

FINDING OF NO SIGNIFICANT IMPACT

ADAPTIVE USE OF FORT HANCOCK AND SANDY HOOK PROVING GROUND HISTORIC DISTRICT

GATEWAY NATIONAL RECREATION AREA SANDY HOOK UNIT MONMOUTH COUNTY • NEW JERSEY

INTRODUCTION

The National Park Service will rehabilitate and adaptively use 100 nationally significant historic buildings in the Fort Hancock and the Sandy Hook Proving Ground Historic District (District). The rehabilitation and adaptive use will be accomplished through multiple means, by the National Park Service (NPS), by the NPS through Cooperative Agreements, Special Park Use permits, and through leasing authority (P.L. 105-391). Through the National Park Service leasing authority, long-term leases for 36 buildings will be granted to Sandy Hook Partners LLC and 1 building leased to the American Littoral Society in exchange for capital improvement and fair market return. The 37 buildings to be leased are not necessary for park protection, interpretation, visitor enjoyment or administration of the park area. The remaining 63 buildings will be rehabilitated and used for park related management, operations, visitor use or through cooperative agreement with park partners. Park partners, including the American Littoral Society, currently use twenty buildings under cooperative agreements or special use permits. The grounds of the historic district will be rehabilitated to preserve and enhance the character defining features of the landscape while making adaptations for safe visitor use.

Since the establishment in 1972 of Gateway National Recreation Areas Sandy Hook Unit (the park), the condition of the historic buildings in Fort Hancock has deteriorated due to budget constraints. The majority of the historic buildings in the District are in fair to poor condition and require preservation treatment.

In designing this project the park identified seven issues the project should strive to address. These issues are:

- Rehabilitation for continued use or adaptive use of 100 historic buildings (thirty-seven associated with the historic leasing program and sixty-three used by NPS or by park partners through cooperative agreement with NPS);
- Preservation of the historic fabric and character-defining features of all historic buildings in the Fort Hancock and the Sandy Hook Proving Ground Historic District;
- Rehabilitation of the Fort Hancock cultural landscape and preservation of its character defining features;
- Provision for a safe and universally accessible park environment for visitors and partners;
- Preservation of archeological resources;
- Protection of wildlife habitats and special status species, including natural vegetation, piping plover, osprey, and wild wormwood; and
- Provision for an efficient operational environment necessary for current and new uses.

SELECTED ALTERNATIVE

The National Park Service (NPS) has selected the rehabilitation alternative (proposed action) presented in the environmental assessment (EA) for implementation. This alternative is presented in detail in the EA on Pages 9 – 36. Table 1 provides a summary of the 100 buildings included within this project.

Under the Rehabilitation alternative the National Park Service will rehabilitate and adaptively use 100 nationally significant historic buildings of Fort Hancock and the Sandy Hook Proving Ground Historic District (District). The National Park Service will accomplish the rehabilitation and adaptive use either directly through Cooperative Agreements or through National Park Service leasing authority. Forty-three (43) buildings are currently occupied by the NPS for a variety of public use, maintenance, administrative, housing, and education functions. Park partners currently occupy twenty (20) buildings under cooperative agreements. Long-term leases will be granted to Sandy Hook Partners, LLC for 36 buildings and to the American Littoral Society for one (1) building in exchange for capital improvement and fair market return. All 100 structures will be rehabilitated in accordance with the guidelines outlined in the Environmental Assessment, Adaptive Use of Fort Hancock and the Sandy Hook Proving Ground Historic District.

The NPS does not anticipate significant changes in park partners or to the current number of buildings under cooperative agreements. The American Littoral Society is currently under a cooperative agreement and will be changing their agreement to a historic lease. Brookdale Community College, currently located in Building 53 will probably move into a historic lease building. The NPS also plans to continue to use its buildings for administration, maintenance, education, public use, and housing. If in the future, the NPS identified a building or buildings that are not needed for park purposes and decided to add them to a historic lease, an environmental review in accordance with the National Environmental Policy Act, Section 106 of the National Historic Preservation Act, and other applicable laws would be completed.

A Programmatic Agreement between the National Park Service, The New Jersey Historic Preservation Officer, The Sandy Hook Partners, and the Advisory Council on Historic Preservation will guide the rehabilitation effort and insure the work is conducted in accordance with the Secretary's Standards and the conditions outlined in the Environmental Assessment.

Under the rehabilitation alternative, all treatment actions will conform to the Secretary of the Interior Standards for Historic Preservation (Secretary's Standards). In accordance with the Standards, all surviving historic elements that are determined to be contributing to the significance of the Landmark will be repaired and preserved in place. Missing historic features may be replaced when sufficient documentation exists. Features that are determined to not contribute to significance, or are deteriorated beyond repair, could be removed. New features necessary for safety and to support the adaptive use could be added. Examples of added features include exterior fire stairs, handrails, and handicapped accessible lifts.

Also, the Secretary's Standards allow for two philosophically different approaches to

replacement of severely deteriorated or missing elements, or addition of new elements. These are replacement with accurate replicas, or replacement with elements of contemporary design that are compatible with the historic character of the property.

The National Historic Landmark nomination that created the Fort Hancock and Sandy Hook Proving Ground NHL in 1984 identifies two important and very different stories associated with the cultural resources of the District. The first story is that of the Sandy Hook Proving Ground, where the nation's weaponry was tested from 1874 to 1919. The second is the story of Fort Hancock as a military coastal defense post to protect New York Harbor from 1895 to 1974.

With the rehabilitation alternative, the EA presented two different treatment options for the cultural resources of the District that would guide individual treatment decisions and would result in distinctly different appearances of the District. Detailed descriptions of the two options are presented in the EA (pages 12 -15), including examples of specific treatment actions that illustrate the difference between the options.

After considering the impacts and public comment, the NPS selected Option 1. Under this option, the treatment of cultural resources of Fort Hancock and the Proving Ground emphasize the continuum of history throughout the period of significance of the entire National Historic Landmark District. The distinction between the Fort Hancock and Proving Ground zones will be drawn through design of wayside exhibits and way-finding elements that will be developed as part of the interpretation of the site. The park will focus on protecting, maintaining, and repairing in place important cultural resources that contribute to the Landmark's significance as defined in its National Register nomination. When it is necessary to replace important resources that are missing or deteriorated beyond repair, or to make alterations and additions to assure continued use, the new features will be contemporary in design yet compatible with character-defining features of the District. New features will not attempt to replicate historic features but will be differentiated in a way that does not create a false historical appearance. Features that do not contribute to the Landmark's significance could be selectively removed. The physical appearance of the site would provide visitors with an experience of how the landscape evolved during the entire period of significance. The interpretive program would be faced with the challenge of facilitating the visitor's understanding of a complex and somewhat disjointed array of historic resources and new landscape elements. Interpretation of the Proving Ground would be particularly challenging since after its 45-year history it was incorporated into Fort Hancock and over the next 55 years lost much of its own characteristic identify.

Actions relating to the Buildings and Structures

Under the rehabilitation alternative, 100 historic buildings located within the District and the rehabilitation zone will be rehabilitated and adaptively use. Table 1 provides a detailed list of the buildings included in this alternative. In general, the rehabilitation alternative would include the following actions:

- All rehabilitation work will be completed in compliance with the Secretary's Standards (the standards were included as an Appendix in EA).
- All existing buildings will be rehabilitated to comply with current accessibility codes.
- Work will provide for universal accessibility access to the first floor of all buildings. In most locations, access will be provided at grade or by the installation of a code compliant accessible lift.

- All existing buildings will be upgraded to comply with nationally recognized building codes in accordance with 40 USC Section 619. These include National Electric, National Plumbing, and other National Fire Protection Association Codes. The New Jersey Uniform Building Code, Rehabilitation Sub-code will be used as a guide when issues of safety and historic preservation appear to conflict.
- Exterior and interior surviving character-defining features as identified in the “Fort Hancock Rehabilitation Guidelines,” and as amended in consultation with the New Jersey State Historic Preservation Office, will be preserved to the greatest degree possible. All character-defining features will be repaired unless the feature is deteriorated beyond repair or is missing in which case it will be replaced in kind. In general, the character-defining features include: exterior masonry, exterior wood trim, exterior metal cornices, built-in gutters, exterior porches, exterior doors and windows (installation of interior storm windows), interior millwork and cabinetry, interior doors, interior stair assemblies, interior pressed tin ceilings, interior fireplace mantels, and configuration of floor plans.
- Rehabilitation of the Post Chapel, (Building 35) will include reconstruction of its steeple.
- The installation of new utilities within the buildings such as electrical, telecommunications, fire sprinkler systems, and heating, ventilation and air conditioning will be concealed to the greatest degree possible. All fabric will be repaired where required by the installation.
- The Officers Club is unique among Fort Hancock’s historic buildings, in that it has grown and changed over time with additions that are not necessarily compatible with its Second Empire style. This history of change will be incorporated into the adaptive rehabilitation of the structure and character-defining features. Final treatment determinations for the Officers Club will be based on full and complete research and consultation with the State Historic Preservation Office.
- A new maintenance building will be constructed by the NPS to store park maintenance vehicles and equipment during the winter season. The building will be located within the park’s north maintenance area in proximity to the site of three historic warehouse structures associated with the Sandy Hook Proving Ground that are no longer extant. The location, design, materials, size and scale of the building will be compatible with adjacent buildings at the maintenance area in conformance with the Secretary of Interior Standards and in consultation with the State Historic Preservation Office.
- A new structure will replace a missing historic structure on the site of the former Post Hospital. The hospital building, located along Sandy Hook bay at the south end of the parade ground, was lost to a fire in 1985. This structure is an important element of the cultural landscape because it completes the enclosure of the Parade Ground on the bay side. The design of the building will conform to the Secretary of Interior Standards and can be of contemporary design or an accurate reconstruction. The building will be limited to the hospital’s 1902 footprint of approximately 23,369 square feet. Prior to construction, NEPA and NHPA compliance would be undertaken.

Table 1**EXISTING BUILDINGS included in the REHABILITATION ALTERNATIVE**

Building Name	Bldg. #	Date	Historical Use	Present Use	Management	Proposed Use*
Lieutenants Quarters	1	1898	Housing	Museum	NPS	Museum
Lieutenants Quarters	2	1898	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	3	1898	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	4	1898	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	5	1899	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	6	1899	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	7	1899	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	8	1899	Housing	Vacant	Historic Lease	Offices
Captains Quarters	9	1899	Housing	Vacant	Historic Lease	Offices
Captains Quarters	10	1899	Housing	Vacant	Historic Lease	Offices
Captains Quarters	11	1899	Housing	Vacant	Historic Lease	Offices
Commander's Quarters	12	1899	Housing	Vacant	Historic Lease	Hospitality
Captains Quarters	13	1899	Housing	Vacant	Historic Lease	Hospitality
Captains Quarters	14	1899	Housing	Vacant	Historic Lease	Hospitality
Captains Quarters	15	1899	Housing	Vacant	Historic Lease	Hospitality
Lieutenants Quarters	16	1899	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	17	1899	Housing	Vacant	Historic Lease	Offices
Lieutenants Quarters	18	1899	Housing	Park Partner	Historic Lease	Park Partner
Hospital Steward Quarters	20	1899	Housing	Education Partnership	Cooperative Agreement	Education Partnership
2-Family Officers Quarters	21	1939	Housing	NPS Housing	Historic Lease	Offices
Enlisted Barracks	22	1899	Housing	Education Partnership	Cooperative Agreement	Education Partnership
Enlisted Barracks	23	1899	Housing	Vacant	Historic Lease	Offices /Meeting
Enlisted Barracks	24	1898	Housing	Vacant	Historic Lease	Cafeteria /Meeting
Enlisted Barracks	25	1898	Housing	Vacant	NPS	Visitor Center /Museum
Post Headquarters	26	1899	Headquarters	Offices	Historic Lease	Offices
Bachelor Officers Quarters	27	1899	Housing	Vacant	Historic Lease	Offices
Post Guardhouse	28	1899	Post Jail	Museum	NPS	Museum
NCO Quarters	29	1899	Housing	NPS Housing	NPS	NPS Housing
NCO Quarters	30	1898	Housing	NPS Housing	NPS	NPS Housing
Quartermaster Storehouse	32	1898	Warehouse	NPS Operations	NPS	NPS Operations
Bakery	33	1898	Bakery	Vacant	Historic Lease	Kitchen

