



State of New Jersey

James E. McGreevey
Governor

Department of Environmental Protection
Natural and Historic Resources, Historic Preservation Office
PO Box 404, Trenton, NJ 08625
TEL: (609) 292-2023 FAX: (609) 984-0578
www.state.nj.us/dep/hpo

Bradley M. Campbell
Commissioner

September 8, 2004
HPO-I2004-68
04-0895-2

James Ott, Director of Public Works
Department of the Army
Headquarters, U.S. Army Garrison Fort Monmouth
Fort Monmouth, New Jersey 07703-5101

Dear Director Ott:

Thank you for your letter of July 15, 2004 which included a copy of the draft Programmatic Memorandum of Agreement (PMOA) for the RCI project at Fort Monmouth. A review of our prior Section 106 consultation on projects at Fort Monmouth reveals both successes and failures. The U.S. Army has made consistent and fairly successful efforts to identify architectural resources at Fort Monmouth. There have been efforts to identify archaeological resources at Camp Evans, including as you will recall, the discovery of an intact Native American human burial that has been preserved in place. There has been virtually no archaeological testing at the Main Post or at Camp Charles Wood. The 1996 ICRMP estimated that 3% of the base had been investigated for archaeological resources. I am not aware that any survey has been undertaken at the Main Post or Camp Charles Wood since 1996. Archaeological testing is a recommendation of the current ICRMP. I have reviewed the plans of prior use of the 800 area and remain of the opinion, as expressed in item #3 of my April 8, 2004 letter to you, that the 800 area needs to be evaluated in a Phase 1 survey by a professional archaeologist. The archaeological survey can be conducted after the PMOA has been signed, but must be accomplished prior to ground disturbance in the 800 area.

While the Army has had some success in identifying historic properties, efforts to consult on the effect of U.S. Army projects at Fort Monmouth have largely been non-productive. There is no existing Programmatic or Memorandum of Agreement for projects at Fort Monmouth so project review must proceed on a case by case basis. In some cases, Section 106 was never initiated, most recently in the case of the pedestrian bridge over Oceanport Creek, despite the fact that the bridge crosses into the boundary of the Main Post Historic District as defined in the 1996 ICRMP. In other cases, letters were sent to this office (projects in the Russell-Carty and Goesslin areas and at Gibbs Hall) We responded with written requests for information to enable an evaluation of the projects effects, but that

information was never forwarded to this Office and the projects apparently proceeded without HPO or ACHP consultation comments. While I am unsettled by the Army's mixed record at project review, I am gratified by recent actions at Camp Evans to ensure that the buildings will be in good condition when transferred to Wall Township/Info Age as part of the Base Closure.

The 1993 ICRMP (received with your letter and draft PMOA) is a five year plan intended to cover through FY 2007. There are a number of recommendations in the ICRMP and the PMOA which will ensure appropriate consultation to protect historic properties. First and foremost, is that Fort Monmouth must hire as staff, or as a contractor, a Cultural Resource Manager (as defined in the PMOA) who meets the Professional Qualifications for Historic Architect, Archaeologist. I propose that the PMOA be amended to require that individual's contact information and documentation that the individual meets the relevant standards be submitted to this office. If the qualified CRM leaves or is no longer able to review projects, Fort Monmouth will need to notify HPO and submit projects to HPO for review until such time as a new qualified CRM is in place and HPO has been notified of the individual's name and contact information. The PMOA we are finalizing with Picatinny Arsenal includes such a stipulation.

Based on the documentation contained in the ICRMP and on the site visit by Dan Saunders of my staff, I concur that the RCI housing in the areas identified on the maps as Hemphill, Megill, and North Pinebrook are not eligible for the National Register of Historic Places. Further, while the Gosselin area remains a grouping of contributing buildings within the Main Post Historic District, the interiors of the housing at Gosselin have been substantially altered. Alterations to the interiors of the houses at Gosselin therefore will not need to be reviewed against the Standards. Any changes to the outside of the buildings at Gosselin will need to be reviewed. Projects affecting both the interior and exterior of Russel-Allen and Russel-Carty will need to be reviewed.

