussion: none

Motion to approve: Wayne Goodman

Second: Kristin Herron

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 20: Mark House, Colonie, Albany County**

Presented by: James Finelli

Discussion: Michael Radlick, president of the Historical Society of the Town of Colonie said that the Mark House is very important to the history of the town and it needs to be preserved as a unique part of the town's history.

Motion to approve: Wint Aldrich

Second: Jennifer Lemak

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 21: Captain Joseph Allen House, Catskill Vicinity, Greene County**

Presented by: James Finelli

Discussion: Architect Clinton Brown spoke on behalf of his client, Michael Ellis, who is a young entrepreneur from New York City who ventured north to buy and restore this building as a short-term rental property. Clinton mentioned that Greg Pinto of his firm prepared the nomination but was unable to attend today's meeting. He thanked SHPO staff James Finelli, Bill Krattinger, and Kath LaFrank for their guidance with the nomination. He also thanked the Vedder Research Library which has, in its records, the Receipt Book of Joseph Allen from the late 18<sup>th</sup> and early 19<sup>th</sup> century. He remarked on how fortunate it is for those in the historic preservation business to get to hold the receipts of the person who built the house you're standing in with notations of the local materials and labor trades people involved in its construction.

Motion to approve: Gretchen Sorin

Second: Carol Clark

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

### **Nomination 22: Gooding Farm, Eagle Bridge, Rensselaer County**

Presented by: James Finelli

Discussion: Owner Brett Walters thanked James Finelli for his help in putting the nomination together and the Hoosick Historical Society for providing lots of documentation on the property. He said that it was an honor for him and his wife, Crystal, to own this property and maintain its heritage.

Motion to approve: Wint Aldrich

Second: Carol Clark

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

### **Nomination 23: Sweet Homestead, Copake, Columbia County**

Presented by: Jennifer Betsworth

Discussion: Owner Catherine Mikic thanked Jennifer Betsworth for her support on the nomination and acknowledged the late historian Ruth Piwonka, who was her early collaborator on this project and who brought deep insight into the history and significance of the Sweet Homestead. She commented that the property was neglected when she purchased it in 2020 for the sole purpose of preserving the Greek Revival farmhouse. During her time researching the property, in addition to understanding its historic context and architectural significance, she discovered the importance of the solar siting of vernacular buildings. She also learned about farm life, social history, and the stories of the four generations of the Sweet and Sherman families that documented the rise and decline of the family farm in very personal terms. She is hoping to preserve and bring new life to the Sweet Homestead and to make the property available for ongoing use and access by the community.

Motion to approve: Kristin Herron

Second: Wint Aldrich

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

### **Nomination 24: Stowell House, Elmira, Chemung County**

Presented by: Daniel Boggs

Discussion: none

Motion to approve: Jennifer Lemak

Second: Carol Clark

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

**Nomination 25: Max and Johanna Fleischmann House, Fleischmanns, Delaware County**

Presented by: Erin Czernecki

Discussion: Owner Leigh Melander thanked Erin Czernecki and Kath LaFrank for their extraordinary work putting the nomination together. Leigh said that she has owned this property for about ten years and brought it back from having not been lived in for twenty years. What she discovered during the process of exploring its history is not only the energies and the ideas and the people that the Fleischmanns brought to the community but also, as Erin mentioned, the later 20th-century piece of history with this community that was coming out of the Holocaust and trying to reinvent themselves. She said that she was struck, as she has been listening with great interest to the other nominations today, by how relevant this still is right now. Fleischmanns as a village is in a moment of real tension between the Hasidic and Orthodox communities who come for the summer months and folks who live here year-round. One of her hopes about this nomination is that it will help everyone to better understand the historic context of the community, how the Hasidic and Orthodox communities came to Fleischmanns, and how the built history matters in this community. Perhaps the nomination will help the community to find some ways to “connect the dots.”

