



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. Reid Nelson
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

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

Dear Mr. Nelson:

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. In accordance with our responsibilities under 36 CFR 800.6 (a)(1) and 800.10(b), we are writing to inform you of an adverse effect to a National Historic Landmark District under Section 106 of the National Historic Preservation Act from this action, and invite you to participate.

Prior to Hurricane Sandy, GATE housed seasonal workers and volunteers in buildings 119, 120, 104, and 108. Sandy demonstrated that it was not sustainable to continue to use 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. Building 102, a historic brick barracks associated with the Proving Ground and located in a more flood-resistant location, will be rehabilitated to provide for the lost housing capacity. 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. After demolition, the site of 119 will be converted to gravel parking to support building 102, the site of 120 will be covered in turf, and building 104 would be taken down to its foundation walls, which would be left in place, partially filled, and topped with turf. See enclosures for project description, photos, and maps.

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. 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 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 inside. The exteriors generally retain integrity, though the exterior vestibule, 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 ruins band in the recent park 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 for the GMP, GATE will consult with the SHPO 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 and the limited historical significance of these particular structures, 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. We are working with the New Jersey State Historic Preservation Office (NJSHPO) to develop appropriate mitigation and a memorandum of agreement (MOA) for this action that holistically considers the cumulative effect of these demolitions with others proposed under the GMP in the district, and takes into account other documentation that has been completed (namely, the WWII 700 series documentation completed by the US Army). As this is an adverse effect to a National Historic Landmark district, we invite you to participate in the resolution of these effects.

If you have questions on the project please contact Marilou Ehrler, Chief of Cultural Resources, at 718-354-4561 or marilou_ehrler@nps.gov.

Sincerely,

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

Jennifer T. Nersesian
Superintendent

cc:

Kathry Harris, ACHP

Dan Saunders, NJ SHPO

Bonnie Halda, NPS NER Chief, Preservation Services

Tim Hudson, Hurricane Sandy Recovery Manager



Preserving America's Heritage

April 27, 2016

Ms. Jennifer T. Nersesian
Superintendent
Gateway National Recreation
Area 210 New York Avenue
Staten Island, NY 10305

Ref: *Hurricane Sandy Recovery Activities at Sandy Hook Unit
Gateway National Recreation Area, New Jersey*

Dear Ms. Nersesian:

In response to notification by the National Park Service (NPS), the Advisory Council on Historic Preservation (ACHP) has notified the Director of the NPS that we will participate in consultation to develop a Memorandum of Agreement for the proposed Relocation of Maintenance Facilities to More Sustainable Locations and the Demolition of Buildings 119, 120, and 104 at the Sandy Hook Unit of the Gateway National Recreation Area in New Jersey. Our decision to participate in this consultation is based on the Criteria for Council Involvement in Reviewing Individual Section 106 Cases, contained within our regulations. The criteria are met for this proposed undertaking because the case presents important questions of policy or interpretation and has the potential for presenting procedural problems.

As you know, the ACHP was contacted by the Anny Ground Forces Association (AGFA), a non-profit association which has long demonstrated an interest in the preservation of the NHL. AGFA has objected to the proposed demolition of Building 104, the Foreman's Quarters for the World War II-era Sandy Hook Proving Ground and a contributing element to the Fort Hancock and Sandy Hook Proving Ground National Historic Landmark (NHL). We have subsequently participated in a phone meeting with NPS, the New Jersey State Historic Preservation Office (SHPO), and AGFA during which these concerns were detailed and discussed.

We look forward to the NPS' response to the concerns raised by AGFA in that teleconference. We understand that Building 104 was designated in the "ruin band" of the Gateway NRA General Management Plan (GMP), approved with a Record of Decision on June 11, 2014. Consultation and careful consideration of the issues raised by AGFA is warranted because the NPS has not yet met the requirements of the 2014 *Programmatic Agreement among the New York SHPO, New Jersey SHPO, and Gateway National Recreation Area, National Park Service for Implementation of the General Management Plan (PA)*. Without having completed the stipulated "consultation on the treatment of historic properties designated as ruins" for the Sandy Hook Unit, the current consultation will serve to provide the opportunity for "input on final decision regarding which properties will be designated as ruins. As stated in the GMP/EIS the priority banding (including the 'ruins' designation) may be updated as the result of new or better information and further consultation." (Stipulation 11.C) In addition, we feel it is important to discuss all of the current Sandy Recovery undertakings in the Sandy Hook Unit in a single Section 106 consultation so that the parties may consider whether cumulative

effects may occur that could be adverse. We and the other consulting parties are very interested in the opinions of the NPS' Northeast Region NHL Coordinator, whom you have indicated is participating in the consultation. In this role, the NHL Coordinator represents the Secretary of Interior and has the ability to provide to all the parties an expertise in defining the key characteristics of the NHL and in assessing they may be adversely affected by the proposed undertakings in accordance with 36 CFR §800. 10(c) of the Section 106 implementing regulations, "Protection of Historic Properties."

We look forward to working with the NPS and other consulting parties to consider alternatives to this undertaking that could avoid, minimize, or mitigate potential adverse effects on historic properties and to reach a Memorandum of Agreement. To continue the consultation, please contact Ms. Katry Harris by telephone at (202) 517-0213 or by e-mail at kharris@achp.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom", with a stylized flourish extending to the right.

Tom McCulloch, Ph.D., R.P.A.
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs