



United States Department of the Interior

NATIONAL PARK SERVICE

Gateway National Recreation Area

210 New York Ave., Staten Island, N.Y. 10305

H4217 (GATE-S)

March 8, 2016

Mr. Andy Bennett
Director, Board of Directors
Army Ground Forces Association
Andy.bennett@armygroundforces.org

Reference: Demolition of Buildings 119, 120, and 104 at Sand Hook Unit, Gateway National Recreation Area: PEPC 61001

Dear Mr. Bennett:

We are writing to acknowledge receipt of your organization's request to be a "consulting party" in the 106 process for the above referenced project. Gateway National Recreation Area (GATE) continues to recover from the effects of Hurricane Sandy in October 2012. Among the properties damaged at the Sandy Hook Unit of GATE were various housing units used for seasonal housing, including buildings 119, 120, and 104. After considering their condition and susceptibility to future storms, GATE is proposing to demolish these buildings. We invite you to consult with us on the expected adverse effects to historic properties under Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800.

As you know, GATE housed seasonal workers and volunteers in buildings 119, 120, 104, and 108. Sandy demonstrated that it was not sustainable to continue to use most of these buildings for housing; the first floors of buildings 119 and 120 are 3-4 feet below the 100-year-flood elevation, and are in a moderate wave action zone, while the first floor of building 104 is 1.5 feet below the flood elevation. The first floors of the buildings were flooded and extensively damaged during the storm, and Sandy Recovery funding guidelines do not permit the expenditure of funds on repairs to such low-lying buildings to prior conditions for occupation. Building 108 sits slightly higher than the other structures and did not see the same level of damage. There is no foreseeable or feasible future use for 119, 120, or 104 due to their susceptibility for flooding and post-storm condition, and the park has decided that demolition is the best option. Building 102, a historic brick barracks also associated with the Proving Ground and located in a more flood-resistant location, will be rehabilitated to provide for the lost housing capacity. Building 102 has been vacant for many years. The one to one replacement of beds is

allowable under the park's housing plan and NPS policy which affords us the opportunity to rehabilitate 102 for housing.

Before demolition, the corners of each building will be GPS-located, and their location documented on Park maps for future reference. Buildings 119 and 120 will be demolished in their entirety, including the foundations and underground utilities. Following demolition, the building sites will be infilled and graded. The Building 119 site will be surfaced with gravel to provide additional parking for Building 102. The Building 120 site will be seeded to become a turf area.

The first and second floors of Building 104 will be demolished. The piping and equipment located in the basement will be removed. The above-ground brick foundation and below grade stone foundation will remain for interpretive purposes. The basement will be filled, graded and seeded with a grass seed mix or other low maintenance ground cover. A section of the brick foundation will be removed to allow access for grounds keeping. The exterior slate walkways will remain in situ, while the existing pipe rail clothes line will be relocated to the site of 108. During demolition a number of items will be removed and turned over to the Park for inclusion in the museum collection.

We also anticipate completing archaeological investigation and monitoring before and during demolition. Specifically, our in-house archaeologist has recommended the excavation of a small trench near the foundation of 104 and the piers of 119 and 120, the excavation of 1 by 1 m- units (by hand and screened) near the entrances to each building, and monitoring during demolition.

All three buildings are contributing elements to the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District. Constructed in 1894, Building 104 was a foreman's residence during the Sandy Hook Proving Ground era. It is a one-and-a-half story frame structure, and generally retains architectural integrity, with original materials obscured by later additions. Demolition of 104 will be completed in such a way to allow for the earlier fabric to be exposed and documented prior to full demolition. While the house dates to the Proving Ground era, arguably the most important historic period of the peninsula, it does not have any characteristics that contribute significantly to the understanding of the Proving Ground or its mission, being a typical frame house. The setting is also compromised, through the previous loss of nearby buildings that date from the time period and the forthcoming construction of the U.S. Coast Guard's proposed new multi-mission building directly across the street from Building 104, which will be a large intrusion on the district.

Buildings 119 and 120 were built in 1941 as part of the U.S. Army's 700 series of temporary wooden buildings developed in response to the massive mobilization of World War II. The interiors of 119 and 120 were gutted long ago, and retain little to no integrity. The exteriors generally retain integrity, though the exterior vestibule, doors, and current fire stairs are later additions. Buildings 119 and 120 are a tiny remnant of the nearly one hundred temporary structures that populated the Fort Hancock landscape during World War II, and the tens of thousands that were built across the country, well-documented in the Department of Defense Legacy Resource Management Program's historic context.

World War II and the US Army

Mobilization Program: A History of 700 and 800 Series Cantonment Construction. On their own, they do not represent the ubiquity of these structures that gave them their significance.

These three buildings were identified as part of the ruin band in the recent GMP, denoting the park's intention to either abandon in place or demolish the structures. According to the terms of the Programmatic Agreement signed for the GMP, GATE will consult on the planned treatment of each of the buildings categorized in the ruin band. Considering the susceptibility of these structures to future flooding, GATE has determined that demolition is the most appropriate action for them. Therefore, we have determined that this undertaking will have an **adverse effect** to historic properties.

We are working in coordination with the National Historic Landmark program in the Northeast Region on ways to minimize the impacts from this project and with the New State Historic Preservation Office (NJSHPO) to develop appropriate mitigation and a memorandum of agreement (MOA) for this action. In accordance with our responsibilities under 36 CFR 800.6(a)(1) and 800.10(b), we have informed the Advisory Council on Historic Preservation (ACHP) of the adverse effect to a National Historic Landmark district and have invited them to participate in this 106 process. We acknowledge that consultation will continue on the structures in the ruin band, and that there may be additional buildings for which demolition will be the preferred option; in the near future, GATE intends to consult on the future of the building complex known as North Maintenance, among others. Accordingly, we would like to invite you to discuss mitigation for this immediate action that holistically considers the cumulative effect of these demolitions or abandonments on the district, and takes into account other documentation that has been completed (namely, the WWII 700; series documentation completed by the US Army).

We do not take the decision to demolish historic structures lightly, but must be realistic in the face of the changing environment and limited resources. We will be setting up a call with all of our consulting parties to begin to discuss possible mitigation options that would be relevant to the intensity of the impact and look forward to your organizations ideas to better tell the story of the Proving Ground and Sandy Hook through the mitigation from this project. If you have further questions please contact Marilou Ehrler, Chief of Cultural Resources at 718-354-4561.

Sincerely,



Jennifer T. Nersesian
Superintendent

cc:

Katry Harris, ACHP
Dan Saunders, NJ SHPO
Bonnie Halda, NPS NER Chief Preservation
Services Tim Hudson, Hurricane Sandy Recovery
Manager Pete McCarthy, Sandy Hook Unit
Coordinator, GATE Colonel Shawn Welch, Retired



Ehrler, Marilou <marilou_ehrler@nps.gov>

Section 106 consultation1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org> Tue, May 3, 2016 at 7:32 PM
To: Jen Nersesian - NPS <Jen_Nersesian@nps.gov>, Marilou Ehrler - NPS <marilou_ehrler@nps.gov>
Cc: "Mike Murray (H)" <batterymills@hotmail.com>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>

Hi Jen, Marilou -

Thank you for allowing AGFA to be part of the consultation regarding Fort Hancock. This is a very special invitation and provides our membership (both the consulting team and the remainder who are watching/contributing) with a unique insight into deliberations regarding the future of facilities within the NHL. In order to learn more about the consultation process we have reviewed <http://www.achp.gov/regs-nhl.html>. We will meet the spirit and intent of these guidelines.

Last Friday, Katry Harris e-mailed AGFA the two letters (attached). We took note that AGFA was mentioned prominently in the letter sent to the GATE Superintendent. This prominent mention of AGFA, by the federal government's senior historic preservation office, left us both humbled and concerned.

