



**The Commonwealth of Massachusetts**  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

October 7, 2011

George Price  
Superintendent  
Cape Cod National Seashore  
National Park Service  
99 Marconi Site Road  
Wellfleet, MA 02667

RE: North Beach Island Cottages, Chatham (Sampson-Bloomer, Crowell, Crowell Shed, Dubis, Pratt-Carroll, and Lumpkin Cottages) MHC #RC.51242

Dear Mr. Price:

This is in response to your letter received at this office on September 13, 2011, regarding the North Beach Island Cottages, Chatham. In that letter, you request the concurrence of this office regarding your finding that the six cottages are not historic. In your opinion, all six cottages are ineligible for listing in the National Register of Historic Places, as all were rebuilt ca. 1992.

We are unable to concur with your opinion at the present time. We draw your attention to issues raised by Dr. Kirk Ranzetta (September 11, 2011), writing on behalf of North Chatham cottage permittees, and Donald Aikman, Vice-Chairman, Chatham Historical Commission (September 20, 2011). In these letters, the correspondents reference two recent findings by the Keeper of the National Register of Historic Places.

The first finding is for the Dune Shacks of the Peaked Hills Bars (DOE 1989; pending National Register nomination, 2011), located in Provincetown and Truro. In the 1989 Determination of Eligibility (DOE), the Keeper wrote that "Because of the continuous shifting conditions of the dunes and the problem of erosion, some of the dune shacks have been moved short distances to ensure their preservation. Because the shacks are part of a district and because of the expected impact of the harsh dune environment, their movement within the same general environment is acceptable and does not detract from the district's eligibility." Under the DOE, the Keeper found the Dune Shacks eligible for the National Register under Criteria A, B, and C. The 2011 National Register nomination for the Dune Shacks expanded upon the DOE. It established a period of significance extending to 1991, the latest date that a historic property was rebuilt. Among the character-defining features described in the pending National Register nomination for the Dune Shacks, it was noted that "...the shacks possess a transient quality that parallels the ever-changing landscape. The shacks are additive, evolving structures. Many have been moved back from the shoreline and raised up on piers in

response to rapid accretion and erosion of the sand. Weathering necessitates frequent replacement of materials and occasional rebuilding."

The second finding relates to the 2010 formal Determination of Eligibility (DOE) by the Keeper of the National Register for the Mitchell River Bridge in Chatham. In that DOE, the Keeper asserts that the bridge is "a rare surviving example of a structure embodying the distinctive characteristics of a once-common method of construction," adding that the bridge, "constructed in 1980 atop the pilings of an earlier bridge, is one of a continuous line of wooden drawbridges that have spanned this river crossing for more than 150 years." The Keeper found the Mitchell River Bridge eligible for the National Register under Criteria A and C.

The North Chatham Beach Island Cottages, like the Dune Shacks, are resources moved, raised, repaired with replacement materials, and rebuilt in response to their harsh environment. Like some of the Dune Shacks, the present North Chatham Beach Island Cottages were built less than 50 years ago, rebuilt of consistent materials and scale to their predecessors. Like the Mitchell River Bridge, The North Chatham Beach Island Cottages are resources constructed on the sites of previous similar structures. In the case of the North Chatham cottages, this represents continuity of use in the same location for at least sixty years.

As noted in the letters of Dr. Ranzetta and Mr. Aikman, there appears to be a discrepancy between your recent opinion of ineligibility for the North Chatham Beach Island Cottages and the Keeper's two recent decisions on the Dune Shacks and the Mitchell River Bridge. Therefore, as the State Historic Preservation Officer, I am unable to concur with your opinion regarding the North Chatham Beach Island Cottages. I suggest that you seek a formal Determination of Eligibility from the Keeper of the National Register pursuant to 36 CFR 800.4 (c )(2) and 36 CFR 63.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800).

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
Massachusetts Historical Commission

xc: see attached



xc: Katry Harris, Advisory Council on Historic Preservation  
Kelly Fanizzo, Advisory Council on Historic Preservation  
Ken Salazar, Secretary of the Interior  
Jon Jarvis, Director of the National Park Service  
Dennis Reidenback, National Park Service, Northeast Region  
Steve Whitesell, Associate Director, Park Planning, Facilities & Land, NPS  
Elizabeth Merritt, Assistant General Counsel, National Trust for Historic Preservation  
U.S. Senator John Kerry, U.S. Senator  
U.S. Senator Scott Brown  
U.S. Representative William Keating  
State Representative Sarah Peake  
State Representative Daniel Wolf  
Jill R. Goldsmith, Town Manager, Town of Chatham  
Florence Selden, Chairman, Chatham Board of Selectman  
Robert D. Oliver, Chairman, Chatham Historical Commission  
Chatham Historical Society  
William Hammatt, Town of Chatham Representative, Cape Cod National  
Seashore Advisory Commission  
Ted Keon, Town of Chatham Director of Coastal Resources  
Chatham Conservation Commission  
Wampanoag Tribe of the Gay Head (Aquinnah)  
Mashpee Wampanoag Tribe  
NPS Permittees Robert E. Crowell, Jr., Donna Lumpkin, Roger & Susan Carroll,  
Arthur Bloomer and Robin Dubis-Zibrat  
Robert Long, Town of Chatham North Beach Advisory Committee  
Duane Landreth, Esq., LaTanzi, Spaulding & Landreth, P.C.  
Kirk Ranzetta, Ph.D., Cardno Entrix