Erika Kreiger commented on how this is not the first Fleischmanns nomination the Board had seen; the Board saw one about a year ago. The Fleischmanns are a significant family and influencer in the state. Gretchen Sorin noted that it is so rare to have a historic mikvah. Following up on Erika’s comment, Erin Czernecki said that it was June 2020 when her very first nomination was the Mountain Athletic Club grounds, which was a ballpark that the Fleischmanns helped create in the village and, yes, they were instrumental in bringing summer resort activity to the village. Erika mentioned that the other nomination the Board approved a while back was for a Fleischmann house in Peekskill that was located near their former manufacturing facility. Gretchen said that so much Jewish culture in the Catskills has been lost, including all the large hotels. She added that the Max and Johanna Fleischmann House in the Catskills is a really important historical and architectural resource. Erika said that it is the fact that the Jewish community was not welcome in places like Saratoga that makes this Catskill property very important. She commented that it is for the same reason that Sharon Springs, for instance, also became popular with the Jewish summer community. Gretchen Sorin added that Jewish people were not welcome in the Adirondacks. Wint Aldrich said that another reason to be grateful for the Fleischmann family is that of the contributions of a later family member, Raoul Fleischmann. He believes that Raoul spent his youthful years in the summer in Fleischmanns and was, for most of its history, the owner of the *New Yorker* magazine. Raoul kept the *New Yorker* intact and free of any ownership involvement in its editorial quality. He was a remarkable person whose philanthropy took a different form.

Motion to approve: Gretchen Sorin

Second: Bryan Erwin

Abstentions: 0

**Vote: Recommended, 9 in favor, 0 opposed**

### **Adjournment**

A motion to adjourn was requested. Gretchen Sorin moved; Carol Clark seconded. The meeting was adjourned at 1:27 p.m.

Minutes prepared and submitted by board secretary Kathy Howe.

### Attachments:

- *Aldrich & Ray Updated Memo from Kath LaFrank to the State Review Board, April 19, 2022*
- *Aldrich & Ray, NPS Denial letter for the Part 1 application, October 12, 2021*





**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

DATE: April 19, 2022

TO: State Review Board

FROM: Kath LaFrank

RE: Aldrich and Ray  
Buffalo, Erie County

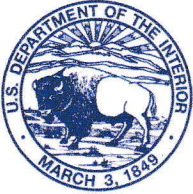
This proposal was scheduled for review at the March meeting; however, it was postponed at the owner's request. It is now scheduled for June, and we are resending the information below for your reference.

We have been asked to bring the proposal to nominate the Aldrich and Ray Building before the SRB, and, after substantial discussion, Daniel has agreed to the owner's request. Although staff opinion on the building's eligibility has not changed, the proposal has gone through a number of procedural steps since the SRB last considered it. Below is a brief summary of all the actions related to this proposal.

1. A proposal to nominate the building was initially brought before the board in 2019. That proposal was thoroughly studied by staff and the SRB; it was rejected due to the building's lack of integrity.
2. The owner appealed the board's rejection to the National Park Service, which, after reviewing the nomination, rejected the appeal. The owner sued NPS and won in the sense that NPS was directed to prepare a more thorough report on why the building did not meet the criteria. The court did not make any comment on the building's eligibility.
3. Before NPS could complete the above task, the original owner withdrew the nomination and hired a new consultant to take over the project. That consultant submitted a revised nomination to the SHPO as a pdil for certification under the federal tax credit program in 2021. The nomination was substantially different from the previous one because it suggested a period of significance *only* from 1888-1893, before the fire of 1893 that destroyed the original Aldrich and Ray Building. SHPO reviewed that draft, finding no credible evidence that the *original* building survived the fire. SHPO staff sent it to NPS outlining those concerns.
4. The request for certification was denied by NPS on October 12, 2021. NPS's letter both rebutted the specific argument that the building had survived the fire and reiterated the reason that the nomination proposal had originally been rejected by both the SRB and the Keeper of the Register: that the surviving

building's significance is related to the *entire* history of the Aldrich and Ray Company at this location and that the surviving fragment lacks the integrity to represent that history. As the NPS pointed out, everything representing the post-fire period of Aldrich and Ray, the period of its greatest success, has been destroyed except for the fragment in question. Roger Reed's letter is attached. It is very thorough in explaining why NPS does not believe that the building is eligible. (see Reed letter, enclosed)