We are most concerned that AGFA remains a viable and helpful partner of the NPS while the consultation effort proceeds in attempting to find mitigations that are acceptable to the NPS. We realize that this is harder than it appears. During the conduct of the consultation, AGFA members will likely see things that upset them, but, we realize the AGFA team must remember we cannot be privy to all the key issues impacting a topic and that we need to be respectful of the inherently governmental responsibilities of the NPS as custodians for the majority of the Fort Hancock/SHPG NHL.

For your awareness, the following AGFA members are part of the AGFA Consulting Team. Four of the six were on the call Friday.

Andy Bennett (could not attend the call)

Joe Janesic

Richard King

Tom Minton

Mike Murray (could not attend the call)

Shawn Welch

Other AGFA members that have supported with analysis and insight include:

Donna Cusano

Charles Gutch

Doug Houck

Anne Lutkenhouse

Paul Taylor

We eagerly await the next call and in the meantime have our thinking caps on regarding potential mitigating strategies.

V/R,

Shawn

Shawn Welch

Member, Board of Directors and Treasurer

Army Ground Forces Association

Cell phone (540) 220-2771

e-mail: Shawn.Welch@armygroundforces.org

Website: www.armygroundforces.org

Linked-In: <https://www.linkedin.com/pub/shawn-welch/63/7/4a3>

4 attachments

Nj.nps.gateway nra.sandy recovery at sandy hook unit.ap.27apr16.pdf

nj.nps.gateway nra.sandy recovery at sandy hook unit.con.27apr16.pdf

106K

Consultation Memo to AGFA - demo Bldgs 104 -119 and 120 - OCR.pdf

689K

ACHP _ Section 106 Regulations and NHL Consultation.pdf

57K



Ehrler, Marilou <marilou_ehrler@nps.gov>

Fort Hancock - Section 106 consultation - Ideas from **AGFA**

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Thu, May 12, 2016 at 7:35 PM

To: Jen Nersesian - NPS <Jen_Nersesian@nps.gov>, Marilou Ehrler - NPS <marilou_ehrler@nps.gov>

Cc: "Mike Murray (H)" <batterymills@hotmail.com>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, "Tom Minton (H)" <VMFA247@aol.com>, "Doug Houck (H)" <houckbd@yahoo.com>, "Dan Saunders (FACA)" <Dan.Saunders@dep.state.nj.us>, Katry Harris -ACHP <kharris@achp.gov>

Hi Jen, Marilou -

After the conference call and review of the memos from NPS to AGFA and from ACHP, we present these suggestions for further evaluation as possible strategies to mitigate the adverse impact of demolition. Once these buildings are gone, they are gone for good.

Overall:

A) Avoid demolition.

B) Evaluate reuse opportunities such as leasing.

C) Evaluate using the funds set aside for demolition for stabilization/ mothballing and relocation (#119 & #120) until an appropriate use can be found for the buildings.

Bldgs 119 & 120:

These are the last two of over 70 WWII wood barracks that once populated Fort Hancock. These buildings are ubiquitous to veterans from not only the WWII era, but also Korea, Vietnam, Persian Gulf and Operation Enduring Freedom and Iraqi Freedom. When visiting veterans see them, they have an immediate connection. We propose the following approaches to explore:

A) During the Requests for Expression of Interest (RFEI) for leasing at Fort Hancock, a non-profit historic group offered to take on one of the 1890s barracks (#23, #24 or #25). That group manages a major reenactment of over 600 people annually at Fort Indiantown Gap where WWII wood buildings are used (though modernized to current code standards). One or both of the WWII Wood barracks may support their operations in NJ. Open discussions with that group to ascertain if they are interested in taking on one or two WWII wood buildings for their operations.

B) Relocate the buildings to higher ground. There are a few potential locations, one of which is historic (near Btry Potter). See green circles on both maps.

C) Use funding designated for demolition to - (1) strip the interiors back to open bay, non-insulated WWII standard and mothball pending future use or (2) rehabilitate to WWII austere standard for use as open conference room, volunteer group housing, classroom or the like. Large open bays would be useful for a myriad of applications that are currently in need at Fort Hancock. For example, the open bay would be useful for a FACA committee meeting until a larger building like a gym is ready for use.

Bldg #104:

This building started life as Sandy Hook Proving Ground's senior civilian manager's quarters, signifying substantial significance to the landmark. The building has "tactical" communications connections within the structure. During WWII this was a senior NCO's family housing. The tactical communications indicates significant importance of the occupant during WWII. Bldg #108 (next to #104) also has this type of connectivity which suggests NCO's of significant importance to the landmark resided in these buildings during WWII and maybe later. The NPS documents provided earlier indicate that under the existing siding the original wooden siding is still existent. The building itself is dry, has an intact roof and generally intact 1980's windows. Even considering the crawlspace wall undermining on the southeastern corner, this building is in far better condition than most of the buildings on officer's row. It is worth noting that another building (#41- WWII Wood and formerly T-310) which was once the post office is now used as seasonal housing. It's first floor elevation is recorded at 10.2, and Bldg #104 is recorded at 10.4 first floor elevation. In consideration of the importance of this building to the landmark, we recommend the following: -

A) Cancel demolition and apply the demolition funds to stabilization and mothballing until a suitable use can be found for the building.

B) Explore offering the building for lease to potential lessees.

C) Explore partnering with non-profits and volunteer groups to restore, use and help maintain the buildings over time.

We are discussing other options internally and will offer them to you for consideration if we have some indication they are viable.

Thank you so much for your time and consideration during consultation.

V/R,

Shawn



Member, Board of Directors and Treasurer

Army Ground Forces Association

Cell phone (540) 220-2774

email: Shawn.Welch@armygroundforces.org

Website: www.armygroundforces.org

Linked-In: <https://www.linkedin.com/pub/shawn-welch/63/7/4a3>

2 attachments

Ft. Hancock • 1944 - demo Sec 106 consult.pdf

3406K

GATE_FEMAFloodZones_SandyHook_Fo rtHancock_20140303.pdf

1027K



United States Department of the Interior

NATIONAL PARK SERVICE
Gateway National Recreation Area
210 New York Ave., Staten Island, N.Y. 10305

29 June 2016

Mr. Andrew Bennett President.
Board of Directors
Army Ground Forces Association
401 N 12th Street, Frederick Army Air field,
Frederick, Oklahoma 73452

Reference: Building 104 at the Sandy Hook Unit, Gateway National Recreation Area: PEPC
61001

Dear Mr. Bennett:

We wanted to thank you and your organization for participating in our April 25 meeting, about the future of the above referenced building at Sandy Hook. During that meeting we discussed many options and since that time in an email sent on May 12, AGFA submitted alternatives for the park to consider with regard to the future of 104 as well as 119 and 120. Suggestions for alternatives outlined by AGFA included the following:

- A) *Avoid demolition.*
- B) *Evaluate reuse opportunities such as leasing.*
- C) *Evaluate using the funds set aside for demolition for stabilization/mothballing and relocation (#119 & #120) until an appropriate use can be found for the buildings.*

Since our meeting and receipt of AGFA's suggested alternatives we have begun to examine options for building 104 and assess the scope of work required to mothball and/or repair the building. At a minimum we anticipate the repair (not restoration) of building 104 would include the following:

Exterior

Northeast Corner Subsidence - fill and consolidate soil where lost
Repoint brick foundation crack just west of the subsidence: replace cracked bricks as required.
Remove existing asphalt shingle roof and flashing including main, 3 dormers, rear entry shed and front porch
Install new asphalt shingle roof and flashings including main, 3 dormers, rear entry shed and front porch
Repair/replace all rakes and cornices main and dormer roofs
Install new 1/2 round TCS gutters and leaders (leaders 4 main house: 2 porch; 1 rear shed; 2 front porch)
Siding: Replace approximately 24 missing shingles
Replace basement windows with flood vents - 2
Remove CMU infill in shed (north facade) install flood vent
Paint, doors, windows, trim and siding
Install new underground propane tank and lines to the building
Remove temporary rear stair

