



United States Department of the Interior

NATIONAL PARK SERVICE
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22172

(703) 221-4706
FAX (703) 221-4322

L7617 (PRWI)
January 9, 2012

Ms. Kathleen Kilpatrick,
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

ATTN: Ethel Eaton
Subject: Compliance with Section 106 of the National Historic Preservation Act

Dear Ms. Kilpatrick,

Prince William Forest Park seeks concurrence on the use of a substitute material roofing shingle in lieu of asphalt for application on all structures constructed by the Civilian Conservation Corps (CCC) from 1936-1941. Prince William Forest Park (formerly Chopawamsic Recreational Demonstration Area) was developed in 1936 to provide recreational cabin camping experiences for nearby urban populations. The cabin camps and associated structures were designed by NPS architects and serve as unique examples of the historic landscape design of the National Park Service and Emergency Conservation Works (ECW) architecture. At Prince William Forest Park, the Civilian Conservation Corps members constructed over 200 structures. While some structures have been removed or altered over time, 170 structures are listed as contributing to the district and are on the List of Classified Structures (LCS). The Park continues to maintain and repair these structures and their cultural landscapes.

Originally, wood shake shingles were installed on all cabin structures by the Civilian Conservation Corps. Local cedar, pine, or oak were sawed or hewn into 24 or 26 inch shingles. These wood shingles were replaced by the Office of Strategic Services (OSS) in effort to "winterize" the structures beginning in 1942. The wood shakes were removed and replaced with "mottled grey" asbestos asphalt shingles. With the ban of asbestos shingles beginning in the 1970s, the park began to apply a variety of asphalt shingles. Roll-over, tarp, and three-tab asphalt shingles of maroon, green, black, or grey coloration were installed during this time. In the 1980s the park shifted towards the use of three-tab oak colored asphalt shingles in effort to provide the impression of a new wood shake shingle. In 2004, installation of architectural oak colored shingles began. The architectural or dimensional shingles are asphalt shingles with a three-dimensional appearance. They were selected in an effort to return to the character of the original wood shake shingles. The architectural shingles were last installed in 2010, and are no longer in use as they have been determined as inappropriate. Currently, three-tab asphalt in black, grey, green, and oak colors exist in the park, as well as oak colored architectural shingles.

In December 2009, after the use of architectural shingles was deemed inappropriate by the National Capital Region (NCR) Historical Architect, the park began to conduct research to find a more appropriate roofing material. Park staff conducted research on the chronology of roofing materials used on the cabin camp structures; researched various wood shake, asphalt, and substitute roofing materials; conducted site visits to view substitute roofing materials; and completed mock-ups of selected roofing materials. The park has consulted with the NPS National Capital Region office and Washington Office (WASO) Technical Preservation Services (TPS) branch with each step in this process. A detailed chronology of park scoping efforts is enclosed with this letter.

Present documentation of the cabin camps consists of National Register nominations for ECW architecture, as well as other documents related to the context of the CCC activity. More recently, an update on the National Register nomination was completed. This nomination not only updated information from the existing nominations, but expanded the themes of significance to nominate Prince William Forest Park as a Historic District. The park concluded a Cultural Landscape Inventory (CLI) and HABS/HAER documentation is currently underway in Cabin Camp 1. The park is diligently working towards expanding and improving the documentation of its historic resources. These studies have provided the park with increased information on the design and landscapes present in the cabin camps. However, design guidelines, treatment plans, or historic structure reports for any cabin camp or accompanying structures do not currently exist.

In addition to continued documentation, the park is also pursuing legislative and management actions to highlight the story of the Recreational Demonstration Area (RDA) history. Currently, the park is preparing legislation for a name change to Chopawamsic CCC National Recreation Area in effort to highlight the unique story of the Recreational Demonstration Area. With a renewed focus on telling the RDA theme, the park hopes to engage park visitors in a landscape where the legacy of the RDA can still be captured in the ECW architecture.

After thoroughly examining alternatives and assessing potential issues, the park, NCR, and WASO staff prefer a composite shingle material resembling cedar shakes for the use on CCC era structures. The continuation of three-tab asphalt shingle was considered, but dismissed due to its inability to match the characteristics of wood shake. The attached documentation provides further details on other materials considered during the process and reasons for dismissal.