5. A third, slightly revised, draft was submitted by the consultant requesting a hearing by the SRB. This draft still begins the period of significance with the initial construction of the building in 1888. It states that the building "remains fully intact to its period of construction," while also stating that *some* part of it was destroyed and rebuilt after the fire. The SHPO does not believe the claim that the building remains fully intact to its period of construction can be substantiated. In addition, this draft now expands the period of significance to 1953, recognizing that the full history of the company is important, without acknowledging that at least half of the complex that represents the company's operation in the twentieth century no longer survives (the reason that it was rejected by SRB and NPS). We believe that the new proposal is essentially the same nomination that the SRB and NPS rejected in 2019 with the period of significance expanded to include the untenable claim that a substantial portion of the 1888 building survives.
6. The SHPO has devoted substantial staff time to analyzing each of the draft nominations that have been submitted. Despite minor changes in approach, none of the three has presented an argument for significance or an analysis of integrity that documents the surviving building as anything other than a fragment of an important industrial complex. As the SHPO, the SRB, and the NPS have already noted, the surviving building lacks sufficient integrity to represent the history of the Aldrich and Ray Company.



## United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, NW  
Washington, DC 20240

October 12, 2021

Mr. Bobby Corrao  
1485 Niagara St., LLC  
1484-1491 Niagara St.  
Buffalo, NY 14213

**PROPERTY: Aldrich & Ray Manufacturing Company Building, 1491 Niagara St., Buffalo, NY**  
**PROJECT NUMBER: 43682**

**Application: Part 1**  
**Action: Denial**

Dear Mr. Corrao:

The National Park Service has reviewed the Historic Preservation Certification Application -- Part 1 for the property cited above and has determined that the property does not appear to meet the criteria for individual listing in the National Register of Historic Places. This finding is the opinion of this office only and is based on the Part 1 application submitted to this office. Therefore, this property does not presently qualify as a "certified historic structure" for purposes of the Tax Reform Act of 1986, and thus does not qualify for the historic preservation provisions that apply to "certified historic structures."

The Part 1 application for a preliminary determination of individual listing in the National Register is for the property at 1485 Niagara Street, Buffalo, New York, historically known as the Aldrich & Ray Manufacturing Company Building (Subject Property). The subject property is proposed for listing under National Register Criterion A with Industry as the area of significance. The period of significance claimed in association for the subject property begins in 1888, the year the Aldrich & Ray Manufacturing Company built their first brick mill building on the property, and ends in 1893. "The end date for the period of significance is derived from the fullest extent of Aldrich & Ray's designed factory, prior to the fire of 1893."<sup>1</sup> In 1892, during the period of significance, an expansion was made to the rear of the building.

National Register guidelines for listing buildings state that, "Properties listed in the National Register of Historic Places possess historic significance and integrity."<sup>2</sup> More specifically, a property must retain the essential physical features that enable it to convey its historic identity. "The essential physical features are those features that define both why a property is significant (Applicable Criteria and Areas of Significance) and when it was significant (Periods of Significance)."<sup>3</sup> The narrow period of significance called for in the draft nomination for the subject property, 1888-1893, requires that any buildings on the site retain sufficient integrity from within those years and prior to the fire in April 1893.

The historical significance of the Aldrich & Ray Manufacturing Company plant is documented in the

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<sup>1</sup> Draft National Register nomination, "Aldrich & Ray Manufacturing Company," Statement of Significance, Section 8, page 1.

<sup>2</sup> National Register Bulletin, *How to Complete the National Register Registration Form*, 1.

<sup>3</sup> National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, 46.

draft nomination. However, the subject property comprises just one component of what was a factory complex as documented in historic insurance maps, city maps and photographs recorded before and after the proposed period of significance. As the company prospered after the 1893 fire, the factory operations expanded from a three-story story brick building (shown in a 1900 Sanborn Insurance map to incorporate the former police station on the adjacent (north side). The two buildings were linked by a two-story connector elevated above the alley. As the company prospered after the 1893 fire, large storage buildings were added in the rear of the lot, eventually comprising a U-shaped complex. A fourth story was added to the subject property in 1904. Everything that represented the operations of the Aldrich & Ray plant during its post-fire expansion and prosperity has been demolished except for the subject property, alleged by the consultant to be the original Aldrich & Ray factory.

With the loss of approximately half of the historic factory complex that reflected the company's prosperous years of expansion after the 1893 fire, the justification for National Register significance in the application is focused only on the first five years of operation. It is proposed by the applicant that the existing subject property survived the 1893 fire, and thus represents the company in its earliest manifestation. While is not clear that this justification purporting to represent the oldest portion of the building (with a fourth story added in 1904) would be sufficient for National Register eligibility, that justification is dependent upon an argument the very basis of which is called into question by extent of destruction caused by the 1893 fire.

#### Historical Background

Due to the historical circumstances of this property, the fundamental question raised by the applicant and NY SHPO is to what extent the subject property survived a major fire on April 27, 1893. The contemporary newspaper accounts in the *Buffalo Evening News* and *Buffalo Courier* provide clear accounts about the extent of damage. Relevant newspaper excerpts drawn by this reviewer from these accounts are transcribed as follows.<sup>4</sup>

#### *Buffalo Evening News, April 27, 1893*

#### **Aldrich & Ray's Copper Stamping Works Were Destroyed, as Was a Building Occupied as a Boarding House and Salesroom Adjoining**

**The building at 1489 was occupied by Aldrich & Ray as a tin and copper stamping works. It was totally destroyed.**

**The fire first started in the buffing room in a partition dividing the new portion of Aldrich & Ray's factory. There were several lathes in the room and a quantity of cotton packing.**

**There had been a fire there at about 5 o'clock yesterday and it is thought it was not completely distinguished.**

**In less than 15 minutes after the alarm had been sent in the whole building was in flames. The fire spread with frightful rapidity.**

**At 3:50 o'clock a terrible explosion occurred in Aldrich & Ray's factory and flames then spread in every direction.**

**Nothing could save the factory or the Amos salesrooms. They were doomed and are now nothing but a heap of smoldering ruins.**

#### *Buffalo Courier, April 28, 1893*

#### **Destruction of the Aldrich & Ray Company's Property**

**When the walls of the Aldrich & Ray building fell the flames spread to the Peeress Steam Cooker Manufactory at No. 1478 Niagara Street and destroyed it.**

**About an hour after the walls of the first building fell the fire was under control.**

**The Aldrich & Ray building was a four-story brick structure 40 by 200 feet in dimensions. This firm manufactured brass and copper wire, tea kettles, boilers, etc. It lost everything and the loss is estimated at \$90,000 with \$45,000 insurance carried by C. B. Armstrong of the Board of Trade**

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<sup>4</sup> Photocopies of the original newspaper accounts were supplied by the applicant at NPS request.

**building. The Company had orders ahead for six months and will rebuild at once, but will settle temporarily in the Ross Refrigerator Company's building.**

As noted, the police station next door on the north survived the fire, although it was gutted. Contemporary accounts record that the former police station property was sold to Aldrich & Ray in June:

*The Enterprise (Black Rock, NY) July 27, 1893*

**Aldrich & Ray have repaired the building formerly occupied as No. 5 Police Station and connected it with their new building. Taken together they make a fine front, and also a big snap for the firm.**

The newspaper accounts of events are, of course, open to interpretation as no post-fire photographs have come to light. However, the articles are clear that the police station survived, but the buildings to the south, along with the original Aldrich & Ray building (where the fire started and spread) did not.

In supplemental information submitted in support of your application by Heritage Consulting Group,<sup>5</sup> it is claimed that the above newspaper reference to Aldrich & Ray's "new building" is implausible as a new building could have been completed in three months.<sup>6</sup> But the brief newspaper account does not assume completion, only that the walls were up to receive the connector. Including the "repaired" police station, the paper stated, "they make a fine front".

