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Maryland Senate  
James Senate Office Building  
11 Bladen Street  
Annapolis, Maryland 21401

Maryland House of Delegates  
House Office Building  
6 Bladen Street  
Annapolis, Maryland 21401

Dear Honorable Members of the Frederick County Delegation:

The Frederick Preservation Trust (FPT) requests that you consider the historical significance of the proposed downtown hotel and convention center site as you determine whether to provide funding for this public/private enterprise. It is our understanding that the City of Frederick has requested \$15 million in bonds from the Maryland Stadium Authority (MSA), and the Frederick County Delegation will decide on February 5 if it supports the proposal. Please consider:

The former *Frederick News-Post* (FNP) site has been selected by the City of Frederick's Downtown Hotel Advisory Team as the location for a downtown hotel and conference center project (Project). The FNP site contains significant historic resources that are threatened by the Project, including the former trolley building that served the Frederick and Middletown Railway and the Birely Tannery. Preliminary plans have indicated partial demolition of the former trolley building and total demolition of the Birely Tannery building, located along Carroll Creek.

The Birely Tannery is within the local Frederick Town Historic District. It is listed in the National Register of Historic Places by virtue of its location in the Frederick Historic District. Of significant note, in 2014, Preservation Maryland identified the Birely Tannery as one of Maryland's most endangered historic properties on its annual Endangered Maryland list, <http://endangeredmaryland.org/site.php?4>. Also of note, the Birely Tannery is believed to be the last remnant in the City of Frederick related to the tanning process that occurred at the site until 1924, representing an industry that was pivotal to our local, state, and national economies. In 1991, the site underwent a Phase III archaeology data recovery, due to the proposed construction of a flood control project. The site has been determined eligible for the National Register because of its archeological significance.



The historic FNP site and its buildings are protected by their location in the Frederick Town Historic District. We have concerns that the Frederick County Delegation would request \$15 million in funding from the MSA when those protections have not yet been challenged before the City's Historic Preservation Commission. It is unclear whether the Project as preliminarily proposed by the City's Department of Economic Development and Hotel Advisory Team would survive review of the City's Historic Preservation Commission and Planning Commission, especially when historically significant structures like the Birely Tannery have been proposed for complete demolition. Otherwise, providing funding for the Project prior to the administrative process may communicate to the residents and business owners of Frederick that their elected legislators will rubber-stamp projects of this magnitude that benefit only a few, or that economic development projects in the City are exempted from established processes.

Since the inception of the Project, we have encouraged the City's Department of Economic Development and the Hotel Advisory Team to consider historic equities and the impact that the Project would have on these important factors, including, but not limited to, the massing, scale, and size of the proposed hotel and conference center along with consideration of surrounding historic buildings, streetscapes and viewsheds, especially of the City's iconic spires. Accordingly, nearly three years ago, we recommended to the City's Department of Economic Development that the Hotel Advisory Team include a representative of the historic preservation community, whether a City Preservation Planner or a member of our group, as the composition of the Hotel Advisory Team only consists of those with an economic or business interest. Despite the city's decision to exclude preservationists, the Frederick Preservation Trust has submitted comments about site selection and the adaptive re-use of any historic properties impacted by the proposed development. We cautioned that the Birely Tannery site was, in our opinion, the location that would have the most devastating impact on the historic district among those being considered.

The development of a downtown hotel and conference center will have a lasting impact on the City of Frederick, especially its historic skyline and streetscape. Please table any efforts to fund the Project with MSA bonds until the research on the property's history, environmental quality, and impact are completed, and the Project has been properly vetted by the City of Frederick's appropriate Commissions.

Sincerely,

*Anthony S. Moscato, Jr.* [email signature]

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cc: City of Frederick Mayor & Board of Aldermen; Office of Frederick County Executive