



Congress of the United States

House of Representatives

Washington, DC 20515

July 12, 2016

The Honorable Sally Jewell
Secretary
United States Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Jewell:


The Castillo de San Marcos is the oldest masonry fort in the continental United States. Completed in 1695, the Fort has been a part of our nation's heritage and history for over 300 years. The Castillo de San Marcos National Monument is truly a national treasure, attracting over 1.3 million visitors in 2014. This treasure, however, has been struggling to keep pace with the growing number of visitors that pass through its doors each year.

In 2004, the Castillo de San Marcos National Monument Boundary Adjustment Act (Public Law 108-480) passed Congress by unanimous consent and was signed into law. Passage of this legislation demonstrates the importance of a visitor center at the monument. Since then, the Department of the Interior and National Park Service have completed extensive and necessary studies and mandatory reviews required to develop preliminary plans. Significant public expenditures have been directed to bring the project to its current stage.

We urge the Department of the Interior and National Park Service to assist by any means available to help this pending project move forward. Whether it is through established programs or new initiatives, we encourage your office to devote the time, resources and attention towards its successful completion. One source of funding could be the Centennial Challenge Program, which provides Department of the Interior resources to match privately raised dollars that will go towards the renovation of projects such as National Park Service Visitor Centers.

We ask that completion of the Castillo project be given every consideration as we consider 2016-17 priorities.

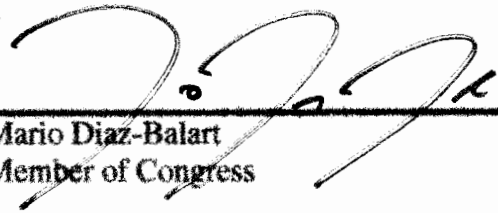
Respectfully,


John L. Mica
Member of Congress


Bill Nelson
United States Senator



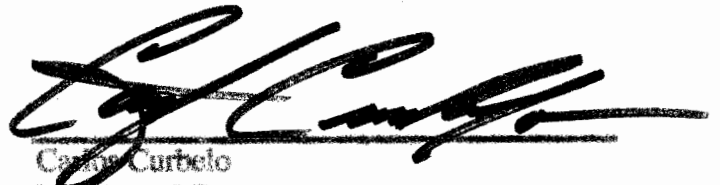
Ron DeSantis
Member of Congress



Mario Diaz-Balart
Member of Congress



Rich Nugent
Member of Congress



Carlos Curbelo
Member of Congress



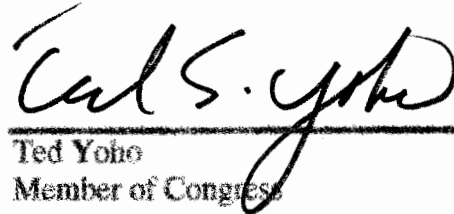
Heana Ros-Lehtinen
Member of Congress



Gus Bilirakis
Member of Congress



Bill Posey
Member of Congress



Ted Yoho
Member of Congress



Jeff Miller
Member of Congress



United States Department of the Interior



IN REPLY REFER TO:
5.D. (SERO-RD)

NATIONAL PARK SERVICE
Southeast Regional Office
Atlanta Federal Center
1924 Building
100 Alabama St., SW.
Atlanta, Georgia 30303

AUG 11 2016

The Honorable Ron DeSantis
House of Representatives
308 Cannon House Office Building
Washington, DC 20515

Dear Congressman DeSantis:

Thank you for your letter of July 12, 2016, concerning the establishment of a visitor center at Castillo de San Marcos National Monument. I have been asked to respond on behalf of the Secretary.

We agree that Castillo de San Marcos National Monument is of great national importance as it is not only a structure of stone and mortar, but also a symbol of human determination and endurance.

Although the National Park Service recognizes the value that a visitor center may bring to Castillo de San Marcos and its visitors; funding limitations and critical infrastructure needs are prevalent across the Service. As a result, we remain committed to prioritizing funding to target the stabilization and restoration of existing assets over the construction of new facilities, in order to address the \$11.9 billion deferred maintenance backlog. While the Centennial Challenge Program provides an alternative to the traditional funding model available for infrastructure needs, Castillo de San Marcos does not currently have a partner committed to providing the required non-federal matching donation in support of this project.

We remain committed to working with Congress to ensure that all available options are explored in working to accomplish our mutual goals. Thank you for your continued support of Castillo de San Marcos National Monument and the National Park Service.