Fire Station Office	34	1899	Office/ Dormitory	NPS Operations	NPS	NPS Operations
Chapel/Auditorium	35	1941	Chapel	Reception / Events	Historic Lease Shared Use	Reception / Event
Mule Stables	36	1899	Stable	Vacant	Historic Lease	Café/Bar
Pump House	37	1928	Pump Station	Pump Station	NPS	Pump Station
YMCA / Gymnasium	40	1903/ 1941	YMCA/Gym	Gym/U.S. Post Office	Historic Lease	YMCA Recreation
Post Office	41	1941	Post Office	NPS Housing	NPS	NPS Housing
Quartermaster Latrine	44	1899	Latrine	Vacant	NPS	NPS Operations
Shell Warehouse	45	1921	Warehouse	NPS Operations	NPS	NPS Operations
Commissary	47	1900	Storehouse	NPS Operations	NPS	NPS Operations
Warehouse	49	1942	Warehouse	NPS Operations	NPS	NPS Operations
Fire House #1	51	1905	Firehouse	NPS Operations	NPS	NPS Operations
NCO Quarters	52	1905	Housing	NPS Housing	NPS	NPS Housing
Post Exchange	53	1905	Exchange/ Offices	Education Partnership	Cooperative Agreement	Education Partnership
Mess Hall	55	1905	Kitchen/ Dining	Vacant	Historic Lease	Offices
Mess Hall	56	1905	Kitchen/ Dining	Vacant	Historic Lease	Offices
Mess Hall	57	1905	Kitchen/ Dining	Vacant	Historic Lease	Offices
Mess Hall	58	1905	Kitchen/ Dining	NPS Operations	NPS	NPS Operations
Gas Station	60	1936	Gas Station	Vacant	Historic Lease	Post Office
NCO Quarters	64	1907	Housing	NPS Housing	NPS	NPS Housing
Storehouse	65	1905	Storehouse	NPS Operations	NPS	NPS Operations
NCO Quarters	66	1908	Housing	NPS Housing	NPS	NPS Housing
Post Theater	67	1933	Theater	Theater/ Meeting	Historic Lease Shared Use	Theater/ Meeting
Post Exchange/Gym	70	1909	P.X./Gym	Storage	Historic Lease	YMCA/ Recreation
NCO Quarters	71	1909	Housing	NPS Housing	NPS	NPS Housing
NCO Quarters	72	1909	Housing	NPS Housing	NPS	NPS Housing
NCO Quarters	73	1909	Housing	NPS Housing	NPS	NPS Housing
Enlisted Barracks	74	1909	Housing	State Offices	State of NJ	State Offices
NCO Quarters	75	1910	Housing	NPS Housing	NPS	NPS Housing
Fire House #2	76	1910	Fire House	NPS Operations	NPS	NPS Operations
Laundry	77	1940 1941	Laundry	Educational Partnership	Cooperative Agreement	Educational Partnership
Oil and Paint Storehouse	79	1918	Storehouse	Storage	Historic Lease	Commissary

2-Family NCO Quarters	80	1910	Housing	Vacant	Historic Lease	Offices
Lighthouse Keepers Quarters	84	1883	Housing	Education Partnership	Cooperative Agreement	Education Partnership
Barn	85	1910	Barn/Garage	Museum	NPS	Museum
Proving Ground Barracks	102	1909	Barracks	Education Center	NPS	Education Center
NCO Quarters	104	1894	Housing	NPS Operations	NPS	NPS Operations
NCO Quarters	108	1905	Housing	NPS Operations	NPS	NPS Operations
Laundry	113	1905	Laundry	Vacant	NPS	NPS Operations
Officers Club	114	1878	Housing	Vacant	Historic Lease	Hospitality
WWII Barracks	119	1941	Barracks	Vacant	NPS	NPS/Partner Housing
WWII Barracks	120	1941	Barracks	Vacant	NPS	NPS/Partner Housing
Power Plant	124	1907	Power Plant	Storage	Historic Lease	Office/Labs
Motor Shop	125	1907	Motor Shop	NPS Storage	Historic Lease	Office/Labs
Proving Ground Storehouse	130	1907	Maintenance Shops	NPS Operations	NPS	NPS Operations
Proving Ground Shelter House	131	1907	Maintenance Shops	NPS Operations	NPS	NPS Operations
Proving Ground Paint Shop	132	1907	Maintenance Shops	NPS Operations	NPS	NPS Operations
Proving Ground Storehouse	134	1907	Maintenance Shops	NPS Operations	NPS	NPS Operations
Officers Quarters	144	1939	Housing	NPS Housing	NPS	NPS Housing
Officers Quarters	145	1939	Housing	NPS Housing	NPS	NPS Housing
Warehouse	156	1942	Warehouse	NPS Operation	NPS	NPS Operations
Laundry and Latrine	157	1967	Latrine	Restroom	NPS	Restroom
Latrine	300	1940	Latrine	Vacant	NPS	Restroom
Officers Mess	301	19401 941	Kitchen/ Dining	Educational Partnership	Cooperative Agreement	Educational Partnership
Camp Headquarters	302	1940/ 1941	Offices	Educational Partnership	Cooperative Agreement	Educational Partnership
Storehouse	303	19401 941	Storehouse	Educational Partnership	Cooperative Agreement	Educational Partnership
Officers Latrine	304	19401 941	Latrine	Educational Partnership	Cooperative Agreement	Educational Partnership
Dispensary	305	19401 941	Dispensary	Educational Partnership	Cooperative Agreement	Educational Partnership
Sewage Pump Station	306	1940	Pump Station	Vacant	NPS	NPS Operations
Sewage Pump Station	307	1940	Pump Station	Vacant	NPS	NPS Operations

Mess Hall	315	19401 941	Kitchen/ Dining	Educational Partnership	Cooperative Agreement	Educational Partnership
Post Exchange	316	19401 941	Exchange	Educational Partnership	Cooperative Agreement	Educational Partnership
Mess Hall	317	19401 941	Kitchen/ Dining	Educational Partnership	Cooperative Agreement	Educational Partnership
Dispensary	318	19401 941	Dispensary	Educational Partnership	Cooperative Agreement	Educational Partnership
Post Exchange	319	19401 941	Exchange	Educational Partnership	Cooperative Agreement	Educational Partnership
Enlisted Men's Latrine	320	19401 941	Latrine	Educational Partnership	Cooperative Agreement	Educational Partnership
Enlisted Men's Latrine	321	19401 941	Latrine	Educational Partnership	Cooperative Agreement	Educational Partnership
Power Plant	324	1941	Power Plant	Restroom	NPS	Restroom
NCO Quarters	335	1898	Housing	Day Care Center	Cooperative Agreement	Day Care Center
Morgue	326	1905	Morgue	Restroom	NPS	Restroom

* Actual uses of buildings may vary within the proposed mix and ratio of uses

Actions Relating to Traffic, Circulation, and Parking

Adaptive use of the unutilized buildings of Fort Hancock will have an impact on local traffic conditions. A Traffic Impact Study, which evaluates potential impacts of this project was prepared in response to public concerns. The study predicted that by 2008, the scheduled full build out date of Fort Hancock, one intersection (Broad Street in Keyport) in the Route 36 corridor would fall in Level of Service from LOS D to LOS F during the peak afternoon hour on weekday for eastbound traffic. However, the Fort Hancock rehabilitation is not the only potential contributor to the traffic problem at Broad Street. Existing approved planned development projects, along Route 36 and closer to Broad Street, will potentially generate a greater impact on Broad Street than the Fort Hancock development because of their larger contribution of traffic and the remoteness of the Fort Hancock site (17 miles) to the affected intersection.