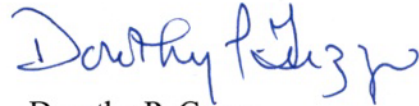
I have listed some specific comments on the PMOA below:

1. Your letter references the Residential Communities Initiative (RCI) but the draft PMOA attached to your letter is open ended agreement covering all projects at Fort Monmouth. Given the unique nature of the RCI project, it needs to be handled separately from the Fort Monmouth projects. The final PMOA must include the maps of the project areas and a list of the historic buildings and landscapes covered by the RCI. We are fully prepared to do separate very similar PA on notification that Fort Monmouth has hired a qualified professional pursuant to the RCI PA.
2. The PMOA states "no Native American Tribal governments have been identified as potential consulting parties." The ICRMP identifies six Indian Tribes/groups in Appendix III. If the six Indian Tribes/groups have not been notified of the proposed PMOA, it is essential that you do so as soon as possible.
3. The ICRMP submitted with your letter of April 8, 2004 is dated 1993 and is intended to cover through FY07. The PMOA needs to have a Sunset clause, I suggest that the PMOA sunset be arranged to coincide with the time period covered by each ICRMP. We could provide for renewal of the PMOA with the concurrence of both parties.
4. The PMOA needs to be signed by the RCI Lessee.

5. Neither the ICRMP nor the draft PMOA include a Standard Operating Procedure for curation. I suggest that an SOP for curation be appended to the PMOA. I have attached a sample for your review.
6. Given that Fort Monmouth will have a qualified professional reviewing projects at the base, the list of exempt activities (meaning exempt from NJ SHPO and ACHP review) can be deleted from the PMOA. (The list may be a useful starting point for a subsequent PMOA to cover Fort Monmouth's other projects.)

If you have any questions, please contact Dan Saunders at (609) 633-2397, staff reviewer for this project

Sincerely,



Dorothy P. Guzzo
Deputy State Historic
Preservation Officer

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If a recognized Native American group is identified that will have an on-going interest in Arsenal activities that may affect Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony, then the Arsenal may choose to execute a Comprehensive Agreement (CA) with the tribe. A draft CA is included as Attachment 4 to this SOP.

The point of contact for this SOP is Ms. Kelly Ridgel, Tel. (973) 724-8014, email: kridgel@pica.army.mil

Standing Operating Procedure #9

Curation of Cultural Materials (36 CFR 79)

All cultural materials that have been collected during archaeological inventory within Picatinny should be curated in compliance with 36 CFR Part 79 (Curation of Federally Owned and Administered Archaeological Collections). Picatinny should develop a curation agreement with a facility meeting the standards cited in 36 CFR Part 79. Assistance in preparing a curation agreement and evaluating the appropriateness of a repository can be obtained from the HQDA Federal Preservation Officer (FPO), the New Jersey SHPO, the New Jersey State Museum, or the National Park Service.

A curation facility is specifically designed to serve as a physical repository where artifacts are sorted, repackaged, assessed for conservation needs, and then placed in an appropriate, environmentally controlled storage area. Proper curation also includes a review and update of all paper records. An important component of artifact curation is the selection of artifacts for site-specific reference collections. Artifact data is entered into a database, which is an important management and research tool. The overall goal of the Federal curation program, as set forth in 36 CFR Part 79, is to ensure the preservation and accessibility of artifacts for use by members of the public interested in the archaeology of the region.

Archaeological material has been collected at Picatinny and the possibility exists that artifacts will be collected in the future. AR 200-4 requires the Installation Commander to ensure that all archaeological collections and associated records, as defined in 36 CFR Part 79.4(a), are processed, maintained, and preserved in accordance with the requirements of 36 CFR Part 79. Currently, the installation does not have an artifact repository that meets the standards specified by 36 CFR Part 79.

The point of contact for this SOP is Ms. Kelly J Ridgel, Tel. (973) 724-8014, email: kridgel@pica.army.mil

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