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Preserving America's Heritage

August 22, 2005

The Honorable Gordon R. England
Secretary of the Navy
1000 Navy Pentagon
Washington, DC 20350-1000

Dear Mr. Secretary:

I am writing to convey to you the comments of the Advisory Council on Historic Preservation (ACHP) to help resolve a dispute regarding plans by the U. S. Department of the Navy to demolish historic structures at Naval Air Station (NAS) Pensacola, Florida. The proposed actions are part of an overall program by the Navy to recover from damages caused by Hurricane Ivan. These comments are offered in accordance with Stipulation III.E.2.c. of the Memorandum of Agreement (MOA) entered into on March 11, 2005, by the Navy, the ACHP, and the Florida State Historic Preservation Officer (SHPO) to meet the Navy's responsibility under Section 106 of the National Historic Preservation Act.

Background

On September 15, 2004, Hurricane Ivan struck the panhandle area of Florida, causing extensive damage to NAS Pensacola and environs. Sustaining particular damage was the Pensacola NAS Historic District, a National Historic Landmark (NHL). This 82-acre district contains the remains of the 19th-century Pensacola Navy Yard and the later-established NAS, the first such permanent facility and the first Navy pilot training center in the United States. Responding to the widespread damage, Congress enacted on October 13, 2004, the Military Construction Appropriations and Emergency Hurricane Supplemental Appropriations Act, 2005, which provided special recovery funds to NAS Pensacola, and directed the Navy to obligate these funds by September 30, 2005.

As cleanup operations and damage assessments began in the wake of the storm, the Navy notified the Florida SHPO, the National Park Service (NPS), and the ACHP on October 6, 2004, that it intended to proceed under the emergency provisions in the ACHP's regulations on its plans to repair and demolish historic properties on the base. Consultation, in which the National Trust for Historic Preservation (NTHP) and the NPS also participated, was very difficult due to the extent of demolition proposed and time pressures. Agreement was finally reached that accepted much of the proposed demolition of historic structures, but 16 structures of "greatest significance" to the historic district were identified as needing further study.

The MOA called for the Navy to prepare for each building a preservation analysis report (PAR) to examine historic and architectural value, assess damage, and estimate costs associated with various treatment options. The consulting parties could comment on each PAR, with the Navy then deciding how each of the 16 buildings would be treated. Following notification of the Navy's decision, the consulting parties could object, thus triggering dispute resolution provisions in the MOA that provide for further ACHP review and comment.

By June 18, 2005, the 16 PARs were provided to the consulting parties. The Florida SHPO and NTHP provided extensive comments on the reports and, on July 15, the Navy notified the consulting parties of its intention to proceed with demolition of all but three buildings. Anticipating likely objection from the consulting parties, the Navy notified the ACHP that it was invoking the dispute resolution provisions in the MOA.

Pursuant to the terms of the MOA, I elected to provide the Navy with ACHP comments pursuant to 36 CFR Section 800.7(c), and to expedite our review I appointed a panel of ACHP members. The panel, which I chaired, consisted of expert member Susan Barnes; expert member John G. Williams; Mark Rey, Under Secretary for Natural Resources and Environment, representing the Secretary of Agriculture; and George Schoener, Deputy Assistant Secretary for Transportation Policy, representing the Secretary of Transportation.

On August 8, 2005, the panel visited NAS Pensacola and the Navy provided it with a tour of the NHL district. That afternoon, we conducted a public meeting and received testimony from concerned State officials, private organizations, and individuals. The comments and recommendations that follow are based on consideration by the ACHP of the facts in the case and the review and deliberations of this member panel.

