



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Gettysburg National Military Park
1195 Baltimore Pike
Gettysburg, Pennsylvania 17325



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Andrea MacDonald, Bureau Director / Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission
State Historic Preservation Office
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120-0093

Subject: Adverse Effect Determination for the Demolition of Structures at the Wright and Bishop Sites
Gettysburg National Military Park – Section 106 Consultation (ER Project #2025PR00966.001)

Dear Ms. MacDonald:

We are writing to continue Section 106 consultation regarding the demolition of structures at the Wright and Bishop Farm sites at Gettysburg National Military Park. We thank you for your patience as we return to normal operations following a lengthy government shutdown. This letter follows a determination of adverse effect letter sent to consulting parties at the beginning of August. In response to that letter, we received a partnership proposal from Historic Gettysburg Adams County (HGAC) for preservation of the Bishop Barn and a request from your office, dated August 18th, 2025, for a consultation meeting to discuss the (HGAC) proposal as an alternative treatment for the Bishop Barn. With this letter, we are following up on the consultation meeting that was held on August 27th, 2025, at the Park and on HGAC's revised partnership proposal that was prepared after that meeting. A summary of the meeting discussion was distributed to consulting parties via email and is enclosed here. We conclude this letter with an updated determination of adverse effect.

We greatly appreciate the time and attention dedicated to this consultation by all parties. We are especially grateful for the time taken by HGAC to draft an initial partnership proposal, followed by the revised proposal as a follow-up to the August 27th consultation meeting, received on September 18th, 2025. HGAC also sent a follow-up letter, received on September 29th, reinforcing their interest in a partnership that includes the Bishop Barn as well other properties in the Park. HGAC has shared these documents with your office as well.

Based on all feedback received thus far, including discussions at the consultation meeting and the needs of the Park to focus limited resources on high priority structures and promote sustainability, we have now considered a total of five alternative treatments for the Bishop Barn. The first four were included in our previous letter but a fifth alternative is included here. This alternative was shared in the meeting summary distributed via email after the August 27th meeting. Our assessment of each alternative is outlined below. Please note that, as a result of our recent deliberations over the alternatives, we have decided to focus on full removal of the Bishop barn, to include the stone foundation and earthen bank.

After the consulting party meeting, the Park consulted with historians and park interpreters to better understand the potential that the barn foundation and earthen bank would provide to the visitor's understanding of the battle action on the South Cavalry field. The feedback indicated that these post-battle remnants would not provide critical context for a battle narrative and could even potentially be confusing to the visitor. Additionally, significant maintenance and repair or stabilization would likely be required for these features in the future.

Alternatives for the Bishop Barn

1. The removal of additions and the preservation of the Barn's historic (1884) core, which could be accomplished by one of two means: the National Park Service (NPS) using Legacy Restoration Fund (LRF) money or a partnership with HGAC to rehabilitate and maintain the historic core.

The Park has considered the use of LRF funding for preservation of the historic core of Bishop Barn. For several reasons, outlined below, we have decided not to obligate funding for preservation of this particular structure:

- The barn's lesser significance relative to other similar structures in the Park. The Bishop Barn is a placeholder for a battle-era structure about which very little is known. Exhaustive research has revealed minimal information about the battle-era structures that stood at this site. Additionally, the barn is in an area of minor battle action compared to numerous other historic barns in the Park that are also in need of investment for repairs and long-term maintenance and that are located in major battle action areas.
- The barn is in an area of the park that is not easily accessed by the visitor via a commemorative avenue or trail. Its visibility and accessibility are limited compared to the 19 historic barns and other outbuildings in the Park, e.g. wagon sheds, carriage houses.
- While the barn's core retains a high degree of historical integrity, there are several structural issues identified in the Historic Structure Assessment Report (HSAR) that would need to be addressed for long-term preservation. These include a significantly compromised western wagon shed where failing posts and footers have led to displaced joists and unstable walls. Cribbing was installed ca. 2017 to help stabilize this section of the barn, but the foundation and lower walls need to be rebuilt for long-term preservation. Other serious structural issues include a rotten post on the upper floor of the barn's northeast corner as well as some wall siding requirements. Numerous structural problems were identified with the out-shed granary, which has deteriorated to the point where preservation would no longer be practical. A 2017 cost estimate for repairs and stabilization to address only serious deficiency issues totaled over \$296,000. The cost today to address significant deficiencies and other needed long-term maintenance would be appreciably higher and would only be a start to further needed rehabilitation. For comparison, recent estimates for rehabilitation of other barns in the Park, barns that are in better condition than Bishop, easily exceed one million dollars.

The Park has also considered the HGAC proposal to rehabilitate and maintain the historic core over a 20-year period. While we certainly appreciate the generous proposal, we have decided not to pursue the partnership as currently framed for several reasons.

- As noted above, the Bishop Barn is less significant and in a less accessible portion of the Park.
- While a partnership would leverage the resources of the partner, it is nonetheless an investment in long-term preservation and maintenance. The Park's focus on any such investment must be on structures that are considered higher priority. These include barns in major battle action areas that

are associated with intact battle-era farmstead clusters and are that high visibility for visitors taking advantage of Park avenues and trails.