Sincerely,

Stan Austin
Regional Director



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

SEP 30 2016

IN REPLY REFER TO:

Honorable Ron DeSantis
House of Representatives
Washington, DC 20515

Dear Representative DeSantis:

Thank you for your July 12, 2016, letter to Secretary Sally Jewell, cosigned by several of your colleagues, expressing your support for moving forward with building a visitor center at Castillo de San Marcos National Monument. Secretary Jewell asked me to respond.

The Department recognizes the value that a visitor center would provide to Castillo de San Marcos National Monument and its visitors. We also are aware of the investment that was made several years ago in developing preliminary plans for a visitor center there. However, the National Park Service faces an \$11.9 billion deferred maintenance backlog, including many critical infrastructure needs, in parks across the nation. Given the limited amount of construction and maintenance funding available, the National Park Service is prioritizing the stabilization and restoration of existing assets over the construction of new facilities.

The Centennial Challenge program, as your letter noted, could potentially provide a source of funding for the proposed visitor center. However, Centennial Challenge funding may only be used for projects where a non-federal partner provides matching funds of at least 50 percent. We understand that Castillo de San Marcos National Monument does not currently have a partner committed to providing the required donation in support of this project.

We are committed to continuing to work with you to explore options for improving the accommodation of visitors to Castillo de San Marcos National Monument. We appreciate your support for the national monument, and for the National Park Service.

A similar response is being sent to the cosigners of your letter.

Sincerely,

Michael Bean
Principal Deputy Assistant Secretary
for Fish and Wildlife and Parks

Congress of the United States
Washington, DC 20515

July 31, 2014

The Honorable Sally Jewell
Secretary
United States Department of Interior
Mail Stop 6242
1849 C Street, N.W.
Washington, D.C. 20240

The Honorable Penny Pritzker
Secretary
United States Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Secretaries Jewell and Pritzker:

We write today to express our concerns over the proposed Endangered Species Act (ESA) listing of several species of non-native sturgeon, specifically its failure to exempt farmed fish and aquaculture-based populations and products.

The United States is a leader in raising and commercializing the production of sturgeon through land-based, closed-system, sustainable and environmentally sound aquaculture techniques. Florida's burgeoning industry, which includes three commercial-scale sturgeon farms and a fourth one in the planning stage, creates much needed jobs and promotes economic development.

All of Florida's sturgeon farms are or will be culturing non-native species of sturgeon, several of which are slated for inclusion under the proposed rule – Russian (*Acipenser gueldenstaedtii*), stellate (*Acipenser stellatus*) and Siberian (*Acipenser baerii*). Without an exemption for farmed fish and aquaculture-based populations and products, this listing will have a devastating impact on the burgeoning sturgeon aquaculture industry in our state. As our nation's aquaculture industry is not dependent on wild fish for species currently being farmed, the proposed listing will likely have a negligible impact on efforts to protect wild stocks. Additionally, strong protections governing the global trade in sturgeon are already in place under the Convention on International Trade in Endangered Species (CITES).

Sturgeon aquaculture also benefits conservation, providing a viable marketplace alternative to the harvesting of wild stocks and thereby reducing fishing pressures on both legal and illegal fisheries. In addition, sturgeon aquaculture allows the academic communities to research topics such as physiology, nutrition, pathology and endocrinology, without disturbing or risking harm to threatened and endangered wild stocks. Among those academic institutions are several in our home state, including the University of Florida, the University of South Florida, the University of Miami, and the Mote Marine Laboratory.

For these reasons, we urge you to reject any effort to list these species under the Endangered Species Act without first providing a workable exclusion to allow the continued trade in farmed

fish and aquaculture-based populations and products, consistent with the goals of the Act and protections already provided under CITES.

Thank you for your consideration of this request.

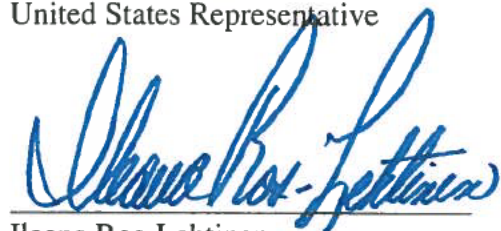
Sincerely,




Steve Southerland, II
United States Representative



Mario Diaz-Balart
United States Representative



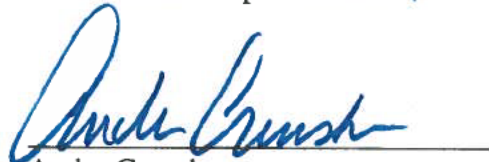
Ileana Ros-Lehtinen
United States Representative



Thomas J. Rooney
United States Representative



Gus M. Bilirakis
United States Representative



Ander Crenshaw
United States Representative



Ron D. DeSantis
United States Representative



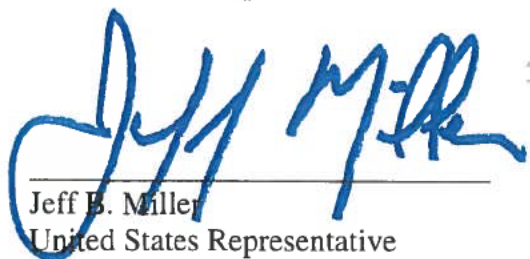
Ted S. Yoho, DVM
United States Representative



Dennis A. Ross
United States Representative



Daniel A. Webster
United States Representative



Jeff B. Miller
United States Representative



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



AUG 19 2014

The Honorable Ron D. DeSantis
House of Representatives
Washington, D.C. 20515

Dear Representative DeSantis:

Thank you for your letter of July 31, 2014, to Secretary of the Interior Jewel and Secretary of Commerce Prizker regarding the potential Endangered Species Act (ESA) listing of several species of sturgeon not native to the United States, including the Russian (*Acipenser gueldenstaedtii*), stellate (*Acipenser stellatus*) and Siberian (*Acipenser baerii*) sturgeon. The U.S. Fish and Wildlife Service (Service) is currently conducting the 12-month status review of ten sturgeon species that we were petitioned to list under the ESA, including the three mentioned in your letter.

The Service is collecting and evaluating information on the sturgeon and has not made a determination regarding the listing of these species. Our listing determination will be made on the best scientific and commercial information available. At any time during our status review, the aquaculture community may provide us with information that will help us in making this determination. Once the status review is completed, and should the Service find that listing is warranted, the Service will prepare a proposed rule. At that point, the public will be given 60 days to comment on the proposed listing. This will give the aquaculture community another opportunity to provide the Service with information.

As noted in your letter, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) was created to ensure that international trade in animals and plants does not threaten their survival in the wild. Permits may be issued for the movement of caviar into or out of the United States for commercial use of CITES Appendix II listed species. In addition, the Services have the flexibility under the ESA for threatened species to allow imports and exports of caviar. However, such activities must also meet any requirements set forth by the U.S. Department of Agriculture and the Food and Drug Administration.

For species listed as endangered, the ESA provides a stringent regulatory setting when it comes to commercial activities. In particular, section 9(a)(1)(E) makes it illegal for any person subject to the jurisdiction of the United States to deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever and in the course of a commercial activity, any endangered species of wildlife. Our authority to provide exemptions to these prohibitions is quite narrow and generally must enhance the propagation or survival of the affected species as provided in section 10(a)(1)(A).


However, the ESA provides more flexibility to manage species listed as threatened, provided that the management is consistent with their long-term conservation. Section 4(d) of the ESA allows the Fish and Wildlife Service to implement special regulations for threatened species that tailor

the take prohibitions of the ESA to those necessary and advisable for the conservation of the species. While such special regulations cannot be developed for endangered species, section 4(d) special regulations can provide important flexibility to address a variety of activities affecting species listed as threatened.

While we have not yet determined whether any of these sturgeon species under our jurisdiction warrant listing under the ESA, we appreciate the concern of the aquaculture community and would welcome any information they can provide to help us understand the status of these species and threats to their continued existence in the wild. If we do ultimately find it necessary to propose listing any of these species as threatened under the ESA, we would welcome the opportunity to work with the aquaculture community to explore section 4(d) special rules that might allow for certain commercial use consistent with the conservation of the species.

We appreciate your concerns regarding the ESA and the aquaculture industry. If you or your constituents have any further questions, please do not hesitate to contact me at 202-208-4646 or Janine Van Norman, chief of our Branch of Foreign Species, at 703-358-2370.

Sincerely,


Gary Frazer
Assistant Director for
Ecological Services

RON DeSANTIS
6TH DISTRICT, FLORIDA

COMMITTEE ON FOREIGN AFFAIRS
COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM
COMMITTEE ON THE JUDICIARY

Congress of the United States
House of Representatives
Washington, DC 20515-0906
638631

427 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
T: (202) 225-2706

1000 CITY CENTER CIRCLE
SECOND FLOOR
PORT ORANGE, FL 32129
T: (386) 756-9798

RECEIVED

2013 NOV 12 AM 12:00

OFFICE OF THE
EXECUTIVE SECRETARIAT

October 30, 2013

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Jewell:

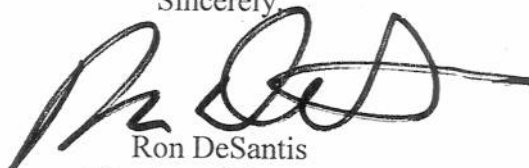
I am writing to seek your assistance in the University of Florida's (UF) effort to gain recognition of the national significance of the crown jewel of the 38 state-owned historic properties in St. Augustine for which UF has been assigned stewardship by the Florida Legislature in 2007.

This crown jewel is Government House and the site it occupies. This site has served important governmental functions ever since the first Spanish governor made it his capitol in 1572. A succession of Spanish, British and United States buildings have followed, and today's Government House is an important 1935-1937 New Deal structure in which the architect reused coquina walls dating to the 17th and 18th centuries.

As the United States approaches the 450th anniversary of its first European settlement, St. Augustine, the Florida Museum of Natural History has installed in Government House an exhibit titled "First Colony," which had its grand opening only last week and to great critical acclaim. After 2015, this exhibit will tour our country and will introduce a broader and diverse audience to our Spanish roots.

Designation of this site and Government House as a National Historic Landmark should be a focal point of the 450th Commemoration in 2015 and it is my hope that you will come to St. Augustine to make that proclamation.

Sincerely,



Ron DeSantis
Member of Congress



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, DC 20240

H34(2280)

NOV 22 2013

The Honorable Ron DeSantis
House of Representatives
Washington, D.C. 20515

Dear Mr. DeSantis:

Thank you for your October 30, 2013, letter regarding the historical importance of Government House in St. Augustine, Florida. Working under the auspices of the Office of the Supervising Architect of the Treasury, Jacksonville architect Mellen C. Greeley designed the building, which was constructed in 1935-37 as a United States Post Office and Customhouse. Staff from the National Historic Landmarks (NHL) Program and the National Register (NR) of Historic Places in both the Washington and Southeast Regional offices have had the opportunity to review documentation recently submitted on Government House and have concluded that the building, individually, does not meet program requirements for consideration as a NHL or for listing in the NR at the national level of significance. An earlier report prepared by the National Park Service, Southeast Region in May 1966 recommending the transfer of Government House from federal ownership to the State of Florida concluded that the building was “found to be suitable, desirable and adaptable for *state* historic monument purposes.”

The conclusions regarding the individual national significance of Government House are in no way reflective of the national significance of St. Augustine to the history of the United States. The St. Augustine Town Plan District was designated a NHL in 1970 and the nomination for this district is currently being expanded and updated. Five properties in St. Augustine have been individually designated as NHLs: the Cathedral of St. Augustine, the Gonzalez-Alvarez House, the Llambias House, all in 1970; the Fort Mose Site in 1994; and the Hotel Ponce de Leon in 2006. Additionally, the Castillo de San Marcos has been long recognized for its historical importance to the nation. It was declared a National Monument in 1924, came under National Park Service administration in 1933, and was listed in the NR at its inception in 1966. A number of other properties within St. Augustine have also been listed in the NR at the national level of significance for both the city’s Spanish colonial history as well as its late-nineteenth-century development as a tourist destination by Henry Flagler.

For your convenience, we have attached the recent NHL and NR evaluations of Government House. The NHL and NR staff have been in communication with the Florida Division of Historic Resources (State Historic Preservation Office) and the state cultural resource staff concur with the findings of NHL and NR programs. Should you have any additional questions or need further clarification, please contact J. Paul Loether, Chief of the National Register of

Historic Places and the National Historic Landmarks Program, by email
(Paul_Loether@nps.gov) or by phone (202-354-2003).

Sincerely,

A handwritten signature in black ink that reads "Stephanie Toothman". The signature is written in a cursive, flowing style.

Stephanie Toothman, Ph.D.
Associate Director, Cultural Resources, Partnerships,
and Science

Enclosure



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, DC 20240

H34(2280)

MAY - 3 2013

Antoinette J. Lee, Ph.D.

Non-Responsive

Dear Toni:

Thank you for your inquiry about the potential of Government House in St. Augustine, Florida, to be considered for National Historic Landmark (NHL) status. The Office of the Supervising Architect of the Treasury hired Jacksonville architect Mellen C. Greeley to design the building, which was completed in 1937. Buildings on this site have served government functions since the colonial period and Greeley incorporated materials from surviving coquina walls into his design for a modern post office facility. We have considered the property's significance under Criterion 1 and Criterion 4 as an early work of restoration as conducted by the Federal government and within the development of the historic preservation movement in the United States. After careful examination and evaluation, we have determined that the property does not meet the requirements for NHL consideration and we cannot encourage the preparation of a nomination.

Although it is difficult to view Government House as an example of a "restoration," this term was applied to the project at the time of conception and realization, and the evolution of "bricks-and-mortar" preservation is an important theme in the history of historic preservation. The building does not appear to be a restoration, but rather is a modern design that selectively includes some (the gabled end wall and balcony), but not all (the tall courtyard walls, tower, and classical portal) of the features visible in a 1764 view capturing the east elevation of the building. The design may have used existing coquina walls, or reused wall materials on the first floor of what became one wing of the new building. The footprint of the building existing on the site at the outset of design and construction was fully absorbed into the new one. This contrasts with the wholesale reconstruction of the Governor's Palace and Capitol in Williamsburg between 1928 and 1934. These buildings are also twentieth-century interpretations of the colonial past; however, the purpose of the project was distinct, the level of investigation highly intensive, and the outcomes very different. Unlike Government House, the major buildings at Williamsburg were recreated as museum pieces. Towards this end, the architects at Williamsburg conducted in-depth research, and on-site archeology of below-ground resources, and architectural fieldwork in an attempt to reconstruct, as accurately as possible for the time, the Governor's Palace and Capitol as depicted on the Bodleian Plate (ca. 1740). With the new post office in St. Augustine, knowledge of Spanish colonial architecture—including an eighteenth-century view of a predecessor building

on the site—was used as inspiration, as the launching point for the design of a modern building that would be compatible with the “living” historic city in which it was located.

The documentation acknowledges that the term “restoration” was used differently in the 1930s than today, but does not elaborate on this key topic. Overall, the project seems to be more related to contemporary design processes involved in devising new buildings that reference local architectural precedents than a restoration or reconstruction of a specific building. Furthermore, the assertion that Government House can be considered a restoration does not include an in-depth consideration of how people in the 1930s defined and utilized this term. Such an approach would require a difficultly researched and deeply nuanced analysis of the concept of “seeing” relative to historic buildings.

If contemporaries truly viewed Government House as a restoration, or even an inventive reconstruction, in the manner that terms are defined today, what kind of mental gymnastics were in play? What were the boundaries for something understood to be a restoration versus a new design that might broadly be categorized as (Spanish) Colonial Revival? How did they reconcile the dramatic differences between the building of 1935-37; its immediate predecessor—an amalgam of different periods of construction and alteration; and the historic watercolor (1764) that “was adopted the key-note of the restoration”? Did they see, for example, differences between the work done in recreating Williamsburg’s Governor’s Palace and Capitol and the project that created Government House?

As it stands, it is hard to know from the submitted documentation what parts of the building, exactly, survived into the early 1930s, when these parts were originally built or significantly altered, and what fabric was ultimately incorporated into the new post office building. There is no clear account of the building’s construction and evolution over time. The documentation seems to suggest that perhaps more than restoration Government House was the first example of a federally-funded adaptive reuse project. The degree to which the, at best, use of three walls in an otherwise modern building could be considered adaptive reuse is questionable, as is the importance of a one-off project, an anomaly within the Office of the Supervising Architect of the Treasury.

The Supervising Architect’s Office was, in effect, one of the most important architecture “firms” operating in the country during the second half of the nineteenth century and the first half of the twentieth century. As you have demonstrated in your own publication, the office was incontestably engaged in nationally-significant work whether considering the office’s historical role or the architectural significance of some of its designs. The Supervising Architect’s Office was responsible for the design and construction of new buildings for federal functions in historic towns and urban neighborhoods across the country and Government House fits well within that context. The office’s reuse of wall remnants in the construction of a new post office in St. Augustine in 1935-37 does not reposition it as a “type specimen valuable for the study of early restoration architecture by the Federal government in the United States.”

While clearly situated within the popular and professional dialogue in the 1930s about historic buildings and sites, decisions made about the design of Government House seem to be better categorized as something more of a fanciful contextualization. The formal and stylistic choices

made by Mellen Greeley in conjunction with the Supervising Architect's Office do not seem dissimilar to the deliberation that would have occurred each time the office planned a post office or some other government building in a historic town and or neighborhood.

The design process for Government House was also not unique to the Supervising Architect's Office. At the same time that work was proceeding with Government House, the National Park Service (NPS) was undertaking a project with a similar goal. Typical of NPS practice at the time, the design of the headquarters building at Fort Matanzas (1935-36) purposefully mimicked local architecture with its use of coquina and wood-framing. Considering the emphasis that the nomination places on the role of the Federal government in the restoration project, it would have been helpful to place the property within context of the development of the Federal government's role in preservation—particularly the Antiquities Act (1906) and the effort to preserve Native American ruins (Casa Grande and Mesa Verde); formation of the NPS and early historical parks (Colonial); the creation of HABS (1933); and passage of the Historic Sites Act of 1935.

St. Augustine's larger role in the historic preservation movement is an important one and remains much understudied. The nomination understandably focuses much attention on Williamsburg, but does not provide a clear structure for the movement's history, particularly events related to the Federal government's role in preservation as well as the efforts of other "living cities," such as Charleston, New Orleans, Savannah, San Antonio, and Alexandria. Moreover, the argument in the submitted documentation focuses more on the importance of St. Augustine to historic preservation as a district. We feel that a district nomination—or an expansion to the present one currently being revised—could more fully and satisfyingly demonstrate St. Augustine's national significance than a single property built in 1935-37. A district nomination would take into account the complex narrative of historic preservation in all its facets, including: archeology, public history, architecture—reconstructed and restored as well as new designs like the post office, and the ever-important element of commerce and historical tourism in a city that by the 1930s had long been established as a resort community.

Thank you for your patience while we reviewed the relative merits of the property as well as the information contained in the draft you submitted. Please keep in mind that the NHL Program does not recommend the preparation of documentation prior to us making an official response about the potential of a property to be considered for NHL status. The steps of the process exist to avoid misdirecting resources and energies by both the property owner and the preparer, which we are particularly sensitive to at a time when the national economy remains fragile. If you would like to discuss this review further, please contact James Jacobs by phone (202-354-2184) or email (james_jacobs@nps.gov). We look forward to working with you on other projects in the future.

Sincerely,



Alexandra Lord, Ph.D.
Branch Chief
National Historic Landmarks Program

cc: Florida SHPO, attn: Barbara Mattick, Ph.D.

bcc: SERO-Turkiya Lowe, Cynthia Walton
2280 Lord, Loether, Gabbert
Basic File Retained In 2280

FNP:JJacobs:OP:05/02/2013:S://nr-nhl/Jacobs/Government House



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

The United States Department of the Interior National Park Service

National Register of Historic Places Evaluation/Return Sheet

Property Name: Government House (Florida's New Deal Resources MPS)
St. Johns County, FL

Reference Number: 13000812

Reason for Return

This nomination is being returned for substantive revision

The nomination for the Government House is under the umbrella of the Florida's New Deal Resources Multiple Property Submission, citing Criteria A and C at the local and national levels of significance. While we believe that this property, which is a contributing resource in the St. Augustine Town Plan Historic District, has individual importance and meets the registration requirements of the MPS, we do not believe that the property warrants listing at the national level of significance as presented in the nomination.

The claim of national significance lies in the fact that the work on the Government House was "the first," or "the only," or was a "unique" example of the Federal government "restoring" a building for Federal government purposes, and that the experience of this particular project had an influence in the later development of the Federal preservation program, laws, and policies.

As you are aware, claims of being the "first," and especially "only" example of something does not, in and of itself, equate with significance. In fact, being a "unique example" or "the only example" of something can be the basis for an argument *against* significance. And that is the case here. The nomination takes great pains to point out that this was the first time the Treasury Department restored (in the terminology of the day) a historic building for use as a Federal building, and that for many years it was the only such example.

Government House

The restoration of this building was not a result of, nor did it result in, a change of official Federal policy. It was a reaction to the strong feedback provided by local constituents. Its singularity is an interesting footnote to an aggressive Federal construction campaign. Federal buildings were considered plums to local communities, and the fact that the local community of St. Augustine was able to exert enough pressure on the Federal agency charged with constructing a new facility to veer away from its standardized plans speaks to the importance of this project on a local level, not a national level.

The nomination attempts to tie the construction of this building with events far down the road, including the passage of the National Historic Preservation Act and the creation of the Secretary of the Interior's Standards and Guidelines. The connection is tenuous at best. There is no direct evidence that the Treasury Department's experience with the Government House helped influence later decisions (the reference to activities in St. Augustine made in the nomination could apply to nearly anything, but more likely the general preservation efforts {page 8-19, footnote 40}).

The use of Criterion C with Conservation as the area of significance is unclear. That use would entail a discussion of the "methods of construction" as it applies to the conservation of the building. There is little discussion of the actual methods used, other than stabilization of the outer walls, and the "feathering" of stucco to tie the new construction to the existing cochina. There is no discussion of how or why this is significant on any level. If, however, the point is to look at the importance of this restoration in national building conservation efforts, then Criterion A would be the appropriate choice. And, in that case, there must be a *direct* association between the ideas and practice of conservation in this building and future policies and practices. The nomination does not make this direct association.

The nomination presents an interesting and well-written overview of the Treasury Department's building program, and the birth of Federal preservation policy. It does not, however, demonstrate that the restoration of this building had a significant impact on either program. It does demonstrate that it was, at the time the work was done, an outlier in Federal construction. It does demonstrate that the reconstruction of the Government House was a reaction to local pressure, and that when so pressured, Federal agencies may accede to context-sensitive design. But it does not demonstrate that a change in Federal policy or practice can be traced to decisions and practices made for this building.

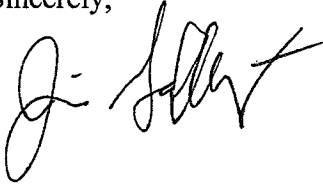
We believe that this is an individually eligible building in Social History at the local and perhaps state level. It meets the requirements of the Florida's New Deal Resources MPS at the local or state level. It has local significance under Criterion A in the area of Conservation as it relates to the City's efforts to maintain, preserve, and perpetuate its colonial past.

Government House

If you wish to resubmit the nomination with significance in Conservation at the local level, please remove the references to national importance and provide additional information on the preservation activities in St. Augustine in the 1930s. If you wish to nominate it at the state level, please provide additional information on preservation/conservation activities in Florida during the same period.

We appreciate the opportunity to review this nomination and hope that you find these comments useful. Please feel free to contact me if you have any questions. I can be reached at (202) 354-2275 or email at <James_Gabbert@nps.gov>.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Gabbert", written in a cursive style.

Jim Gabbert, Historian
National Register of Historic Places
September 30, 2013

RON DeSANTIS
6TH DISTRICT, FLORIDA

COMMITTEE ON FOREIGN AFFAIRS
COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM
COMMITTEE ON THE JUDICIARY

Congress of the United States
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EXECUTIVE SECRETARIAT

June 19, 2013

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Jewell,

I am writing to you today regarding the U.S. Fish and Wildlife Service (FWS) and the U.S. National Park Service (NPS) assessment of proposed site alternatives for a commercial space complex on lands controlled by the National Aeronautics and Space Administration (NASA), which are located in the congressional district that I represent. As you know, this land is currently managed by the FWS under an agreement with NASA as part of the Merritt Island National Wildlife Refuge.

It has been brought to my attention that preliminary actions and publicly-released material by the local FWS refuge manager may not reflect an open-minded approach to this pending federal assessment. I am concerned that these actions may be prejudiced by a desire to sustain the "status quo" of land use and management versus an evaluation based on scientific and technical merits, and a shared commitment to find a workable, environmentally-responsible outcome.

I support the need for the commercial spaceport facilities, which will greatly benefit Florida's sixth congressional district, and it is my hope that the State of Florida and the involved federal agencies, working in good faith, will be successful in this effort. Therefore, as the Fish and Wildlife Service, the National Park Service and all relevant agencies undergo an Environmental Impact Statement, I expect that they will do so in a manner that is in accordance with applicable statutes and procedural guidelines.

As a Member of Congress, serving on the House Oversight and Government Reform Committee, I take my Congressional oversight responsibility very seriously. Therefore, I ask that you please respond to the following questions as soon as possible but not later than July 17, 2013.

- Confirm the preparation of a preliminary written assessment of the State's proposed Shiloh Launch Complex by FWS personnel and provide this office a copy of any documents prepared, including any version released unofficially or otherwise to Florida Audubon or any other individuals or groups;
- Explain why such a document prepared by FWS could have been released to a targeted audience without any other agency involvement, coordination and input from the State, and without transparent public review and comment;

- Identify any follow-up efforts that the FWS Refuge Manager and staff have undertaken to respond to the State's initial request, made by Space Florida, for assistance in determining how to best minimize any potential adverse impacts from the proposed project on the proposed site;
- Explain why FWS believes management of Florida scrub jay habitat, including restored areas, through controlled burns within the Canaveral National Seashore would be "constrained" when they occur infrequently and Space Florida has already committed that the requirement will be clear and mandatory for any future launch operators to accommodate this FWS habitat management technique? Please furnish my office with the record or controlled burns performed in the areas of Canaveral National Seashore north of Haulover Canal over the past 10 years;
- Explain how the cultural resources of the historic agricultural operation known as Elliott's Plantation would be adversely affected when Space Florida has been actively working with NPS archeologists to understand the area of concern for this resource and to avoid the identification of a site alternative that would encroach into the NPS-defined area as mapped in their application for a National Historic Register site;
- Explain why FWS would only identify adverse impacts without consideration of positive impacts to the affected areas, including proposed mitigation measures and voluntary enhancements to be proposed by the State, including the proposal already made to limit future space launch activities in the northern portion of KSC to this proposed project, with measures to ensure the long term conservation of the remaining areas north of Haulover Canal by transferring land ownership control from NASA to the Department of Interior;
- Explain why the FWS or NPS might be opposed to a transfer of ownership control from NASA to the Department of Interior, since this would permanently resolve the concern associated with potential future withdrawals;
- Please verify the willingness of the FWS and NPS to cooperate fully, openly, and in the spirit of achieving an outcome that balances the federal interests of national resource conservation with national space transportation needs.

