



Alternatives Analysis Outline for Protecting Buildings

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Consideration of alternatives should always be a part of project planning. However, documentation of that consideration in accordance with this outline is only necessary when requested by the Historic Preservation Office as part of a specific regulatory process.

An **alternatives analysis** is a process through which alternatives for developing a historic building or site are explored, and the benefits and losses of each alternative assessed, for the purpose of analyzing a prudent and feasible alternative that will avoid or minimize the adverse effect to a historic resource.

A good alternatives analysis steps back from a project to gain critical perspective. The analysis benefits the applicant by helping them thoroughly consider all aspects of project planning. Any potentially impacted historic resources can also benefit from the analysis for the same reasons.

The Historic Preservation Office may request an alternatives analysis as part of the following review processes if a project does not conform with the *Secretary of Interior's Standards for the Treatment of Historic Properties*:

- Section 106 of the National Historic Preservation Act
- New Jersey Register of Historic Places Act
- State of New Jersey Executive Order 215
- Land Use Regulation permits (Coastal Areas Facility Review Act, Fresh Water Wetlands, Highlands, and Waterfront Development)

There are sometimes differences in the goals between a public project and a privately funded project and in the kinds of analysis that may be appropriate. By nature, a private project has a limited number of constituencies. Maximizing economic return, location, program goals, community presence and design excellence are some of the most common considerations in developing a private project.

Although many of the goals of a public project may be the same as those of a private project, public projects have larger constituencies by nature and tend to include consideration of maximizing open space, recreation and historic preservation. Some of the investigations requested below may have been compiled to make the decision to implement a project.

Please note that every project is different; certain sections of this outline may not be relevant to your specific project. In those cases, please address those sections as non-applicable. If the information was already submitted to the HPO, please attach a copy to create a complete document.

Report Outline

I. Introduction to the Project

A. Identify the regulatory action triggering the need for an alternatives analysis.

1. Is the project a public or a private undertaking?
2. What are the funding sources?
3. Who is the owner?
4. What if any permits are needed?
5. Who is the lead agency for the regulatory review?

B. Project location map including all built structures and landscapes, with known historic resources identified.

C. Resource information:

1. Statement of historical significance
2. Physical description of the subject property, including character-defining features
3. Boundary of the historic district or site, physical description of the subject property

D. Photographic Documentation should include:

1. Contextual photographs illustrating the relationship of the resource to the character of its surrounding area
2. Sharp clear images which convey the character and significance of the resource, as well as details, such as materials and craftsmanship

E. Description of Proposed Project.

F. Statement of project needs/objectives:

1. Private projects (privately owned projects with no public funding): when use does not accommodate the resource type, explain why the resource could not be integrated into or within the site plan.
2. Public projects (public ownership or use, such as libraries, government buildings, etc., with or without public funding): have other locations been sought which would better accommodate the project need/objectives?

G. Summary of redevelopment scenarios explored for project property. Please note preferred alternative.

H. Describe how the proposed project meets:

1. The local master plan and zoning requirements
2. Local development trends

II. Site Condition and Design

A. For publicly initiated or funded projects: evaluation of alternative sites, programs and/or buildings more appropriate for the proposed project must be included in the analysis.

B. A narrative summary of one of the fully examined alternatives must include the adaptive reuse of the historic building in accordance with the *Secretary of Interior's Standards for*

*Rehabilitation.*¹ Design alternatives must explore the potential for adding floors, additions or interior alterations that might be viable while retaining the character defining features of the historic property.

- C. Where complete demolition is proposed for any reason, an existing conditions assessment prepared by an architect or structural engineer who meets the National Park Service's minimum standards for a historic preservation specialist in the architecture or structural engineering field must be submitted. The assessment must include:
 - 1. A narrative summary of recommendations in order of feasibility
 - 2. Evaluation of the architectural and structural features of the exterior and interior as well as all the environmental systems of the property
 - 3. Annotated architectural drawings and existing condition photographs of the primary building, outbuildings (if applicable), site or landscape (if applicable)
- D. Describe the site conditions and illustrate the status of the project site. Identify any conditions at the site that may impact the project, such as the presence of wetlands or open water, archaeological resources, access/egress issues, soil conditions, etc.