Construct new code compliant wood stoop and stairs at rear entry

Remove and salvage for reinstallation existing pipe rail handrail: paint and reinstall @ rear entry

Windows

Repair / replace approximately 6 - 6 / 6 Wood DH sash

Existing vinyl replacement sash to remain

Existing storm sash to remain

Rear Elevation center dormer: remove the plywood covering install new 6/6 DH sash

Repair/ replace 12 - 1/ 1 wood fixed sash at porch

Repair front west elevation door

Remove existing vinyl rear east elevation door: install new wood door and hardware

Interior

Systems

Remove boiler from basement

Install new boiler on 2nd floor in west linen closet

Rehabilitate existing radiators as required for hot water and install additional heating as required

Remove electric panel from basement

Install new electric panel above flood level on first floor

First Floor

Raise approximately 16 electrical outlets above the flood level Install new bathroom all new fixtures, plumbing and finishes

If residential use - Install new WD including all plumbing

If residential use - Install new kitchen including cabinets and appliances

Remove the remainder of the later gyp board (min hall and two west rooms)

Restore bead board wall finishes including replacement in-kind where previously removed (approx 25 LF: 3 feet high)

Paint all walls and ceilings

Refinish wood floors

Replace missing floor trim (approx 2 doors)

Second Floor

Patch and repair the plaster/ sheet rock walls and ceilings

Paint walls and ceilings

Refinish wood floors

Replace missing door including hardware

Install new hardware on 3 other doors

Install new bathroom all new fixtures, plumbing and finishes

Included in AGFA 's suggested alternatives is for NPS to evaluate reuse options such as leasing. To that end, NPS would like to formally offer building 104 to your organization for lease. As a not-for-profit organization we have the ability to negotiate a lease with your organization directly. The lease would be negotiated at fair market value and as with other leases, any expenses/costs associated with the repair of the building can be used to offset the cost of the lease. Although we have verbally discussed this idea with you in the past and I date you have declined, before finalizing a path forward we wanted to put this offer to you in writing.

NPS will need to continue the consultation process on the future of building 104, as well as buildings 119 and 120, in the near future and would appreciate a written response to this inquiry within 30 days. Thank you for your continued interest in Fort Hancock and the Sandy Hook Proving Ground National Historic Landmark District, we hope you will seriously consider our offer of this lease and look forward w continuing our consultation with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer T. Nersesian', with a long horizontal line extending to the right.

Jennifer T. Nersesian
Superintendent

CC:

Katry Harris. ACHP
Kate Marcopol, NJ SHPO
Bonnie Halda, NPS NER Chief, Preservation Services
Tim Hudson, Hurricane Sandy Recovery Manager
Pete McCarthy, Sandy Hook Unit Coordinator, GATE



ARMYGROUNDFORCE ASSOCIATION

401N12th Street, Frederick Army Airfield
Frederick, Oklahoma 73452

www.armyGroundForces.org

info@ArmyGroundForces.org

Employer ID: 20-8974480; Federal Tax ID: 311 / 6

Promoting and facilitating research, interest and pride in the history of our Army's Coast Artillery Corps

27 July 2016

Office of the Superintendent
Gateway National Recreation Area
ATTN: Building 104 at the Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001
210 New York Avenue
Staten Island, New York 10305

References:

a) Letter from Superintendent, GATE acknowledging AGFAs request for consultation reference: Demolition of Buildings 119, 120, and 104 at Sand Hook Unit, Gateway National Recreation Area; PEPC 61001

b) Letter from Superintendent, GATE, Subject: Building 104 at the Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001, dated 29 June 2016 (Suspense: 28 July)

Dear Superintendent Nersesian,

Thank you for your letter offering to AGFA a potential lease for Bldg #104 at Fort Hancock and Sandy Hook Proving Ground National Historic Landmark.

We are encouraged by your letter, particularly in that it signifies the NPS believes Bldg #104 is viable, and that engaging AGFA is a potential avenue to preserve it for continued use and appreciation by future generations. As it was originally constructed to house the senior civilian employee at the Sandy Hook Proving Ground, the one person most responsible for its overall operation, this building has substantial significance to the Landmark District. Given that so few buildings from the Proving Ground era remain in viable condition, your proposal is a welcome recognition of the building's significance.

Army Ground Forces Association is focused on fortifications restoration, preservation and interpretation. The projects we execute at Fort Hancock are complicated and require specialized skills. Most of our membership resides outside of New Jersey, so overnight housing to support work and interpretation periods is critical to our continued effectiveness and viability. This is specifically why our agreements with NPS have highlighted the criticality of volunteer housing provided by the NPS.

Since the closure of Bldg #102 in 2009, housing for work during months of peak park operations (summer months) has been problematic. Bldg #108 has been the primary facility to house volunteers in the summer months since 2011. While Bldg #108 is in better condition than most buildings within the Fort Hancock Historic Post, it has required repairs and restoration work, and needs more. Some of this has been executed by AGFA members and other volunteers. Bldg #108 has limited capacity (approximately 12 personnel maximum). AGFA requires capacity for approximately 20 personnel during work periods from June through September.

The potential of making both Bldg #104 with Bldg #108 available at the same time provides a doubling of existing volunteer housing capacity at Fort Hancock Historic Post for AGFA. We are aware of other cooperators who also need housing during the summer months and they need to be included in this effort.

The AGFA Board of Directors has determined it is advantageous for all concerned if we work with the NPS to explore all potential options, from traditional to cutting edge, to bring this building to a usable standard. Once we finalize our team for this effort, we will notify you in order to initiate moving forward with negotiations.

Thank you for consulting and engaging in conversation with us, and allowing us to provide you our experienced observations. We look forward to exploring the options to successfully preserve Bldg #104 in a usable state.

Sincerely,



Andrew Bennett
President, Board of Directors
Army Ground Forces Association



Shawn Welch
Finance Officer (Treasurer)
Member, Board of Directors
Army Ground Forces Association



Michael J. Murray
Member, Board of Directors
Army Ground Forces Association



Boyd Douglas Houck
Member, Board of Directors
Army Ground Forces Association



Ronald Brodzinski
Member, Board of Directors
Army Ground Forces Association



Thomas P. Minton
Member, Board of Directors
Army Ground Forces Association



Joe Janesic
Member, Army Ground Forces Association
Advisor to the Board
Historic Preservation



Ehrler, Marilou <marilou_ehrler@nps.gov>

RE: Ft Hancock & Sandy Hook Proving Ground NHL Buildings 104, 119 and 120

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Tue, Nov 29, 2016 at 4:04 PM

To: Marilou Ehrler - NPS <marilou_ehrler@nps.gov>, Jen Nersesian - NPS <Jen_Nersesian@nps.gov>

Cc: "Mike Murray (H)" <batterymills@hotmail.com>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, Kate Marcopul - NJSHPO <kate.marcopul@dep.nj.gov>, Meghan Baratta NJ SHPO <Meghan.Baratta@dep.nj.gov>, Sarah Killinger <Sarah_Killinger@nps.gov>, "Halda, Bonnie" <bonnie_halda@nps.gov>, David Uschold <david_uschold@nps.gov>, Judy Smith - NPS <Judith_Smith@nps.gov>, Patricia Rafferty <patricia_rafferty@nps.gov>, Katry Harris - ACHP <kharris@achp.gov>, "Joe Janesic (H)" <joe.janesic@solutionfactory.net>, "Tom Minton (H)" <VMFA247@aol.com>, "Richard C. King" <richard_king@verizon.net>

Good Afternoon Jen, Marilou -

The e-mail below from Tri-State is a serious disappointment. We realize the next steps of "mitigation and demolition" regarding buildings #104, #119 and #120 will soon proceed. We look forward to participating in these discussions.