The consultants claim that the 1888 building was not destroyed in the fire, but that the fourth story (evident in the 1889 Sanborn map) is unaccountably missing in Heritage Consulting insistence that the building survived the fire. There is no physical evidence presented that the fourth story alone was removed in 1893 as the building's current fourth story was added in 1904. According to a newspaper account, the new story was added after a fire on the third story causing an estimated \$50,000 damage.<sup>7</sup>

The consultants state that the fact that the factory and police station were separate free-standing buildings as evidence that the factory building was not destroyed in the 1893 fire. The newspaper accounts support the fact that there were two separate free-standing buildings (the factory and the police station), but not that the factory survived the fire.

The consultants point to the finished stone foundation on the north side in the alley as evidence that the factory survived the fire, along with a corbeled brick belt course above the third story. Both architectural details are evidence of construction having been already begun on the factory before the police station was renovated and a connector built. The corbelling was a continuation of the cornice line with the renovated police station with its connector (prior to the addition of the fourth story to the subject property in 1904). The evidence of joist pockets on the north wall is also evidence of two buildings linked by a connector, not necessarily that the 1888 factory survived the fire as claimed in the Part 1 application. The connector had provided the second and third story access between the two buildings. The bricked-in windows on the north elevation (shown in 2017 photographs) were likely filled when the police station became a separate property, or in 1976 when the latter was destroyed. (These windows have since been opened up.)

#### Historical Significance

The consultants make the following claim in the summary statement of significance:

"The subject building remains a clear manifestation of the success of the Aldrich and Ray Manufacturing

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<sup>5</sup> Heritage Consulting Group Transmittal to Roger Reed, August 31, 2021.

<sup>6</sup> The construction of this building, brick exterior walls with scarfed wood beams supported on posts with shouldered capitals, was likely a quick and inexpensive method for erecting a mill.

<sup>7</sup> *Buffalo Courier*, January 16, 1904, p6. Cited in "The Aldrich and Ray Manufacturing Building", section 8, p7, draft NR nomination by KTA Specialists.

Company between 1888-1893, a period in which the company rose to become an industry leader in the manufacture of pressed metal goods.”<sup>8</sup>

Heritage Consulting acknowledges that the existing fourth story was added in 1904.<sup>9</sup> Early photographs after 1904 show a decorative cornice, which has since been removed. However, with or without the cornice, the fourth story is outside the period of significance (as are repairs made following the fire in that year). Windows and doors shown in 2017 photographs are not historic.

Based upon 258 photographs of the property dated May 2017 before renovation work began and supplied by the applicant (required by program guidelines), the interior retained significant elements of the late nineteenth century wooden structural system. The interior of the building is standard late nineteenth century brick mill construction with timber posts supporting principal floor joists, exposed wood floor joists and wood hard pine floors, along with exposed interior brick walls. Staircases were very rudimentary wood of uncertain vintage as were the lifts. Nothing appears to support an argument that the design of the mill is an exceptional representation of a type, period, or method of construction.

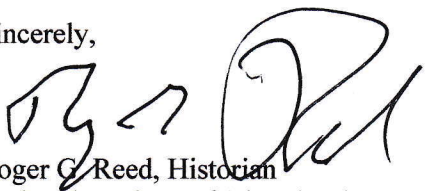
As noted, the period of significance proposed avoids the issue of extensive loss of adjacent buildings that were critical in the operation of the Aldrich & Ray factory during its most prosperous years after the 1893 fire. If, as the draft nomination claims, the company became “an industry leader” this happened in the early twentieth century not in 1888-1893.

The debate over what survived the 1893 fire centers on a building that, at the very least, was gutted. The interior is entirely wood and shows no evidence of fire damage. A narrow interpretation of the 1893 fire damage (treating contemporary newspaper accounts as exaggerations) must still conclude that all wood components were destroyed or damaged beyond salvation. Therefore, the interior reflects the integrity of the factory post-fire (i.e., outside the proposed period of significance). Combined with twentieth century additions and renovations, the building does not appear to retain sufficient integrity for individual listing as proposed.