III. Zoning or Building Code Constraints

- A. Code constraints limiting adaptive reuse must be documented using the specific code citation and description, fully detailing the way in which the building fails to adhere to code requirements. The only current building code required for existing buildings in New Jersey is the Rehabilitation Subcode.²
- B. Along with the code citation, a detailed analysis of work that is required to comply with the code and a cost estimate for this work must be submitted. Technical assistance is available through the Department of Community Affairs Division of Codes and Standards.
- C. If a local zoning variance is needed to facilitate adaptive reuse, this requirement should be discussed in the analysis.

IV. Development of Alternatives

- A. A reasonable number of prudent and feasible alternatives, even those which may compromise project objectives, should be fully described and evaluated with regard to their impact upon the identified historic resource. The analysis should constructively evaluate factors such as local jobs generated, business creation, property tax stabilization or enhancement and other economic activity that may or may not result in a rehabilitation project versus a new construction project. Assessment should also include the benefits of cultural and heritage tourism and how those historic resources can enhance profitability. The analysis of alternatives should be sufficiently detailed and rigorous to permit independent comparative evaluation of the benefits, costs and environmental risks of the proposed project and each reasonable alternative.
 - 1. For private projects, the alternatives shall provide a full understanding of the economic parameters that would prohibit the owner from realizing a return on investment in the historic property while keeping it in its historic use versus its proposed use or rehabilitating the site for a new use. The return does not necessarily have to be calculated based on

¹ National Park Service. *The Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation as a Treatment and Standards for Rehabilitation*. <https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm>

² NJ Department of Community Affairs. *Rehabilitation Subcode*. <https://www.nj.gov/dca/divisions/codes/offices/rehab.html>

the highest economic return. The new use may or may not be the same as the goals and objectives of the project. For example, if a historic farmstead complete with farmhouse and outbuildings has been purchased with the intent of developing a strip mall. Could it be adaptively reused keeping the site and buildings intact and placing some of the strip mall businesses (such as a card shop, bank, hair salon, etc.) within the farm buildings? Can the farmstead remain as a viable working farm? Could the farm and its buildings be best used to serve another purpose such as a bed & breakfast, antique shops and café?

2. For public projects (as defined under I.F.2, p.2) each alternative shall be substantiated by economic data.

3. Economic data shall also include the sale of surplus property where applicable.

B. It is recommended that alternatives include consideration of financial benefits such as easements, investment tax credits and transfer of development rights in the analysis. Attached is a list of additional sources of funding and/or financial incentives that may make the rehabilitation of a historic property feasible.

V. Summary of Findings and Conclusion

Provide a narrative summary of the preferred alternative and full justification for its selection.

VI. Appendixes

A. Vitae of persons involved in preparing the report.

B. All letters from code officials or others with jurisdiction in which they have presented a position or recommendation on the project.

C. All comments received from interested parties including municipal historic preservation commissions, historical societies and/or organizations that have a statewide interest in the protection and preservation of cultural resources.

List of Funding and/or Financial Incentives for Historic Preservation Projects

Federal Tax Credits for Adaptive Reuse Projects

The Federal Historic Rehabilitation Tax Credit

The Historic Preservation Office's overview of the federal program.

<https://dep.nj.gov/hpo/topics/economic/tax/>

The New Market Tax Credit or the Bank of America Historic Tax Credit Fund

Administered through the National Trust for Historic Preservation.

<https://savingplaces.org/historic-tax-credits>

Non-Profit Projects

Public or private non-profit projects may be eligible to apply for funding from the following:

The New Jersey Historic Trust

<https://www.nj.gov/dca/njht/>

Candid Foundation Directory (formerly The Foundation Center)

A funding guide that can be searched using various key words such as "historic preservation", "cultural tourism", etc.

<https://fconline.foundationcenter.org>

Housing

Financial assistance for low- and moderate-income housing may be obtained through:

New Jersey Department of Community Affairs

<https://www.nj.gov/dca/>

New Jersey Housing Mortgage Finance Agency

<https://nj.gov/dca/hmfa/>

Energy Efficiency Programs

<https://nj.pseg.com/saveenergyandmoney/energysavingpage/energyefficiency>



NJ Historic Preservation Office

Community Investment & Economic Revitalization,
New Jersey Department of Environmental Protection
dep.nj.gov/hpo

Mail Code 501-04B, NJ Historic Preservation Office, P.O. Box 420, Trenton, New Jersey 08625-0420

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