

HISTORIC HAWAII FOUNDATION

680 Iwilei Road Suite 690, Honolulu HI 96817 • (808) 523-2900 • preservation@historichawaii.org • www.historichawaii.org

September 26, 2021

Captain J. G. Meyer, CEC
Regional Engineer
Commander, Navy Region Hawai'i
Department of the United States Navy
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam

ATTN: Jeffrey Pantaleo (jeffrey.j.pantaleo.civ@us.navy.mil)

RE: National Historic Preservation Act Section 106 Consultation
Proposed Disposal of Fort Kamehameha Housing Historic District
Joint Base Pearl Harbor-Hickam
Hālawa Ahupua'a, 'Ewa District, O'ahu
TMK (1)-9-9-001:013

Dear Captain Meyer:

Historic Hawai'i Foundation (HHF) received notice of the above-mentioned project pursuant to Section 106 of the National Preservation Act (NHPA). HHF received Navy's letter of August 31, 2021 opening consultation, containing project description and attached exhibits, via email the same day.

HHF accepts the invitation to participate in the consultation for the “disposal” of the Fort Kamehameha Housing Historic District at Joint Base Pearl Harbor-Hickam (JBPHH).

Historic Hawai'i Foundation submitted questions and requests for additional information via email on September 7, 2021. HHF also participated in an initial consultation meeting on September 21, 2021 with NAVFAC Hawai'i representatives and consulting parties, including Hawai'i State Historic Preservation Division (SHPD), Advisory Council on Historic Preservation (ACHP), National Park Service (NPS), National Trust for Historic Preservation (NTHP) and Ali'i Pauahi Hawaiian Civic Club (HCC).

During the consultation meeting, Navy provided initial responses to HHF's questions and stated they would also provide the information in writing via email following the meeting. We have not yet received the written responses.

Interests of Historic Hawai'i Foundation

Historic Hawai'i Foundation is a statewide nonprofit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i. HHF is a consulting party to the US Navy pursuant to the implementing regulations of the NHPA at 36 Part 800.2(c)(5) as an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties. HHF is a Concurring Party to the Programmatic Agreement Among the Commander Navy Region Hawai'i, the Advisory Council on Historic Preservation and the Hawai'i State Historic Preservation Officer Regarding Navy Undertakings in Hawai'i (CNRH PA, 2012).

Description of the Undertaking

Navy is "initiating consultation for the disposal of the Fort Kamehameha houses at Joint Base Pearl Harbor-Hickam (JBPHH), O'ahu, Hawai'i."

The purpose for Navy's proposal to destroy a nationally-significant historic district is presented as a requirement of "current safety restrictions" as identified in Unified Facilities Criteria 3-260-01, Federal Aviation Regulation Part 77 and Air Force Instruction 32-7063 due to the district's "proximity to the Dan Inouye International Airport." These restrictions are delineated as "zones" centered on the airport runways, with Clear Zone (CZ), Lateral Clearance Zone (LCZ), Accident Potential Zone I (APZ I) and Accident Potential Zone II (APZ II). Ft. Kamehameha is located in APZ I.

Navy states that due to the airfield safety regulations, JBPHH has "no viable redevelopment options, ability to reuse for alternative mission requirements or available sustainment funds."

On September 7, HHF submitted written requests for information about those regulations. Specifically, HHF asked:

- What is the source regulation(s) that resulted in the map of Accident Potential Zones (APZ) depicted in Enclosure 3? Is the map and zone delineation a result of applying a specific regulation from one of the references, or a combination of two or more of them, or something else? Is it precise in terms of boundaries or is it a general depiction?
- Are there any factors that affect the size and boundaries of the APZ areas? For example, does it change with the size of the aircraft, the frequency of flights, the direction of take-off/landing, the actively used portions of the runway, etc.? Or is it just a proportional distance from the center of the runway? Or something else?
- What uses are allowed or prohibited in each of the APZ areas? Are restrictions based on size or location of the structure, use and occupancy, or something else? Please provide a table or chart that shows allowed uses in each APZ by the regulatory authority (if they are different; if they are consistent, please note that).

- What is the enforcement mechanism for implementation of the APZ regulations? Does it vary on public/Federal land vs. public/State (or County) vs. private ownership? Does it vary for existing nonconforming buildings/uses vs new construction?

HHF requests that Navy provide information about the regulations and clarify how the restrictions are applied this undertaking.

Navy's Enclosure 3 is a map of three runways at the Inouye International Airport with the color-coded dimensions and areas described as the Clear Zone (CZ), Lateral Clearance Zone (LCZ), Accident Potential Zone I (APZ I) and Accident Potential Zone II (APZ II) for each of the three runways.

We appreciate Navy's intent to provide a safe environment by applying the criteria to address development within the Zones. However, HHF is extremely concerned about how Navy is applying and interpreting the regulations. The discussions about acceptable uses have not been consistent. The undertaking lacks any discussion of the land use implications of the APZ, including how it has and has not been applied to other facilities under Navy's jurisdiction with the same regulatory constraints.

The undertaking should identify all areas that are impacted by the APZ, existing land uses within the designated APZ, and the proposed disposition of development within all impacted areas. The APZ map indicates that there are several industrial, administrative, commercial and office areas that are located within the zones. What efforts are being made to vacate or otherwise increase safety in the other non-residential areas?

Both the Navy and the State of Hawai'i/City & County of Honolulu have developed family housing neighborhoods (including a child development center) located in APZ I within the past few years (Halsey Terrace and Kahauiki Village were both developed per public-private partnerships on Federal or State land with public funds). This indicates that the regulations either provide flexibility to allow for low-density residential use in this zone, or that these government entities chose to disregard those regulations. What efforts are being made to vacate or otherwise increase safety in the other housing areas?

Historic Hawai'i Foundation's concern is that Navy appears to target the Fort Kamehameha Historic District for special adverse treatment while other properties are not being treated in an equivalent manner. If the purpose of this undertaking is to increase safety, then that should be a priority in all areas in APZ I.

HHF requests that Navy define the purpose and need; describe how the proposed undertaking addresses the purpose and need, and address the concern of inequitable and targeted adverse effect on a historic property while not applying the same regulations to other Navy properties.

Currently, Fort Kamehameha Housing Historic District consists of 48 buildings and structures that include officers' housing, a chapel, bandstand, flagpole and abandoned gun batteries. The district also includes archaeological sites, a burial vault for reinternment of human remains, mature trees and landscaping in open

green space, a circulation system of streets and sidewalks. Within the general area, there are non-historic buildings and structures that are also located within APZ I or just outside the APZ boundary.

Navy stated that the undertaking will be disposal of all 33 of the houses, whether or not they are located in APZ I. Enclosure 2 is a map which shows the boundary of the Historic District, the APZ boundary line, color coding of contributing historic buildings/structures with a hatchmark overlap of those “considered for disposition,” archaeological buildings/structures with no indication of proposed disposition, and other (non-historic) structures with no indication of proposed disposition.

The map indicates that Navy is considering disposal of 33 homes, including three that are outside the APZ, and additional facilities: 3366 (unknown description), 3360 (unknown description), 3373 (Chapel), 33X2 (illegible facility number, Bandstand), and the Flagpole. However, the written description of the proposed action does not include the non-housing facilities. During the September 21 consultation meeting, Navy stated that the map is incorrect and would be updated and replaced.

Neither the description nor the map addresses the proposed course of action for non-contributing properties in the Historic District and/or the APZ.

What is the proposed action as it applies to the chapel, bandstand, flagpole and abandoned batteries? What is the proposed action as it applies to the non-historic properties in the Accident Potential Zone (APZ)? What is the proposed action as it applies to the landscape, trees, recreational and open space facilities (beach, playgrounds), sidewalks and roads? What is the proposed action as it applies to the archaeological sites and burial vault?

Historic Hawai‘i Foundation requests that Navy clearly define the undertaking, the affected resources and provide a map clearly indicating the project scope.

Area of Potential Effect (APE)

The Navy’s letter did not provide an Area of Potential Effect (APE).

Please provide a description and a map of the APE.

Identification of Historic Properties

Navy has determined that “Fort Kamehameha Housing, part of the Fort Kamehameha Historic District, is a National Register of Historic Places (NRHP)-eligible historic district with 42 contributing properties.”

Please provide the evaluation of historic significance for the Fort Kamehameha Housing and its 42 contributing properties, as well as the evaluation of historic significance for the Fort Kamehameha Historic District. Please also describe relationship of Fort Kamehameha Historic District to the Artillery District of Honolulu as there appears to be some overlap. Please provide a description of the Navy’s efforts to identify archaeological historic properties and the results of those efforts.

Please provide a description of other contributing features or properties to the district, including the historic landscape features.

Navy states that the houses are currently in a mothballed status; this action was coordinated with SHPD during the development of the Fort Kamehameha Environmental Impact Statement Alternatives for the Disposition of Fort Kamehameha Historic District Buildings and Structures by the Air Force in 2009. Navy says that abatement of lead and asbestos were recently completed for three homes.

Historic Hawai'i Foundation agrees that the Fort Kamehameha Housing District is eligible for listing on the National Register of Historic Places and that the historic structures retain significance and integrity.

Evaluation of Alternatives

Navy states that its assessment of alternatives include relocation for use off-site, deconstruction/salvage and demolition.

HHF requests that the assessment of alternatives also evaluate options for avoiding and minimizing the adverse effect.

Historic Hawai'i Foundation has maintained since 2008, when the homes were vacated, that this intact historic district is significant and merits special treatment. As discussed above, it appears that Navy has the ability to apply flexibility to allow low-density residential and ancillary uses within APZ I. This alternative should be explored and prioritized.

Other alternatives could include adaptive reuse and modification for non-residential purposes, and limited disposal of only some of the houses (e.g. retain and preserve those that are not located in the APZ). These alternatives could include such uses as recreational day use, transient housing or swing space, temporary housing/recreational cabins, educational facilities, support for Hawaiian cultural access and practices.

HHF is also concerned with Navy's statement that "[c]urrently, 96 homes of similar design and size are extant between Schofield Barracks and Ford Island." The Navy seems to imply that the loss of the 33 historic homes at Ft. Kamehameha are inconsequential because of the existence of other historic resources.

HHF rejects this premise. First, historic properties are not interchangeable. By definition, they represent unique and irreplaceable assets. Furthermore, the reference to other military family housing of this era and style implies that those neighborhoods will be preserved under long-term preservation commitments. While that should be true as a result of existing legally-binding programmatic agreements with Navy (for the Ford Island neighborhoods) and Army (for the Schofield Barracks neighborhoods), both Navy and Army have taken steps within the past two years to undermine and evade those agreement documents and the preservation stipulations therein. HHF fears that those historic housing groupings are also threatened for inappropriate treatment.

Determination of Effect

Navy states that:

“Under NHPA Section 106 implementing regulations, adverse effects include physical destruction of all or part of a historic property (36 CFR 800.5(a) (2) (iii)). The Navy has determined that the proposed project to dispose of Fort Kamehameha houses will result in an “adverse effect: to historic properties (36 CFR 800.5(b)). Pursuant to Stipulation IX.C. 1 of the CNRH PA, the Navy is therefore initiating consultation to resolve adverse effects in accordance with 36 CFR 800.6.

To resolve the adverse effects of the transfer of the Fort Kamehameha houses out of Federal ownership and/or disposal, a Memorandum of Agreement (MOA) will be developed stipulating appropriate mitigation measures for adverse effect.”

Historic Hawai'i Foundation agrees that the potential “disposal” of the historic Fort Kamehameha homes is an adverse effect.

Historic Hawai'i Foundation looks forward to receiving the additional information and to continuing consultation.

Very truly yours,



Kiersten Faulkner
Executive Director

Copies via email:

NAVFAC: Sherri Eng, Zachary Altenburger, Jeff Dodge, Prabha Bajracharya, April Teekell

ACHP: Katharine Kerr

SHPD: Alan Downer, Susan Lebo, Stephanie Hacker and Julia Flauaus

NTHP: Elizabeth Merritt

NPS: Melia Lane-Kamahele, Elaine Jackson-Retondo and Doug Wilson

Ali'i Pauahi Hawaiian Civic Club: Kehaulani Lum