

HISTORIC HAWAII FOUNDATION

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EV21 Project Mgr, MCB Hawaii Home Basing EA
Naval Facilities Engineering Systems Command, Pacific
258 Makalapa Drive Ste. 100
Joint Base Pearl Harbor-Hickam, HI 96860-3134

Via email to NFPAC-Receive@Navy.mil

**RE: NEPA Draft Environmental Assessment
Homebasing of the MQ-9 Marine Aerial Vehicle Squadron and KC-130J Marine
Aerial Refueler Transport Squadron
Marine Corps Base Hawaii'i Kāne'ōhe Bay
District of Ko'olaupoko, 'Ahupua'a of He'eia, Island of O'ahu**

Dear EV21 Project Manager:

Historic Hawai'i Foundation (HHF) is providing comment on the Draft Environmental Assessment (DEA) for a proposed action to home base a Marine Corps MQ-9 Marine Unmanned Aerial Vehicle (UAV) (MQ-9) Squadron and a KC-130J Aerial Refueler Transport (KC-130J) Squadron at Marine Corps Base Hawai'i (MCBH) Kāne'ōhe Bay as part of Marine Aircraft Group 24 (MAG-24).

These comments are also provided on the project's potential to affect historic properties pursuant to Sections 110 and 106 of the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations at 36 CFR Part 800. HHF is a consulting party to the US Marine Corps and the US Navy pursuant to the implementing regulations of the NHPA at 36 CFR § 800.2(c)(5) as an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties.

Historic Hawai'i Foundation opposes the proposed demolition of Hangar 103 and the reasonably foreseeable potential demolition of Hangar 104. HHF strongly recommends that MCBH and Navy select alternative locations that would be less impactful to historic and cultural resources.

Project Description

The DEA describes the project as: The proposed action is to home base an MQ-9 UAV squadron and a KC-130J squadron at MCB Hawai'i Kaneohe Bay. Under the proposed action, the Marine Corps would replace and modify existing hangars and supporting infrastructure, perform aviation

maintenance, provide training for operators and maintainers, conduct approximately 3,000 MQ-9 and 5,280 KC-130J annual aircraft operations, and station approximately 676 personnel (229 MQ-9 and 447 KC-130J personnel) plus dependents at MCB Hawaii Kaneohe Bay (DEA Sec. 2.1).

Major project elements that have the potential to affect historic and cultural resources include:

- Demolition of Hangar 103 (a contributing feature of the NAS Kāneʻohe Aviation Historic District and part of the setting of the Kāneʻohe Naval Air Station National Historic Landmark);
- Modification of Hangar 102 with interior renovations to electrical, mechanical and communications systems (a contributing feature of the NAS Kāneʻohe Aviation Historic District and part of the setting of the Kāneʻohe Naval Air Station National Historic Landmark);
- Installation of two Ground Data Terminals, at Keawanui Hill (located in the Mōkapu House Lots Archaeological District) and adjacent to Hangar 105 (a contributing feature of the NAS Kāneʻohe Aviation Historic District);
- Resurfacing, repaving, striping and installing tie-downs at Bravo Ramp (a contributing feature of both the NAS Kāneʻohe Aviation Historic District and the Kāneʻohe Naval Air Station National Historic Landmark);
- Constructing a new Type II Hangar in the Aviation Historic District on the footprint of the historic Hangar 103;
- Demolition of Facilities 159, 160 and 161 (aircraft spares storage buildings adjacent to Hangar 103); and
- Demolition of Facilities 183 and 184 (aircraft armament storage buildings adjacent to Hangar 103).

Identification of Historic and Cultural Resources

There are several historic properties affected by the proposed project. These include:

- The **NAS Kāneʻohe Bay Aviation District** includes 45 buildings and structures and the historic portion of the present runway. It also includes the wreckage of a PBY (patrol bomber manufactured by Consolidated Aircraft) offshore in Kāneʻohe Bay. The major contributing facilities include five aircraft hangars, five seaplane ramps, and numerous ancillary buildings.
- The **NAS Kāneʻohe Bay National Historic Landmark** (NHL) is a smaller section within the larger Aviation District. It includes Hangar 1, the five seaplane ramps, the seaplane parking area to the east of Hangar 1, and the seaplane parking area between the hangars. The parking aprons still carry strafing marks and bomb craters from the 1941 attack. Extant hangars 1, 3 and 4 were present at the time of the attack. The current hangar 2 was present but was modified and rebuilt during the war. Hangar Row is an aspect of the setting that provides historic integrity to the NHL.

- The **Mōkapu Houselots Archaeological District** encompasses a portion of the geographical area of Pali Kilo. Its significance is described as multi-layered, and includes multiple periods, types, and associations of significance. The Archaeological District includes numerous sites associated with the pre-Contact period as well as with the pre-military period, including the remains of early twentieth-century house sites that were part of the 350-parcel residential Mōkapu Tract Subdivision developed between 1932 and 1941.
- **Archaeological Site 7723** is recommended as potentially eligible for inclusion on the National Register of Historic Places under Criteria C and D, and as a contributing property of the Mōkapu Houselots Archaeological District at Pali Kilo. MCBH found that it is probable that the pre-Contact components of this site have their origins during the Late Pre-Contact period.

HHF Comments on Effects on Historic and Cultural Resources

The Environmental Assessment identifies historic and cultural properties affected by the project. Historic Hawai'i Foundation notes the acknowledgement of significant adverse effects on several historic properties and the effort to resolve those effects through the NHPA Section 106 process. HHF affirms its continuing participating in the Section 106 consultation to resolve effects.

However, the draft Environmental Assessment fails to adequately identify and address cumulative and indirect effects that are reasonably foreseeable, and also fails to adequately engage in planning to minimize effects on the National Historic Landmark.

1. Effect on National Historic Landmark

The project location includes the NAS Kāneʻohe National Historic Landmark. It will have direct effects on Bravo Ramp and to the NHL setting by demolishing Hangar 103. NHPA Section 110(f) requires that the agency official, **to the maximum extent possible**, undertake such planning and actions as may be necessary to **minimize harm to any National Historic Landmark** that may be directly and adversely affected by an undertaking. This requirement is also enacted in 36 CFR § 800.10 as special requirements for protecting National Historic Landmarks (emphasis added).

2. Cumulative Impacts

MCBH fails to accurately describe the proposal to demolish another historic hangar (Hangar 104) under a separate undertaking. Table 4-1 of Past, Present and Reasonably Foreseeable Actions Item 35 describes the proposal as “renovation of Hangar 104 to accommodate two C-40 aircraft” (page 4-5), while the narrative describes the proposal as “replacement of an existing hangar for C-40 aircraft” (page 4-8).

During the NHPA Section 106 consultation, MCBH described the 10-year timeframe of potential projects that could affect contributing resources in the Naval Air Station Kāneʻohe Bay Aviation District:

At the time the district nomination was prepared, there were 60 contributing resources. Currently, there are 45 extant. If all proposed actions are carried forward, at the conclusion of the Hangar Modernization effort there will be an additional 18 contributing resources razed.

This will leave 27 contributing resources remaining, of which only 5 are buildings, the others being contributing structures and objects. (MCBH presentation Feb. 10, 2022).

3. Alternatives Analysis

MCBH's analysis of alternatives included no action; alternative locations at Joint Base Pearl Harbor Hickam; USCG Air Station Barbers Point; Wheeler Army Airfield and Dillingham Military Reservation. Each of these was eliminated from consideration due to the inability to meet specific criteria and project needs.

MCBH also assessed alternate siting locations within the Kāneʻohe Bay base. Sites at West Field, Pali Kilo and Greenfield were eliminated due to various technical criteria and the long-lead time for construction, delaying the proposed action by 10-12 years.

HHF disagrees with the decision to eliminate the Greenfield alternative. Conceptual site plans indicate that with design adjustments, the location can address the perceived barriers and still meet the purpose and need for the project. This site has roughly the same construction feasibility issues as the proposed alternative (such as demolishing and replacing facilities and utilities) and is much less impactful to historic properties and the historic district.

Therefore, HHF requests that MCBH and Navy consider the Greenfield site as a potential alternative location for the Homebasing project, the C-40 Hangar project or both. This would be a reasonable alternative to avoid significant and irreversible impacts on a nationally significant historic property.

Thank you for the opportunity to comment. Historic Hawai'i Foundation looks forward to continuing consultation.

Very truly yours,



Kiersten Faulkner, FAICP
Executive Director

Copies via email:

- Maj Jeff Hart, June Cleghorn, Wendy Wichman and Chris Frantz, MCBH
- Alan Downer, Susan Lebo, Stephanie Hacker and Julia Flauaus, Hawai'i State Historic Preservation Division
- Elaine Jackson-Retondo, National Park Service
- Elizabeth Merritt, National Trust for Historic Preservation