US Army Corps
of Engineers
Huntington District

Environmental Assessment

Jenkins House Preservation Actions

R.C. Byrd Lock and Dam Replacement Project
Cabell County, West Virginia

May 2008

EA CERTIFICATION SHEET
FINAL ENVIRONMENTAL ASSESSMENT
Jenkins House Preservation Actions
R.C. Byrd Lock and Dam Replacement Project
Cabell County, West Virginia

The project is authorized under Section 548 of the Water Resources Development Act (WRDA) of 2000 and Section 301(a) of WRDA 1986 with funds appropriated by the Supplemental Appropriations Act, 1985.

The purpose of the proposed preservation action is to arrest ongoing degradation of historic fabric and features at the Jenkins House in accordance with the Secretary of Interior's Standards for Treatments of Historic Properties.

As a result of the 30-day agency and public review period comments were received from the State Historic Preservation Office (SHPO), members of the Greenbottom Society, and other members of the public. The public and agency comments related primarily to design details and other issues beyond the scope of preservation planning and therefore did not alter the conclusions presented in the draft EA. All public and agency comments have been address and there are no unresolved issues regarding the proposed project.

The following Staff/Team Members have reviewed the EA and Finding of No Significant Impact (FONSI) and have determined that they are in compliance with National Environmental Policy Act (NEPA) guidance.

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FINDING OF NO SIGNIFICANT IMPACT

Jenkins House Preservation Actions

R.C. Byrd Lock and Dam Replacement Project
Cabell County, West Virginia

1. Members of my staff have prepared an Environmental Assessment to evaluate the potential environmental impacts of preservation actions and flood risk reduction measures proposed at the Jenkins House. The house is located within the Greenbottom Mitigation Area of the Robert C. Byrd Lock and Dam Project in Cabell County, West Virginia. The purpose of the proposed preservation action is to arrest ongoing degradation of historic fabric and features at the Jenkins House in accordance with the Secretary of Interior's Standards for Treatments of Historic Properties. The Seattle District's Center of Expertise for the Preservation of Historic Buildings and Structures provided technical support in this effort and preparation of the Preservation Plan. Authorization for preservation activities is through Section 548 of the Water Resources Development Act (WRDA) of 2000 and Section 301(a) of WRDA 1986 with funds appropriated by the Supplemental Appropriations Act, 1985.

2. The Proposed Action prescribes measures to reduce water penetration and damage via removal of paint from exterior masonry, removal of the modern addition to facilitate overall re-pointing of brick and foundation mortar, replacement/repair of windows, dormer removal and re-roofing, utility upgrades, ventilation improvements, and documentation of features in anticipation of possible future restoration. Floodproofing measures were considered but not included in the proposed action due to potential adverse affects to the National Register values of the historic property.

3. The Preserve in Place alternative (Proposed Action) and the "No Action" alternative were the only alternatives carried forward for detailed evaluation. Given the nature of preservation work, involving typical home improvement and home repair activities, potential resource impacts and subsequent evaluation was limited The following pertinent conclusions resulted from the evaluation:

    a. Environmental Considerations. The Huntington District has taken reasonable measures to assemble the known or foreseeable impacts of the proposed action to the human and natural environment. Primary impacts would be improvements to and stabilization of original historic fabric and features on the Nation Register listed structure and removal of lead-based paint. Worker safety consideration for lead-based paint removal are to be addressed through incorporation of proper handling, containment and disposal methods into design and implementation specifications in accordance with 29 CFR 1926.62 and other applicable standards. All potential adverse impacts of the proposed action are insignificant and should last only a few months longer than the implementation period.

Potential adverse effects to the National Register listed Jenkins House are to be minimized by the selection of proper preservation treatments and methods that offer repair, protection and preservation of original building fabric and features.

The No Action alternative would not have any direct impacts to the historic structure or to the surrounding environment. However, it would not seek to meet identified preservation goals to the fullest extent practical.

b. Social Well-Being considerations. Social well-being is considered through incorporation of appropriate worker safety standards and temporarily limited public access during construction activities. The human community would benefit from the proposed action through improved interpretation of the site and a more historically accurate portrayal of the property to the period of significance (1835-1860).

c. Other Public Interest Considerations. There has been no opposition to the proposed action expressed and there are no unresolved issues regarding the implementation of the project.

d. Section 106 National Historic Preservation Act. The proposed action is in compliance with the National Historic Preservation Act (Section 106; 32 CFR 300). The State Historic Preservation Office (SHPO) and interested public have been involved throughout preservation planning. The proposed action has been developed to preserve important National Register values of the Jenkins House, and directs preservation actions in accordance with the Secretary of the Interior's Standards for Treatments of Historic Properties. No adverse impacts to historic properties are anticipated.

e. Section 176 (c) Clean Air Act. The proposed action has been analyzed for conformity pursuant to regulations implementing Section 176 (c) of the Clean Air Act. It has been determined that the typical home repair activities involved in the proposed action will not exceed de minimis levels of direct emissions of a criteria pollutant or its precursors and are exempted by 40 CRF Part 93.153.

f. Other Pertinent Compliance. The Proposed action is also in compliance with the Executive Order (EO) 11988 (Floodplain Management), EO 11990 (Protection of Wetlands), and EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations).

4. I find the Proposed Action (Preserve in Place Alternative) has been planned in accordance with current authorization as described in the Environmental Assessment. The Proposed Action is consistent with National policy, statutes and administrative directives. This determination is based on thorough analysis and evaluation of the proposed action and the alternative course of action. In conclusion, I find the preservation treatments to be applied to the Jenkins House as planned in the Proposed Action will have no significant adverse effect on the quality of the human and/or natural environment.

27 MAY, 2008
Date

Dana R. Hurst
Colonel, Corps of Engineers
District Engineer

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1.0 Introduction

This Environmental Assessment (EA) considers the potential environmental impacts of the proposed preservation actions at the General Albert Gallatin Jenkins House, a property listed in the National Register of Historic Places. The Jenkins House is located in Cabell County, West Virginia as a part of the Greenbottom Mitigation Area set aside to mitigate ecological impacts of the Robert C. Byrd Lock and Dam Replacement effort. The Jenkins House was acquired incidentally with tracts necessary for ecological mitigation by the Huntington District U.S. Army Corps of Engineers (Corps) in 1989. Congress has directed the Corps to preserve and restore the Jenkins House in accordance with the Secretary of the Interior's Standards, though no funds were attached to this directive. Congressionally appropriated funds are currently available for activities described within the original project authorization documents, which includes preservation but not restoration. As a result, the current planning effort considers preservation activities only. According to Federal historic preservation statutes, "preservation" includes planning measures and specifying actions to ensure the retention of original fabric, features, design, materials, and craftsmanship of existing historic properties.

The Huntington District has worked in conjunction with the Seattle District's Center of Expertise for the Preservation of Historic Buildings and Structures (CX) to identify, evaluate and prioritize preservation actions necessary to sustain the integrity, original fabric and character of the Jenkins House while avoiding, minimizing or providing mitigation for any adverse effects to the historic structure or to surrounding archaeology. As presented to the public during the 24 April 2007 public scoping meeting, primary concerns for preservation of the structure were related to water penetration and potential flood damage. Other preservation concerns included utility upgrades, cyclical maintenance issues, and documenting and repairing moldings, features and finishes. The Preservation Plan (Appendix A) recommends both immediate and long-range preservation treatments guided by Section 106 of the National Historic Preservation Act (NHPA). This EA evaluates proposed preservation actions and their potential effects on the human environment as prescribed by the National Environmental Policy Act (NEPA).

During early planning stages, floodproofing measures were given primary consideration as a means to protect federal investments in preservation and potential future restoration actions at the Jenkins House. However, this proved problematic as floodproofing actions introduce elements and impose interventions that would significantly affect the National Register values of the Jenkins House (both to the historic structure and setting, and to archaeological resources). Investigation of floodproofing guidance revealed an exemption for floodproofing requirements of historic structures (44 CFR Sec. 59.1). This exemption allows substantial improvements to be made to historic structures located in the 100-year floodplain without imposing potentially adverse floodproofing alterations to structures listed in the National Register of Historic Places. This guidance facilitated consideration of preservation measures that did not include floodproofing actions. The Corps' Federal mandate is to apply preservation standards that meet the intent of Section 106 of the NHPA. The potential for adverse effects to the historic structure and landscape by any preservation measures is considered inconsistent with presiding preservation objectives.

1.1 Project Location and Description

The Jenkins House is located in a 836 acre wetland mitigation area of the Robert C. Byrd Lock and Dam along the Ohio River in Lesage, West Virginia (see Figure 1). The nineteenth century house and related features are part of a plantation established by the William Jenkins family in 1825. William Jenkins built the house around 1835 and it has been modified since that time. The house is now known as the Albert Gallatin Jenkins house for a son who inherited it and part of the plantation holdings on the death of his father, William Jenkins in 1859. The period of significance that guides this evaluation is derived from Albert Jenkins' association with the property from 1835-1860. Albert Jenkins served as a general in the Confederate Army during the Civil War and died from wounds received in battle.

Plantation features once a part of the Jenkins House property, contribute to its significance and help convey its historic use as an agricultural plantation along the Ohio River. A number of archaeological sites located within the immediate and surrounding area are also part of the property's history. Archeological investigations and historic photographs have revealed the locations of former outbuildings including an office, summer kitchen, privy, and walkways connecting these features to the house entrances. Other features, now absent, included a barn and slave quarters. The location, orientation and use of some former outbuildings and other elements of the agricultural setting are important contributors to the National Register values of the historic property.

The Huntington District leases this area, known as Greenbottom, to the West Virginia Department of Natural Resources (WVDNR) for wetland and wildlife management. The West Virginia Division of Culture and History (WVDCH) currently sub-leases a four acre portion of the tract that includes the Jenkins house and a prehistoric/historic archaeological site. The WVDCH operates the Jenkins House as a house museum, open to the public.

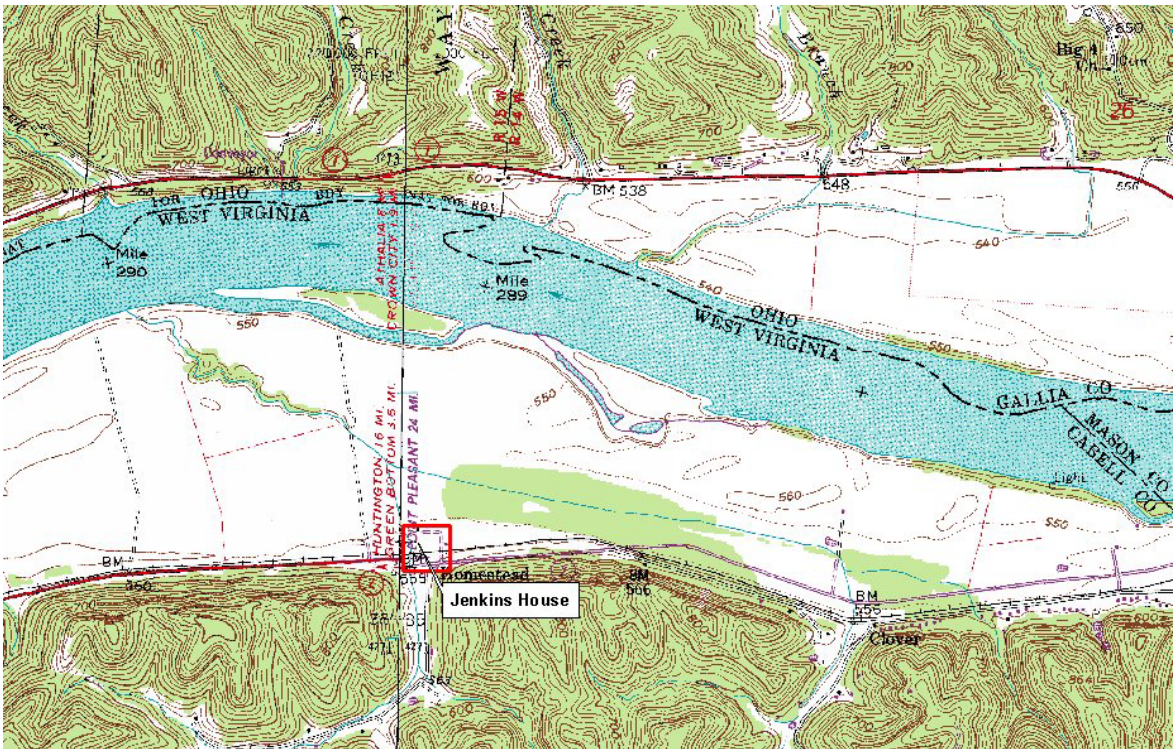

Figure 1. Location Map. USGS topographic map showing Jenkins House location along the Ohio River.

1.2 Authority

The Robert C. Byrd Dam Replacement Project (formerly Gallipolis Lock and Dam) was authorized under Section 301(a) of the Water Resources Development Act (WRDA) of 1986 (Public Law 99-662) with funds appropriated by the Supplemental Appropriations Act, 1985 (P.L. 99-88). The project resulted in two additional lock chambers to the original dam structure, and efforts to mitigate the environmental consequences. The plan for environmental mitigation included acquisition of the LeSage/Greenbottom Swamp. Section 30 of the WRDA 1988 (P.L. 100-676) prevented the Corps from conveying the Lesage/Greenbottom Swamp property to the State of West Virginia.

Preservation activities at the Jenkins House were authorized through Section 548 of the WRDA of 2000 (P.L. 106-541), which amended WRDA 1988. Section 548 of the WRDA 2000 provides authorizing language for the Corps to "ensure the preservation and restoration of the structure known as the 'Jenkins House' located within the LeSage/Greenbottom Swamp in accordance with standards for sites listed on the National Register of Historic Places." There were no funds appropriated for the WRDA 2000 directive to preserve and restore and it was not linked to the original authorization/appropriation. Although it is a clear directive to preserve and restore, only preservation was in the WRDA 1986 Mitigation plan; therefore, funding is only available for current preservation efforts. Congressionally appropriated funds are available for implementation of preservation measures until September 2009, when the funding for the R.C. Byrd Lock and Dam Replacement efforts are scheduled to be closed.

Along with the conclusion of Preservation Planning efforts in November 2007 came the passing of a new WRDA. WRDA 2007 passed and provided the directive to restore and reconstruct with the availability of originally appropriated funds. Planning for restoration and reconstruction would be based upon availability of funds and future budgeting cycles that coincide with the recently approved legislation.

1.3 Public and Agency Involvement

A public scoping meeting was held on April 24, 2007, to invite the public and interested agencies to participate in the planning process and provide comments. The 30-day public scoping period ended May 24, 2007. Comments received during the public meeting and scoping period are intended to help determine the scope of issues to be addressed and to identify significant issues related to the proposed action. During the scoping process, 57 written comments were submitted and 11 oral statements were given (see Appendix C). A summary of these comments and guidance on how they are addressed is also provided in Appendix C. The essence of public comments related primarily to preservation issues and planning objectives presented in the public meeting (see Table 1). Issues that pertain to preservation were addressed in the Draft EA and Preservation Plan (Appendix A), restoration and other non-preservation issues have been documented and summarized for consideration during appropriate future planning efforts.

Table 1. Summary of Public Scoping Comments and Identified Issues

	Scoping Issues	Public Comment
1	Flood Damage	• Raise all 3 floors (include basement) • Raise entire site (10 ft fill) • Do nothing
2	Water Penetration	• Moisture penetration issues encouraged by adjacent wetland • Elevated water table from wetlands contributes to moisture damage • Drainage concerns surrounding house and nearby creek need addressed
3	Cyclical Maintenance	• Proper cyclical maintenance is needed to ensure preservation of structure
4	Document and Repair	• Identify and document original features to compensate potential loss and to guide restoration when needed
5	Historical Associations	• Concern for loss of NR listing status
6	Archaeology	• Additional testing around house entries could reveal evidence for porches • Site burial would preclude complete understanding of outbuilding features
7	Wise Investment	• Preservation plan mindful of potential Restoration (use of methods/materials)
8	Public Benefit / Interpretation	• Consider ADA access • Full site interpretation (people, periods, wildlife)
9	Non-Preservation / Other	• Restoration/Reconstruction • Remove wetlands • Consider available utilities/amenities • Keep Visitor Center in mind

As presented during the public scoping meeting, primary concerns for preservation of the structure related to water penetration and flood damage. Other preservation concerns included utility upgrades, cyclical maintenance issues, and documenting and repairing moldings, features and finishes. Public scoping comments highlighted the need to identify sources of water penetration and damage to ensure application of appropriate preservation treatments.

A copy of the Draft EA was made available to all affected Federal and State agencies, the general public and other interested parties for a 30 day review period as required by the National Environmental Policy Act (NEPA). A public meeting was held on 10 April 2008 to orient the public with the Draft EA and facilitate public and agency comments. During the public review period, 7 written comments were submitted and 8 oral statements were given. Public comments are presented in Appendix F, followed by the Corps' response to comments in Appendix G. Public comments relevant to Preservation and the Proposed Action, focused on details to be

decided during the design and construction phase of the project. Other comments pertaining to future restoration, reconstruction and interpretation of site features are documented for consideration during future planning efforts. There are no unresolved issues as a result of the public comments.

1.4 Background Investigations

The following investigations were performed during development of the EA and the Preservation Plan to document existing conditions and identify areas of preservation concern and potential procurements:

- Groundwater monitoring survey
- Climatology/Meteorological Consideration
- Masonry Condition Assessment
- Detailed Documentation of Structure

A groundwater survey was conducted by credentialed Geophysicists to determine the extent of groundwater effects from adjacent wetlands to the structure (USACE 2007). The static groundwater level near the Jenkins House was determined from groundwater wells and soil boring data. The elevations of surface and groundwater table that were measured, as well as the level of significant capillary moisture, were well below (~5.0 feet below) the basement floor elevation. Given the marked distance between the top of the rise in capillary action and the basement floor elevation, geotechnical investigators concluded that the wetlands have not contributed to any ground-water related moisture problems at the Jenkins House.

The WV State Climatologist was contacted to provide technical guidance on the potential for adjacent mitigation wetlands to aggravate mold and mildew conditions due to changes in atmospheric moisture. Further consultation with the Ohio State Climatologist, a Boundary Layer Meteorologist, was recommended by the WV State Climatologist. Boundary Layer Meteorology is a specialty that focuses on the air layer near the ground that is affected by diurnal heat and moisture or its movement and transfer among surfaces. Based upon consultation with the Ohio State Climatologist, it was determined that the prevailing winds in the area are southwesterly. With drier air from the south hills prevailing at the house site, any air moisture from adjacent wetlands located to the north and east of the Jenkins House would be directed away from the house with no measurable effect on the structure. Because of the relationship of the house with respect to prevailing winds, no further investigation was warranted.

A Masonry Condition Assessment was conducted by U.S. Heritage Group to determine the moisture content of brick, mortar and foundation stones, to assess potential moisture related damage due to rising damp or capillary action, feasible paint removal methods, and determine original mortar components and appropriate replacement mortar formulation. Though the face brick appeared to be performing well beneath the paint layers, the masonry assessment recommended complete paint removal from the brick to prevent future entrapment of water that can contribute to masonry deterioration. Complete re-pointing of the brick was recommended due to mortar deterioration and past re-pointing with inappropriate materials (cement-based mortar). Use of modern mortar in exposed foundation stones was noted, and complete re-pointing was recommended to preserve original foundation stones and restore the proper moisture balance between stone and mortar. These and other conclusions from the masonry

assessment were considered in the Preservation Plan (Appendix A) and were utilized to identify actions for preserving masonry elements from water damage, as described therein.

It was recommended that building elevations and architectural features be inventoried and captured to scale as measured drawings, and in high resolution photographs. This documentation should be based in general upon standards of the Historic American Building Survey (HABS). The purpose of this recordation is to document existing features for future preservation and restoration efforts as needed. This HABS based survey was completed simultaneous to preparation of the EA and Preservation Plan.

The Corps has undertaken numerous other studies over the past two decades that have produced useful information for development of the Preservation Plan. In 2003, the District contracted for a geophysical survey of the area immediately surrounding the Jenkins House. This noninvasive survey identified the location of nearby structures and features (Kerr 2002). [Archaeological excavations were then undertaken to document these structures and features (Updike 2005)]. The kitchen structure and a privy were fully excavated and a probable slave quarters foundation and cellar adjacent to the kitchen was partially exposed. The excavations also documented portions of the office foundation, a brick walk and garden gateway.

The District undertook an intensive effort to locate any documents that would add to our knowledge of the Jenkins House and other structures at the plantation. This archival study failed to locate any previously unknown letters, writings, photographs, publications or other sources (O'Bannon 2005). In 2006, the District contracted for a Historic structure report on the Jenkins House to document the original fabric and changes that have occurred through time (Tuk, et al. 2006). This report utilized earlier reports commissioned by the District and by other interested parties.

2.0 Purpose and Need

The purpose of the project is to identify, evaluate and prioritize preservation treatments to be applied to the Jenkins House in order to sustain the existing form, integrity, original fabric and character of the house from the period of significance (1835-1860). The process of identifying, evaluating and prioritizing preservation actions is guided by Section 106 of the National Historic Preservation Act (NHPA), its implementing regulations and other federal standards. Due to the technical nature of this process, the Seattle District's Center of Expertise for the Preservation of Historic Buildings and Structures (CX) was engaged to develop the Preservation Plan. As identified in the Preservation Plan (Appendix A), preservation needs for immediate action are those primarily related to weathering and ongoing water penetration. Common infiltration points for water access include exterior surfaces of masonry, roof, dormers and windows. Potential options to reduce the risk of flooding were also considered. The following section describes preservation objectives developed to aid in the identification and evaluation of appropriate preservation treatments.

2.1 Preservation Objectives

Preservation objectives, taken from the Preservation Plan (Appendix A), were guided by the Secretary of Interior's Standards. These standards are to be followed by any Federal agency when considering actions to properties listed or eligible for listing on the National Register of Historic Places in accordance with Section 106 of the NHPA; the Secretary of Interior's Standards are subsequently referenced by enabling legislation for preservation. Potential preservation treatments were developed and assessed based upon their ability to meet the following objectives:

1) Expends funds solely on the preservation of existing original fabric by arresting ongoing or imminent degradation.

2) Reverses a non-historic intervention that has compromised the physical status and longevity of the house, and in turn supports historic integrity.

3) Provides an accurate record of the building's design, materials and features in anticipation of future loss and the need for replacement or replication.

4) Does not jeopardize National Register values or interpretation of archaeological features.

5) Does not compromise other historic fabric or that of associated historic properties, or foreclose on long-range preservation or possible restoration goals.

6) Does not introduce non-contributing elements or characteristics to the site and landscape that have the potential to further erode the building's integrity of setting, association, and feeling.

7) Stabilizes significant character defining features and fabric that may be repaired or restored, should additional historical documentation or funding become available.

8) Maximizes[1] available funding according to preservation standards, while avoiding or minimizing invasive treatments.

2.2 National Register Status (Constraints)

The National Register values of the Jenkins House and its associated former outbuildings and landscape features were given primary consideration during the formulation of preservation treatments and floodproofing options. When evaluating potential preservation treatments it is assumed that actions fully support the buildings historic integrity and maintain National Register status. Key features that contribute to the National Register values of Jenkins House include the house itself, the woodland landscape along the Ohio River bottom, and spatial relationships and associations with former outbuildings.

[1] "Maximize" - Applies available funding in a manner that supports the building's historical values, without introducing invasive treatments that, while potentially protective, stand to adversely affect other aspects of the building's material character and setting.

The Federal style architecture and simple features of the Jenkins House define its historic character. Foundations now buried once supported component buildings including the summer kitchen, office, and privy which all have ties to the house that demonstrated their use in times past. They demonstrate the property's historic use as part of the working plantation. General Albert Gallatin Jenkins is recognized as a regional military figure associated with the house, and the property retains features associated with the events of his life. All of these elements reinforce the historic period and patterns that maintain the plantation character. A complete description of these values and their role in the properties significance is more fully described in Section 2 of the Preservation Plan (Appendix A).

The cumulative effect of past actions has altered the historic setting to a degree that any further adverse effects must be discouraged to avoid potential loss of overall site integrity, interpretive accuracy, and National Register listing. For example, the immediate landscape of the house has already been compromised by a later era railroad and highway, by the modern management of wetland environments, and by the loss of key outbuildings that illustrated the full measure of plantation activity.

3.0 Alternatives Considered (Initial Screening)

Preservation alternatives were formulated with the aid of public and agency input, site and structural assessments, floodproofing guidance exclusions for historic structures, and National Register values of the Jenkins House as described in the following subsections.

3.1 Preservation Plan Formulation

The Preservation Plan (Appendix A) formulates potential preservation treatments to address both immediate and long-range preservation needs for the Jenkins House, based upon the preservation objectives and evaluation criteria outlined for compliance with Section 106 of the NHPA. Preservation treatments that can be immediately implemented under the current preservation action, are summarized herein for the purposes of consideration under the National Environmental Policy Act (NEPA). Other long-range and ongoing preservation considerations such as cyclical maintenance and site planning issues are presented only in the Preservation Plan.

The proposed preservation action considered in this EA is comprised of treatments to remedy water penetration and other areas for immediate preservation action as identified in the Preservation Plan. Primary areas subject to water penetration include masonry (brick, stone, and mortar), gabled dormers, roofing, and windows. The Preservation Plan describes the historical significance of each feature, considers options to address preservation needs, and recommends appropriate preservation treatments. A summary of recommended treatments to be included as a part of the proposed preservation action is as follows:

- Gabled Dormers – removal of non-original dormers is proposed to reduce water infiltration by removal of this common entry point that is not historically accurate and allows for more authentic interpretation of the structure.

- Roofing – replacement of the aging asphalt roof is proposed as one of the most valuable preservation actions which could provide continued protection to the structure from weathering and stem potential future water infiltration. Use of materials that provides long-life durability with similar visual qualities (color, texture and dimension) to original wood shingles is proposed.

- Masonry (brick, stone and mortar) – total re-pointing of brick, sandstone foundation and partial rebuilding of chimneys with historically appropriate lime-based mortar is proposed to stabilize these elements and stem ongoing damage from past interventions with inappropriate materials. Paint removal is also proposed to facilitate re-pointing of brick, prevent moisture entrapment and incidentally return the building's exterior to the original un-painted brick appearance.

- Garage/Addition – removal of the non-original garage/addition is proposed to facilitate access to the east side of the building for complete re-pointing of brick and foundation stones, and incidentally removes an element not associated with the historic period of significance.

- Windows – a detailed inventory of window conditions is proposed to be followed with replacement and/or repair of deteriorating elements with historically appropriate materials and design.

- Ventilation (Moisture Infiltration) – the addition of discrete ventilation openings are proposed to address the structure's ability to maintain proper moisture balance between the interior and exterior in response to seasonal and diurnal changes in temperature and moisture.

- Utility Upgrades (Safety and Hazard Considerations) – attention to relevant electrical system upgrades identified by a certified electrical engineer is proposed to ensure proper function of electrical systems. (This includes minor actions to upgrade or replace circuit breakers, outlets, etc.) Removal of non-historic exterior electrical fixtures is proposed to stop water from migrating into masonry.

The above summary of recommended preservation treatments is based upon the Preservation Plan's assessment of options to address preservation needs for each feature. Collectively, these comprise the proposed preservation action for the Jenkins House. Possible floodproofing measures that may be incorporated as potential components (or "options") to the proposed preservation action are considered in the following section. These options are outlined in greater detail in this EA, as they have the greatest potential to adversely affect the historic structure and are not actions that would typically be proposed under preservation.

3.2 Consideration of Flood Risk Reduction Options

During project scoping, floodproofing was proposed as an essential component of preservation in order to protect federal investments in preservation and potential restoration actions. The emphasis on floodproofing was based on conformance with the National Flood Insurance

Program (NFIP) guidance for protecting substantial improvements made to structures in the 100-year flood plain. However, thorough examination of this guidance revealed an exemption from floodproofing requirements for historic structures, providing that the proposed improvements do not affect the structure's historic designation (44CFR Sec. 59.1).

The exemption to the substantial improvements requirements is applicable to the Jenkins House, according to FEMA guidance as it meets the following guidelines:

1) The building is a historic structure
2) Proposed preservation activities would maintain the historic status of the structure
3) All possible flood risk reduction measures are considered

Though exempt from floodproofing requirements, potential flood risk reduction measures presented to the public were carried forward for consideration. The option not to floodproof the Jenkins House was added to the array of options to be considered. The history and risk associated with potential flooding at the Jenkins House is considered along with the building's historical context and National Register values.

The first floor of the Jenkins House is at 558.8 feet above mean sea level (amsl) and sits approximately 1.2 feet below the hundred year elevation (560 feet amsl). There is a relatively low risk (1% chance) that the Ohio River would reach this elevation on any given year. Historic hydrologic records show that the Jenkins House has experienced three major floods from 1935 to present. Water levels in the vicinity of the Jenkins House were high enough to have penetrated the first floor elevation in 1937, 1943 and 1948. Earlier flood events have also been reported; however U.S. Geological Survey (USGS) hydrologic data is not available prior to 1935.

The flood event that occurred in 1937 is considered to have been a 500 year event, with the potential to occur once every 500 years or a 0.2% chance it could occur in any given year. Approximately 7 feet of standing water would have been in the first floor of the house during the 1937 flood event. Less than 10 years later, another significant flood event occurred in 1943. The Ohio River reached elevations that would have resulted in 1 foot of flood water standing in the first floor. In 1948 the Ohio River reached the 100-year elevation, again placing water in the first floor of the Jenkins House. Since that time, the Jenkins House has experienced additional high water events but none high enough to reach the first floor or 100-year elevations. Based upon hydrologic predictions, there's an approximate 1.4% chance the Ohio River would reach the first floor elevation of 558.8 feet amsl in any given year.

Damageable materials (such as wood, insulation and electrical work) are those susceptible to water damage in the event of a flood. Non-damageable materials (such as stone and concrete) can withstand flooding without damage. In the case of the Jenkins House, preventing loss of historic fabric is the primary preservation concern. Due to original historic fabric that was replaced following past flood events, there is little concern that additional fabric could be lost to a 100-year flood. Damageable historic fabric that remains in the first floor includes wood floors, moldings and trim; we assume all plaster on the first floor was replaced at some time between 1913 and the 1940s, following the historic flood events. Some of the fireplace surrounds, door casings and moldings were also likely replaced with materials that conform to the architectural

design of the 1930s-1940s. Interior furnishings provided for display by the West Virginia Division of Culture and History (WVDCH) Museums are also subject to potential flood water damage. Some original wood floor joists have sustained termite damage over the years, and were reinforced in 1992 to provide structural stability to these materials that are subject to flood damage. Non-historic materials subject to flood damage in the basement include non-original plaster on walls, heating and cooling equipment, electrical wiring and ductwork.

Potential measures to reduce flood damages were considered and include the following options: No Floodproofing, Floodwall, Levee, Raise in Place, Raise in Place with 2 ft fill, Raise in Place with 7 ft fill, Relocation, Veneer Wall. General design concepts were used to generate preliminary cost, engineering and environmental feasibility considerations to augment the discussion of floodproofing options. The ability of potential floodproofing measures to maintain the National Register values of the Jenkins House and meet preservation objectives was paramount in their evaluation and screening. Flood risk management options may offer anticipatory protection from future flooding, but a flood threat should also be evaluated within the context of other threats posed to a historic property. It is important to consider the harm posed by a flood protective measure itself to the property's physical and historical integrity. The evaluation matrix (presented as Table 2 on the following page) summarizes the screening of floodproofing options against preservation objectives. Based on this screening and accompanying discussion of options, the floodproofing options that best meet preservation objectives are to be incorporated into preservation alternatives.

Table 2. Screening Matrix. Initial Screening of Floodproofing Options against Preservation Objectives. *Objectives adopted from the Preservation Plan and based upon evaluation of effects criteria under Section 106 of the National Historic Preservation Act.*

✓ = Meets objective

— = Does not meet objective

~ = Partially meets objective

N/A = Objectives not directly related to floodproofing options, but to other preservation actions.

		Floodproofing Options						
	Preservation Objectives	Floodwall	Levee	Raise in Place	Raise w/ 2ft fill	Raise w/ 10 ft fill	Relocate	No Flood-Proofing
1	Expends funds solely on the preservation of existing original fabric by arresting ongoing or imminent degradation	—	—	—	—	—	—	✓
2	Reverses a non-historic intervention that has compromised the physical status and longevity of the house, and in turn supports historic integrity.	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
3	Provides an accurate record of the building's design, materials and features in anticipation of future loss and the need for replacement or replication.	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
4	Does not jeopardize National Register values or interpretation of archaeological features.	~	~	—	—	—	—	✓
5	Does not indirectly compromise other historic fabric or that of associated historic properties, or foreclose on long-range preservation or possible restoration goals.	—	—	—	—	—	—	✓
6	Does not introduce non-contributing elements or characteristics to the site and landscape that have the potential to further erode the building's integrity of setting, association, and feeling.	—	—	—	—	—	—	✓
7	Stabilizes significant character defining features and fabric that may be repaired or restored, should additional historical documentation or funding become available.	—	—	—	—	—	—	✓
8	Maximizes available funding according to federal preservation standards, while avoiding or minimizing invasive treatments.	—	—	—	—	—	—	✓

No Floodproofing

Though the "No Floodproofing" option was the last to be developed and considered, it is presented first as it fully meets preservation objectives and was not presented as an option available for public comment during initial project scoping.

Description

The option not to floodproof the Jenkins House, when incorporated with the proposed preservation action, would entail preserving the structure in place without introducing any floodproofing measure. Potential flood risk management methods that were considered, but are not included as a part of this option included elevating utilities and Heating, Ventilating and Air Conditioning (HVAC) ductwork currently located in the basement above the 100-year flood elevation. Relocation of electric utilities out of the basement is not recommended as it would eliminate basement lighting that allows routine maintenance, security and visitor access and interpretation in the basement floor. Heating and cooling of the first floor is achieved through the HVAC equipment located in the basement. Removing the HVAC from the basement and installing a new high force velocity system from the attic to the first floor was considered. However, this technology would require directing 8-10 inch feed and return trunk lines from the attic through the second floor and into the first floor. These features pose potential harm and unwanted non-historic alterations to the interior, and therefore are not included as a proposed flood risk reduction measure. Retrofitting damageable materials such as wood and plaster with synthetic moisture resilient materials was considered to be inappropriate due to potential loss and alteration of historic wood floors, molding etc. Detailed drawings and photographs of existing features has been performed in a fashion similar to the Historic American Building Survey (HABS) to inventory and provide accurate documentation for potential future replacement or repair of features.

