

IN REPLY REFER TO:

# United States Department of the Interior

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

July 8, 2019

RE: Correspondence Response - Demolish Sandy Hook Buildings 119 & 120 - PEPC ID: 61001

Dear Interested Party:

Consistent with Section 106 of the National Historic Preservation Act, the National Park Service (NPS) provided an opportunity for public comment on the Draft Memorandum of Agreement (MOA) among NPS, the Advisory Council on Historic Preservation (ACHP) and the New Jersey State Historic Preservation Officer (NJSHPO) for the demolition of Buildings 119 and 120 in the Sandy Hook Unit of Gateway National Recreation Area, Monmouth County, NJ.

I am writing to thank you for submitting comments on this proposed project. In total, we received comments from five individuals and each commenter voiced concern about the demolition of these two historic structures. We appreciate the passion that you have for the history of the site and its resources as well as your concerns relating to the demolition of these two historic structures that represent part of Fort Hancock's World War II history.

The decision to propose demolition of these historic structures was made after much deliberation, evaluation of all options and effects, and lengthy consultation. In addition to the MOA, the NPS record for public comment included documentation of the decision making process. This included records of meetings and phone calls conducted as part of the extensive consultation process, identification of the organizations and consulting parties involved, and documentation of the alternatives to demolition that were considered.

Public comments received question why NPS did not include these building in the leasing program. Although these buildings are not included in the NPS Request for Proposals for leasing at Fort Hancock, the record for public comment provided documentation that NPS attempted to lease buildings 119 and 120 to two different organizations. Both potential lessees withdrew from consideration following their independent review of the costs to elevate or relocate the structures, to make required repairs, and to rehabilitate the buildings. Each potential lessee noted that cost was the reason for withdrawal. In addition to the high cost of rehabilitation, the first floor elevation of these building is below the Federal Emergency Management Agency's (FEMA) flood level. Consistent with NPS requirements for other lease eligible buildings with first floor elevations below the FEMA flood level, any lessee is required to provide resiliency upgrades including but not limited to raising the

mechanical, electrical and plumbing systems above the flood level, providing resilient finishes, and providing flood insurance sufficient to protect building investments.

As an alternative to demolition, NPS considered and examined the possibility of raising the buildings above the FEMA flood level. The buildings currently sit on brick piers, raising them in place 4-5 feet to set the first floors above the flood elevation would require installation of a full foundation, extension of all utilities to meet the new floor level, and updating/extending the accessible ramps. Additional interior repairs and alterations would also be required for adaptive reuse. While many of the buildings in Fort Hancock are set on raised basements, the WWII temporary barracks buildings were not elevated. It was determined that while the buildings would be preserved, the settings would be modified and the changes would result in an adverse effect.

NPS also considered relocating the buildings to a Fort Hancock location where other WWII barracks previously existed that was outside of the FEMA flood level. NPS as well as AGFA, a consulting party, examined earlier site plans to identify a location with a higher elevation where similar structures existed during WWII. No location meeting these criteria could be identified. One location with a higher elevation was identified; however, this location was still within the flood zone. A scope of work and cost estimate were prepared to evaluate the move of these two buildings to this location. Moving the buildings to a new location requires site preparation; new foundations, site utilities, walkways, landscape etc. as well as the cost to move the buildings and clean up the existing site. Cost estimate to move the buildings to this location within the flood zone was over \$2M per building.

Detailed cost estimates were prepared by the NPS Denver Service Center for the two options indicated above. We agree that these costs seem high; however, these costs are in-line with what NPS is currently paying for work at Sandy Hook for Sandy Recovery projects as well as other NPS projects. In addition, NPS does not have available funding sources that could support implementation of either of the above alternatives.

A consulting party suggested an additional alternative. The consulting party suggested that we convert the structure or structures to shade structures. During a call with the ACHP, NJSHPO, and the consulting party, it was agreed that given the type of construction and the extent of the change required, this alternative would have an adverse effect on the historic district and the ACHP indicated that they could not endorse this approach.

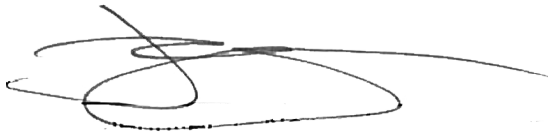
One commenter noted that we repaired other buildings at SAHO whose floor levels are below the FEMA flood level. We acknowledge that we did complete repairs on some structures whose first floors elevations were below the FEMA flood level. One such building is the Firehouse - a masonry structure with concrete slab first floor that provides critical life and safety support for the unit. Investment into this critical structure as well as the adjacent building was not completed without extensive conversations with our NPS Washington office.

As one commenter noted, storm surge and sea level rise will undoubtedly present threats to Sandy Hook and coastal parks nationwide. NPS has design and rehabilitation criteria to ensure resilient investment. Through that lens, many parks like Gateway are now completing critical assessments of their resources and are making similar decisions.

NPS has worked diligently with ACPH, NJSHPO and AGFA to evaluate options for the conservation and adaptive rehabilitation of these two WWII buildings. We acknowledge and appreciate that these are some of the last remaining WWII barrack buildings and that the loss of these building is an adverse effect on the Historic District. Several WWII era supply/storage buildings and barracks will remain within the District. The decision to demolish these historic buildings was not made easily. Unfortunately, there were no viable alternatives.

Thank you again for taking the time to comment and for your interest in our resources.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Jennifer T. Nersesian  
Superintendent