- Even a donor-funded rehabilitation would create a management obligation and some degree of financial/operational requirement for the Park. Again, our preference is to focus such efforts on other historic structures that are of greater significance and accessibility. Use of LRF for removal of the barn frees the Park of substantial long-term maintenance at this location.
- There is concern that a project of this scope could create a long-term financial burden for HGAC. While the organization offers grants to local barn owners, these are relatively modest compared to the considerable amount of funding, e.g. hundreds of thousands of dollars, that would be necessary for demolition of non-historic additions and repair and maintenance at Bishop. Additionally, it is unclear whether Bishop would qualify for a HGAC grant or a grant requested on their behalf since the barn is not on the HGAC Barn Registry, it is not private property, and it is not a pre-Civil War structure.
- If the Park were to remove the Bishop Barn from the LRF project, it would result in permanent loss of eligibility for this funding source for removal of the structure. Should HGAC be unable to complete partial demolition, rehabilitation and maintenance, the Park would not have access to LRF and the barn would likely fail to compete for future funding given its relatively low significance level.
- Under a Philanthropic Partnership Agreement, any work done by HGAC would get donated to the NPS at the conclusion of the project (rehabilitation) and NPS would be responsible for the care and maintenance of this structure in perpetuity. Per NPS policy, HGAC would be required to provide an endowment to NPS upon completion of the project to provide for its care in the future. Such an endowment may be financially burdensome to HGAC.
- Since the estimated cost of this project would likely exceed \$500,000, the HGAC proposal would require not only a Philanthropic Partnership Agreement but also a Partnership Design and Construction Agreement which requires HGAC to carry \$5 million in liability insurance.
- The NPS may only accept the services offered by HGAC via the NPS Volunteer-In-Parks program. All HGAC volunteer staff, volunteer artisans, and youth volunteers would be required to be signed up as an NPS volunteer. This would make NPS liable for injuries and NPS staff would be required to provide supervisory staff during the course of the project. This would present a staffing requirement that the Park cannot meet with current staff levels.

2. Full demolition of the barn, with re-grading to pre-development conditions (Preferred).

This alternative involves the complete removal of all above-ground evidence of the existing structures at the Bishop Farm site. The battlefield landscape arrangement at the site includes contributing elements to the National Register districts, specifically agricultural fields and an adjacent woodlot. The 19th century farmstead cluster of structures stood roughly central to the fields. Full demolition and regrading would create an open field setting with existing topographic contours as guidelines for grading. Grading would be accomplished through deposition of fill where necessary and not by cutting or excavation.

3. Partial demolition of the barn, retaining the fieldstone foundation and earthen banked barn entrance for interpretive purposes.

The above-ground framing structure of the barn would be removed. The entire upper level as well as most of the lower would be demolished. The three fieldstone foundation walls and the earthen embankment would be preserved as structural ruins. This plan was emphasized as a preferred course of action in previous consultation. However, as noted above, we have decided that the preservation of structural ruins would create an additional maintenance requirement and potential public safety issues,

while providing limited interpretive value. We believe that future interpretation of the farm site with respect to the battle can be accomplished with the preserved agrarian landscape setting.

4. Leave the barn to deteriorate in place with exclusion fences and signage for safety (also known as demolition by neglect).

Demolition by neglect is discouraged by the Advisory Council on Historic Preservation and constitutes an adverse effect under federal regulations--36 CFR 800.5(a)(2)(vi). In addition, the continued deterioration of the barn would result in a safety hazard for park employees and the public.

5. Relocation of the Bishop Barn.

This alternative was added for consideration immediately after the consultation meeting on August 27th. NPS and HGAC would identify the portions of the barn that represent the historic core and non-historic additions necessary for stability. We would also identify portions of the foundation needing to remain in place to promote interpretation of its presence on the landscape. The remaining sections of the barn and the home would be demolished by NPS. HGAC would remove and reconstruct the historic core of the barn outside the park boundary at a location of their choosing and demolish the remaining non-historic additions left for stabilization during relocation. NPS would cover the cost of fencing for a two-year period while the barn was being disassembled and removed.

This alternative was presented to HGAC via email immediately after the August 27th consultation meeting. As this alternative was not addressed in the revised HGAC proposal, we assume there is no interest in pursuing relocation of the barn.

Summary of Findings

We have carefully considered the alternative treatments summarized above for the Bishop Barn. We are especially appreciative of the consulting party input and the partnership proposal offered by HGAC. As we believe it is our responsibility to focus our current and future investments, including resources, funding, personnel and partnerships, on the most historically significant and accessible properties on the battlefield, we have decided to commit to the preferred alternative as outlined above (Full demolition). This will allow us to maximize LRF to address deferred maintenance at the highest priority sites in the Park. While the house and barn structures will be completely removed from the Bishop Site, other landscape features and significant archaeological deposits will be preserved.

While we cannot preserve the Bishop Barn, we would welcome future collaboration with HGAC on the preservation of other historic structures in the Park. Such a collaboration would be separate from this consultation. We do not believe that another consultation meeting on this topic is necessary as we have thoroughly considered the alternatives as outlined above.

Determination of Effect

In accordance with 36 CFR § 800.5(a), the removal of the Bishop Farmstead house and barn constitutes an Adverse Effect to historic properties due to the direct loss of contributing elements to the Gettysburg National Military Park Historic District and Gettysburg Battlefield Historic District. With respect to both the Bishop and Wright Farm sites, archaeological resources will not be adversely affected at either site. Cultural landscapes at both sites likewise will not be adversely affected. The Wright House and Barn are not historic properties.

Next Steps – Resolution of Adverse Effects

If you concur with our determination of Adverse Effect, the NPS proposes to enter into consultation with your office and other consulting parties to develop a Memorandum of Agreement (MOA) to resolve the adverse effect, per 36 CFR § 800.6(c).

We look forward to working with your office and consulting parties to resolve the adverse effect in a manner that promotes stewardship and interpretation of Gettysburg's historic landscape. Please contact Jeff Irwin, Cultural Resource Program Manager, at (717) 339-8560 or jeffrey_irwin@nps.gov with any questions or comments.

Sincerely,

Kristina Heister
Superintendent
Gettysburg National Military Park

Enclosures

- Summary of 8/27/2025 Consultation Meeting