Without implementation of flood risk reduction measures, the occurrence of a 100-year or other significant flood event could cover the first floor of the structure. Preservation measures to minimize flood harm, such as post flood cleaning and drying of the structure, are considered appropriate. The Preservation Plan (Appendix A) contains additional recommendations available for reference and use in post flood responses to potential flooding. The Corps anticipates responses to flooding by the Corps, DNR, WVDCH, with the assistance of volunteers and members of the Greenbottom Society. During unexpected natural disasters (such as a 100-year flood), the Corps re-allocates funds to address issues in a prioritized manor. The Corps has initiated consultation with involved parties to formalize plans for post flood actions.

Screening Considerations

Unlike other floodproofing options, the "No Floodproofing" option does not offer anticipatory measures to reduce potential flood damages to the 100-year flood elevation but it does accomplish established preservation goals. It allows available funds to be directed towards immediate preservation needs and represents the least invasive option that avoids potential adverse effects to the historic structure. This option allows the Jenkins House to remain within its existing context and maintain historic relationships to former outbuildings without further altering the landscape or intruding upon the setting with non-historic elements. Stabilizing preservation treatment to be applied with this option supports authentic interpretation of the site.

Impacts to archaeological features and associated costs for additional investigations would be avoided. Preservation funds would be available for maximum use to address immediate preservation needs in keeping with preservation standards.

In the event of a flood, mud and silt deposits are likely to be left in the structure as flood waters recede. Following recession of floodwaters, cleaning of mud and silt deposits and drying are actions that can be taken to minimize water damage to materials. Materials such as wall plaster, window casings and wood floors often swell and shrink when inundated which may result in warping and may require re-finishing or replacement. Accumulation of drift and debris left by floodwaters also requires exterior clean-up.

Significant past flood events serve as a general predictor for the potential damages that may be incurred by future flooding. The Jenkins House has not sustained unmanageable or severe structural damages from past flood events. It is anticipated that the house would survive potential future flooding in the same manner. Original historic fabric that has been lost to past flood events includes a number of fireplace surrounds, door casings and moldings. Remaining original fabric susceptible to potential future flood damage includes aged hardwood floors and select moldings and trim. Modern appurtenances in the basement including electrical wiring, HVAC equipment and ductwork would likely need replaced following a 100-year event. The development of post flood clean-up recommendations offers readily accessible guidance for potential future preservation responses to minimize harm from flooding. This option allows responses to flooding without posing the potentially adverse effects to the historic structure and setting presented by other floodproofing options. Because this option fully meets identified preservation objectives, it was carried forward to be incorporated into preservation alternatives for detailed evaluation.

Floodwall

Description

Construction of a floodwall to protect the Jenkins House from a 100-year flood event would require installation of a 12-14 foot high reinforced concrete T-Wall with operable gates to close off water during an event. The edge of the floodwall would be approximately 70-260 linear feet from the perimeter of the Jenkins House. A storm drainage system including catch basins, pipe, portable pumps, and headwalls would be required to maintain positive draining on the interior of the wall. These features, along with the gate closure, would require personnel to be on-site for operation during a flood event and require maintenance. (See Appendix B, Figure B.1).

Screening Consideration

Construction for the proposed floodwall would encompass an area of approximately 3 acres surrounding the Jenkins House. Riparian areas adjacent to Turkey Creek would remain intact and temporary construction impacts would extend approximately 120 feet north just to the perimeter of the existing wetland. However, the surrounding landscape would be denuded from removal of trees for construction of the floodwall.

Construction of a floodwall to surround the Jenkins House would present a stark engineering feature that visually intrudes upon the historic setting with a non-historic element. This added

element would alter original and remaining landscape views and the setting in such a way as to jeopardize the National Register values of the structure. Due to the potential adverse effects of a floodwall to the historic landscape, it would be an unacceptable flood protection measure. The location of archaeological features within the floodwall alignment are not entirely known. However, potential adverse impacts to archaeological features would likely be extensive given the level of ground disturbance for floodwall construction. This is the most costly floodproofing option considering estimated project cost ($3.1 Million for construction and additional archaeological investigations) and time required for detailed engineering and implementation. Though a floodwall would protect the Jenkins House to the 100-year flood elevation, it would involve the extraneous use of preservation funds directed towards an action that does not meet preservation specific goals. The issue of applying a flood protection measure is by definition, "protection." But it is not preservation, because preservation actions or treatments are applied directly to the historic fabric or setting of a historic property. Preservation actions are intended to have mostly immediate (measurable) results. A flood protection device is a speculative intervention in that we cannot predict whether the measure would truly protect the building - and when or if it would be needed. A flood protection device has no immediate measurable benefit for the historic property and its potential success cannot be known. But it does have immediate adverse effects on the property's significant National Register qualities of setting, association, feeling, etc. For these reasons the floodwall option was dismissed from further consideration.

Levee

Description

This option entails placing an earthen levee around the grounds of the Jenkins House with a gate closure at the entrance drive. Approximately 1,340 linear feet of levee would be needed to surround the house at an average height of 14 feet, in a configuration similar to that of the floodwall. A levee does not provide passive flood protection; to function during a flood event personnel are required to be onsite for operation of gate closures (considered preferable to ungainly and more intrusive road access over the levee), sluice gates on catch basins, and to ensure proper placement and function of portable pumps. (See Appendix B, Exhibit CGA04).

Screening Considerations

With the incorporation of construction work limits, levee construction would encompass an area of approximately 6.75 acres surrounding the Jenkins House. The base of the levee would extend to the boundary of Turkey Creek to the west and north to the wetland boundary. Fill material would come from an off-site source, either commercially or from an identified borrow area. Construction activities would require that all trees and landscaping immediately surrounding the structure be removed. It would involve clearing the riparian area adjacent to Turkey Creek and temporary impacts extending approximately 75-100 feet into the existing wetland boundary. Levee maintenance and exterior drainage and seepage issues would require further investigation to determine the appropriate boundary delineations for adjacent waterways and wetlands. Permanent impacts to the adjacent wetland and Turkey Creek could result from the need to maintain a dry operable area around the exterior of the levee. The levee option would be the most environmentally damaging of the flood risk reduction options given the extent of intrusion into adjacent stream and wetland.

A levee would protect the structure and immediate surrounding property from water encroachment to the 100-year flood elevation. Use of natural materials makes the appearance of a levee potentially less stark than the floodwall. However, the height and close proximity to the house would pose the same severe intrusion and alterations to the historic setting and landscape as the floodwall. The effects of a levee would serve as a barrier isolating the house from the historic setting and inhibiting interpretation of the site. Potential adverse impacts to archaeological resources in the vicinity of the house would necessitate additional investigation. Estimated overall cost for levee flood protection is approximately $1.7 million (for construction and additional archaeological investigations). Like the floodwall, this option would not maximize the use of available funds or meet outlined preservation objectives. The only levee alignment that would not disrupt the historic setting would be one that is not visible from the house. The cost for an extensive structure beyond that described here is also considered to make incompatible use of preservation funds. The levee option would not achieve the preservation objectives due to adverse effects to the historic setting, archaeology and investment of funds for a preventative measure that could otherwise be used on preservation treatments directly applied to the structure. For these reasons it was dismissed from further consideration.

Raise in Place

Description

This option involves raising the first floor and its supporting joists above the 100-year flood elevation (560 feet amsl) by making the foundation walls 3 feet taller. The foundation walls would be removed, concrete footers poured, and the stones of the walls reconstructed. The first floor of the house is now at 558.8 feet amsl and is approximately 5 feet above the ground surface (553 feet amsl). The present ground surface is 1 foot higher than it was when the house was built, due to accumulations of sediments over the last 175 years. When the house was built, the first floor was approximately 6.22 feet above the ground surface; it is now at 5.22 feet. After raising-in place, the first floor would be 8.22 feet above the present ground surface, an increase of 2 feet over the original relationship. The top of the stone foundation and the base of the brick structure of the house is now about 3.5 feet above the ground surface and would sit about 6.5 feet above the ground surface if the structure is raised 3 feet. The interior height of the basement would change from 7 feet to 10 feet. If the interior walls of the basement continue to have a plaster cover then the new concrete footer interface with original stone foundation would not be visible from the basement interior. The two fireplaces in the basement could be dismantled and rebuilt if necessary. Raising the structure would elevate the first floor above the 100-year level and allow lower levels (the basement) to be inundated. It is a passive floodproofing measure that requires no additional operation or maintenance, but would still require some post-flood actions.

Screening Consideration

Potential environmental effects of the Raise in Place option would be limited as they would be confined to the immediate lawn area (25-50 feet from the house) during construction. In some cases, historic structures can be successfully raised out of the 100-year floodplain.

The following are fundamental factors used to determine the potential effects of raising:

- Proposed height
- Effects on original design qualities

- Effects on functional interrelationship with former outbuildings
- Resulting relationship to the historic landscape
- Effect of overall visual change in context with other alterations or intrusions to the setting.
- Effects on prehistoric and historic archaeology adjacent to the house

The proposed 3 foot raise of the stone foundation above the present grade (though only 2 feet above the historic grade) would create an unbalanced and awkward visual representation by exaggerating the vertical scale of the foundation that would place the main floor 8 feet above the ground surface. It would present a non-historic first-story appearance to the basement compared to the original design of the first and second stories. The raise would also require the extension of stair entrances, adding another non-historic relationship to the structure. Raising the structure may also damage historic masonry and mortar similar to what would be expected with moving the structure and would impose a non-historic 3 foot high section of stone in the foundation. The interior height of the basement would be increased from 7 feet to 10 feet, distorting the original spatial relationship. Overall, the Raise in Place option would adversely affect the historic relationship of the building to the landscape by changing immediate stairway access and distorting relationships between the house and former outbuilding remnant foundations. The final, and perhaps most important, consideration is that raising the house would further alter the historic landscape that has already been compromised by the nearby railroad, highway lines, and modern structures.

Raising the structure in place would have adverse effects on historic and prehistoric archaeological deposits proximate to the basement during excavation to remove stones and place footers for the foundation walls. Additional archaeological investigations that would be required to undergo this effort would involve excavation of 2 meter wide trenches along all exterior walls of the house and 1 meter wide trenches along all interior walls of the house. While these investigations would yield information on construction of the basement, such information is not a part of the intent for the proposed preservation actions. Further, archaeological investigations would explore only portions of the surrounding prehistoric site not likely sufficient to allow full understanding of this important resource. Approximate cost for additional archaeological work would be $300,000.

Estimated cost for raising the structure is $200,000 (which does not account for design cost). With the added cost of archaeological work, the overall cost of this option is approximately $500,000. The Raise in Place option does not meet preservation objectives due to the further endangerment and harm it poses to original fabric and sensitive archaeological deposits; the introduction of non-contributing characteristics to the basement interior and foundation scale; and the potential to disrupt the building's original context within the landscape. Raise in Place does not maximize the use of available preservation funds, as resources would be diverted towards addressing potential adverse effects archaeological resources that could otherwise be applied towards preserving of existing original fabric and immediate preservation needs. For these reasons, this option was dismissed from further consideration.

Raise in Place with 2ft fill

Description

This would involve raising the house as described in the Raise in Place option, and backfilling around the house to mask the visual effects of the raise upon the exterior and achieve an approximate contour of the existing site. Two feet of random fill would be placed around the house to bring the ground elevation to 556.0. (See Appendix B Exhibit CGA02).

Screening Considerations

The effects of this action would be similar to those for Raise in Place without backfill except for the following:

- The relationship of the first floor to the ground surface would be restored to 6.22 feet as it was when the house was built.
- The basement windows would need to be moved up higher in the basement walls.
- The exterior basement entrances would need to be reconfigured to the new ground surface.
- Placement of 2 feet of fill would encapsulate the prehistoric and historic archaeology in the vicinity of the house, protecting these materials and features from damage. This cover would also inhibit possible future exposure of extant foundations of the outlying structures such as the privy, office, kitchen, presumed slave quarters, and sidewalk.

Placement of approximately 700 cubic yards of fill would increase project cost by approximately $50,000, with the attempt to mask the visual affects of the raise upon the exterior. The reconfiguration of basement windows and entries to accommodate the fill would alter the relationships of those entries to the ground surface. Fill would also bury former outbuilding foundations, thereby voiding historical interpretation of these features and the role they played on the plantation. For these reasons, and for those stated above for the Raise in Place option, this option has been dismissed from further consideration.

Raise in Place with 7ft fill

Description

This option was considered as a result of public interest in the possibility of raising the entire structure (including the basement) and site above the 100-year flood elevation. This option would entail raising the house 7 feet on block and placing 7 feet of random fill around the house to bring the ground elevation above the 100-year flood elevation (561 feet amsl). There would be a 10 foot wide bench around the house, with slopes from top of the new fill to the existing ground varying from 15% to 17%. Approximately 6,000 cubic yards of fill would be needed. (See Appendix B Exhibit CGA01). This option increases project cost by approximately $350, 000 for placement of fill, resulting in an overall project cost for construction and additional archaeological investigations of approximately $850,000.

Screening Considerations

This option would elevate both the structure and the basement above the 100-year floodplain. Placement of fill for this option would extend to the boundary of the adjacent stream and wetland. This option would severely alter the setting by complete removal of surrounding trees and landscaping, and re-positioning the house atop a newly engineered fill. The house would be

raised dramatically out of its original context, creating a non-historic relationship to the surrounding landscape. Former outbuilding foundations would be deeply buried beneath the fill, and the newly created (non-historic) rise would interrupt the historic setting and produce an inaccurate portrayal of the structure and former outbuildings to the historic agricultural landscape. Critical links to archaeological features in the ground would be lost and buried out of reach for meaningful interpretation of the site and its uses. This option was dismissed from further consideration for these reasons and for those previously stated for the Raise in Place and Raise in Place with 2 ft fill options.

Relocation

Description

Relocating the structure would involve placing support beams under the floor joist and disassembly of the foundation to allow overland transportation of the house to be re-established at another location above the 100-year flood elevation.

Screening Considerations

Some historic properties can be relocated with minimal impact to National Register values, specifically when their significance is not heavily dependent upon original location. The Jenkins House's existing location along the Ohio River bottom in an agricultural and woodland setting is key to the building's significance and ability to communicate its role as a former plantation, as presented in the National Register nomination. Though relocation could be achieved to re-create a more remote and primitive ambiance with landscape features to screen modern intrusions that detract from the historic setting (railroad, highway, power lines and nearby housing developments), relocation is not recommended. Relocation of the structure would likely jeopardize the building's National Register listing. It would be difficult to justify that the building's significance is not directly tied to its original setting and that a new location could accurately recreate the features of the original setting. Additionally the building would be completely removed from its original connection to former outbuilding foundations; the relationship to archaeological features that contribute to its significance could not be recreated at a new location. Potential physical harm would also be posed through the act of moving the brick structure as they are more difficult to move successfully than frame construction. For these reasons, this alternative was dismissed from further consideration.

Veneer Wall

Description

A veneer wall is a waterproof membrane that is bonded to the exterior of a structure, and then protected by a layer of brick or stone. Veneer walls are designed to seal and block water penetration during high water events. However, they do not provide any structural stability to withstand the forces of floodwaters against the structure.

Screening Consideration

This floodproofing option is not structurally feasible to implement at the Jenkins House because the required height of a veneer wall would significantly exceed the maximum recommended height (5 feet), according to engineering standards. Additionally, the structural stability of the

house is not considered adequate to implement this method. Therefore, this option was dismissed from further consideration.

3.3 Alternatives Evaluated in Detail

Common to all of the alternatives are those preservation treatments presented in Section 3.1. In addition to these preservation actions, appropriate floodproofing options would be integrated as components to alternatives for further evaluation in detail. Flood risk reduction options of a floodwall, levee, veneer wall, relocation of the house, or to raise the building and fill the surrounding landscape would adversely affect elements contributing to the National Register values of the structure. These potential floodproofing options did not fulfill preservation objectives, nor the overarching standard that preservation treatments should not adversely affect the historical and architectural qualities of the Jenkins House, associated archaeological features and landscape. Unlike other options, the "No Floodproofing" option could be incorporated into a preservation alternative that would not cause adverse effects to the National Register status of the property.

Proposed Action - Preserve in Place

Description

The proposed action (Preserve in Place Alternative) would involve applying preservation treatments to the Jenkins House as recommended in the Preservation Plan and described in Section 3.1, and reinstated below. The least invasive measure to address flooding is the option not to floodproof the structure but rather allow for clean up following an event. This "no floodproofing" option is incorporated with the proposed action.

- Gabled Dormers – removal of non-original dormers is proposed to reduce water infiltration by removal of this common entry point that is not historically accurate and allows for more authentic interpretation of the structure.

- Roofing – replacement of the aging asphalt roof is proposed as one of the most valuable preservation actions which could provide continued protection to the structure from weathering and stem potential future water infiltration. Use of materials that provides long-life durability with similar visual qualities (color, texture and dimension) to original wood shingles is proposed.

- Masonry (brick, stone and mortar) – total re-pointing of brick, sandstone foundation and partial rebuilding of chimneys with historically appropriate lime-based mortar is proposed to stabilize these elements and stem ongoing damage from past interventions with inappropriate materials. Paint removal is also proposed to facilitate re-pointing of brick, prevent moisture entrapment and incidentally return the building's exterior to the original un-painted brick appearance.

- Garage/Addition – removal of the non-original garage/addition is proposed to facilitate access to the east side of the building for complete re-pointing of brick and foundation stones, and incidentally removes an element not associated with the historic period of significance.

- Windows – a detailed inventory of window conditions is proposed to be followed with replacement and/or repair of deteriorating elements with historically appropriate materials and design.

- Ventilation (Moisture Infiltration) – the addition of discrete ventilation openings are proposed to address the structure's ability to maintain proper moisture balance between the interior and exterior in response to seasonal and diurnal changes in temperature and moisture.

- Utility Upgrades (Safety and Hazard Considerations) – attention to relevant electrical system upgrades identified by a certified electrical engineer is proposed to ensure proper function of electrical systems. (This includes minor actions to upgrade or replace circuit breakers, outlets, etc.) Removal of non-historic exterior electrical fixtures is proposed to stop water from migrating into masonry.

Screening Considerations
Collectively, proposed preservation treatments included in the proposed Preserve in Place alternative meet stated preservation objectives. These actions would involve standard home improvement type actions to be implemented to the structure. Preservation funds are utilized to sustain existing original fabric, and not jeopardize associated features through the addition of non-contributing elements or disturbance of buried archaeological remnants. National Register values of the structure and its elements would be retained. Rather, non-historic features would be removed and replaced with historically appropriate materials. Documentation of features has already been achieved during the preservation planning effort in anticipation of potential future restoration or necessary repair or rehabilitation to features. Because these actions meet identified preservation objectives, this alternative is to be carried forward for detailed evaluation.

No Action
Description
Under the No Action alternative the preservation actions as described in the Proposed Action (Preserve in Place alternative) would not be implemented. Rather than incorporating preventative preservation measures to arrest or minimize ongoing deterioration to original fabric, the No Action alternative would involve continued routine maintenance of decaying or deteriorating features.

Screening Considerations
This alternative serves as a basis for comparison of other alternatives and must be considered and carried forward for detailed evaluation as prescribed under NEPA. It does not incur any cost for immediate implementation, nor pose any direct adverse effects to cultural resources. Although it touches upon outlined preservation objectives, the No Action alternative is a passive preservation approach that does not seek to reduce or prevent harm to the original historic fabric. As a result, the No Action alternative may result in the future inadvertent loss or endangerment of original features and fabric due to lack of funds for applying necessary preservation treatments.

4.0 Existing Conditions and Environmental Consequences

This section is intended to provide a description of the environment of the project and surrounding areas potentially impacted (either beneficially or adversely) by the Preserve in Place and No Action alternatives. A limited number of resources may be affected due to the nature of the work associated with the preservation actions. Preservation efforts would involve typical home improvement activities. The "footprint" of these activities may extend beyond the structure to the immediately surrounding lawn and maintained areas around the Jenkins House. The area would be used for staging of supplies and materials for garage demolition, masonry, widow and roof work. Therefore, only resources determined to pertain to the project area and scope are summarized in this assessment. Other resources were considered such as fish and wildlife, water quality, Threatened and Endangered species, etc. These resources were excluded from analysis because they were not a part of the project environment and they would not be impacted by the project. Chief among resources to be potentially impacted by proposed preservation actions is the Jenkins House itself (considered a Cultural Resource).

4.1 Cultural Resources

The Jenkins House would benefit from the proposed Preserve in Place alternative. Proposed preservation actions are expected to both reduce potential future harm to original fabric and features of the structure and maintain the structure within its existing setting. The Preservation Plan captures all of the anticipated improvements and benefits to key features of the house including the roof, windows, masonry, and utilities. The original fabric and features of the Jenkins House would not be impacted by the proposed preservation actions. Instead, non-original fabric and features would be removed and would be replaced with materials appropriate to the period, in appearance, style and techniques of the original. The result would be beneficial to the preservation of the structure and to its aesthetics, returning the Jenkins House more closely to its appearance during the 1835-1860 period of significance.

The house and its dependency structures were built on an archaeological site, recorded as 46CB41. The Huntington District has previously conducted test excavations to locate the remains of Jenkins House dependency structures and to establish the nature and extent of 46CB41. 46CB41 is known to contain artifacts and features including materials that date to the early and late Woodland periods and the late prehistoric period as well as historic period artifacts and features related to the Jenkins house. The Huntington District has determined that 46CB41 is eligible for listing in the National Register of Historic Places. Important archaeological features of former outbuildings would be untouched by both the Preserve in Place and No Action alternatives. These and other historic and prehistoric archaeological resources would remain in place for future interpretation and study as needed.

The Preserve in Place alternative is expected to meet historic preservation goals by protecting, repairing, and maintaining original historic fabric and features to their fullest extent. An added benefit is that the public would be ensured of an authentic and historically accurate portrayal of the property. This would be achieved by removal of materials and elements such as dormers, office addition, and paint that are detrimental to the health of the building, and do not date to the period of significance.

4.2 Social Effects

The Jenkins House serves as a regional historical attraction that is open to the public daily for interpretation and offers annual events that draw visitors as well. Currently the WVDCH maintains operating hours at the Jenkins House from 10am-4pm on Tuesday – Saturday. Seasonal programming events noted by the WVDCH typically include: Heritage Day Events (September), Fall Civil War encampment (dependent upon availability of re-enactors), Holiday Event (December), Civil War encampment (May). According to information provided by the WVDCH site manager, peak visitation coincides with the months of scheduled events - May, September, October, and December (Boggess 2007). The site manager records also indicated that from 2002-2007, average monthly visitation ranging from 85-135 visitors during peak months. Estimated attendance to scheduled events can very depending on the weather and other events scheduled. The site is least frequented by visitors in the period from January-April. The lowest recorded visitation occurred in the winter/spring of 2002, which no visitors were recorded at the site. The greatest number of guests (566 visitors) was recorded in September 2005.

Under the No Action alternative, there would be no impacts to the operating schedule or availability of the house to the public. Implementation of the Preserve in Place alternative would involve temporary closure of the museum during construction, anticipated for a period of approximately 18 months. This closure is being coordinated closely with the WVDCH to be posted for public notice. In the interest of public safety and contractor and house security, public access and WVDCH scheduled programming events would be restricted for the duration of construction. To facilitate public awareness and alternate interpretive experience, the WVDCH will sponsor a public ceremony to commemorate initiation of Preservation and virtual construction updates will be available on-line. Public visitation is anticipated to resume upon completion of the proposed action.

4.3 Floodplain Management

Executive Order 11988 provides guidance to federal agencies to avoid, where practicable, adverse impacts associated with occupancy and modification of floodplains. Federal agencies should further avoid supporting development within the floodplain. In the event structures and facilities are constructed in the floodplain, they should be compliant with National Flood Insurance Program (NFIP). New construction or rehabilitation should be done with accepted floodproofing or flood protection measures (with preference given to elevating structures rather than filling in the floodplain). Conspicuous delineation of past and probable flood heights is recommended for properties utilized by the general public that have suffered flood damage or are in an identified flood hazard area to enhance public awareness.

FEMAs Floodplain management criteria for flood-prone areas (44CFR Part 60.3 (c)(3) requires that all substantial improvements of non-residential structures within flood zones on the communities Flood Insurance Rate Map either have the lowest floor (including basement) elevated to or above the base flood level or, be designed so that below the base flood level the structure is water-tight with walls substantially impermeable to the passage of water. However, historic structures are exempt from the floodproofing requirement, providing that the proposed improvements do not affect the structures' historic designation (44CFR Sec. 59.1).

The exemption to the substantial improvements requirements is applicable to the Jenkins House as it meets the following guidelines: 1) the building is a historic structure, 2) proposed preservation activities would maintain the historic status of the structure, 3) All possible flood risk reduction measures are being considered (e.g. locating mechanical and electrical equipment above base flood elevation) (FEMA 2005b).

4.4 Wetlands

Executive Order 11990 directs federal agencies to avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands and to avoid support of new construction in wetlands where there is a practicable alternative.

A series of wetlands are maintained throughout the 836 acre tract purposed for mitigation of ecological impacts to the R.C. Byrd Replacement. Wetlands were developed in areas by increasing soil moisture and seasonal inundation to Bottomland Hardwoods through dike construction. Existing wetlands throughout the site are comprised of open water, shrub and wooded wetlands. The nearest wetland lies approximately 115 feet from the Jenkins House with water levels maintained by the WVDNR. Neither the proposed action nor the "No Action" alternatives would intrude upon this area, which should therefore remain unaffected.

4.5 Hazardous, Toxic and Radioactive Waste (HTRW)

Lead-based paint (LBP) is a toxic material commonly found in historic structures due to the use of lead in paint manufacturing until 1978. Lead content was confirmed on the painted brick exterior of the Jenkins House in samples collected from the north and south elevations during the masonry assessment (Speweik 2007). In accordance with 40 CFR 261.24, the level of lead-based paint that would be involved in disposal is classified as hazardous. Human health concerns from exposure to lead are generally reserved for residential structures and are highest for children that may ingest dust particles or chew on lead coated surfaces (Park 1995). Sites such as playgrounds, daycare facilities or housing areas are regulated by HUD and the EPA for proper remediation in areas of frequent and prolonged contact.

The Proposed Action would involve removal of paint from exterior masonry surfaces. Typical LBP removal methods, such as sandblasting, are not appropriate given the need to preserve original brick exterior of the historic house. The National Park Service provides some recommendations on appropriate methods for removal of lead paint in historic housing, in Preservation Brief 37. Proposed paint removal methods may involve application of solvents, rinsing with water, and capturing rinse water for disposal, similar to the technique used by U.S. Heritage Group during the masonry assessment. Following removal, the paint and the wastes would have to be disposed of as a hazardous waste. Removal and disposal in accordance with all applicable regulations would involve proper containerization, marking, manifesting on a hazardous waste manifest, and disposal at a hazardous waste facility. This would result in the permanent removal and containment of LBP from the structure.

Human exposure to lead would be during paint removal through vapor emissions (if removal method involves use of solvents) and airborne particles primarily to workers involved in

masonry paint removal. Special containment, disposal and worker safety standards as described in the Occupational Safety and Health (OSHA) regulations 29 CFR1926.62 would be incorporated into design and implementation documents. Such specification are outlined in the Unified Facilities Guide Specifications (UFGS-02 82 33.13 20) which include provisions for ventilators and/or special protective clothing for workers, field quality control testing of air and surrounding soil before, during and after paint removal as well as documentation of cleanup and disposal. Lead based paint removal and disposal is to be performed in accordance with these standards.

The painted exterior masonry surfaces have been deteriorating over time through flaking, chalking and/or weathering. This deterioration has potential to contaminate soils directly surrounding the structure with lead. Soil testing is to be performed to determine the concentration of lead in surrounding soils to determine if any further action is needed. Based upon results of sampling, appropriate measures would be incorporated into the proposed action.

The proposed action may include removal of a 1930's kitchen/office addition, with the potential to encounter asbestos-containing materials. An asbestos inspection was conducted by the Corps' Environmental and Remediation Section on samples taken from building materials throughout the structure on February 15, 2008. No asbestos-containing materials were identified from the samples taken and therefore no additional consideration is needed.

Under the No Action alternative, exterior masonry surfaces would remain painted with the covering of underlying LBP surfaces by the outer non-LBP layers. Gabled dormers and office addition would remain intact. Continued weathering and deterioration of LBP from these exterior painted surfaces would continue over time.

4.6 Air Quality

The Clean Air Act (40 CFR Part 93), as amended in 1990, requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The West Virginia Department of Environmental Protection (DEP), Division of Air Quality (DAQ) website provides a listing of West Virginia's attainment status with the NAAQS. Ambient standards are set for ozone (O_3), particulate matter, sulfur dioxide (SO_2), carbon monoxide (CO), nitrogen oxides (NO_x), and lead (Pb). As of June 2004 the U.S. Environmental Protection Agency (EPA) has formally designated Cabell County as a non-attainment area for the 8-hour ozone NAAQS with federally approved air quality maintenance plans in place under 40CFR Part 93. The area is considered to be a maintenance area for 8-hour ozone, which requires that levels for general conformity (100 tons/year) are not exceeded. Cabell County is also designated as a non-attainment area for Particulate Matter ($PM_{2.5}$) NAAQS. The county is in attainment or is not classifiable for all other NAAQS. Direct emissions and fugitive dust contribute to PM2.5 levels, having SO_2 and NOx as identified precursors.

Major sources of lead emissions have historically been from vehicle fuels containing lead; metals processing is a major source of lead emissions today. NAAQ standards are set for a quarterly average of 1.5 micrograms/cubic meter. According to the EPA website, both the National and

State Annual Maximum Quarterly Averaged are reported to be well below the National Standard range between 0.0 and 0.25 from 1990-2006. Limited lead paint removal at the Jenkins House is unlikely to contribute a significant amount of lead emissions either to the State or the National Average. The Preserve in Place alternative may involve the use of a single piece of construction equipment for demolition of the modern addition, for less than a month. Direct emissions would be lower than the de minimis levels of 100 tons/year. The Preserve in Place alternative would not exceed de minimis levels of direct or indirect emissions of a criteria pollutant or its precursors. The No Action alternative would have no impacts to air quality.

4.7 Environmental Justice

Under Executive Order (EO) 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations," federal agencies are directed to identify, address, and avoid disproportionately high and adverse human health or environmental effects on minority and low income populations. The nature of preservation actions for the Jenkins House is related to home improvement activities to stabilize original historic fabric of the structure, no actions would be directed towards other human habitations aside from the Jenkins House. There would be no effect to minority or low income populations.

5.0 Cumulative Effects

Cumulative effects are defined as, "the impact on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7).

Scoping Cumulative Effects Issues

Based on a thorough review of the project and scoping efforts, cultural resources are the only resource associated with this federal action with the potential for cumulative effects. This cumulative effects analysis, therefore, focuses on the Jenkins House and adjacent prehistoric sites as the significant cultural resource to be affected by past, present and reasonably foreseeable actions. As a listed property on the National Register of Historic Places, the Jenkins House is recognized as a one of the Nation's noteworthy historic sites. The borders of the original plantation boundary are considered the appropriate geographic boundary for cumulative effects considerations, given that the activities on the plantation contribute to its significance. Changes to the historic plantation grounds must be considered within the context of its present surroundings to determine what past actions have altered landscape features and other elements that contributed to the character of a former plantation. The temporal boundary for this analysis is for a typical planning horizon of 25 to 30 years.

Built in the 1830s, the house passed from family ownership a hundred years later and since has been occupied by others who have modified some of the historic features of the building. Other past actions have also indirectly affected the Jenkins House through altering the historic setting. Modern developments to the south of the Jenkins House include the addition of the railroad, widening and modernization of State Route 2, power lines, and residential construction. To the north, the structure is bordered by the Greenbottom Wildlife Management Area along the Ohio River bottom; this area has been altered through the modern management of wetlands and

wildlife food plots. Original outbuildings and other plantation features are no longer visible, only buried archaeological foundations remain. The house and property was purchased by the Corps of Engineers in 1989 as mitigation for impacts associated with the new lock construction at R.C. Byrd Lock and Dam. Since then, the house has suffered some weather damage associated with reduced maintenance.

These past effects were considered closely during current planning efforts. During development of floodproofing options and preservation alternatives, prime consideration was given to actions that would not further adversely affect the historic property. Floodproofing options were an important direct effects concern for their potential to impact to the sustainability of the site's historic character in light of many of the changes to the historic context of the site. Potential adverse effects to the historic structure and setting were avoided through elimination of invasive floodproofing options.

Unlike other locally significant historic resources the original landscapes of which have been fragmented and parceled off into lots, the Jenkins House remains within a relatively undeveloped portion of its original landscape. Because this area is owned by the federal government and managed by a state agency for fish and wildlife management activities as a mitigation feature of the R.C. Byrd Lock and Dam Replacement project, it provides a measure of protection to the Jenkins House from future fragmentation of the surrounding site.

For this analysis, meeting the Secretary's eligibility standards for National Register listing is considered the measure for sustainability. Several reasonably foreseeable future actions have the potential to affect the house and its historic eligibility. Route 2, within view of the house to the south, may be expanded to four lanes within this temporal range. No date has been established for this action but planning for this upgrade has been underway for many years. Since this action would be on the backside of the house in an area already affected, it would not constitute a significant impact to the resource. The concept for a visitors' center has been developed by WVDCH for a structure that is visually compatible with the period of significance to be located to the east of the Jenkins House, the specific design and location of which would be planned so as not to affect the National Register eligibility of the Jenkins House. To the north and east, management of the wildlife area currently promotes a static condition as current management does not affect the house's eligibility now and no changes are envisioned.

The proposed federal action is anticipated to provide lasting preservation benefits to the Jenkins House for approximately 25-30 years and to reduce future maintenance/repair associated with water infiltration via the roof, dormers and windows and facilitate proper moisture transport through masonry. No reasonably foreseeable future actions have been identified that may cumulatively affect the historic property adversely. Therefore, the proposed action does not warrant additional cumulative effects considerations.