In accordance with the ACHP guidelines on consultation regarding NHL adverse impacts, we request you consider the following favorably -

1) During the call, we learned that the actions (demolition component?) for this project (buildings #104, #119 and #120) and the maintenance relocation project are being separated. In this new action, we request consulting party status under Section #106 for both activities. We are excited and support this the Maintenance Relocation project. The resulting discontinuance of use of the industrial areas are important and we would like to contribute to and better understand the body of ideas for mitigation and use alternatives.

2) Buildings #119 and #120 - we are very interested in the proposed mitigations for demolition. If requirements cannot be eased so as to allow reuse of these two buildings, one mitigation action we recommend considering is the retention of a "facade representation" of one of the two barracks to retain the physical presence of a WWII era barracks at Fort Hancock. There were over 90 such barracks at Fort Hancock. Retaining a structural image of one is would be very useful in interpreting the primary period of activity for the Harbor Defenses. These buildings are part of the interpretive trail across the historic post walking tour. This approach has been taken at other sites where the original building is no longer viable or otherwise missing. This might work with the shell of Bldg #120.

3) Building #104 - Through the consultation process this building has been analyzed and offered twice for non-profit reuse. We recommend this building be offered to a wider audience of potential lessees. The first floor elevations are far less compelling than #119 and #120. We have learned that Bldg #104 is between 1 to 3 inches higher than at least three buildings the NPS assigned a high priority to preserve, is in better structural condition than at least half of the buildings at the post and can be brought to a usable standard more quickly than most. The cost to restore the building to the condition set out in your proposal appears to be between \$100k to \$200k. This is considerably less than most other structures within the historic post area. Given this is one of the few remaining proving ground structures, and the home of the proving ground's most senior civilian employee, we find it perplexing this is not

considered a fundamental resource. We recommend that instead of "restoration" to a condition far superior to that which existed when Hurricane Sandy struck (when the building was in use), potential lessees should be granted a staged restoration, requiring issues of safety and critical functionality be addressed in the first stage. This type of incremental approach should be considered for other buildings within the post area to make them more affordable and attractive to investment in the near term.

4) We came away from Monday's call with significant unanswered questions regarding NPS prioritization and the process used to arrive at the decision to demolish these three buildings. We are confused by the implications and definitions behind the "level of significance" and "fundamental resource" and find appendix B of the GMP to be contradictory regarding these classifications and the "band" assigned. We ask that we be provided the background information on these categories, their application, how they were assigned to the various resources, and how they impacted the analysis of alternatives. We base this request upon (but not exclusively) the information below:

GMP Record of Decision, Page 24:

... NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts "harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values" (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate "the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts" (NPS 2006 sec 1.4.5).

<http://www.achp.gov/regs-nhl.html>

Agency Responsibilities: (para V)

Provide background documentation to consulting parties (see 36 CFR Section 800.11(e)), including an analysis of alternatives considered to avoid, minimize, or mitigate adverse effects on the NHL. Because an NHL is involved, the Agency must focus the analysis of alternatives on actions which will minimize harm to the NHL and advance a preservation outcome, to the maximum extent possible. (see Section 110(f)).

We are looking forward to continued consultation and contributing to a more robust alternatives and mitigation before these once significant and very important buildings on one of our nation's more important National HistoricLandmark Districts are gone forever.

V/R,

Shawn



Member, Board of Directors and Treasurer

Army Ground Forces Association

Colonel (Ret), US Army

Cell phone (540) 220-2771

Email: Shawn.Welch@armygroundforccs.org

AGFA Website: www.armygroundforccs.org

Personal Linked-In: <https://www.linkedin.com/pub/shawn-welch/7/4a3>



Ehrler, Marilou <marilou_ehrler@nps.gov>

RE: Proposed mitigation: Section 106 Consultation

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Wed, Feb 1, 2017 at 1:29 PM

To: Marilou Ehrler - NPS <marilou_ehrler@nps.gov>

Cc: Judy Smith - NPS <Judith_Smith@nps.gov>, Kate Marcopul - NJSHPO <kate.marcopul@dep.nj.gov>, Katry Harris - ACHP <kharris@achp.gov>, Meghan Baratta NJ SHPO <Meghan.Baratta@dep.nj.gov>, "Mike Murray (H)" <batterymills@hotmail.com>, "Richard C. King" <richard_king@verizon.net>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, "Joe Janesic (H)" <joe.janesic@stationfactory.net>, Patricia Rafferty <patricia_rafferty@nps.gov>, Sarah Killinger <Sarah_Killinger@nps.gov>, David Uschold <david_uschold@nps.gov>, "Halda, Bonnie" <bonnie_halda@nps.gov>, Jen Nersesian - NPS <Jen_Nersesian@nps.gov>

Hi Marilou -

For the call next week, the AGFA team would like to discuss a potential mitigation strategy for demolition of Bldg #120 (formerly T-307).

The last plans we have seen for Bldg #120 indicate the building will be totally removed and seeded over to create a grassy area. Bldg #119 (formerly T-304) will be completely removed to create much needed parking for Building #102. These plans are attached as easy reference.

Bldg #119 and #120 are the last of over 90 WWII wood barracks at Fort Hancock. Within five hundred feet of these two buildings there were *five* WWII wood barracks (T-301, 302, 303, 305, 308) which are all long gone. Today there are fewer than ten WWII Wood structures remaining at Fort Hancock out of over 250 such structures. The attached 1944 map shows the number of 'T' structures - it was very significant. While some were temporary and built before WWII, the majority are WWII period construction. And almost all of them are now gone.

Maintaining the visual presence of at least one of these two barracks buildings should be a goal for effective mitigation of this adverse impact action.

One opportunity to retain a visual presence of the last WWII Wood barracks would be to turn #120 into a picnic pavilion. This could be done by removing the walls and all interior structure and pour a slab-on-grade in the footprint of the first floor. Retain the roof as a "topping" for the pavilion at the same height it is now. An additional consideration would be to leave the walls in place from the roof to the faux roof below the second story windows. Under that consideration the windows could be either retained or removed and either seal over the window area or leave the window area open to allow wind to pass through. If there are concerns about the closeness of the pavilion to Hartshorne Drive, a lite "fence" could be erected on the street side.

The benefits of the picnic pavilion would include providing a picnic area for residents in Bldg #102, a place for outdoor picnicking by future residents in the historic post area, a place for vendors to set up out of the sun and

wind (like bike vendors in the theater parking area). There are many uses this picnic area could provide to support Park goals and values.

These are conceptual thoughts that we would like to discuss during our call next week.

V/R,

Shawn



Member, Board of Directors and Treasurer
Army Ground Forces Association
Colonel (Ret), US Army

Cell phone (540) 220-277-t
e-mail: Shawn.Welch@armygroundforces.org
AGFA Website: www.armygroundforces.org

Personal Linked-In: <https://www.linkedin.com/pub/shawn-welch/63/7/4a3>

-----Original Message-----

From: Ehrler, Marilou [mailto:marilou_ehrler@nps.gov]
Sent: Wednesday, February 01, 2017 6:42 AM
To: Katry Harris; Marcopul, Kate; Baratta, Meghan; Shawn Welch (AGFA); Mike Murray (H); Andy Bennett - (AGFA); Halda, Bonnie; Sarah Killinger; David Uschold; Jennifer Nersesian; Patricia Rafferty; Joe Janesic
Cc: Judith Smith
Subject: Fwd: Fort Hancock and Sandy Hook Proving Ground NHL Buildings 104, 119 and 120 - Section 106 Consultation

Good morning all

I have received responses from all parties now and would like to set up this call/ discussion for next Thursday Feb 9 from 9 - 10 am. I will send an invite to the call with information on the call in number later today or tomorrow. Before the meeting I will be sending an agenda. Thank you all for participating in the doodle poll; we look forward to continuing our conversation.

Marilou

Marilou Ehrler, RA

Historical Architect, Chief of Cultural Resources

Gateway National Recreation Area

210 New York Avenue

Staten Island, NY 10305

Office: 718-354-4561

Cell: 917-831-8820

--- ----- Forwarded message ----- --

From: Ehrler, Marilou [mailto:marilou_ehrler@nps.gov]

Sent: Friday, January 20, 2017 2:01 PM

To: Katry Harris; Marcopul, Kate; Baratta, Meghan; Shawn Welch (AGFA); Mike Murray (H); Andy Bennett - (AGFA); Dave Waxtel; Allen kaplan; Halda, Bonnie; Sarah Killinger; David Uschold; Jennifer Nersesian; Patricia Rafferty
Cc: Judith Smith

Subject: Re: Fort Hancock and Sandy Hook Proving Ground NHL Buildings 104, 119 and 120 - Section 106 Consultation

Good afternoon and Happy New Year to all:

As you all know in late November 2016, Tri-State Historical Education Simulation Inc. indicated that they were no longer interested in pursuing a lease for buildings 119, 120 and 104 at Sandy Hook. What some of you may not know is that since then a new party has expressed interest in leasing 104 only. As our Business Services division works through the process with this new party and the Park works through the process of seeking approval from NPS to lease 104, we would like to continue our discussion about the future of these buildings.

Specifically we would like to set up a conference call to discuss appropriate mitigation to offset the adverse effect for the demolition of buildings 119 and 120 and should the current leasing effort for 104 fail, the demolition of 104. Shortly, I will be sending out a separate email, a doodle poll, with potential dates and times for a call and ask that you review your schedules and indicate your availability. We will select the date and time that works best for the largest number of participants while ensuring that at least one participant from each party is available to attend.

We look forward to continuing our discussion with you all.

Marilou

Marilou Ehrler, RA

Historical Architect, Chief of Cultural Resources

Gateway National Recreation Area



Ehrler, Marilou <rnarilou_ehrler@nps.gov>

RE: Ft Hancock and SAHO Proving Ground NHL -Mitigation

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Wed, Feb 8, 2017 at 10:29 AM

To: Marilou Ehrler - NPS <rnarilou_ehrler@nps.gov>, Katry Harris - ACHP <kharris@achp.gov>, sarah_killinger@nps.gov, Meghan Baratta NJ SHPO <Meghan.Baratta@dep.nj.gov>, Jen Nersesian - NPS <Jen_Nersesian@nps.gov>, Judy Smith - NPS <Judith_Srnith@nps.gov>, david_uschold@nps.gov, bonnie_halda@nps.gov, patricia_rafferty@nps.gov, Kate Marcopul - NJSHPO <kate.marcopul@dep.nj.gov>

Cc: "Joe Janesic (H)" <joe.janesic@solutionfactory.net>, "Richard C. King" <richard_king@verizon.net>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, "Andy Bennett (Farm)" <3alfarms@gmail.com>, "Mike Murray (H)" <batterymills@hotmail.com>, "Tom Minton (H)" <VMFA247@aol.com>

Fellow consulting members -

We realize that Marilou has yet to get an agenda out and that she is very busy with some significant "heavy lift" issues - we all understand and are supportive of her efforts.

On 7 December AGFA requested to have a meeting with Marilou regarding NPS process that arrived at the GMP Appendix B classifications. We have yet to engage in a that discussion. When that meeting occurs, Meghan Baratta (NJ SHPO) has asked to be party. That would be great because AGFA stands to learn a lot from the professionals in the room. In a brief discussion with Marilou on Monday this week, we did address the classification, park fundamental values (assets) and how they were determined. We have a lot to learn, and it also appears that some of the work done in the past does indeed need to be revisited.

Since Thursday's conference call is focused on mitigations, we in AGFA would like to address the following issues:

1) Mitigation for Bldg #119 and #120 demolition. AGFA recommends retaining a visual presence of the last WWII Wood barracks by altering bldg #120 into a picnic pavilion. Do this by removing the walls and all interior structure and pour a slab-on-grade in the footprint of the first floor. Retain the roof as a "topping" for the pavilion at the same height it is now. An additional consideration would be to leave the walls in place from the roof to the faux roof below the second story windows. Under that alternative the windows could be either retained or removed and either seal over the window area or leave the window area open to allow wind to pass through. If there are concerns about the closeness of the pavilion to Hartshorne Drive, a light duty "fence" could be erected on the street side. The benefits of the picnic pavilion would include providing a picnic area for residents in Bldg #102, a place for outdoor picnicking by future residents in the historic post area, a place for vendors to set up out of the sun and wind (like bike vendors in the theater parking area). There are many uses this picnic area could provide to support Park goals and values. These are the last two WWII wood barracks in Gateway of over 90 such barracks at Fort Hancock. They speak directly to the WWII through Cold War periods - a substantial portion of the time period of significance. The NPS Historic Resource Study by Edwin Bears states that the 1940s is the high water mark of significance and recognizes that the disappearance of WWII wood buildings was problematic to telling the WWII story (pages 3-5). Once they are gone, there is no bringing them back.

2) Separate Bldg #104 from the #119 and #120 discussion.

A) The building is in generally good shape - far better shape than most everything on officer's row.

B) The building is listed as a contributing structure in the NHL narrative on Item #7, page 7 as the "Foreman's Residence" - senior civilian employee at the proving ground. On item #7, page 3, the Proving Ground is stated as the most significant portion of the landmark district. Four structures (#114 - officer's club, #174A - proof battery, #109 - chem lab on USCG property and #350 - magazine) are listed as first order significance, all other proving ground structures are contributing to include #104 and #108 (both listed as ruins with Bldg #108 in use). It appears that of the other proving ground structures near #104, that #112 was demolished post Army transfer, and #106, #110 and #111 were demolished either just before or after transfer of the real property from Army to NPS.

C) The ruins category assigned to #104 does not appear to match the ruins description in Appx B - Structures in poor condition where one or more of the basic structural elements has been lost and due to this condition are without viable reuse options. Bldg #104 is clearly better condition than most buildings at Fort Hancock and it has viable reuse options. Bldg #104 was in use up until 2012 and is listed in the GMP as occupied.

D) The height of the first floor is actually higher than some buildings that are in use with less historic significance (we realized and support the importance of those buildings to the functioning of the Park).

E) Bldg #104 has an interested non-profit organization and NPS has stated they will work with them once their 501.c.3 status is restored. We realize that if that action were to fail (as with the last group), NPS desires to move forward with Demolition. We would like to know how long the offeror has until NPS moves forward with a demolition action.

XXXXXXXXXXXXX

As mentioned above, on 7 December AGFA asked for a meeting with Marilou to discuss the following questions regarding Appendix B of the GMP:

- 1) Definition of a Fundamental Resource - specific to Fort Hancock assets. We need to better understand the GMP definitions (pages 9-11). The lack of the proving ground being mentioned is most surprising. What are the governing documents that outline how the "yes/no" decision was made?
- 2) Level of Significance - specifically, the differences between national and state/local/contributing and the documents that underpin this analysis.
- 3) Band - what are the documents that detail how the analysis is to be conducted? What were the references that underpinned the analysis?
- 4) Potential use - what were the business rules and data points used to make these determinations?
- 5) Climate Change Vulnerability - what were the business rules and data points used to make these determinations?

Those questions are asked in light of the following:

GMP Record of Decision, Page 24:

... NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts "harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values" (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate "the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts" (NPS 2006 sec 1.4.5).

<http://www.achp.gov/regs-nhl.html>

Agency Responsibilities: (para V)

Provide background documentation to consulting parties (see 36 CFR Section 800.11 (e)), including an analysis of alternatives considered to avoid, minimize, or mitigate adverse effects on the NHL. Because an NHL is involved, the Agency must focus the analysis of alternatives on actions which will minimize harm to the NHL and advance a preservation outcome, to the maximum extent possible. (see Section 110(f)).

Marilou and I did have a short conversation on Monday, and we did discuss that there are no laws barring the demolition of historic structures and that has been relayed back to AGFA personnel.

What is in the law is a process (sec #106) to gain consensus on the way ahead and to do our best to avoid adverse impacts and preserve our history. The narrative above from the ACHP website makes it clear we need to give a good faith effort to avoid adverse impacts.

We reviewed the GMP for the "Fundamental Resources" and noticed that on pages 11 and 12 of the GMP the Sandy Hook Proving Ground was not mentioned. The NHL document sites it as the most significant part of the district - so this is an apparent disconnect of considerable significance. That directly impacts the value of #104.

We have reviewed the enabling legislation for the Park and there is no apparent language that would reduce the significance of the Proving Ground structures or other structures at Fort Hancock. While designations are made for the William Fitts Ryan Visitor Center (designation) and "World War Veterans Park at Miller Field". The only language in the legislation regarding preservation appears to be:

(g) Sandy Hook and Staten Island Units; programs for preservation, restoration, interpretation, and utilization of sites and structures

In the Sandy Hook and Staten Island Units, the Secretary shall inventory and evaluate all sites and structures having present and potential historical, cultural, or architectural significance and shall provide for appropriate programs for the preservation, restoration, interpretation, and utilization of them.


NPS personnel have mentioned lack of resources as the reason to demolish these buildings. To effectively consult on this topic a full understanding of GATEWAY infrastructure resource decisions is required as the portfolio encompasses the entire park. An analysis should be conducted to determine which non-historic buildings should be expended to ensure preservation of relevant historic buildings such as #104. It appears many non-historic buildings (i.e., not on the register) and many non-NHL contributing buildings are in full use throughout the GATEWAY holdings. With apparently nearly all housing at Miller Field, Fort Tilden and Fort Wadsworth in use, the absence of use at Fort Hancock is worthy of additional analysis and likely some course changes.

In terms of broader mitigations - is it appropriate to discuss advancing work on NPS facilities designated "preserve" with a focus on fortifications structures such as the mortar battery? Can improvements there be linked to a mitigation for loss of #119 and #120 even though they are clearly different structures with different purposes?

We are looking forward to the discussion tomorrow!

V/R,

Shawn



Member, Board of Directors and Treasurer

Army Ground Forces Association

Colonel (Ret), LIS Army

Cell phone (540) 220-2774

e-mail: Shawn.Welch @armygroundforces.org

AGFA Website: www.armygroundforces.org

Personal Linked - In: <https://www.linkedin.com/pub/shawn-welch/63/7/4a3>

-----Original Appointment-----

From: Google Calendar [mailto:calendar-notification@google.com] **On Behalf Of** marilou_ehrler@nps.gov

Sent: Monday, February 06, 2017 2:00 PM

To: marilou_ehrler@nps.gov; shawn.welch@armygroundforces.org; kharris@achp.gov; andy.bennett@armygroundforces.org; sarah_killinger@nps.gov; Joe Janesic; meg han .baratta@dep.nj.gov; jen_nersesian@nps.gov; judith_smith@nps.gov; Richard King; david_uschold@nps.gov; VMFA247@aol.com; bonnie_halda@nps.gov; patricia_rafferty@nps.gov; kate.marcopul@dep.nj.gov

Subject: Ft Hancock and SAHO Proving Ground NHL - Mitigation

When: Thursday, February 09, 2017 9:00 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Conference Call

more details »

Ft Hancock and SAHO Proving Ground NHL - Mitigation

Meeting: Fort Hancock and Sandy Hook Proving Ground NHL
Mitigation for the Proposed Demolition of Contributing Buildings
Section 106 Conference Call



ARMY GROUND FORCES ASSOCIATION

711 West Ute Avenue

Stillwater, Oklahoma 74075

www.ArmvGroundForces.org

info@ArmyGroundforces.org

Employer ID: 20-8974./80; Federal Tax ID: 31 1 16

Promoting and facilitating research, interest and pride in the history of our Army's Coast Artillery Corps

16 February 2018

Office of the Superintendent
Gateway National Recreation Area
ATTN: Gateway National Recreation Area; PEPC 61001
210 New York Avenue
Staten Island, New York 10305

References:

a) Letter from Superintendent, GATE, acknowledging AGFA's request for consultation reference: Demolition of Buildings 119, 120, and 104 at Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001, dated 8 March 2016

b) Letter from Superintendent, GATE, Subject: Building 104 at the Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001, dated 29 June 2016 (Suspense: 28 July)

c) Letter from Superintendent, GATE, Subject: Building #104 at the Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001, dated 26 September 2016 (Suspense: 28 July)

d) Letter from Superintendent, GATE, Subject: Demolition of Buildings #119, #120 and #104 at Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001, dated 16 January 2018 to New Jersey Deputy State Historic Preservation Officer

Dear Superintendent Nersesian,

We appreciate the continued opportunity to participate in consultation regarding the proposed demolitions and the overall consultation on the General Management Plan (GMP) 'Ruins Band' implementation.

Building #104 -

We are very happy to hear both from your office and from the prospective lessor of movement forward with a reuse lease. As this is the former Sandy Hook Proving Ground Foreman's (senior civilian employee) family residence, this is a very significant building. The Army rarely constructs housing for civilian employees. This is a testament to the importance of the mission of the site and the duty position of the individual for whom this was built.

However, we are very concerned to read that if the building lease is not executed and the building restored, that the NPS intends to move forward with demolition. The manner in which this building was offered for lease was very targeted and designed to move quickly. However, if this proposed lease were to fall through, the NPS should immediately include this building in the overall leasing program for Fort Hancock to give it a wider audience of prospective submitters. To the average homeowner, this building is a low cost and easy restoration. To demolish it is inconsistent with the offering for lease.

Buildings #119 and #120 -

We thank the NPS for reviewing additional options for preservation of Buildings #119 and #120, to include those recommended by AGFA for further exploration. We fully understand that any of the preservation options as currently outlined in the letter are unaffordable to the NPS and unrealistic given current NPS real property utilization plans.

There were over one hundred wood barracks and support buildings constructed between 1940 and 1942 at Fort Hancock (Sandy Hook). Of these, less than ten remain. Of the roughly ninety barracks buildings, #119 and #120 are the last of their kind within Fort Hancock. The 1981 NPS Historic Resource Study of Fort Hancock recommends focusing on the World War Two period of the post's history (page 4). The demolition of the last two temporary barracks greatly impacts the ability to fulfill this recommendation, particularly for that small percentage of the population who has served in the military, many of whom were housed in buildings like this during their training well into the 1970s.

We note that the buildings are referred to as "significantly damaged". These buildings have been standing for over 75 years and have withstood at least three major storms that likely resulted in flooding. We acknowledge that NPS has stated in previous consultation conference calls that an Industrial Hygiene mold report was not performed and therefore the level of mold has not been characterized. We believe that any necessary remediation would almost certainly be within the capabilities of a competent lessee.

We have reviewed the 1986 programmatic agreement (PA) regarding WWII wood buildings. This PA is tied to language in the 1983 National Defense Authorization Act directing DoD (Army in particular) to begin demolishing all temporary WWII wooden structures. The reasoning for this was to force the Army to begin a permanent facilities construction program to support the Reagan era defense buildup. It is interesting to note that none of the services have signed that particular document on the ACHP web page. That is significant as DoD is not a land holding agency within the Executive Branch. Only the services proper (Army, Air Force, Navy & Marine Corps) under Title 10 USC are land holding agencies and possess the appropriate statutory authority to make final determinations regarding real property. Most importantly, while the PA outlines treatment and documentation requirements, it is not a blanket approval for wholesale demolition of WWII structures.