Further analysis was performed to determine how changes in ratio or percentage of uses would impact the traffic generation model. The ratios of uses has been clarified and codified in the revised draft lease as educational uses shall be greater than or equal to 30% but less than 50% of the total square footage of the premises. Food service and overnight accommodations shall be less than or equal to 30%, general office space shall be less than or equal to 30% and conference and meeting space shall be less than or equal to 40% of the total square footage of the premises. This ratio of uses would generate at the most 225 trips in the AM peak hour trips and 216 trips in the PM peak hour on a typical weekday or less than half the number of trips that would be generated in each peak hour under the previous analysis (664 AM peak hour trips and 460 PM peak hour trips). Therefore, changes in the ratio of uses in the final draft lease would generally result in less delay and improved levels-of-service along the travel paths leading to the project site (Route 36 and Ocean Avenue) than the ratios evaluated in the Traffic Impact Study (Sverdrup, *Technical Memorandum*, June 24, 2003.)

The study also concluded that there would not be a significant diversion of traffic off of the Route 36 corridor and onto local streets because of the proposed project. Since Route 36 intersection performance will not significantly deteriorate, there will be no reason for vehicles to divert to local roadways. Projections of newly generated trips from local streets range from less than one to five percent increase in peak hour traffic which retains an acceptable LOS.

The New Jersey Department of Transportation has determined that mitigation of Fort Hancock related traffic will not be required. The New Jersey Department of Environmental Protection, Land Use Regulation Program reached a similar conclusion in determining that the project is consistent with Coastal Zone Management Rules. The National Park Service has and will continue to work with federal, state and local transportation agencies to alleviate the effects of all park related traffic on the local road network. These activities include but are not limited to, enhanced Traveler Information Systems, expanded ferry and public transit access to the park and replacement of the Highlands Bridge at the entrance to the park.

A physical inventory conducted in 1999 counted 4218 parking spaces at beach and bayside developed areas and 708 spaces in Fort Hancock for a park-wide total of 4926 parking spaces on Sandy Hook. This plan proposes to maintain the number of spaces that existed in 1999 and to add the 110 automobile spaces identified as needed in the 1990 GMP Amendment for the park visitor center to be relocated to Fort Hancock. The adaptive use program requires 665 additional parking spaces in Fort Hancock that will result in a new Fort Hancock total of 1378 parking

spaces. In order to maintain the approved park-wide level of 5,036 spaces within Sandy Hook, spaces will be removed from overflow parking area K and relocated to Fort Hancock.

The uses of the 37 buildings included in the lease are limited to education, office space, and hospitality services. These uses are consistent with the purposes of the park as established by law and with ongoing programs of the NPS and existing park partners. It is anticipated that the buildings will be occupied primarily on weekdays and the remaining number of beach parking spaces will be sufficient to serve visitor parking needs on all but the busiest summer weekends. To continue to provide the overflow parking that was available in parking area K, approximately 650 of the 1378 Fort Hancock spaces will be made available to beach goers on summer weekends. Area K parking ranges from approximately .2 to .4 miles from the nearest beach center (North Beach) and .8 to 1 mile from the Gunnison Beach Center. The new lots will be located approximately .2 to .5 miles from the nearest beach center. Therefore, North Beach users will not be inconvenienced and Gunnison access will be improved. Persons accessing the tip of Sandy Hook on foot will need to walk an additional .2 miles. Parking for special events will continue to be on designated lawn areas around the fort.

At present there are eighteen parking areas dispersed throughout Fort Hancock. Six of these eighteen will be redesigned to either reduce or increase capacity to better accommodate new and existing tenants. Six new areas will be constructed for a total of twenty-four dispersed parking areas. Parking area K will be restored and combined with the natural areas to the north and east to create a cohesive and significant natural zone of high value ecological value.

It was determined that the alternative to provide for several smaller parking areas dispersed around the perimeter of the historic district rather than a large centralized parking area was the only one that would meet the needs of current and prospective tenants and visitors.

Additional actions related to parking and circulation include:

- All new and redesigned lots will be constructed using best management practices to minimize storm-water runoff including; porous surface lots, detention basins, wetland swales, or use of drainage structures. There will be no point source drainage into ponds or Sandy Hook Bay. (ref. NJAC 7:7E-8.7, NJAC 7:8)
- All buildings will have adjacent, universally accessible parking spaces.
- On-street parking will not be allowed, nor will any streets be widened to accommodate any increase in vehicle circulation
- A plan for street, walkway, and parking area lighting will be developed. New lighting will be added where required for safety however designs that focus lighting and minimizes the impact on the night sky and park wildlife will be utilized.
- The intersection of Kearney Road and South Bragg Drive will be reconfigured to improve safety.
- Buses will use the Fort Hancock parking lot, the South Parade Ground Lot, and the Chapel Lot for drop-off; and will then move to existing outlying parking areas.
- Crosswalks between buildings and parking lots will be improved for safety where needed.
- Existing historic walkways will be maintained. Additional walkways to accommodate new circulation patterns created by the adaptive use activities will be added where needed for safety. These will be primarily to connect new parking areas with existing walkways.

Actions Related to Landscapes

A Cultural Landscape Treatment Plan will be developed to guide plantings, small-scale features, walkways, and lighting throughout the rehabilitation area. It will be based on the Historic Landscape Assessment for Fort Hancock (NPS 1994) and in accordance with the Guidelines for the Treatment of Cultural Landscapes (NPS 1996).

Actions Relating to Vegetation

- Approximately 150 street trees that once existed throughout the Fort Hancock and Proving Ground zones will be replanted.
- Turf and foundation plantings could be irrigated using tertiary treated wastewater from the park's treatment plant.
- Use of fertilizer or weed control on lawns will be in accordance with NJ State pesticide laws and the parks Integrated Pest Management plan.
- Foundation plantings will be located in close proximity to historically residential buildings.
- Buildings that were historically service oriented will not have any foundation plantings.
- The height of foundation plantings at the front of Officers' Row Buildings 1-21 will remain at or below the level of the porch floor. Plantings at the sides, corners, and rear may be slightly higher.
- The planting of ornamental annuals and perennials at residences as foundation material was a cultural tradition at Fort Hancock. This practice will continue with only limited restrictions.
- Plant materials used throughout Fort Hancock will be both historically appropriate native species and non-invasive exotic species. A district-wide palette of plant materials that conforms to current NPS policy for cultural landscape management will be developed.
- Historically, climbing vines existed on many Officers' Row buildings. These can be replaced in a way that would not cause future deterioration of the masonry.
- The tennis court adjacent to the Officers Club, (Building 114) will be rehabilitated.

