United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
United States Custom House
200 Chestnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:

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NOV 01 2011

Memorandum

To: Keeper, National Register of Historic Places

From: for Regional Director, Northeast Region Michael A Caldwell

Subject: Request for Determination of Eligibility, North Beach Island Cottages in Chatham: Sampson-Bloomer, Crowell, Crowell Shed, Dubis, Pratt-Carroll, and Lumpkin Cottages Barnstable County, Massachusetts

Pursuant to the Code of Federal Regulations Part 36 §63.2 Determination of Eligibility process, I am requesting a determination regarding the eligibility for listing in the National Register of Historic Places for the North Beach Island Cottages, owned by the National Park Service (NPS) and located within Cape Cod National Seashore (CCNS). At issue is whether the buildings, constructed in 1992, are historic and eligible for listing in the National Register of Historic Places. Massachusetts State Historic Preservation Officer (MASHPO) and the National Park Service (NPS) do not agree on this question. The NPS finding that the cottages are not eligible for listing in the National Register is supported by the Northeast Regional cultural resource staff and the Superintendent of Cape Cod National Seashore.

North Beach Island is a rapidly eroding sand island that became separated from the mainland at Nauset Beach in 2007. This 2007 land separation follows several breaks and changes to North Beach and the Chatham Inlet over the centuries. The island is currently eroding at approximately 80 feet per year on the ocean side, and is fully exposed to the forces of winter storms. There are 13 structures on the island, including six structures owned by the NPS and others that are in private ownership. The six NPS-owned structures consist of five cottages and one shed. All six structures are new construction replacements built in 1992 following 1991's "No Name Storm" that destroyed the six earlier structures.

Because of the accelerated rate of erosion, in August, 2011 CCNS formulated plans to demolish the six NPS-owned structures to prevent them from being destroyed by storms and washing into Pleasant Bay. On September 9, 2011 the NPS requested concurrence from the MASHPO that demolition of the six structures would not affect historic properties. In correspondence dated October 7, 2011, MASHPO was unable to concur with the NPS determination, even though the MASHPO had previously concurred in 1998 that four of the six properties were ineligible.

The position of the Northeast Regional Office staff is that:

- While MASHPO drew similarities between the National Register-eligible Dune Shacks of Peaked Hill Bars Historic District in Provincetown and the North Beach Island structures, the properties are very different. The dune shacks are eligible under Criterion A, B, and C. They are significant for their association with the historic development of art and literature in America; for their representation of a rare, fragile property type; and for their association with the poet Harry Kemp. The North Beach Island structures do not possess any significant associations with notable events, people, distinctive architecture or significant information potential

- The North Beach Island structures do not represent a rare property type; there are many rustic camps, both regionally and nationally. The notable local example is the camps on Sandy Neck Beach, Barnstable County, Massachusetts.

- MASHPO also drew similarities between the North Beach Island structures and the 2010 Determination of Eligibility (DOE) for the Mitchell River Bridge in Chatham, namely 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 bridge is also identified as being perhaps the last remaining bridge of its kind in the United States. None of the North Beach Island structures retain any original material and they were not built to reconstruction standards utilizing the same blueprints of the originals. In addition, unlike the bridge, the cottages are not rare surviving examples of a particular type of structure like the drawbridge is, and because they are less than 50 years old, would not meet the requirements of Criteria Consideration G.

- MASHPO notes that the dune shacks have been "additive, evolving structures...moved back from the shoreline and raised up on piers in response to rapid accretion and erosion of the sand." Unlike the dune shacks, the North Beach Island cottages are complete reconstructions and therefore, their integrity is compromised.

- There is no evidence that the North Beach Island structures are associated with events that have made a significant contribution to the broad patterns of our history; nor are they associated with the lives of persons significant in our past.

- Between the 1998 MASHPO concurrence that four of the structures are ineligible for listing in the National Register and today, no new information regarding the significance of the properties has emerged.

- In 2007 two unoccupied North Beach structures owned by the NPS (Achilles and Scott Cottages) were threatened by erosion. To avoid having them wash into Pleasant Bay, the NPS formulated plans to demolish them. MASHPO concurred that no historic properties would be affected by the demolitions. The Chatham Historical Commission was copied

on all related correspondence regarding the demolitions, and did not comment or express concern. The NPS demolished the cottages. The Achilles and Scott cottages were similar in their history and use to the six structures that are now considered for demolition. The only difference between the two sets of structures is that Achilles and Scott were not occupied.

- The Massachusetts Historical Commission's Reconnaissance Survey Town Report of 1984 makes no mention of the North Beach cottages, and the 1991 Chatham Survey, consisting of documentation prepared for the Massachusetts Historical Commission, makes only minor, passing references to the camps. It appears that at that time the town did not consider the former camps to be significant cultural resources.