6.0 Plan Selection (Conclusions)

The Preserve in Place alternative was developed with the aid of thorough site investigations, extensive stakeholder and public involvement, and with recommendations made by historic masonry specialists. Development of the Preservation Plan by the Center of Expertise for the Preservation of Historic Buildings and Structures also contributes to the soundness of the recommended preservation approach. Safeguarding the historic integrity of both the structure and its landscape in support of its National Register listing, remained central throughout the evaluation of preservation options and alternatives. The option not to floodproof the structure allows for accomplishment of preservation objectives by avoiding potentially adverse impacts of invasive floodproofing treatments and offers guidance for flood response efforts to minimize harm of potential flooding. Potential HTRW concerns associated with lead based-paint removal and asbestos encounters during removal of the addition would be addressed through proper implementation of environmental specifications for removal, control and disposal methods and worker safety. The public may be temporarily inconvenienced due to closure of the museum during these activities; however, it is in the interest of both public and contractor safety. Following implementation of the Preserve in Place alternative public interpretation of the Jenkins House would be improved through a more historically accurate portrayal of the structure to the period of significance, by removal of non-original dormers and office/kitchen addition. Specific character defining features (masonry and windows) would be stabilized through recommended treatments and reversal of compromising non-historic interventions.

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Appendix A

Preservation Plan

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▪ HISTORIC PRESERVATION PLAN ▪

ACTIONS AND TREATMENTS

General Albert Gallatin Jenkins House
Lesage, West Virginia

Prepared by Lauren McCroskey
Center of Expertise, Preservation of Historic Buildings & Structures
U.S. Army Corps of Engineers, Seattle District

May 2008

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- HISTORIC PRESERVATION PLAN -
ACTIONS AND TREATMENTS

General Albert Gallatin Jenkins House
Greenbottom, West Virginia

1. INTRODUCTION

This document addresses measures necessary to ensure the protection and longevity of the historic fabric, features, and associated landscape and archaeological values of the General Albert Gallatin Jenkins House, a property listed in the National Register of Historic Places. The document is a direct response to enabling legislation through Section 548 of the Water Resources Development Act of 2000 that mandates the U.S. Army Corps of Engineers, Huntington District (Corps) to undertake preservation actions on the property in accordance with Federal standards and definitions outlined in 36 CFR Part 800, and in the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Historic preservation, by Federal definition, is understood to mean specific applications and treatments to retain and maintain existing original historic fabric, to arrest ongoing degradation of historic materials and features, and to anticipate and correct deficiencies that pose immediate harm or endangerment to the property. Preservation is differentiated from restoration and reconstruction, both of which specify actions taken to recreate missing features and elements according to original design intent and exacting standards of historic authenticity. The following summarizes treatment approaches found in the Secretary of the Interior's Standards for the Treatment of Historic Properties; the first being the approach taken herein for the Jenkins House:

> ***Preservation*** *focuses on the maintenance stabilization, and repair of existing historic materials and retention of a property's form as it has evolved over time.*
>
> ***Restoration*** *depicts a property at a particular period of time in its history, while removing evidence of other periods.*
>
> ***Reconstruction*** *re-creates vanished or non-surviving portions of a property for interpretive purposes.*

In 1990, the Jenkins House received a number of maintenance and rehabilitation treatments that arrested some ongoing deterioration and water problems. While effective in stemming deterioration, some of these measures, such as selective replacement of window sash and the use of asphalt shingles did not meet federal historic preservation standards. For the first time, this current effort imposes high preservation standards, guided by all available federal planning documents, technical information, and protocols and precedents for the treatment of historic properties. The recommendations in this plan have two intended consequences: 1) To direct actions and treatments which meet the above definition of preservation in the interest of retaining and protecting the property's significant historic fabric and features; and 2) To guide the future development of individual contract order work for specific treatment undertakings.

These proposed actions fall under the greater historic planning objective of returning the surviving building to the historic period, 1835-1860, the years during which General Albert Gallatin Jenkins inhabited the property before the Civil War and the peak years of the farm's operation as an Antebellum agriculture settlement along the Ohio River.

2. PROPERTY HISTORY

When constructed with slave labor for Captain William Jenkins in 1835, the house and associated structures and 4,000 acres including cultivated Ohio River bottom land and forested uplands represented one of the few examples of an agricultural plantation in the western region of then Virginia. Though architecturally less dramatic than plantation homes built earlier along the eastern lowlands of the Virginias, and those farther west in Kentucky, the Jenkins property embodies the unique circumstances of its builder, and captures the vernacular ideas of those who moved westward with the imprint of fashionable architectural emblems, and the ambitions of western expansion. It is a rare and somewhat late example of Federal style architecture built in this region of the state.

Because William Jenkins resided in an affluent region of Rockbridge County, Virginia before moving west, he and his family had been exposed to sophisticated architectural trends common to the Federal period. As was the pattern of many settlers moving westward, the Jenkins family most likely carried this appreciation of faddish design principles to western Virginia and sought to recreate them in the house they built at Green Bottom. Their new home's chaste brick design expresses the subtleties of the Federal style in neo-classical front and rear entries and interior fireplace surrounds, in a compact winding back staircase with decorative stair ends, and in interior dado and classical pilaster details around windows. Missing are the original windows that no doubt were nine-over-nine sashes featuring slender frames, and narrow glazing bars with ovoid Federal style profiles.

Given the academic rendering of the Federal style throughout the home's surviving building fabric, it is appropriate to model preservation efforts according to these stylistic principles. For example, although the original windows have been replaced, a Federal style window format can be used to guide the pattern, dimensions, depth, thickness, and molding profiles of new windows.

In addition to the historic values embodied in the house itself, the environs – both natural and human made – reflect period ideas about the family's relationship to the land, integrated plantation activities, and labor structure. Within its immediate landscape, the home has tangible associations with former outbuildings, whose foundations have yielded information about the Jenkins' family and its tenure, as well as indications of later habitations. As the birthplace of William's son, Albert Gallatin, the home also claims associations with an individual locally revered for service as a brigadier general in the Confederate Army and a representative of the Confederate Congress of America. He also served as a representative of the U.S. Congress, and is known for his contribution in separating Virginia from the Union. General Albert Gallatin Jenkins commanded several army campaigns between 1862 and 1864, his life cut short by lethal wounds suffered in battle.

Finally, the significance of the property lies in its location over a prehistoric archaeological site eligible for listing in the National Register of Historic Places that records the earlier human experience of living along the river bottoms. Altogether, this locale expresses a pattern of

continued use from prehistory through the mid-nineteenth century, and affords multiple opportunities for stewardship and interpretation of West Virginia's ancient and more recent history, including the African American experience. There is still much to probe in the archaeological and historical record about the role of African American slaves at Jenkins House, and their life ways and contributions, as compared to other related plantations of the period.[1]

The Corps acquired the house and 836 acres in 1988 after expansion of the Robert C. Byrd Lock and Dam project necessitated creation of mitigation wetlands. After developing the wetlands, the Huntington District leased the house and property to the West Virginia Department of Natural Resources (WVDNR) as a wetland mitigation and wildlife area. WVDNR has leased a four acre portion of the tract that includes the Jenkins house and a prehistoric/historic archaeological site to the West Virginia Division of Culture and History (WVDCH) which operates the Jenkins house as a house museum, open to the public.

3. EVALUATION PROCESS AND METHODOLOGY

The methodology for identifying treatment options entailed several site visits to the property in March and April 2007 to assess the building's current status and historic character, and to note integrity levels of various building aspects, materials, and features. Field evaluation was supplemented by a review of existing historic structures reports, restoration proposals, and redevelopment plans, as well as historic photographs and related documentation. Photographs of building elevations and details were captured to aid off-site assessment, and subsequent tele-conference discussions with project staff at the Huntington District helped to screen alternatives and make informed decisions. Public hearings conducted in April 2007 were also helpful in gaining insights about the building's perceived evolution, recent treatment, and potential sources of additional information.

As treatment options were identified, all decision making was guided by federal historic preservation standards, and by the intent to uphold the National Register listing of the Jenkins House. In order to ensure consistency in the identification of treatment options, an evaluation framework was needed, based upon the premise that all actions adhere to the federal definition of preservation stated above. More specifically, the appropriateness and success of potential options were gauged against the following criteria, though not all apply to each subject area:

1) Expends funds solely on the preservation of existing original fabric (house) by arresting ongoing or imminent degradation.

2) Reverses a non-historic intervention that has compromised the physical status and longevity of the house, and in turn supports historic integrity.

3) Provides an accurate record of the building's design, materials and features in anticipation of future loss and the need for replacement or replication.

4) Does not jeopardize National Register values or interpretation of archaeological features.

5) Does not compromise other historic fabric or that of associated historic properties, or foreclose on long-range preservation goals and possible restoration.

[1] In "Black Folks at Green Bottom - From Slavery to Freedom on the Ohio River," Stuart McGehee provides an overview of what is known about the African American contribution to the Jenkins plantation.

6) Does not introduce non-contributing elements or characteristics to the site and landscape that have the potential to further erode the building's integrity of setting, association, and feeling.

7) Stabilizes significant character defining features and fabric that may be repaired or restored, should additional historical documentation and funding become available.

8) Applies available funding to support the building's historical values in an immediate and measurable way; and avoids the use of funds for actions that have no immediate and tangible benefit to the building's physical and landscape values.

4. IMMEDIATE ACTIONS

The following preservation subject issues are critically impacted by "water penetration." Each subject has been identified as prone to past and/or ongoing degradation via water access – or has been identified as a pathway for building degradation – due to rainfall or moisture infiltration acting on the historic fabric and features of the house. Water access issues are therefore, primary concerns presented here for immediate attention.

4.1 Gabled Dormers

Significance

Before moving west and building the subject property, William Jenkins, builder of Jenkins House, had previously lived in a sprawling two-story home that sported a series of dormer windows along the front elevation. Still, physical evidence suggests that the current dormers were not part of the Federal style home he created at Green Bottom, and were in fact, added long after the targeted period of significance (1835-1860). The features are also referenced as anomalous in the National Register nomination for the Albert Gallatin Jenkins House (1977); and available photographs dating from the two decades around the turn of the nineteenth century indicate the dormers were added sometime between 1885 and 1915 (Figures 4 & 9).[2]

Several aspects of the dormers support their non-original status. For one, units do not reflect the same academic understanding of the Federal period as do other building features, scales, and proportions. Their staggered placement between lower windows breaks the tight symmetry and visual alignment found on the rest of the Federal composition. When used on true Federal style buildings, dormers were placed directly above lower window openings, and feature gables with well defined moldings and solid pediments, as well as window sashes, instead of casements.

Overall, the Jenkins House dormers defy the well measured classical relationships established through the rest of the building. Finally, the relatively poor craftsmanship of the dormers and anachronistic framing materials (post-1880 drawn wire nails, dimension lumber bearing circular saw marks) are entirely inconsistent with the hand cut nails and lumber, and pegged joinery of the attic space, and with the rest of the home's fine period hand work.

[2] This estimation is supported by the popular trend of the Colonial Revival style just after the turn of the nineteenth century that compelled many home owners to embellish their properties with colonial details such as columned porches and dormers.

Recommendation

It has been shown that the dormers lack a sound association with the period of significance or with any other known historical event of merit. Structurally deficient, they lack flashing at roof junctures, and the casement windows themselves are damaged in many places and unable to close with a tight seal. All of these factors have conspired to permit water into the attic of the house. In addition, because the features exhibit poor craftsmanship and project awkward junctures that are disharmonious with the rest of the Antebellum design, they undermine the

Figure 1. *On the North elevation, the awkward placement of dormers disrupts the alignment of the Federal window program below (author).*

Figure 2. *Side by side comparison of a typical Federal style dormer (Green Hill Plantation, Virginia) and a Jenkins house dormer, right. The Jenkins dormer has uncharacteristically crude framing and pediment glazing, and the gable lacks strong classical moldings expected of Federal style buildings. Poor construction allows a number of cracks and openings where water penetrates.*

simplicity of the Federal style house. Most importantly, because the dormers admit rainwater, there is no justification for repairing and retaining them, and their removal is therefore recommended. Removal should be undertaken as a deconstruction in order to prevent any damage to the original fabric of the attic. Once removed, resulting voids will require patching.

Although the existing roof decking is not original to the period of significance, and is likely a secondary replacement system, repair and infill of the dormer voids should be consistent with the present decking in terms of wood type and dimensions, and placement and application. Maintaining the current placement of decking, with open spaces between boards will also encourage proper ventilation and allow new roofing to dry after heavy rains and periods of high humidity.

Before removal, the present conditions of the existing dormers and their placement should be captured on architectural drawings prepared according to standards of the Historic American Buildings Survey (Section 5.3). Front elevation drawings should record their placement, design, and detail.

4.2 Roofing

Significance

To date, little solid documentation has emerged to verify the nature, materials, dimensions, texture, depth, and profile of the original roofing materials. It has been determined that the current roofing materials rest upon a later replacement decking consisting of spaced milled boards over which asphalt shingles have been laid. Speculation about the original roof on the Jenkins House can be drawn from what is known about typical materials and roofing systems for the period of significance and likely application for this region of the country.

Metal roofs, particularly standing seam metal roofs, were common to Federal style buildings of and were being used at the time of the Jenkins House construction. They became especially common, beginning in the 1870s, and were composed of copper, lead, tin-coated iron, and terne-coated steel, often cast with decorative imprints. Terne, an alloy of lead and tin, was especially desirable for its low cost and excellent corrosion protection for steel. As steel production became automated at the start of the twentieth century, more affordable roofing options evolved, the cheapest being flat steel sheets stiffened at ridges and dipped into molten zinc to fend off corrosion.

Given the chronology of the Jenkins House, it is highly probable that the home's original roof had deteriorated by the late nineteenth century, during the period in which these inexpensive metal options were widely available. A photo of the Jenkins House dating to 1906 depicts a roof cladding that, while not fully readable, suggests six rows of a material that may be metal or board roofing (Figure 4).

Although metal or board roofing may have been used to replace the original roof around the end of the nineteenth century, metal or other materials such as slate were not recovered in archaeological investigations. Regardless, it can be credibly determined that the original roofing material for the period of significance would likely have been wood shingles, possibly of local oak. This conclusion is mostly supported by the archaeological record in and around the site.

Figure 3. *Two examples of late nineteenth century textured tin shingles found on Virginia houses. The circa 1906 photo of the Jenkins House (below) depicts a replacement roof with a similar use of metal shingles, applied as flat sheets stiffened at ridges with a protective material.*

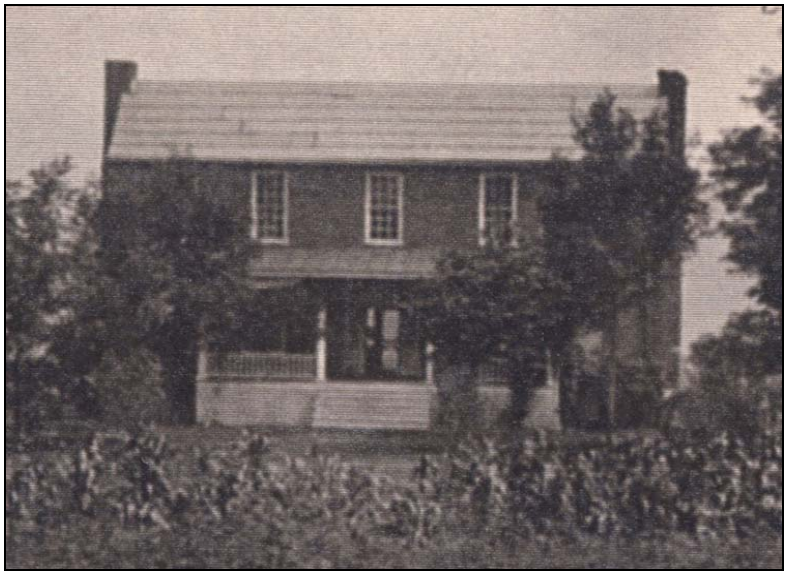

Figure 4. *The only photograph currently available that reveals the status of the roof during the home's brief occupation by the F. A. McDonald family between 1905 and 1906. The dormers had not yet been installed. Although the image depicts six rows of roofing material with some texture, it is not clear whether this cladding was wood shingle, wood board, or metal, however the evenness of the horizontal lines and the wide vertical size of the rows suggest metal.*

Recommendation

The current roofing system is nearing the end of its effectiveness, and its replacement is one of the most immediate and critical preservation needs facing Jenkins House and its survival. Although regional prototypes from the early nineteenth century buildings provide clues, selecting a replacement roof for the Jenkins House will be conjectural to some degree. Further review and

evaluation of the historic archaeological record may still indicate the original roof type, materials, and application.

Roofing options for this plan have considered historical compatibility and cost effectiveness with regard to durability and performance. At this time, it is recommended that replacement roofing achieve an appearance that matches the color, texture, pattern, dimensions, and overall appearance of wood shingles. Strong consideration should be given to using actual wood shingle materials with an appropriate and breathable decking system. However, the Corps' mandate to reduce future maintenance may compel the selection of an alternative material in order to use public funds in a manner that will meet federal preservation guidelines and produce a long lasting result. Such a decision will be based upon the Secretary of the Interior's Standards for the Treatment of Historic Buildings and Structures, which allow for the use of appropriate replacement materials where original materials no longer exist or are not entirely known.

4.3 Masonry – brick, stone, mortar

Significance

The property's walls are constructed of locally fired and molded bricks laid in a Flemish bond, and resting on a sandstone foundation of hand cut, dressed, chisel-faced ashlar blocks. Original brick mortar joints are discernible in places and appear to have been simple struck profiles. Over the years, most joints have been re-pointed at various times, most recently using a cement-based mortar of inappropriate compression strength. The differential between mortar and masonry strength has caused a measurable difference in the way both materials perform. For example, moisture contents are no longer in harmony with adjacent mortar, causing accelerated water passage through brick and stone. Furthermore, the "airtight" nature of the cement-based joints thwarts some of the natural exchange of air between inside and outside walls, causing further build up of interior moisture.[3]

Historical documentation in the form of historic photographs dating from the late nineteenth century reveals that original brick surfaces were left unpainted, bearing only the red brick appearance. Original mortar for the sandstone blocks is believed to have been finished as ordinary struck joints. The white painted surface of the brick dates from the early to mid twentieth century, and was likely an attempt to mask discolored or deteriorated areas, cracking brick, or failing mortar, or to project the colonial revival style popular after 1900.

Interior basement walls are presently finished with smooth plaster, although sampling and examination suggest that these walls were originally exposed stone. Fireplace openings framed with later blond brick hearths are believed to be part of the modern refinishing of these spaces.

Recommendation

The stability of the building's walls and foundation is essential to the overall preservation of the home's historic fabric and to the longevity of the property. Therefore, immediate actions should be taken to arrest ongoing masonry deterioration, and to repair and maintain these walls. Comprehensive testing and analysis of the brick and stone units, and mortar was undertaken by U.S. Heritage Group in August 2007, including identification of a successful paint

[3] The U.S. Heritage Group report addressed the relative moisture levels of brick, stone, and mortar.

removal/cleaning method. Mortar and masonry sampling on all elevations was conducted to assess moisture content and potential capillary or other water migration issues, and to formulate a compatible replacement mortar mix with respect to compressive strength, sand and aggregate types and ratios, and texture and appearance. The resulting data and reporting informs the repair work that should be undertaken on mortar joints and brick repairs to chimneys.

Based on the findings of the report, the field application of mortar (re-pointing) should be conducted under the direct training and supervision of contracted experts in masonry restoration and conservation. Mortar preparation should be performed off-site with a standardized

Figure 5. *Masonry analysis conducted in August 2007 identified problems associated with painted brick, and involved several test patches to determine the most successful paint removal solution (left, center), and also noted mortar damage from water erosion and leaking downspouts. A suggested mortar formulation for re-pointing is included, with recommendations for preparation and application. (author)*

Figure 6. *An end chimney on Green Hill Plantation House, Virginia terminates in a typical Federal style corbelled cap (left). Similar capping reconstruction is recommended for both chimneys on the Jenkins House (right) in order to deflect water away from brick surfaces below.*

methodology to ensure consistency of the formula, again, under the guidance of expertise obtained by the Huntington District. All applications should be made within a defined, contracted period under consistent weather conditions and temperatures. Mortar joints should be struck in the same manner of original joints with respect to contour and profile.

Because the home was not painted during the period of significance, it is recommended that the white paint be cleaned (removed) to return these walls to their original appearance. This approach is justified in several ways. The paint coating is blistering and flaking in many areas. Paint bonded to fired brick surfaces can act as a moisture trap, introducing an impermeable layer that prevents surfaces from breathing and releasing moisture. Where paint may adhere to brick, there is the potential for the original fired surfaces to be pulled away as the paint erodes. Continuing to paint the brick would build additional paint layers, and poses a risk to further entrapment of moisture and ensures an ongoing need for repainting.

Masonry testing and analysis by U.S. Heritage Group concluded that the upper sections of both brick end chimneys should be rebuilt and missing caps replaced. The recommendation is based upon evidence of destabilized brick leaning outward, structural weakness, and badly eroded surfaces and mortar joints. Both chimneys presently terminate without any capping, leaving no diversion for water away from surfaces. Although no strong photographic or other documentation is available to verify, chimneys most likely extended slightly farther, terminating in simple Federal caps achieved by corbelling brick to create a "lip." It is therefore recommended that replacement caps be constructed in this manner (see Figure 6).

Regarding the potential for indirect moisture effects on the building's masonry, consultation with the Ohio state climatologist in 2007 determined that nearby wetland moisture is not acting on the home's brick and stone surfaces in any appreciable way. Conclusions were based upon atmospheric flow patterns and known environmental factors in the Greenbottom locale.[4] Finally, the issue of potential water penetration migrating from the ground upward was addressed in 2007 through groundwater testing. This assessment built upon earlier data obtained in 1992 and 1995 that concluded there was no evidence the water table had been elevated by the presence of wetlands. The latest effort included comparison of the earlier data, and current site observations, and borings to identify subsurface water levels. These results showed consistency with the 1990s investigations, as no potential water encroachment from the water table was indicated. Groundwater levels and capillary action in soils were established to be well below contact with the basement floor (approximately 6 feet below).[5]

4.4 Windows

Significance

Because of the building's simple design and composition, the windows represent one of its most prominent character-defining features. The window formats throughout the house include nine-over-nine, double-hung sashes, fixed, attic quarter windows, and casement windows in the raised

[4] Opinion related to the Huntington District by Dr. Jeff Rogers, Professor of Geography and Atmospheric Science, State Climatologist, The Ohio State University, Columbus, Ohio, U.S. Army Corps of Engineers, Huntington District, 8 October 2007.

[5] "Evaluation of Potential Effects of Wetlands and Groundwater on the Jenkins House," prepared by the Soils Engineering Section, Huntington District, U.S. Army Corps of Engineers, August 2007.

basement. The current nine-over-nine sashes are not original to the house. Installed in the early 1990s as part of a rehabilitation effort, these double-hung units were based upon the general format of the windows in place at the time, which were single-hung units reported to have replaced the original windows.

Historic photographs dating from the late nineteenth century through the early part of the twentieth century indicate the original windows were sashes with a nine-over-nine configuration, incorporating slender glazing bars and surrounds as was typical of the Federal period. One photograph suggests the sashes were painted a light color, perhaps white. Another photograph indicates that the gable end attic quarter windows may have had a grid-like muntin pattern. Unfortunately, complete documentation in the form of drawings, notations, or detailed photographs have not been identified to guide appropriate window replacement actions.

Recommendation

The Jenkins House has a total of eighteen nine-over-nine, double-hung window sashes, known to have been installed in the 1990s rehabilitation effort. Current analysis shows that some units are performing adequately (operational and water/air tight). All upper and lower sashes should be examined to identify types that may be original, or secondary units (ca. 1935), and those that are functioning poorly and causing exterior and interior deterioration of building fabric. Should it be decided that window deterioration is not critical at this time, inventory data, including close-in photographs of glazing bars/muntins and molding profiles, and framing types should be undertaken to guide future replacement when needed. Any original units will be preserved and used as templates for replacing non-original windows identified during the inventory.

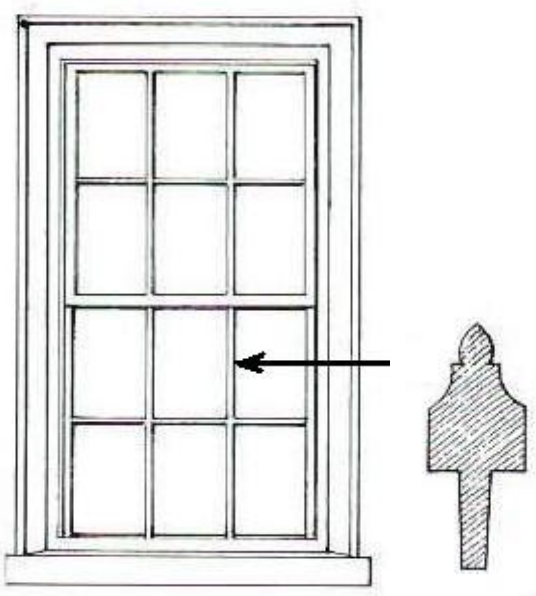

Figure 7. *Typical Federal style sash window and cross section detail of a glazing bar with "ovolo" molding profile. Windows on the Jenkins House were replaced in the 1990s with units that generally followed the format of the existing single-hung 9/9 sashes that were reported to have replaced the originals. (Elements of Style, Calloway and Cromley, 1991)*

Although the Secretary of the Interior's Standards and Guidelines for the Preservation and Rehabilitation of Historic Buildings allows some latitude when replacing original features that are missing and when no credible documentation exits, caution should be applied in making replacement choices that do not introduce false or conjectural window types. Because of the building's rare status in the region and its role as a house museum, a more stringent application of Restoration standards is encouraged. Alternative materials – other than wood – may only be appropriate as long as the depth, profiles, and textural appearance of muntins (glazing bars) and frames approximate those found in windows of buildings of the same period.

It is therefore advised that replacement units recreate the known nine-over-nine, sash configuration of the originals, and if possible, reproduce slender glazing bars with Federal style *ovolo* profiles (Figure 7). Overall, new units should reflect a vintage glazing appearance (aged glass if available), and depth, molding profiles, and proportions consistent with similar period window sashes found in this region of the Ohio River Valley and Virginia. It may be helpful to canvas regional buildings for models of appropriate period replacement windows. Only if an alternative material can produce an historically appropriate appearance will the Corps consider non-wood windows in the interest of maximizing public funds for a long lasting preservation result.

4.5 Moisture Infiltration

Aside from direct water penetration, there are other aspects of the home's physical character that encourage moisture flow into building materials. Rising warm air and air drawn upward through chimney stacks can carry moist air into brick walls. The natural air exchange that exists between inside and outside walls can do much to equalize any additional interior moisture accumulation; however climate control, particularly in humid climates will accelerate this build up and complicate the balance. A tightly sealed building may theoretically prevent interior moisture build up, but reality holds that some moisture will enter regardless, and if trapped, lead to condensation and masonry decay.[6]

Until 1988, the house had been heated only by fireplaces and propane units, and was not fitted with HVAC until the WVDNR made use of it as a residence in 1989.[7] The interior temperature of Jenkins House will most likely be regulated for visitor comfort in the immediate future, thereby creating a fairly tight lock on air passage from the indoors to the outside. Therefore, it is essential the attic space be ventilated to ensure that any upper moisture accumulation is dispersed in the natural cycle. Currently, the frames of the quarter round attic windows are not sealed properly and should be repaired to close gaps that permit direct water entry. However, a discreet ventilation opening is recommended for both ends of the house to allow moisture exchange and encourage "breathability." Locating ventilation outlets in the attic should be done with the least visible intrusion to the exterior appearance.

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[6] "Preservation Brief 39: Holding the Line Controlling Unwanted Moisture in Historic Buildings," U.S. Department of the Interior.

[7] Information related to the Huntington District by former resident and owner, Clara Knight, and by Tom Dotson (WVDNR).

5. ADDITIONAL PRESERVATION ISSUES

5.1 Garage/Addition

Significance

Although an exact construction date has not been identified, the addition at the northeast corner of the original house is believed to date to the 1930s. The wood frame, weatherboard sided appendage lacks the masonry (brick) construction of the house, but incorporates stone identical to that supporting the house. The stone materials were likely salvaged from former outbuildings long demolished. Although the stone is assembled in a manner consistent with the house, the style, construction, scale, and placement of the addition detracts from symmetrical architectural format established in the Federal style house.

Furthermore, the structure is not associated with the period of significance. Most importantly, removal would add further benefit by revealing currently concealed walls and enabling paint removal and re-pointing of brick and stone surfaces at this end of the house.

Recommendation

It is recommended that the early twentieth century addition be removed to allow access to masked stone and brick surfaces, and to enable comprehensive and consistent paint removal and re-pointing throughout the house. This measure will also return the building to the stand-alone appearance of the period of significance. Careful removal of foundation stones should anticipate

Figure 8. *Addition looking northwest, showing juncture with original building and use of stone blocks salvaged from demolished outbuildings. (author)*

storing the blocks for re-use, should they be needed for future repairs to the house foundation. Once the addition is removed the brick and stone surfaces of the house will be revealed and accessible for inspection. If the masonry materials exhibit deterioration, repair and re-pointing of mortar joints should be undertaken following methods prescribed for the rest of the house (U.S. Heritage Group).

By exposing this section of the home's exterior, clues may be revealed about past repairs to the masonry and mortar joints, earlier mortar profiles, and brick surface conditions prior to the addition. These hidden walls may, in fact serve as a pre-1930s record of the exterior walls as they existed at that time, before they were "sealed off." Before treatment and repair, these surfaces should be documented in both color and black and white photographs, including close-up details be taken of the newly exposed walls. Mortar samples may also be saved to test the relative condition and moisture levels of these areas as compared to other elevations that have always been exposed. Finally, demolition of the addition should be performed carefully so as not to harm potential subsurface archaeological materials. Strategic vehicle access and equipment placement should be planned to ensure that no major ground disturbance occurs. If significant ground disturbance is necessary, precautions should be made for archaeological monitoring and data recovery, if deemed necessary.

5.2 Second Floor Bathroom

The small 11 feet by 10.6 feet room located directly atop the staircase landing on the second floor was converted for use as a bathroom in modern times. A sink, toilet, and shower provided indoor plumbing in a space originally lacking such amenities, and plumbing for these fixtures has leaked, damaging the flooring and the staircase ceiling below. Although the bathroom has provided a restroom convenience for visitors to the Jenkins House museum, it may be determined that plumbing and water systems require repair and upgrading to halt further gradation to the house. Depending on final site planning decisions, restrooms may eventually be provided outside of the house in a separate facility, making the bathroom unnecessary. Because the modern fixtures and bathroom retrofitting are not in keeping with the period of significance and may be a continued source of water damage, it is recommended that these elements be removed, and the room repaired and returned to its original appearance. Original plaster walls, windows, and door moldings and trim should be recreated based upon the appearance of the other second floor rooms. Any piping holes or intrusions should be repaired and patched in-kind.

5.3 Setting and Landscape

In spite of later changes to the home's setting along the Ohio River bottom, the mostly open character of the landscape, and natural plantings (and perhaps planted vegetation), and overall visual associations make strong connections with the agricultural period of the Jenkins House. Later and modern intrusions such as a state highway, railroad tracks, and neighboring structures are now part of the visual experience and detract somewhat from historic view sheds. At least one mature and potentially significant tree has been removed from the front lawn in recent years. To fully plan for and protect the fragile landscape values that remain, it is recommended that an historic landscape inventory be made of the Jenkins House and its environs. A professional historical landscape assessment can provide further information about current vegetation and plantings, and identify those that may relate to the early historic period and thereby warrant preservation. Such a study could determine, for example, whether trees or plantings may have reinforced sight lines or defined agricultural patterning, or where species may have been chosen, for aesthetic reasons or shade and cooling benefit. Such a study may also yield insights into original social circulation patterns (roads, pathways, fields).

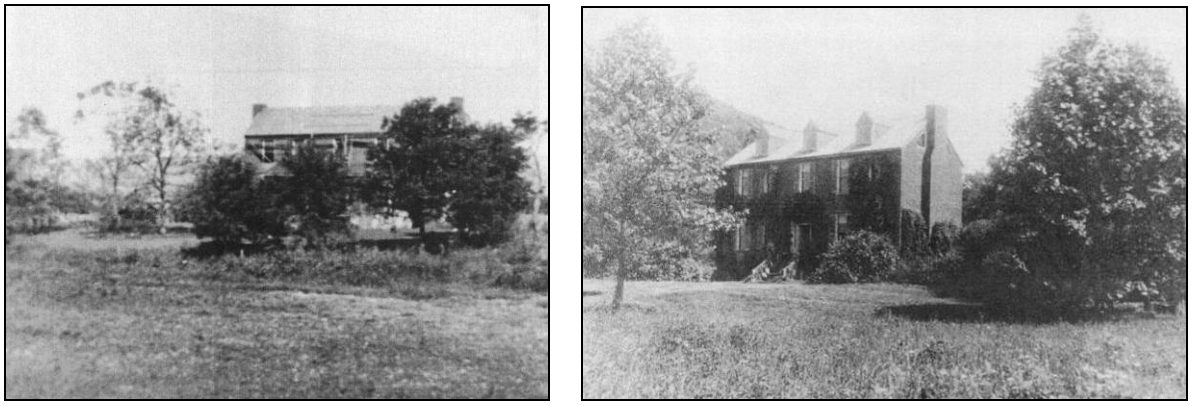

Figure 9. *Two historic photographs of Jenkins House (ca. 1890-1915) show trees and vegetation that may or may not belong to the period of significance. A cultural landscape evaluation can answer questions about the type, maturity, and placement of natural or intentional vegetation. (Huntington District, U.S. Army Corps of Engineers files)*

5.4 Documentation – Mitigating Potential Loss

Aside from what is revealed in the house itself, the historical record normally found in photographs, drawings, notations, and oral histories is sparse and currently insufficient to guide restoration work that may be needed in the future. The threat of a catastrophic event such as a flood or fire underscores the need for accurate documentation to graphically capture the home's existing conditions. Measured drawings of all elevations and details prepared to standards of the Historic American Buildings Survey (HABS) are recommended so that significant character defining features can be replicated with authenticity. Drawings should be prepared to document the existing condition and appearance of all building elevations, and representative building features and details should be drawn at close scale. Targeted features should include both front and rear entryways and surrounds, chimneys, all windows, including basement casement units and attic story windows.

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Figure 10. *Jenkins House, north elevation. Example of measured elevation drawing to document and record original materials, scale, proportions, and features for restoration efforts when needed. (Huntington District, U.S. Army Corps of Engineers, August 2007)*

Figure 11. *The first floor, east fireplace surround (left) was salvaged from a local property and installed in the 1990s.[8] However, because it lacks the delicate classical proportions of the home's other Federal fireplaces (right), the unit should be replaced, based upon drawings prepared for original surrounds. (author)*

Figure 12. *At left, a well preserved interior door frame from Dan's Hill, Virginia, reveals that the west room entry details at the Jenkins House are faithful to the Federal design period, and can serve as an original template for the restoration of interior finish details, when needed. (author)*

[8] Related by Karen Nance, personal correspondence to the Huntington District, U.S. Army Corps of Engineers, April 2008.

Examination of interior spaces reveals an array of features – moldings, door framing, and fireplaces – that points to a repair and rehabilitation effort that may have followed severe floods of the 1800s, turn of the nineteenth century and 1930s. If flood waters rose into the first story, it holds that some of the lower woodwork and plaster was damaged beyond repair and required replacements. A number or door frames and casings are indicative of 1930s-era carpentry and design, though much of the original fabric survives.

Figure 13. *The anachronistic door framing detail (left) suggests that some first floor moldings have been replaced; while others (right) survived as representative of original design. Such original moldings and framing details should be captured in measured drawings. (author)*

Figure 14. *Deteriorated front and rear entrance details such as these pilasters should be documented to guide the authentic replacement of these features. (author)*

Among the original features, representative examples should be recorded in measured drawings, including one drawing of a representative interior window surround, pilasters; fireplace surround (one of each type); and interior back stairway. In addition, black and white photographs (at least medium format) should be taken of exteriors and interiors, to include the house in its setting and landscape, and close-in details of both exterior and interior features of significance to support the record. This documentation package will safeguard the authentic appearance, measurements, proportions, and design qualities of original components, should any of them be lost to gradual deterioration, or to flooding or other catastrophic event.

5.5 Safety and Hazard Considerations

Electrical, and heating and cooling systems have been utilized in the Jenkins House for several decades, and depending on final site use decisions, may remain in service. An evaluation of these features was conducted to identify any needed upgrades or repairs to ensure that the physical fabric of the house is not threatened by potential malfunctions.

Although the house reflects several periods of electrical upgrading, it was concluded that many electrical fittings are functioning in concert and pose no fire hazard to the house. However, a number of issues should be addressed to offset fire hazard potential posed by improper functions or aging systems. These are the findings and recommendations of Huntington District staff for addressing electrical safety concerns.[9]

Priority Mitigation Issues

1. The electric hot water tank near the panel board is covered over with empty cardboard boxes that may pose a potential fire hazard. It is suggested the area always be kept clear by the museum staff.
2. The breaker for the hot water tank is tripped and should be assessed for cause.
3. The addition where the panel board is located has an open junction box and an open fused toggle switch box with extremely old wiring. A voltage was present within the open boxes. Because of the age and brittleness of exposed wiring, it is recommended that all open junction boxes throughout the house be covered. Old brittle jackets on older wiring should be replaced.
4. An old receptacle in close proximity to the bathroom sink on the second floor should be a ground fault circuit interrupter or should be removed if the bathroom fixtures are removed.
5. The service entrance conductors on the line side of the meter do not appear to have a weather-tight seal on the meter's enclosure. These should be replaced with weather-tight fittings, or a conduit with a weather head should be installed.
6. The office within the newer addition has a 12A rated copy machine plugged into an inexpensive multi-outlet surge protector plugged into a common receptacle for all loads (computers, etc.). Users should be cautioned not to overload the circuit.

[9] Electrical assessment performed on site by Mike Barbour, electrical engineer, Huntington District, August 2007.

Figure 15*. The front entrance light fixture and rear basement door outlet should be removed to prevent water migration through openings, and oxidation staining and mortar deterioration. (author)*

7. Three light switches that operate the light on the ceiling fan in the first floor dining room are not wired correctly for four-way lighting circuit.

8. The western most room in the basement has conduit running along the north wall that feeds a junction box marked, "feeds room 105." This box and attached conduit should be tightened. The lighting fixture and switch in this room are blue plastic boxes loosely held in place with nails and fed with armored cable. The light fixture's ceiling mounted box is not stout enough to carry this weight and should be improved.

Though unrelated to safety concerns, the present location of certain modern era, exterior fixtures may cause a different problem by enabling water to pass through masonry. For example, the current front entrance light fixture, as well as a rear basement fixture were attached without these considerations, and over time will likely cause some masonry deterioration and interior water migration if left unchecked. It is recommended that non-historic wiring or metal fittings be removed to stop water migration, and to prevent oxidation or erosion of surrounding masonry.

5.6 Cyclical Maintenance

The Jenkins House has endured almost two centuries of climatic effects, direct water penetration, interior temperature regulation, random treatments that have compromised historic fabric, and insect infestations.[10] While some of these intrusions cannot always be avoided, care should be taken to offset any threats that can be reduced by regular maintenance. A maintenance regime based upon "Cyclical Maintenance for Historic Buildings" should be prepared and practiced on a regular basis.[11] Target issues should include thorough examination of building voids and spaces

[10] Serious degradation caused by insects (termites) acting on floor joists and other wood members has now been arrested.

[11] Henry J. Chambers provides a long respected approach to cyclical maintenance in, *Cyclical Maintenance for Historic Buildings.* Springfield, VA: National Technical Information Service, 1979 (Publication No. PB87-118659).

where insect or animal access may occur, removal of dead insect debris, low pressure wash cleaning of surfaces to discourage mold and mildew growth, and cleaning and inspection of gutters and down spouts. Down spouts, in particular should be angled to disperse water at least six feet from the building perimeter. A regular building inspection should note any new water damage issues and scope the source of penetration. Following the initial re-pointing of the entire house recommended by U.S. Heritage Group report, mortar joints should be examined periodically to monitor performance.

The house has survived a number of severe floods that penetrated several feet into the first floor, and to its credit, has performed well since, sustaining no critical damage to major structural members or masonry. In addition to major flood protection actions addressed in the following section (Section 6), proactive measures to minimize potential flood damage are not recommended in this plan because their negative impacts on original fabric and visual qualities far outweigh any flood protection benefit.

Such measures include reconstruction of floor joists with water resistant materials or infusing existing members with waterproofing solutions, removal of first floor plaster and installation of water resistant walls and other waterproof barriers, as well as relocation of mechanical heating/cooling systems from the basement to the upper floors. Removal and replacement of floor joists and wall systems would be potentially damaging to original building fabric. Relocating mechanical equipment would also require invasive new passages for wiring and large equipment installation into the upper floors and the attic, and would thereby introduce non-historic visual elements.

Because flood waters on the Ohio River rise and retreat fairly rapidly, providing additional drainage exits in the basement is not recommended. As with other options, cutting water outlets into the foundation would damage masonry materials and provide new avenues of deterioration, offering little measurable reduction of water penetration and damage. Considered under the preservation standards and evaluation criteria, this and related interventions stand to cause greater harm to the home's historic and architectural values than that posed by a flood event of unknown timing and scale.

However, preparation of a cyclical maintenance plan for the Jenkins House should include recommended treatments to be used following a flood event. Post flood recommendations may include the use of fans and de-humidifying equipment to promote the "dry out" of stone and wood materials. Basement and first floor areas should be immediately cleaned of accumulated flood soil and other debris that could promote rot, moisture retention, or draw insects. In accordance with National Park Service Technical Preservation Brief #1, a low pressure washing of stone and brick surfaces is also recommended to ensure that harmful organic or chemical residues left by flood waters do not act detrimentally on masonry surfaces and mortar joints. Mortar joints should be examined and any failing mortar should be replaced using the same formula and application recommended in the report by the U.S. Heritage Group.

Following a severe flood, a building inventory and assessment should be undertaken to identify immediate and long term restoration and replacement needs. As part of this effort, a schedule should be developed to outline the most vulnerable materials and features that warrant a first

response, as well as less critical issues that can be addressed at a more gradual pace. If implemented, documentation efforts recommended in Section 5.3 can direct any needed restoration of damaged or lost fabric and features.

6. POTENTIAL ACTIONS – FLOOD PROTECTION

The application of flood protection measures to reduce potential harm to the Jenkins House was considered, given the projections for a catastrophic "hundred year" flood event along this section of the Ohio River. Remedies range from external mechanisms, to extreme and invasive actions that would dramatically change the setting and character of the property and its environs. All measures have been evaluated according to their impacts on the National Register listing status of the Jenkins House and in accordance with the Section 106 application of criteria of effects, and using the above set of evaluation standards. Because the immediate landscape of the house has been compromised by a later era railroad, by structures and a highway, and by the loss of key outbuildings that illustrated the full measure of plantation activity, the potential of any one measure to cause adverse effects to the historic landscape is viewed as inconsistent with the Corps' Federal mandate to apply preservation standards that meet the intent of Section 106 of the National Historic Preservation Act. In addition to the Section 106 evaluation of effects provided here, a description of flood proofing costs, engineering feasibility, and environmental considerations are provided in the Environmental Assessment document.

6.1 Flood Wall

Construction of a wall to protect the Jenkins House from a flood would require installation of a twelve to fourteen foot high reinforced concrete wall structure with operable gates to close off water during an event. Based upon typical modeling, such a structure would constitute a dramatic and non-historic intrusion into the building's landscape, a landscape already compromised by the adjacent highway and railroad line that appeared after the period of significance. The only acceptable wall structure for these purposes would be one that is not visible within any of the view sheds that comprised the historic landscape. In addition, any such structure could not be located within, nor penetrate through known or potential associated archaeological sites. For these reasons, and because it is paramount to safeguard the building's National Register status and the significance of associated historic and prehistoric archaeological features, and landscape, a flood wall is not recommended due to potential adverse effects posed to the character of the historic landscape.

6.2 Levee

Unlike the flood wall discussed above, a levee in this context is meant to be an earthen structure that would also function with mechanical components and human operation. Though potentially less intrusive to the historic setting than a flood wall, its construction would, nonetheless, introduce extreme non-historic modifications to the landscape. As a result, the same drawbacks outlined above apply to this option, and it is therefore not recommended.

6.3 Building Relocation

In the last century, the Jenkins House has sustained a number of intrusions to its setting that detract from the historic period of significance. The ability of the house to communicate its original role as an early and substantial agricultural plantation remains dependent upon its physical orientation and location along the Ohio River bottom, and within a woodland environment that existed through the historic period.

Relocation of the building would pose a number of challenges in meeting federal historic preservation standards, as well as the treatment standards applied herein. Chief among these is the National Register position that a property will lose its National Register listing immediately upon moving. A re-nomination of Jenkins House would be required in order to regain its National Register status, justifying that the building's significance was not derived from the original location, and that the new location successfully recreates original qualities of setting, placement, orientation, and relationships with the landscape. In rare instances, a property may seek prior approval to retain National Register listing following a move, however, given that the original setting and location of Jenkins House is intrinsic to its significance, such an outcome cannot be assured (CFR 60.14(a)(1) and (2)). Finally, given the Jenkins House's former relationship with outbuildings now represented in foundation remains, a relocating of the building would sever its critical tie with these archaeological features, a relationship that could not be achieved at another location.

In addition, unlike frame construction, the brick and stone wall materials would likely not withstand a move without harm. Such a move could damage structural integrity and cause realignment problems for the masonry units, and many wall sections would require disassembly and comprehensive re-pointing. For this and for the reasons stated above, relocation of the building to another site is not recommended due to adverse effects posed to the National Register listing, to historic relational values to outbuilding foundations, and to the integrity of original building materials.

6.4 Raise in Place (without fill)

Under certain conditions, historic buildings can be raised successfully out of a flood zone. Essential considerations are the proposed height, effects on original design qualities, effects on the functional interrelationship with former outbuildings, the resulting relationship to the historic landscape, and the effect of the overall visual change in context with other alterations or intrusions to the setting.

Modeling to raise the Jenkins House in place is based upon a three-foot elevation of the stone foundation above the present grade. Although the home's foundation is believed to have accumulated one foot of soil since the historic period, a two-foot additional rise above grade would be considerable. A two-foot increase in height would create awkward visual relationships between the home's basement and the balance of the building, perhaps conferring a non-historic first-story appearance to the basement. In addition, raising the house would mean extending entrance stairs, creating further non-historic relationships with the landscape. Finally, as with moving the structure, raising the building may cause some dislocation or damage to masonry materials and mortar joints.

Overall, the raise-in-place option would pose an adverse effect to the building's historic relationship with the landscape and to immediate access to the front and rear elevations. In addition, the added height would distort the original spatial and functional relationships between the house and the outlying foundation remnants. Perhaps most importantly, raising the house would further detract from a historic landscape already compromised by a railroad line and modern highway. This option is therefore not recommended to be in conformance with federal historic preservation guidelines and standards, or with the evaluation criteria of the preservation plan.

6.5 Raise in Place (with immediate fill)

This option is identical to the previous option, except that fill material would be placed immediately around the perimeter of the house and graded outward to minimize the visual impact of increased height. The measure would also require that the current basement be raised to a level consistent with exterior fill, meaning a loss of the original floor level. Although the added fill and sloping would offset some of the visual abruptness of the added height, a non-historic relationship on the landscape would be unavoidable. The graded fill would likely lend a pedestal-like appearance to the house not seen during the period of significance, and, as with option 6.4, would create non-historic grade relationships between the house and outbuilding foundations. For these, and for all of the reasons stated in 6.4, this option is not an acceptable alternative as it poses adverse effects to the building's historical relationship to the landscape and to former outbuilding locations.

6.6 Raise in Place (with overall fill of surrounding landscape)

In order to achieve this option, the building's original basement level would be lost, as in option 6.5 above. To the further detriment of the home's site integrity and relationship to the landscape, considerable fill material would be added over former outbuilding foundations, thereby creating a dramatically non-historic rise in the character of the surrounding landscape, and further distorting the historical relationship to former agricultural fields. Furthermore, the archaeological foundations would become inaccessible and unable to portray their critical historical link with the house. For these, and for all of the reasons stated in 6.4 and 6.5 above, this option is not an acceptable alternative as it poses adverse effects to the building's authentic relationship to the landscape and to former outbuilding locations.

6.7 Preserve in Place

Projecting the timing and likelihood of a catastrophic flood along the Ohio River is inherently speculative, and measures designed to head off potential damage from such an event are by nature anticipatory. The Jenkins House has performed well under environmental stress and demonstrated that, as with many early nineteenth century buildings, age is not a determining factor in resisting hazards and should not compel unnecessary actions on that basis alone.[12] The arguments for a preventive flood protection measure on the property are not compelling,

[12] In "Integrating Historic Property and Cultural Resource Considerations into Hazard Mitigation Planning," page 2.3, the Federal Emergency Management Agency cautions that older structures should not be perceived as more vulnerable to hazards simply because of age.

especially when a review of the above proposals shows that none is acceptable due to significant adverse effects that would be imposed upon the Jenkins House. These include damage to fragile landscape integrity, disruption of historic functional and visual site relationships, and inaccessibility of valuable archaeological resources. Many of the options 6.1 – 6.6 present shortfalls with respect to the treatment screening criteria identified in this plan, specifically those restated below:

1) Expends funds on extraneous issues and actions, and not solely on the preservation of existing original fabric. **(1.1 – 1.5)**

4) Potentially jeopardizes the interpretive value of archaeological sites and features. **(1.3, 1.5, 1.6)**

5) Potentially compromises other historic fabric or that of associated historic properties, and forecloses on long-range preservation goals. **(1.1, 1.2, 1.3, 1.5, 1.6)**

6) Introduces non-contributing elements or characteristics to the site and landscape that have the potential to further erode the building's integrity of setting, association, and feeling. **(1.1, 1.2 – 1.6)**

8) Would commit funds to actions extraneous to the house that will have no immediate and tangible benefit to the building's physical and landscape values. **(1.3 – 1.6)**

The Jenkins House is known to have experienced three major floods between 1937 and 1948. U.S.G.S. gauge records for this period indicate that water levels in the vicinity of the Jenkins House were high enough to have penetrated several feet of the building's first floor. The streamlined design of some door casings and moldings is consistent with the Art Deco influence of the 1930s-1940s, the period during which these high flood levels were recorded. This suggests that damage sustained from these events may have required replacement of certain first floor plaster walls and features. Although any damage to historic fabric is detrimental, it can be concluded that the Jenkins House lost a relatively small amount of original material in these events. First floor structural elements – sill plates and joists, and stone and brick walls – continue to perform well in spite of inundation, and may have since been compromised more significantly by other factors such as termite infestation.

Proposals to construct a levee or wall, to relocate the house, or raise the building and fill the surrounding landscape may offer anticipatory protection from future flooding. However, a flood threat should be evaluated within the context of other threats posed to the property's physical and historical integrity, or by the harm posed by a protective measure itself.

The integrity of the Jenkins House has already been compromised by roads and railroad lines, and the loss of integral outbuildings that defined its agricultural prominence in the region. Options 6.1 – 6.6 represent highly invasive treatments that would further compromise the National Register values of the Jenkins House and associated archaeological features and landscape.

Weighted against these options, a "Preserve in Place" option offers the most defensible approach for preserving the material and experiential qualities that make the Jenkins House significant as an emblem of early western Virginia agricultural settlement. This approach prescribes certain treatments that prevent, or stem ongoing damage to original fabric and incidentally return the

building to its original appearance. Very importantly, it does not direct funds to be expended on non-preservation actions external to the house.

A Preserve in Place option can be enhanced by a cyclical maintenance plan, to include a set of treatment recommendations for addressing damage or loss, should a significant flood occur. The critical foundation of this approach is a thorough documentation effort that captures and records original design, materials, and features to guide future replacement or rehabilitation, and to discourage historically inappropriate or conjectural treatments in the future.

7. SITE TREATMENT, INTERPRETATION, AND ACCESSIBILITY

7.1 Archaeological Resources

Although this plan is directed to actions that will preserve the historic building fabric of the house itself, it is important to also safeguard the entire National Register listed site and the aggregate values of landscape and archaeological resources that contribute to a larger understanding of the home's relationship to the ancient and more recent past. As discussed, any further erosion of the historic landscape – setting and association – would be detrimental to the authentic story of the Jenkins House, and without the preservation of former outbuilding foundations, the full significance of the Jenkins House would be compromised.

Any actions taken to preserve the Jenkins House should do no harm to archaeological resources, nor foreclose on any future opportunity to create meaningful interpretation of them. The archaeological record beneath and around the house captures the life ways of those who inhabited this region of the Ohio River Valley, prehistorically, and also reveals data about the plantation's zenith of operation. Late prehistoric deposits were identified nearby on the original plantation property and given National Landmark designation to honor their heightened importance. The house also rests upon known prehistoric deposits which have not been fully explored but are components of a National Register eligible archaeological site. Regarding the historic era, extensive archaeological investigations have been conducted to identify the locations of outbuilding foundations and to discern likely functional associations with the Jenkins House.

These investigations have yielded significant data about former building locations, and spatial layout and orientation, and revealed some information about building materials and general building characteristics. Because historic archaeological resources were shown to have the potential to yield value under National Register criterion D, they should be treated and managed as elements of the historic property. The former buildings were essential partners to the house during the period of significance, and their foundations are the only tangible links to the practicalities of daily life, local agricultural patterns, and the African American contribution in this region. These features should be preserved in place to authenticate the interpretive experience and retrieve the archaeological record for the public. Preservation of the Jenkins House should therefore embrace the larger context of the home's original outbuildings, and the agricultural and historical realities conveyed by their foundation remnants.

7.2 Interpreting Site Features

Archaeological investigations of the detached kitchen, suspected slave quarters, office, and privy locations have expanded our understanding of spatial relationships at the Jenkins plantation and

offered further insights into the way the family and its slaves lived and worked. Still, these data do not fully reveal details about the missing buildings' designs, materials, window and door placement, roof design, cladding, hardware, and interior appointments, among others. The historical record of these structures currently is not complete, nor is it sufficient to guide reconstructions at this time. However, by themselves the foundation features are visually powerful and can evoke strong associations when paired with quality historical interpretation.

At some historic sites throughout the country, missing buildings and structures have been reconstructed to achieve interpretive goals or to broaden the historical experience when no other structures survive. Mostly, reconstructions are used when no other structures exist to convey an historical event or pattern of activity, or when recreation of a feature can convey a unique architectural type or function that cannot be understood anywhere else. Finally, buildings and features re-built for these purposes are guided by multiple sources of information such as original drawings and sketches, builder notes, detailed paintings or photographs, and oral history data, as well as thoroughly examined archaeological data.

A review of reconstructions made with the oversight of the National Park Service verifies this methodology for reconstruction.[13] For example, in recent years, reconstruction of the round barn and slave quarters at Mt. Vernon, Virginia was based upon George Washington's correspondence, drawings of the polygonal structure, plantation records, bills of sale, and a later photograph, as well as archaeological excavation of building sites. This data made authentic replicas possible, and enabled a fuller interpretation of Washington's skills as a farmer, businessman, and problem solver.[14] In the Pacific Northwest, the most recent reconstruction of Fort Clatsop, following the 2005 destruction of the original replica building, was similarly guided. Thomas Jefferson's instructions to the Corps of Discovery ensured that Lewis and Clark made accurate and detailed notations of all their endeavors, including their 1805 winter lodging known as Fort Clatsop. Their journal sketches and notations provided buildings dimensions, measurements, discussion of materials, and sketches depicting the locations of window and door openings and other features.[15] In this case, no structure existed to commemorate this pivotal moment in the explorers' journey, making a recreated fort building key to visitor understanding.

Another defining moment in the reconstruction debate took place around the potential to reconstruct long gone buildings associated with the Whitman Mission National Historic Site (Whitman massacre site) in southeastern Washington State. Decades of controversy swirled as local advocates, academics, and National Park Service leaders pushed both for and against reconstructing buildings where little evidence existed. A final archaeological analysis yielded some building locations and cultural deposits, though many voids remained in the record of what these buildings actually looked like and how they were constructed. In 1973, the dispute over the replication of buildings was laid to rest after all studies and professional opinions concluded that new buildings could not be erected with accuracy.[16]

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[13] The "Pithcathley Files" is a National Park Service record of historical reconstruction projects undertaken in the United States and Canada.

[14] Information about archaeological projects and historical reconstructions are described at the official Mt. Vernon website: http://www.mountvernon.org/learn/pres_arch/index.cfm/

[15] Frederick L. Brown, "Fort Clatsop Imagined," Oregon Historical Quarterly, Winter 2006.

[16] In "A Feasibility Study on Historic Reconstruction (Whitman Mission)" Erwin Thompson of the National Park Service, Denver Service Center Historic Preservation Team, formerly from Whitman Mission, stated, "The archeological, historical, and architectural data do not exist for anything but a conjectural reconstruction of the mission house, blacksmith shop, emigrant house, and gristmill."

Federal preservation standards for reconstruction (*Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings*) are explicit, and caution against re-building when historical documentation is not adequate. They are intended to discourage new buildings that are conjectural, and have the negative consequence of distorting the historical experience and misinforming the public. Among the federal standards, the following apply specifically to Jenkins House and future site planning:

Definitions:

1) Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.

2) Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archaeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction.

4) Reconstruction will be based on the accurate depiction of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.

6) Designs that were never executed historically will not be constructed.

Not Recommended:

- Reconstructing a building unnecessarily when an existing building adequately reflects or explains the history of the property, the historical event, or has the same associative value.

- Undertaking a reconstruction based on insufficient research, so that, as a result, an historically inaccurate building is created.

- Basing a reconstruction on conjectural designs or the availability of different features from other historic periods.

- Reconstructing features that cannot be documented historically or for which inadequate documentation exists.

- Giving the building's site a false appearance by basing the reconstruction or conjectural designs or the availability of features from other nearby sites.

- Changing the spatial relationship between the building and historic site features, or reconstructing some site features, but not others, thus creating false appearance.

Further complicating the reconstruction of out buildings at the Jenkins House is the lack of a local prototype for modeling. Only the most basic assumptions can be made regarding the arrangement of these buildings. Researchers of plantation architecture have observed a consistent pattern in the manner in which the land owner's house, slave quarters, and outbuildings were organized in order to reinforce social hierarchies and economic symbolism. That is, the "big house" occupied by the owner's family was prominent on the landscape and architecturally sophisticated, while the buildings housing slaves and utilitarian activities were

clearly subordinated, both in placement, size, profile, and design.[17] Among the first colonial plantations of the eighteenth century, distinction was achieved by lavishing a high style design on the owner's home, while slaves built houses reflecting vernacular traits and a use of scavenged materials.

By the early nineteenth century, "lesser" buildings remained modest and often minimally styled, although many owners began favoring greater architectural cohesion, and encouraged the use of formal styling on some outbuildings. However, it is not presently known whether the Federal styling of the Jenkins House was applied with the same vigor to the slave quarters and other structures, or whether the family preferred these to follow a more utilitarian design. Without further information, it cannot be know whether the Jenkins outbuildings assumed a Federal style format in plan, detailing, window and door types, moldings trim, roof type, and interior symmetrical layout.

Regarding building types, Professor John Michael Vlach of George Washington University concludes that plantation buildings reflect regional variations, availability of local materials, variable building skills, and vernacular preferences.[18] Variation also occurred in the decision of an owner to display his slave buildings prominently along a main road in order to display wealth, or to place such inferior buildings well out of sight behind the big house. Therefore, developing a set of prototype plantation buildings for any one locale has proved difficult. This regional variety of building types poses a challenge to the potential reconstruction of long gone buildings at the Jenkins House plantation. While regional building models are occasionally adapted for reconstructing plantation structures, caution should be given to expending funds and effort on approximations that lend no true experiential value when educational and interpretive programs can be more authentic.

Archaeological work has provided information about the associated material culture of former outbuildings that were essential parts of the Jenkins plantation, and the artifacts recovered have yielded data important for a deeper understanding of the historic era of the house, its environment, and the people who lived and worked there. While by themselves these materials are not adequate for guiding reconstructions that meet Federal standards, this plan encourages continued research into the history of the Jenkins House and its outbuildings in order to enhance future site planning decisions.

The archaeological evidence clearly establishes the significance of the sites and foundations that remain, making them National Register eligible components of the larger Jenkins House complex. Their preservation *in situ* is essential for conveying this significance and for interpreting the functional and social relationships between the formal house and the activities surrounding it. It is therefore recommended that the foundations or portions thereof, be exposed or marked, and made visually accessible. Steps should be taken to stabilize these foundations and offset deterioration that may be posed by weather. Interpretive signage explaining what can be authenticated about the nature of these buildings and structures and their roles is essential and will compliment and enlarge the history that can be read in the surviving Jenkins House.

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[17] Patton, Sharon F., African American Art, Oxford University Press: 1998, pp. 25-35.

[18] Vlach, John Michael, Back of the Big House: The Architecture of Plantation Slavery, University of North Carolina Press: 1993.

7.3 Americans with Disabilities Act (ADA)

Depending on interest level and mobility, all visitors will experience the history of the Jenkins House differently. Much of the site and plantation history can be discerned from touring the grounds and viewing the house in its setting. For the majority of visitors, the home's Federal style architectural values may be read on both the exterior, and in the interior features and spatial layout. Some of the home's period character and architectural virtues, however, may limit access to those with physical disabilities. For example, although front and fear entrance doors are sufficiently wide to accommodate wheelchairs – as are interior first floor room passages – outside access to these areas via stairs poses a barrier.

In Preservation Brief # 32, "Making Historic Properties Accessible," the National Park Service provides general direction for adapting historic properties under the ADA. Still, the historical realities of the Jenkins House must inform any decision making about retrofitting the building for ADA accommodation. Most challenging is the goal of providing reasonable access without causing significant harm to historic fabric and the pedestrian patterns related to the years, 1835 – 1860. Typical ADA treatments in historic dwellings that might be applicable to the Jenkins House include wheelchair ramps, placing elevator lifts beside the raised entries, or providing new and discreet entrance points.

Although ground level entry may be viewed as a low impact alternative, providing access through a basement level door is not advised. Cutting in an additional ADA width door opening would damage historic masonry, create a visual intrusion, and confuse historical access patterns. In addition, because a grade-level door would require a ramp dug into the ground and angled outward, this option stands to impact archaeological resources, and would likely require additional mitigation and data recovery. Perhaps most importantly, basement access would offer no tangible experience of the architectural and historic values that remain above, out of reach to the disabled visitor. ADA accommodation into the basement would also necessitate insertion of an ADA compliant elevator/lift to the first story that would consume a large amount of historic fabric and disrupt historical patterns above. Finally, this approach would require relocating electrical and HVAC systems in upper floors, an action not recommended under Section 5.5.

Because the house has a clean symmetrical design, and because all of its elevations are prominent, all of the above options have the potential to critically disrupt an otherwise intact historic building. Making such adjustments could further undermine the building's National Register status, which is already compromised by modern intrusions discussed earlier in this document. Potential adverse effects of ADA accommodation in the house itself are serious enough that visitor equivalences should be pursued, and developed independent of the original building. Quality interpretive opportunities should be made a priority in an effort to bring the history and material qualities of the Jenkins House to those unable to fully experience the entire building. Interpretive programming, possibly in a stand alone and sympathetically designed visitor center, could translate much of the historical imagery and material furnishings associated with the Jenkins family during the period of significance. In addition, the visitor understanding of the history and prehistory of the site could be greatly expanded through easily accessed and clearly marked archaeological foundation sections and accompanying signage.

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- # 2 Re-pointing Mortar Joints in Historic Buildings
- # 4 Roofing for Historic Buildings
- # 17 Assessing Architectural Character of Historic Buildings
- # 18 Rehabilitating Interiors in Historic Buildings
- # 24 Heating, Ventilating, and Cooling Historic Buildings
- # 32 Making Historic Properties Accessible
- # 36 Protecting Cultural Landscapes: Planning, Treatment, and Management
- # 39 Holding the Line: Controlling Unwanted Moisture in Historic Buildings

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Appendix B

Flood Risk Reduction Details
(Description and Engineering drawings)

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1. Floodwall

This alternative entails placing a T-Wall around the grounds with a gate closure at the entrance drive. The top of wall elevation would be 562.0, making the average height of the wall 14 feet above existing ground. Approximately 1,210 linear feet of wall would be needed. A storm drainage system including catch basins, pipe, portable pumps, and headwalls would be required. The edge of the floodwall would be range from 70-260 linear feet from the perimeter of the Jenkins House. Additional operation and maintenance would include pump mobilization and demobilization, pump upkeep, and the gate closure. (See Exhibit CGA03).

Figure B.1. Simulated floodwall surrounding the Jenkins House.

2. Earthen Levee

Approximately 1,340 linear feet of levee would be needed to surround the Jenkins House, using 32,500 cubic yards of fill. The levee would be comprised of a 10 foot wide bench at elevation 562.0 with 1V:3H (one foot vertical to three feet horizontal) side slopes, making the average height 14 feet. The base of the levee would extend 42 feet from each side of the 10 foot wide bench, accounting for an average total base width of 92 feet. A storm drainage system including catch basins, pipe, portable pumps, and headwalls would be required. The centerline of the proposed levee alignment would be offset from the Jenkins House at a distance ranging from 70-260 feet from the perimeter of the house. (See Exhibit CGA04).

3. Raise in Place with 2 ft fill

This would involve raising the house as described in Alternative 3, and backfilling around the house to achieve an approximate contour of the existing site. Two feet (2') of random fill would be placed around the house to bring the ground elevation to 556.0. The slopes from top of the new fill to the existing ground would be 9%. Approximately 700 cubic yards of fill would be needed. (See Exhibit CGA02).

4. Raise in Place with 7 ft fill

This alternative was considered as a result of public interest in considering raising the entire structure and site above the 100-year flood elevation. This alternative entails raising the house seven feet (7') on block and placing seven feet (7') of random fill around the house to bring the ground elevation to the 100-year flood elevation (561.0 amsl). There would be a ten foot (10') wide bench around the house. The slopes from top of the new fill to the existing ground would vary from 15% to 17%. Approximately 6,000 cubic yards of fill would be needed. No additional maintenance would be required. (See Exhibit CGA01).

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Appendix C

Public Scoping Comment Summary

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Table C.1 Public Scoping Comments and Consideration of Issues. Public scoping comments were used to develop issues considered in the Environmental Assessment (EA) and Preservation Plan (PP). All comments were reviewed and categorized into issues based upon similarity. The following table outlines "Issues" identified from scoping comments with specific "Comments" grouped under each issue. The "Consideration of Issues" column directs readers to the location in the EA and PP where pertinent preservation issues are considered, or where appropriate how a comment may be addressed. Issues that relate to the current Preservation undertaking are primarily considered. Issues outside the scope of this preservation planning effort are referenced as N/A, for future reference and availability.

Issue		Comment	Consideration of Issues
1	**Flood Damage**		
		Why is there a flood threat (has house been flooded)?	See Section 3.2 of the EA and Section 6 of the PP.
		Raise out of 100 year floodplain	
		Dikes around plantation would be more accurate of preserving grounds, any other option would detract from historical value	
		Last time house flooded (1997) resulted from water backing up into house through pipes, not Ohio River	Backflow prevention valve now in place to eliminates concern.
	No Action		
		Allow house and buildings to be flooded. Cost for cleanup and repair would be more cost effective than floodproofing.	See Section 3.2 of the EA and Section 6 of the PP.
	Relocation		
		house should stay where it is (original location)	See Section 3.2 of the EA and Section 6 of the PP.
	Raise-in-place		
		Raise-in-place idea is a possibility	See Section 3.2 of the EA and Section 6 of the PP.
		If nothing else could be done, then raise-in-place	
		All three floors should be raised, if Corps determines its needed	
		Raise-in-place appears to be the best option	
		Raise in place as long as integrity of house protected	
		All three floors should be raised	
	Raise-in-place on Fill		
		Whole house should be raised out of 100-year floodplain so whole knoll can be raised	
	Levee/Floodwall		
		Investigate bulldozing a barrier to stop occassional flood, but not a floodwall	

Issue		Comment	Consideration of Issues
2	**Water Penetration**		
		Moisture problem from wetlands in front of house damages brick and encourages mold growth	See EA Section 1.4. Only those studies pertinent to the scope of preservation were conducted: Masonry Condition Assessment, Groundwater Analysis, Climatology Consultation.
		Raising does not address site drainage and moisture problems	
		Moisture problem from wetlands in front of house damages brick and encourages mold growth	
		Water table is too high because of wetlands, and causes moisture damage in house	
		Remove wetlands to eliminate moisture problem	
		Mildew problem arose following Corps ownership of the building and construction of weltands	
		Creek should be cleaned out behind house to allow proper drainage	
		Reroute wetlands to eliminate damage to house	
		Poor site drainage in front of the house has resulted from installation of culverts under the railroad and Rt. 2.	
		Stone foundation eroding from increased dampness	
		Drainage study should be done to identify hydraulic concerns surrounding house (Turkey Creek backing up)	
		Drain all water away from house	
		Gravel and dirt washed in from railroad culverts should be used to construct an earthen levee to keep flow within Turkey Creek	
		Site drainaige would be improved by removing railroad drains and installing culvert to direct flows into Turkey Creek	
3	**Cyclical Maintenance**		
		Proper cyclical maintenance is needed to ensure preservation	See PP Section 5.5
4	**Document and Repair**		
		Not sure back door is period.	Documentation effort captures existing conditions (EA Section 1.4.) Current efforts guided by Standards (EA Section 2.2)
		Window sashes are not original, cannot keep paint on them or front steps	
		Past preservation activities have not met Secretary of Interior Standards (i.e. roof and window replacement)	

Issue		Comment	Consideration of Issues
5	**Historic Associations**		
		Moving the house could cause it to lose its National Register nomination	See EA Section 3.2, and PP Section 6.3
		Relocating would affect the integrity of the house	
		Relocation would change historic setting and status	
		Landscaping could mask effects of raising structure	
		All three floors should be raised, because of antebellum architecture basement is considered first floor.	
6	**Archaeology**		
		Additional testing around house entries and front windows likely to reveal evidence of porches	See Preservation Objective 4 (EA Section 2.1) and its consideration throughout. See PP Section 7.1
		Concern regarding Late Prehistoric component along northern wall of kitchen with wall trench house pattern associated with midden	
		Site burial would preclude further understanding of outbuilding features (Office, privey, sidewalks, etc) that are not yet well understood	
7	**Wise Investment**		
		Preservation work should be done with an eye towards restoration. Money spent towards preservation should complement future restoration.	See Preservation Objectives 1 and 8 (EA Section 2.1) and their application throughout.
		If roof is replaced, wood shingle roof should be put on instead of asphalt to save time/money when restoratin proceeds.	
		Allow house and buildings to be flooded. Cost for cleanup and repair would be more cost effective than floodproofing.	
8	**Public Benefit / Interpretation**		
		Raising would allow for display of artifacts without fear of flood damage	See definition of Preservation (Section 1 of PP and EA). ADA Access in PP Section 7.3. Suggestions noted, and available for future use.
		Can handicap accessibility be added?	
		Visitor center should be kept in mind during preservation	
		Full interpretation of the site should include African American and Native American. Current site offers no way to interpret those stories along with the Jenkins story	
		Site has four "magnets" to attract visitors: Jenkins home, underground railroad/piek experience, Clover Indians, and Wildlife.	

	Issue	Comment	Consideration of Issues
9	**Non-Preservation/Other**		
	Wetlands		
		Wetlands provide important wildlife habitat (food and cover for waterfowl) and should not be removed	See EA Section 1.4. See masonry discussion in PP Section 4.3. Comments noted.
		Water in front of house should be removed. It was not there in 1988.	
		There's a goose problem. Removing water would eliminate goose problem.	
		Remove wetland	
		Swamp was never planned when Corps took over house and land for mitigation in 1988.	
		Property in front of house was already a seasonal wetland, prior to wier construction and conversion. It should be restored to previous state.	
		Beavers appeared following Corps acquisition of Jenkins property and built dams on Turkey Creek that flooded farm fields used for corn, hay and cattle	
		Beaver dams near Jenkins property should be removed and beavers relocated	
		Wetlands detract from interpretation of historic (agricultural) property	
	Restoration/Reconstruction		
		Full restoration w/ outbuildings would allow full interpretation of the Plantation	Noted for future use. See PP Section 7.2.
		Reconstructed outbuildings could be raised to railroad elevation	
		If house is raised, outbuildings should also be raised	
		Wetlands adjacent to the house could be replaced somewhere else on the 900 acre site to allow for restoration of the front lawn and plantation setting.	
		Rebuild outbuildings on original location to help with tourism and education	
		Remove office, revert bathroom, outbuildings with plaques, etc.	
		House should be restored with room for permanent museum for full prehistory and history display	
		No additional structures should be reconstructed (wharf, kitchen, office, etc). Historical and archaeological evidence is inadequate at this time to support accurate depiction.	
		Restore similar to Blennerhasset	
		Restore to original brick	
		Paint house	

Issue		Comment	Consideration of Issues
		Restoration process excellent teaching opportunity if conducted by historic restoration professionals	Noted for future use. See PP Section 7.2.
		Historic Hannan's bridge, and old farm road to river should be reconstructed following rerouting of wetlands	
	Tourism		
		House would draw conventions and tourists	Comments noted and available for future.
		Additional access road (upper farm road above current entrance), not connected to the RR track could be added to accommodate additional visitors	
		Guyandotte Civil War Days draws reenactors and other people to the area. Greenbottom is a great place for this. People are interested if there's a place to come.	
		An Interpretive Area could be used for "drawing" activities following house restoration and outbuilding reconstruction.	
		Build a gift shop	
	Public Use/Interpretation		
		Opportunities for students and young people to experience historic plantation setting	See PP Sections 1and 7.
		Currently no interpretive reenactment events in Cabell County for students and education. Events in other locations, but education opportunities are here.	
		Potable water and utilities would be needed to accommodate large public gatherings. Currently no potable water and one toilet, water and sanitation should be considered.	
		Visitor center could be used as visual representation of barn (agriculture)	
		No drinkable water available, only restroom is on second floor	
		Visitor/interpretive center should be added	
		Wetlands add charm to the site	
		Safe hiking trails (afraid of swamps), guided wildlife viewing	
		Safe drinking water is needed	
	Other		
		Hannan's stone arch bridge across Turkey Creek was removed, as a National Register property this was unlawful	N/A to current Preservation effort. Comments noted.
		Diverter ditch that once connected old swamp to Turkey Creek and Ohio River should be re-installed	
		Railroad drains placed under track damage historic property	

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Appendix D

Notice of Availability

US Army Corps of Engineers

Jenkins House Preservation Plan
Notice of Availability & Public Meeting

The Corps of Engineers will hold a public meeting regarding the Draft Environmental Assessment and Preservation Plan for the Jenkins House, Thursday, April 10, 2008, from 6:00-8:00pm at the Greenbottom Community and Senior Center. The Huntington District, U.S. Army Corps of Engineers (Corps) has developed a Draft Environmental Assessment and Preservation Plan (DEA/PP) for the Jenkins House that identifies, evaluates and prioritizes preservation measures necessary to sustain the integrity, original fabric and character of the house. As required by the National Environmental Policy Act, the DEA/PP will be available for a 30-day public review period. The DEA/PP will be distributed for public comment on or about March 26, 2008 and copies may be viewed at the following locations:
Cabell County Public Library, Jenkins Plantation Museum, and
Robert. C. Byrd Lock and Dam Project Office, or online at:
http://www.lrh.usace.army.mil/projects/review/

Comments on the DEA/PP must be submitted to the below address by April 26, 2008.

The Jenkins House is located in a wetland mitigation area of the Robert C. Byrd Lock and Dam project in an area known as Greenbottom, north of Lesage, Cabell County, W.Va. It is currently operated as a house museum by the West Virginia Division of Culture and History.

We Invite Your Participation…

Thursday, April 10, 2008 ▪ 6:00 pm to 8:00 pm
Greenbottom Community & Senior Center ▪ 7863 Ohio River Rd. ▪ Lesage, WV

6:00–7:00 pm ▪ Formal Presentation & Public Comment Period
7:00 –8:00 pm ▪ Informal Workshop Session

If you have any questions or comments please contact:
Amanda Dethman, Environmental Planner
U.S. Army Corps of Engineers ▪ 502 8th Street ▪ Huntington, WV 25701
E-mail: Amanda.J.Dethman@usace.army mil ▪ Phone: (304) 399-5819

Appendix E

Draft EA Distribution List

Elected Officials
Honorable Nick J. Rahall
Representative in Congress
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Huntington, WV 25701

Honorable Robert H. Plymale
West Virginia Senate
P.O. Box 5425
Huntington, WV 25703

Congressional/Committee Interests
Mr. Matt Taylor
Legislative Director
Office of Congressman Rahall
2307 Rayburn House Office Building
Washington, DC 20515

Mr. Jim Zoia
Chief of Staff, Committee on Natural Resources
U.S. House of Representatives
1324 Longworth House Office Building
Washington, DC 20515

Federal Agencies
Mr. Thomas Chapman, Field Supervisor
U.S. Fish and Wildlife Service
West Virginia Field Office
694 Beverly Pike
Elkins, West Virginia 26241

State Agencies
Mr. Adam Hodges, Director of Musuems
WV Division of Culture and History
1900 Kanawha Boulevard East
Charleston, WV 25305

Ms. Susan Pierce
Deputy State Historic Preservation Officer
WV Division of Culture and Society
1900 Kanawha Boulevard East
Charleston, WV 25305

Mr. Gary Sharp
District 5 Game Biologist
WV Division of Natural Resources
Route 1 Box 484
Point Pleaseant, WV 25550

Local Agencies
Mr. Craig Warner, Director of Sales
Cabell Huntington Connection & Visitors Bureau
763 Third Avenue
Huntington, WV 25701

Locations for Public Viewing
Jenkins Plantation Museum
Attn: Matt Boggess, Jenkins Site Manager
8814 Ohio River Road
Lesage, WV 25537

Cabell County Public Library
Attn: David Owens, Reference Department
455 9th Street Plaza
Huntington, WV 25701

Robert C. Byrd Locks & Dam Project Office
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Mr. Michael Mametter
2408 Central Avenue
Ashland, KY 41101

Ms. Mary Jo Martin
304 Main Street
Huntington, WV 25702

Ms. Easter Miller
1214 McClung Avenue
Apartment #6
Barboursville, WV 25504

Karen & Johnny Nance
3059 Wilson Road
Barboursville, WV 25504

Mr. Ken Shaw
Route 1 Box 557
Milton, WV 25541

Ms. Carol Simon
306 West 18th Street
Huntington, WV 25704

Mr. Tommy Thompson
2408 Central Ave
Ashland, KY 41101

Mr. Victor S. Jenkins Wilson
214 Norway Avenue
Huntington, WV 25705

Ms. Mary Stewart
215 Elizabeth Street
Sistersville, WV 26175

Ms. Jo Huff
1316 County Road 124
Chesapeake, OH 45619

Mr. Robert Wilson
1240 Kanawha Terrace
Huntington, WV 25701

Ms. Nancy Spurlock
Route 1 Box 29
Glenwood, WV 25520

Appendix F

Public Comments on Draft EA

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ORIGINAL

PUBLIC HEARING

JENKINS HOUSE

THE HUNTINGTON DISTRICT, ARMY CORPS OF ENGINEERS

DRAFT ENVIRONMENTAL ASSESSMENT & PRESERVATION PLAN

April 10, 2008

Greenbottom Community and Senior Center

Greenbottom, West Virginia

Reported by: Michele G. Hankins
Court Reporter
Notary Public

Michele G. Hankins
PMB 729 Ninth Avenue #129
Huntington, West Virginia 25701-2718
(304) 654-3745

The public meeting regarding the Draft Environmental Assessment & Preservation Plan (DEA/PP) conducted by the Huntington District, U.S. Army Corps of Engineers, before Michele G. Hankins, Court Reporter and Notary Public in and for the State of West Virginia, on the 10th day of April, 2008, at 6:00 p.m. The meeting was held at the Greenbottom Community and Senior Center, 7863 Ohio River Road, Lesage, West Virginia.

CONTENT

P R O C E E D I N G S

MR. WORLEY: First on our list, we have Karen LeGrand.

(Declined to speak.)

MR. WORLEY: Second, we have Melissa Conkey. (Conley.) Did I say that right?

(Declined to speak.)

MR. WORLEY: Next we have Victor, Victor Jenkins Wilson.

MR. WILSON: Good evening. It is wonderful to have this meeting here this evening in what is possibly the church, which existed here on Jenkins Plantation.

Captain William Jenkins in his will says, I am going to build a church here because I am worried about my children's spiritual welfare. This was in 1857. And he said, If I live long enough, and he lived another two years.

So possibly we are in that church.

Twenty years ago when the Jenkins family gathered in the living room at the end of the open house, We ended with the Lord's Prayer and we asked to place this house in God's hands.

I am so thrilled that he has nurtured us

and sustained us in our 20-year effort of the Greenbottom Society and still be present in this activity and I am so glad to see the point that we are at right now.

Concerns that I have are that if the addition comes off, that there be an auxillary building placed there until the outbuildings are restored, so that there is office space, bathroom space, space for the lawnmower.

Another concern is that we have had some discussion about removing the bathroom up on the second floor. It is not original. That area had been used as library space.

Also, a visitor to the house, said that Margaret Jenkins had told her that General Jenkins had his desk in the front window looking over to Ohio. He refers to a speech in Congress where he says, I look from my second-floor window to Ohio, where I see all men are free and I hope that day is coming for Virginia.

So it is important to remove that restroom, but we are going to have other facilities for it.

There is discussion about dormers, which

perhaps need to have further exploration.

I am very happy to have my brother, Bob Wilson, living here in Huntington now and he has been involved in bringing houses like this all the way from discussion, through opening them as house museums and he has a world of experience in what the overlay of federal regulations are for it.

I am very happy to say that we are at the point of actually moving forward this summer and getting some of this work done that is so necessary for this preservation.

MR. WORLEY: Thank you, Mr. Wilson.

Next we have Ned Jenkins. (Jones.)

I don't think I made myself clear. But if you could, come up to the mic and state your name, and spell it if it is unusual for us, please.

MR. JONES: We would not be here tonight if it were not for the untiring efforts of Congressman Nick Rahall. Not just year after year, but really for several decades. As well as the work of his staff, including the never-say-die attitude of Jim Zoia, we will forever be in their debt.

I am also mindful of the significant contributions that many of the early members of the

Greenbottom Society have made. They saw the travesty that was about to take place, they rallied the forces, not just to protect the Jenkins home, but to restore it.

We are a long way from 1986 and, sadly, too many of them are not with us anymore.

An equally important ally along the way has been the West Virginia Division of Culture and History.

Their vision for the potential of this project, coupled with their untiring perseverance has contributed greatly to where we are.

Tonight, we are a part, I think, of a defining event. Several times in the past we thought we had reached a point where we would see the commencement of preservation and restoration of the entire Jenkins House. Each time our hopes were dashed.

Tonight, I finally believe that part of what we had sought for so long, the preservation of the existing section of the Jenkins home, is about to actually start.

In addition, because of the magnificent efforts of Senator Byrd, Senator Rockefeller, and of

course, Congressman Rahall, to get WRDA 2007 passed, the restoration of the Jenkins home should follow forthwith.

I am also optimistic because I think now we have in place a Corps of Engineers, that is truly interested in doing this project and I want to thank them for what they have done and having this meeting tonight.

As for this document, there are a few concerns I would like to voice, but these are concerns that I want you to clearly understand are ones that -- I am really pleased with what you are doing, but these are issues that I would like you to look at just a little bit more.

On the Preservation Plan Formulation, you have limited preservation to seven areas. I would like to see if you could expand that to include issues such as flooring, because there are places inside the house where flooring is an issue. Trim, shutters, potable water, floor joists and removal of the upstairs bathroom.

I would also like to see you -- and I know or think we feel the same way about this -- but define a little more clearly what the term "house"

means. Because in the legislation that Congressman Rahall has passed, it is very clear that the house is just not the existing structure, but for this period and this time, the house includes the kitchen, the office, the privy, the brick walks, all of those structures that are within a 40- to 50-foot range of the existing building.

Also on the issue of fireplaces, I know you are going to be repointing the brick on the house and one of the safety issues that I am really concerned about is making sure that when you do all of this work with the masonry and you have all the experts there, that you make sure that you restore these fireplaces so that in the future they will be very safe for usage.

As for windows, the windows of the Jenkins home are an important feature, and we need to make sure that they are replaced with windows that are accurate for the house and not just for the period.

So hopefully there is something there that can assure us that what we are putting back is an accurate representation of the house.

One other issue and that is interpreting site features, which is in Appendix A, Article 7.2.

You discuss interpreting, but not restoring the detached features of the house. And you need to remove from this document the sentence which reads, Quote, The historic record of these structures is not complete, nor is it sufficient to guide reconstruction should they be proposed, Unquote.

Based on the passage of WRDA 2007, as well as clarifying comments from the Huntington District, you need to make it clear to the public in this document that you plan in the near future on restoring all of the detached features of the Jenkins home.

Thank you.

MR. WORLEY: Thank you, Ned.

Next we have Ms. Karen Nance.

MS. NANCE: I would like to say that I agree with everything Ned said.

I would also like to see in the back section of that when he was talking about 7.2, I think it is, with the recommendation that we did that we only have the interpretation of those outbuildings also being struck, because that is not preservation.

That is maybe something we can deal with

later because I don't believe that the research has been exhausted.

Whenever it was hired out or contracted out to be done, there were some places like New York City that I thought would have a good chance of some depository from the family-being that was not looked at.

There was a map, that I knew of its existence because I had once given them to the Corps, the B&O tracks that came through here that disappeared and I was told at the time that they were in Clifton Forge and they didn't try to go and find them and now they are in Baltimore, which might give some evidence because so far out from the tracks they would put the building footprints that were on those maps.

So there are some things that I think have not been looked at. I don't know if there has been an exhaustive research done on the Internet to see if there are some other people who might have gotten some of the Jenkins' photographs, or materials, or documents that could be helpful that could be out there.

Someone actually tried to search to see if

someone actually has that available.

So I don't think that the research is exhausted, so I feel like that we need to do some more research there to have more evidence if we don't have enough. I think we have enough to rebuild outbuildings, but if not, I think that can be done. So I also would like to see that out.

The other thing that I have is the problem with the water and the moisture in the front. I know that you all did a test this summer. I also know from living here that it was one of the worst droughts we have ever had. So I am a little bit concerned that maybe the test was not what was normally there as far as the water table goes.

I do know at that time that the pond that was in front of the house was greatly withdrawn from the house, though the wetlands, of course, are the first areas that are wet a certain percentage of the year. They don't have to be wet all the time like a pond. So they were, of course, still close to the house, but the water, the sitting water itself that had been there, was drawn back.

If indeed that it is five-foot below the foundation, that pond of water, maybe we should see

to it that it stays that far from the house. That might make us feel more secure about the condition of the house.

Those are the main comments. I just have one more I would like to mention: In the past I have mentioned this about the wells and we do need the water, like Ned said, and another thing I brought up several times is it seems like that throughout some of the documents that the Corps has put out over the years, they have left out the fact that General Jenkins was not just a Confederate General and Confederate Congressman, he was a U.S. Congressman before the war, from 1856 to 1860 and I think that is the period that we are going for that we need to make sure that where that is left out, we put that back in that document so that everybody will be aware of the fact that he wasn't just a Confederate Congressman, he was actually elected and was a member of the U.S. Congress from 1856 to 1860.

MR. WORLEY: Thank you.

Next we have Mr. Johnny Nance.

MR. NANCE: I am Johnny Nance. I am a professional restoration/preservation contractor, I have been for 25 years.

I am not a very good public speaker, but this happens to be a subject that is near and dear to my heart.

I would like to address the restoration of your all's plan that you are saying will be preceding this plan.

Hopefully, you all will be getting on that as quick as possible and we would like to also review to the public those plans also and on the research end, as my wife said -- which she is an expert at -- if it takes only -- I mean, if you need more than documentation and photographs and that type of research to restore something, then we might as well go and bulldoze Colonial Williamsburg because there were four or five original structures down there. The entire rest of that village is a reconstruction from archaeology and a research of period-type buildings.

This is a federal style. In the federal style, your window placements, your door placements, were all specifically designed to match that style of structure. So therefore, simply the house gives you a place to start whenever you redo the kitchen and the library because they will reflect exactly

the style of the house.

Like I said, I am not a public speaker.

Thank you.

MR. WORLEY: Thank you, Johnny.

That completes the list of folks that signed up and I would like to go back to the top again to Karen LeGrand. Would you like to make any statements?

(Declined.)

MR. WORLEY: Melissa Conley?

(Declined.)

MR. WORLEY: Is there anyone else that would like to come up and make a statement?

MR. MILLER: I don't want to make a statement, I just want to --

MR. WORLEY: Please come up because we don't want to miss anything for the record.

If you would, state your name and then your comment.

MR. MILLER: My name is Greg Miller.

I used to run the Jenkins Plantation up until about six years ago and what I was wondering was if you all took into consideration not only the water problems and the termite problems, but the

floors and the bathroom that they have there that wasn't there then and that used to be a library for the General and his brothers. I would just like to see that put back in.

As far as I can remember also, the walls inside the Jenkins house, I have painted those walls probably a dozen times trying to keep the moisture out.

You need to put some type of water-barrier type of protection on the walls so that the moisture can't make it through the brick and into the house.

That's all.

MR. WORLEY: Thank you, sir.

Any other comments? Is there anyone else that would like to come up and present a comment for the record?

Sure, Johnny. Come back up.

MR. NANCE: I am Johnny Nance.

The one issue I would like to cover under the preservation plan is the basement fireplace openings.

They have been shrunk for modern use and one was a winter kitchen and I would like to see that winter kitchen put back in place that would be

part of the preservation of the main structure itself.

Thank you.

MR. WORLEY: Anyone else?

Victor?

MR. WILSON: Through all of Karen's hard work and research over in Richmond, looking at the personal property tax rolls, et cetera, she has gleaned a lot of information about the estate.

They list in those tax rolls, the number of horses, the number of cows, the number of hogs.

The fact that in, I believe, in the 1850's census, Captain William Jenkins, who was the builder of the home, had a coach and four on his tax rolls and just as we get assessed personal property tax on our vehicles today, he was assessed that on his vehicle back then.

But we can work backwards from these tax rolls and see when you have this volume of number of animals, number of people living on the estate, carriages, number of horses owned, it is really easy to work back from that in terms of when you get to the restoration stage.

You know the fact that all of these

outbuildings were absolutely necessary in order to conduct the business of the estate, to serve as a hospitable home for visitors, which we know the President of the United States came to dinner because my brother has a plate that was on the table, that our grandmother said was used there.

Cyrus McCormick, came to the house, saw in his reapers, was a cousin of the family. So these out structures, there is every justification for their restoration.

I am very pleased to see that the preservation work is going to dovetail into the restoration work.

I hope eventually we can get underneath this building and look at its foundations and its wooden structure to see if potentially this is the church that Captain William Jenkins built on his estate.

I also want to check the estate records for his son, William Alexander Jenkins, whose home is still standing across the street on Lunsford Lane. Perhaps when his estate was settled in the 1890's, it makes some reference to this being the church on the property.

But we certainly appreciate all of the hard work of Jim and Clara Knight over the years. Having the house opened to visitors from Germany, school busses coming by and all of the people who have just stuck with the Greenbottom Society for all of these years and this is a very happy day to actually see the progress beginning to happen.

Thank you.

MR. WORLEY: Thank you, Victor.

If you would, please state your name, please.

MS. SORRELL: Kelly Sorrell.

I just want to say that back in October, I had a period wedding at the Jenkins Plantation.

I would like to see on my ten-year anniversary, the house restored and preserved and everything put back together so in ten years from now, or longer, for it to last for everybody.

MR. WORLEY: Thank you.

Karen?

MS. NANCE: Just one of the things that I didn't mention when I was up there and because it is really not going to be part of the plan probably until you do restoration is the African-American

heritage.

Because the African-Americans, really didn't live in the house. So when we talk about the preservation work you are doing, it is going to be difficult to tell much of their story until their restoration work is done and then we will be able to tell the story better for the African-American population that lived at the house.

Just one question that just bothered me. There is no fan light. I am sure that is not what you planned, the dormers off, but the fan lights off was probably a mistake, right?

UNIDENTIFIED SPEAKER: On the record, yes. This is an artist's rendering of what it would look like when we removed the dormers and the paint additionally is to be removed. I didn't catch the fan light.

MR. WORLEY: Well, if you are looking, this view is from the rear of the house and that doorway doesn't have a fan on it.

MS. NANCE: Yeah, I was thinking that this was the rearview rendering or the front that didn't have it because we had talked about the dormers being gone.

Thank you.

MR. WORLEY: Thank you, Karen.

Ms. Knight.

MS. KNIGHT: I am Clara Knight.

I would like very much to see the front of the house and water off the driveway so we could see the front.

You don't take guests into the back of a southern Virginia plantation.

Thank you.

MR. WORLEY: Thank you, Ms. Knight.

We had another hand, I think.

Any other comments?

MR. WILSON: When you do your masonry work, if the addition is, in fact, going to come off the house and we hope that it won't come off until you have an auxillary building for office space for the on-site manager, Matt Boggess, a place for the lawnmower to go, restroom because you are not going to have the restroom upstairs any longer.

When you do that and when you restore the masonry, you are going to have to brick in the door that currently leads from the dining room into the addition because that doorway was put in by Jim and

Clara Knight.

The original brick were stored in the garage until, as I understand it, some guy came along who needed some brick to fill his driveway in and the original bricks from the home were taken to his driveway.

Anyhow, if we could find out where that driveway is and get the original brick back.

MS. KNIGHT: When The Division of Natural Resources lived there and they needed the room in the garage, so they had some man up the road -- I know where he lives -- take the bricks up and put them in the road to the river. They are in the Spurlock Creek Road to the river, sometime after we left there.

MR. SHAW: Actually, I think you are wrong, Ms. Knight.

MR. WORLEY: Kem, would you stand up?

MR. SHAW: Certainly.

MR. WORLEY: State your name, please.

MR. SHAW: Kem Shaw. I am in the area management group of Greenbottom.

I believe that Ms. Knight is wrong because when the bricks were taken out, we moved those over

to the old tobacco barn. The tobacco barn was old and falling down and while we were cleaning it up, someone stole the bricks out of there.

We did not give these away, or sell them, or anything. They were stolen, actually.

MS. KNIGHT: They weren't given away. This man told me that he was told to take them over and put them in the road to the river at the Spurlock Road because it was impassable.

MR. WILSON: Well, in any case, bricks are going to have to go back in that doorway and if we can ascertain where they have gone, that would be wonderful.

There was one doorway, which is the one closest here and that was used to bring meals from the outdoor kitchen into the dining room and in the winter, access would be up through this door out and into the dining room, so that doorway needs to stay.

Also, another architectural feature that probably needs to be removed is the area beneath the staircase. That staircase to the basement was presumably not there because the wall cuts into those windows there, so that staircase, below the main staircase, probably needs to be taken out.

In the archeology digs that were done by the Corps, they recovered and found out that there were actual stairs where this window is here in the basement, there are stone stairs going down and there was a doorway there, so if you are really doing an accurate preservation of the house, you would want to reopen this, reopen the window on the other side which had stairs.

There is another symmetrical window on this end, which presumably if you dug down, you would find stairs, because the house lived with its dependencies, you have to be able to access -- and as Karen mentioned with the question of raising the house was brought up, the first floor was a living floor in the house.

We have a letter, a family letter, where Captain Jenkins' daughter is asking her father, or states that her father has said that the people -- and I don't know who the people are, whether they were African-Americans who were being schooled on the site -- but the people could have his globe that was in the living room to use down below it in the school room.

So this was a room that was very much an

important part of the house and these stairways out connected it to the adjacent outbuilding.

So those stairways really need to be restored if we are going to do a full restoration.

Also on the front of the house, as you have seen by the photographs at the beginning of the program tonight, we have photographs of the original construction of the front porch, which had benches that were across from each other.

Johnny noticed years ago that the wood railings coming down that porch turned in the same manner that the railing in the main hallway in the house, it turns at the end, so they were repeating the same architectural technique in both railings.

So the front porch needs to be brought back the way it was in those photographs.

Also in the garage and for many, many years, was a cardboard box with the hinges that went to the shutters that were on the front of the house. You saw those shutters in one of the first photographs.

The spacing for those hinges is still in the window sashing, you can see where those hinges were. So if those could be retrieved and put back

on the house, that would be part of the restoration.

I have spoken to a woodworking school here in Huntington, where they would be very anxious to come out as a project for the students -- these are kids that have dropped out of high school -- to manufacture a set of shutters for the house.

We know the exact dimensions because we have the photographs. Just as we know how to reconstruct the outbuildings because you can measure from this building and use and measure to see exactly the size of the outbuildings.

Anyhow, there are quite a few features that need to be considered.

Thank you.

MR. WORLEY: Thank you, Victor.

Do we have any other comments?

We also have another dignitary, Ms. Carol Miller, with the West Virginia House of Delegates. Sorry I missed you before.

If there are no other comments, that will conclude the official comment period of taking oral comments.

If you have your card and you have comments written on them, please make sure we get

them. If you want to take them home with you and fill them out, that's fine.

If you have a letter that you would like to send to us with your comments, the address and where to mail them to is in your packet, so please provide that to us.

We have our points of contact, our main points of contact -- and I think this is in your information packet as well -- Lisa Morgan, our project manager and Amanda Dethman, our lead planner on this project, if you have anything that you want to talk specific details about, please contact them.

Of course, everybody on the team is eligible to be contacted, as well, but those are the two lead folks for us on this project, so please contact them.

We have some key members that are going to stay around and talk to you as long as you want to talk.

Lisa, is going to be here, Amanda and John Preston, Todd Mitchell, our architect and Brentley Jackson, our archeologist, are all going to stay here and stay here as long as you want and answer questions after the meeting.

But if you have an official comment or something that you want to make sure is addressed in the report, please document it for us so that we can make sure that we don't miss that.

All of those will be responded to and we want to make sure that we capture everything we can.

Thank you for everybody coming tonight. I hope you had a good evening.

Thank you.

(Public meeting concluded.)

To Wit: State of West Virginia

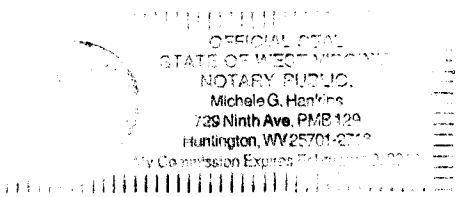
I, Michele G. Hankins, a Notary Public and Court Reporter within and for the State aforesaid, do hereby certify that the public meeting was taken by me and before me at the time and place specified in the caption hereof.

I do further certify that said testimony was correctly taken by me in stenotype notes, that the same was accurately transcribed out in full and reduced to typewriting, and that said transcript is a true record of the testimony.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which these proceedings were had, and further I am not a relative or employee of any attorney or counsel employed by the parties hereto or financially interested in the action.

My commission expires the 13th day of February 2013.

Given under my hand and seal this 25th day of April 2008.



Michele G. Hankins
Court Reporter
Notary Public

Dethman, Amanda J LRH

From: Chris Knorr [Chris.Knorr@wvculture.org]
Sent: Thursday, April 24, 2008 3:26 PM
To: Dethman, Amanda J LRH
Cc: Adam Hodges; Susan Pierce
Subject: Jenkins comments

Amanda,
I just had a couple issues with the Draft Environmental Assessment, Jenkins House Preservation Actions.

Pg 6-7 of Pres Plan, 4.2, dealing with the roofing, particularly the last sentence. Although I do believe that alternatives to wood shingles can be considered, I think that the possiblity of using wood shingles should not be ruled out at this point. There are installation methods, such as the use of "Cedar Breather" (http://www.benjaminobdyke.com/html/products/cedar.html) , which can lengthen the life span of wood shingle/shakes, when installed over solid sheathing, thus improving cost effectiveness.

Pg 10 of the Pres Plan, 4.4 Windows
Given that the windows may be easily viewed from ground level, and that all sides could be considered primary facades, I do not believe that there would be an acceptable alternative to wood for the proposed window replacements. Also, given the fact that the structure is indeed a house museum, it is a project which should more closely follow the Secretary of the Interior Standards for Preservation, or Restoration, rather than the more flexible Standards for Rehabilitation.

Should you or Lauren want to discuss this any futher, please feel free to contact me.

Chris Knorr
West Virginia State Historic Preservation Office Division of Culture and History 1900 Kanawha Blvd. East Charleston, West Virginia 25305-0300
phone: (304)558-0240 ext.156
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Robert W. Wilson
1240 Kanawha Terrace
Huntington, West Virginia 25701-3538

Victor S. Wilson
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Huntington, West Virginia 25705-1306

Re: Comments on the Draft Environmental Assessment, Jenkins House Preservation Actions

Thursday, April 24, 2008 sent by email

Draft Colonel's Finding ¶ 2

Does not refer to WRDA 2007

Draft EA

p 5 para 2

What impact did the 2007 drought have on the climatological study? Explain why the consultants never visited the site.

p 6 para3

The use of the phrase "intensive research" is misleading since there were many sources available that were not used. These can be identified by members of the Greenbottom Society if the COE so requests.

P 8 para 2

Add: Gen'l Jenkins was a "national political and military figure"….

para 3

The statement "modern management of the wetlands" is misleading. The area was compromised, through flooding, by the COE in tandem with DNR; this should be acknowledged and stated in the EA. The acreage was farmed from 1825 until the COE's taking. As a Historic

Register site, the flooding was never subjected to formal Historic Preservation Act review. In fact, the COE received a letter from the Federal historic review agency stating this. I have provided a copy of the letter to the COE which must included in this EA.

P 9

The COE has failed to list, and therefore address, with these Preservation matters in the narrative. Testimony at the Greenbottom meeting addressed some of these in more detail:

Flooring

Trim

Hardware

Shutters

Removal of the 2nd floor bathroom, reconstruction of the office

Outside staircases (4, one in use) to the 1st floor (basement)

Closing modern doorway to the addition *original brick used in the closure of the of the 3 staircases could be used to fill in doorway when the addition is removed*

Protection of the foundation stones in the patio and in the lower section of the addition

Septic or pump-and-haul

Potable water

Fire protection (using techniques developed for historic structures)

The house and its dependencies must be considered as one. The residents of the house during the 1825-1860 period could not have lived without them. This means that the 25 foot perimeter must be expandedto incorporate them. It should be further noted that the structure for the house slaves abutting the house is not mentioned. It probably was above the kitchen.

Greenbottom was a self sufficient plantation. The lumber and brick, etc. were manufactured by slaves, on site.

Have the archeologist and COE historian been credentialed as experts in Virginia Federal archeology or architectural design? I ask this because the historian notes on p 2 of the Preservation Plan that "…Jenkins resided in an affluent region of Rockbridge County..". The house he lived in, "Buffalo Forge," does not represent the style of the Jenkins House. Historical material available to the COE notes that Jenkins lived in Tidewater Virginia where he owned a

fleet of coastal vessels. Clearly he was influenced by the Federalist style of post-Revolution Virginia. During discussions, the archeologist questioned whether the dependencies can be reconstruction based on the existing foundations. In fact, the foundations provide an excellent guide to future restoration.

Turkey Creek should be grubbed out to the River and drains installed to allow water flow into the creek from behind the house. This will help preservation and site access. The fact that it has not been done reflects poorly on the COE and DNR.

The flooded acreage in front of the house should be allowed to dry out by destroying the weir and continuously removing beaver dams. It is no longer an effective hunting preserve since only black powder weapons and bow and arrows are now permitted. By the time the restoration plan takes effect, this land should revert to historic tillable acreage in order to provide an accurate interpretation and be in compliance with the Historic Preservation Act.

The narrative on page 2 contains errors and omissions relevant to the preservation project. I suggest that the following rewrite be included:

"2. PROPERTY HISTORY

Captain William Alexander Jenkins purchased the 4441 acre Greenbottom tract in 1825. It was paart of the Jays Grant, up-river from the historic Savage Grant, and had been owned previously by Virginia Governors Nicholas and Cabell (for whom the County was named). The tract was half Ohio River bottom land and half forested hills to the east

Jenkins orientation to water transportation began when he owned vessels that carried goods and passengers between Richmond and Lynchburg on the James River. Governor Cabell had a home in Lynchburg, "Point of Honor," built in 1815 in the Federalist style.

Jenkins next owned a fleet of coastal ships (hence "Captain") out of Tidewater Virginia. These sailed from New York to the Caribbean. He sold them and moved to eastern Rockbridge County, Virginia, onto property and buildings: "Buffalo Forge", still standing He travelled several times to the Ohio looking for opportunities, typical of the western movement.

However, he found that commercial farming was impractical on the Ohio River because of the rigors of "pole boating" upstream against the swift current. He met Robert Fulton and travelled on his steamboat "Clermont" in 1807. This opened up new possibilities to him for commerce on the Ohio. By the time he purchased Greenbottom, farming economics based on steamboats was well established. The plantation's whole orientation was to the River. Slaves provided household service, crafts, brick making and farm labor.

The tract provided two agricultural opportunities: the bottom land could be tilled for crops to sell and to feed the family and slaves; hogs could free-range in the hills, eating acorns and other nuts. Jenkins shipped hogs and crops to Cincinnati, Ohio and other points down-river. It was a major economic enterprise, as tax records show, the most productive in western Virginia.

The family and slaves moved from Buffalo Forge and built temporary housing. Construction began on the house and ancillary structures. These were built by slaves from lumber cut from trees on site and bricks made in its own brickyard. The house was completed in 1835.

The house, immediate dependencies, barns, warehouses, slave quarters, landings and tillable acreage, in concert, illustrate the comprehensive historic architectural and economic nature of the property.

Delete the first sentence of the 2nd para.

4th para. Jenkins served in the US Congress.

There is little mention of slaves throughout the document – 80 were noted in the 1860 Census

P 10 Original windows should be preserved; new windows should replicate originals; and, new glass should replicate original.

P 13 para 1. The sentence beginning "To fully plan…" should introduce a separate paragraph. The development of a landscaping plan should one of the preservation contracts. It should include the area in front of the house to the River including rehabilitation of the road to the passenger landing.

5.3

The first sentence is misleading and incorrect and demonstrates a paucity of research, or lack of knowledge about this historical period

P 14 fig 11. This mantel comes from the demolished historic Shelton House on Rte 60.

7.2

This paragraph needs to be rewritten or rewritten since it also appears to reflect incomplete information.

Time is of the essence and these comments reflect on restoration per se rather than preservation of the house and the foundations of the ancillary buildings. The restoration scoping the COE should contract with the University of Virginia, School of Architecture, Department of Architectural History which is pre-eminent in this particular field.

A U Va architect should oversee the removal of the addition, the closure of the doorway and the protection of the stones. This architect should also oversee the removal of the dormers. The stairway to the basement should be tested by a dendrochronologist to determine whether it is original to the house.

Johnny & Karen Nance
3059 Wilson Rd.
Barboursville, WV 25504
304-736-1655

April 23, 2008

Amanda J. Dethman, PM-PD-R
U.S. Army Corps of Engineers, Huntington District
502 Eighth Street
Huntington, WV 25701-2070

RE: Draft Environmental Assessment Jenkins House Preservation Actions

Dear Ms. Dethman:

To quote an old adage, "when we forget our past, we are destined to repeat it." Therefore, as individuals who have been involved in this project for 20 years, we feel those 20 years of experience need to be considered. For you, Ms. Dethman, this is new ground, for us it is not. We have been here numerous times over the past 20 years with the Corps and we see little change. This is not the first study and/or plan we have reviewed. A common thread is that past comments and concerns are not addressed in the new study/plan. Every time we are told this is a new beginning. Thus, we must begin again providing the same comments and concerns. Needless to say, we are a little frustrated, but for your information, the following comments are being provided.

- The Deadline of Sept. 2009: For 19 plus years, under the Historic Preservation Act, the Corps has had a legal obligation to preserve the Historic Jenkins House Site that it purchased. The Corps did not have to purchase the house and surrounding land. The Corps could have mitigated elsewhere such as on site at the Lock and Dam Project as is common or at the DNR McClintock Duck Hunting Facility. If the Corps had done an EIS on the Green Bottom Property, as it did on the Lock and Dam Property, it would have discovered before purchase that the Green Bottom Property had extensive Cultural Resources such as the Historic Jenkins Plantation Site and numerous Native American and African-American Sites including the Historic Clover Site. Thus, the Green Bottom Property should have been excluded as a possible site to use for mitigation of loss wetland at the Lock and Dam Property. The logical place to have mitigated the wetlands would have been back on site at the Lock and Dam Property because the Native American and historic cultural resources were already being destroyed due to construction. The Green Bottom Property selection necessitated the disturbance of Native American and historic sites. The Corps was well aware that it had purchased a National Register Site that was located in a flood plane and it was required by law to preserve the site. Thus, the Corps should not have waited nearly 20 years to admit it was responsible for preserving the Historic House/Site in place. Now that we are running out of time to get the work done, how does the Corps plan to mitigate the loss of time? We have been told that the date can be extended, but I saw nothing definitive in the plan that assures us of this fact.

- The wetlands in front of the Historic House: The plan does acknowledge that the wetland in front of the house has had a negative impact on the house's situs as well as the railroad and state road. However, the House was not on the National Register when the railroad and state road were

constructed; it was on the Register when the wetlands were constructed by the Corps. Therefore, I would have expected something in the plan to correct this negative impact such as a plan to mitigate the wetlands in front of the house elsewhere. Instead we got a water study done during one of the driest summers on record when the Corps/DNR had drained the pond in front of the house that concluded the pond/wetlands in front of the house had not raised the local water table and was not damaging the house. Since the pond of water would have been the source of the higher water table around the house and had ample time to dry up, the tests do not reflect the normal soil conditions around the house. I simply do not believe the results of the study and I believe that the timing of the study is suspect and was deliberately taken at a time when the pond of water was no where near the house and the surrounding ground was unusually dry. Therefore, I would suggest that the location of the pond during the tests be determined and the pond never allowed getting any closer to the house unless the Ohio River is in flood. Furthermore, as in the past, the concern over the contaminated well was not address in the plan even though it has been brought up numerous times by the public. Could it be because the Corps could dry up the yard for its study, but not decontaminate the well for its study?

- Reconstruction of Outbuildings and Visitor's Center: In addition, the US Congress mandated that the Corps reconstruct out buildings. The Corps told the public that this plan could only cover preservation and it was waiting for guidance to plan restoration and reconstruction. However, the plan did cover restoration/ reconstruction. The slides that were presented at the public meeting did not cover restoration/ reconstruction, but under section 7.2, the Corps says there is not enough evidence for reconstruction and the research has been exhausted. I do not believe the research is exhausted because the Corps' research merely went back over prior research done by others. When asked why the Corps' researcher did not go to New York City, etc. to look where others had not had the opportunity to look, the public was told it wasn't in the budget. Furthermore, I do not agree that the research that has been done is not adequate compared to other sites that I have visited. I feel the Corps is deliberately holding the standards too high by insisting photographs, plans, etc. must be available. However, funds have been spent on an interpretive film of the archaeology done to date that serves no immediate need especially since the Corps is trying to get out of reconstruction. The funds would have been better spent on preserving the brick, etc. As far as we are concerned, interpretive signage at holes in the ground is not sufficient interpretation for such a significant national site. Our story cries out for more than a hit and a miss interpretation.

- The African-American Story: Another common thread found in Corps documents throughout the years: the African-American Story is virtually ignored. It could be because without the reconstruction of outbuildings and a visitor's center the telling of the African-Americans' story on the Plantation will be greatly diminished. Thus, since the Corps is already planning to not reconstruct, the Corps sees no need in planning to tell their story.

- US Congressman Albert G. Jenkins: Another common thread of Corps documents, once again the historical significance of Albert G. Jenkins is down played in the plan. The plan leaves out the fact that Albert G. Jenkins, prior to the Civil War, was a **US Congressman**, 1856-60. He was not just a Confederate Congressman and Confederate General. He was not just locally significant, but national significant.

- Window Sashes: The plan seems to indicate that no Historic Sashes were removed only non-historic; however, I was told at the time that historic sashes were removed because there was no money in the budget to restore the historic sashes. I would like evidence that no Historic Sashes

were removed. Also, the plan indicates that some of the sashes installed in the house in the 1990s should be kept. I disagree. They are not the proper dimensions and fit loosely in the window frames besides the fact that they are cheap, finger jointed sashes that have no longevity.

- Roof Materials: According to Clara Knight, the house had wooden shingles on it when they purchased the house in the 1960s. Thus, when the roof is replaced it should look as if it has wooden shingles even if the material is not wood.

- Electric & Mechanical Systems: The plan does not give enough detail on how new electric and mechanical systems will be installed and it does not say if the existing electric conduit on the walls will be removed.

- Wood features: The research on the wood features of the house was poorly done. For example, the plan dates a 1830s mantel as 1930 and does not recognize it as being added in the 1990s. I would have thought the Corps had photographs of the Historic House when it began work and the mantel would not have been in them. Records of the 1990s work done on the house by the DNR do not seem to exist either. Also, the preservation of the floors is not listed as a need.

I am sure this is not what you wanted to hear, but if the Corps had listened to comments and concerns in the past, a lot of this could have been avoided. For example, the Corps would have chosen a time to do water/moisture tests during normal conditions instead of draining the front yard and waiting for the lawn to dry up, taking the tests, and hoping we didn't notice. It takes me back to the time the DNR/Corps turned the house over to Culture & History when it was in deplorable condition, and later tried to argue it was in good shape. Of course, no one thought we had the good sense to document the condition, but we did. No one seemed to think those of us who attended the first public meetings would remember there was no planned wetlands in the front yard much less keep a copy of the plan, but we did. It would just be wonderful, if for once, we were treated with respect and given credit for our knowledge and experience instead of treated like dump folks who you can pull the wool over their eyes.

Please do not take anything I said personally because my comments are addressed to an entity, the Corps. I feel I have earned the right to be honest. If you have any questions, you can call us at the above telephone number.

Sincerely,

Karen N. Nance

Johnny G Nance

Cc: WV SHPO
Congressman Rahall

US Army Corps of Engineers
Huntington District

R.C. BYRD LOCK & DAM
JENKINS HOUSE
PRESERVATION PLAN / ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING

COMMENT RECORD
(Privacy Act Statement on Reverse)

NAME AND ADDRESS
Karen LeGrand
1032 Valley View Dr.
Lesage, WV 25537

PHONE
304-736-5394

INFORMATION ON THIS FORM WILL BE USED TO NOTIFY YOU OF FUTURE ACTIONS AND TO RECORD BRIEF WRITTEN COMMENTS.

WHOM ARE YOU REPRESENTING?

☒ SELF ☐ ORGANIZATION

☐ GOVERNMENT AGENCY ☐ OTHER

NAME OF ORGANIZATION OR AGENCY AND YOUR POSITION OR TITLE

Preservation actions have been identified and considered by the Corps of Engineers to achieve project purposes. This consideration includes the evaluation of environmental, economic and engineering parameters of the project. The Corps would like your input regarding the proposed preservation actions. Please provide your comments on the proposed alternative(s), the areas of study, or the evaluation of preservation alternatives.

During Current Preservation or Proposed Preservation would like to see that the avenues for Public visitation not be removed during preservation. Perhaps a temporary interpretative Center be placed to continue Public visitation. Even though accurate preservation needs to be performed please don't lose sight of the need to keep the plantation and museum open and accessible to the public at all times for tourism opportunities for Cabell County & State of West Virginia.

Additional space is available on back of this sheet. Attach additional sheets as required.

US Army Corps of Engineers
Huntington District

R.C. BYRD LOCK & DAM
JENKINS HOUSE
PRESERVATION PLAN / ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING

COMMENT RECORD
(Privacy Act Statement on Reverse)

NAME AND ADDRESS

HOMER HOWARD
1123 SUNSET TERRACE
MILTON, WV

PHONE
(304) 743-4041

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WHOM ARE YOU REPRESENTING?

☒ SELF ☐ ORGANIZATION
☐ GOVERNMENT AGENCY ☐ OTHER

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I think at the meeting you covered most of the repairs that needs to be done on the Jenkins House. This house could be a good tourist attraction for this area and the state of West Virginia. Area schools could also ~~you~~ use this house as a history lessons for students. I lived in this area all my life and only found out about the Jenkins House and family about 9-10 years ago!

Additional space is available on back of this sheet. Attach additional sheets as required.

US Army Corps of Engineers
Huntington District

R.C. BYRD LOCK & DAM
JENKINS HOUSE
PRESERVATION PLAN / ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING

COMMENT RECORD
(Privacy Act Statement on Reverse)

NAME AND ADDRESS

Marilyn Coleman
1123 Sunset Terrace
Milton WV 25541

PHONE

304 743 4041

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WHOM ARE YOU REPRESENTING?

☒ SELF ☐ ORGANIZATION
☐ GOVERNMENT AGENCY ☐ OTHER

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Preservation actions have been identified and considered by the Corps of Engineers to achieve project purposes. This consideration includes the evaluation of environmental, economic and engineering parameters of the project. The Corps would like your input regarding the proposed preservation actions. Please provide your comments on the proposed alternative(s), the areas of study, or the evaluation of preservation alternatives.

I was delighted to hear at the meeting, the house was finally going to be restored.
It will be an important asset for this area and State.
I can forsee more historical events being held there.
We need to preserve history

Additional space is available on back of this sheet. Attach additional sheets as required.

US Army Corps of Engineers
Huntington District

R.C. BYRD LOCK & DAM
JENKINS HOUSE
PRESERVATION PLAN / ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING

COMMENT RECORD
(Privacy Act Statement on Reverse)

NAME AND ADDRESS

Natalie Adkins
2685 ~~Main~~ Toms Creek Rd.
Barboursville, WV
natsadkins@aol.com

PHONE

(304) 736-8337

INFORMATION ON THIS FORM WILL BE USED TO NOTIFY YOU OF FUTURE ACTIONS AND TO RECORD BRIEF WRITTEN COMMENTS.

WHOM ARE YOU REPRESENTING?

☐ SELF ☐ ORGANIZATION

☐ GOVERNMENT AGENCY ☐ OTHER

NAME OF ORGANIZATION OR AGENCY AND YOUR POSITION OR TITLE

Preservation actions have been identified and considered by the Corps of Engineers to achieve project purposes. This consideration includes the evaluation of environmental, economic and engineering parameters of the project. The Corps would like your input regarding the proposed preservation actions. Please provide your comments on the proposed alternative(s), the areas of study, or the evaluation of preservation alternatives.

Public comment (e-mail) wasn't included in comment section of DEA. Why was it not included?

Additional space is available on back of this sheet. Attach additional sheets as required.

Dethman, Amanda J LRH

From: Dethman, Amanda J LRH
Sent: Saturday, April 12, 2008 4:48 PM
To: 'natsadkins@aol.com'
Subject: Jenkins House Scoping Comments

Attachments: Jenkins House

Jenkins House

Natalie,

Thank you for joining us on Thursday, April 10 for the Jenkins House Preservation public meeting. In response to your concern that your scoping comment (e-mail) had not been included in the Draft Environmental Assessment (DEA), I reviewed my e-mails and the public comment section (Appendix C) of the DEA.

Attached is the e-mail that you submitted last May. In the e-mail you also included an attachment with comments from Melissa Conley. It appears that I only included the attachment to your e-mail. The comments in your e-mail are identical to the comments in the attachment signed by Melissa Conley. There may have been confusion or oversight on my part since the comments in both your e-mail and attachment were identical. When we finalize the DEA, I can include the body of text in your e-mail along with the attachment. Fortunately, since the comments in your e-mail and the attachment were identical, they were captured and considered.

Thanks for your attention to detail and interest in the project.\

Sincerely,

Amanda Dethman
U.S. Army Corps of Engineers
Planning Branch, Environmental Analysis Section
502 Eighth Street
Huntington, WV 25701
(304) 399-5819

Dethman, Amanda J LRH

From: NATSADKINS@aol.com
Sent: Wednesday, May 23, 2007 9:32 PM
To: Dethman, Amanda J LRH
Subject: Jenkins House

Attachments: Jenkins

Jenkins

Daniel & Natalie Adkins
2685 Tom's Creek Road
Barboursville, WV 25504
Phone: (304) 736-8337 Email Natsadkins@aol.com

23 May, 2007

Amanda J. Dethman, PD-R
c/o US Army Corps. of Engineers
502 8th Street
Huntington, WV 25701

Dear Ms. Dethman,

This letter in concerning the proposed renovations & restorations to the Jenkins Plantation, also known as Greenbottom. I am so pleased that the floor has been opened for suggestions. As I'm sure you know, Greenbottom has such a strong local history that has been touched by Native American, African-American & Caucasian influences. It ties into a diverse cross-section of the community. As more folks become aware of this historic gem and its backyard locality to the Tri-State area, attendance at functions and public support are on a steady incline.

In order to maintain the historical integrity of Greenbottom, I would like to address the following potential problems and make suggestions for their resolution:

FLOODING / WATER DAMAGE:

Originally, flooding would not have been a serious threat as the house was seated back from the Ohio River and a long drive went from the riverbank through the fields to the front of the house. However, since the development of the wetlands, the very mortar that holds the house together is deteriorating and the stone foundation has began to erode from the increased dampness alone. There is also now a very real threat of flooding as the wetlands have steadily encroached upon the house itself.

As the wetlands were not intended to be so close to the house, ideally, the wetlands should be drained away from the front of the Jenkins Plantation House. This would allow for the driveway to the river dock to be restored and would alleviate the threat of flooding and water damage. It seems a more cost effective solution than some of the more extreme measures that have been discussed, such as relocating the house from its historical seat or raising the house and filling in the first floor. Either of those options would be an absolute travesty to impose on this icon of local history.

If draining the wetlands is absolutely not an option, the only logical solution would be to raise the house and install the vinyl protectant and louvres. This would allow the first floor to still be utilized and could be camouflaged with period correct

landscaping which would serve a dual purpose as water absorption and beautification.

RESTORATION & PLANS FOR EXPANSION:

Keeping historical integrity in mind, the newest section of the house that serves as caretaker's office and kitchen should be removed. A new structure could be built and made to look period correct that could serve as an office and visitor's center. The bathroom should be reverted to its former status. If the outbuildings and period correct gardens were reproduced, it would be nice to have a self-guided tour. For example, visitors could stop at the office/visitor's center and view "The Ghosts Of Greenbottom" documentary. After getting a historical oversight, they could obtain a map that would allow them to explore the Greenbottom site at their leisure. At each outbuilding or designated visitor would encounter and small podium or informational plaque that explained its significance. There is a wonderful living history museum in Jeffersonville, Tazewell County, Virginia that is set up in such a way and it is very user friendly and appealing. Eventually, perhaps a small gift / souvenir shop could be located in the first floor of the house, or in the visitor's center. Any proceeds could be applied to the restoration and preservation effort. An excellent examples of this would be Belle Grove Plantation in Winchester, Virginia, Carnton Plantation in Franklin Tenn. and the Carter House in Franklin, Tenn.

The effort to preserve and eventually restore Jenkins to its former splendor is certainly a worthy endeavor. The community will reap the benefits and the Jenkins House will be preserved for future generations. Thank you for the opportunity to express my thoughts and notions. I look forward to seeing this project's fruition.

Sincerely,

Daniel & Natalie Adkins

---

talking about the glacial speed at which I had progressed. And I said, yes, but it was a tough journey. And it was a tough journey. He said, yes, but you're glad where you are now, and that's exactly right.

With the Corps now, and Congressman Rahall and what's going on, although, it's been a journey I don't want to go back through, I'm really glad we are where we are now. I think now we have an opportunity to really make something special out of what I see up there at that site just sort of being a shadow of itself.

I've always thought of this site being four magnets. One, is obviously the General Jenkins' home, the Civil War hero. Second, is the underground railroad and the pike experience. Third is the Clover Indians, and how you could have a presentation of everything that happened up there so long ago. And fourth is wildlife. Wildlife is a very important element that we need to capitalize on as well.

And if you put all four of those magnets together, I think West Virginia is going to have an attraction here that's going to bring a lot of

Appendix G

Agency Responses to Public Comments

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AGENCY RESPONSE TO TRANSCRIPT COMMENTS

PUBLIC HEARING

JENKINS HOUSE

THE HUNTINGTON DISTRICT, ARMY CORPS OF ENGINEERS

DRAFT ENVIRONMENTAL ASSESSMENT & PRESERVATION PLAN

April 10, 2008

Greenbottom Community and Senior Center

Greenbottom, West Virginia

Reported by: Michele G. Hankins
Court Reporter
Notary Public

Michele G. Hankins
PMB 729 Ninth Avenue #129
Huntington, West Virginia 25701-2718
(304) 654-3745

The public meeting regarding the Draft Environmental Assessment & Preservation Plan (DEA/PP) conducted by the Huntington District, U.S. Army Corps of Engineers, before Michele G. Hankins, Court Reporter and Notary Public in and for the State of West Virginia, on the 10th day of April, 2008, at 6:00 p.m. The meeting was held at the Greenbottom Community and Senior Center, 7863 Ohio River Road, Lesage, West Virginia.

CONTENT

P R O C E E D I N G S

MR. WORLEY: First on our list, we have Karen LeGrand.

(Declined to speak.)

MR. WORLEY: Second, we have Melissa Conkey. (Conley.) Did I say that right?

(Declined to speak.)

MR. WORLEY: Next we have Victor, Victor Jenkins Wilson.

MR. WILSON: Good evening. It is wonderful to have this meeting here this evening in what is possibly the church, which existed here on Jenkins Plantation.

Captain William Jenkins in his will says, I am going to build a church here because I am worried about my children's spiritual welfare. This was in 1857. And he said, If I live long enough, and he lived another two years.

So possibly we are in that church.

Twenty years ago when the Jenkins family gathered in the living room at the end of the open house, We ended with the Lord's Prayer and we asked to place this house in God's hands.

I am so thrilled that he has nurtured us

and sustained us in our 20-year effort of the Greenbottom Society and still be present in this activity and I am so glad to see the point that we are at right now.

1

Concerns that I have are that if the addition comes off, that there be an auxillary building placed there until the outbuildings are restored, so that there is office space, bathroom space, space for the lawnmower.

Response: A temporary building for office, bathroom and storage is being considered. Also being considered is an office and bathroom in the basement and a storage building for equipment. The existing non-functional bathroom in the basement could be made operational. A final decision will be developed in consultation with the West Virginia Division of Culture and History.

2

Another concern is that we have had some discussion about removing the bathroom up on the second floor. It is not original. That area had been used as library space.

Response: If a decision is made, in consultation with Culture and History, to remove the bathroom features, restoration of this space will be considered under the restoration phase of the project authorized by WRDA 2007.

Also, a visitor to the house, said that Margaret Jenkins had told her that General Jenkins had his desk in the front window looking over to Ohio. He refers to a speech in Congress where he says, I look from my second-floor window to Ohio, where I see all men are free and I hope that day is

coming for Virginia.

So it is important to remove that restroom, but we are going to have other facilities for it.

3

There is discussion about dormers, which perhaps need to have further exploration. 6

Response: The dormers have been determined to be not of the period of significance and will be removed in order to eliminate open passages for water and vermin intrusion in the attic, as discussed in the Preservation Plan.

I am very happy to have my brother, Bob Wilson, living here in Huntington now and he has been involved in bringing houses like this all the way from discussion, through opening them as house museums and he has a world of experience in what the overlay of federal regulations are for it.

I am very happy to say that we are at the point of actually moving forward this summer and getting some of this work done that is so necessary for this preservation.

MR. WORLEY: Thank you, Mr. Wilson.

Next we have Ned Jenkins. (Jones.)

I don't think I made myself clear. But if you could, come up to the mic and state your name, and spell it if it is unusual for us, please.

MR. JONES: We would not be here tonight if it were not for the untiring efforts of Congressman Nick Rahall. Not just year after year, but really for several decades. As well as the work

of his staff, including the never-say-die attitude of Jim Zoia, we will forever be in their debt.

I am also mindful of the significant contributions that many of the early members of the

Greenbottom Society have made. They saw the travesty that was about to take place, they rallied the forces, not just to protect the Jenkins home, but to restore it.

We are a long way from 1986 and, sadly, too many of them are not with us anymore.

An equally important ally along the way has been the West Virginia Division of Culture and History.

Their vision for the potential of this project, coupled with their untiring perseverance has contributed greatly to where we are.

Tonight, we are a part, I think, of a defining event. Several times in the past we thought we had reached a point where we would see the commencement of preservation and restoration of the entire Jenkins House. Each time our hopes were dashed.

Tonight, I finally believe that part of what we had sought for so long, the preservation of the existing section of the Jenkins home, is about to actually start.

In addition, because of the magnificent efforts of Senator Byrd, Senator Rockefeller, and of

course, Congressman Rahall, to get WRDA 2007 passed, the restoration of the Jenkins home should follow forthwith.

I am also optimistic because I think now we have in place a Corps of Engineers, that is truly interested in doing this project and I want to thank them for what they have done and having this meeting tonight.

As for this document, there are a few concerns I would like to voice, but these are concerns that I want you to clearly understand are ones that -- I am really pleased with what you are doing, but these are issues that I would like you to look at just a little bit more.

4

On the Preservation Plan Formulation, you have limited preservation to seven areas. I would like to see if you could expand that to include issues such as flooring, because there are places inside the house where flooring is an issue. Trim, shutters, potable water, floor joists and removal of the upstairs bathroom.

Response: The current plan is limited to preservation actions at the house. Most of the above comments pertain to restoration and will be considered in future planning actions for restoration authorized by WRDA 2007. The bathroom is being considered for removal subject to a decision to be reached in consultation with the West Virginia Division of Culture and History. Potable water is not considered a preservation issue.

5

I would also like to see you -- and I know or think we feel the same way about this -- but define a little more clearly what the term "house"

9

means. Because in the legislation that Congressman Rahall has passed, it is very clear that the house is just not the existing structure, but for this period and this time, the house includes the kitchen, the office, the privy, the brick walks, all of those structures that are within a 40- to 50-foot range of the existing building.

Response: WRDA 2007 provides that: "The Secretary [of the Army] shall ensure the preservation and restoration of the structure known as the 'Jenkins House' and the reconstruction of associated buildings and landscape features of such structure located within the Lesage/Greenbottom Swamp in accordance with the standards of the Department of the Interior for the treatment of historic properties." The plain language of the statute separates "the structure known as the 'Jenkins House'" from "associated buildings and landscape features." The current project is limited to preservation actions at the house; restoration efforts at the house and reconstruction of associated buildings and landscape features will be addressed in the restoration and reconstruction phases of the project authorized by WRDA 2007.

6

Also on the issue of fireplaces, I know you are going to be repointing the brick on the house and one of the safety issues that I am really concerned about is making sure that when you do all of this work with the masonry and you have all the experts there, that you make sure that you restore these fireplaces so that in the future they will be very safe for usage.

Response: Restoring the fireplaces to working condition raises issues of safety, authenticity, and climate control and will be considered in consultation with the West Virginia Division of Culture and History for action under the restoration phase of the project authorized by WRDA 2007.

7

As for windows, the windows of the Jenkins home are an important feature, and we need to make sure that they are replaced with windows that are accurate for the house and not just for the period.

So hopefully there is something there that can assure us that what we are putting back is an accurate representation of the house.

Response: The Corps agrees that the home's windows are one of its most visible and strongest character defining features. The replacement of windows will demand that new units conform exactly to the format, molding profiles, depths, proportions, textures, and overall appearance of Federal style sashes of the period of significance. If a wood alternative cannot achieve all of these qualities, wood units will be used. However, if units of an alternative material can produce the same historically appropriate appearance and meet the Secretary's Standards for Restoration, the Corps may consider non-wood windows in the interest of maximizing public funds for a long lasting preservation result.

23 One other issue and that is interpreting
24 site features, which is in Appendix A, Article 7.2.

10

8

1 You discuss interpreting, but not restoring the
2 detached features of the house. And you need to
3 remove from this document the sentence which reads,
4 Quote, The historic record of these structures is
5 not complete, nor is it sufficient to guide
6 reconstruction should they be proposed, Unquote.
7 Based on the passage of WRDA 2007, as well
8 as clarifying comments from the Huntington District,
9 you need to make it clear to the public in this
10 document that you plan in the near future on
11 restoring all of the detached features of the
12 Jenkins home.

Response: With respect to the quote, the Preservation Plan has been changed to clarify that **currently** the historic record is incomplete and insufficient to guide potential reconstruction; see change in text.

The District has made an intensive effort to locate any documents that would add to our knowledge of the Jenkins House and other structures at the plantation, seeking input from the public and the Greenbottom Society. The archival study failed to locate any previously unknown letters, writings, photographs, publications or other sources (O'Bannon 2005). In 2006, the District contracted for a Historic structure report on the Jenkins House to document the original fabric and changes that have occurred through time (Tuk, et al. 2006). This report utilized earlier reports commissioned by the District and by other interested parties.

The District contracted for geophysical surveys of the area immediately surrounding the Jenkins House (Kerr 2002) and to the east of the Jenkins House (Hargrave et al. 2006). The earlier noninvasive survey identified the location of nearby structures and features (Kerr 2002) and. archaeological excavations were undertaken to document them (Updike 2005). The kitchen structure and a privy were fully excavated and a probable slave quarters foundation and cellar adjacent to the kitchen was partially exposed. The excavations also documented portions of the office foundation, a brick walk and garden gateway. Information from the

excavations is useful but lacks detail needed to faithfully reconstruct the buildings. The later survey failed to identify any outlying structures or features dating to the period of significance (Hargrave et al. 2006).

The Draft Environmental Assessment and the Preservation Plan are different documents. The Draft Environmental Assessment covers the present project -- preservation actions at the Jenkins House. The Draft EA does not cover restoration actions at the Jenkins House or reconstruction efforts of outbuildings or landscape features, as it is outside the current preservation authority. The Preservation Plan focuses on preservation efforts at the Jenkins House but has a wider scope to include contemplation of restoration and reconstruction actions. The Corps' intention for preservation goals is that all actions will be compatible with future restoration goals.

Although preservation entails the protection and conservation of *existing* historic structures and material, any credible preservation plan should always consider long-range site planning that may have an impact on the ability of the subject building to maintain its National Register listing and overall integrity of setting and association. Anticipating future site development issues can also help focus preservation efforts and head off any actions that might end up compromising the subject building. Because the Corps is required to maximize and protect its investment of public funding, it must be mindful that future actions be compatible with current preservation work. Restoration and reconstruction await Corps Headquarters guidance on the implementation of WRDA 2007.

Also see responses to comments #10, #12 and #16.

9

13 Thank you.
14 MR. WORLEY: Thank you, Ned.
15 Next we have Ms. Karen Nance.
16 MS. NANCE: I would like to say that I
17 agree with everything Ned said.
18 I would also like to see in the back
19 section of that when he was talking about 7.2, I
20 think it is, with the recommendation that we did
21 that we only have the interpretation of those
22 outbuildings also being struck, because that is not
23 preservation.

Response: The current project is limited to preservation activities at the Jenkins House. the Preservation Plan has been changed to clarify that **currently** the historic record is incomplete and insufficient to guide potential reconstruction; see change in text. Reconstruction will be addressed in the reconstruction phase authorized by WRDA 2007.

10

24 That is maybe something we can deal with

11

1 later because I don't believe that the research has
2 been exhausted.
3 Whenever it was hired out or contracted
4 out to be done, there were some places like New York
5 City that I thought would have a good chance of some
6 depository from the family-being that was not looked
7 at.

Response: The Corps has sought (see, e.g., O'Bannon 2005; Hargrave, et al. 2006; Updike 2003) and continues to seek details on buildings and features at the Jenkins Plantation. The contracted archival research effort did examine New York records but found nothing that contributed to our knowledge of buildings and features at the Jenkins Plantation (O'Bannon 2006). The Corps is working to enhance old photographs in an attempt to discover construction details of the house, other buildings and features recorded in known photographs.

With exception of the Jenkins House that can be further examined, there is currently little information on the details of the buildings at the Jenkins Plantation. Under the Secretary of the Interior's Standards, detailed information is necessary to properly restore and reconstruct missing buildings and features. The Corps is bound to follow the Secretary of the Interior's Standards in these matters as directed by WRDA 2007. But, even without that directive the Corps could not undertake less than accurate construction without jeopardizing the National Register listed status of the Jenkins House.

Also see response to comments #8, #12 and #16.

11

There was a map, that I knew of its existence because I had once given them to the Corps, the B&O tracks that came through here that disappeared and I was told at the time that they were in Clifton Forge and they didn't try to go and find them and now they are in Baltimore, which might give some evidence because so far out from the tracks they would put the building footprints that were on those maps.

Response: Examination of railroad evaluation maps at the National Archives failed to reveal any new information on the Jenkins property as the maps depict buildings only within the railroad right-of-way (O'Bannon 2006:5).

12

So there are some things that I think have not been looked at. I don't know if there has been an exhaustive research done on the Internet to see if there are some other people who might have gotten some of the Jenkins' photographs, or materials, or documents that could be helpful that could be out there.

Someone actually tried to search to see if someone actually has that available.

So I don't think that the research is exhausted, so I feel like that we need to do some more research there to have more evidence if we don't have enough. I think we have enough to rebuild outbuildings, but if not, I think that can be done. So I also would like to see that out.

Response: The Corps contracted for archival research to gather and digest information on the domestic structure and dependencies at the Jenkins Plantation. Input was sought and received from members of the Jenkins family, the Greenbottom Society and others. The research relied, in part, on published historical works (see, e.g., Dickenson 1980, 1989; Hecker 1961; McGehee 2003, 2006; Nance 1998; Sawrey 1990) and on the results of archaeological surveys and excavations (Hughes and Kerr 1990; Hughes and Niquette 1989; Kerr and Clay 2002; Updike 2001, 2003). The archival research report documents intensive research, conducted at a number of locations, and substantiates the findings of earlier researchers that there are few known records, letters, photographs, family papers, or other materials that provide information on the Jenkins House and its dependencies (O'Bannon 2005). The Corps is interested in discovering and using additional information should any become available and welcomes the input of all interested parties.

The mandated purpose of the Preservation Plan is to identify existing threats to the material fabric of the building and to outline methods and actions to address them. The Preservation Plan does not deny the potential for further research to reveal information pertinent to the future treatment of the Jenkins House and its site, but cautions that reconstruction actions taken without adequate information may compromise the integrity of the site's history and its visual presentation to the public. (Also see response to comments #8, #10 and #16.)

13

The other thing that I have is the problem with the water and the moisture in the front. I know that you all did a test this summer. I also know from living here that it was one of the worst droughts we have ever had. So I am a little bit concerned that maybe the test was not what was normally there as far as the water table goes.

I do know at that time that the pond that was in front of the house was greatly withdrawn from the house, though the wetlands, of course, are the first areas that are wet a certain percentage of the year. They don't have to be wet all the time like a pond. So they were, of course, still close to the house, but the water, the sitting water itself that had been there, was drawn back.

If indeed that it is five-foot below the foundation, that pond of water, maybe we should see

13

to it that it stays that far from the house. That might make us feel more secure about the condition of the house.

Response: The Corps recognizes that the survey was conducted in a year with less than normal precipitation. However, the conclusions are based on the capacity of the soils for capillary action and elevation data. Groundwater elevations determined from acquired well and soil boring data during this evaluation indicate that the static groundwater level near the Jenkins House is similar to the elevation of the water surface in the wetland. Historical information indicates that subsurface hydrogeologic conditions (e.g. groundwater levels) near the house and adjacent wetlands are likely similar today as they have been in the past. Measured surface and groundwater table elevations, as well as the elevation of significant capillary moisture, were all well below (i.e. ~5.0 feet below) the elevation of the Jenkins House basement floor (549.85 ft). The elevation of the wetland is controlled by a beaver dam having top elevation of 544.93; this elevation was determined during the June 2007 site survey. The

top of the weir was found to be 543.25 during this recent site survey. Future weather or beaver-induced fluctuations in the surface water elevation of the wetland on the order of a few feet would not have detrimental moisture-related effects on the house foundation. Only prolonged widespread flooding by the Ohio River of the area around the house to elevations on the order of 5 feet or more above the current static groundwater and wetlands surface water levels could lead to a period of increased groundwater-related infiltration into the house basement.

While 2007 was an unusually dry year with only 33.82 inches of precipitation recorded at Huntington, it followed one of the wettest years on record as there was 49.53 inches of precipitation in 2006. The total precipitation for 2007 was 8.49 inches less than the normal precipitation of 42.31 inches. In May 2007, just before the June 2007 wetland evaluation, precipitation was 3.17 inches less than normal and in June, July, August, and September 2007, precipitation was below normal. The less than normal rainfall undoubtedly contributed to a lowering of the water surface of the wetland. However, the preceding year was exceptionally wet with a total of 49.53 inches of precipitation. Five of the last seven months of 2006 had precipitation above the normal and this would have left the wetlands unusually high in early 2007, a year when less than normal precipitation occurred. The Corps has no records of the wetland water surface other than when surveyed in June 2007 but it is common knowledge that the water surface fluctuates with the weather.

14

> Those are the main comments. I just have one more I would like to mention: In the past I have mentioned this about the wells and we do need the water, like Ned said, and another thing I

Response: Potable water is not considered a preservation issue.

brought up several times is it seems like that throughout some of the documents that the Corps has put out over the years, they have left out the fact that General Jenkins was not just a Confederate General and Confederate Congressman, he was a U.S. Congressman before the war, from 1856 to 1860 and I think that is the period that we are going for that we need to make sure that where that is left out, we put that back in that document so that everybody will be aware of the fact that he wasn't just a Confederate Congressman, he was actually elected and was a member of the U.S. Congress from 1856 to 1860.

15

Response: It was an unintentional oversight to omit Albert Jenkins' service in the U.S. Congress. Please see change in the Environmental Assessment and Preservation Plan.

MR. WORLEY: Thank you.

Next we have Mr. Johnny Nance.

MR. NANCE: I am Johnny Nance. I am a professional restoration/preservation contractor, I have been for 25 years.

14

I am not a very good public speaker, but this happens to be a subject that is near and dear to my heart.

I would like to address the restoration of your all's plan that you are saying will be preceding this plan.

Hopefully, you all will be getting on that as quick as possible and we would like to also review to the public those plans also and on the research end, as my wife said -- which she is an expert at -- if it takes only -- I mean, if you need more than documentation and photographs and that type of research to restore something, then we might as well go and bulldoze Colonial Williamsburg because there were four or five original structures down there. The entire rest of that village is a reconstruction from archaeology and a research of period-type buildings.

16

This is a federal style. In the federal style, your window placements, your door placements, were all specifically designed to match that style of structure. So therefore, simply the house gives you a place to start whenever you redo the kitchen and the library because they will reflect exactly

15

the style of the house.

Response: Except for the Jenkins House that can be examined, there is little information on the details of the buildings at the Jenkins Plantation. Under the Secretary of the Interior's Standards, detailed information is necessary to properly restore and reconstruct missing buildings and features. The Corps is bound to follow the Secretary of the Interior's Standards in these matters as directed by WRDA 2007. But, even without that directive the Corps could not undertake less than accurate construction without jeopardizing the National Register listed status of the Jenkins House. The Corps has sought (see, e.g., O'Bannon 2005; Hargrave et al. 2006; Updike 2003) and continues to seek details on buildings and features at the Jenkins Plantation. For example, the Corps is working to enhance old photographs in an attempt to discover construction details.

Researchers of plantation architecture have observed a consistent pattern in the manner in which the land owner's house, slave quarters, and outbuildings were organized in order to reinforce social hierarchies and economic symbolism. That is, the "big house" occupied by the

owner's family was prominent on the landscape and architecturally sophisticated, while the buildings housing slaves and utilitarian activities were clearly subordinated, both in placement, size, profile, and design. Among the first colonial plantations of the eighteenth century, distinction was achieved by lavishing a high style design on the owner's home, while slaves built houses reflecting vernacular traits and a use of scavenged materials.

By the early nineteenth century, "lesser" buildings remained modest and often minimally styled, although many owners began favoring greater architectural unity, and encouraged the use of formal styling on slave quarters and outbuildings. However, it is not presently known whether the Jenkins' Federal style was applied with the same vigor to outbuildings, or whether the family preferred these buildings to follow a more utilitarian design. Without further information, it cannot be known whether the Jenkins outbuildings assumed a Federal style format in plan, detailing, window and door types, moldings trim, roof type, and interior symmetrical layout. Reconstruction of outbuildings will be considered during the reconstruction phase of the project authorized by WRDA 2007.
(Also see response to comment #8, #10 and #12).

Like I said, I am not a public speaker.
Thank you.
MR. WORLEY: Thank you, Johnny.
That completes the list of folks that signed up and I would like to go back to the top again to Karen LeGrand. Would you like to make any statements?
(Declined.)
MR. WORLEY: Melissa Conley?
(Declined.)
MR. WORLEY: Is there anyone else that would like to come up and make a statement?
MR. MILLER: I don't want to make a statement, I just want to --
MR. WORLEY: Please come up because we don't want to miss anything for the record.
If you would, state your name and then your comment.

17

MR. MILLER: My name is Greg Miller.

I used to run the Jenkins Plantation up until about six years ago and what I was wondering was if you all took into consideration not only the water problems and the termite problems, but the

16

Response: According to the facility manager, the house was checked and treated for termites in 2006 when the basement windows were replaced.

18

floors and the bathroom that they have there that wasn't there then and that used to be a library for the General and his brothers. I would just like to see that put back in.

Response: The bathroom is being considered for removal subject to a decision to be reached in consultation with the West Virginia Division of Culture and History. If a decision is made to remove the bathroom features, restoration of this space will be considered under the restoration phase of the project authorized by WRDA 2007.

19

As far as I can remember also, the walls inside the Jenkins house, I have painted those walls probably a dozen times trying to keep the moisture out.

You need to put some type of water-barrier type of protection on the walls so that the moisture can't make it through the brick and into the house.

Response: Paint and other coatings applied to the exterior of historic masonry structures are considered to be more damaging than protective. These applications trap moisture behind coated surfaces and prevent masonry units from breathing and shedding moisture. Rather than the use of moisture barriers, it is recommended that historic masonry structures be managed through proper alignment and maintenance of roof and gutter systems, direction of rain run-off away from the foundation stones to prevent rising damp and maintaining moderate temperature gradients between the interior and exterior of the structure to prevent condensation (Speweik 2007).

That's all.

MR. WORLEY: Thank you, sir.

Any other comments? Is there anyone else that would like to come up and present a comment for the record?

Sure, Johnny. Come back up.

MR. NANCE: I am Johnny Nance.

The one issue I would like to cover under the preservation plan is the basement fireplace openings.

They have been shrunk for modern use and one was a winter kitchen and I would like to see that winter kitchen put back in place that would be

17

part of the preservation of the main structure itself.

20

Response: Restoration of the fireplaces to appearances in keeping with the period of significance will be addressed in the restoration phase of the project authorized by WRDA 2007. Restoring the fireplaces to working condition raises issues of safety, authenticity, and climate control and will be considered in consultation with the West Virginia Division of Culture and History for action under the restoration phase of the project authorized by WRDA 2007.

Thank you.

MR. WORLEY: Anyone else?

Victor?

MR. WILSON: Through all of Karen's hard work and research over in Richmond, looking at the personal property tax rolls, et cetera, she has gleaned a lot of information about the estate.

They list in those tax rolls, the number of horses, the number of cows, the number of hogs.

12 The fact that in, I believe, in the 1850's
13 census, Captain William Jenkins, who was the builder
14 of the home, had a coach and four on his tax rolls
15 and just as we get assessed personal property tax on
16 our vehicles today, he was assessed that on his
17 vehicle back then.

21

18 But we can work backwards from these tax
19 rolls and see when you have this volume of number of
20 animals, number of people living on the estate,
21 carriages, number of horses owned, it is really easy
22 to work back from that in terms of when you get to
23 the restoration stage.
24 You know the fact that all of these

Response: It is easy to move from tax roll and census numbers to envision that housing, barns, and other facilities were necessary during the period of significance. It is quite another matter to accurately envision the appearance of these facilities. Even where the footprint of a building such as the kitchen is known, details that would allow an accurate reconstruction of the building remain unknown. Archaeology has added to the knowledge and examination of buildings and features at other locations that date to the period narrow the possibilities. But, while a concentration of broken glass likely represents the approximate location of a window, it is not known if the window was nine over nine, single-hung, double-hung or if it was non-opening. A threshold stone undoubtedly marks a doorway. However, there are other questions that need answered in order to develop a detailed reconstruction plan. What did the door look like? Was it hinged on the right or left? Was it equipped with a lock? Did it have a window? Was it flat or cross and bible, or some other pattern? These matters may be insignificant to someone who wants to construct a building that may be compatible with buildings of the period of significance but they are extremely important to accurate reconstruction of what was actually there during the period of significance. The key is REconstruction, not simply construction. The Secretary of the Interior's Standards for Reconstruction outlines acceptable and appropriate reconstruction measures to be used by Federal agencies. Anything less would jeopardize the National Register listing of the Jenkins House.

18

1 outbuildings were absolutely necessary in order to
2 conduct the business of the estate, to serve as a
3 hospitable home for visitors, which we know the

President of the United States came to dinner because my brother has a plate that was on the table, that our grandmother said was used there.

Cyrus McCormick, came to the house, saw in his reapers, was a cousin of the family. So these out structures, there is every justification for their restoration.

I am very pleased to see that the preservation work is going to dovetail into the restoration work.

I hope eventually we can get underneath this building and look at its foundations and its wooden structure to see if potentially this is the church that Captain William Jenkins built on his estate.

I also want to check the estate records for his son, William Alexander Jenkins, whose home is still standing across the street on Lunsford Lane. Perhaps when his estate was settled in the 1890's, it makes some reference to this being the church on the property.

19

But we certainly appreciate all of the hard work of Jim and Clara Knight over the years. Having the house opened to visitors from Germany, school busses coming by and all of the people who have just stuck with the Greenbottom Society for all

of these years and this is a very happy day to actually see the progress beginning to happen.

Thank you.

MR. WORLEY: Thank you, Victor.

If you would, please state your name, please.

MS. SORRELL: Kelly Sorrell.

I just want to say that back in October, I had a period wedding at the Jenkins Plantation.

I would like to see on my ten-year anniversary, the house restored and preserved and everything put back together so in ten years from now, or longer, for it to last for everybody.

MR. WORLEY: Thank you.

Karen?

MS. NANCE: Just one of the things that I didn't mention when I was up there and because it is really not going to be part of the plan probably until you do restoration is the African-American

20

heritage.

Because the African-Americans, really didn't live in the house. So when we talk about the preservation work you are doing, it is going to be difficult to tell much of their story until their restoration work is done and then we will be able to tell the story better for the African-American population that lived at the house.

Just one question that just bothered me. There is no fan light. I am sure that is not what you planned, the dormers off, but the fan lights off was probably a mistake, right?

UNIDENTIFIED SPEAKER: On the record, yes. This is an artist's rendering of what it would look like when we removed the dormers and the paint additionally is to be removed. I didn't catch the fan light.

MR. WORLEY: Well, if you are looking, this view is from the rear of the house and that doorway doesn't have a fan on it.

MS. NANCE: Yeah, I was thinking that this was the rearview rendering or the front that didn't have it because we had talked about the dormers being gone.

21

Thank you.

MR. WORLEY: Thank you, Karen.

Ms. Knight.

MS. KNIGHT: I am Clara Knight.

22

I would like very much to see the front of the house and water off the driveway so we could see the front.

You don't take guests into the back of a southern Virginia plantation.

Response: Reconstruction of the drive will be considered in the reconstruction phase of the project authorized by WRDA 2007.

Thank you.

MR. WORLEY: Thank you, Ms. Knight.

We had another hand, I think.

Any other comments?

23

MR. WILSON: When you do your masonry work, if the addition is, in fact, going to come off the house and we hope that it won't come off until you have an auxillary building for office space for the on-site manager, Matt Boggess, a place for the lawnmower to go, restroom because you are not going to have the restroom upstairs any longer.

Response: Final decision will be developed in consultation with the West Virginia Division of Culture and History.

24

When you do that and when you restore the masonry, you are going to have to brick in the door that currently leads from the dining room into the addition because that doorway was put in by Jim and

22

Clara Knight.

Response: Details for all preservation activities will be developed in the preparation of construction documents for Preservation.

The original brick were stored in the garage until, as I understand it, some guy came along who needed some brick to fill his driveway in and the original bricks from the home were taken to his driveway.

Anyhow, if we could find out where that

driveway is and get the original brick back.

MS. KNIGHT: When The Division of Natural Resources lived there and they needed the room in the garage, so they had some man up the road -- I know where he lives -- take the bricks up and put them in the road to the river. They are in the Spurlock Creek Road to the river, sometime after we left there.

MR. SHAW: Actually, I think you are wrong, Ms. Knight.

MR. WORLEY: Kem, would you stand up?

MR. SHAW: Certainly.

MR. WORLEY: State your name, please.

MR. SHAW: Kem Shaw. I am in the area management group of Greenbottom.

I believe that Ms. Knight is wrong because when the bricks were taken out, we moved those over

to the old tobacco barn. The tobacco barn was old and falling down and while we were cleaning it up, someone stole the bricks out of there.

We did not give these away, or sell them, or anything. They were stolen, actually.

MS. KNIGHT: They weren't given away. This man told me that he was told to take them over and put them in the road to the river at the Spurlock Road because it was impassable.

MR. WILSON: Well, in any case, bricks are going to have to go back in that doorway and if we can ascertain where they have gone, that would be wonderful.

25

There was one doorway, which is the one closest here and that was used to bring meals from the outdoor kitchen into the dining room and in the winter, access would be up through this door out and into the dining room, so that doorway needs to stay.

Response: Removal of this authentic doorway has never been proposed.

26

Also, another architectural feature that probably needs to be removed is the area beneath the staircase. That staircase to the basement was presumably not there because the wall cuts into those windows there, so that staircase, below the main staircase, probably needs to be taken out.

24

Response: Consideration about the age of the interior stairway to the basement will be explored in the restoration phase of the project as authorized by WRDA 2007.

27

In the archeology digs that were done by the Corps, they recovered and found out that there were actual stairs where this window is here in the basement, there are stone stairs going down and there was a doorway there, so if you are really doing an accurate preservation of the house, you would want to reopen this, reopen the window on the

other side which had stairs.

There is another symmetrical window on this end, which presumably if you dug down, you would find stairs, because the house lived with its dependencies, you have to be able to access -- and as Karen mentioned with the question of raising the house was brought up, the first floor was a living floor in the house.

We have a letter, a family letter, where Captain Jenkins' daughter is asking her father, or states that her father has said that the people -- and I don't know who the people are, whether they were African-Americans who were being schooled on the site -- but the people could have his globe that was in the living room to use down below it in the school room.

So this was a room that was very much an important part of the house and these stairways out connected it to the adjacent outbuilding.

So those stairways really need to be restored if we are going to do a full restoration.

Response: Restoring the outside stairs will be considered in the restoration phase of the project authorized by WRDA 2007.

28

Also on the front of the house, as you have seen by the photographs at the beginning of the program tonight, we have photographs of the original construction of the front porch, which had benches that were across from each other.

Johnny noticed years ago that the wood railings coming down that porch turned in the same manner that the railing in the main hallway in the house, it turns at the end, so they were repeating the same architectural technique in both railings.

So the front porch needs to be brought back the way it was in those photographs.

Response: Restoring the porches will be considered in the restoration phase of the project authorized by WRDA 2007.

29

Also in the garage and for many, many years, was a cardboard box with the hinges that went to the shutters that were on the front of the house. You saw those shutters in one of the first photographs.

The spacing for those hinges is still in the window sashing, you can see where those hinges were. So if those could be retrieved and put back

26

on the house, that would be part of the restoration.

I have spoken to a woodworking school here in Huntington, where they would be very anxious to come out as a project for the students -- these are kids that have dropped out of high school -- to manufacture a set of shutters for the house.

We know the exact dimensions because we have the photographs. Just as we know how to reconstruct the outbuildings because you can measure from this building and use and measure to see exactly the size of the outbuildings.

Response: Restoring the shutters will be considered in the restoration phase of the project authorized by WRDA 2007.

Anyhow, there are quite a few features that need to be considered.

Thank you.

MR. WORLEY: Thank you, Victor.

Do we have any other comments?

We also have another dignitary, Ms. Carol Miller, with the West Virginia House of Delegates. Sorry I missed you before.

If there are no other comments, that will conclude the official comment period of taking oral comments.

If you have your card and you have comments written on them, please make sure we get

them. If you want to take them home with you and fill them out, that's fine.

If you have a letter that you would like to send to us with your comments, the address and where to mail them to is in your packet, so please provide that to us.

We have our points of contact, our main points of contact -- and I think this is in your information packet as well -- Lisa Morgan, our project manager and Amanda Dethman, our lead planner on this project, if you have anything that you want to talk specific details about, please contact them.

Of course, everybody on the team is

eligible to be contacted, as well, but those are the two lead folks for us on this project, so please contact them.

We have some key members that are going to stay around and talk to you as long as you want to talk.

Lisa, is going to be here, Amanda and John Preston, Todd Mitchell, our architect and Brentley Jackson, our archeologist, are all going to stay here and stay here as long as you want and answer questions after the meeting.

But if you have an official comment or something that you want to make sure is addressed in the report, please document it for us so that we can make sure that we don't miss that.

All of those will be responded to and we want to make sure that we capture everything we can.

Thank you for everybody coming tonight. I hope you had a good evening.

Thank you.

(Public meeting concluded.)

To Wit: State of West Virginia

I, Michele G. Hankins, a Notary Public and Court Reporter within and for the State aforesaid, do hereby certify that the public meeting was taken by me and before me at the time and place specified in the caption hereof.

I do further certify that said testimony was correctly taken by me in stenotype notes, that the same was accurately transcribed out in full and reduced to typewriting, and that said transcript is a true record of the testimony.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which these proceedings were had, and further I am not a relative or employee of any attorney or counsel employed by the parties hereto or financially interested in the action.

My commission expires the 13th day of February 2013.

Given under my hand and seal this 25th day of April 2008.

_____

Michele G. Hankins
Court Reporter
Notary Public

AGENCY RESPONSE TO SHPO COMMENTS

-----Original Message-----
From: Chris Knorr [mailto:Chris.Knorr@wvculture.org]
Sent: Thursday, April 24, 2008 3:26 PM
To: Dethman, Amanda J LRH
Cc: Adam Hodges; Susan Pierce
Subject: Jenkins comments

Amanda,

I just had a couple issues with the Draft Environmental Assessment, Jenkins House Preservation Actions.

Pg. 6-7 of Pres Plan, 4.2, dealing with the roofing, particularly the last sentence.
Although I do believe that alternatives to wood shingles can be considered, I think that the possibility of using wood shingles should not be ruled out at this point. There are installation methods, such as the use of "Cedar Breather" (http://www.benjaminobdyke.com/html/products/cedar.html) , which can lengthen the life span of wood shingle/shakes, when installed over solid sheathing, thus improving cost effectiveness.

Response:
Because current information is not sufficient to know exactly what material and type of roofing was originally used on the house, the Corps will make every effort to select a period appropriate replacement. The intent is to mimic as closely as possible, a wood shingle roof. Therefore, strong consideration will be giving to using actual wood shingle materials with an appropriate and breathable decking system. However, due to the Corps' mandate to maximize public funds in a manner that will meet federal preservation guidelines and produce a long lasting result, alternative materials will be explored and chosen if an authentic wood shingle appearance can be achieved. The reason to select a composite roofing material would be the benefit of a longer life expectancy.

Pg. 10 of the Pres Plan, 4.4 Windows
Given that the windows may be easily viewed from ground level, and that all sides could be considered primary facades, I do not believe that there would be an acceptable alternative to wood for the proposed window replacements. Also, given the fact that the structure is indeed a house museum, it is a project which should more closely follow the Secretary of the Interior Standards for Preservation, or Restoration, rather than the more flexible Standards for Rehabilitation.

Response:
The Corps agrees that the home's windows are one of its most visible and strongest character defining features. The replacement of windows will demand that new units conform exactly to the format, molding profiles, depths, proportions, textures, and overall appearance of Federal style sashes of the period of significance. If a wood alternative cannot achieve all of these qualities, wood units will be used. However, if units of an alternative material can produce the

same historically appropriate appearance and meet the Secretary's Standards for Restoration, the Corps may consider non-wood windows in the interest of maximizing public funds for a long lasting preservation result.

Should you or Lauren want to discuss this any further, please feel free to contact me.

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AGENCY RESPONSES TO WILSONS' COMMENTS

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Re: Comments on the Draft Environmental Assessment, Jenkins House Preservation Actions

Thursday, April 24, 2008 sent by email

Draft Colonel's Finding ¶ 2
Does not refer to WRDA 2007
Response: The proposed preservation actions are authorized by the cited acts.

Draft EA
p 5 para 2
What impact did the 2007 drought have on the climatological study? Explain why the consultants never visited the site.

Response: The West Virginia State Climatologist was consulted to advise the Corps of what studies would be required to determine any effects on the structure from the wetland. The Climatologist explained that the situation required the expertise of a "boundary layer meteorologist," and advised we contact the Ohio State Climatologist (OSC), a specialist in this field of climatology. The Corps requested the OSC to provide a scope for a study to determine the wetland effects on the structure. The OSC was provided maps and aerial photography and specific information about the site. It was the OSC's determination that no study was required because prevailing air currents in this area would carry excess moisture from the wetlands away from the structure. The OSC did not deem a field visit to be required. The OSC's evaluation was not based on current weather (drought), but on long-term meteorological understanding; therefore, the drought was not material to his recommendation for no further study.

p 6 para3
The use of the phrase "intensive research" is misleading since there were many sources available that were not used. These can be identified by members of the Greenbottom Society if the COE so requests.

Response: The Corps contracted for archival research to gather and digest information on the house and dependencies at the Jenkins Plantation. Input was sought and received from members of the Jenkins family, the Greenbottom Society and others. The research relied, in part, on published historical works (see, e.g., Dickenson 1980, 1989; Hecker 1961; McGehee 2003, 2006; Nance 1998; Sawrey 1990) and on the results of archaeological surveys and excavations (Hughes and Kerr 1990; Hughes and Niquette 1989; Kerr and Clay 2002; Updike 2001, 2003). The archival research report documents intensive research, conducted at a number of locations, and substantiates the findings of earlier researchers that there are few known records, letters, photographs, family papers, or other materials that provide information on the Jenkins House and its dependencies (O'Bannon 2005). Preservation recommendations were based upon a number of existing documents, analyses and plans, which constitute a considerable research effort. These documents, however, do not deny the value of continued research. The Corps is interested in discovering and using additional information should any become available and welcomes the input of all interested parties.

P 8 para 2
Add: Gen'l Jenkins was a "national political and military figure"….
Response: It was an unintentional oversight to omit Albert Jenkins' service in the U.S. Congress. See change in the EA and Preservation Plan.

para 3
The statement "modern management of the wetlands" is misleading. The area was compromised, through flooding, by the COE in tandem with DNR; this should be acknowledged and stated in the EA. The acreage was farmed from 1825 until the COE's taking. As a Historic Register site, the flooding was never subjected to formal Historic Preservation Act review. In fact, the COE received a letter from the Federal historic review agency stating this. I have provided a copy of the letter to the COE which must included in this EA.
Response: Modern wetland management is one of several factors mentioned that compromise the immediate landscape of the house. The wetlands will be considered in the reconstruction phase of the project authorized by WRDA 2007.

P 9

The COE has failed to list, and therefore address, with these Preservation matters in the narrative. Testimony at the Greenbottom meeting addressed some of these in more detail:

Flooring
Trim
Hardware
Shutters

Response: The need to identify original trim and detailing for use as templates in future restoration is discussed in the plan. The intent of 5.3 was that details such as original flooring, trim, and features such as hardware and shutter should be identified and recorded for future restoration work. Restoration of these elements will be considered in the restoration phase of the project authorized by WRDA 2007.

Removal of the 2nd floor bathroom, reconstruction of the office

Response: If a decision is made, in consultation with the West Virginia Division of Culture and History (WVDCH), to remove the bathroom features, restoration of this space will be considered under the restoration phase of the project authorized by WRDA 2007.

Outside staircases (4, one in use) to the 1st floor (basement)

Response: Restoration actions are beyond the scope of the current preservation work. Restoring the outside stairs will be considered in the restoration phase of the project authorized by WRDA 2007.

Closing modern doorway to the addition *original brick used in the closure of the of the 3 staircases could be used to fill in doorway when the addition is removed*

Protection of the foundation stones in the patio and in the lower section of the addition

Response: The details for removal of the modern addition, which includes protection of foundation stones and closing modern doorway, will be addressed during development of construction documents for preservation.

Septic or pump-and-haul
Potable water

Response: Potable water and septic/pump-and-haul are not considered preservation issues. Potable water and sanitation services will be provided for contractor employees by the contractor during the preservation project.

Fire protection (using techniques developed for historic structures)

Response: Decisions will be reached in consultation with the WVDCH regarding appropriate levels of fire protection.

The house and its dependencies must be considered as one. The residents of the house during the 1825-1860 period could not have lived without them. This means that the 25 foot perimeter must be expandedto incorporate them. It should be further noted that the structure for the house slaves abutting the house is not mentioned. It probably was above the kitchen.

Response: The proposed preservation actions are limited to the structure of the Jenkins House. A 25 foot perimeter would inappropriately limit the construction work limits for proposed preservation actions. See change in EA. The dependencies will be considered in the reconstruction phase of the project authorized by WRDA 2007.

Greenbottom was a self sufficient plantation. The lumber and brick, etc. were manufactured by slaves, on site.

Response: Although plantations can be considered to have been self sufficient, we lack information on the sources of building materials such as lumber and brick used to construct the Jenkins House. It is possible that the lumber and brick were manufactured on site but we have found no evidence of facilities for these activities. By the time the Jenkins House was constructed, shipment of goods on the Ohio River was commonplace and it is possible that such materials were brought to the site from other points of manufacture.

Have the archeologist and COE historian been credentialed as experts in Virginia Federal archeology or architectural design?

Response: The Huntington District archaeologist's education and experience qualifications exceed the Office of Personnel Management (OPM) Standards for federal employees in full performance Archaeology Series and History Series positions. His qualifications also exceed the National Park Service's Professional Qualification Standards in both Archaeology and History, published as part of the larger *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* as well as the National Park Service's Essential Competencies for Professionals in both Archaeology and History.

The Seattle District's architectural historian possesses education and experience that exceeds OPM standards for federal employees meeting performance expectations for an historian (architectural historian) and also exceeds the National Park Service standards for History, published as part of the larger Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. The architectural historian holds a B.S. in Anthropology (archaeology emphasis with field experience) and a Master's Degree in historic preservation from the University of Oregon, and has held internships with the National Park Service, Technical Preservation Services division, Washington, D.C., and the University of Pennsylvania's historic preservation practicum in Italy. She has served as architectural historian with three state historic preservation offices over a twelve year period, and for the past seven years has worked with the U.S. Army Corps of Engineers, Center of Expertise for the Preservation of Historic Buildings and Structures, addressing a range of architectural history issues and projects throughout the country.

I ask this because the historian notes on p 2 of the Preservation Plan that "…Jenkins resided in an affluent region of Rockbridge County..". The house he lived in, "Buffalo Forge," does not represent the style of the Jenkins House. Historical material available to the COE notes that Jenkins lived in Tidewater Virginia where he owned a fleet of coastal vessels. Clearly he was influenced by the Federalist style of post-Revolution Virginia.

Response: The Corps has not questioned William Jenkins' knowledge of Federalist style or its application at the Jenkins House. The Preservation Plan consistently mentions that the Jenkins House projects a regional and somewhat late application of the Federal style of residential architecture. The plan does not assert that the family's Buffalo Forge house is identical to the later Greenbottom home, but references the presence of high style architectural trends – including the Federal style – that were common to the place where the family resided in Virginia. The Preservation Plan observes a typical pattern of westward moving families who drew inspiration from high style homes in their homeland, with which they were familiar. This pattern holds true as American settlement moved all the way to the West Coast, and accounts for the sometimes later appearance in the West of architectural styles that had already passed out of fashion in the East.

During discussions, the archeologist questioned whether the dependencies can be reconstruction based on the existing foundations. In fact, the foundations provide an excellent guide to future restoration.

Response: The subject of reconstruction of dependencies is beyond the scope of the present EA which is limited to preservation actions at the Jenkins House. As stated in the Preservation Plan in Section 7, foundation remnants and artifacts are not adequate for understanding the buildings that formerly existed. See clarification in Preservation Plan that this is based on information available at this time. It can be said that the foundations help locate the former outbuildings, but provide limited information about building design and style, exterior and interior materials, roof type and shape, window and door placement, dimensions, and type, etc. Reconstruction of dependencies will be addressed in the reconstruction phase of the project authorized by WRDA 2007.

Turkey Creek should be grubbed out to the River and drains installed to allow water flow into the creek from behind the house. This will help preservation and site access. The fact that it has not been done reflects poorly on the COE and DNR.

Response: The Corps concurs that water collects in the swale and appears to not readily drain into Turkey Creek. On April 24, 2008 benchmark leveling was performed by the District to aid in evaluation of this comment. A cross-section was surveyed that extended roughly parallel to the North-South alignment of the house and began at the basement entrance at back of house, extending to the right descending bank of Turkey Creek. At this cross-section, the top of bank of Turkey Creek is about 547.5 feet Mean Sea Level (MSL). The low point of the swale is about 546 feet MSL. A beaver dam, some 150-200 yards downstream of the cross-section, was blocking all flow of Turkey Creek. The water level in that pool was about 545 ft. Basement floor elevation is

about 550 ft. Wetland elevation at this time/date was about 534.5. Based on this information the drainage path would be from the swale to the wetland, and not to Turkey Creek. Although surface water in close proximity to the house is a preservation issue, the surface water which collects in the swale would not be affecting the structure. Therefore, this is not a preservation issue and accordingly is not addressed in this evaluation.

The flooded acreage in front of the house should be allowed to dry out by destroying the weir and continuously removing beaver dams. It is no longer an effective hunting preserve since only black powder weapons and bow and arrows are now permitted. By the time the restoration plan takes effect, this land should revert to historic tillable acreage in order to provide an accurate interpretation and be in compliance with the Historic Preservation Act.
Response: The wetland area will be considered under the reconstruction phase of the project authorized by WRDA 2007.

The narrative on page 2 contains errors and omissions relevant to the preservation project. I suggest that the following rewrite be included:

"2. PROPERTY HISTORY

Captain William Alexander Jenkins purchased the 4441 acre Greenbottom tract in 1825. It was paart of the Jays Grant, up-river from the historic Savage Grant, and had been owned previously by Virginia Governors Nicholas and Cabell (for whom the County was named). The tract was half Ohio River bottom land and half forested hills to the east

Jenkins orientation to water transportation began when he owned vessels that carried goods and passengers between Richmond and Lynchburg on the James River. Governor Cabell had a home in Lynchburg, "Point of Honor," built in 1815 in the Federalist style.

Jenkins next owned a fleet of coastal ships (hence "Captain") out of Tidewater Virginia. These sailed from New York to the Caribbean. He sold them and moved to eastern Rockbridge County, Virginia, onto property and buildings: "Buffalo Forge", still standing He travelled several times to the Ohio looking for opportunities, typical of the western movement.

However, he found that commercial farming was impractical on the Ohio River because of the rigors of "pole boating" upstream against the swift current. He met Robert Fulton and travelled on his steamboat "Clermont" in 1807. This opened up new possibilities to him for commerce on the Ohio. By the time he purchased Greenbottom, farming economics based on steamboats was well established. The plantation's whole orientation was to the River. Slaves provided household service, crafts, brick making and farm labor.