A denial of preliminary certification of significance cannot be appealed because other administrative options are still available to the owner. Should you wish to pursue the issue of individual National Register listing, your recourse at this point is to the formal Register nomination process (described in the enclosed Department of the Interior regulations, 36 CFR Part 60). Approval by the Keeper of the National Register of a nomination for the property carries with it automatic “certified historic structure” status for the property. You should contact your State Historic Preservation Office for further information.

A copy of this decision will be forwarded to the Internal Revenue Service. If you have any questions regarding the review of your application, please contact the SHPO or me at 202-354-2278 or by email at roger\_reed@nps.com.

Sincerely,



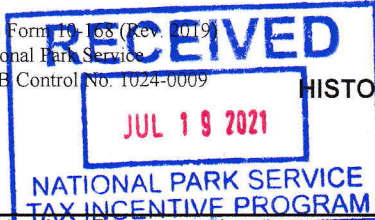
Roger G. Reed, Historian  
National Register of Historic Places

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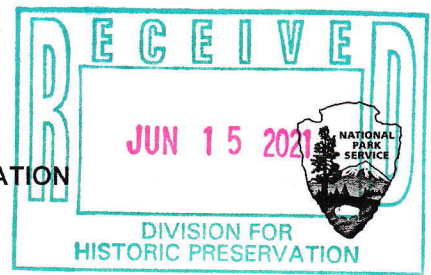
<sup>8</sup> Heritage Consulting Group, “Aldrich & Ray Manufacturing Company Building”, National Register nomination, section 8.

<sup>9</sup> The authors use the term “reconstructed” for the fourth floor, although it clearly post-dated the 1900 Sanborn map.

cc: IRS  
NY SHPO  
Cindy Hamilton, Heritage Consulting Group



HISTORIC PRESERVATION CERTIFICATION APPLICATION  
PART 1 - EVALUATION OF SIGNIFICANCE



Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

NPS Project Number  
43682

1. **Historic Property Name** Aldrich & Ray Manufacturing Company Building

Street 1491 Niagara Street

City Buffalo County Erie State NY Zip 14213-1103

Name of Historic District or National Register property \_\_\_\_\_

- National Register district
- certified state or local district
- potential district
- National Register property

2. **Nature of Request** (check only one box)

- certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation purposes.
- certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.
- certification that the building does not contribute to the significance of the above-named district or National Register property.
- preliminary determination for individual listing in the National Register.
- preliminary determination that a building located within a potential historic district contributes to the significance of the district.
- preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. **Project Contact** (if different from applicant)

Name Cindy Hamilton Company Heritage Consulting Group

Street 15 W. Highland Ave. City Philadelphia State PA

Zip 19118 Telephone (215) 248-1260 Email Address chamilton@heritage-consulting.com

4. **Applicant**

I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable]:

- I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or
- if I am not the fee simple owner of the above described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011).

For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.

Name Bobby Corrao Signature (Sign in ink) [Signature] Date 6/7/2021

Applicant Entity 1485 Niagara St, LLC SSN \_\_\_\_\_ or TIN 82-0776495

Street 1485-1491 Niagara Street City Buffalo State NY

Zip 14213 Telephone (716) 580-3318 Email Address bcorrao@nataledevelopment.com

**NPS Official Use Only**

The National Park Service has reviewed the Historic Preservation Certification Application - Part 1 for the above-named property and has determined that the property:

- contributes to the significance of the above-named district or National Register property and is a "certified historic structure" for rehabilitation purposes.
- contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes.
- does not contribute to the significance of the above-named district or National Register property.

**Preliminary Determinations:**

- appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
- does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
- appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
- appears to contribute to the significance of a registered historic district if the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS is expanded by the State Historic Preservation Officer.
- does not appear to qualify as a certified historic structure.

Date 6/13/21 National Park Service Authorized Signature (Sign in ink) [Signature]

NPS Comments Attached