Background

Primitive camps were probably built on North Beach as gunning shacks as early as the early 1890s (Chatham Survey, 1991, page 21). Originally built to store fishing or hunting gear, eventually "the shacks were added on to and used as places to retreat from the elements and to spend the nights to get an early start on the next day." ("*Drifting Memories*," Frances L. Higgins, 2004, page 9)

Over time, the properties changed hands, and use evolved from hunting to recreation. Because the structures did not meet the criteria in the legislation establishing Cape Cod National Seashore, they were purchased by the NPS. Former owners received a financial settlement and reservations of use and occupancy to continue to use the camps for 25 years. The NPS assumed management of the properties when the reservations expired in the late 1990s and early 2000s, and the former owners were issued Special Use Permits to occupy the properties on a year-to-year basis. Located just one mile from Chatham, and within clear view of the mainland, the structures are used as seasonal second homes and weekend recreational destinations for annual permit holders and their families and friends.

We are attaching all the relevant information for your review, including the following:

Assessment of Actions Having an Effect on Cultural Resources, dated October 27, 2011.

Letter from Caroline D. Hall, Assistant Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation, to George E. Price, Jr., Superintendent of the Cape Cod National Seashore, dated October 17, 2011.

Letter from John M. Fowler, Executive Director, Advisory Council on Historic Preservation, to Jon B. Jarvis, Director of the National Park Service, dated October 17, 2011.

Letter from George E. Price, Jr., Superintendent of the Cape Cod National Seashore, to Brona G. Simon, State Historic Preservation Officer, Massachusetts Historical Commission, dated September 9, 2011.

Letter from Brona G. Simon, State Historic Preservation Officer, Massachusetts Historical Commission, to George E. Price, Jr., Superintendent of the Cape Cod National Seashore, dated October 7, 2011.

Letter from Donald Aikman, Vice Chairman of the Chatham Historical Commission, to George E. Price, Jr., Superintendent of the Cape Cod National Seashore, dated September 20, 2011.

Letter from Kirk Ranzetta, Senior Project Scientist of Cardno ENTRIX, to George E. Price, Jr., Superintendent of the Cape Cod National Seashore, dated September 11, 2011.

Determination of Eligibility, Mitchell River Bridge, Chatham, MA, dated October 1, 2010.

Letter from George E. Price, Jr., Superintendent of the Cape Cod National Seashore, to Brona G. Simon, State Historic Preservation Officer, Massachusetts Historical Commission, dated January 8, 2008, with concurrence signature, Brona G. Simon, dated January 29, 2008.

Letter from George E. Price, Jr., Superintendent of the Cape Cod National Seashore to Brona G. Simon, State Historic Preservation Officer, Massachusetts Historical Commission, dated March 26, 2007, with concurrence signature, Brona G. Simon, dated May 8, 2007.

Letter from George E. Price, Jr., Superintendent of the Cape Cod National Seashore to Brona G. Simon, State Historic Preservation Officer, Massachusetts Historical Commission, dated August 6, 2007, with concurrence signature, Brona G. Simon, dated August 23, 2007.

Letter from Maria Burks, Superintendent of the Cape Cod National Seashore, to Judith McDonough, State Historic Preservation Officer, Massachusetts Historical Commission, dated July 7, 1998.

Letter from Judith McDonough, State Historic Preservation Officer, Massachusetts Historical Commission, to Maria Burks, Superintendent of the Cape Cod National Seashore, dated August 6, 1998.

Higgins, Frances L.
2004, Drifting Memories, The Nauset Beach Camps on Cape Cod, South Beach Orleans, North Beach Orleans.

Thank you for your consideration in this matter. If you need additional information please contact George Price, Superintendent, Cape Cod National Seashore at 508-957-0739.

Attachments

cc:
Brona Simon, Massachusetts State Historic Preservation Officer
Katry Harris, Advisory Council on Historic Preservation
Caroline D. Hall, Advisory Council on Historic Preservation
John M. Fowler, Advisory Council on Historic Preservation
Ken Salazar, U.S. Secretary of the Interior
Jon Jarvis, Director, National Park Service
Vick Knox, Associate Director, Park Planning, Facilities and Land, National Park Service
Wampanoag Tribe of Gay Head (Aquinnah)
Mashpee Wampanoag Tribe
National Trust for Historic Preservation
U.S. Senator John Kerry
U.S. Senator Scott Brown
U.S. Representative William Keating
State Representative Sarah Peake
State Senator Dan Wolf
Jill R. Goldsmith, Chatham Town Manager
Florence Selden, Chair, Chatham Board of Selectmen
Robert D. Oliver, Chairman, Chatham Historical Commission
Chatham Historical Society
Cape Cod National Seashore Advisory Commission
Ted Keon, Town of Chatham Director of Coastal Resources
Chatham Conservation Commission
Kirk Ranzetta, Cardno ENTRIX
William Hammatt
Robert Long, Town of Chatham North Beach Advisory Committee
Duane Landreth, Esq., LaTanzi, Spaulding & Landreth, P.C.
Loris VanLare
Christopher Lindquist
Donna and Gladys Lumpkin
Jean Allison Young
Roger and Susan Carroll
North Beach Island Residents (Brown/Smith Camp, Long Camp, Adams Camp, Gould/Schluter Camp, Carroll Camp, Dubis Camp, Bloomer Camp, Homer/Kelly Camp, Kaup/O'Connell Camp, Lumpkin Camp, Crowell Camp)
Naomi Turner, David Veach
Robin Dubis-Zibrat
Robert Crowell
Arthur Bloomer
Sally and Donald Gould, Jr.
R. Anzalone