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Mason Architects

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Dear Lawrence,

Glenn asked me to formally respond to your e-mail of November 17, 2008, which transmitted the 12 Nov 2008 letter from the Commander, Navy Region Hawaii to the Director, Department of Transportation Services. This Navy letter lists seven Quonset huts and six other structures in the 499 acres of the former Naval Air Station Barbers Point (NASBP) that were recently conveyed. The letter states that the Navy determined or considered these thirteen facilities not eligible for National Register of Historic Places (NRHP), and that the "determinations listed in the Transit Corridor [Historic Resources] report conflict with determinations upon which Navy previously received State Historic Preservation Office (SHPO) concurrence."

We did not miss "a lot of history on eligibility determination[s]" that the Navy brought up in their letter. We would like to point out that in the Historic Resources Technical Report, Appendix A's tabular format does not allow room for the "history of eligibility determinations" for any of the historic resources listed.

We were the historic resources subconsultant for the Navy cultural resources survey (by Tuggle and Tomonari-Tuggle, finalized in 1997) mentioned in the Navy letter, as well as for the earlier surveys. However, we are not familiar with the Environmental Impact Statements (EIS) mentioned in that letter or with the correspondence with the SHPO regarding concurrences on NASBP NRHP eligibility determinations. We have never seen the report, referred to as the "Navy's 1999 Cultural Resources Management Plan" (CRMP). [We assume that is a CRMP for NASBP, but we only have the one for the Pearl Harbor Naval Complex.]

It is perfectly acceptable and understandable that the Navy was relying on its previous eligibility determinations during the process of conveying the 499 acres. We knew that the ownership of much of NASBP was in transition and, therefore, under the "Owner" column we listed "unknown" for the facilities there.

It is our understanding from Parsons Brinckerhoff (PB) that the City does not plan to update or revise any of the Technical Reports. Therefore, it seems that the Historic Resources Technical Report will not be revised "to reflect Navy's eligibility determinations" for the thirteen listed structures. We also do not think it is necessary, since the City has decided that the potentially historic resources in the extensions are not going to be submitted at this time to the SHPO for eligibility concurrence, because they are not a part of the Project defined in the Transit Draft EIS.

We would like to provide you and the Navy with some background on how we arrived at the eligibility evaluations of the thirteen facilities mentioned in the Navy letter. It is important to note that the Appendix does not list "eligibility determinations" for any of the NASBP facilities, just evaluations of eligibility made for the Technical Report or presumed agreements on eligibility [for those NASBP facilities for which Historic American Buildings Survey (HABS) reports were done]. As mentioned above, we were not aware of the official determinations by the Navy and the concurrences made by the SHPO.

The seven Quonset huts (Facilities 1144, 1149, 1150, 1152, 1153, 1562, and 1570) mentioned in the Navy letter were listed in Appendix C of the Tuggle and Tomanari-Tuggle survey report as Category III (not eligible for the National Register), based on field work in late 1994/early 1995 and discussion about the nationwide Programmatic Agreement concerning World War II temporary buildings. However, later in 1995 two HABS reports (covering the five facilities with 1100 numbers and the two huts with 1500 numbers) were commissioned by the Navy as part of the documentation for NASBP base closure. Our understanding was that the Navy and the SHPO had agreed that these seven Quonset huts were eligible, since HABS reports are not done for resources that are determined ineligible for the NRHP.

The same history of eligibility categorization applies to the wooden World War II warehouses at NASBP. Facilities 476 and 477 were two of the scattered warehouses which were documented with a HABS report commissioned in 1995, as part of the NASBP base closure. It was assumed that the Navy and SHPO had agreed on their eligibility.

Facility 5, a chapel, was categorized in the original overview survey report for NASBP as Category III (not eligible for the National Register), based on field work done in 1992. The chapel was dated 1942, but since it had been moved from Camp Malaokole about 1952 and its façade altered, it was not then considered eligible as a WWII building. By the time of the 2007-2008 survey for the transit project, however, the chapel had been at NASBP for more than 50 years and it was re-evaluated as a Cold-War era building which was eligible under Criterion A, as an example of building recycling by the military.

Similarly, Facility 77 is a 1958 Bachelor Officers' Quarters (BOQ), which was re-evaluated for the transit survey because it had attained an age of 50 years. We consulted with noted Cold War historian Karen Weitze who has studied the firm that designed this building, Pereira & Luckman. This BOQ would qualify for the National Register under Criteria A and C. Further information is provided on the form for this building.

Facility 128 is a 1942 building that was categorized in the original overview survey report for NASBP as Category III (not eligible for the National Register), based on field work done in 1992. That categorization was repeated in the Tuggle and Tomanari-Tuggle survey report, since no additional field work was done for that facility. The Navy list of facilities used for the initial NASBP survey work listed this as a Reserve Training Building. By the

time of the Transit project survey, this facility's original function/name had been found to be Radio Transmitter Building. This was a significant World War II function, and, thus, the building was re-evaluated as eligible for the National Register.

Facility 484 is an adjacent electrical transformer building, which was not included in any of the 1990s historic resources surveys. It appears to have been missed because it was not on the Navy 1990s lists of facilities for NASPB (but perhaps on their list of facilities, such as utilities, that were under the control of the Public Works Center). Its association with Facility 128 was the reason it was evaluated as eligible for the National Register.

We hope this explanation clarifies how we arrived at the eligibility evaluations in the Historic Resources Technical Report for the Transit project. The history of official eligibility determinations for the Quonset huts and other structures, which the Navy has provided in its letter, will be presented in the forms for those resources that are being prepared for the SHPD. Please note that the evaluations of eligibility that are indicated in the Historic Resources Technical Report are not official eligibility determinations, as stated on page 3-5 of the report.

If the Navy has other questions about these resources or others that they own within the Transit Project's Area of Potential Effect, we suggest setting up a meeting with them to discuss such topics.

Sincerely,



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