Thank you in advance for responding to these questions. If you have any questions, please feel free to contact Rachel Dresen, of my staff, at (202) 225-2706. I look forward to your prompt reply.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron DeSantis", written over a white background.

Ron DeSantis
Member of Congress



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard

Atlanta, Georgia 30345

In Reply Refer to:

FWS/R4/RF/Area II/054957

JUL 15 2013

The Honorable Ron DeSantis
House of Representatives
Washington, D.C. 20515

Dear Representative DeSantis:

Thank you for your June 19, 2013, letter to Secretary Jewell regarding a commercial space complex proposal on Merritt Island National Wildlife Refuge (Refuge) in Florida. The Secretary asked me to respond on her behalf.

The Refuge is managed by the U.S. Fish and Wildlife Service (Service) and was established in 1963 by interagency agreement with the National Aeronautical and Space Administration (NASA) to manage the non-operational areas of the Kennedy Space Center for migratory birds and other wildlife. The Refuge totals 140,000 acres with 34,000 acres co-managed with the National Park Service (NPS) as part of the Canaveral National Seashore (Seashore). The Refuge and space activities have coexisted for over 50 years, and this relationship has produced positive impacts on the local economy through eco-tourism, outdoor recreation, and space launch activities.

The Service, through its agreement with NASA, is responsible for managing the Refuge consistent with Service laws, regulations, and policies. As a result, whenever a use of the Refuge is proposed we are obligated to review the use. The Service is ready to work with the Federal Aviation Administration (FAA) and others through the environmental review process for the proposed Shiloh Launch Complex on undeveloped Refuge-managed lands.

While the Service has not yet been asked to serve as a cooperating agency in the work ahead, it is preparing basic information about the Refuge and its natural resources based on our staff's limited knowledge of the proposal. This, along with early coordination, will allow the Service to engage with NASA, the U.S. Army Corps of Engineers, the NPS, and the FAA on the development of the Shiloh Launch Complex Environmental Impact Statement to evaluate impacts – both positive and negative – to Refuge resources that may occur from direct, indirect, and cumulative effects of the proposal.

To date, the Service has received limited information on project details, mitigation measures, and potential impacts from one staff briefing presented by Space Florida. As a result, the Service has not completed an assessment of the proposed Shiloh Launch Complex. We have prepared internal briefing documents on the proposal based on current understanding. These briefing documents are being used to share relevant information about this proposal with agency leadership.

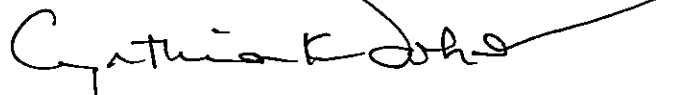
The Service recognizes the potential impacts from the construction and operation of a launch site on the Refuge to wildlife, associated habitats, and archeological and cultural resources located in the vicinity of the project proposal. Our agency and others have important roles in addressing any potential impacts, and we would refer you to those partners for more information about their interests and work.

One such potential impact that may be identified by the Service through the environmental review process is the limiting of prescribed burning operations in the project proposal area. The Service routinely conducts prescribed burns on the Refuge to reduce hazardous fuels and manage fire-dependent habitat for fire-dependent species such as Florida scrub jay. Over the past decade, 57 refuge prescribed burns were conducted by the Service north of Haulover Canal. In other areas of the Refuge, prescribed burning is frequently restricted or completely prohibited within three to six miles of a launch or payload storage facility due to NASA and Air Force launch operations and activities. The addition of a launch facility in the Shiloh area, where little infrastructure and no burn restrictions currently exist, could result in limiting or prohibiting prescribed burning operations and an added liability during wildfire suppression. A complete assessment cannot be conducted until the Service receives a proposal.

As part of the environmental review process, the Service supports the identification of other potential launch sites that limit adverse impacts to the Refuge given our agency's responsibility to identify potentially adverse impacts on National Wildlife Refuge System lands. We also support the transfer of ownership of all NASA lands under refuge management north of State Road 402 and certain areas south of State Road 402 (NASA Operational Buffer and Conservation Area 1) to the Department of the Interior.

We would be glad to meet with you and your staff to further discuss this matter. Please contact me at 404/679-4000, or David Viker, our Regional Refuge Chief, at 404/679-7152 if you have any questions.

Sincerely yours,



Cynthia K. Dohner
Regional Director