Actions Relating to Small-Scale Features

- Alterations to existing or construction of new walkways needed to accommodate adaptive use will be of one consistent contemporary design that is compatible with the character of the District.
- Streetlights deteriorated beyond repair, missing, or non-historic will be replaced with ones of contemporary design compatible with the character of the District. New streetlights required for adaptive uses will be of the same design.
- Displays of military guns and ammunitions from the earlier eras can be returned, in accordance with the historic landscape plan.
- Planting boxes can be installed on the porch railings at Buildings 1-21. The maximum size of these boxes will be 3 feet x 1 foot x 1 foot.
- New utility boxes will not be located in open-spaces between buildings; rather, they will be located very close to buildings. Whenever possible, utility boxes existing in the middle of open spaces between buildings will be relocated to less intrusive locations close to buildings.
- All dumpsters and trash cans will be located at the rear of buildings, and may be screened using shrubs from the foundation plant palette or other suitable material that is

compatible in appearance and character with existing character-defining landscape features.

- The flagpole in front of Building 102 will be removed as a non-historic intrusion.
- Bollards required by new uses to block vehicles, delineate roadways, and to guide pedestrians will meet federal highway specifications and reflect the historical character of those that existed in large numbers on Barracks' Row, of which two are extant.
- The non-historic and incompatible wood bollards at the South Parade Ground parking lot will be removed as part of the re-design of the South Parade Ground Lot.
- Only one historic street sign is extant. Existing non-historic street signs will remain in place or can be replaced by those with a contemporary design compatible with the character of the District.
- The park will implement a comprehensive sign system for the purpose of providing information to the visitor about the functions or occupants of all buildings in the area of proposed actions. This sign system, required to accommodate new adaptive uses, will be a new landscape feature of the district; and does not have historical antecedents. The system will provide a uniformity of design throughout the district, will limit proliferation of signs, and will provide a design scheme that is compatible with the historic character and identity of an Army post. The sign system will be outlined in a plan submitted to the State Office of Historic Preservation.
- Directional signs will not be permitted except under special conditions.
- Regulatory signs to define travel and parking will be permitted with special approval of the park, and will follow standards of the "Manual on Uniform Traffic Control Devices" and the "Americans with Disabilities Act."
- Temporary, short-term signs for special events and partner identification will be permitted with special approval of the park.
- Long-term portable signs will be permitted with special approval of the park.
- The historic system of identifying buildings, a small numbered plaque on the exterior corner of buildings, will remain. Missing numbers will be replaced with historical replicas.
- Existing historic manhole covers will be preserved and repaired. Covers required for new uses will be differentiated from the historic covers, but will be compatible with the historical character of the district.

Actions Relating to Utilities

- Sustainable design for clean and efficient power will be incorporated in the rehabilitation plan. Natural gas fired co-generation will produce maximum efficiency through dual benefit of thermal and electric production. Electrical components will be designed for energy conservation through management and control systems.
- In order to provide adequate and reliable electrical service to Fort Hancock, existing overhead lines will be placed underground within existing utility corridors. Installation of approximately 14,000 feet of underground electrical and telecommunications conduit (primary/secondary loop) in the southern section of the park will upgrade the electric service. The majority of the lines will be located in the northbound shoulder of the Hartshorne Drive Corridor zone. These lines originate at the main transformer pad at the southern end of the peninsula, and extend north to the Fort Hancock zone.
- Fiber optic telecommunication cables will be installed the entire length of the peninsula using road shoulders, disturbed areas or existing utility corridors. The lines originate in

the vicinity of the Route 36 overpass, and will terminate within Fort Hancock. These new cables will extend to each building using existing utility corridors.

- Where needed, water and wastewater pipes will be replaced in their current locations.
- A natural gas pipeline will be installed to meet the new needs of the adaptive use programs. The alignment of this gas line will follow the alignment of roads, pathways, disturbed areas, or existing utility corridors.

ALTERNATIVES CONSIDERED

In addition to the preferred alternative, a no-action alternative was considered. Under the no-action alternative, the NPS would continue to manage the resources of the District according to its policies, standards and guidelines, and within current budgetary constraints. Treatment of the historic resources would be in accordance with the Secretary's Standards. There would be no full-scale implementation of an adaptive use program as described in the GMP.

The National Park Service would continue with its historic building and cultural landscape maintenance program in the District at the park's current annual base funding level of approximately \$235,000. Additional cyclic maintenance and capital improvement projects would be funded on a project-specific basis through the special, competitive, one-year funding program. The park has received an average annual allocation over the last five years from this one-year program of approximately \$250,000.

Interpretive programs would continue at current levels, with current goals and objectives. The number and type of park partners would continue basically unchanged. Occupation of buildings by existing park partners under existing types of agreements would continue unchanged. The seasonal leasing of eight Officers' Row houses (the other Officers' Row houses do not meet safety codes, due to deterioration) to non-profit organizations would continue for as long as they meet safety codes. These leases required only a minimal maintenance investment in the buildings on the part of the lessees. Within five years certain historic buildings, including the Officers Club (Building 114) would likely deteriorate to a condition beyond repair. Plans to relocate the park visitor center to barracks building #25 would continue.

The NPS also considered other alternatives early in the planning process but dismissed those options from detailed analysis. Dismissed alternatives and the rationale for their dismissal are presented on page 37 of the EA.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying criteria identified in Section 101 of the National Environmental Policy Act (NEPA) to each alternative considered. In accordance with NEPA, the environmentally preferred alternative would best: (1) fulfill the responsibility of each generation as trustee of the environment for succeeding generations; (2) assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradation, or other undesirable and unintended consequences; (4) preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice; (5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing

of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

After reviewing the potential impacts to resources and visitors and after incorporating measures into the Rehabilitation Alternative (preferred alternative) to avoid or minimize impacts, the preferred alternative achieves the greatest balance between assuring a safe, healthful, and aesthetically attractive environment; accommodating a wide range of uses without degrading the environment or posing risks to health and safety; preserving and enhancing important aspects of a diverse, national heritage; and achieving a balance between resource protection and visitor use.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

Consideration of effects described in the EA and a finding that they are not significant is a necessary and critical part of this FONSI as required by 40 CFR 1508.13. Criteria of significance are defined in 40 CFR 1508.27 to consider direct, indirect, and cumulative impacts and the context and intensity of impacts. Mitigation measures described in the EA and incorporated into the preferred alternative, including post-construction monitoring and documentation, are generally required by laws, regulations, or NPS policies and are adopted by this decision.

Context

This measure of significance considers the setting within which an impact was analyzed in the EA, such as the affected region, society as a whole, affected interest, and/or a locality. The preferred alternative affects only the immediate local area, in terms of resources, employees, visitors, and/or businesses. Therefore, any possible impact is limited to this level of least significance.