In an effort to achieve the previously mentioned goals, the park proposes to replace all deteriorated roofing systems that fall within the 1936-1941 CCC construction era with a composite roofing shingle that matches the visual qualities of cedar shake. The shingle is manufactured by Enviroshake Quality Engineered Roofing, which has been in business since 1998. The product is composed of 95% recycled materials, including a mixture of postindustrial plastic, recycled rubber, elastomers, and natural wood fibers. Upon installation the shingle is dark grey and weathers to a silvery grey within 3-9 months. The product has a lifetime warranty and is fully transferable for up to 50 years. The shingles are installed in the same manner as actual wood shake shingles. The Enviroshake shingles are the park's preferred shingle alternative because of their resemblance to cedar shake, life expectancy, recycled content, installation method, maintenance, and cost. By selecting a substitute shingle that most closely resembles wood shake, the park remains in accordance with *The Secretary of Interior's Standards for Rehabilitation* to match the visual qualities of the character defining features. Standard 6 states, "Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design,

color, and texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Further, Preservation Brief #16 states, *"In limited circumstances substitute materials that imitate historic materials may be used if the appearance and properties of the historic materials can be matched closely and no damage to the remaining historic fabric will result."* The proposed use of Enviroshake would closely match the appearance of actual wood shake.

The structures that would be affected by this action are those listed as contributing to the National Register of Historic Places in Cabin Camps 1,2,3,4, and 5. These structures would not include buildings constructed by the OSS or later structures. Roofing systems are replaced on historic structures on a cyclic basis. During the 2012 fiscal year, the Central Bath unit in Cabin Camp 4 is in need of a new roof system. This would be the first structure affected by this decision.

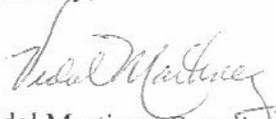
The park proposes to take action in effort to return to a more appropriate roofing shingle that maintains the character of the ECW style architecture present in the campgrounds, as well as to provide for the long-term preservation of the structures. The sustainable roofing shingles would also assist the park in lowering its carbon footprint. Further, the park acts in accordance with the National Park Service "Call to Action" which challenges parks to find ways to introduce sustainability in historic preservation methods.

When complete, this project would bring a more appropriate roofing shingle appearance to the historic structures at Prince William Forest Park. Work would be carried out by NPS staff beginning in 2012 and be completed on an as needed basis.

NPS cultural resource advisors at the National Capital Region determined a No Adverse Effect, Standard 4-step Process.

We request your concurrence that the above actions do not represent an adverse effect. If you have questions or concerns about this project, please do not hesitate to contact me at (703)221-3366 (email Vidal_Martinez@nps.gov) or Paul Petersen, Chief of Resource Management at (703)221-3329 (email Paul_E_Petersen@nps.gov).

Sincerely,



Vidal Martinez, Superintendent
Prince William Forest Park
18100 Park Headquarters Rd
Triangle, VA 22172

I concur that the above-described project will not have an adverse effect on historic properties located within Prince William Forest Park, National Park Service.

State Historic Preservation Officer

Date

Attachments

cc: Perry Wheelock, Associate Regional Director for Resource Stewardship and Science: National Capital Region, National Park Service



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

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February 8, 2012

Vidal Martinez, Superintendent
Prince William Forest Park
18100 Park Headquarters Road
Triangle, Virginia 22172-1644

RE: PEPC Project No. 40128
Installation of a Substitute Material Shingle on CCC-era structures
Prince William County, Virginia
DHR File No. 2012-3625

Dear Mr. Martinez:

Thank you for your letter of January 9, 2012 requesting our concurrence with your determination that the use of substitute material roofing shingle in lieu of asphalt for application on all structures constructed by the Civilian Conservation Corps (CCC) from 1936-1941 does not represent an adverse effect. I regret to inform you that we cannot concur with your determination. In our opinion the use of substitute materials on CCC-era structures at the Park does not meet the Secretary of Interior's *Standards for the Treatment of Historic Properties* nor do we find it consistent with the National Park Services' own policies. Accordingly, we must recommend a finding of adverse effect. More detailed comments follow.

Let me begin by assuring you that we understand and are sympathetic to the economic challenges faced by Prince William Forest Park in maintaining and preserving over 200 historic structures. The scoping chronology accompanying your letter makes it clear that the Park in consultation with Regional and Washington level staff has given careful consideration to the replacement of all deteriorated roofing systems since late 2009. We have reviewed the current and historic conditions of the roofing material found at the CCC-era cabins. Historically, wood shingle roofs were present, which were replaced with asphalt shingle roofing that currently exists. The Park's preferred Enviroshake simulated wood shingle roofing is intended to replicate the appearance of the historic wood shingle roof. We cannot, however, agree that by selecting a substitute shingle that most closely resembles wood shake, the selection is in accordance with the *Standards* by matching the visual qualities of the character defining features. *Standard 6* states: *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical or pictorial evidence* (emphasis ours). Your letter acknowledges that it is possible to repair the roofs with wood shakes or with asphalt shingles.

In addition *Preservation Brief 16: Use of Substitute Materials on Historic Building Exteriors* sets out four criteria for use of substitute materials:

1. The historic building material is no longer available;

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Fax: (804) 862-6196

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Tidewater Region Office
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Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5428
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
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Stephens City, VA 22655
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2. The historic building materials is inherently flawed (e.g. Aquia Stone);
3. The craftsmanship to work the historic material is no longer available; and/or
4. The substitute material is required by code.

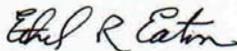
Preservation Brief 16 also allows for limited use of substitute materials when the architectural feature is not highly visible, such as placed high on a building.

Using the National Park Service's own guidance, we find that the existing asphalt roof could be replaced in-kind, or a wood shingle roof could be installed, based on documentation that this condition existed historically. Both historic building materials are available, neither is inherently flawed, repair does not require extraordinary craftsmanship nor is a substitute material required by code. It is acknowledged that the roofs are highly visible. Moreover, we cannot agree that it is appropriate to apply the argument of "in limited circumstances" to the Park's decision that the return to cedar shake is economically prohibitive because of the cost of the materials and the frequency in which they need to be replaced. It has been our experience in working with the Technical Preservation Services Branch on a number of occasions that applications for tax credit are denied when the applicant pleads cost and requests relief from the *Standards*. While we are sympathetic to the Park's position, we must point out the necessity of the Park Service as a whole providing consistent guidance in all its programs and following that guidance itself. It is to your credit that you involved Regional and Washington Office staff in your decision-making. Accordingly, we are copying the appropriate staff on this letter to advise them of our opinion.

In summary we cannot agree that the use of a substitute wood shingle is consistent with the *Standards*, nor the guidance found in *Preservation Brief 16*. We ask that you reconsider your decision. Should the Park chose to continue to prefer this alternative, we must advise you that our recommendation is that the proposed action will have an adverse effect on those qualities that make the CCC-era cabins and the newly nominated Park itself historic.

If you have any questions concerning our comments, or should you wish to discuss this issue further, please do not hesitate to contact me at (804)482-6088; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov. We look forward to your response and to working together with you to complete the Section 106 process on this project.

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Services and Review

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United States Department of the Interior

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Sent 3/7/12

L7617 (PRWI)

March 5, 2012

Ms. Kathleen Kilpatrick,
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

ATTN: Ethel Eaton

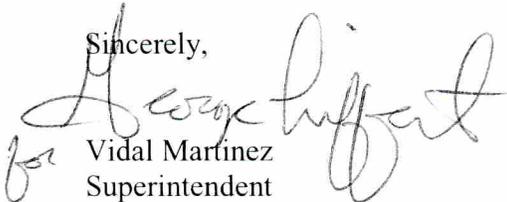
Subject: PEPC Project No. 40128 Installation of a Substitute Material Shingle on CCC-era structures
Prince William County, Virginia
DHR File No. 2012-3625

Dear Ms. Kilpatrick,

We received your letter of February 8, 2012 about the proposed project, Installation of Substitute Material Shingle on CCC-era structures. The letter noted that your office believes that the project would result in adverse effects on historic properties because the proposed work was inconsistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties*. We have therefore decided to concur with the determination of adverse effect for the proposed undertaking, and would like to consult further with the Virginia SHPO on resolving adverse effects. Under separate letter, the National Park Service (NPS) will notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect finding, and determine if the ACHP will participate in the consultation process pursuant to 36 CFR 800.6(a)(1). Once we have received the ACHP's response, we will contact your office to arrange a consultation meeting.

In the meantime, should you or your staff have any questions or need further information, please do not hesitate to contact me at (703)221-3366 (email Vidal_Martinez@nps.gov) or Paul Petersen, Chief of Resource Management at (703)221-3329 (email Paul_E_Petersen@nps.gov). We look forward to consulting further with the Virginia SHPO on this undertaking.

Sincerely,


for Vidal Martinez
Superintendent

cc: NPS – NCR ARD Perry Wheelock



United States Department of the Interior

NATIONAL PARK SERVICE
Prince William Forest Park
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L7617
March 30, 2012

Mr. John Fowler
Executive Director
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 803
Old Post Office Building
Washington, DC 20004

Subject: PEPC Project No. 40128 Installation of a Substitute Material
Shingle on CCC-era structures, Prince William County, Virginia

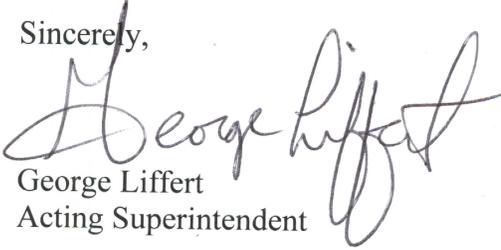
Dear Mr. Fowler,

This letter is to notify the ACHP of a finding of adverse effect for a proposed undertaking at Prince William Forest Park, a unit of the National Park Service (NPS). The park proposes to replace existing asphalt shingle roofing material with a composite roofing material on cabins constructed by the Civilian Conservation Corps, which includes approximately 170 structures. The cabins were constructed between 1936-1941 and are listed on the National Register of Historic Places under Criterion A for their association with New Deal era movements involving the Recreational Demonstration Area (RDA) program, whereby agriculturally depleted lands were restored by Civilian Conservation Corps members to construct recreational facilities for local underprivileged youth. The buildings also meet Criterion C for exemplifying rustic style architecture by utilizing indigenous materials within the natural landscape, and a design associated with the Emergency Conservation Works Act (ECW) and American Park Movement.

In its assessment of effect, the NPS had determined that the proposed undertaking would have no adverse effect on historic properties and sought the concurrence of the Virginia SHPO. However, the SHPO stated in its letter of February 8, 2012 to the NPS that the proposed project would result in adverse effects on historic properties because the proposed work was inconsistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties*. We have concurred with the SHPO finding that the proposed undertaking will result in an adverse effect on historic properties, and the NPS has informed the SHPO that it would like to enter into consultation to resolve the adverse effect. Pursuant to 36 CFR 800.6(a)(1), the NPS requests that the ACHP affirm or forgo participation in consultation to resolve adverse effects. Attached to this letter is documentation about the proposed undertaking as specified in 36 CFR 800.11(e). Once we have received a response from the ACHP, we will arrange a consultation meeting with the Virginia SHPO.

Should you or your staff have questions or need further information, please contact me at (703) 221-2366 (email George_Liffert@nps.gov) or Paul Petersen, Chief of Resource Management at (703) 221-3329 (email Paul_E_Petersen@nps.gov).

Sincerely,

A handwritten signature in cursive script that reads "George Liffert". The signature is written in dark ink and is positioned above the printed name and title.

George Liffert
Acting Superintendent

cc: Perry Wheelock, Associate Regional Director for Resource Stewardship and Science. National Capital Region, National Park Service



Preserving America's Heritage

April 19, 2012

Mr. George Liffert
National Capital Park-East
National Park Service
1900 Anacostia Park, SE
Washington, DC 20020

***Ref: Proposed Installation of Roof Shingles on Civilian Conservation Corps (CCC) Era Buildings
at Prince William Forest Park
Triangle, Prince William County, Virginia***

Dear Mr. Liffert:

On April 4, 2012, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on properties listed on and eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Virginia State Historic Preservation Office (SHPO) and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the opportunity to review this undertaking. If you have any questions, please contact Katry Harris at 202-606-8520, or via email at kharris@achp.gov.

Sincerely,

Raymond V. Wallace
Historic Preservation Technician
Office of Federal Agency Programs