We appreciate the acknowledgement of six buildings which are both being retained and are below the FEMA flood level. The following three buildings are in use by the NPS: Bldg #41 (WWII wood post office converted to barracks); Bldg #34 (fire house support structure); and Bldg #51 (firehouse). The following three buildings are in the lease plan and all three have letters of intent against them: Bldg #80 (civilian mule skinner's home); Bldg #36 (mule barn); Bldg #60 (service station).

This is significant from two perspectives. (1) This shows that the FEMA flood level has not discouraged reuse of three buildings by NPS, and (2) the three buildings below the FEMA flood level that are in the leasing program have active letters of intent as of 11 Feb 2018.

Of the entire leasing program portfolio, buildings #23, #24, #25, #114, #27, #36, #40, and #53, each with large interior space, have letters of intent by reputable entities to include local government. There is only one major building remaining (Bldg #70) with significant open interior space. See the attachment for a listing of buildings in the leasing program as of 10 February and their status regarding letters of intent.

Buildings #119 and #120 would provide significant open interior space for leasing reuse. Because these buildings are significantly altered from their historic state, they present a significant opportunity for reuse without significant historic preservation requirements being an impediment regarding the interior structure. Adding #119 and #120 to the leasing program would significantly enhance the available options in the program. Given their

location, they can support either activities at Bldg #36 (mule barn), Bldg #114 (Officer's Club) or the chapel (Bldg #35) which is very heavily used throughout the spring through early fall months for weddings, receptions and other activities.

We noted in your response that demolition cost for Bldgs #119 and #120 is at least \$817,000. This is a significant sum of money. We have been told that NPS execution of these funds is tied to Superstorm Sandy recovery funds. Assuming that is the case, these funds can be used for other related recovery actions. These funds can be applied to the damaged porches on Officer's Row. Only two out of sixteen severely damaged porches have been rehabilitated. The \$800,000 could be used to rehabilitate at least four more porches at the NPS quoted cost of \$200,000 each. This shifting of resources would result in a total of six out of sixteen porches repaired, absent the application of additional resources.

It is very difficult to reconcile the expenditure of \$800,000 or more on demolition of two viable buildings when so many other buildings that are identified for reuse require considerable work themselves either as a direct result of damage sustained from Superstorm Sandy or from general failure to execute routine maintenance and repair tasks over the past 40 years.

We believe NPS should make these two WWII wood barracks available in the general historic leasing program.

General Mitigation Thoughts-

The mitigation options outlined in the 16 January memo are transparent to the average visitor's experience. A few other WWII wood buildings exist at Fort Hancock, but their remote locations and uses do not readily tell the public their significance to the WWII era. During our last conference call, the ACHP representative stated a concern for the overall interpretation of the WWII period and asked to see the existing plans for interpretation. While we have not been included in those follow on discussions, we too are concerned about retaining the WWII character of the garrison area as well as the fortifications. It is our assessment that any mitigation regarding the ruins and facilities and fortifications should include the following:

- A) Greatly expanded maintenance and repair efforts for all historic structures - both facilities and fortifications- that are listed in the Stabilize and Preserve categories as defined in the General Management Plan's Appendix B.
- B) Greatly increased vegetation control on all buildings in the historic post area of Fort Hancock.
- C) Rigorous application of the Cultural Landscape Report for the Coastal Defense Batteries vegetation control standards for all Preserve and Stabilize fortification structures and the remaining components of the Sandy Hook Proving Ground.
- D) Rigorous application of the Cultural Landscape Report for Fort Hancock (historic post area) as informed by the recommendations of the Fort Hancock Historic Resources Study by Ed Bearrs (two editions).

We realize all of this will require the NPS to reprioritize their resources and capabilities to implement these recommendations. Reprioritization is appropriate given the stature of a National Historic Landmark District.

Provision of Volunteer Housing -

We noticed in the 16 January memo that Bldg #41 is currently used as housing and will be retained in the housing plan. AGFA has been informed that it is the NPS intent in the summer months to use a portion of this facility to support volunteer housing needs during summer work periods. AGFA has also been informed that between September and May (non-summer months), Bldg #102 will be available to support AGFA housing needs. This is all wonderful news.

AGFA's work in partnership with NPS within the landmark district is growing each year. Having housing available continues to enable significant maintenance and interpretation work. Overnight housing enables projects that require multiple days to execute from start to finish and provides the ability to draw talented members from outside of commuting distances - something that is critical to continued success.

Thank you for consulting and engaging in dialogue with us, and allowing us to provide input.

Sincerely,



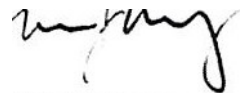
Andrew Bennett, PhD
President, Board of Directors
Army Ground Forces Association



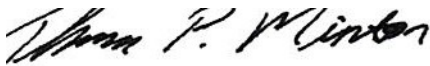
Ronald Brodzinski
Member, Board of Directors
Army Ground Forces Association



Boyd Douglas Houck, PE, LTC, USA (retired)
Boyd Douglas Houck, PE, LTC, USA (retired)
Member, Board of Directors
Army Ground Forces Association



Michael J. Murray
Member, Board of Directors
Army Ground Forces Association



Thomas P. Minton
Thomas P. Minton
Member, Board of Directors
Army Ground Forces Association



Paul Taylor
Member, Board of Directors
Army Ground Forces Association



Shawn Welch, COL, USA (retired)
Finance Officer (Treasurer)
Member, Board of Directors
Army Ground Forces Association



Joe Janesic
Member, Army Ground Forces Association
Advisor to the Board
Historic Preservation



Richard King, Esq
Member, Consultation Committee
Army Ground Forces Association



Gerald Still, Major General, USAF (Ret)
Member, Consultation Committee
Army Ground Forces Association

Copy Furnished:

Katry Harris, ACHP
Kate Marcopul, NJ SHPO
Meghan Baratta, NJ SHPO

Attachment:

Real Estate status page from Fort Hancock 21 Federal Advisory Committee Website as of 10 February 2018



Ehrler, Marilou <marilou_ehrler@nps.gov>

RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Wed, Mar 7, 2018 at 1:14 PM

To: Marilou Ehrler - NPS <marilou_ehrler@nps.gov>

Cc: Kate Marcopul - NJSHPO <kate.marcopul@dep.nj.gov>, "West-Rosenthal, Jesse" <Jesse.West-Rosenthal@dep.nj.gov>,

Katry Harris - ACHP <kharris@achp.gov>, Meghan Baratta NJ SHPO <Meghan.Baratta@dep.nj.gov>

Hi Marilou -

I have shared the memo and Meghan's mail below with our consulting team and we should be back to you with our response by Friday afternoon.

We do concur with Meghan's additions.

I did notice there is no mention of AGFA's position with regard to the proposed demolition and mitigation. We would like to go on record as reluctantly supporting the NPS determination and are looking forward to an increased level of preservation and interpretation at Fort Hancock. Is that possible in this document since we are not a signatory?

Will get back with you by Friday..

V/R,

Shawn

-----Original Message-----

From: Ehrler, Marilou (mailto: marilou_ehrler@nps.gov]**Sent:** Tuesday, March 06, 2018 11:19 AM**To:** Baratta, Meghan**Cc:** Marcopul, Kate; West-Rosenthal, Jesse; Katry Harris; Shawn Welch (AGFA)**Subject:** Re: DRAFT MOA for th e Demolition of SAHO Buildings 119 and 120

Thank you

Marilou

Marilou Ehrler, RA

Historical Architect, Chief of Cultural Resources

Gateway National Recreation Area

210 New York Avenue

Staten Island, NY 10305

Office: 718-815-7322

Cell: 917-831-8820

Please note - office phone number has changed

--- --Original Message-----

From: Baratta, Meghan [mailto:Meghan.Baratta@dep.nj.gov]

Sent: Tuesday, March 06, 2018 11:16 AM

To: Ehrler, Marilou

Cc: Marcopul, Kate; West-Rosenthal, Jesse; Katry Harris; Shawn Welch (AGFA)

Subject : RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

Hi Marilou - I took a quick look at the MOA & it does look like what we all agreed to on the call. I do recommend that you add deadlines for all of the mitigation - so under Stipulation A 1 & 2 - please clarify that the proposed mitigation will be done before the buildings are demolished & when the NJ HPO can expect that documentation. Will anyone other than the NJ HPO receive a copy of the documentation? It is typical that copies of photographs are sent to more than one repository. I have no experience with the 3D modeling or the GIS data so I am not sure if it is too much to ask to make duplicate copies of that information.

Under A. 3 Interpretation of WWII Era - Can this work be done within 6 months of demolition? - Please let us know what you suggest. We of course recommend a timeframe that NPS can meet - but no longer than 2 years. You reference a CR code- do you mean a QR code?

I do want Jesse to look at the MOA- He is scheduled to be back on Monday 3/12. Please let me know if you have questions.

Thanks-

Meg

Meghan Macwilliams Baratta

Supervising Historic Preservation Specialist

NJHPO

Mail Code 501-04B

PO Box 420

Trenton, NJ 08625-0420

(609) 292-1253 phone

(609) 984-0578 fax

-- ---Original Message-----

From: Ehrler, Marilou [mailto:marilou_ehrler@nps.gov]

Sent: Monday, March 05, 2018 3:57 PM

To: Marcopul, Kate; Katry Harris; Baratta, Meghan; Shawn Welch (AGFA)

Subject: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

Dear Katry, Kate, Shawn and Meghan

Attached please find a draft MOA for the above reference project for your review and comment. As we discussed our intent is to document these two structures using photography and 3D modeling which will be included in a wayside and the GATE app. Our hope is that this documentation will also provide background information for the future development of a representation of the WWII period in the district.

Please let me know if you would like any changes. If possible, please respond no later than March 16 and when you do respond, please respond to all.

Once we receive all comments, I will revise the document and post the MOA for public comment. Thank you

Marilou

Marilou Ehrler, RA

Historical Architect, Chief of Cultural Resources

Gateway National Recreation Area

210 New York Avenue

Staten Island, NY 10305

Office: 718-815-7322

Cell: 917-831-8820

Please note - office phone number has changed



Ehrler, Marilou <marilou_ehrler@nps.gov>

[EXTERNAL] RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

1 message

Shawn Welch (AGFA) <shawn.welch@armygroundforces.org>

Tue, Jun 5, 2018 at 5:14 PM

To: Meghan Baratta NJ SHPO <Meghan.Baratta@dep.nj.gov>, Marilou Ehrler - NPS <marilou_ehrler@nps.gov>

Cc: Kate Marcopul - NJSHPO <kate.marcopul@dep.nj.gov>, Katry Harris • ACHP <kharris@achp.gov>, "West-Rosenthal, Jesse" <Jesse.West-Rosenthal@dep.nj.gov>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, "Mike Murray (H)" <batterymills@hotmail.com>

Hi Marilou, Meghan -

This looks good - it is what we discussed.

Thank you!

V/R,

Shawn

-----Original Message-----

From: Baratta, Meghan (mailto: Meghan.Baratta @dep.nj.gov)**Sent:** Tuesday, June 05, 2018 3:56 PM**To:** Ehrler, Marilou; Marcopul, Kate; West-Rosenthal, Jesse; Katry Harris; Shawn Welch (AGFA)**Subject:** RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

Hi Marilou - Hopefully you received my message this morning. I went over the MOA for 119 & 120 & it includes the deadlines that the NJ HPO asked for in my 3/6/18 Email. The MOA is acceptable.

Thank you.

Sincerely,

Meghan

Meghan MacWilliams Baratta

Supervising Historic Preservation Specialist

NJ HPO

Mail Code 501-048

PO Box 420

Trenton, NJ 08625-0420

(609) 292-1253 phone

10/16/2018

DEPARTMENT OF THE INTERIOR Mail - [EXTERNAL] RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

(609) 984-0578 fax

-----Original Message-----

From: Baratta, Meghan [mailto:Meghan.Baratta@dep.nj.gov]
Sent: Thursday, May 31, 2018 2:04 PM
To: Ehrler, Marilou; Marcopul, Kate; West-Rosenthal, Jesse; Katry Harris; Shawn Welch (AGFA)
Subject: RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

Thank you Marilou. We will have it logged in & take a look at it.

Meghan

Meghan MacWilliams Baratta

Supervising Historic Preservation Specialist

NJ HPO

Mail Code 501-04B

PO Box 420

Trenton, NJ 08625-0420

(609) 292-1253 phone

(609) 984-0578 fax

-----Original Message-----

From: Ehrler, Marilou (mailto:marilou_ehrler@nps.gov)
Sent: Wednesday, May 30, 2018 4:11 PM
To: Baratta, Meghan; Marcopul, Kate; Jesse West-Rosenthal; Katry Harris; Shawn Welch (AGFA)
Subject: Fwd: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

All

I realize we talked about this and exchanged emails in March and here it is May but after some time out of the office I am finally catching up and trying to move things forward. The following draft, includes changes made to address AGFA's request as well as changes requested by NJSHPO adding dates and location of repositories. As agreed, all field work will be completed before demolition; the completion of the 30 modeling will dictate when we can complete the wayside so the QR code will work.

Attached is a final draft of the MOA. If this is acceptable to you, then we will post it for public comment. Thanks again for all of your help with this.

Marilou

Gateway National Recreation Area

210 New York Avenue

Staten Island, NY 10305

Office: 718-8 15-732 2

Cell: 917-83 1-8820

Please note - office phone number has changed

-----Original Message-----

From: Baratta, Meghan [mailto:Meghan.Baratta@dep.nj.gov]

Sent: Tuesday, March 06, 2018 11:16 AM

To : Ehrler, Marilou

Cc: Marcopul, Kate; West-Rosenthal, Jesse; Katry Harris; Shawn Welch (AGFA)

Subject: RE: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

Hi Marilou - I took a quick look at the MOA & it does look like what we all agreed to on the call. I do recommend that you add deadlines for all of the mitigation - so under Stipulation A 1 & 2 - please clarify that the proposed mitigation will be done before the buildings are demolished & when the NJ HPO can expect that documentation. Will anyone other than the NJ HPO receive a copy of the documentation? It is typical that copies of photographs are sent to more than one repository. I have no experience with the 3D modeling or the GIS data so I am not sure if it is too much to ask to make duplicate copies of that information.

Under A. 3 Interpretation of WWII Era - Can this work be done within 6 months of demolition? - Please let us know what you suggest. We of course recommend a timeframe that NPS can meet - but no longer than 2 years. You reference a CR code - do you mean a QR code?

I do want Jesse to look at the MOA- He is scheduled to be back on Monday 3/12. Please let me know if you have questions.

Thanks-

Meg

Meghan MacWilliams Baratta

Supervising Historic Preservation Specialist

NJ HPO

Mail Code 501-04B

PO Box 420

Trenton, NJ 08625-0420

(609) 292-1253 phone

(609) 984-0578 fax

-----Original Message-----

From: Ehrler, Marilou [mailto:marilou_ehrler@nps.gov]

Sent: Mon day, March 05, 2018 3:57 PM

To: Marcopul, Kate; Katry Harris; Baratta, Meghan; Shawn Welch (AGFA)

Subject: DRAFT MOA for the Demolition of SAHO Buildings 119 and 120

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Attached please find a draft MOA for the above reference project for your review and comment. As we discussed our intent is to document these two structures using photography and 3D modeling which will be included in a wayside and the GATE app. Our hope is that this documentation will also provide background information for the future development of a representation of the WWII period in the district.

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Marilou

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[**MOA DRAFT for SAHO 119, 120 demo 5-30-18 (2).docx**

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