Intensity

This measure of significance refers to the severity of impacts, which may be both beneficial and adverse, and considers measures that would be applied to minimize or avoid impacts. The intensity of an impact, if any, is discussed below for each stated criteria.

As defined in 40 CFR 1508.27, intensity is determined by evaluating the following criteria:

Degree of effect on public health or safety. The preferred alternative will stop the deterioration of lead paint in buildings, which present safety issues to people. The rehabilitation and continued maintenance of the building will mitigate this existing health and safety issue.

In addition, the anticipated slight increase in tenant activity could increase public safety issues in the Fort Hancock area. However, since the increase in tenant visitor activity is expected to be slight the safety issues are anticipated to be negligible.

Degree of effect on unique characteristics of the potentially affected area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The impacts of the project are analyzed in detail in the environmental consequences section of the EA. The project will not impact prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas.

The project will result in impacts to historic and cultural resources. All rehabilitation actions will be executed in accordance with the Secretary of the Interior Standards for Rehabilitation. The collective consequence of the Rehabilitation Alternative on the physical condition of the landmark property will be long-term, major and positive. There will be a substantial and highly noticeable change in the group of elements that contribute to the significance of the historic district. There will be major improvements to the condition of buildings and ornamental vegetation; there will be minor improvements to utilities and small-scale features. This proposal for adaptive use will reverse a long-standing trend in the maintenance of the property that has led to a deterioration of the physical condition of resources. The overall environmental consequence of the actions proposed under the Rehabilitation Alternative is that the sense of historical character and identity of the National Historic Landmark property will be improved, and maintained into the foreseeable future. The positive effects will be of greater consequence on the property's ability to convey its significance as a military post, than will the actions having negative effects. The positive effects will result in a major, long-term, substantial, and highly noticeable improvement to character-defining features, involving a large group of contributing elements.

Consideration of the National Register "aspects of integrity" supports this perspective. The location of affected elements will be the historic location for all actions. Few, if any, of the results will impede the visitor's ability to understand why the property was created or why some event occurred. Consequences of actions will not significantly degrade the overall design of the district. Spatial relationships between major features will be retained. Visual rhythms stemming from vehicle and pedestrian circulation features, and ornamental vegetation planting patterns, will remain unaffected. Principal and important common open-spaces, delineated by the alignment and layout of buildings, roads and trees, will remain open. Important views to and from buildings, and across open spaces, will not be obstructed, while vistas down roads and between tree allees will be improved. Alterations to the original architectural design of buildings will be required to accommodate new uses; but because interior and exterior motifs will be retained, and there will be no major structural alterations, the overall and collective architectural design of the district will continue to convey its historical identity and character. There will be no adverse impacts to the setting of the historic district. There will be minimal change to materials and finishes, and construction techniques will be preserved. Where possible, the materials used for replacement of deteriorated or missing features will match the old. Alterations and new additions will not destroy historic materials, and the materials used in new work may be different from, yet compatible with, old materials. The choice of new materials will reflect the preferences of the US Army Quartermaster Corps, which created the property. Evidence of workmanship contained in character-defining features will be preserved during repair and replacement procedures. Evidence of existing workmanship will not be reduced significantly. The overall expression of the historic sense of the period of significance, the feeling of the place, will be enhanced by actions taken under the Rehabilitation Alternative. Collectively, the proposed actions will stimulate and foster the emotional aspect of the visitor experience, the sense visitors have of the Fort Hancock zone as the administrative center of an army coastal defense post, and the feeling of the Proving Ground Zone as the first and sole United States

heavy weapons testing center for forty-five years. The physical features of the National Historic Landmark remain sufficiently intact for the property to convey its association with significant historic events – and will remain so after the execution of the actions proposed under this alternative. Once again, the positive effects will outweigh the negative effects.

The rehabilitation alternative will not significantly affect sensitive ecological areas within the park because the project involves the use or reuse of existing buildings, roadways and utilities. However, parking in Fort Hancock will be expanded to accommodate the weekday use by new tenants. 665 new parking spaces will be needed in addition to the 708 existing spaces. This will be accomplished by creating several small parking lots and expanding existing lots within the fort. These new lots will be located on previously developed or disturbed lands. This will result in the loss of some vegetation or potential wildlife habitat. To offset this loss and to insure there is no net increase of parking spaces within the park, an equal number of beach parking spaces in area K will be eliminated. Parking area K will be replanted with native vegetation to restore natural habitat. A habitat restoration plan will be developed in consultation with NJDEP and USFWS as well as interested park partners. It is anticipated that the relocation of parking spaces will be beneficial in the long term because the park will be able to restore a large parcel of land adjacent to existing natural habitat. The K lot field is of great importance to migrating bird populations along the Atlantic flyway because it is located at the tip of Sandy Hook providing resting and feeding areas for birds before or after crossing the water. This habitat will be more valuable to wildlife than the existing small, disconnected parcels that will be disturbed to improve parking in Fort Hancock. Additionally, parking spaces will be used more efficiently with Fort Hancock occupants using the spaces on weekdays leaving them available for beach visitors on weekends. Some Fort Hancock parking lots will in fact be closer to the most popular beach areas than existing spaces in parking area K.

The degree to which effects on the quality of the human environment are likely to be highly controversial. Deciding if a topic is “controversial” stems from the section of the Council on Environmental Quality (CEQ) regulations discussing terminology. Specifically, 40 Code of Federal Regulations Sec. 1507.27(b)(4) identifies that this factor is one, amongst many, which help agencies determine whether or not their action would “significantly” effect the environment. This provision has been interpreted by case law decisions that emphasize the issue is not whether the project proposal is generally a topic of controversy, but whether there is a dispute about the impacts or effects of the project.

In this case, the project has been vigorously supported by a clear majority of those commenting and has been vigorously opposed by others. While this mixture of public support and opposition may be considered a controversy, it is not a controversy about the effects of the project. Some of the project opponents have raised concerns about the effects of the project, principally whether it would induce traffic at specific locations outside the park. However, the fact that there will be some traffic impacts from the project does not seem to be in dispute.

The analysis determined that by the year 2008, at one intersection, on Route 36 located 17 miles from the project, there would be decrease in Level of Service from LOS D to LOS F during the peak afternoon hour on weekday for eastbound traffic. In sum, while some members of the public will probably continue to oppose the project, there do not seem to be any major areas of disagreement about the effects or impacts of the project.

The degree to which the possible effect on the human environment is highly uncertain or involves unique or unknown risks. During the preparation of the environmental assessment, including the scoping, no highly uncertain, unique or unknown risks were identified.

The degree to which the action may establish a precedent for future actions with significant impacts. The preferred alternative does not set a precedent for future NPS actions with potentially significant impacts or represent a decision in principle about future considerations. Future NPS actions will be evaluated through additional, project-specific planning processes that incorporate requirements of NEPA, other federal laws, and NPS policies.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into smaller parts. As described in the EA, the preferred alternative will affect park resources. Although some resources will be adversely affected by the project, the preferred alternative will generally result in long-term, beneficial effects. A variety of past, present and reasonably foreseeable actions have affected resources in the park. Although adverse impacts of the preferred alternative will contribute a negligible to moderate increment to cumulative impacts, this will not result in significant cumulative impacts. (See “Cumulative Impact” sections of the revised EA under “Environmental Consequences”).

The degree to which the action may adversely affect items listed or eligible for listing in the National Register of Historic Places, or other significant scientific, cultural or historic resource as indicated under Section 106 of the National Historic Preservation Act.

As described in the EA the purpose of this project is rehabilitate 100 historic buildings that will result in long-term major beneficial effects to historic buildings. The project will however result in some long-term, moderate, adverse impacts to cultural resources.

The installation of utility boxes, signs, and bollards in the district will be perceptible and measurable; and will constitute the introduction of a small group of non-historic intrusions into the historic scene. The actions will alter the character-defining feature collectively known as small-scale features. The installation of these new features (signs, bollards, and utility boxes) will adversely affect the integrity aspect of “setting.” The new sign system will introduce a prominent new “design” aspect into the district.

If implemented, irrigation of the lawns in the district will result in long-term minor adverse impact on the character of the District. Turf was never irrigated during the historic period and will change the historic character of the turf areas of the District in the summer.

Spatial organization and visual quality are of great importance to the design and setting of the district. The construction of approximately 665 parking spaces in the district will have a long-term, moderate impact on these landscape components.

The degree to which the action may adversely affect an endangered or threatened species or its critical habitat. The National Park Service consulted with the U.S. Fish and Wildlife Service (USFWS) and the New Jersey Division of Fish, Game and Wildlife (NJDFGW) concerning threatened and endangered species. The USFWS identified the piping plover as the only federally listed species in the project area. The NPS determined that the project was not likely to

adversely affect the plover. The USFWS concurred with the determination based on seasonal restrictions for construction in the utility corridors and that the redevelopment will not result in visitor use increases in areas used by piping plovers. The NJDFGW identified that the threatened osprey and the endangered piping plover were the only state listed species in the project area. An osprey management plan for the park was developed with approval by NJDFGW. The plan outlines steps to deter osprey from nesting on building chimneys and insures osprey have adequate alternative nesting sites.

Whether the action threatens a violation of Federal, State or local law or requirements imposed for the protection of the environment. The preferred alternative violates no federal, state, or local environmental protection laws.

Consideration of Impairment Pursuant to National Park Service Policies. In addition to determining the environmental consequences of the preferred and other alternatives, NPS policy (*Management Policies 2001*) requires analysis of potential effects to determine whether or not actions would impair park resources. Policies clarifying terms pertaining to “impairment,” as well as a prohibition on impairment and what constitutes impairment, are found in Management Policies 2001 (Sections 1.4.2 through 1.4.7), which are summarized below.

The fundamental purpose of the National Park System, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values.

However, the laws do give the NPS the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the NPS the management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the NPS must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise.

Prohibited impairment may include any impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may constitute impairment. An impact would be more likely to constitute impairment to the extent it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents.

Because there will be no major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the National Recreation Area; or (3) identified as a goal in the park’s general management

plan or other relevant NPS planning documents, the preferred alternative will not result in impairment of resources or values at the park. In short, rehabilitation of historic structures through execution of a lease will not result in degradation of the purposes and values of the park.

PUBLIC INVOLVEMENT

Scoping for this project resulted in the identification of issues that were addressed in the EA. Impact topics derived from these issues were described in detail in the Issues and Impact Topics sections in the EA.

In 2002, the park hosted four public open houses to provide information on the project and obtain input from the public. These open houses were held on February 28, March 2, April 20 and June 1. Members of the park staff were available to discuss the project, answer questions and receive public comment. Approximately 1,200 individuals attended the open houses. In addition, public meetings were held on April 20 and June 1, 2002. The public meetings provided an opportunity for the public to provide oral comments. The meetings were documented by a court reporter.

The EA was made available for a 120-day public review and comment period. Copies of the EA were distributed to the park's mailing list and various regulatory agencies. The EA also was placed at local libraries and was available on the Internet. The public comment period on the EA closed on June 15, 2002.

One Hundred and Seventy Three (173) original letters were received on the Fort Hancock Environmental Assessment. Of those comments:

72	42%	support the project as presented in the Environmental Assessment
32	18%	support the project but expressed concerns about the plan
20	12%	oppose the plan for rehabilitation and adaptive use
31	18%	expressed concerns without stating support or opposition
18	10%	expressed no opinion (e.g. asked to be added to mailing list)

Two (2) petitions were received with 201 and 158 signatures. Both petitions specifically oppose "commercialization" of the park.

Two (2) sets of form letters were received with 85 signers endorsing the plan and 13 signers questioning the impact of relocated parking areas and additional visitors on wildlife habitat.

Two public meetings were held with the first on April 20th, 2002 where 44 individuals spoke. Of those speakers:

21	48%	support the project as presented in the Environmental Assessment
14	32%	support the project but expressed concerns about the plan
6	14%	oppose the plan for rehabilitation and adaptive use
3	7%	expressed interest/concerns without stating support or opposition

Twenty-six (26) individuals spoke at the second public meeting held on June 1, 2002. Of those speakers:

6	23%	support the project as presented in the Environmental Assessment
17	65%	support the project but expressed concerns about the plan
3	12%	oppose the plan for rehabilitation and adaptive use
0	0%	expressed interest/concerns without stating support or opposition

The NPS received approximately 22 written comments from public officials and groups. By a wide margin these letters supported the NPS’s proposed action. The State of New Jersey, Department of Environmental Protection (NJ DEP); the National Trust for Historic Preservation; Preservation New Jersey, Inc.; Rutgers University, Institute of Marine and Coastal Studies (Rutgers); the University of Pennsylvania/Wharton School, Sol C. Snyder Entrepreneurial Center; the Monmouth County Planning Board; Northern Monmouth Chamber of Commerce; the Township of Middletown Environmental Commission; and the Township of Middletown Landmarks Commission all endorsed the proposed action and the use of a public/private partnership.

The National Parks Conservation Association (NPCA) and New Jersey Senator Joseph M. Kyrillos, Jr., wrote in support of the proposed action. Sierra Club agreed that the Fort Hancock buildings were deserving of rehabilitation and the American Littoral Society (ALS) recognized that with no federal funding available the adaptive reuse plan may be the last chance to save a Sandy Hook resource for which the Society possesses “a great affection.”

The Two Rivers Council of Mayors and Bayshore Council of Mayors, who represent all of the park’s neighboring communities in Northern Monmouth County, each voted to endorse the Fort Hancock adaptive reuse plan.

The ALS and Preservation New Jersey, Inc., also note that the proposed plan can be implemented without infringing upon or impacting natural resources. Rutgers’ comments recognize that the many unique habitats of Sandy Hook, set next to one of the busiest harbors in the world, combine in a fantastic real-world laboratory of enormous significance. Rehabilitated Fort Hancock and Proving Ground buildings can become a world-class education and research center. The National Oceanic and Atmospheric Administration, National Marine Fisheries Service, James J. Howard Marine Sciences Laboratory (at Sandy Hook) also wrote in support of initiatives which are conducive to active marine research and education in fisheries, marine and environmental sciences.

NJ DEP (SHPO), in its comments, recognizes a fact that the NPS has endeavored to stress throughout the public process: The presence of people living and working in the buildings is essential to the efficient preservation of the buildings; the ongoing use of the buildings creates an immediate need to make repairs, rather than putting them somewhere on a long list of maintenance needs. As a result small problems are fixed before they become big problems.

Many commenters recognized a related matter: In order to generate revenue to care for the buildings over the life of the lease, the leasing effort has to be economically viable.

No public official or group wrote in opposition to the proposed action, but many, like Congressman Frank Pallone, Jr., expressed concern over, or offered suggestions about, one or

more aspects of the plan. Indeed many that supported the plan expressed concerns or offered suggestions about one or more aspects of the plan.

The National Park Service initiated a supplemental Traffic Impact Study on November 1, 2002. The study was released for public review March 27, 2003 and the comment period closed on April 30, 2003. A public meeting was held on April 12, 2003 where twenty-four (24) individuals spoke.

15	62%	support the project as presented in the Environmental Assessment
3	12%	support the project but expressed concerns about the plan
6	25%	oppose the plan for rehabilitation and adaptive use
0	0%	expressed interest/concerns without stating support or opposition

Twenty (20) original letters were received during the supplemental comment period.

6	30%	support the project as presented in the Environmental Assessment
11	55%	support the project but expressed concerns about the plan
3	15%	oppose the plan for rehabilitation and adaptive use
0	0%	expressed interest/concerns without stating support or opposition

Comments generally reflected the comments received during the previous comment period. The scope of the Traffic Impact Study was criticized as being too narrow not analyzing enough intersections at not a sufficient distance from the park.

Attachment A provides a summary of the comments received and the NPS response to the comments.

CONSULTATION AND COORDINATION

The following agencies were contacted and/or consulted during preparation of this EA:

U.S. Fish and Wildlife Service, New Jersey Field Office (USFWS). The NPS informally consulted the Endangered Species Division (Annette Scherer) on endangered and threatened species, and the Wetlands Branch (Tom McDowell) on wetland issues. An April 11, 2000, a letter received from USFWS specified that the piping plover was the only species of federal concern in the project area and described methods to ensure that the proposed action is not likely to adversely affect that species. The NPS obtained additional information concerning endangered species in the project area from the USFWS's Internet site at '<http://endangered.fws.gov/statl-r5.html>' and a variety of other Internet sites, including sites posted by the USFWS, U.S. Geological Survey's Biological Resources Division, and the New Jersey Department of Environmental Protection (NJDEP). The NPS submitted a copy of this EA to the USFWS and requested concurrence with the NPS's determination that the proposed action is not likely to adversely affect the piping plover. Section 7 review was completed on May 14, 2003

New Jersey Office of Historic Preservation (NJSHPO). The NPS met with representatives from NJSHPO (Dan Saunders and Kurt Leisure) on two separate occasions. The first meeting, held in December of 2000 at NPS offices at Sandy Hook, introduced the Rehabilitation Alternative to NJSHPO. At the request of NJSHPO, a second meeting was held on January 8 and 9, 2001, that took the form of a walk-through of the existing buildings, and a walk around the

cultural landscape. *The Fort Hancock Rehabilitation Guidelines* list of character-defining features for each building was reviewed and amended as necessary.

Advisory Council on Historic Preservation (ACHP). NPS informally contacted the ACHP to introduce the Rehabilitation Alternative to the Council. A representative of the Council, Martha Catlin, attended the site walk-through with NJSHPO on January 8 and 9, 2001. Attendance by ACHP was informal and not considered a formal review by the Council.

New Jersey Department of Environmental Protection, Land Use Regulation Program (NJDEP/LURP). The NPS contacted the NJDEP/LURP to discuss wetland issues and compliance with the Coastal Zone Management Act, as well as state laws and regulations. While evaluating a different project at the park, representatives from the NJDEP/LURP met with NPS personnel on April 14, 2000, to identify jurisdictional wetlands in the project area. The NPS obtained additional information, including New Jersey's Coastal Zone Management Plan, from NJDEP/LURP's Internet site at '<http://www.state.nj.us/dep/landuse/coast/coast.html>'. The park submitted a copy of the EA and Traffic Study to the NJDEP/LURP and requested concurrence with the NPS's determination that the proposed action is consistent with New Jersey's Coastal Zone Management in accordance with the Coastal Zone Management Act.

New Jersey Department of Environmental Protection, Division of Water Quality, Bureau of Point Source Permitting (NJDEP/DWQ). The NPS contacted the NJDEP Bureau of Point Source Permitting, (Jim Grob) concerning the use of treated water to irrigate turf in the area of proposed action. NJDEP representative noted that they are encouraging such use under appropriate circumstances. NJDEP representative sent NPS a document titled "Technical Manual for Reclaimed Water for Beneficial Reuse." Information regarding best management practices for stormwater runoff was obtained from the NJDEP website.

New Jersey Division of Fish, Game, and Wildlife (NJDFGW). The NPS contacted the Endangered and Non-game Species Program (Dave Jenkins) on endangered and threatened species issues of concern to the state. According to their representative, the only species of state concern in the project area are the threatened osprey and endangered piping plover. In addition, the NJDFGW provided methods to ensure the proposed action is not likely to adversely affect osprey. The NPS submitted a copy of this EA to the NJDFGW for review and comment. Conservation measures recommended by the NJDFGW were incorporated into the park osprey management plan.

CONCLUSION

The preferred alternative does not constitute an action that normally requires the preparation of an environmental impact statement (EIS), and the preferred alternative will not have a significant effect on the quality of the human environment. The adverse environmental impacts will be negligible to moderate. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. In addition, no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence have been identified, and implementing the preferred alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, the NPS has determined the preferred alternative will not have a significant effect on the human environment, that an EIS is not required for this project, and that an EIS will not be prepared.

Recommended:

Superintendent
Gateway National Recreation Area

Date

Approved:

Northeast Regional Director

Date