



United States Department of the Interior

NATIONAL PARK SERVICE

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

26 September 2016

Mr. Allen S. Kaplan
Kaplan & Bookbinder
Attorneys at Law
2586 Highway 9 South
Howell, New Jersey 07731

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

Dear Mr. Kaplan:

We are writing to acknowledge receipt of your request on behalf of the Tri-State Historical Education Simulation, Inc. to be "consulting party" in the 106 process for the above referenced project and 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. We would also like to again thank the Tri-State Historical Education Simulation, Inc. for their interest in these buildings and their expressed "willingness to take on the preservation" of these resources; an interest expressed in the letter dated September 2, 2016 and most recently expressed by Mr. David Waxtel during the meeting of the Fort Hancock 21st Century Advisory Committee (FHAC). We acknowledge that the group previously expressed an interest in these buildings and in a letter dated August 19, 2016, we confirmed our intention to demolish these structures and suggested that the group consider leasing other historic structures that are already included in our leasing plan.

As you know, 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 and 120, as well as 104. These buildings were identified as part of the ruin band in the recent General Management Plan (GMP), denoting the park's intention to either abandon in place or demolish the structures. According to the terms of the Programmatic Agreement signed with the State Historic Preservation Office (SHPO) 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 and the difficulty obtaining NPS funding for these low lying structures, GATE has determined that demolition is the most appropriate action for them. We do not take the decision to demolish historic structures lightly, but must be realistic in the face of climate change, sea level rise and limited resources.

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. The first floors of the buildings were flooded and extensively damaged

during the storm. The interiors of 119 and 120 were altered long ago, and retain little to no integrity. The exteriors generally retain integrity, though the exterior vestibule, doors, current fire stairs and accessibility ramps are later additions. To minimize the damage while we explored options for the structures, immediately following Sandy we removed the interior finishes to the flood line the fabric removed was not historic. What it revealed was the fact that the exterior sheathing was gypsum sheathing, sheathing which took on and retained water. Despite our efforts a strong odor of mold overwhelms you as you enter these buildings even today.

Both buildings are contributing elements to the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark 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. 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, it remains the opinion of NPS that they do not present a clear and complete picture of what Fort Hancock looked like during WWII and do not represent the ubiquity of these structures that gave them their significance. A copy of a map from 1943 showing the number of temporary structures spread across Fort Hancock is included for your reference.

Given the continued interest in these specific structures we thought it best to outline what would be expected should the Tri-State Historical Education Simulation Inc. wish to lease buildings 119 and 120. These requirements were briefly discussed with Mr. Waxtel during the FACA meeting. Based on the condition of these buildings, the group's proposed use, and NPS policies and guidelines for climate change at a minimum we would anticipate that the repair of 119 and 120 would include the following:

- As historic structures all proposed work must be in keeping with the Secretary of Interior Standards for the Treatment of Historic Properties; given their condition and the proposed use of the first floor as a demonstration area and the second floor for housing, it is likely that the appropriate Standard would be the Standard for Rehabilitation.
- All proposed alterations will have to be in keeping with all laws, regulations and building codes.
- Preparation of a full code assessment which will likely include a change of use from residential to possible assembly use for the first floor must be submitted with documents to NPS for review.
- Upgrade all life safety systems as required by the codes including NFPA 101.
- Remove the exterior siding to a minimum of 2' above the FEMA flood level; salvage for reinstallation. (Note: 2' above FEMA is required by NPS policy to take into consideration climate change which FEMA flood maps do not).
- Remove the exterior gypsum siding to a minimum of 2' above the FEMA flood level. (Note: 2' above FEMA is required by NPS policy to take into consideration climate change which FEMA flood maps do not).
- Install new wood sheathing (wood plank or marine grade plywood which can be submerged would be required).
- Reinstall siding; install new siding where the original was damaged during removal. Material, detail including dimension, thickness and exposure to match original.
- Given that these buildings are located in an area of moderate wave action rebuilding of the accessibility ramps to meet hurricane standards may be required.

- Install new mechanical, electrical and plumbing systems above the FEMA flood level. NPS policy requires all critical infrastructure to be installed FEMA plus 3' (again FEMA maps do not take into consideration climate change). The first floor elevation of 119 is 7.91 feet; the first floor elevation of 120 is 8.53 feet. Given their low first floor levels it is likely that all systems will have to be moved to the second floor.
- Install resilient finishes on the first floor interior. This could include painted wood floors, the use of cement board, etc.
- Install flood vents as required.
- Install floor drains in the first floor as required.
- Prepare documentation of the proposed scope of work and submit to NPS for review.
- Because the buildings are federally owned historic structures, all maintenance and rehabilitation work will require review for compliance with the National Historic Preservation Act (NHPA) Section 106 and National Environmental Protection Act (NEPA). Section 106 will likely include consultation with the State Historic Preservation Office (NJ SHPO). Both reviews are coordinated through the Park; submissions to NJ SHPO are made by the Park.

Given that hundreds of WWII temporary buildings, storehouses and barracks, were located throughout the historic district an alternative to some of the work required to make the buildings resilient may be to move them to higher ground. Note that this approach may be perceived as having an adverse effect on these specific buildings and may require mitigation.

- Locate a new higher site within the historic district where WWII temporary structures previously existed. It would be best if this site was outside of the FEMA 100 year flood level. A copy of the FEMA flood map for Fort Hancock cantonment area is attached for your reference. A comparison with the 1943 map will show that there may be a few potential sites that meet this requirement.
- Prepare the site installing new underground utilities, new parking, accessibility and new foundations for the buildings.
- Move the buildings to the new site.
- Complete the repair and rehabilitation work for the new use outlined above. Depending on the elevation of the new site, some modifications to the scope of work required to make the building resilient may be possible.

Please note that the above lists are not meant to be exhaustive but were developed to provide the Tri-State Historical Education Simulation, Inc. some understanding of the requirements for the project.

NPS would like to formally offer buildings 119 and 120 to the Tri-State Historical Education Simulation, Inc. for lease. Given the Tri-State Historical Education Simulation, Inc.'s status as a not-for-profit organization we have the ability to negotiate a lease with the organization directly. The terms and conditions of the lease would require the Tri-State Historical Education Simulation, Inc. to pay Fair Market Value Rent for use and occupancy of the facilities. NPS might consider an offset of capital improvements made by the Tri-State Historical Education Simulation, Inc. Additional information with regard to submission of a proposal and requirements for leasing can be found on the FHAC website at <http://www.forthancock21.org/>.

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 to continuing our consultation with you. We would appreciate a response to this inquiry within 30 days.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer T. Nerseian". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jennifer T. Nerseian
Superintendent

CC:
Katy Harris, ACHP
Kate Marcopul, NJ SHPO
Bonnie Halda, NPS NER Chief, Preservation Services
GATE



Ehrler, Marilou <marilou_ehrler@nps.gov>

David Waxtel-Tri-State Historical Education Simulation Inc.

1 message

quanprint@aol.com <quanprint@aol.com>

Tue, Oct 25, 2016 at 7:37 PM

To: Meghan.Baratta@dep.nj.gov, kharris@achp.gov, marilou_ehrler@nps.gov, andy.bennett@armygroundforces.org, askkap@aol.com, Kate.Marcopul@dep.nj.gov, Rosenthal@dep.nj.gov, bonnie_halda@nps.gov, Jen_Nersesian@nps.gov, sarah_killinger@nps.gov, david_uschold@nps.gov

I cannot do anything on 11/4 Our fall convention is taking place in Lancaster PA i have to be there by 5pm Thursday 11/3

It has been sometime since we began the discussion about the future of buildings 119, 120 and 104 at Sandy Hook. Over the past several months we have been discussing these buildings with the Army Ground Forces Association (AGFA) and more recently with the Tri-State Historical Education Simulation Inc. Late last month we sent letters to both organizations asking each to confirm their interest in leasing the buildings. At this time we would like to continue our discussions with regard to the future of these buildings.

The focus of the call will be to confirm each parties interest in specific buildings, to discuss impacts on the Fort Hancock and Sandy Hook Proving Ground NHL and if needed strategies to consider the cumulative impacts of projects in the district and how to complete the 106 process effectively.

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

From: David WAXTEL [mailto:quanprint@aol.com]

Sent: Sunday, November 27, 2016 4:07 PM

To : Shawn Welch (AGFA)

Cc: Marilou Ehrler - NPS Jen Nersesian - NPS; Mike Murray (H); Andy Bennett - (AGFA); Jesse West-Rosenthal; Kate Marcopul - NJSHPQ Meghan Baratta NJ SHPO; Sarah Killinger; Allen Kaplan; Halda, Bonnie; David Uschold; Judith Smith; Patricia Rafferty; Katry Harris - ACHP; Joe Janesic (H); Tom Minton (H); Richard C. King

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

David Waxtel

Our Organization had a meeting today and our board have decided to back out of this project because of the extensive funds needed and the requirements on the buildings including moving utilities to the second floor.

We are sorry for delaying your plans.



Ehrler, Marilou <marilou_ehrler@nps.gov>

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

1 message

Wed, Jan 25, 2017 at 11:51 AM

Dave <quanprint@aol.com>

To: "Ehrler, Marilou" <marilou_ehrler@nps.gov>

We are no longer interested in the matter or the property

David Waxtel 917-797-6787

Sent from my iPhone

On Jan 25, 2017, at 11:49 AM, Ehrler, Marilou <marilou_ehrler@nps.gov> wrote:

Dear Mr Kaplan and Mr Waxtel

Earlier this year you requested consulting party status for the Tri-State Education Simulation Inc for the above referenced action. We realize that you are no longer interested in leasing the buildings at Sandy Hook but invited you to participate in this call as a consulting party. If you are no longer interested in participating or being a consulting party for this project please let us know in writing. If you remain interested please respond to the doodle poll. As of now Thursday Feb 2 and Thursday Feb 9, 9-10 am on both dates, are the leading candidates for the date and time.

Thank you again for your interest in Fort Hancock and the Sandy Hook Proving Ground NHL.

Marilou Ehrler, RA.

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

From: **Ehrler, Marilou** <marilou_ehrler@nps.gov>

Date: Fri, Jan 20, 2017 at 2:00 PM

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

To: Katty Harris <Kharris@achp.gov>, "Marcopul, Kate" <Kate.Marcopul@dep.nj.gov>, "Baratta, Meghan" <Meghan.Baratta@dep.nj.gov>, "Shawn Welch (AGFA)" <shawn.welch@armygroundforces.org>, "Mike Murray (H)" <batterymills@hotmail.com>, "Andy Bennett - (AGFA)" <andy.bennett@armygroundforces.org>, Dave Waxtel <Quanprint@aol.com>, Allen kaplan <askkap@aol.com>, "Halda, Bonnie" <bonnie_halda@nps.gov>, Sarah Killinger <Sarah_Killinger@nps.gov>, David Uschold <david_uschold@nps.gov>, Jennifer Nersesian <Jen_Nersesian@nps.gov>, Patricia Rafferty <patricia_rafferty@nps.gov>

Cc: Judith Smith <judith_smith@nps.gov>

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

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210 New York Avenue
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Cell: 917-831-8820

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