

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. Daniel Saunders, Deputy SHPO
Mail Code 501-04B
State of New Jersey
Department of Environmental Protection
Historic Preservation Office
P.S. Box 420
Trenton, New Jersey 08625-0420

Reference: Demolition of Buildings 119, 120, and 104 at Sand Hook Unit, Gateway National Recreation Area; PEPC 6100 1

Dear Mr. Saunders:

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 would like to consult with your office 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, both from this project and as a continuation of consultation on the implementation of the ruin band concept in GATE's General Management Plan (GMP).

As previously discussed with your office during consultation on the rehabilitation of building 102 and during a site visit, 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 (Consultation: August 2015: PEPC 44721; HPO H 2015-071 PROD; DPO 15-2613-1), Building 102 has been vacant for a number of years.

Before demolition, the corners of each building will be GPS-located; 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. Building 119 site will be surfaced with gravel to provide additional parking for Building 102. 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 walls 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 investigations 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 US 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 inside. 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 well 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 with your office on the planned treatment of each of the buildings categorized in the ruins band. Considering the susceptibility of these structures to future flooding, the unsuitability for productive use, 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 have granted the request of the Army Ground Forces Association (AGFA) to be a consulting party for this project. 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 I 06 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. GA T~ intends to consult on the future of the building complex known as North Maintenance, among others. Accordingly, we would like to discuss mitigation for this immediate action with your office 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 U.S. Army).

We would like to set up a call with your office at a time convenient to you, to begin to discuss possible mitigation options that would be relevant to the intensity of the impact. We hope you can concur with this determination. If you have further question please contact Marilou Ehrler, Chief of Cultural Resources at 718-354-4561.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jennifer T. Nerseian', with a long horizontal flourish extending to the right.

Jennifer T. Nerseian
Superintendent

cc: w/o enclosures:

Bonnie Halda, NPS NER Chief, Preservation Services

Tim Hudson, Hurricane Sandy Recovery Manager

Daryl Lindeman, Project Manager. DSC

James Grant, Chief, Facility Management Division, GATE

Pete McCarthy, Sandy Hook Unit Coordinator, GATE



State of New Jersey

MAIL CODE 501-04B

DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATURAL & HISTORIC RESOURCES

HISTORIC PRESERVATION OFFICE

P.O. Box 420

Trenton, NJ 08625-0420

TEL. (609) 984-0176 FAX (609) 984-0578

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

May 23, 2016

Jennifer T. Nersesian
Superintendent
Gateway National Recreation Area
National Park Service
United States Department of the Interior
210 New York Avenue
Staten Island, New York 10305

Dear Superintendent Nersesian:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the Federal Register on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40553-40555), I am providing Consultation Comments on the following proposed undertaking:

Monmouth County, Middletown Township

Demolition of Buildings 119, 120 and 104

Gateway National Recreation Area, Sandy Hook Unit

National Park Service

800.4 Identification of Historic Properties

Thank you for providing the Historic Preservation Officer (HPO) with the opportunity to review and comment on the potential for the above-referenced undertaking to affect historic properties. The proposed undertaking is located entirely within the boundaries of the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District, which was designated as a National Historic Landmark on December 17, 1982. Buildings 119, 120 and 104 contribute to the significance of the Landmark District.

800.5 Assessing Effects

I concur with your assessment that the demolition of Buildings 119, 120 and 104 will have an adverse effect on the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark District. I acknowledge the General Management Plan included all three buildings in the "ruin band" based on concerns about climate change, and the buildings repetitive flooding issues. I look forward to consulting with you on ways to avoid, minimize, or mitigate the adverse effects, following the

terms of the Programmatic Agreement and as discussed in our conference call on the project on April 25th.

Additional Comments

Thank you for your proactive efforts to preserve Fort Hancock and the Proving Ground Historic District. Please reference HPO project number 14-4779 in any future calls, emails, submissions or written correspondence to help expedite your review and response. If you have any questions, please feel free to contact Jesse West-Rosenthal (609-984-6019) of my staff with questions regarding archaeology or Meghan MacWilliams Baratta (609-292-1253) with questions regarding historic architecture.

Sincerely,



Daniel D. Saunders
Deputy State Historic
Preservation Officer

Cc: Marilou Ehrler, NPS



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)

January 16, 2018

Ms. Kate Marcopul, Deputy SHPO Mail Code 501-04B
State of New Jersey
Department of Environmental Protection
Historic Preservation Office
P.O. Box 420
Trenton, New Jersey 08625-0420

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

Dear Ms. Marcopul:

As you are aware Gateway National Recreation Area (GATE) has proposed to demolish Buildings 119, 120, and 104 all contributing resources to the Fort Hancock and Sandy Hook Proving Ground NHL district. We initiated formal consultation with your office in March of 2016 and held a conference call with all parties the following month. On March 2, 2017, we held a second conference call to continue consultation; ACHP, the NPS Northeast Region NHL program, Army Ground Forces Association (AGFA), the Park, and your office participated in the call. At this time we would like to continue consultation on the demolition of Buildings 119 and 120 only. Consultation on the future disposition of Building 104 will, if necessary, be completed at a later date.

Building 104 Lease Update

Over the past two years NPS has attempted to lease Building 104 first to AGFA who determined that the rehabilitation of the building was not feasible for them and then to a second 501(c)3. Unfortunately that lease failed and NPS advertised a request for bid to lease the building. In response to that request we received one bid. Unfortunately we were unable to proceed to lease and the request for bid was re-advertised. In late November 2017, we received a single bid which is currently under review by our regional office. Our hope is that we will be able to move this forward to a lease in the near future. Please note that with the exception of AGFA's interest in leasing, all of the proposals have been from the same or a related party. Based on this party's continued interest, at this time, we no longer anticipate moving forward with the demolition of Building 104. If this lease negotiation fails, we will let you know and reinitiate consultation on the future disposition of Building 104.

Building 119 and 120

Buildings 119 and 120 were built in 1941 as part of the U.S. Army's 700 series of temporary wooden buildings (known as T- Buildings) developed in response to the mobilization of World War II. The interiors of 119 and 120 were previously gutted, and have no integrity. The exteriors retain some level of integrity, though the exterior vestibule, doors, and current fire stairs are later additions. Both buildings were significantly damaged by Sandy.

Prior to Hurricane Sandy, Buildings 119, 120 and 104 were used for seasonal housing; in response to damage from Sandy, seasonal housing was moved to a permanent Proving Ground Era building that sits above the FEMA flood level, Sandy Hook Building 102. NPS consulted with your office on the rehabilitation and reuse of Building 102 in June 2015 (HPO H 2015-071 PROD 15-2613-1). In our consultation for Building 102, we notified your office of our intent to move seasonal housing out of 119 and 120, indicating that, given their location and the damage these structures sustained in the hurricane, the buildings were placed in the ruin band in the GMP. We included a visit to these buildings during our walkthrough in August of 2014 and noted that while a final decision with regard to the disposition of these buildings had not been made, demolition would likely be considered. The rehabilitation of Building 102 is currently underway and the new seasonal housing units will be ready for occupancy this summer. This will satisfy the park's need for seasonal housing for the site.

During our call last March, you asked NPS to document alternatives to demolition. Following is a review of alternatives that have been considered.

Alternatives to Demolition:

Relocation

AGFA suggested moving these two structures to higher ground, out of the flood zone. In 2016 and again in 2017, an effort was made to find a location out of the flood zone where WWII structures once stood at Fort Hancock. AGFA compared WWII maps with the FEMA flood maps and suggested one location near Battery Potter: a location which flooded during Sandy. (WWII map and FEMA flood maps were submitted to your office via email in April 2016 and have been attached to this letter for reference).

One location on the maps, a knoll located east of between 102 and southwest of buildings 113 and 114, which although not out of the FEMA flood zone is higher than the existing site and is a site where WWII temporary barracks previously stood, was considered by NPS. The cost to prepare this new site, move the structures and clean up the existing site has been estimated by NPS to be approximately \$5,169,879 (slightly more than \$2.5 million per building). This includes interior and exterior repairs, mold remediation and resiliency repairs including moving building systems above the flood level.

Given that NPS no longer has a use for buildings 119 and 120, it is unlikely that we will receive funding to relocate the buildings. In addition, as noted during our previous conversations, relocation of the structures to a new site would likely also be an adverse effect.

Picnic Shelter Alternative

The second alternative suggested by AGFA was reuse of one building or both buildings as picnic shelters. AGFA noted correctly that NPS was creating a shade structure out of a historic aircraft hangar in one of our NY units which was flooded by Sandy and suggested that NPS consider a similar

approach for one or both of these structures. NPS noted that the airplane hangar being converted to a shade structure, Hangar 38 at Miller Field on Staten Island, was constructed of masonry and steel with a concrete slab on grade and that steel framing was being added to brace the structure. The adaptive reuse of the hangar was determined to be an adverse effect.

Buildings 119 and 120 are wood framed, constructed on masonry pier foundations. To convert these wood frame structures to shade structures the buildings would have to be lifted, slabs poured, new pier foundations constructed to a higher level (to lift the wood frame out of the flood zone) and bracing added to ensure the future stability of the structures in daily use as well as to withstand future storms and wave action. The extent of the changes required to adaptively reuse these structures as resilient shade or picnic structures would be extensive. Additionally, the siting of these structures is not operationally or from a site-planning perspective a desirable location for establishing a new visitor picnic area within the park. Based on these reasons, all agreed during our call that the proposed changes and reuse would have an adverse effect on the resources and this alternative was dismissed.

In addition to the alternatives suggested by AGFA, NPS considered the following alternatives to demolition.

Raising in Place

NPS reviewed the condition of Buildings 119 and 120 and considered raising the first floor of the buildings out of the flood plain. As indicated in earlier correspondence the existing first floor levels of buildings 119 and 120 are 7.91 and 8.52 feet respectively, in the FEMA AE 12 zone with moderate wave action. While NPS has put Sandy funding into buildings whose first floor levels were below the FEMA flood level, those structures were limited to the firehouse Building 51 (first floor elevation at 8.53) which has a slab on grade, its adjacent support structure Building 34 (first floor elevation 11.35) and Building 41, a WWII temporary barrack adjacent to the lighthouse.

Building 41, which despite having a first floor elevation of 10.2 received minimal damage during Sandy, was returned to service to provide seasonal housing the following summer. It will continue to provide housing and remains part of the housing plan. Other structures whose first floor elevations are below the FEMA flood level include Buildings 80, 36, and 60, all of which are in the leasing plan for the Park. A list of buildings that NPS has repaired post-Sandy along with their floor elevations was provided to AGFA, ACHP and your office via email on April 25, 2016.

Buildings 119 and 120 as noted above are wood framed with pier foundations. Raising buildings 119 and 120, 3-4 feet above the flood level will have a significant impact on the resources and in our opinion would likely constitute an adverse effect. Although we did not prepare a cost estimate for this work specifically, based on the cost estimate prepared for relocation, NPS assumes the cost to raise the structures would be approximately 1.5 to 2 million for each structure. This would include interior and exterior repairs and resiliency upgrades to the structure. There also would be a significant work and costs associated with making the structures accessible at their higher elevation.

Because we have relocated the seasonal housing to Building 102, securing funding for the raising and repair of the structures without a use is unlikely.

Lease

Finally, NPS previously offered Buildings 119 and 120 for lease to the Tri-State Historical Education Simulation, Inc. a 501(c)3. After review, Tri-State determined that the rehabilitation of the buildings was not feasible for them and terminated their interest in the buildings and the undertaking.

As outlined above NPS has considered alternatives to the demolition of Buildings 119 and 120 including relocation, raising (lifting above the flood level), deconstruction to create a shade structure, and leasing. The cost to relocate and/or raise the buildings was estimated to be approximately \$5.1 million and \$3-4 million respectively. NPS has estimated the cost for demolition of 119 and 120 to be approximately \$871,350. NPS acknowledges that while demolition is never the preferred outcome, some of the alternatives considered including relocation, raising and reuse as picnic pavilions would also have an adverse effect on the structures and the district, and might not preserve the historic appearance of the structure.

With the rehabilitation of Building 102 for seasonal housing, NPS has no foreseeable use for the buildings. Given the limited resources available to the park for future rehabilitation, the original intent of the buildings as a temporary structures, and the fact that there is no foreseeable future NPS use for the buildings, relocation and/or raising are unlikely to be funded.

NPS has determined that the demolition of Buildings 119 and 120 will have an adverse effect on the qualities that qualifies Fort Hancock and the Sandy Hook Proving Ground National Historic Landmark District due to the removal of a contributing building to the WWII era of occupation. We would like to continue consultation with your office under Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800, both for this project and as a continuation of consultation on the implementation of the ruin band concept in GATE's General Management Plan (GMP).

Both 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 with your office on the planned treatment of each of the buildings categorized in the ruin band. Considering the susceptibility of these structures to future flooding, the lack of a productive NPS use, and the number of alternatives NPS has explored including leasing and rehabilitation by others, GATE has determined that demolition is the most appropriate action. Therefore, we have determined that this undertaking will have an adverse effect to historic properties.

To minimize the effect, NPS is proposing to map the corners of each building using GPS coordinates which will be documented on Park maps for future reference. We also anticipate completing archaeological investigation and monitoring before and, depending on the findings, possibly during demolition. Specifically, our in-house archaeologist has recommended the excavation of a small trench near 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, depending on the findings of the initial investigation, monitoring may be recommended.

Because similar buildings have been documented formally in accordance with the Programmatic Memorandum of Agreement Among the United States Department of Defense, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers that went into effect on July 2, 1986, NPS proposes to photograph the building and grounds using National Register photo documentation standards, and deposit those photos in the park archives, with your office, and with the NPS Technical Information Center for electronic retrieval.

At this time we would like to continue formal consultation with your office, ACHP and AGFA beginning with the development of a draft Memorandum of Agreement to mitigate this adverse effect. If

you have further questions please contact Marilou Ehrler, Chief of Cultural Resources at 718-354-4561.

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.

AGFA

ACHP

CC w/o enclosures:

Bonnie Halda, NPS NER Chief, Preservation Services

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

H4217 (GATE-S)

January 16, 20 18

16-1343-2 JWR
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Ms. Kate Marcopul, Deputy SHPO Mail Code 501-04B
State of New Jersey
Department of Environmental Protection
Historic Preservation Office
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Reference: Demolition of Buildings 119, 120, and 104 at Sandy Hook Unit, Gateway National Recreation Area; PEPC 61001

Dear Ms. Marcopul:

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Building 104 Lease Update

Over the past two years NPS has attempted to lease Building 104 first to AGFA who determined that the rehabilitation of the building was not feasible for them and then to a second 501(c)3. Unfortunately that lease failed and NPS advertised a request for bid to lease the building. In response to that request we received one bid. Unfortunately we were unable to proceed to lease and the request for bid was re-advertised. In late November 2017, we received a single bid which is currently under review by our regional office. Our hope is that we will be able to move this forward to a lease in the near future. Please note that with the exception of AGFA's interest in leasing, all of the proposals have been from the same or a related party. Based on this party's continued interest, at this time, we no longer anticipate moving forward with the demolition of Building 104. If this lease negotiation fails, we will let you know and reinitiate consultation on the future disposition of Building 104.

Building 119 and 120

Buildings 119 and 120 were built in 1941 as part of the U.S. Army's 700 series of temporary wooden buildings (known as T- Buildings) developed in response to the mobilization of World War II. The interiors of 119 and 120 were previously gutted, and have no integrity. The exteriors retain some level of integrity, though the exterior vestibule, doors, and current fire stairs are later additions. Both buildings were significantly damaged by Sandy.

Prior to Hurricane Sandy, Buildings 119, 120 and 104 were used for seasonal housing; in response to damage from Sandy, seasonal housing was moved to a permanent Proving Ground Era building that sits above the FEMA flood level, Sandy Hook Building 102. NPS consulted with your office on the rehabilitation and reuse of Building 102 in June 2015 (HPO H 2015-071 PROD 15-2613-1). In our consultation for Building 102, we notified your office of our intent to move seasonal housing out of 119 and 120, indicating that, given their location and the damage these structures sustained in the hurricane, the buildings were placed in the ruin band in the GMP. We included a visit to these buildings during our walkthrough in August of 2014 and noted that while a final decision with regard to the disposition of these buildings had not been made, demolition would likely be considered. The rehabilitation of Building 102 is currently underway and the new seasonal housing units will be ready for occupancy this summer. This will satisfy the park's need for seasonal housing for the site.

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Given that NPS no longer has a use for buildings 119 and 120, it is unlikely that we will receive funding to relocate the buildings. In addition, as noted during our previous conversations, relocation of the structures to a new site would likely also be an adverse effect.

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To minimize the effect, NPS is proposing to map the corners of each building using GPS coordinates which will be documented on Park maps for future reference. We also anticipate completing archaeological investigation and monitoring before and, depending on the findings, possibly during demolition. Specifically, our in-house archaeologist has recommended the excavation of a small trench near 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, depending on the findings of the initial investigation, monitoring may be recommended.

Because similar buildings have been documented formally in accordance with the Programmatic Memorandum of Agreement Among the United States Department of Defense, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers that

went into effect on July 2, 1986, NPS proposes to photograph the building and grounds using National Register photo documentation standards, and deposit those photos in the park archives, with your office, and with the NPS Technical Information Center for electronic retrieval.

At this time we would like to continue formal consultation with your office, ACH P and AGFA beginning with the development of a draft Memorandum of Agreement to mitigate this adverse effect. If you have further questions please contact Marilou Ehrler, Chief of Cultural Resources at 718-354-4561.

Sincerely,

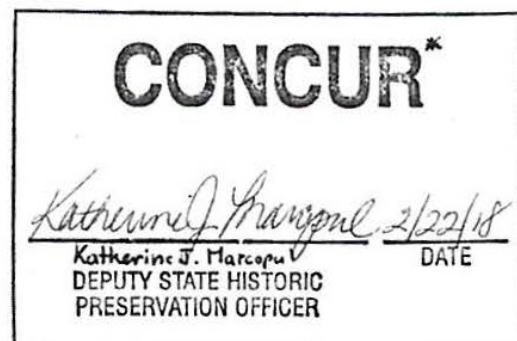


Jennifer T. Nersesian
Superintendent

cc.
AGFA
ACHP

CC w/o enclosures:

Bonnie Halda, NPS NER Chief, Preservation Services
Brian Strack, Hurricane Sandy Recovery Manager
Daryl Lindeman, Project Manager, DSC
James Grant, Chief, Facility Management Division, GATE
Pete McCarthy, Sandy Hook Unit Coordinator, GATE



* As per the February 22, 2018 conference call between the NPS, the HPS, the ACHPO, and the AGFA, documentation shall also include 3-D laser-scanning of the structures proposed for demolition, as well as the development of interpretive materials, to include a wayside sign.