Findings

Consultation under Section 106 has led to agreement with most of the Navy's proposed recovery program, to include plans to repair and rehabilitate many properties within the installation's numerous historic districts and the demolition of many historic properties listed in or determined eligible for listing in the National Register of Historic Places. All consulting parties in the Section 106 process, in particular the Florida SHPO, recognized the enormous task faced by the Navy in recovering from damage caused by Hurricane Ivan. In this spirit, and in recognition of the unique and unprecedented circumstances confronting the installation, the consulting parties accepted the Navy's plans to demolish 27 damaged historic structures, many within the NHL district. This acceptance facilitated the Navy's overall recovery plans, but as more and more historic properties were slated for removal, there was a growing sense of urgency over the fate of the remaining buildings of greatest significance to the NHL district. Debate over the future of these buildings should not diminish the fact that the Navy has achieved in large measure agreement under Section 106 regarding its recovery program. Nor should the Navy be surprised that preservation concerns for these remaining 16 buildings are so acute.

The NAS Pensacola Historic District is an historic property of importance to the Navy and the Nation as a whole. As one of the United States' earliest Navy yards and the birthplace of naval aviation as the United States' first permanent naval air station and first Navy pilot training center, NAS Pensacola occupies an important role in American history and a seminal role in American naval history. The district was listed in the National Register of Historic Places in 1976 at a national level of significance. That same year it received the highest recognition an historic property can achieve; it was designated a National Historic Landmark. Collectively, the 16 buildings of greatest significance that are the subject of this dispute, to include industrial and support service structures and officers' quarters, provide visual evidence of the evolving periods of significance of the district, from naval yard to NAS. The contributing properties of the NHL district offer testimony to the rich heritage of the Navy and, as such, can serve as a

source of inspiration and instruction for military and civilian personnel and their families as part of NAS Pensacola's important training mission. But while these buildings hold a special value for the Navy, it should be emphasized that in a real sense the Navy holds this National Historic Landmark District in trust for the American public, an obligation that carries with it a special stewardship responsibility.

The Navy's current demolition plan will have serious consequences for the historic district and its NHL designation. On July 21, 2005 Rear Admiral C. E. Weaver, Director, Ashore Readiness Division, announced the Navy's response to the PARs and comments from the consulting parties. Of the 16 buildings, the Navy had decided to repair Building 26 to support the port operations functions, Building 28 for storage, and Quarters 7 (and an adjacent support structure) for ceremonial functions. The Navy also proposed to retain the smokestack for Building 47 and create a landscape plaza. The remaining 13 buildings of greatest significance to the NHL district would all be demolished. In testimony from the NPS it was confirmed that the removal of these critical core structures that document the district's period of significance would have such dire consequences for the district that withdrawal of the NHL listing by the Secretary of the Interior would be highly probable. The Florida SHPO expressed a similar opinion. The likelihood that its proposed demolitions could lead to the removal of the NHL designation for NAS Pensacola should be of great concern to the Navy.

The Navy's analysis demonstrates that options to demolition exist. The PARs developed by the Navy's consultants were exceptional, providing an objective and professional assessment of each building's historic merit, structural condition, and associated treatment options. Based on a thorough structural analysis, the report authors concluded that all 16 buildings were structurally sound and repairable. They also provided an exhaustive analysis of treatment options and their costs. It is surprising that the Navy did not rely more on the findings in these reports. Indeed, there was little, if any, reference to the reports by the Navy in justifying its decision to retain only three of the buildings. It is further puzzling why, during the onsite inspection and as part of the presentation at the public meeting, the Navy made virtually no reference to the reports and their conclusions. The ACHP panel found it highly relevant to its deliberations that the reports concluded that the buildings are structurally sound and in repairable condition, and that the cost estimates for demolition exceeded the mothballing estimates for each of the 16 buildings.

Public opinion stands in strong opposition to the Navy's plans. If the public meeting conducted by the ACHP is a fair indication, there exists considerable public concern over the Navy's demolition plans. Testimony from State of Florida officials, local organizations, and individuals all expressed strong opposition to the proposed demolition. No one spoke in favor of the Navy's demolition plans, nor expressed support for the proposed landscaped plaza. Testimony from former Naval officers, former occupants of the Admiral's Row, and Pensacola residents expressed concern that by carrying out the demolition of the NHL, the Navy would cause a long-term rift in the Pensacola community. Local media coverage leading up to and following the public meeting and the editorial position of the Pensacola News Journal all conveyed similar sentiments of concern regarding the Navy's plans.

The demolition plans are at odds with Federal stewardship goals and the standards the Navy has set for itself. From available evidence, to include the initial Figure of Merit scoring that was used by the Navy and presented to the consulting parties at the December 1, 2004 meeting in Atlanta, we have concluded that the Navy set into motion plans for extensive demolition of historic properties without considering the unique historic value of these properties. Once committed to this course of action, the Navy became unwilling to rethink its earlier flawed planning assumptions. We find this action to be contrary to the Navy's responsibilities under Section 110(f) of the National Historic Preservation Act, which directs Federal agencies to undertake to the maximum extent possible, planning and actions to minimize harm to a National Historic Landmark, and the stewardship goals of Executive Order 13287, "Preserve America." In that order, President Bush directed Federal agencies to recognize and manage historic properties in

their ownership “as assets that can support department and agency missions while contributing to the vitality and economic well-being of the Nation's communities and fostering a broader appreciation for the development of the United States and its underlying values.”

The Navy, under its own policy and instructions (SECNAVINST 4000.35A and OPNAVINST 5090.1B CH-23) states that protection of its historic properties is “an essential part of the defense mission... [for which the Navy] is committed to responsible cultural resources stewardship.” It is instructive that NAS Pensacola claims in its own Command Vision for the 21st century to be recognized as an “[a]cknowledged leader in preserving its natural beauty, tradition, and rich history, enhancing our reputation as the most aesthetically pleasing installation in the Navy.” It would be difficult to reconcile this claim with carrying out a demolition program that led to the withdrawal of the National Historic Landmark.

Recommendations

The ACHP is fully aware of the difficult position the Navy is in with the need to obligate by the end of FY 2005 the special funding provided by Congress for recovery at NAS Pensacola. As this date draws near, the Navy may believe that its best course of action is to move forward with its demolition plans. We believe that such a course of action could invite challenges and would not be in the best interest of the Navy and its overall recovery program. Accordingly, and in an attempt to help resolve the dispute we have been asked to address, the ACHP recommends that the Navy take immediate steps to re-evaluate its plans and limit demolition to the maximum extent possible, based on the following considerations:

The proposal to repair Buildings 26 and 28 and Quarters 7 should proceed.

Because reuse options for Building 47 are extremely limited by its prior use and storm damage, the demolition of this structure can be accepted. We favor the Navy's proposal to retain the smokestack, and we recommend further consideration of the Florida SHPO's suggestion that the north and south walls be retained to provide a visual and interpretive context for the smokestack.

Due to the previously approved demolition of Buildings 604 and 52, Buildings 18 and 45 will be effectively isolated from the core of the NHL district. Accordingly, and because of mission needs and conditions assessments, Buildings 18 and 45 demolition could proceed.

Because of extensive damage to its roof, subsequent weather damage and because it does not convey with the same sense of clarity and importance its aviation role as a hangar, in contrast to its neighboring structures, Hangars 73 and 74, Building 27 can be demolished.

All other buildings involved in this dispute--Buildings 1, 74, and 223 and Quarters 2, 3, 4, 5, 6, and 8--should be retained and steps taken to further clear them of debris, secure and stabilize them, and provide protection from the elements. Longer term, the Navy should examine future sensitive adaptive uses for these buildings in conjunction with conversion of the NHL district to Mission-Support or Quality of Life status so that such uses could be encouraged. Collectively, all these remaining buildings are essential in providing visual evidence of the evolving periods of significance of the district, from naval yard to NAS.

In accordance with Section 106 of the National Historic Preservation Act, you must take into account these comments of the ACHP prior to reaching a final decision on the Navy's plans for the 16 buildings of greatest significance to the NHL historic district. In accordance with Section 110(1) of the act and the

Section 106 implementing regulations, this responsibility cannot be delegated. Finally, your response to the ACHP comments must be documented in accordance with 36 CFR Section 800.7(c)(4).

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Nau, III". The signature is written in a cursive style with a prominent initial "J" and a stylized "N".

John L. Nau, III
Chairman