The tract provided two agricultural opportunities: the bottom land could be tilled for crops to sell and to feed the family and slaves; hogs could free-range in the hills, eating acorns and other nuts. Jenkins shipped hogs and crops to Cincinnati, Ohio and other points down-river. It was a major economic enterprise, as tax records show, the most productive in western Virginia.

The family and slaves moved from Buffalo Forge and built temporary housing. Construction began on the house and ancillary structures. These were built by slaves from lumber cut from trees on site and bricks made in its own brickyard. The house was completed in 1835.

The house, immediate dependencies, barns, warehouses, slave quarters, landings and tillable acreage, in concert, illustrate the comprehensive historic architectural and economic nature of the property.

Delete the first sentence of the 2nd para.
Response: The PROPERTY HISTORY narrative is intended to provide a brief background. The mandated purpose of the plan is to identify existing conditions and threats to the material building and to recommend specific treatments to address them. The intended utility of the document is that of a preservation action plan, and was not meant to serve as a comprehensive history of the Jenkins family and the plantation operation. A brief property overview was provided only as a summary and to orient the larger discussion of preservation issues. In developing the plan, the history of the Jenkins House and what is known about the surviving house and former outbuildings was taken directly from existing historic preservation plans, documents, articles, publicly provided information, and from the National Register nomination. No information or conclusions were developed independently. Published sources may be consulted for more details on the lives and times of the Jenkins family.

4th para. Jenkins served in the US Congress.
Response: It was an unintentional oversight to omit Albert Jenkins service in the U.S. Congress. Please see change in text. See change in EA and Preservation Plan.

There is little mention of slaves throughout the document – 80 were noted in the1860 census
Response: The document is not meant to be present an exhaustive history of the Jenkins Plantation. Jenkins' slaves, their lives and roles on the plantation have been reported elsewhere (see, e.g., Dickenson 1980, 1989; Hecker 1961; McGehee 2003, 2006; Nance 1998; Updike 2001, 2003).

P 10 Original windows should be preserved; new windows should replicate originals; and, new glass should replicate original.
Response: Concur; see clarification in the EA and Preservation Plan.

P 13 para 1. The sentence beginning "To fully plan…" should introduce a separate paragraph. The development of a landscaping plan should one of the preservation contracts. It should include the area in front of the house to the River including rehabilitation of the road to the passenger landing.
Response: Alterations to landscapes is beyond the scope of the present EA which is limited to preservation actions at the Jenkins House. Reconstruction of landscape features will be considered in the reconstruction phase of the project authorized by WRDA 2007. The Preservation Plan includes some discussion of setting and landscape actions beyond preservation for the purpose of relating such work to preservation planning.

5.3

The first sentence is misleading and incorrect and demonstrates a paucity of research, or lack of knowledge about this historical period

Response: The sentence is an accurate statement of what is now known that can be applied to restoration actions. Except for the Jenkins House that can be examined, currently there is little information on the details of the buildings at the Jenkins Plantation. See change in Preservation Plan. Under the Secretary of the Interior's Standards, detailed information is necessary to properly restore and reconstruct missing buildings and features. The Corps is bound to follow the Secretary of the Interior's Standards in these matters as directed by WRDA 2007. But, even without that directive the Corps could not undertake less than accurate construction without jeopardizing the National Register listed status of the Jenkins House. The Corps has sought (see, e.g., O'Bannon 2005; Hargrave et al. 2006; Updike 2003) and continues to seek details on buildings and features at the Jenkins Plantation. For example, the Corps is working to enhance old photographs in an attempt to discover construction details.

P 14 fig 11. This mantel comes from the demolished historic Shelton House on Rte 60.

Response: Karen Nance recently informed the Corps of the origin of the mantel that she and her husband donated to the Jenkins House Museum. The Preservation Plan will be corrected to reflect this information. It has been clarified that the current mantel surround from the Shelton House depicted in this figure was installed in the late 1990s. It replaced a 1930s fireplace that had earlier replaced the original. It should be noted, however, that this present fireplace surround is not appropriate to the Jenkins House due to its incompatible scale, proportioning, styling, and overall lack of adherence to the Federal style program reflected in original mantels found in the house.

7.2

This paragraph needs to be rewritten or rewritten since it also appears to reflect incomplete information.

Response: Recommendations made in Sec. 7.2 are not intended to limit or dictate the scope of future restoration/reconstruction efforts. Rather, the intent of this section is to provide considerations for long-term preservation of the site, based upon the potential for future restoration/reconstruction and information currently available. Restoration and reconstruction actions will be developed and considered during future planning efforts in response to WRDA 2007. See clarification in the Preservation Plan.

Time is of the essence and these comments reflect on restoration per se rather than preservation of the house and the foundations of the ancillary buildings. The restoration scoping the COE should contract with the University of Virginia, School of Architecture, Department of Architectural History which is pre-eminent in this particular field.
A U Va architect should oversee the removal of the addition, the closure of the doorway and the protection of the stones. This architect should also oversee the removal of the dormers.
Response: Appropriate skills and credentials of contractors identified in the guidelines to the Secretary of the Interior's Standards will be utilized during the selection and screening of contractors. The intent of the Corps during preservation and restoration is to hire qualified, credentialed historic preservation expertise with a record of projects undertaken on regional buildings of this nature and significance.

The stairway to the basement should be tested by a dendrochronologist to determine whether it is original to the house.
Response: Consideration about the age of the interior stairway to the basement will be explored in the restoration phase of the project as authorized by WRDA 2007.

AGENCY RESPONSES TO NANCES' COMENTS

Johnny & Karen Nance
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304-736-1655

April 23, 2008

Amanda J. Dethman, PM-PD-R
U.S. Army Corps of Engineers, Huntington District
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RE: Draft Environmental Assessment Jenkins House Preservation Actions

Dear Ms. Dethman:

To quote an old adage, "when we forget our past, we are destined to repeat it." Therefore, as individuals who have been involved in this project for 20 years, we feel those 20 years of experience need to be considered. For you, Ms. Dethman, this is new ground, for us it is not. We have been here numerous times over the past 20 years with the Corps and we see little change. This is not the first study and/or plan we have reviewed. A common thread is that past comments and concerns are not addressed in the new study/plan.

Response: The Corps solicited comments at the public scoping meeting on April 24, 2007. All comments received are included in the Draft Environmental Assessment and were considered by the Corps in preparation of the Draft Environmental Assessment and the Preservation Plan. Comments that were not applicable to preservation activities at the Jenkins House structure were not specifically addressed as they are not appropriate to the planned action. They will be addressed in the development of restoration and reconstruction actions if they are appropriate to those activities. When observations or statements of a general nature are received, the Corps makes note of receiving and considering the comment but does not respond as a response seems not to be solicited.

Every time we are told this is a new beginning. Thus, we must begin again providing the same comments and concerns. Needless to say, we are a little frustrated, but for your information, the following comments are being provided.

- The Deadline of Sept. 2009: For 19 plus years, under the Historic Preservation Act, the Corps has had a legal obligation to preserve the Historic Jenkins House Site that it purchased. The Corps did not have to purchase the house and surrounding land. The Corps could have mitigated elsewhere such as on site at the Lock and Dam Project as is

common or at the DNR McClintock Duck Hunting Facility. If the Corps had done an EIS on the Green Bottom Property, as it did on the Lock and Dam Property, it would have discovered before purchase that the Green Bottom Property had extensive Cultural Resources such as the Historic Jenkins Plantation Site and numerous Native American and African-American Sites including the Historic Clover Site. Thus, the Green Bottom Property should have been excluded as a possible site to use for mitigation of loss wetland at the Lock and Dam Property. The logical place to have mitigated the wetlands would have been back on site at the Lock and Dam Property because the Native American and historic cultural resources were already being destroyed due to construction. The Green Bottom Property selection necessitated the disturbance of Native American and historic sites. The Corps was well aware that it had purchased a National Register Site that was located in a flood plane and it was required by law to preserve the site. Thus, the Corps should not have waited nearly 20 years to admit it was responsible for preserving the Historic House/Site in place. Now that we are running out of time to get the work done, how does the Corps plan to mitigate the loss of time?

Response: Appropriate mitigation measures for the RC Byrd (formerly Gallipolis) Replacement project were considered in the *Gallipolis Lock and Dam Replacement, Phase 1, Advanced Engineering and Design Study, General Design Memorandum, Main Report and Environmental Impact Statement,* dated February 1981. Following construction of the Lock and Dam Replacement project, a limited acreage of project lands remained available for fish and wildlife mitigation. Suitable areas were utilized to the maximum extent available for on-site mitigation. However, off-site locations were also needed to fully mitigate for lost habitat. Resources within the Gallipolis and Greenup pools were inventoried to establish baseline conditions and identify potential mitigation sites (Planning Aid Report, U.S. Fish and Wildlife Service 1980). Alternative off-site locations posed a number of challenges for achieving project mitigation requirements. The Lesage/Greenbottom Swamp area was selected as the most suitable area, given the contiguous floodplain tracts available with a diversity of habitat types and existing wetlands suited for enhancement and management. Selection of the off-site mitigation area at Greenbottom incorporated both public and agency review as documented in the Environmental Impact Statement.

The Corps is currently moving forward with preservation at the Jenkins House. The Corps must follow established procedure, using statutory authority as well as guidance from its Washington headquarters. Statutory authority for restoration and reconstruction has been lacking until the passage of WRDA 2007.

We have been told that the date can be extended, but I saw nothing definitive in the plan that assures us of this fact.

Response: Possible extension of the time frame for restoration and reconstruction work must await guidance from Corps Headquarters.

- The wetlands in front of the Historic House: The plan does acknowledge that the wetland in front of the house has had a negative impact on the house's situs as well as the railroad and state road. However, the House was not on the National Register when the railroad and state road were constructed; it was on the Register when the wetlands were constructed by the Corps. Therefore, I would have expected something in the plan to correct this negative impact such as a plan to mitigate the wetlands in front of the house elsewhere.

Response: The Corps believes that the wetland is one of several intrusions that have had a negative effect on the historic setting of the house. However, the proposed action is limited to preservation actions at the house itself, not other features or landscape. The wetlands will be considered in future planning actions for reconstruction authorized by WRDA 2007.

Instead we got a water study done during one of the driest summers on record when the Corps/DNR had drained the pond in front of the house that concluded the pond/wetlands in front of the house had not raised the local water table and was not damaging the house. Since the pond of water would have been the source of the higher water table around the house and had ample time to dry up, the tests do not reflect the normal soil conditions around the house. I simply do not believe the results of the study and I believe that the timing of the study is suspect and was deliberately taken at a time when the pond of water was no where near the house and the surrounding ground was unusually dry. Therefore, I would suggest that the location of the pond during the tests be determined and the pond never allowed getting any closer to the house unless the Ohio River is in flood.

Response: Neither the Corps nor DNR took any action in 2007 to lower the surface of the water in the wetland. The Corps recognizes that the survey was conducted in a year with less than average precipitation (33.82 inches in 2007 is 8.49 inches less than the normal of 42.31) but the 2007 survey occurred in the year following the extraordinarily wet year of 2006 with 49.53 inches of precipitation that would have raised the wetland surface to a level above normal. However, the conclusions of the survey are based on the capacity of the soils for capillary action and elevation data. Groundwater elevations determined from acquired well and soil boring data during this evaluation indicate that the static groundwater level near the Jenkins House is similar to the elevation of the water surface in the wetland. Historical information indicates that subsurface hydrogeologic conditions (e.g. groundwater levels) near the house and adjacent wetlands are likely similar today to what they have been in the past. Measured surface and groundwater table elevations, as well as the elevation of significant capillary moisture, were all well below (i.e. ~5.0 feet below) the elevation of the Jenkins House basement floor (549.85 ft). The elevation of the wetland is controlled by a beaver dam having top elevation of 544.93; this elevation was determined during the recent site survey. The top of the weir was found to be 543.25 during the recent site survey. Future natural or beaver-induced fluctuations in the surface water elevation of the wetland on the order of a few feet would not have detrimental moisture-related effects on the house foundation. Only prolonged widespread flooding by the Ohio River of the area around the house to elevations on the order of 5 feet or more above the current static groundwater and wetlands surface water levels could lead to a period of increased groundwater-related infiltration into the house basement.(Soils Engineering Section, USACE, Huntington District 2007.)

While 2007 was an unusually dry year with only 33.82 inches of precipitation recorded at Huntington, it followed one of the wettest years on record as there was 49.53 inches of precipitation in 2006. The total precipitation for 2007 was 8.49 inches less than the normal precipitation of 42.31 inches. In May 2007, just before the June 2007 wetland evaluation, precipitation was 3.17 inches less than normal and in June, July, August, and September 2007, precipitation was below normal. The less than normal rainfall in 2007 undoubtedly contributed to a lowering of the water surface of the wetland. However, the preceding year was exceptionally wet with a total of 49.53 inches of precipitation. Five of the last seven months of 2006 had precipitation above the normal and this would have left the wetlands unusually high in early 2007, a year when less than normal precipitation occurred. The Corps has no records of the wetland water surface other than when surveyed in June 2007 but it is common knowledge that the water surface fluctuates with the weather.

Furthermore, as in the past, the concern over the contaminated well was not address in the plan even though it has been brought up numerous times by the public. Could it be because the Corps could dry up the yard for its study, but not decontaminate the well for its study?

Response: Potable water is not considered a preservation issue.

- Reconstruction of Outbuildings and Visitor's Center: In addition, the US Congress mandated that the Corps reconstruct out buildings. The Corps told the public that this plan could only cover preservation and it was waiting for guidance to plan restoration and reconstruction. However, the plan did cover restoration/ reconstruction.

Response: The Draft Environmental Assessment and the Preservation Plan are different documents. The Draft Environmental Assessment covers the present project -- preservation actions at the Jenkins House. The Draft Environmental Assessment does not cover restoration actions at the Jenkins House or reconstruction efforts of outbuildings or landscape features, as those actions are outside the current preservation authority. The Preservation Plan focuses on preservation efforts at the Jenkins House but has a wider scope to include contemplation of restoration and reconstruction actions. The Corps' intention for preservation goals is that all actions will be compatible with future restoration goals.

Although preservation entails the protection and conservation of *existing* historic structures and material, any credible preservation plan should always consider long-range site planning that may have an impact on the ability of the subject building to maintain its National Register listing and overall integrity of setting and association. Anticipating future site development issues can also help focus preservation efforts and head off any actions that might compromise the subject building. Because the Corps is required to maximize and protect its investment of public funding, it must be mindful that future actions be compatible with current preservation work. Restoration and reconstruction await Corps Headquarters guidance on the implementation of WRDA 2007. There was no mandate for a visitor's center.

The slides that were presented at the public meeting did not cover restoration/ reconstruction, but under section 7.2, the Corps says there is not enough evidence for reconstruction and the research has been exhausted. I do not believe the research is exhausted because the Corps' research merely went back over prior research done by others. When asked why the Corps' researcher did not go to New York City, etc. to look where others had not had the opportunity to look, the public was told it wasn't in the budget.

Response: The Corps has sought (see, e.g., O'Bannon 2005; Hargrave, et al. 2006; Updike 2003) and continues to seek information on buildings and features at the Jenkins Plantation. Archaeological investigations have provided some data on former buildings but not enough to allow faithful reconstruction. Information on buildings and features and suggestions for sources was sought from the public and from the Greenbottom Society. The contracted archival research effort did examine New York records as well as records at a number of other locations but found nothing that contributed to our knowledge of buildings and features at the Jenkins Plantation (O'Bannon 2006). The Corps is working to enhance old photographs in an attempt to discover construction details of the house, other buildings and features recorded in known photographs. Except for the Jenkins House that can be examined, there is little information on the details of the buildings at the Jenkins Plantation. Under the Secretary of the Interior's Standards, detailed information is necessary to properly restore and reconstruct missing buildings and features. The Corps is bound to follow the Secretary of the Interior's Standards in these matters as directed by WRDA 2007. But, even without that directive the Corps could not undertake less than accurate construction without jeopardizing the National Register listed status of the Jenkins House.

Furthermore, I do not agree that the research that has been done is not adequate compared to other sites that I have visited. I feel the Corps is deliberately holding the standards too high by insisting photographs, plans, etc. must be available.

Response: The Corps is carefully following the instructions of Congress, expressed in WRDA, to use the Secretary of the Interior's Standards in preservation, restoration and reconstruction. Copies of these Standards are attached in Appendix I.

However, funds have been spent on an interpretive film of the archaeology done to date that serves no immediate need especially since the Corps is trying to get out of reconstruction. The funds would have been better spent on preserving the brick, etc. As far as we are concerned, interpretive signage at holes in the ground is not sufficient interpretation for such a significant national site. Our story cries out for more than a hit and a miss interpretation.

Response: Some information about dependencies was discovered in the archaeological excavations; the film serves to share that information with the public. The subject of reconstruction of dependencies is beyond the scope of the Environmental Assessment which is limited to preservation actions at the Jenkins House. Reconstruction of dependencies will be addressed in the reconstruction phase of the project authorized by WRDA 2007.

- The African-American Story: Another common thread found in Corps documents throughout the years: the African-American Story is virtually ignored. It could be because without the reconstruction of outbuildings and a visitor's center the telling of the African-Americans' story on the Plantation will be greatly diminished. Thus, since the Corps is already planning to not reconstruct, the Corps sees no need in planning to tell their story.

Response: The document is not meant to be present an exhaustive history of the Jenkins Plantation. From among a myriad of historical topics, slaves, their lives and roles on the plantation have been reported elsewhere (see, e.g., Dickenson 1980, 1989; Hecker 1961; McGehee 2003, 2006; Nance 1998; Updike 2001, 2003). The plan acknowledges the importance of the African American role at the Jenkins House, and encourages selection of the best possible means of interpreting that story. Restoration of the house and reconstruction of out buildings and landscape features will be considered in the restoration and reconstruction phases of the project authorized by WRDA 2007.

US Congressman Albert G. Jenkins: Another common thread of Corps documents, once again the historical significance of Albert G. Jenkins is down played in the plan. The plan leaves out the fact that Albert G. Jenkins, prior to the Civil War, was a **US Congressman**, 1856-60. He was not just a Confederate Congressman and Confederate General. He was not just locally significant, but national significant.

Response: It was an unintentional oversight to omit Albert Jenkins' service in the U.S. Congress. Please see change in text.

- Window Sashes: The plan seems to indicate that no Historic Sashes were removed only non-historic; however, I was told at the time that historic sashes were removed because there was no money in the budget to restore the historic sashes. I would like evidence that no Historic Sashes were removed. Also, the plan indicates that some of the sashes installed in the house in the 1990s should be kept. I disagree. They are not the proper dimensions and fit loosely in the window frames besides the fact that they are cheap, finger jointed sashes that have no longevity.

Response: To date, no information has been found regarding which window sashes were replaced in the 1990s rehabilitation effort. A view has been expressed that some of the windows now in the house are original to the period of significance. The Preservation Plan provides for an inventory and close-in examinations of all windows before any windows are replaced. Because a primary focus of the Preservation Plan is to stem ongoing damage in order to preserve the overall property, all non-original windows will be replaced with historically appropriate windows. Any leaking or poorly performing original windows will be repaired.

- Roof Materials: According to Clara Knight, the house had wooden shingles on it when they purchased the house in the 1960s. Thus, when the roof is replaced it should look as if it has wooden shingles even if the material is not wood.

Response: The Corps, in consultation with the West Virginia Division of Culture and History (WVDCH), will choose a roofing material that most accurately projects the texture, color, and appearance of wood shingles typical of the period of significance as discussed in the Preservation Plan.

- Electric & Mechanical Systems: The plan does not give enough detail on how new electric and mechanical systems will be installed and it does not say if the existing electric conduit on the walls will be removed.

Response: The Preservation Plan summarizes findings of the Corps' Electrical Engineer Assessment of the Jenkins utilities, conducted August 2007. This survey identifies areas for action. Details concerning electrical elements needing replacement/repair are to be developed during the preparation of construction documents for preservation.

- Wood features: The research on the wood features of the house was poorly done. For example, the plan dates a 1830s mantel as 1930 and does not recognize it as being added in the 1990s. I would have thought the Corps had photographs of the Historic House when it began work and the mantel would not have been in them. Records of the 1990s work done on the house by the DNR do not seem to exist either. Also, the preservation of the floors is not listed as a need.

Response: It has been clarified that the current mantel surround depicted in this figure was installed in the 1990s to replace a 1930s fireplace that had earlier replaced the original. It should be noted, however, that this fireplace surround is not appropriate to the Jenkins House due to its incompatible scale, proportioning, styling, and overall lack of adherence to the Federal style program reflected in original mantels found in the house. See change in Preservation Plan.

The need to identify original trim and detailing for use as templates in future restoration is discussed in the plan. The intent of 5.3 was that details such as original trim, and features such as hardware and shutters should be identified and recorded for future restoration work. Wood flooring has been added; see change in Preservation Plan. Restoration of wood features will be considered in the restoration phase of the project authorized by WRDA 2007.

I am sure this is not what you wanted to hear, but if the Corps had listened to comments and concerns in the past, a lot of this could have been avoided. For example, the Corps would have chosen a time to do water/moisture tests during normal conditions instead of draining the front yard and waiting for the lawn to dry up, taking the tests, and hoping we didn't notice. It takes me back to the time the DNR/Corps turned the house over to Culture & History when it was in deplorable condition, and later tried to argue it was in good shape. Of course, no one thought we had the good sense to document the condition, but we did. No one seemed to think those of us who attended the first public meetings would remember there was no planned wetlands in the front yard much less keep a copy of the plan, but we did. It would just be wonderful, if for

once, we were treated with respect and given credit for our knowledge and experience instead of treated like dump folks who you can pull the wool over their eyes.

Please do not take anything I said personally because my comments are addressed to an entity, the Corps. I feel I have earned the right to be honest. If you have any questions, you can call us at the above telephone number.

Sincerely,

Karen N. Nance Johnny G Nance

Cc: WV SHPO
Congressman Rahall

AGENCY RESPONSES TO HANDWRITTEN COMENTS

Table G.1 Summary of Handwritten Comments Concerning Draft EA and Agency Responses.

	Comment	Agency Response
1	LeGrand: Public visitation should not be removed during preservation activities. Accurate preservation needs to be performed, agency should be mindful to keep plantation and museum open for public visitation at all times for tourism to Cabell County and West Virginia.	In the interest of public safety and contractor and house security, the Jenkins House will be closed to the public during preservation construction activities. Public visitation and WVDCH sponsored programming events will be temporarily unavailable during construction. However, alternative programming and interpretive means may be available to the public. WVDCH is currently exploring options. WVDCH will hold a public ceremony to commemorate initiation of preservation activities and construction progress updates will be available on-line.
2	Howard: The meeting covered most of the needed repairs; house could be good tourist attraction; life-long resident of area only became aware of Jenkins House in past 9-10 years.	Noted.
3	Coleman: Delighted that important historical asset will be restored; foresees future historical events.	Noted.
4	Adkins: Scoping comment (e-mail) was not included in DEA.	It was an unintentional oversight to omit Adkins comments (see attached e-mail response for details). Adkins e-mail comments are included in the Final EA.
5	Ned Jones:. typo on page 25 of Scoping Meeting Transcript, statement should read “black” experience instead of “pike” experience.	Noted.

REFERENCES CITED IN AGENCY RESPONSES TO PUBLIC COMENTS

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2006 Historic Structure Report, General Albert Gallatin Jenkins House, Green Bottom, Cabell County, West Virginia. Report prepared for West Virginia State University and U.S. Army Corps of Engineers, Huntington District. GAI Project No. C050511.10, July 17, 2006.

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2001 Archaeological Testing, Albert Gallatin Jenkins House at Greenbottom, Cabell County, West Virginia. Interim Letter Report prepared for U.S. Army Corps of Engineers, Huntington District. Cultural Resource Analysts, Inc., Contract Publication Series WV01-82), July 27, 2001

U.S. Army Corps of Engineers
1981 Gallipolis Lock and Dam Replacement, Phase 1, Advanced Engineering and Design Study, General Design Memorandum, Main Report and Environmental Impact Statement. Huntington District, Huntington, West Virginia.

2007 Evaluation of Potential Effects of Wetlands and Groundwater on the Jenkins House, Robert C. Byrd Locks and Dam, Green Bottom Mitigation Site, Lesage, West Virginia. USACE, Huntington District, Soils Engineering Section.

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1980 Planning Aid Report; Gallipolis Lock and Dam Replacement Study. Prepared for: U.S. Army Corps of Engineers, Huntington District, Huntington, West Virginia. Prepared by: U.S. Fish and Wildlife Service, Ecological Services, Elkins, West Virginia, May 1980.

Appendix H

Relevant Water Resource Development Act (WRDA) Language

WRDA 1986
The Robert C. Byrd Dam Replacement Project was authorized by §301(a) of the Water Resources Development Act of 1986 (P.L. 99-662) as follows:

§301 AUTHORIZATION OF PROJECTS

(a) AUTHORIZATION OF CONSTRUCTION – The following works of improvement for the benefit of navigation are authorized to be prosecuted by the Secretary substantially in accordance with the plans and subject to the conditions recommended in the respective reports designated in this subsection, except as otherwise provided in this subsection:

* * *

GALLIPOLIS LOCKS AND DAM REPLACEMENT, OHIO RIVER, OHIO AND WEST VIRGINIA - The project for navigation, Gallipolis Locks and Dam Replacement, Ohio River, Ohio and West Virginia: Report of the Chief of Engineers, date April 8, 1982, and Supplemental Report of the Chief of Engineers, dated August 13, 1983, at a total cost of $285,000,000, with a first Federal cost of $285,000,000.

WRDA 1988
Section 30 of the Water Resources Development Act of 1988 (P.L. 100-676); no funds were attached to this directive:

§ 30 LESAGE/GREENBOTTOM SWAMP, WEST VIRGINIA

(a) LIMITATION ON LAND CONVEYANCE. - The Secretary shall not convey title to all or any part of the LeSage/Greenbottom Swamp to the State of West Virginia.

(b) LESAGE/GREENBOTTOM SWAMP DEFINED. - For purposes of this section, the term "LeSage/Greenbottom Swamp" means the land location in Cabell and Mason Counties, West Virginia, acquired or to be acquired by the United States for fish and wildlife mitigation purposes in connection with the Gallipolis Locks and Dam replacement project authorized by section 301(a) of the Water Resources Development Act of 1986 (100 Stat. 4110).

(c) LIMITATION ON STATUTORY CONSTRUCTION. - Nothing in this section shall be construed as affecting the authority of the Secretary to carry out the Gallipolis Locks and Dam replacement project authorized by section 301(a) of the Water Resources Development Act of 1986 (100 Stat. 4110).

WRDA 2000
Section 548 of the Water Resources Development Act of 2000 (P.L. 106-541) amended §30, WRDA 1988 to include a new sub-section:

(d) HISTORIC STRUCTURE. - The Secretary shall ensure the preservation and restoration of the structure known as the "Jenkins House" located within the LeSage/Greenbottom Swamp in accordance with standards for sites listed on the National Register of Historic Places."

WRDA 2007

§. 3169. LESAGE/GREENBOTTOM SWAMP, WEST VIRGINIA.

Section 30(d) of the Water Resources Development Act of 1988 (102 Stat. 4030; 114 Stat. 2678) is amended to read as follows:

‘‘(d) HISTORIC STRUCTURE.—The Secretary shall ensure the preservation and restoration of the structure known as the ‘Jenkins House’ and the reconstruction of associated buildings and landscape features of such structure located within the Lesage/Greenbottom Swamp in accordance with the standards of the Department of the Interior for the treatment of historic properties. Amounts made available for expenditure for the project authorized by section 301(a) of the Water Resources Development Act of 1986 (100 Stat. 4110) shall be available for the purposes of this subsection.’’

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Appendix I

Secretary of Interior's Standards for the Treatment of Historic Properties

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owner in the Historic Preservation Certification Application, Request for Certification of Completed Work (NPS Form 10–168c), as follows:

Fee	Size of rehabilitation
$500	$20,000 to $99,999
$800	$100,000 to $499,999
$1,500	$500,000 to $999,999
$2,500	$1,000,000 or more

If review of a proposed or ongoing rehabilitation project had been undertaken by the Secretary prior to submission of Request for Certification of Completed Work, the initial fee of $250 will be deducted from these fees. No fee will be charged for rehabilitations under $20,000.

(d) In general, each rehabilitation of a separate certified historic structure will be considered a separate project for purposes of computing the size of the fee.

(1) In the case of a rehabilitation project which includes more than one certified historic structure where the structures are judged by the Secretary to have been functionally related historically to serve an overall purpose, the fee for preliminary review is $250 and the fee for final review is computed on the basis of the total rehabilitation costs.

(2) In the case of multiple building projects where there is no historic functional relationship amont the structures and which are under the same ownership; are located in the same historic district; are adjacent or contiguous; are of the same architectural type (*e.g.*, rowhouses, loft buildings, commercial buildings); and are submitted by the owner for review at the same time, the fee for preliminary review is $250 per structure to a maximum of $2,500 and the fee for final review is computed on the basis of the total rehabilitation costs of the entire multiple building project to a maximum of $2,500. If the $2,500 maximum fee was paid at the time of review of the proposed or ongoing rehabilitation project, no further fee will be charged for review of a Request for Certification of Completed Work.

PART 68—THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

Sec.

AUTHORITY: The National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 *et seq.*); sec. 2124 of the Tax Reform Act of 1976, 90 Stat. 1918; EO 11593, 3 CFR part 75 (1971); sec. 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262).

SOURCE: 60 FR 35843, July 12, 1995, unless otherwise noted.

§ 68.1 Intent.

The intent of this part is to set forth standards for the treatment of historic properties containing standards for preservation, rehabilitation, restoration and reconstruction. These standards apply to all proposed grant-in-aid development projects assisted through the National Historic Preservation Fund. 36 CFR part 67 focuses on "certified historic structures" as defined by the IRS Code of 1986. Those regulations are used in the Preservation Tax Incentives Program. 36 CFR part 67 should continue to be used when property owners are seeking certification for Federal tax benefits.

§ 68.2 Definitions.

The standards for the treatment of historic properties will be used by the National Park Service and State historic preservation officers and their staff members in planning, undertaking and supervising grant-assisted projects for preservation, rehabilitation, restoration and reconstruction. For the purposes of this part:

(a) *Preservation* means the act or process of applying measures necessary to sustain the existing form, integrity and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of

mechanical, electrical and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

(b) *Rehabilitation* means the act or process of making possible an efficient compatible use for a property through repair, alterations and additions while preserving those portions or features that convey its historical, cultural or architectural values.

(c) *Restoration* means the act or process of accurately depicting the form, features and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

(d) *Reconstruction* means the act or process of depicting, by means of new construction, the form, features and detailing of a non-surviving site, landscape, building, structure or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

§ 68.3 Standards.

One set of standards—preservation, rehabilitation, restoration or reconstruction—will apply to a property undergoing treatment, depending upon the property's significance, existing physical condition, the extent of documentation available and interpretive goals, when applicable. The standards will be applied taking into consideration the economic and technical feasibility of each project.

(a) *Preservation*. (1) A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.

(2) The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

(3) Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.

(4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.

(5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

(6) The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color and texture.

(7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

(8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

(b) *Rehabilitation*. (1) A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

(2) The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

(3) Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

(4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.

(5) Distinctive materials, features, finishes and construction techniques or

examples of craftsmanship that characterize a property will be preserved.

(6) Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

(7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

(8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

(9) New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

(10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

(c) *Restoration.* (1) A property will be used as it was historically or be given a new use that interprets the property and its restoration period.

(2) Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces and spatial relationships that characterize the period will not be undertaken.

(3) Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.

(4) Materials, features, spaces and finishes that characterize other historical periods will be documented prior to their alteration or removal.

(5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.

(6) Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials.

(7) Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.

(8) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

(9) Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

(10) Designs that were never executed historically will not be constructed.

(d) *Reconstruction.* (1) Reconstruction will be used to depict vanished or nonsurviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property.

(2) Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts that are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

(3) Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.

(4) Reconstruction will be based on the accurate duplication of historic

features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.

(5) A reconstruction will be clearly identified as a contemporary re-creation.

(6) Designs that were never executed historically will not be constructed.

PART 71—RECREATION FEES

Sec.

AUTHORITY: Sec. 4, Land and Water Conservation Fund Act of 1965 (16 U.S.C.A. 4601–6a (Supp., 1974)), as amended by Pub. L. 93–303; and sec. 3, Act of July 11, 1972, 86 Stat. 461; sec. 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262).

SOURCE: 39 FR 33217, Sept. 16, 1974. Redesignated at 44 FR 7143, Feb. 6, 1979, and 46 FR 34329, July 1, 1981; correctly redesignated at 46 FR 43045, Aug. 26, 1981, unless otherwise noted.

§ 71.1 Application.

This part is promulgated pursuant to section 4, Land and Water Conservation Fund Act of 1965, 16 U.S.C.A. 4601–6a (Supp., 1974), and section 3, Act of July 11, 1972, 86 Stat. 461. Any Federal recreation fee charged by any bureau of the Department of the Interior shall be charged according to criteria set forth in this part.

§ 71.2 Types of Federal recreation fees.

There shall be three types of Federal recreation fees:

(a) Entrance fees, charged either on an annual or single-visit basis, for admission to any Designated Entrance Fee Area;

(b) Daily recreation use fees for the use of specialized sites, facilities, equipment or services furnished at Federal expense; and

(c) Special recreation permit fees for specialized recreation uses, such as, but not limited to, group activities, recreation events, and the use of motorized recreation vehicles.

§ 71.3 Designation.

(a) An area or closely related group of areas shall be designated as an area at which entrance fees shall be charged (hereinafter "Designated Entrance Fee Area") if the following conditions are found to exist concurrently:

(1) The area is a unit of the National Park System administered by the Department of the Interior;

(2) The area is administered primarily for scenic, scientific, historical, cultural, or recreation purposes;

(3) The area has recreation facilities or services provided at Federal expense; and

(4) The nature of the area is such that entrance fee collection is administratively and economically practical.

(b) Any specialized site, facility, equipment or service related to outdoor recreation (hereinafter "facility") shall be designated as a facility for which a recreation use fee shall be charged (hereinafter "Designated Recreation Use Facility") if:

(1) For each Designated Recreation Use Facility, at least one of the following criteria is satisfied:

(i) A substantial Federal investment has been made in the facility,

(ii) The facility requires regular maintenance,

(iii) The facility is characterized by the presence of personnel, or

(iv) The facility is utilized for the personal benefit of the user for a fixed period of time; and,

(2) For each Designated Recreation Use Facility, all of the following criteria are satisfied: